RARC Guidelines for Animal Researchers: Controlled Substance Registration & Security Requirements

Current regulations require researchers to obtain their own registrations to purchase, possess, and administer controlled substances.

In Wisconsin, researchers must have both a federal Drug Enforcement Administration (DEA) registration and a Controlled Substance Special Use Authorization (SUA) issued by the State of Wisconsin Controlled Substances Board. The SUA must be obtained BEFORE applying for DEA registration.

State Registration

- Researchers must use Form #2184 “Application for Controlled Substances Special Use Authorization”.
- There is no fee for employees of state institutions.
- Application forms must be printed out, completed, and mailed in hard copy.
- Form #2275 provides instructions for filing a new application or amendment.
- Form #2277 outlines the physical security requirements for storage of controlled substances.
- A complete WI Controlled Substances SUA application will include
  1. Completed Form #2184
  2. Signed checklist Form #2836 (you must mail the initialed checklist back to DSPS)
  3. Detailed 1-page layman’s description of IACUC-approved study that places drug use in context (do not send the entire IACUC protocol)
  4. Copy of the IACUC approval letter, which can be sent directly to WI DSPS by the protocol managers in the RARC IACUC Office upon email request from PI on protocol
- **SUAs must be renewed annually.** No renewal notice is given by the WI DSPS but the SUA will expire if not renewed 8 – 12 weeks prior to the expiration date of the current SUA. The application procedure for SUA renewals is identical to that for initial applications.
- Your RARC veterinarian is available for consultation regarding drug types, dosages, routes of administration, formulations, commercial products, and other medical issues.
- Contact Sarah Johnson ([sjohnson@rarc.wisc.edu](mailto:sjohnson@rarc.wisc.edu)) or [help@rarc.wisc.edu](mailto:help@rarc.wisc.edu) for assistance with SUA and DEA applications, registration procedures, controlled substance management, or if you have waited for more than 8 weeks for a response to your SUA application.
Federal Registration

- Researchers can only apply for DEA registration once a WI SUA number has been issued.
- Researchers apply for DEA registration from the DEA Office of Diversion Control: [http://www.deadiversion.usdoj.gov/drugreg/index.html#regapps](http://www.deadiversion.usdoj.gov/drugreg/index.html#regapps)
- DEA applications are better submitted online, but the forms can also be printed and completed in hard copy. Do not submit both online and hard copies.
- Researchers need to complete DEA Form #225 “Manufacturer, Distributor, Researcher, Analytical Laboratory, Importer, Exporter”.
- State employees are usually exempt from the DEA registration fee. The certifying official for fee-exemption status is typically the Associate Dean for Research in the school or college.
- The Milwaukee DEA Office may send an additional informational questionnaire prior to issuing a DEA registration number. Contact RARC for help completing the supplemental application.
- DEA Registration for Research lasts 1 year. The DEA typically provides a reminder to renew. Use DEA Form #225a for renewal applications.

Storage & Security Requirements

As a DEA and SUA Registration holder, you are legally responsible for providing effective controls and procedures to prevent theft and diversion of controlled substances. Before obtaining any controlled substance, a secure storage area, that meets state and federal security requirements, must be set.

Both the State of WI and the Federal DEA have physical security requirements but the requirements set by the State of WI DSPS are more stringent. Compliance with WI DSPS ensures compliance with the DEA.

WI DSPS requires a wall-mounted or floor-bolted lockbox, housed in a room that is locked during non-use hours. Please, see the full list of requirements provided by the WI DSPS on Form #2277, “Physical Security Requirements”: [http://dsps.wi.gov/Default.aspx?Page=4629c414-43ce-4f3d-b1d3-7365d37e4a50](http://dsps.wi.gov/Default.aspx?Page=4629c414-43ce-4f3d-b1d3-7365d37e4a50)

An approved (small) double locking cabinet can be ordered through Health Care Logistics, 1-800-848-1633, or [www.healthcarelogistics.com](http://www.healthcarelogistics.com), item #3707-01: slim line narcotic cabinet for ~ $150.00. Contact UW Facilities Planning & Management (FP&M) or your building manager for mounting and associated costs.

*NOTE: Procedures differ for Practitioners (MDs, DVM, and others). For information about using controlled substances in research if you hold a Practitioner’s license, please contact: help@rarc.wisc.edu*