

A ll USC DEA Registrants are required to maintain accurate usage records and inventories for controlled substances (CS) per terms of their DEA licenses. Inaccurate, incomplete, or missing logs may result in suspension of the license as well as DEA-imposed penalties (see [Controlled Substances Act - Control and Enforcement](#)).

USAGE AND INVENTORY OF CS FOR RESEARCH

1. Generate a usage and disposal log for each CS using [CS Form B - CS Usage & Disposal Log](#). Ensure that your CS dilutions each have their own [CS Form B-1 – CS Dilution Usage & Disposal Log](#) as well.
 - a. Confirm that the CS has a unique alphanumeric ID.
 - b. Complete all fields in the “Information” section of form.
 - i. Complete the “Dilution Table” for CS Form B-1, if necessary
2. Record each use of a controlled substance.
 - a. Record amount used, transferred, and/or disposed of, and remaining balance after each use.
 - i. Ensure date of use/transfer/disposal is recorded.
 - ii. Authorized User name must accompany each entry.
 - iii. Physical amount in container must match the usage logs AT ALL TIMES.
 - iv. Store CS Usage & Disposal Logs with physical CS inventory.
 - b. Refer to the [Waste Disposal of Controlled Substances Fact Sheet](#) for details on how to dispose of CS.
3. Document transfer of CS into or out of inventory.
 - a. Request approval of transfer from EH&S by completing [CS Form E - Controlled Substances Transfer](#). NOTE: CS can only be transferred between two registrants with valid DEA registrations and CSUA.
4. Keep initial and annual physical inventory forms for all CS.
 - a. Complete [CS Form C Annual Physical Inventory](#) to document CS in your possession.
 - b. Keep copies of your DEA registration and EH&S-approved Controlled Substance Use Authorization (CSUA) application with your physical CS inventory.

WHAT I NEED TO KNOW

- All DEA registrants are responsible for proper use and secured storage of controlled substances.
- CS Usage & Disposal Logs must be updated as CS is used and must be stored with controlled substances. Retain for at least two years following disposal.
- Immediately Inform EH&S of theft or loss of CS and complete [CS Form F – Controlled Substance Incident Report](#).

STORAGE

- Must have two means of locked security [e.g., room with a locked door and locked durable cabinet or locked durable cabinet with a locked safe box].
 - a. Schedule I-II drugs must be kept in locked drug safe, vault, or steel cabinet attached to the building structure, within a lockable room.
 - b. Schedule III-V drugs must be kept in a locked, substantially constructed cabinet without wheels, within a lockable room.
 - i. Schedule III-V drugs may be stored with Schedule II drugs given that the security standard for Schedule II drugs is maintained.
 - c. Keep and maintain Schedule I-II records separately from Schedule III-V records.
- Only DEA registrants and Authorized Users may have access to CS.

NOTIFICATION

Report the theft or loss of controlled substances immediately.

- Call DPS at 213-740-4321.
- Notify EH&S immediately at 323-442-2200 or ehs-cs@usc.edu.
- Complete [CS Form F – Controlled Substance Incident Report](#) and submit to ehs-cs@usc.edu.
- A follow-up investigation will be initiated by EH&S.



REFERENCES [21 CFR Part 1304 - §1304.04 Maintenance of records and inventories](#) [§1304.11 Inventory requirements](#)
[21 CFR Part 1301 - Security Requirements](#)