

Animal Researchers and Controlled Substances

Controlled substances are frequently used in animal research for anesthesia, pain relief, and humane euthanasia. Increased oversight on the part of state and federal authorities has resulted in the requirement for PIs to seek their own licenses to obtain, possess, and administer controlled substances. In Wisconsin, researchers must have a Drug Enforcement Agency (DEA) registration (federal) and a Controlled Substance Special Use Authorization (SUA) (state). State Controlled Substance SUA must be obtained before applying for DEA registration.

Federal DEA Registration

- PIs can apply for DEA registration on-line at <http://www.deadiversion.usdoj.gov/>
- Registration applications can also be submitted by mail—forms are available at the above website
- There is no fee for UW PIs—just select “exemption from application fee”
- The certifying official is the Associate Dean for Research in the PI’s school or college
- PIs must fill out Form 225—can either be submitted online or by mail
- PIs must be registered for specific drugs—in other words, researchers can only purchase and use specific controlled substances for which they are licensed
- Registration lasts 3 years

State Controlled Substance SUA

- PIs can obtain forms and information about applying for SUAs online at <http://drl.wi.gov/prof/cont/form.htm>
- Researchers must use the “Application for Research, Analytical Laboratory, Industrial/Commercial Procession, Instructional Activities and Other for Controlled Substances” form
- There is no fee for employees of state institutions
- Application forms must be mailed—there is no online application process
- PIs must have an SUA for specific drugs and amounts of drugs—they are not permitted to purchase or possess more than the SUA stipulates
- Submitted applications will be reviewed by the State Controlled Substances Board
- SUAs must be renewed **annually**
- It is **strongly** suggested that you confer with your research animal veterinarian before you submit your application

Lockbox information

- Physical security requirements for controlled substances can be found at <http://drl.wi.gov/dept/forms/form2277.pdf>
- Locked drawers or cabinetry are NOT adequate
- Approved double locking cabinets for controlled substances can be ordered through Health Care Logistics at 1-800-848-1633, or www.healthcarelogistics.com, item #3707-01, slim line narcotic cabinet

Recordkeeping

- DEA requires that a complete inventory of controlled substances in your possession must be completed at least every 2 years, including:
 - When inventory was conducted
 - Names of controlled substances
 - Finished form of controlled substances (e.g., 3 mg/ml solution)
 - Number of dosage units in finished form in the commercial container (e.g., 10 ml)
 - Number of commercial containers
 - Disposition of controlled substances (e.g., administered to animals, outdated and returned to reverse distributor [for disposal])
 - Inventory can be kept via paper or electronic records
- Must keep records of all controlled substances that are administered to animals, include animal ID, dose, concentration of drug, time, date, and who administered drug
- Records must be kept at least 2 years and be readily retrievable

Disposal

- Outdated/expired controlled substances can be disposed by the campus Environment, Health and Safety Department
- Contact number for disposal service and disposal information is 5-5519; the contact persons are Greg Zukowski or Troy Vannieuwenhoven

For further information and assistance with this process, please contact your research animal veterinarian or RARC trainers (www.rarc.wisc.edu).