



University of Colorado at Denver and Health Sciences Center

Environmental Health and Safety Department

Compliance Note
March 2007

Controlled Substances
HSD-CAC-002

This information is for your use and as a way of providing consistent information. This information is based on current UCDHSC Policy, and/or Federal, State or Local regulatory requirements.

DEA Controlled Substances

DEA controlled substances are prohibited from being moved from our campus without following specific regulations that apply to those materials. Under no circumstances are they to be moved by contractors.

For the list of federally controlled substances for which you may need a DEA license visit:

<http://www.deadiversion.usdoj.gov/schedules/index.html>

Controlled Substances Security

The general security requirements are in Title [21 CFR Sections 1301.72-1301.76](#). Registrants are required to provide effective physical security controls and operating procedures to guard against theft and diversion of controlled substances, including adequate internal systems for monitoring controlled substances (e.g., storage, security, and inventory) Registrants have an obligation not only to provide effective physical security, but also to initiate additional procedures to reduce access by unauthorized persons as well as to provide alarm systems where necessary.

A DEA **Controlled Substances Security Manual** is available on the web at:

<http://www.deadiversion.usdoj.gov/pubs/manuals/sec/index.html>

Applicants for DEA Registration

If you currently do not have a DEA registration, but need one, please refer to their website:

[DEA Diversion Control Program - New Application Registration](#)

An application typically takes 6 to 8 weeks to process. They will ask about floor plans and security, an explanation of why scheduled substances are needed and DOB/SSN for all those with access to controlled substances.

Registration Renewals

Renewals are automatically generated and mailed eight (8) weeks prior to the expiration date by the DEA office and mailed to the address on file with the DEA. It typically takes 4 weeks or longer to process renewals.

Address Change for DEA Registration

If you currently hold a DEA registration for the possession and use of controlled substances, you must follow DEA procedures for relocating those materials, including changing the physical address of your license with the local DEA office. Moving your lab to Anschutz Medical Campus is considered a modification of your registration.

Compliance Notes are produced by the UCDHSC Environmental Health and Safety Department. Contact 303 724-0345.



University of Colorado at Denver and Health Sciences Center

Environmental Health and Safety Department

To obtain a change of address form for your DEA license, you can download the necessary forms from the website http://www.dea diversion.usdoj.gov/online_forms.htm

Please contact the Denver Division Office for Registrations, 303 705-7323, with any questions. Be prepared to provide your name, DEA number, phone and fax numbers. An inspection visit may be scheduled to assure appropriate security measures are in place.

Shipping Controlled Substances from 4200 E. 9th Ave. to Anschutz Medical Campus RC1

Certain controlled substances are also classified as DOT hazardous materials and may **NOT** be moved to the Anschutz Medical Campus by our lab-packing contractors. Among these are amphetamine, methadone, morphine sulfate, pentobarbital, phenobarbital, secobarbital, and paraldehyde. You will need to refer to the Material Safety Data Sheet from the vendor, Section 14, "Transport Information" for the correct DOT hazard classification. IF classified by the DOT as a hazardous material, they may be disposed of as hazardous wastes through the Environmental Health and Safety Department or you may move them by contacting University Police to transport the holder of the DEA license and the materials. If you need assistance with this or an MSDS, please contact the EH&S Hazardous Materials Manager, 303-724-0294, or brandon.bogger@colorado.edu

Controlled substances not classified as DOT materials may be transported to the Anschutz Medical Campus by the holder of the DEA license. Do not allow the Lab Packing Contractor or any other unauthorized person to handle or ship any of your controlled substances to the Anschutz Medical Campus. Keep all of your controlled substances locked inside a secure storage container.

To Move Controlled Substances to the New Address

1. Submit the change of address form to the DEA office with a returned receipt requested card for your records. You cannot move any controlled substances until the change of address is approved by the DEA.
2. Reconcile your inventory before and after the move. These materials are the only materials to be moved by individual PIs.
 - a. The PI (holder of the license) and a witness inventory the controlled substances in the locked storage areas/container. If a container is of suitable size, durability and portable, it may be used to transport the controlled substances and to store them at RC1
 - b. Compare the controlled substances on hand with the written inventory. PI and witness should then both sign the inventory.
 - c. The PI must move them to the new secured (lockable) area in RC1. This must be **a suitable container or a location that has been keyed for only this use**. Contact Facilities Operations, Locksmith, 303 315-7941 for assistance with key controls.
 - d. The PI and a witness re-inventory the controlled substances as they are put away in the new location. Make a notation in your drug logbook, i.e., "moved to Anschutz Medical Campus, (street address, Bldg/Room #) on mm/dd/yyyy". Both PI and witness sign the entry.



University of Colorado at Denver and Health Sciences Center

Environmental Health and Safety Department

Loss or Theft

The registration holder must notify the nearest DEA Field Office, 303 705-7323, of the theft or significant loss of any controlled substance upon discovery of such loss or theft. The practitioner shall promptly complete and submit DEA Form 106 regarding the theft or loss.