

# UConn

## CONTROLLED SUBSTANCES POLICY

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| Controlled Substances Policy |   |
|------------------------------|---|
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| <b>Contact:</b>              | <b>EHS Chemical Health and Safety Manager</b>   |

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## Controlled Substances Policy

### I. PURPOSE

The purpose of the Controlled Substances Policy is to ensure that registrants and authorized lab workers using drugs, immediate precursors, or other substances regulated under the Controlled Substances Act (CSA) comply with Code of Federal Regulations (CFR) Title 21, Food and Drug Act (§1300-END) enforced by the Drug Enforcement Administration (DEA) and state regulations enforced by the Connecticut Department of Consumer Protection, Drug Control Division (CT-DCP).

### II. SCOPE

The Controlled Substances Policy applies to all individuals involved in the procurement, registration, recordkeeping, security, storage, usage, and disposal of unused, expired, and waste-containing controlled substances at the Storrs and regional campuses, except for Student Health Services, UConn Health, and the UConn Police Department.

### III. POLICY STATEMENT

The University of Connecticut is committed to providing a healthy and safe work environment for all activities under its jurisdiction and complying with all applicable federal, state, and local safety regulations and standards. Department heads, principal investigators, laboratory managers, lab workers, and other authorized individuals all share the responsibility for minimizing personnel exposure to controlled substances, correcting violations identified during inspections, and complying with the requirements in the Controlled Substances Policy.

#### IV. ENFORCEMENT

While Environmental Health and Safety serves as a resource regarding the proper management of controlled substances, the registrant is responsible for maintaining and complying with all federal and state requirements. Failure to comply with applicable DEA and CT-DCP regulations may result in criminal prosecution and civil penalties as well as disciplinary measures in accordance with University Laws and By-Laws, [General Rules of Conduct for All University Employees](#), applicable collective bargaining agreements, and the [University of Connecticut Student Code](#).

#### V. CONTROLLED SUBSTANCE SCHEDULES

Controlled substances are drugs, immediate precursors, or other substances regulated under the CSA by both the federal DEA and the CT-DCP. The DEA classifies controlled substances into five schedules based on their medicinal value, harmfulness, risk to public health, and potential for abuse and/or addiction. Schedule I controlled substances are the most restrictive. A comprehensive list of controlled substances, DEA drug code numbers, and CSA schedules is available on the [DEA website](#). A summary of the DEA schedules, descriptions, and examples of controlled substances is listed in Table 1.

**Table 1. Controlled Substance Schedules**

| Schedule | Description  | Examples   |
|----------|--|--|
| I.       | Substances with no currently accepted medical use in the United States, a lack of accepted safety for use under medical supervision, and a high potential for abuse. | Heroin, Marijuana, Lysergic Acid Diethylamide (LSD), Methaqualone                                      |
| II.      | Substances with a high potential for abuse which may lead to severe psychological or physical dependence.  | Adderall, Cocaine, Fentanyl, Hydromorphone, Methadone, Methamphetamine, Meperidine, Oxycodone, Ritalin |

|      |  |  |
|------|--|--|
| III. | Substances with a potential for abuse less than substances in Schedules I or II and abuse may lead to moderate or low physical dependence or high psychological dependence.      | Anabolic steroids, Tylenol with codeine, ketamine, testosterone, buprenorphine |
| IV.  | Substances with a low potential for abuse relative to substances in Schedule III.  | Xanax, Soma, Valium, Ativan, Talwin, Ambien, Tramadol                          |
| V.   | Substances with a low potential for abuse relative to substances listed in Schedule IV and consist primarily of preparations containing limited quantities of certain narcotics. | Lomotil, Motofen, Lyrica, Parepectolin   |

## VI. LIST I AND II REGULATED CHEMICALS

The DEA also regulates [List I and List II chemicals](#). Listed chemicals are chemicals that can potentially be used in the illicit manufacturing of controlled substances. List I chemicals typically represent precursor reagents while List II chemicals represent solvents that can be used in the synthesis and purification of controlled substances.

The DEA requires manufacturers, distributors, importers, and exporters to maintain records of the manufacture and distribution of List I and List II chemicals. Manufacturers and distributors may require purchasers of List I chemicals to provide additional information (e.g., an authorized purchaser form, letter of intended use, etc.) prior to completion of the order. Additional information may be required for List II chemicals that exceed certain order frequencies or threshold quantities.

Lab personnel are not required to maintain controlled substance registrations to purchase listed chemicals. The storage and recordkeeping requirements for controlled substances are not applicable to listed chemicals. List I and List II chemicals must be stored with other compatible chemicals by hazard class as indicated in the [University Chemical Hygiene Plan](#).

## VII. DEFINITIONS

- **Annual Inventory [Formerly the Biennial Inventory]**- an annual inventory of all controlled substances present in the lab that shall be conducted within four days of the first day of May of the calendar year.
- **Authorized Lab Worker**- an individual acting on behalf of or at the direction of a registrant regarding the ordering, usage, management, and disposal of controlled substances.
- **Controlled Substance**- a narcotic or non-narcotic drug, other substance, or immediate precursor, included in [Schedules I, II, III, IV, or V](#).
- **Controlled Substance Units**- a single controlled substance unit shall be the equivalent of one hundred tablets or capsules, one pint of a liquid, one multiple dose vial, ten suppositories, ten single dose ampules or other single dose package forms for injection whether powder or in solution.
- **Department of Consumer Protection- Drug Control Division (CT-DCP)**- a state agency that works to protect the health and safety of Connecticut residents by regulating all persons and firms involved in the distribution of legal drugs, medical devices, and cosmetics in Connecticut.
- **Drug Enforcement Administration (DEA)**- a federal agency tasked with enforcing the controlled substances laws and regulations of the United States.
- **Laboratory**- a room approved by the CT-DCP entrusted with the custody and use of controlled substances for the purposes of instruction, research, or analysis.
- **Precursor Chemical**- a substance whose principal compound can be used or produced, primarily as a chemical intermediary, in the manufacture of a controlled substance.
- **Registrant**- a practitioner, principal investigator, laboratory manager, or other person authorized to order, dispense, and manage controlled substances under their DEA and CT-DCP registrations.



## **VIII. RESPONSIBILITIES**

Individuals overseeing or working in laboratories with controlled substances are responsible for following the guidelines listed in the Controlled Substances Policy. The responsibilities of each position are outlined below:

### **A. UNIVERSITY CHEMICAL HYGIENE OFFICER (CHO)**

**[EHS Chemical Health and Safety Manager]**

- Develops, reviews, and updates the Controlled Substances Policy and Controlled Substances training.
- Verifies the controlled substance registrations for each registrant are up to date prior to approving orders.
- Develops, reviews, and provides oversight to controlled substance inspections to ensure lab personnel comply with regulations and University standards.
- Provides information to registrants and authorized lab workers to ensure work involving controlled substances is carried out in compliance with federal and state regulations and the Controlled Substances Policy.

### **B. REGISTRANT**

- Complies with the requirements of the Controlled Substances Policy.
- Ensures Controlled Substances Training and the appropriate chemical safety training(s) are completed by all authorized workers, including the registrant, prior to the management of controlled substances.
- Provides a copy of their federal DEA registration to EHS upon initial approval and renewal.
- Informs EHS, DEA, and CT-DCP prior to relocating controlled substances to a new location.
- Maintains accurate, up-to-date records of controlled substances.
- Stores controlled substances in accordance with all DEA and CT-DCP regulations.
- Notifies CT-DCP and DEA when authorized lab workers are added or removed from having access to controlled substances.
- Ensures that records for Schedule I and II controlled substances are kept separate from Schedules III, IV, and V.
- Ensures that controlled substances and records acquired under separate DEA registrations are kept in separate locations.

- Keeps accurate usage records of controlled substances from **stock solutions** and **working solutions**.
- Provides training to authorized lab workers that addresses the hazards, controls, work practices, personal protective equipment (PPE), and emergency procedures specific to work with controlled substances.
- Provides appropriate personal protective equipment identified in the **Workplace Hazard Assessment** to authorized lab workers for work with controlled substances.
- Ensures authorized lab workers properly collect, label, manage, and dispose of controlled substances and wastes.
- Contacts EHS for disposal of controlled substances.
- Completes an **annual inventory** as directed by EHS.
- Reports all thefts, burglaries or other losses of controlled substances to the **Drug Enforcement Administration**, Drug Control Division ([DCP.DrugLoss@ct.gov](mailto:DCP.DrugLoss@ct.gov)), the **UConn Police Department**, and **EHS** upon discovery.
- Reports lab-related accidents, injuries, and/or emergencies involving controlled substances to **EHS** and **Human Resources**.

### **C. AUTHORIZED LAB WORKER**

- Reviews and follows policies, procedures, and work practices outlined in the Controlled Substances Policy and other lab-specific procedures.
- Completes Controlled Substances Training and the appropriate chemical safety training(s) prior to the management of controlled substances.
- Uses engineering, administrative, and work practice controls to minimize exposure to controlled substances.
- Wears appropriate personal protective equipment as specified in the **Workplace Hazard Assessment**, safety data sheets (SDSs), or other applicable documentation.
- Receives approval from the registrant prior to conducting work involving controlled substances.
- Notifies and consults with the registrant prior to making changes to previously approved procedures involving controlled substances.
- Properly orders, manages, labels, stores, and maintains records of controlled substances and wastes.
- Reports unsafe conditions and near misses to the registrant.
- Adheres to all University, departmental, and laboratory-specific safety policies, procedures, and directives.

## D. ENVIRONMENTAL HEALTH AND SAFETY

- Maintains and updates the Controlled Substances Policy.
- Conducts controlled substance inspections to ensure regulatory compliance.
- Provides guidance for controlled substance registration.
- Provides training regarding controlled substances.
- Communicates with DEA and CT-DCP on compliance issues.
- Assists registrants and authorized lab workers with compliance.
- Maintains records of controlled substance registrations.
- Coordinates transfers and disposals of controlled substances with CT-DCP and DEA.
- Notifies registrants to complete their annual inventory each year.

## IX. TRAINING

The Occupational Safety and Health Administration (OSHA) requires that training be provided to all employees at the time of initial assignment to a work area where hazardous chemicals are present and prior to assignments involving new exposure situations. Registrants and authorized lab workers must complete Controlled Substances Training through [HuskySMS](#) prior to work with controlled substances. The training covers the following topics:

- The location and details of the Controlled Substances Policy;
- Responsibilities;
- Registration and Renewals;
- Usage;
- Recordkeeping;
- Thefts, Burglaries and Other Losses; and
- Disposal.

In addition, individuals performing protocols or experiments in laboratories with controlled substances are required to complete either the initial or refresher version of the Laboratory Safety and Chemical Waste Management Training each year. Individuals using controlled substances to provide veterinary care for vertebrate animals (e.g., veterinarians, Animal Care Services) are required to complete, at a minimum, Hazard Communication and Personal Protective Equipment training. Individuals can register for trainings and check training histories through [HuskySMS](#). The specific types of training required for individuals working with controlled substances are indicated in Table 2.

**Table 2. Training Requirements**

| <b>Training</b>                          | <b>Principal Investigators, Lab Managers, Lab Workers</b> | <b>Practitioners, Veterinarians, Animal Care Services</b> |
|--|---|---|
| Controlled Substances                    | X   | X   |
| Lab Safety and Chemical Waste Management | X   |   |
| Hazard Communication                     |   | X   |
| Personal Protective Equipment            |   | X   |

**X. REGISTRATION AND RENEWALS**

Practitioners, principal investigators, and laboratory managers must register and be approved for work with controlled substances by both the CT-DCP Drug Control Division and the DEA. The CT-DCP registration should be completed and approved first.

State and federal regulations require separate CT-DCP and DEA registrations for each location where controlled substances will be stored. If controlled substances will be used in different rooms within the same building, but will only be stored at one location, registrations must only reflect the storage location. If controlled substances will be stored in more than one building or will be stored in more than one location within the same building, separate CT-DCP and DEA registrations are required for each building and/or storage location. The following procedures must be carried out when applying for controlled substance registrations with the CT-DCP and DEA:

## A. STATE REGISTRATION

1. Complete the applicable CT-DCP Application:
  - a. Registrants working in laboratories that use controlled substances for research purposes must complete the [Controlled Substance Laboratory Registration](#).
  - b. Registrants administering, distributing, or procuring controlled substances in the course of their professional practice (e.g., medical doctors, veterinarians, etc.) must complete the [Controlled Substance Practitioner Registration](#).
2. Pay the initial application CT-DCP fee.
3. Retain a copy of the application.
4. Verify or track the [registration](#).
5. CT-DCP will arrange to inspect the laboratory or work area. Inspection criteria can be reviewed on the [CT-DCP website](#).
6. Applicants approved by CT-DCP will receive either a State of Connecticut Controlled Substance Laboratory Registration or a State of Connecticut Controlled Substance Practitioner Registration.
7. Controlled substance registration certificates must be maintained at the registered location and be kept available for official inspection.

## B. FEDERAL REGISTRATION

1. Complete the applicable DEA Application:
  - a. Registrants working in laboratories that use controlled substances for research purposes must complete [DEA Form 225](#).
  - b. Registrants administering, distributing, or procuring controlled substances in the course of their professional practice (e.g., medical doctors, veterinarians, etc.) must complete [DEA Form 224](#).
2. Pay the initial DEA registration fee.

**Note:** UConn registrants are exempt from paying the federal fee. Registrants must complete **Section 6** on the form to claim the exemption. The [EHS Chemical Health and Safety Manager](#) must be used as the certifying official.
3. Retain a copy of the registration certificate.
4. Verify or track the registration by calling 1-800-882-9539 or the [DEA Field Office](#).

5. Upon approval, DEA will issue a Certificate of Registration and it must be maintained at the registered location in a readily retrievable manner and kept available for official inspection.

### C. MODIFICATIONS, TRANSFERS, OR TERMINATIONS OF EXISTING REGISTRATIONS

1. Contact the [EHS Chemical Health and Safety Manager](#) with the proposed changes.
2. EHS will contact the CT-DCP and/or DEA and provide the proper forms to the registrant to modify, transfer, or terminate an existing registration.

**Note:** Transfers of controlled substances are allowed on a case-by-case basis among registrants if proper registration, storage, and security measures are verified and approved by CT-DCP and/or DEA. Transfer of controlled substances from UConn registrants to other individuals outside of UConn is not allowed.

### D. REGISTRATION RENEWAL

1. State Renewal
  - a. Controlled Substance Laboratory Registrations will expire annually on January 31<sup>st</sup> and require renewal through CT-DCP. CT-DCP will contact the registrant via email or regular mail 30-45 days prior to the expiration date on the registration. State registrations can be renewed on the [State of Connecticut's eLicense Website](#).
  - b. Controlled Substance Practitioner Registrations expire every two years on February 28th of odd numbered years. CT-DCP will contact the registered practitioner via email or regular mail 30-45 days prior to the expiration date on the registration. Practitioner registrations can be renewed on the [State of Connecticut's eLicense Website](#).
  - c. Registrants must report any changes to email or mailing addresses to [dcp.licenseservices@ct.gov](mailto:dcp.licenseservices@ct.gov).
2. Federal Renewal
  - a. DEA controlled substances registrations will expire each year for registrants using controlled substances for research purposes. DEA will send an electronic reminder to renew at 60, 45, 30, 15, and 5 days prior to the expiration date to the email address associated with the registration. Registrants are required to complete [DEA Form 225a](#) to renew their registration.

- b. DEA controlled substances registrations will expire every 3 years for registered practitioners. DEA will send an electronic reminder to renew at 60, 45, 30, 15, and 5 days prior to the expiration date to the email address associated with the registration. Registrants are required to complete [DEA Form 224a](#) to renew their registration.

**Note:** UConn's Federal Tax Identification Number for renewal is 06-0772160.

- c. DEA allows the reinstatement of an expired registration for one calendar month after the expiration date. If the registration is not renewed within that calendar month, an application for a new DEA registration will be required.
- d. Federal law prohibits the handling of controlled substances or List 1 chemicals for any period of time under an expired registration.

## **XI. PURCHASING CONTROLLED SUBSTANCES**

Controlled substances are a restricted item by the [Purchasing Department](#). Registrants may only purchase controlled substances for schedules listed on their DEA and CT-DCP registrations and may only use them for approved medical or scientific research purposes indicated in their registrations.

Purchase orders for Schedule I and II controlled substances must be submitted using [DEA Form 222](#). Registrants may purchase Schedules III, IV, and V controlled substances by providing copies of their controlled substance registrations to the supplier, vendor, or manufacturer. Manufacturers and distributors of controlled substances are required to verify that registrants are registered and authorized to use the specific schedule(s) of controlled substances being ordered.

### **A. HUSKYBUY**

Controlled substances are a restricted item and must be purchased through [HuskyBuy](#) using Commodity Code 920. The [EHS Chemical Health and Safety Manager](#) will confirm that the registrant's CT-DCP and DEA registrations are current and verify that the controlled substances being ordered are approved under their registrations. Registrants must provide current copies of registration certificate(s) to EHS, if EHS does not have updated records on file. If registrants meet the requirements, EHS will approve orders through HuskyBuy.

## **B. PROCUREMENT CARDS (PRO-CARDS)**

Controlled substances are a **restricted commodity** through the Purchasing Department and may not be purchased with procurement cards. All requisitions for controlled substances should be placed through **HuskyBuy**.

## **XII. SECURITY AND STORAGE**

Controlled substances must be stored in compliance with **federal** and **state** regulations. Registrants must maintain controlled substances in a secure area or location that is only accessible to authorized personnel. Registrants must provide access to the minimum number of workers essential for efficient operation. If a lab is shared between two or more registrants using controlled substances, separate approved storage devices and records must be maintained. The following guidelines for security and storage of controlled substances are required:

### **A. SECURITY**

- Controlled substances must be maintained in a secure area such as a locked safe, steel cabinet, or other suitable storage device approved by CT-DCP and/or DEA.
- Approved storage devices must always remain locked, unless actively adding or removing controlled substances.
- All controlled substances must be double locked to prevent theft. A laboratory door that is locked when authorized personnel are absent can serve as one of the locks. The lock on the safe, cabinet, or other approved storage device can serve as the second lock.
- Keys must never remain in an approved safe or other storage device.
- Keys to approved safes or other storage devices must be stored in a location that is only accessible to registrants and authorized lab workers.
- Controlled substances being used must be immediately returned to the approved storage location upon completion of each process.
- Authorized lab workers must monitor maintenance personnel or other visitors occupying areas where controlled substances are stored.

### **B. STORAGE**

- Schedule I and II controlled substances, except for barbiturates used solely for sedative or anesthetic effects on animals and in a quantity not more than ten



controlled substance units, require greater storage requirements than Schedules III, IV, and V.

- Safes for Schedule I and II controlled substances approved after January 1, 1975, must meet the following requirements:
  - Minimum of a B burglary rate;
  - Equipped with a relocking device;
  - Weight of 750 pounds or more or rendered immobile by being securely anchored to a permanent structure of the building;
  - Adequate interior space to store all controlled substances required to be kept within the safe; and
  - Approved by CT-DCP.
  
- Schedules III, IV, and V controlled substances must be stored in a safe, a lock box that is bolted down, a locked top drawer to a cabinet that is bolted down, or another suitable storage device and be approved by CT-DCP.
- The minimum quantity of controlled substance(s) to maintain efficient operation must be stored.
- No additional chemicals can be stored with controlled substances.
- Expired controlled substances must be separated from non-expired controlled substances within the approved storage device and be clearly labeled as expired.
- All controlled substances in original containers must maintain the product label.
- Controlled substances in secondary containers used for working solutions must be labeled with the chemical name(s) and the applicable GHS pictogram or hazard class(es).
- If theft, burglary, or other loss of controlled substances has occurred, the Commissioner of Consumer Protection may require additional safeguards for storage.

Failure to comply with federal and state storage requirements may result in seizure of controlled substances by the Commissioner of Consumer Protection.

### **XIII. RECORDKEEPING**

Registrants are required to generate and maintain records of all transactions regarding the receipt, usage, management, and disposal of controlled substances. Copies of controlled substance records must be kept in a secure location, separate from other records, and be written in English. Records must be made available for inspection by

federal and state officials for a period of three years following the usage or disposal of the controlled substances.

The CT-DCP Drug Control Division recommends storing controlled substance records in two separate binders. EHS has set up binders to meet the CT-DCP criteria and will provide them to registrants upon request. Table 3 lists the recordkeeping contents required in each controlled substance binder.

**Table 3. Recordkeeping Storage Requirements**

| <b>BINDER 1</b> |  |
|-----------------|--|
| <b>Section</b>  | <b>Contents</b>  |
| <b>1.</b>       | Usage Records- Stock Solutions   |
| <b>2.</b>       | Usage Records- Working Solutions   |
| <b>BINDER 2</b> |  |
| <b>Section</b>  | <b>Contents</b>  |
| <b>1.</b>       | DEA and CT-DCP Controlled Substance Registration Certificates  |
| <b>2.</b>       | Annual Inventory Records   |
| <b>3.</b>       | Receipt Records located <b>in separate sections</b> within Section 3<br><ul style="list-style-type: none"> <li><b>a.</b> Schedule I receipt invoice(s), if applicable, with executed DEA 222 form attached</li> <li><b>b.</b> Schedule II receipt invoice(s), if applicable, with executed DEA 222 form attached</li> <li><b>c.</b> Schedule III-V receipt invoice(s), shipping document(s), or packing slip(s)</li> </ul> |
| <b>4.</b>       | Lab Worker Authorization Records   |
| <b>5.</b>       | Records of Surrender or Disposal   |
| <b>6.</b>       | Inspection Reports   |
| <b>7.</b>       | Protocols  |
| <b>8.</b>       | Completed Records from Binder 1  |
| <b>9.</b>       | Regulations- State of Connecticut  |

**A. USAGE RECORDS**

Registrants and authorized lab workers must maintain usage records to account for controlled substances administered for research or teaching. A separate usage record must be maintained for the administration of controlled substances from a **stock**

solution (e.g., ketamine) and those mixed with other chemicals to make a working solution (e.g., a mixture of ketamine and xylazine). Each usage record must include the following information:

1. Name of the registrant;
2. Name of the controlled substance;
3. Strength (e.g., 5mg, 5mg/ml);
4. Form of controlled substance (e.g., tablet, liquid, powder etc.);
5. Date of administration/usage;
6. Protocol number/Description of use;
7. Beginning total quantity (i.e., number of units or volume);
8. Quantity used (i.e., number of units or volume);
9. Quantity wasted (i.e., number of units or volume);
10. Remaining total quantity on hand (i.e., number of units or volume); and
11. Signature of the registrant or authorized lab worker.

Usage records from stock solutions must be kept in Section 1 of Binder 1. Usage records for working solutions must be kept in Section 2 of Binder 1. The remaining total quantity of each usage record must match the total physical quantity of controlled substance(s) on hand. Records must be retained in the lab for three years from either the date of disposal or the date the entire substance was used up.

## **B. REGISTRATION CERTIFICATES**

Each registrant must maintain up-to-date controlled substance registrations with the DEA and the CT-DCP. An updated copy of each controlled substance registration certificate must be maintained in Section 1 of Binder 2.

## **C. ANNUAL INVENTORY RECORDS**

Registrants must complete an annual inventory (including expired bottles, unopened/partially-opened containers, working solutions, and wastes) of all controlled substances in possession within four days of the first day of May of the calendar year. New registrants must also complete an initial inventory when controlled substances first enter the work area. EHS will send out a notification in April of each year making registrants aware of the requirement.

Schedule I and II controlled substances must be listed together and on a separate annual inventory from Schedules III-V. Registrants with no controlled substances on hand must still complete the inventory to confirm that no controlled substances are in their possession. The annual inventory must be kept on file in Section 2 of Binder 2 for three years and be readily available for inspection upon request by DEA, CT-DCP, or EHS.

#### **D. RECEIPT RECORDS**

Registrants must maintain a receipt record for each controlled substance. When controlled substances are received, the quantity of each controlled substance on the receipt record must be circled and the record must be signed and annotated with a date and time of receipt by the registrant or authorized lab worker. This step is required to verify the controlled substance was received and that the information on the record was correct. Registrants or authorized lab workers must then immediately relocate the controlled substance to the approved storage location. Receipt records for Schedule I and II controlled substances must be stored separately in Section 3a (Schedule I) and 3b (Schedule II) of Binder 2 and include:

1. Copy of the invoice (if applicable); and
2. DEA Form 222.

Receipt records for Schedule III, IV, and V controlled substances must be stored in Section 3c of Binder 2 and include:

1. Copy of the invoice;
2. Copy of the shipping document; or
3. Copy of the packing slip.

#### **E. LAB WORKER AUTHORIZATION RECORDS**

Registrants and lab workers are responsible for completing the [Lab Worker Authorization Form](#) to identify and allow workers access to controlled substances. The form acknowledges an agreement between the registrant and lab worker to comply with federal and state regulations and University requirements regarding controlled substances. The form must be stored in Section 4 of Binder 2 and be updated when lab workers are added or removed from access to controlled substances.

## **F. RECORDS OF SURRENDER OR DISPOSAL**

Registrants and/or authorized lab workers are responsible for properly disposing of controlled substances. When expired or unwanted controlled substances must be removed from approved storage locations, registrants must contact the [EHS Chemical Health and Safety Manager](#) to coordinate disposal with CT-DCP. EHS will escort a CT-DCP agent to the lab, witness the destruction of the controlled substances with the registrant or authorized lab worker, and complete the [State of CT-Department of Consumer Protection Drug Control Division Record of Surrender or Disposal Form](#). A copy of the disposal form will be provided to the registrant or authorized lab worker upon completion. Registrants must keep the record in Section 5 of Binder 2 for three years.

## **G. INSPECTION REPORTS**

The DEA and/or CT-DCP will conduct initial inspections of labs or work areas to ensure controlled substances will be properly secured, stored, and managed on-site. Upon completion of their inspection, CT-DCP will provide an inspection report to the registrant. A copy of the initial inspection report and any other subsequent inspections by CT-DCP or DEA must be stored in Section 6 of Binder 2.

In addition, EHS will conduct inspections to ensure the proper management and storage of controlled substances. EHS will provide inspection reports to registrants through [HuskySMS](#). Inspection reports issued by EHS do not require storage in Binder 2.

## **H. Protocols**

Registrants must provide the front page of the protocol or procedure approved by DEA and CT-DCP and all relevant pages that describe the usage of controlled substances. The pages must be available in Section 7 of Binder 2.

## **I. COMPLETED RECORDS FROM BINDER 1**

Once the usage records from stock solutions or working solutions from Binder 1 have been completed, the forms must be relocated to Section 8 of Binder 2. Completed usage records must be stored for 3 years.

## **J. REGULATIONS- STATE OF CONNECTICUT**

A copy of [Sections 21a-262-1—21a-262-10](#) of the Regulations of Connecticut State Agencies (RCSA) entitled the “Minimum Security and Safeguard Requirements for Storage and Handling of Controlled Substances” was included in Section 9 of Binder 2 by EHS. All registrants and authorized lab workers are responsible for maintaining and complying with the regulations.

#### **XIV. THEFTS, BURGLARIES, OR OTHER LOSSES**

Registrants and authorized lab workers are required to provide adequate control against the diversion, theft, and loss of controlled substances. Suspected misuse or theft of controlled substances must be reported upon discovery to:

1. [Drug Enforcement Administration](#) within 24 hours;
2. Commissioner of Consumer Protection ([DCP.DrugLoss@ct.gov](mailto:DCP.DrugLoss@ct.gov)) within 72 hours;
3. [UConn Police Department](#); and
4. [Environmental Health and Safety](#).

If theft, burglary, or other loss of controlled substances has occurred, the Commissioner of Consumer Protection may require additional safeguards for storage. If controlled substances are lost or destroyed through breakage of a container or other accident, the registrant shall make a signed statement detailing the accident and the quantities lost. The statement shall be forwarded to the Commissioner of Consumer Protection and a copy must be retained by the registrant.

**Controlled Substance Usage Record- Stock Solution**

(Use a separate usage record for each stock solution)

| CONTACT INFORMATION   |  |  |               |                 |                                  |   |
|-----------------------|--|--|---------------|-----------------|----------------------------------|---|
| Registrant:           |  | Jonathan Husky                         |               |                 |                                  |   |
| Controlled Substance: |  | Ketamine                               |               |                 |                                  |   |
| Strength and Form:    |  | Example: 10mg tablet or 10mg/ml liquid |               |                 |                                  |   |
| Date                  | Protocol Number/<br>Description of Use | Beginning Total Quantity               | Quantity Used | Quantity Wasted | Remaining Total Quantity on Hand | Signature of Registrant/<br>Authorized Lab Worker |
| Example:<br>07-01-21  | A99-999                                | 15ml                                   | 5ml           | 0.5ml           | 9.5ml                            | Jane Doe  |
| 07-05-21              | A99-999                                | 9.5ml                                  | 3ml           | 0 ml            | 6.5ml                            | John Doe  |
| 07-05-21              | A99-999                                | 6.5ml                                  | 5ml           | 0.5ml           | 1ml                              | Jane Doe  |
|                       |  |  |               |                 |                                  |   |
|                       |  |  |               |                 |                                  |   |
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Controlled Substance Usage Record- Working Solution  
 (Use a separate usage record for each working solution)

| CONTACT INFORMATION   |  |  |               |                 |                                  |   |
|-----------------------|--|--|---------------|-----------------|----------------------------------|---|
| Registrant:           |  | Jonathan Husky                         |               |                 |                                  |   |
| Controlled Substance: |  | Ketamine and xylazine                  |               |                 |                                  |   |
| Strength and Form:    |  | Example: 10mg tablet or 10mg/ml liquid |               |                 |                                  |   |
| Date                  | Protocol Number/<br>Description of Use | Beginning Total Quantity               | Quantity Used | Quantity Wasted | Remaining Total Quantity on Hand | Signature of Registrant/<br>Authorized Lab Worker |
| Example:<br>07-01-21  | A99-999                                | 15ml                                   | 5ml           | 0.5ml           | 9.5ml                            | Jane Doe  |
| 07-05-21              | A99-999                                | 9.5ml                                  | 3ml           | 0 ml            | 6.5ml                            | John Doe  |
| 07-05-21              | A99-999                                | 6.5ml                                  | 5ml           | 0.5ml           | 1ml                              | Jane Doe  |
|                       |  |  |               |                 |                                  |   |
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Controlled Substances Annual Inventory Record  
 (Use a separate line for each container)

| CONTACT INFORMATION                   |  |  |   |              |
|---------------------------------------|--|--|---|--------------|
| Registrant Name:                      |  | Date:  |   |              |
| DEA Registration #:                   |  | CSL #:   |   |              |
| Time:                                 |  | <input type="checkbox"/> AM<br><input type="checkbox"/> PM | <input type="checkbox"/> Open of Business<br><input type="checkbox"/> Close of Business |              |
| Person Completing Inventory:          | Print Name   | Signature:   |   |              |
| Schedule(s):                          | <input type="checkbox"/> I and II (Must use separate record) |  | <input type="checkbox"/> III, IV, and V   |              |
| CONTROLLED SUBSTANCE ANNUAL INVENTORY |  |  |   |              |
| Controlled Substance                  | Form   | Strength   | Quantity  | Comments     |
| Example: Ketamine HCl                 | Solution   | 100mg/mL   | 10 mL   | Unopened MDV |
|                                       |  |  |   |              |
|                                       |  |  |   |              |
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- Add more lines as necessary.

Controlled Substance Lab Worker Authorization  
(Registrants must update this form when access to controlled  
substances are permitted or withdrawn to lab workers)

**AUTHORIZED LAB WORKER ACKNOWLEDGEMENT**

I agree to complete required trainings and comply with all federal and state regulations and University requirements regarding controlled substances.

| Lab Worker Name (Print) | Net ID | Signature | Date |
|-------------------------|--------|-----------|------|
|                         |        |           |      |
|                         |        |           |      |
|                         |        |           |      |
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- Add more lines as necessary.

**REGISTRANT AUTHORIZATION**

I authorize the lab worker(s) listed above to access, use, and manage controlled substances under my Drug Enforcement Administration and CT Department of Consumer Protection registrations.

|                          |  |             |  |
|--------------------------|--|-------------|--|
| Registrant Name (Print): |  |             |  |
| Registrant Signature:    |  |             |  |
| Building:                |  | Lab Number: |  |
| Date:                    |  |             |  |

Keep a copy of this form in Section 4 of Binder 2