OFFICE OF RESEARCH CONTROLLED SUBSTANCES MONITORING PROGRAM

NEW U-M Research Registrant Controlled Substance Disposal Process for Schedules I/II Effective January 2017

U-M works with a company called Drug and Laboratory Disposal (DLD) which serves as a reversedistributor for disposal of controlled substances used by DEA research registrants in support of their non-clinical research. DLD coordinates with the U-M Department of Environmental Health & Safety (EHS, formerly OSEH) to schedule controlled substance pickups. *The new disposal procedure for Schedules I and II controlled substances is as follows (changes are in bold):*

- 1. Complete the <u>DLD Controlled Substance Inventory List¹</u>. This DLD form will now contain a field for the required DEA registrant name.
- 2. The Inventory List form is to be either a) scanned and emailed to EHS, or b) completed online via the EHS Waste and Supply Request webpage.
- 3. The EHS representative will contact you to schedule a date and time for pickup.
- DLD transcribes the data from your <u>DLD Controlled Substance Inventory</u> onto a <u>DLD Chain of</u> <u>Custody Form²</u> and a <u>DEA Form 222³</u>. They will bring these forms with them to your scheduled pickup.
- 5. During the pickup, DLD personnel verify the controlled substances to be picked up against the <u>DLD Chain of Custody form</u>. If changes are needed, a new <u>DLD Chain of Custody Form</u> is completed immediately.
- 6. You, as the DEA registrant or authorized personnel, will complete the *Supplier* section of copy 1 (brown copy) of the <u>DEA Form 222</u>.
- 7. You must inspect the *entire* <u>DEA Form 222</u> (including the *Purchaser* section, which will have been pre-completed by DLD), and the <u>DLD Chain of Custody Form</u>, for mistakes. If there are <u>DEA Form 222</u> errors, the form with the errors is voided and a new <u>DEA Form 222</u> will be created immediately. The DEA registrant is ultimately responsible for proper completion of the DEA Form 222.
- 8. Sign the <u>DLD Chain of Custody Form</u>, obtain a copy for your records, and file in your binder.
- 9. Separate the DEA Form 222 copies. Keep copy 1 (brown supplier copy) and file in your binder with the <u>DLD Chain of Custody Form</u>, and give copy 2 (green DEA copy) to the EHS representative who will then mail it to the DEA.

Contact <u>cs-monitors@med.umich.edu</u>, or 734-764-2003, with questions about this process.

¹ <u>DLD Controlled Substance Inventory List</u>- An inventory form that is filled out by the laboratory to record all

controlled substances that need to be picked up by DLD. This form is sent to EHS to start the disposal process. ² <u>DLD Chain of Custody Form</u>- A document completed by DLD from the information provided by the lab on the

Controlled Substance Inventory Form. This document is the receipt for your pickup, and must be copied and filed in your binder after signing.

³ <u>DEA Form 222</u>- A DEA form that is required when schedule I or II controlled substances are being 'transferred' from one registrant to another (i.e., purchase from a supplier or transfer of expired controlled substances to the reverse-distributor).

Controlled Substances Inventory List



Job # (DLD USE)	
DEA Registrant	Phone Number
Address	DEA Registrant #
City State Zip Code	U of M CSR #

Substance / Strength	Schedule (I-V)	National Drug Code (NDC)	Reporting NDC (DLD USE ONLY)	Number of Containers	Container Size	Actual Amount

Submit by Email

SAMPLE ONLY (Brown Copy)

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SAMPLE ONLY





Drug & Laboratory Disposal, Inc.

Date:

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Destroyed at DLD By:						Date:		Time:	

331 Broad Street, Plainwell, MI 49080 · Phone: (269) 685-9824 · Fax: (269) 685-1130 · www.dld-inc.com

Destruction Witnessed By: