

DEA CONTROLLED SUBSTANCES Management and Disposal

Presented by: Kathryn A. Johnson, CHMM
and Gina Agolia

What is a Controlled Substance?



- A specific, drug, chemical or immediate precursor regulated by the DEA due to its potential for abuse or addiction.
- Includes the salts, isomers, esters, and ethers of these chemicals.



U.S Drug Enforcement Administration (DEA)

- Established in 1973 under the US Department of Justice
- Responsible for the enforcement of the provisions of the Controlled Substances Act of 1970



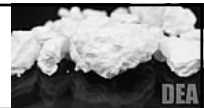
Relevant Regulations

- The Controlled Substances Act of 1970 established the foundation for the body of regulations that governs the production, transfer, and disposal of controlled substances.
- Current federal requirements can be found under 21 CFR 1300
- Controlled substances are also regulated at the state level (usually under the State Department of Health)

Drug Schedules

- Controlled Substances are Segregated into DEA Schedules I, II, III, IV, or V based on abuse potential, medical value, and the danger of serious physical effects to the user.

Schedule I



- More stringent requirements than materials listed in the four schedules.
- High Potential for abuse or addiction.
- Little or no commonly accepted medical use.
- Includes LSD, Ecstasy, Heroin.

Schedule II



- High Potential for abuse or addiction.
- Currently accepted medical value or medical use with severe restrictions.
- Includes Cocaine, Ritalin, and some Opiates.
- Slightly fewer requirements compared to Schedule I.

Schedule III-V



- Relatively lower potential for abuse or addiction.
- Currently accepted medical value.
- Includes Barbiturates, and Amphetamines.
- A more complete list can be found at <http://www.dea.gov/pubs/scheduling.html>

Exemptions



- Entities can apply to have certain formulations exempted from the regulations.
- 3 Lists of exempted materials
 - Anabolic Steroid Products
 - Chemical Preparations
 - Prescription Products



http://www.deadiversion.usdoj.gov/schedules/exempt/exempt_list.htm

Registration



- Registrants are classified under one of several types of business activities:
 - Practitioner, Manufacturer, Importer, or Researcher.
- You must register for every class of drug you intend to use.
- Many states also require a state registration.

Purchasing



- Only registered persons or entities may purchase DEA regulated materials.
- You can only purchase materials for specific schedules as established during the original registration application.

Storage and Security



- DEA drugs must be stored in a safe, or other secure location as specified in 21 CFR 1301.72 in order to prevent theft or diversion.
- Unaccounted loss of regulated materials must be reported immediately.

Tracking and Inventory



- An inventory must be maintained of all compounds managed under a specific registration number.
- Records must be kept onsite for at least 2 years.
- Maintain inventories and records of controlled substances listed in Schedules I and II separately from all other records.
- Inventories and records of controlled substances in Schedules III, IV, and V must be maintained separately or in such a form that they are readily retrievable from the ordinary business records of the practitioner.



Disposal



- **Watched Burn**
 - Witnessed incineration of the material.



- **Watched Flush**
 - May negatively impact local waste water systems.



Disposal Continued



- **Reverse Distributor** - another registrant takes possession of the unwanted material for eventual destruction.
- Other approved method as approved by the Special Agent in Charge to ensure that the material does not become available to unauthorized persons.

What does this mean to you?



- No one from your institution should take possession of controlled substances unless they are authorized to do so aka - they possess a federal and state registration have completed the necessary paperwork.



THE DRUG MARKET IS CONTROLLED BY GREEDY INDIVIDUALS AND ORGANIZATIONS WHO BELIEVE THEY CAN MAKE A BUCK OFF YOUR PHONES.

Orphaned Drugs



- Improperly Managed DEA Regulated materials may appear to be orphaned.
- Does the material contain a substance listed in schedules I-V?
- Is this an exempt preparation, steroid or prescription?
- Can this material can be linked to an existing DEA registrant?

Federal Field Offices



- **Boston** - 15 New Sudbury Street, Room 400E, Boston, MA 02203-0402
 - Jurisdiction: Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont
 - Diversion Number: (617) 557-2191
- **New York** - 99 Tenth Avenue New York, NY 10011
 - Jurisdiction: New York other than covered by Buffalo and Long Island
 - Diversion Number: (212) 337-1575
- **New York** - Buffalo - 28 Church Street, Suite 300 Buffalo, NY 14202
 - Jurisdiction: Western and Central New York
 - Diversion Number: (716) 551-3391
- **New York** - Long Island - 175 Pine lawn Road, Suite 205 Melville, NY 11747
 - Jurisdiction: Long Island
 - Diversion Number: (631) 420-4540



QUESTIONS?

Please feel free to contact me at any time for additional information or to request assistance in the proper management of Controlled Substances at your Institution.

Kathryn A. Johnson, CHMM
Technical Services Representative
kjohnson@triumvirate.com
1-800-966-9282

