

U.S. Drug Enforcement Agency Frequently Asked Questions

What receiving records must a practitioner/physician maintain if they plan on maintaining a stock of controlled substances for dispensing and administering to their patients?

If the controlled substance is in Schedule II, procurement must be accomplished by using the DEA Form 222. If the drug preparation is in Schedule III through V, then a readily retrievable invoice is sufficient. These records should contain the date, drug type, dosage form, etc. The prescriber should also maintain an inventory of the drugs received and dispensed or administered.

What is meant by "readily retrievable?"

The term means that the record is kept or maintained in such a manner that it can be separated out from all other records in a reasonable time and/or that it is identified by an asterisk, redline or some other identifiable manner such that it is easily distinguishable from all other records.

Are there any special security requirements that a practitioner/physician should take if they plan on maintaining a stock of controlled substances in their office for dispensing and administering?

All controlled substances should be stored in a locked cabinet or other secure storage container with limited access by the office staff.

What reports must be filed if a practitioner/physician experiences a theft or significant loss of controlled substances?

All thefts and any significant losses must be reported to the DEA immediately upon discovery of the theft or loss. Notification must be accomplished by completing and filing a DEA Form 106, *Report of Loss or Theft*. The form may be found on the Internet at www.DEAdiversion.usdoj.gov or may be obtained from your local DEA office. If the circumstances regarding the theft or loss need clarification before the form can be completed, the registrant can make an initial report via telephone or some other means and file the completed form as soon as the circumstances are known.

Is it appropriate to provide a DEA registration number on prescriptions written for medications other than controlled substances?

DEA strongly opposes the use of a DEA registration number for any purpose other than the one for which it was intended, to provide certification of DEA registration in transactions involving controlled substances. The use of DEA registration numbers as an identification number is not an appropriate use and could lead to a weakening of the registration system. Although DEA has repeatedly made its position known to industries such as insurance providers and pharmacy benefit managers, there is currently no legal basis for DEA to prevent or preclude companies from requiring or requesting a practitioner's DEA registration number.

In response to concerns of practitioners and professional organizations, DEA and several medical associations joined together in a Consensus Statement opposing inappropriate use of the DEA registration number. The [Consensus Statement](#) declares the use of the DEA

registration number for uses other than its original intent inappropriate. The Statement also encourages the Secretary of Health and Human Services to accelerate implementation of the national provider identifier system, mandated by the Health Insurance Portability and Accountability Act of 1996.

As a DEA registrant, how do I report breakage or spillage of controlled substances?

Breakage of controlled substances does not constitute a "loss" of controlled substances. When there is breakage, damage, spillage or some other form of destruction, any recoverable controlled substances must be disposed of according to DEA requirements. Damaged goods may be disposed of through shipment to a "reverse distributor" or by a DEA approved process. The DEA recommends that any registrant seeking to dispose of controlled substances first contact the nearest DEA Diversion Field Office for disposal instructions. In no case should drugs be forwarded to the DEA unless the registrant has received prior approval from the DEA.

If the breakage or spillage is not recoverable, the registrant must document the circumstances of the breakage in their inventory records. Two individuals who witnessed the breakage must sign the inventory records indicating what they witnessed. The submission of a DEA Form 41, *Registrants Inventory of Drugs Surrendered* is not required for non-recoverable controlled substances.

The DEA procedures established for the destruction of controlled substances shall not be construed as altering in any way the state laws or regulations for the disposal of controlled substances. When this disposal occurs, it must be reported to the DEA on a DEA Form 41.

How do I obtain additional Official Order Forms, DEA Form 222?

There is no charge for Official Order Forms. Official Order Forms may be ordered by calling the DEA Headquarters Registration Unit toll free at (800) 882-9539 or the nearest DEA Registration Field Office. The forms will be mailed within 10 working days. Official order forms may also be obtained by submitting a completed requisition form, DEA Form 222a, to:

DEA
Registration Unit
PO Box 28083
Washington, DC 20038-8083

Courtesy of DEA website April 25, 2005.