# Working Instructions: Form2: Controlled Substance Access and Key Log

# Definitions:

1. Controlled Substance - The Controlled Substances Act (CSA) places all substances that 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](https://uscode.house.gov/view.xhtml;jsessionid=2C85B8DEBFB1BB15A7D31E29A34C3DAA?req=granuleid%3AUSC-prelim-title21&saved=%7CZ3JhbnVsZWlkOlVTQy1wcmVsaW0tdGl0bGUyMS1zZWN0aW9uODAx%7C%7C%7C0%7Cfalse%7Cprelim&edition=prelim) [Alphabetical List of Controlled Substances](https://www.deadiversion.usdoj.gov/schedules/orangebook/c_cs_alpha.pdf)
2. Registrant – A person licensed and registered with DEA to distribute, manufacture, administer, dispense, import, or export a Controlled Substance.
3. Access - For this form, access is determined by any person who administers, dispenses, receives, and/or destroys controlled substances under the Registrant’s license. These individuals all have access to controlled substances. It also includes anyone permitted to enter the drug storage area by way of key, keycard card access, combination code, etc.

# 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.

# Box 2: Instructions: Employee Access Log

1. Box 2 is used to document every employee who has access to controlled substances (see definition).
2. Record the employee’s name and the date access was granted.
3. Every person who has access to controlled substances should receive training on the proper handling of controlled substances. Training can be found here [Training | Emory University | Atlanta GA](https://rcra.emory.edu/oric/controlled-substances/training.html) and in eLMS.
4. Per Title § 21 CFR 1301.76(a), no Registrant may employ any individual who has a felony background related to controlled substances. This must be verified before the start of employment through Human Resources. Record the date the background check was completed.
5. If access is granted to the drug storage area that requires a key, then record the date the key was issued to the employee and have them initial that they received it.
6. Upon termination of employment, record the date the access was revoked and the date the key was returned. The Registrant must initial the key that was returned.
7. If additional pages are required, check the box at the bottom of the page.

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| FORM 2: Controlled Substance Access and Key Log Note: This form is to be used to record all individuals who have access to controlled substances and document the issuance and return of any keys. All designated personnel should review “Use of Controlled Substances in Research” at <https://rcra.emory.edu/oric/controlled-substances/training.html>   |  |  |  | | --- | --- | --- | | **Box 1: Registrant Information** | | | | **Registrant’s Name:** | **DEA #:** | **Registered Address:** | |
| |  |  |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | --- | --- | | **Box 2: Employee Access Log** | | | | | | | | | | **Employee Name** | **Access Given Date** | **Access Revoked Date** | **Training Date** | **Felony Background Check Complete (date)** | **Key Issued Date** | **Employee’s Initials - Key Issuance** | **Key Returned Date** | **Registrant’s Initials - Key Return** | |  |  |  |  |  |  |  |  |  | |  |  |  |  |  |  |  |  |  | |  |  |  |  |  |  |  |  |  | |  |  |  |  |  |  |  |  |  | |  |  |  |  |  |  |  |  |  | |  |  |  |  |  |  |  |  |  | |  |  |  |  |  |  |  |  |  | |  |  |  |  |  |  |  |  |  | |  |  |  |  |  |  |  |  |  | |

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| **Box 2: Employee Access Log** | | | | | | | | |
| **Employee Name** | **Access Given Date** | **Access Revoked Date** | **Training Date** | **Felony Background Check Complete (date)** | **Key Issued Date** | **Employee’s Initials - Key Issuance** | **Key Returned Date** | **Registrant’s Initials - Key Return** |
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