Introduction

Welcome to the Using Controlled Substances in Research, Teaching, and Veterinary Care at UAB (OHS_CS245) Course Material. If you are ordering or handling any scheduled substances in your research area, you must complete this course.

Objectives

At the conclusion, participants should be able to:

1. Define controlled substances and their schedules.
2. Apply rules and guidelines to stay compliant with DEA regulations.
3. Dilute, dispense, and dispose of controlled substances correctly.

Controlled Substances

UAB currently maintains a Memorandum of Agreement (MOA) with the Drug Enforcement Administration (DEA). This MOA governs the use of controlled substances for teaching purposes, veterinary care, and all non-human research.
The DEA defines controlled substances as:

- Chemicals whose manufacture and use is regulated by the DEA
- Highly addictive substances with medicinal properties
- Illegal drugs and prescription medicines
- Mind-Altering Substances
- Analgesics (Pain Control), Anesthetics, or Sedation

Controlled substances classifications are Schedules I through V. The DEA assigns substances their schedules based on a variety of factors. The criteria include:

- Abuse potential
- Pharmacological effect
- Medical value
- Likelihood of physical or psychological dependence
- The current pattern of abuse and other risk factors

**Examples**

- Schedule I: Heroin, LSD, and Ecstasy
- Schedule II: Methamphetamine, Cocaine, Oxycodone (Percocet)
- Schedule III: Hydrocodone, Anabolic Steroid, Tylenol with Codeine
- Schedule IV: Choral Hydrate, Barbital
- Schedule V: Donnagel with Paregoric, Robitussin with Codeine, Opium preparations
Compliance

DEA

The Federal Drug Enforcement Administration (DEA) is authorized to prevent, detect, and investigate legally manufactured controlled substances used in a research setting.

Authorization for Schedule I Substances is granted **directly by the DEA**. Authorizations for Schedule II-V Substances are granted from the [UAB Controlled Substances Program](#).

UAB

UAB has a Memorandum of Agreement (MOA) with the DEA that authorizes OH&S to issue Controlled Substance Use Authorization Numbers (CSUA) to individual researchers to use controlled substances for research, teaching, and veterinary care. OH&S is the administrator of the [UAB Controlled Substances Program](#) and required by the DEA to monitor the use and management of controlled substances in all non-hospital (non-clinical) areas.

Sharing

You must use only the controlled substances listed and bought on your CSUA. If you are collaborating with another researcher, he or she is **not** allowed to use your controlled substances unless he or she is an Authorized User on your CSUA.

Diversion

Diversion is the act of using a controlled substance obtained legitimately for illegitimate purposes. It is your responsibility to report any suspicious activity or missing controlled substances to the UAB Controlled Substance Program Manager as soon as possible. The police will prosecute any controlled substances used for illegitimate purposes. To report anonymously, call OH&S at (205) 934-2487.
Loss

Any damage, breakage of the bottle, or spilled substances must be reported to the UAB Controlled Substance Program immediately at (205) 934-2487. Breakage of a container or losing the material due to a spill must be witnessed, initialed, and dated by at least two lab members and certified by the PI.

Responsibilities & Expectations

1. Using only the controlled substances that are authorized and purchased through the UAB Controlled Substances Program.
2. Receiving authorization from OH&S before ordering or using controlled substances for research.
3. Consenting to a background check before being approved for a CSUA (PI’s and all users).
4. Completing a Personnel Screening Data Sheet (PSDS) before being approved for a CSUA.
5. Implementing the proper storage, record keeping, and disposal requirements for controlled substances.

Ordering

Do not create an order in iProcurement for controlled substances if you do not have the correct authorization. Only PI’s are allowed to apply for a CSUA. You must be listed as an Authorized User with ordering privileges on a CSUA to order controlled substances.

Place all orders for Schedule II-V substances through Occupational Health & Safety (OH&S). If you are new to creating requisitions in iProcurement, please take the Requisitions and Payment Requests course offered via the Learning Management System.

Once OH&S has reviewed and approved your order, the PI and Secondary will receive an automated email asking to verify the order. Once the order is placed and delivered to OH&S, the PI and Secondary will receive a second automated email saying that the order is available for pick up.
Pick-Up Instructions:

- Come to OH&S on Tuesdays and Thursdays 9am-11am. Special times are available on request. If you have any questions concerning controlled substances pick-up, contact OH&S at (205) 934-2487.
- You will need to bring your Driver’s License or Passport.
- You will receive a usage log when picking up the substance.

Handling

You should document every withdrawal of controlled substances from the container in the OH&S provided usage log and web application.

Disposal

When to Request

- A project closes or terminates, and a controlled substance is still in supply
- A CSUA expires, and renewal is not submitted
- The PI determines a controlled substance is no longer required
- The PI terminates employment
- The controlled substances expire

You can request disposal through the web application. It is unlawful for anyone to dispose of controlled substances without DEA approval and submittal of the proper form. Once the request is submitted, bring the item to the OH&S office. OH&S will provide documentation showing the transfer of material from the CSUA holder to OH&S. A copy of this document must be kept in the controlled substances binder and reflected in the usage log. Retain the usage log for three years from the date you indicated its disposal return to the Controlled Substances Program Manager.

Return all unwanted and expired controlled substances to Occupational Health & Safety (OH&S) for disposal. If you have questions about controlled substances disposal, contact the UAB Controlled Substances Program Manager at (205) 934-2487.
Storage

Contact OH&S at (205) 934-2487 before purchasing a storage unit to confirm it meets all DEA and OH&S requirements. Store controlled substances according to schedule number:

- Separate shelves are required for Schedule II and Schedule III–V drugs if stored together inside one safe.
  - **Schedule II**: Store in a safe or steel cabinet equivalent
  - **Schedule III-V**: Store in a locked drawer or cabinet that is inaccessible from above or below
- Do not transfer controlled substances from its original container for storage purposes. A controlled substance must have a label at all times with the original information from the manufacturer.
- Do not store other chemicals or supplies in a controlled substances storage unit.
- Do not store controlled substances in a corridor. Keep them under lock and key in an area inaccessible to the public.
- Do not share controlled substances storage facilities. You must have your unique storage unit for your drugs. If you are in a lab with shared space, each researcher must maintain his or her separate CSUA and storage units.
- Restrict access only to Authorized Users on your CSUA. Keep storage key(s) in the physical custody of Authorized Users at all times. Do not store keys in a drawer or on the wall.

Recordkeeping

Each PI issued a CSUA will receive controlled substance binder appropriate for the substance used. You are required to maintain all documentation in an OH&S issued controlled substances binder. If you have Schedules II-V, you are required to have separate binders for Schedule II Substances and Schedule II-V Substances.

The controlled substance binder must be immediately available at the time of an inspection or an audit. You should keep the binder with the controlled substances associated with it under lock and key in the same storage unit.
Divide each binder into the following sections required for using controlled substances at UAB.

1. CSUA approval (listing all Authorized User’s)
2. Usage log (including copies where the controlled substances were used or returned to the UAB Controlled Substances Program Manager for disposal)
3. Biennial inventory
4. All disposal or return documents
5. Training records
6. Supplemented documents

Lab Review

Lab reviews of your work area are conducted on a regular basis to prevent diversion and loss. You are also advised to perform a self-assessment of your work area to ensure DEA compliance. Lab reviews assess your security measures. You will be asked to make available all your documentation and grant access to all of your controlled substances.

Conclusion

This section concludes the Using Controlled Substances in Research, Teaching, and Veterinary Care at UAB (OHS_CS245) Course Material. You should now take the assessment. The passing score is 90% or higher.

Want to Learn More

OH&S has many training courses available to all UAB active employees and students. There is a decision tree to assist you in choosing the right course to match the knowledge or skills you need at work every day. If you have any questions or comments, contact OH&S at (205) 934-2487.