

A Researcher's Guide to the Controlled Substance Program Frequently Asked Questions (FAQs)

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What are "Controlled Substances"?

Narcotic and non-narcotic drugs under the jurisdiction of the federal Controlled Substances Act and the California Uniform Controlled Substances Act, including, but not limited to, those substances listed in 21 CFR §1308.11-1308.15

(<http://www.deadiversion.usdoj.gov/schedules/schedules.htm>). These are known as "scheduled" controlled substances or "scheduled" drugs.

Note that many prescription drugs, such as xylazine or atropine, are not controlled substances.

What are schedule numbers and DEA codes?

The federal government assigns each controlled substance a schedule number (I through V) according to its medicinal value, harmfulness, and potential for abuse or addiction. The DEA code is a 4-digit number assigned to each controlled substance. Find schedule numbers and DEA codes at the [DEA Web site](#).

A higher schedule number indicates the substance has more medicinal value and less potential for abuse or addiction. The letter "N" can also accompany the schedule number, signifying the substance is non-narcotic. If the DEA Web site has "N" in the NARC column, the item is non-narcotic and is denoted by the Roman numeral and an "N" (e.g., III N). If the DEA Web site has a "Y" in the NARC column, the item is narcotic and is denoted so by the absence of the "N" (e.g., III).

The most common controlled substances used in research, their schedule numbers, and their DEA codes are:

| Substance | Schedule | DEA Code |
|--|-----------------|-----------------|
| Buprenorphine | III | 9064 |
| Diazepam | IV N | 2765 |
| Ketamine | III N | 7285 |
| Pentobarbital (e.g., Nembutal) | II N | 2270 |
| Pentobarbital & non-controlled active ingredients (e.g., B-Euthanasia) | III N | 2271 |

What are “Listed” chemicals or “Precursor” chemicals?

Chemicals that can be used to manufacture a controlled substance. There are two Federal DEA lists, List I and List II, which differ by import/export/sales reporting thresholds. These lists can be found at http://www.deadiversion.usdoj.gov/21cfr/cfr/1310/1310_02.htm. The California list of precursor chemicals includes the DEA List I Chemicals plus some additional chemicals. California law requires campus vendors to uphold stringent regulations regarding sale and distribution of these chemicals. This list can be found at <http://ag.ca.gov/bne/pdfs/laws03.pdf>. Examples of listed chemicals include ephedrine hydrochloride, piperidine, and pyrrolidine.

What does the new UCSC Controlled Substance Program include?

The Controlled Substance Program includes new procurement procedures, a project registration process, a personnel authorization process, storage requirements, usage and inventory procedures, and disposal procedures (http://ehs.ucsc.edu/lab_research_safety/controlled_substances.php).

Are individuals using DEA “Listed” chemicals or California “Precursor” chemicals included in the Controlled Substance Program?

No. The requirements of the Controlled Substance Program apply only to DEA “scheduled” drugs.

What is the Controlled Substance Use Authorization (CSUA) form?

The Controlled Substance Use Authorization (CSUA) form documents the controlled substances used by the PI, the reason for this use, the storage location, and the project personnel who may contact the controlled substances. A CSUA form must be submitted to the Program Administrator (EH&S) and updated as appropriate each year.

What is the personnel Authorization form?

Diverting controlled substances from research purposes is one way controlled substances are acquired for illicit use. The Authorization form helps to identify people with a criminal history of controlled substance diversion or prior registration violations. The Authorization form also documents the individual's acknowledgement of responsibility to notify the Controlled Substance Program Administrator (EH&S) of any controlled substance loss or diversion.

How do I order Controlled Substances?

The Principal Investigator must determine the need for and sign all requisitions for Controlled Substances, regardless of dollar value. Purchase requests must be submitted through the CruzBuy system, using the DEA Controlled Substance form or the Hazardous Materials form, checking the "Controlled substance" box. The CruzBuy system requires EH&S approval on all controlled substance orders. No orders may be placed by departmental personnel directly with vendors and/or using a personal or UCSC credit card.

How do I order Listed/Precursor chemicals, such as iodine?

Contact Purchasing for assistance in meeting vendor requirements.

Where / how do I receive controlled substances?

Beginning July 1, 2009, authorized personnel may pick up controlled substances at the Student Health Services Pharmacy. You must have a Controlled Substance Authorization form on file with EH&S, with either the "Research Use and Pharmacy Pick-Up" or the "Pharmacy Pick-Up Only" box checked. *Photo ID will be required.*

How do I store controlled substances?

Controlled substance storage and use locations must be approved by EH&S. Controlled substances must be stored securely in a manner adequate for safeguarding, and should be separated from other drugs, chemicals or items. This practice will help to prevent loss by limiting access to only those who are assigned to work with controlled substances. It is recommended access be limited to as few researchers as possible. When in use, controlled substances should never be left unattended.

How do I store Controlled Substances during field work?

Controlled substances must be stored in a locked box either under direct control of an Authorized person or in a locked building or vehicle when not in use during field work.

How do I store Listed/Precursor chemicals?

Listed/Precursor chemicals must be stored according to hazard class, following the UCSC hazardous material storage requirements.

How long do I keep copies of my controlled substance use logs?

At least 2 years from the final disposition of the controlled substance. The logs must be readily available for periodic review by EH&S and/or the DEA.

Can I transfer controlled substances to another UCSC Authorized Principal Investigator?

Yes. Intra-campus transfer of a controlled substance will be approved by EH&S if the following criteria are met:

- The controlled substance must have been acquired under the UCSC DEA registration.
- The Authorized PI receiving the substance(s) must receive approval from EH&S for the transfer.
- Both parties maintain documentation of any approved transfer.

Can I transfer controlled substances to another individual at another University or institution?

No. Under no circumstances can controlled substances procured under UCSC's DEA registration be transferred to a non-UCSC individual.

What do I do with empty controlled substance containers?

Authorized personnel may dispose of empty controlled substance containers by defacing the label and discarding in the trash.

How do I dispose of expired or unused Controlled Substances?

Contact EH&S at 9-2553.

What is the campus-wide biennial inventory?

Every 2 years, each Authorized UCSC PI and/or research personnel must inventory their controlled substances during a one-day institutional inventory at either the opening or close of business (21 CFR §1304.11(b)). The Controlled Substance Program Administrator (EH&S) will select the exact date and time for the biennial inventory.

How do I report a loss or theft?

Authorized personnel are expected to report missing controlled substances to their supervisor, the Controlled Substance Program Administrator (EH&S), and the UCSC Police Department as soon as the loss is discovered. The Program Administrator and law enforcement will investigate the diversion, loss, or theft of Controlled Substances.

If any imminent safety threat exists, contact Public Safety directly at 911.

What are the consequences of engaging in illicit activities?

It is the position of the DEA that employees who possess, sell, use or divert controlled substances will subject themselves not only to State or Federal prosecution for any illicit activity, but shall also immediately become subject of independent action regarding their continued employment. UCSC will assess the violation and determine whether to suspend, transfer, terminate or take other action against the employee.

Who do I contact with questions?

Direct any questions regarding this program to ehs@ucsc.edu or call EH&S at 9-2553.