




Controlled Substances and Dangerous Drugs Update

What is new?

Ask RCRA -January 18, 2023



Spread the
word- New
Webinar
Series!

We have a new webinar series,
**"Managing Controlled Substances &
Dangerous Drugs in Research."**

We have done three presentations; our
next one is on February 14 at noon.

Register at <https://bit.ly/3tOKeAd>

Find the recording of the presentation at
[https://rcra.emory.edu/oric/controlled-
substances/training.html](https://rcra.emory.edu/oric/controlled-substances/training.html)

Email us at oric@emory.edu if you want
to be added to the email list

- Definitions:
- a) **Controlled Substance** - The Controlled Substances Act (CSA) places all substances which were in some manner regulated under existing federal law into one of five schedules. This placement is based on the substance's medical use, potential for abuse, and safety or dependence liability. More information can be found in [Title 21 United States Code \(USC\) Controlled Substances Act Alphabetical List of Controlled Substances](#)
 - b) **Initial Inventory** - The Initial Inventory is to be completed at the Beginning of Business (BOB) or Close of Business (COB) upon receiving DEA Registration and prior to ordering controlled substances.
 - c) **Registrant** - A person licensed and registered with DEA to distribute, manufacture, administer, dispense, import, or export a Controlled Substance.
 - d) **Stock Bottle** - The container/bottle that was received from the supplier. The stock bottle has the original labels from the manufacturer.
 - e) **Working Bottle** - A chemical solution made for actual use in the lab, usually made from diluting or combining stock or standard solutions

- Box 1 Instructions: Registration Information
1. Complete the Registrant's Name, DEA #, and address in this section. The information must appear exactly (in its entirety), as it does on the Registrant's DEA License.
 2. Record the date the inventory occurred and the name of the person(s) conducting the inventory (two people are recommended).
 3. BOB/COB - Circle if the inventory was completed at the Beginning of Business (BOB) or Close of Business (COB). The inventory must be completed prior to the start of any daily activities or after the daily activities have been completed. There may be no movement of drugs during the inventory count.

- Box 2: Complete Physical Inventory for ALL Controlled Substance on hand at the time of inventory
1. This section is pre-filled out as there should not be any controlled substances on hand prior to the Registrant receiving the DEA Registration. The Controlled Substances on hand will always be zero.
 2. The Registrant must complete a separate Initial Inventory for Schedule I - II and Schedule III - V and maintain the inventory in the Registrant's DEA Ready Binder.

More Updated forms

We are updating our forms to ensure they are even more user-friendly by adding working instructions.

During our last webinar, we went through form 6 to document inventories in CS.

The webinars will also focus on the essential forms, so besides having the instructions, you will also have the recording on how to use the forms. The webinars will allow us to receive real-time feedback on the forms to make adjustments.

If your documentation needs are not served well with a form, contact us for help at oric@emory.edu

Sample Form 6B: Controlled Substances Inventory Continued
Annual Inventory Biennial Inventory _____ : Schedule III-V

Biennial inventory must be conducted once within every two years of the date of the Initial Inventory. An annual inventory is recommended for Schedule I & II and Schedule III - V Controlled Substances must be maintained. Stock and Working Bottles, and Expired Containers must be maintained.

Registrant Information

Name: <i>Joe</i>	DEA #: <i>RS1234567</i>	Registered Address: <i>123 Main Street, Atlanta, GA, 30325</i>		
Inventory:	<input checked="" type="radio"/> BOB / <input type="radio"/> COB* (circle one)	Name Persons conducting Inventory	Employee #1: <i>Joe Smith</i>	Employee #2:

Complete Physical Inventory for ALL Schedule III - V Controlled Substance on hand at the time of inventory

Name of Substance	Concentration/Strength	Initial Volume/Quantity of Container	Number of Containers	Total Quantity/Volume on Hand per Concentration/Strength	Stock/Working
<i>Epinephrine</i>	<i>100 mg/ml</i>	<i>10ml</i>	<i>3</i>	<i>30ml</i>	<i>stock</i>
<i>Epinephrine</i>	<i>100 mg/ml</i>	<i>10ml</i>	<i>1</i>	<i>10ml</i>	<i>stock</i>
<i>Epinephrine/Xylazine/Saline</i>	<i>20/30/ml</i>	<i>10ml</i>	<i>1</i>	<i>1.5ml</i>	<i>working</i>
<i>Testosterone</i>	<i>10mg</i>	<i>5g</i>	<i>1</i>	<i>3</i>	<i>stock</i>

A hand is shown in the foreground, resting on a wooden desk and using a computer mouse. In the background, a large, three-dimensional '@' symbol is made of cardboard. The scene is brightly lit, suggesting an office or classroom environment. A white circular graphic element is overlaid on the right side of the image, containing the text.

Questions?

Please get in touch with us at oric@emory.edu for any questions or requests.

You can also contact us individually at

- Danisha Biossat at danisha.biossa@emory.edu
- Maria Davila at maria.davila@emory.edu
- Margaret Huber at mhuber@emory.edu