Lifespan System-wide Policy

Subject:
Use of Controlled Substances in Research

File Under:
ORA RRC 005

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Lifespan Office of Research Administration

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Approved by:

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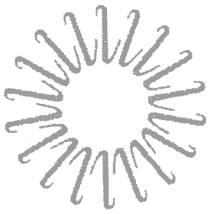
I. **Purpose**: The purpose of this Policy and Procedure Manual is to define and describe the policies and procedures regulating the use of controlled substances by research personnel at Lifespan

II. **Eligibility**: The entire research community of the Rhode Island Hospital, The Miriam Hospital, Emma Pendleton Bradley Hospital, Newport Hospital, collectively known as Lifespan for the purposes of this manual.

III. **Content**: The Manual is attached.



Lifespan

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USE OF CONTROLLED SUBSTANCES IN RESEARCH MANUAL

Questions about the information in this manual should be addressed to: jpoore@lifespan.org

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1.0 INTRODUCTION

This manual provides detailed information to define the responsibilities of the institution, facilities, and the Principal Investigator conducting animal research, teaching, or testing that uses controlled substances. Controlled substances are often used as the agent of investigation or for the provision of anesthesia, analgesia, sedation, or euthanasia necessary for procedures to be performed without pain or distress. In animal research, teaching, or testing, research staff may only use controlled substances under an approved Institutional Animal Care and Use Committee (IACUC) protocol that includes provisions for the use of specific controlled substances.

Principal Investigators (PI) conducting activities with Drug Enforcement Agency (DEA) controlled substances in basic and applied research settings must be licensed with the Rhode Island Board of Pharmacy and registered with the DEA.

All individuals shall comply with state and federal regulations regarding the acquisition, record keeping, inventory, storage, use, and disposal of those substances.

PIs using controlled substances in research must obtain a Rhode Island Board of Pharmacy Controlled Substance Registration and a DEA Registration prior to ordering or using controlled substances. Responsibilities associated with controlled substances are detailed and regularly enforced by both the State and the DEA. Those individuals not comfortable with assuming the responsibility and maintaining the required records are discouraged from applying for a registration. Delegation of the administrative responsibilities is permitted; however, only the DEA Registrant and Authorized Users have access to their inventory of controlled substances. Responsibility is individually based. Individuals who are fined or individuals who have violated the law will not be reimbursed by Lifespan nor defended for criminal actions.

The Sr. Vice President and Chief Research Officer is the Institutional Official (IO) with ultimate responsibility for ensuring appropriate conduct of research at Lifespan.

2.0 OFFICE OF RESEARCH ADMINISTRATION (ORA)

Questions about procurement, secure storage, use, disposal, required documentation, or regulatory questions regarding controlled substances in research should be directed to the Office of Research Administration Research Compliance Program Manager, the Attending Veterinarian, or the Pharmacy Management.

3.0 DEFINITIONS

Authorized User

An individual authorized to use controlled substances by a DEA Registrant. Appropriate training completion is required.

Controlled Substance

Any substance listed in the Controlled Substances Act, Code of Federal Regulations (21 CFR, part 1300 to end) and Title 54.1, Section 3400 of the State of RI General Laws. Controlled substances are identified in the schedules contained within the "Controlled Substance Inventory List" published by the DEA.

Controlled Substance Research Protocol

DEA requires a research protocol as part of the registration submission. In most cases, the Animal Care and Use Protocol approved by the IACUC will serve as the controlled substance research protocol. The Protocol must be consistent with 21 CFR 1301.18 for research

utilizing Schedule I Controlled Substances. For more information, refer to Section 7.3.

DEA Registrant
A Principal Investigator (PI) that holds DEA registration and is responsible for ordering, storing, using, recordkeeping, and disposing of controlled substances on his/her protocols. Appropriate training completion is required.

DEA Schedule I Research Protocol
A protocol to conduct research with Schedule I controlled substances in the form described in 21 CFR 1301.18.

Dispense
Prepare and distribute controlled substances to Authorized Users.

Disposal
Relinquishment of contaminated, expired, excess, residual (or waste) and unwanted controlled substances.

Drug Enforcement Administration (DEA)
The agency within the United States Department of Justice that enforces the controlled substances laws and regulations.

Expired and/or Unusable Substances
Controlled substances for which the expiration date has passed or tablets, injections, liquid, or preparations compounded in error which contain Controlled Substances that can no longer be used for research due to contamination, etc.

Institutional Animal Care and Use Committee (IACUC)
A committee made up of scientists and community members who ensure that research involving animal subjects is well planned and ethical. IACUC review and approval is required before any project using animals is initiated.

Institutional Official (IO)
The Sr. Vice President and Chief Research Officer.

Location
A room or designated area in a building where controlled substance inventory is stored.

Office of Research Administration (ORA)
The department responsible for oversight of all research conducted within Lifespan facilities.

Principal Investigator (PI)
The individual with final responsibility for the conduct of research or other activity described in a proposal or an award.

Registration
Formal grant of specific authority for controlled substance activities by the DEA and by the Rhode Island Board of Pharmacy. Often referred to as a license or certificate.

Research
A systematic investigation, including development, testing and evaluation designed to develop or contribute to generalizable knowledge.

Researcher
Any individual that conducts research at Lifespan.

Transfer
To move a controlled substance from the inventory of one DEA Registrant to another DEA Registrant.

Usage Log
A log kept by each DEA Registrant and authorized user of controlled substances tracking usage and maintained by the DEA Registrant for his/her records.

Rhode Island Board of Pharmacy
The agency authorized to implement and regulate Rhode Island Statutes, Board of Pharmacy Rules and Regulations, and to oversee the conduct and professional competency of Rhode Island Board of Pharmacy registrants.

4.0 CONTROLLED SUBSTANCE DEFINITIONS

Controlled substances are drugs or other chemicals that have the potential to be addictive or habit forming. The Drug Enforcement Administration (DEA) has divided controlled substances into 5 schedules based on their potential to be habit forming and usefulness in medicine as a drug. For a more comprehensive listing, see http://www.deadiversion.usdoj.gov/schedules/. Schedule VI substances are those identified by the State of RI General Laws and this scheduling designation is not utilized by the DEA.

- **Schedule I**
  Drugs or other substances that have a high potential for abuse; no currently accepted medical use in the United States and have a lack of accepted safety for use under medical supervision. Examples include: Heroin, LSD, Tetrahydrocannabinols (Delta-9-THC), Marijuana, Cathinone.

- **Schedule II**
  Drugs or other substances that have a high potential for abuse; currently have an accepted medical use in treatment in the United States, or have a currently accepted medical use with severe restrictions; abuse may lead to severe psychological or physical dependence. Examples include: Morphine, Cocaine, Amphetamine, Oxycodone, Methadone, Pentobarbital (Nembutal or Fatal Plus), Fentanyl.

- **Schedule III**
  Drugs or other substances that have a potential for abuse less than Schedule I or II; currently have an accepted medical use in treatment in the United States; abuse may lead to moderate or low physical and high psychological dependence. Examples include: Buprenorphine, Ketamine, Telazol, Euthasol (Pentobarbital/phenytoin mix).

- **Schedule IV**
  Drugs or other substances that have a low potential for abuse relative to those listed in Schedule III; currently have an accepted medical use in the United States; abuse may lead to limited physical or psychological dependence relative to those in schedule III.

Examples include: Tramadol, Phenobarbital, Diazepam, Midazolam.

- **Schedule V**
  Drugs or other substances that have a low potential for abuse relative to Schedule IV; currently have an accepted medical use in the United States; abuse may lead to limited physical or psychological dependence relative to those in Schedule IV. Examples include: Zolpidem, Zopiclone, Pregabalin, some Codeine cough preparations (*Robitussin AC*)

5.0 DOCUMENTATION

Using controlled substances requires specific documentation. Documentation must meet the requirements of all regulations. Sample forms to authorize specific users, maintain required inventory, and record use of controlled substances are included at the end of this manual. Use of these specific forms is strongly recommended as these templates incorporate the required elements from the applicable regulations. Any format used must meet the requirements of all regulations. Individuals should determine a consistent documentation process to ensure best compliance practices. Documents such as DEA 222 forms, Initial/Biennial Inventory, and Usage Forms must be maintained in original (wet ink) form. Required documentation must be available to DEA Investigators and others (i.e. IACUC, Attending Veterinarian) upon request.

6.0 WHO MUST REGISTER

Researchers that store, administer, or order controlled substances for research purposes must register with both the Rhode Island Board of Pharmacy and the DEA. The registrations must be for the laboratory and specific address where the controlled substances are stored. Registrants may authorize a limited number of individuals (i.e., Authorized Users) to access and administer controlled substances from the Registrant's inventory.

6.1 CURRENT REGISTRANTS HOLDING CLINICAL PRACTITIONER REGISTRATIONS

A Practitioner Registration from the DEA does allow for the following coincident activities: research and instructional activities with those substances for which registration was granted. Therefore, a Practitioner may conduct clinical research under their Practitioner Registration. A Practitioner is **not** authorized to manufacture or conduct chemical analysis (Note: Diluting a controlled substance to dosages needed for use in animal research is considered to be manufacturing.) A separate Research registration is required for these animal research activities.

7.0 REGISTRATION AND INSPECTION

It is the responsibility of each DEA Registrant to obtain appropriate annual licenses and registrations, and to adhere to applicable state and federal regulatory requirements when working with controlled substances. DEA Registrants shall not allow the registration to lapse until all controlled substances are utilized, disposed of, or transferred to another DEA Registrant.

7.1 RHODE ISLAND BOARD OF PHARMACY REGISTRATION

Each individual desiring registration must complete a Rhode Island Board of Pharmacy Application for Controlled Substance Registration Certificate. The online forms are here: http://health.ri.gov/applications/ControlledSubstances.pdf.

Inspection: Prior to issuance of a Controlled Substances Registration, Rhode Island Board of Pharmacy representatives may conduct an interview and inspection to ensure that appropriate safeguards are in place regarding controlled substances.

7.2 DEA REGISTRATION

A DEA Form 225 Application for Registration is required.

7.3 SCHEDULE I APPLICATIONS (rare)

Please be advised, schedule I controlled substances cannot be obtained through the Rhode Island Hospital Pharmacy.

Information regarding registering with DEA for use of Schedule I controlled substances in research is found here:
http://www.deadiversion.usdoj.gov/drugreg/reg_apps/225/225_instruct.htm.
DEA Registrants requiring the use of Schedule I substances must also include a DEA Controlled Substances Protocol which meets the requirements described in 21 CFR 1301.18 and included below:

1. Investigator:
    - Name, street address, building name and room number and DEA registration number; if any.
    - Institutional affiliation.
    - Qualifications, including a curriculum vitae and an appropriate bibliography (list of publications).

2. Research Project:
    - Title of project.
    - Statement of the purpose.
    - Name of the controlled substances or substances involved and the amount of each needed.
    - Description of the research to be conducted, including the number and species of research subjects, the dosage to be administered, the route and method of administration, and the duration of the project.
    - Location where the research will be conducted.
    - Statement of the security provisions for storing the controlled substances (in accordance with 21 CFR 1301.75 and for dispensing the controlled substances in order to prevent diversion.
    - If the investigator desires to manufacture or import any schedule I controlled substance, a statement of the quantity to be manufactured or imported and the sources of the chemicals to be used or the substance to be imported.

3. Authority:
    - Institutional approval. The Authorized Official must approve your registration application.
    - Approval of the Institutional Review Board for human studies.
    - Approval of the Institutional Animal Care and Use Committee for animal studies.
    - Indication of an approved active Notice of Claimed Investigational Exemption for a New Drug (number), if applicable.
    - Indication of an approved funded grant (number), if any.

7.4 SCHEDULE II-V APPLICATIONS (most common)

Schedule II-V applications can be completed online. The online forms can be found here:

http://www.deadiversion.usdoj.gov/drugreg/reg_apps/225/225_instruct.htm

7.5 INSPECTION

DEA Investigators may conduct a pre-registration interview with all pending DEA Registrants. Information or documentation that will be required is:

- Curriculum Vitae/Resume
- Copy of State License
- Copy of Certifications
- Summary of Controlled Substance Protocol (the IACUC approved Animal Care and Use Protocol can be used, if desired)
    - List of Controlled Substances to be used
    - Quantity of controlled Substance to keep on hand
    - List of Suppliers for Controlled Substances
    - How the Controlled Substances will be used in your research
    - Source of Funding
    - Length of Research
- List of people who will have access to the Controlled Substances
    - Full name
    - Home Address
    - Home Telephone Number
    - Date of Birth
    - Social Security Number
    - E-mail Address
- Supplier Source for the Animals (if applicable)
- Copy of the controlled Substances Log
- Copy of the Lab's floor plan
- Specifications for Safe or Controlled Substances storage cabinet (lock information)
- Lab/Area Security Summary

Once received, a copy of each license/registration should be submitted to the IACUC and the RIH Pharmacy for our records.

DEA and RI Board of Pharmacy research registrations remain active for a one (1) year period.

7.6 REGISTRATION IS LOCATION SPECIFIC

If a research registrant has more than one location (defined as separate street addresses) where controlled substances are maintained, administered, and/or dispensed, then a separate registration is required for each location. (21CFR 1301.12(a))

8.0 REGISTRATION CERTIFICATES

As each Registration Certificate is received, a copy should be sent to the IACUC and the RIH Pharmacy for our records.

8.1 REGISTRATION AMENDMENTS

DEA registrants may apply to modify his/her registration to authorize the handling of additional controlled substances or to change his/her name or address by submitting a written request to the Registration Unit, Drug Enforcement Administration, or submit on-line at www.apps.deadiversion.usdoj.gov/webforms/jsp/regapps/common/updateLogin.jsp

- New Drugs: Research registrations are approved for specific drugs. If you need to use a controlled substance that is not currently listed on your registration, then you must amend the registration to add this new drug.
- Change of Address: The address on the registration is the physical address of the storage location of the controlled substance. If the laboratory relocates and the controlled substance will be stored in a new physical location, approval by the DEA is required. If the modification is approved, the DEA will issue a new certificate of registration. The registrant should maintain the new certificate with the old certificate until expiration.

9.0 REGISTRATION RENEWALS

Annual renewals for both Rhode Island Board of Pharmacy and DEA research registrations can be completed online. The DEA will send a reminder notice approximately three (3) months prior to expiration. DEA renewals can be completed online at: https://www.deadiversion.usdoj.gov/webforms/jsp/regapps/common/renewalAppLogin.jsp

10.0 VETERINARY REGISTRATION

The Attending Veterinarian maintains a registration for veterinary controlled substances used for routine clinical care.

11.0 AUTHORIZED USERS

The DEA Registrant is responsible for managing the controlled substances in accordance with the requirements of the regulations including inventory, record keeping and security provisions. Authorized Users (designated employees) of the DEA Registrant may engage in approved activities under the direction of the DEA Registrant. The DEA Registrant is required to screen employees prior to authorization of work with controlled substances (See Section 12.0) and verify that training on Controlled Substances has been completed.

12.0 PERSONNEL SCREENING

The DEA Registrant should ensure that each potential Authorized User fulfills the screening process by completing the *Personnel Screening per* 21 CFR 1301.90. The screening includes the following questions:

1. Within the past five years, have you been convicted of a felony, or within the past two years, of any misdemeanor for offenses related to the illegal use, possession, or distribution of controlled substances?
2. In the past 3 years, have you knowingly used narcotics, amphetamines, or barbiturates other than those prescribed to you by a physician?
3. Have you ever been denied a DEA registration, had a DEA registration revoked or surrendered a DEA registration for cause?

If the answer to any of the questions is "yes", the person should not be allowed to sign the Authorized Users Signature Log and Human Resources (HR) should be contacted. Keep these questionnaires on file at the registered location

13.0 ROLES AND RESPONSIBILITIES

Office of Research Administration (ORA) Roles and Responsibilities:

The ORA / IACUC will:

- Provide guidance to researchers for registering with state and federal agencies
- Provide guidance on storage of controlled substances

- Provide guidance on disposal of controlled substances
- Establish policies and procedures for use of controlled substances

RIH Pharmacy Roles and Responsibilities:

- Comply with federal and state regulations
- Transfer controlled substances from the Pharmacy DEA registration license number to the Licensed Researcher's DEA number upon receipt of a properly completed DEA 222 Form.
- Conduct routine inspections to verify that controlled substances are stored in accordance with federal and state regulations

Registrants Roles and Responsibilities:

- Comply with federal and state regulations pertaining to the possession and use of controlled substances. The DEA Registrant is individually responsible for adherence to Rhode Island Board of Pharmacy regulations and DEA regulations.
- Obtain and maintain Rhode Island Board of Pharmacy and DEA registrations
- Obtain and secure DEA 222 Forms
- Maintain and file completed DEA 222 Forms separately from all other records for at least 2 years
- Provide and maintain documentation on training of laboratory-specific operations involving controlled substances
- Maintain strict control over inventory and security and ensure proper storage of controlled substances
- Obtain DEA approval, via amendment, for substances not currently approved under their Registration prior to ordering, inventorying, dispensing, or disposing of such substances
- Obtain and retain usage log sheets
- Maintain separate storage areas, logs and inventory for Schedule I controlled substances in their possession
- Maintain separate storage areas, logs and inventory for Schedule II controlled substances in their possession
- Maintain separate storage areas, logs and inventory for Schedule III-V controlled substances in their possession
- Order, receive, store, use, and dispose of controlled substances properly and continually maintain required documentation
- Maintain usage log sheets for 2 years after complete use or disposal of controlled substances
- Maintain all required documentation for at least 2 years
- Conduct an initial inventory
- Conduct a biennial inventory per DEA regulations. Schedule II inventory must be separate from inventory for Schedule III-V
- Report, in writing, the theft or significant loss of any controlled substance to the DEA Field Division (using Form 106), Rhode Island Board of Pharmacy, Providence Police, Hospital Security, and the IACUC within one (1) business day of discovery of such loss or theft
- Dispose of expired controlled substances, or those no longer supported by an active, approved protocol through a reverse distributor
- Upon receipt, send copy of registration, registration renewal or notice of lapse of registration to the IACUC
- Report DEA inspection and audit findings to the IACUC within 5 business days of notice received by DEA Registrant

Authorized Users Roles and Responsibilities:

- Review the Use of Controlled Substances in Research, Policy ORA RRC 005
- Complete the *Personnel Screening Form – Authorized User* before commencing use of controlled substances.
    - Sign the Authorized Users Signature Log
    - Complete usage log sheets
- Store controlled substances in approved locked cabinet or safe at the Registrant's Location
- Immediately report any discrepancy or suspected theft to the DEA Registrant
- Receive laboratory-specific training on procedures before using controlled substances

Immediately report to the DEA Registrant any felony violations/convictions.

14.0 TRAINING

The DEA Registrant must supervise their employees, students and other agents who assist them in activities (i.e. animal research) using Controlled Substances. Supervising personnel includes: explaining what and how Controlled Substances will be used in the Research; ensuring personnel are trained in Controlled Substances security and record-keeping procedures; and actively monitoring personnel's use of Controlled Substances in Research to ensure that this Policy and applicable laws/regulations are being followed.

15.0 ORDERING CONTROLLED SUBSTANCES

Registrants can only order controlled substances appearing on their current DEA registration. Controlled substances can be ordered from the RIH Pharmacy with a DEA order form 222, (DEA Form 222) completed in triplicate. The Registrant will keep copy 3 of DEA 222 Form (i.e. blue copy) and will forward DEA 222 Form copy 1 & 2 intact with carbon paper to the RIH Pharmacy. Schedule II controlled substances must be ordered on a separate DEA 222 Form from Schedule III-V.

Instructions for ordering DEA 222 Form can be found at:
https://www.deadiversion.usdoj.gov/webforms/orderFormsRequest.jsp

Blank DEA 222 forms must be securely stored. DEA 222 Forms are sequentially numbered, assigned to a specific registrant, and must be ordered from the DEA. This form is akin to a physician's prescription pad and should be maintained separately from the general log records.

15.1 NIDA DRUG SUPPLY PROGRAM

The National Institute of Drug Abuse (NIDA) Drug Supply Program (NDSA) provides various controlled drugs, other chemical substances, and marijuana and nicotine research cigarettes for research purposes to research investigators working in the area of drug abuse, drug addiction, and related disciplines at academic institutions. In order to obtain these substances from NIDA, research investigators and other users are required to submit their requests along with necessary documents to the NIDA drug supply program for consideration. Complete details can be found at:
http://www.drugabuse.gov/sites/default/files/files/OrderingGuidelinesUS.pdf.

Controlled substances must be ordered and maintained in the smallest quantity needed.

16.0 RECORD KEEPING AND INVENTORY REQUIREMENTS

Registered individuals are required to keep records, as described in the Controlled Substances Act. The following records should be maintained at the Registrant's Location (as identified on the registration):

- Results of personnel screening and training records for Authorized Users
- Executed order forms
- Receiving record that is verified, signed and dated
- Inventory records (must be kept a minimum of two years from date of last transaction)
- Schedule II records must be kept separate from Schedule III records.
- Controlled substance usage records (must be kept a minimum of two years from the date of last transaction)

All controlled substance records must be kept separately from all other records, in or near the primary work area, in an organized manner for easy review and verification of use, and shall be available for inspection by ORA/IACUC representatives, DEA, or state inspectors at all times.

The DEA Registrant may assign a Record-keeper to assist with record keeping requirements. The Record-keeper cannot dispense controlled substances.

16.1 CONTROLLED SUBSTANCE RECEIVING

Only the DEA Registrant or an Authorized User can receive (i.e. pick up) controlled substances from the RIH Pharmacy. Controlled substances transferred from the Pharmacy will be reconciled together by both parties (i.e. Pharmacist and Registrant /Authorized User) prior to controlled substances leaving the Pharmacy. Signature of receipt will be documented on DEA Delivery Form. Any discrepancies must be rectified before leaving the Pharmacy.

If controlled substances are picked up by an authorized user, then the verification process will be repeated between the Registrant and the Authorized User. If discrepancies cannot be rectified, the DEA Registrant must contact the ORA/IACUC and the DEA to report this within five business days.

Information that should be recorded immediately <u>when inventory is received</u>:

1. Date received
2. Name of medication
3. Formulation (e.g. tablets, injectable, patch)
4. Number of units (e.g. tablets, ml)
5. Lot number
6. Individually identified bottle (or other container)
7. Expiration date
8. Each unit/bottle/patch should be given an individual number so as to be easily tracked
9. Initials by individual receiving/documenting receipt of the drug

The DEA Registrant must complete required information on their copy of the DEA 222 Form (i.e. blue copy) upon receipt of controlled substances (i.e. NDC#, packages shipped, Date shipped, initial, and signature). The completed DEA 222 Form must be filed with the controlled substances records.

16.2 CONTROLLED SUBSTANCE DISPENSING AND TRACKING

Only the DEA Registrant or an Authorized User can dispense controlled substance from

inventory. From the time a controlled substance is received until it is fully used or disposed of, a record of the chain of custody and usage must be kept. Each point at which the controlled substance changes hands or is used must be documented. The documentation must be completed at each point by the Registrant dispensing the controlled substance and must include the substance, quantity and the signature of the authorized user or Registrant receiving it.

Every ml, mg, tablet, or patch of a controlled substance should be accounted for in the dispensing records.

Information recorded when drugs are used should include at minimum:

1. Date used (e.g., date withdrawn from bottle/vial)
2. Animal ID number (USDA species)
3. Quantity used/dose administered (e.g., amount withdrawn from bottle/vial (mLs), number of tablets, patches etc.)
4. Amount remaining in the container
5. Authorized User's initials
6. Additional information may include the protocol number, cage card number, and the reason for use

16.3 CONTROLLED SUBSTANCE TRANSFER

If needed and under limited circumstances, researchers with an active DEA registration can transfer small quantities to other DEA registrants at RIH. The transferor must ensure that the transferee has a valid DEA registration for the controlled substance Schedule and approved for the specific drug(s) to be transferred and approval, via an approved IACUC protocol to receive the substance.

Transfers must be accompanied by a DEA 222 Form completed by both registrants transferring and receiving the substance(s).

It is a felony to transfer a controlled substance to a person who is not registered with the DEA.

16.4 INVENTORY PROCEDURES

When issued a DEA registration, a registrant shall take an initial inventory, which is an actual physical count of all controlled substances in their possession. ***The Registrant should make a record showing a zero inventory upon initial receipt of registration.***
Each person registered to handle Controlled Substances must maintain an inventory. The inventory should be:

- Maintained at the registered location (unless a notification has been sent to DEA notifying that records will be maintained at a specified central location).
- Available for 2 years after the substance is used or is disposed.
- Completed every 2 years (biennial) to meet DEA regulations (21 CFR 1304.11). The inventory may be taken on any date which is within two years of the previous biennial inventory date and must indicate whether it was performed at the opening or closing of the day.
- Updated on the effective date of a rule (from the DEA) when a substance is added to the Schedule (list of controlled substances).

The inventory should have the following information:

- Name, address, and DEA registration number.

- Date the inventory was taken and whether it was at the beginning or end of the day.
- Signatures of person completing the inventory and the witness to the inventory process

Sample inventory forms will be provided by ORA.

Substances that are expired, damaged, defective or impure substances awaiting disposal must be included on the inventory until they are returned to the reverse distributor. ***See section 17.0 for disposal of expired controlled substances.***

16.5 LABELING REQUIREMENTS

All containers of controlled substances must be properly labeled. When a controlled substance is mixed with another agent (e.g. dilution of a drug with saline for accurate dosing, combination of compatible anesthetic agents) the new container should clearly state what substances are contained within and concentration of the "cocktail". The cocktail container should be labeled with its own unique ID and have a separate log sheet to track its use (administration) similar to all other log sheets for single agents. All record keeping that has been described in Section 16.1 must be performed for any controlled substance that is mixed with another agent. Cocktails are to be maintained for no more than 30 days after compounding.

The label on diluted or combined controlled substances must include the following information:

- Name of controlled substance(s)
- Lot number(s) from the supplier
- Final concentration of controlled substance(s)
- Volume per container
- Expiration date (30 days from the date of mixing/diluting).

16.6 STORAGE AND SECURITY

Regardless of schedule, all Controlled Substances must be kept in a substantially constructed, securely locked cabinet (safe) that meets DEA requirements, and accessible only to authorized personnel (*see samples below*). Controlled substances must be maintained behind a minimum of two locks (e.g. a locked container inside a locked cabinet).

- **For Schedule I**
  The Controlled Substance must be stored in a substantially constructed, securely locked cabinet (safe), separate from other scheduled controlled substances, with the cabinet secured to a wall or otherwise not removable, as per Federal regulations

- **For Schedule II**
  The Controlled Substance must be stored in a substantially constructed, securely locked cabinet (safe), separate from other scheduled controlled substances, with the cabinet secured to a wall or otherwise not removable, as per Federal regulations

- **For Schedules III-V**
  The Controlled Substance must be in a locked cabinet or safe.

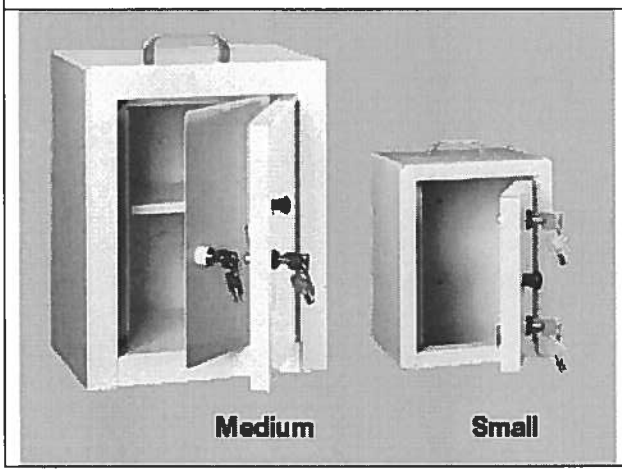
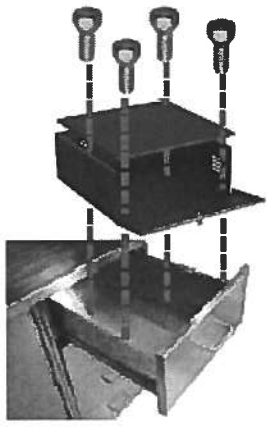
All controlled substances shall be kept locked in their storage location except for the actual time required to remove, legitimately work with, and replace them. You can find standard narcotic cabinets by searching for "narcotic cabinets" on the internet. Please be aware that DEA regulations require that the cabinet be secured so that it cannot be removed.

Some controlled substances may require refrigeration necessitating storage in a locked box secured (e.g. bolted) to the inner wall of a refrigerator.

Access to locked rooms and locked storage cabinets containing controlled substances shall be restricted by the DEA Registrant.

The key or combination to the "container" should be different from the key to the office or room where the drugs are stored. The two keys must not be stored together (cannot be on the same ring) and both keys must be safeguarded and accessible only to the registrant and authorized users listed on the Authorized Users List.

Each DEA Registrant must determine how their Authorized Users will access substances. Schedule I and II controlled substances must be kept separate from other controlled substances (i.e. schedule III Ketamine cannot be stored with Schedule II pentobarbital)

Sample narcotic safes for <u>Schedule I and II</u> controlled substances- must be bolted to the wall	**Sample locked storage for <u>Schedule III</u> controlled substances- bolted to a permanent structure**
	

17.0 DISPOSAL

Expired, damaged or otherwise unusable or unneeded controlled substances must be disposed of by transferring them to a DEA reverse distributor. The ORA will arrange to have a reverse distributor on-site twice a year, typically in conjunction with the IACUC's semi-annual facility inspection.

Expired or unusable substances must be labeled, separated, and stored in a cabinet or safe that meets DEA requirements for the highest level Schedule, until ready for disposal. Maintaining these substances in a separate box, or container, within the same cabinet where inventory is stored is acceptable. Please label the unusable or expired substances "Expired. Not for use in animals." to comply with IACUC inspections.

The Controlled Substances Inventory Record must be updated and copies of the records documenting the transfer, disposal, or reverse distribution of controlled substances must be maintained for a period of two years.

18.0 THEFT OR SIGNIFICANT LOSS

If theft is suspected, the DEA Registrant shall **immediately** notify ORA/IACUC, Hospital Security, Providence Police, and the DEA. The DEA requires that theft or significant loss of controlled substances be reported on DEA Form-106, Report of Theft or Loss of Controlled Substances. A copy of Form-106 must be kept in the disposition records.

If a container of a controlled substance is broken, it shall be documented in the record and a witness must sign and date it.

19.0 RHODE ISLAND BOARD OF PHARMACY AND DEA INSPECTIONS

The Rhode Island Board of Pharmacy normally will call to schedule a time for their inspections. The DEA can inspect an existing DEA Registrant at any time. In preparing for their inspections, the DEA will refer to their database for the list of substances approved for the DEA Registrant, so ensuring that DEA is notified via the amendment process is extremely important.
Substances in a DEA Registrant's inventory that do not match the DEA's database is cause for a finding.

If desired by a DEA Registrant, a representative from ORA will accompany DEA Registrants during Rhode Island Board of Pharmacy or DEA inspections. Contact ORA/IACUC to request a representative.

20.0 INSTITUTIONAL MONITORING

The Pharmacy and ORA/IACUC will review DEA Registrant records and facilities in accordance with its standard inspection schedule.

21.0 EMPLOYEE RESPONSIBILITIES TO REPORT DRUG DIVERSION

From 21 CFR 1301.91:

"Reports of drug diversion by fellow employees are not only a necessary part of an overall employee security program but also serve the public interest at large. It is, therefore, the position of DEA that an employee who has knowledge of drug diversion from his employer by a fellow employee has an obligation to report such information to a responsible security official of the employer. The employer shall treat such information as confidential and shall take all reasonable steps to protect the confidentiality of the information and the identity of the employee furnishing the information."

An employee who has knowledge of drug diversion associated with the actions of a fellow employee, student, or supervisor has an obligation to report such information to the ORA/IACUC or the Confidential Corporate Compliance Employee Response Line, at 1-888-678-5111 or sending a confidential e-mail to the corporate compliance officer via Lifespan's intranet at http://intra.lifespan.org/compliance/EmailForm.htm

21.1 CLOSE OUT OF REGISTRATION

Under no circumstances are controlled substances to be abandoned by a DEA registrant. DEA Registrants are expected to properly transfer or dispose of controlled substance inventory when controlled substances are no longer required or prior to departure from their position. Contact ORA/IACUC when preparing to close out.

Any person who is registered with the DEA who violates record-keeping requirements or abandons controlled substances will be subject to the civil penalties outlined in the United States Code (USC): 21 USC Sec. 842. Please note that abandoning substances is equivalent to distributing a controlled substance to an unauthorized person.

21.2 RETURN OF UNUSED DEA 222 FORMS

Upon termination of DEA registration, all unused DEA 222 forms must be returned to the nearest DEA office.

22.0 ACKNOWLEDGEMENTS

This manual contains content that was adapted from materials obtained from the University of Rhode Island, Penn State University, and Virginia Commonwealth University.

APPENDICES

1. Authorized Users List
2. Authorized User Screening Form
3. Initial Inventory form
4. Biennial Inventory Form
5. Generic Usage Log Sample

Controlled Substance Authorized User Signature Log

Each registrant must keep an updated form on file. Only individuals on this list should be granted access to controlled substances. The number of individuals who have access to controlled substances should be kept to the minimum necessary. Individuals who no longer have access to controlled substances should be crossed off the list and the date their access was terminated entered on the form. Each individual on the list must complete an Authorized User Screening Form.

Registrant Name:_____

Registrant Address (as stated in DEA Registration): _____

DEA Registration #: _____

Name	Job Title	Signature	Initials	Access Granted Date	Access Removed Date	Registrant's Initials

Lifespan Corporation

Authorized User of Controlled Substances in Research- Screening Form

As a security measure, the Drug Enforcement Agency requires registrants to screen individuals who will have access to controlled substances (as per 21 CFR Section 1301.90).

See also https://www.deadiversion.usdoj.gov/pubs/manuals/sec/employees.htm#screening

Lifespan Research Administration therefore requires that any individual who will be working with or have access to controlled substances as part of their employment fill out the attached attestation prior to being cleared for such a position. The Researcher ("Registrant") is responsible for ensuring that controlled substances are managed in accordance with regulations and institutional policy (e.g. inventory, record keeping, administration, security, etc.). The Registrant may delegate these activities in writing and authorize individuals ("Authorized Users" to have access to controlled substances if they are acting in the usual course of business or employment and are properly screened.

Instructions on how to use this form:

- Prior to allowing any individual to access controlled substances, the DEA Registrant must have the Authorized User applicant complete and sign the screening form.
- The form must be reviewed and approved by the Registrant to grant authorization status
- If an individual answers "yes" to any of the questions on the form the Authorized User applicant should not be allowed to sign the Controlled Substance Authorized User Signature Log and Human Resources should be contacted for further evaluation.

Maintaining Forms and Documentation:

- Registrants must maintain a list of authorized users.
- Screening forms must be filed in a secure location to maintain confidentiality of responses
- Authorized user screener forms and logs must be readily available upon inspection

Authorized User of Controlled Substances in Research- Screening Form

Registrant Name: _____

To comply with federal Drug Enforcement Agency regulations, Lifespan Corporation requires that all persons who will have access to controlled substances during work or research activities answer the following questions. By signing below, you authorize inquiries of courts and law enforcement agencies for possible pending charges or convictions. Any false information, omission of information, or misuse of controlled substances will jeopardize your position with Lifespan. Information included herein will not preclude employment but will be considered as part of the overall evaluation of qualifications for the applicant's ability to work with controlled substances. The protection of an individual's right to privacy will be upheld in all confidential inquiries.

Authorized User Applicant Information	
Name:	**Date of Birth:**
SSN:	
Home Address:	**Home Phone:**
Lab/Office Location:	**Work Phone:**
Email:	

1) Within the past five years, have you been convicted of a felony, or within the past two years, of any misdemeanor for offenses related to the illegal use, possession, or distribution of controlled substances?
   - ☐ No
   - ☐ Yes (specify or attach details of conviction, offense, location, and dater of sentence):

   _____

2) In the past three years, have you ever knowingly used any narcotics, amphetamines or barbiturates, other than those prescribed to you by a physician?
   - ☐ No
   - ☐ Yes (specify or attach details):

   _____

3) Have you ever had a controlled substance registration revoked, suspended or denied?
   - ☐ N/A
   - ☐ No
   - ☐ Yes (specify or attach details including date and reasons):

   _____

Authorized User Applicant Signature _____ Date _____

DEA Registrant Signature _____ Date _____

Please ensure this form is kept securely to maintain confidentiality of responses.

Controlled Substances Research Records

DEA Controlled Substance

Initial Inventory Form

Date of Inventory: Inventory Taken at Beginning of Business Day (date/time): _____

DEA Registrant: _____

DEA Registrant Address (as appears on DEA Certificate of Registration Form 223):

_____

_____

_____

DEA Registration #: _____

Signature of Registrant Reporting Inventory: _____

Witness: _____

I have NO Inventory of Controlled Substances at this time.

The DEA requires a physical inventory of all controlled substances to be conducted every two years (biennially) for each registered location (21CFR1304.11).

Keep the Inventory record at the licensed-registered laboratory location. The Inventory Form must be kept at least for an additional two years after completion.

Controlled Substances Research Records

DEA Biennial Controlled Substance Inventory Form

The DEA requires a physical inventory of all controlled substances to be conducted every two years (biennially) for each registered location (21CFR1304.11).

Date of Inventory: Inventory Taken at Beginning of Business Day (date/time): _____

DEA Registrant: _____

DEA Registrant Address (as appears on DEA Certificate of Registration Form 223):

_____

_____

_____

DEA Registration #: _____

Inventory Performed by: _____
Print Name **Signature**

Inventory Witness: _____
Print Name **Signature**

DEA Schedule *	Controlled Substance	Container Unit Type	Container Quantity	Container Volume (ml)	Concentration (mg/ml)

*****DEA Schedule is a 4-digit number, expressed in Roman Numerals I through V.

- **Complete a separate inventory sheet for each schedule class** *(e.g. Schedule II for Fentanyl, Pentobarbital, and euthanasia solution, Schedule III for Buprenorphine, Ketamine, and Telazol)*
- Separate inventory sheets must be completed for each DEA Registration #/location. For example, if one researcher has two DEA Registration #s (e.g., one for Coro West address and one for Middle House address) two initial/biennial inventories need to be completed. Inventories cannot be combined.
- List opened containers as separate line items. Unopened containers of same substance, manufacturer, volume, and concentration can be listed together on the same line.
- Cross out unused lines.
- Keep the Inventory record at the licensed-registered laboratory location. The Inventory Form must be kept at least for an additional two years after completion.
- Do not submit a copy of the biennial inventory to the DEA or State of Rhode Island unless requested.