

Controlled Substances SOP 05: Decommissioning a Lockbox

1. Purpose

This procedure documents the decommissioning process when a research lab terminates their use of controlled substances in research. The process includes a checklist that should be completed and signed by the LCSC prior to completion.

2. Regulatory References

None

3. Training Requirements

All Controlled Substances SOP.

4. General Information

- A. Abbreviations:
 - 1) Central Controlled Substances Custodian (CCSC)
 - 2) Controlled Substance (CS)
 - 3) Controlled Substances Tracking System (CST)
 - 4) Environmental Health and Safety (EHS)
 - 5) Institute Point of Contact, Director of Research Compliance (IPOC)
 - 6) Laboratory Controlled Substances Custodian (LCSC)
 - 7) Office of Laboratory Animal Resources (OLAR)
 - 8) Principal Investigator (PI)
- B. Caltech has two DEA licenses and each license has its own CCSC, who is responsible for training personnel and managing CS inventory on their respective licenses.

5. Procedure

- A. Upon receiving notification that a lab wishes to terminate its use of controlled substances in research, the EHS or OLAR CCSC will request that the lab provide an email notification with the formal request for termination. When the email is received, the CCSC will make an electronic PDF of the email and place it in the lab's folder in the SharePoint CS Folder.
- B. The CCSC will organize a date and time to visit the lab. On the agreed upon time, the CCSC will go to the lab and take physical possession of the CS, UDTD forms, logbook, and CS binder. The CCSC will follow all procedures for the CS SOP 3 - Receipt of Controlled Substances for Disposal. The LCSC will sign the "Checkout Form" (Exhibit A in this SOP) to verify that they have turned over all CS units and dilutions, and that the CS binder and logbooks have been received.
- C. The CCSC will create an AIM workorder request to remove the lockboxes from the lab location by Carpentry Shop. The AIM workorder request will include the following:
 - 1) Location of the lockbox and keybox; and
 - 2) Request that the lockbox and keybox be returned.

- D. When the AIM workorder is scheduled, the CCSC will attend the lockbox and keybox removal. Once completed and the lockbox and keybox are returned to CCSC, the CCSC will verify that the lockbox number is the one originally issued to the lab.
 - 1) If the box has the correct assigned lockbox number, the CCSC will update the Lockbox Inventory Spreadsheet by Updating the "Date Returned" column.
 - 2) If the box does not have the correct assigned lockbox number, the CCSC will immediately report this to the IPOC.
- E. The CCSC will notify IPOC by email regarding the status of decommissioning boxes based on part (D) of this procedure. The CCSC will update the location in the CST and SharePoint files to indicate non-use.
- F. Files related to the decommissioned lockbox must be maintained for a period consistent with DEA regulation (currently 2 years).

6. Revocation of Authorization and Decommissioning

- A. Notice: The Division Office, the IACUC, or the IPOC will notify the CCSC if a PI's authorization is revoked. Such notification will prompt the CCSC to take action to secure any inventory of CS related to the revoked authorization.
- B. Access Restricted/Surrender of Controlled Substances:
 - 1) Once notified about a revocation, the CCSC will remove the PI and all authorized users from the list of Authorized Users.
 - 2) The CCSC will contact the LCSC for the lab to request confirmation that the lockbox is secured and prepared for the LCSC to remove the CS.
 - a. Contact the LCSC to arrange a mutually convenient time within 24 hours that the CS can be removed from the lab.
 - b. If the LCSC is uncooperative, proceed to notify the division operations officer to schedule a time to meet within 24 hours.
 - c. If the LCSC is still unwilling or unable to surrender the CS, the CCSC should contact the IPOC and they will proceed with the steps necessary to enable the LCSC to secure the CS.
 - 3) If the revocation is for an individual, the CCSC will contact the LCSC to ensure that the person no longer has access to the CS- this may require changing the location of the lockbox keys, returning keys or revoking keycard access to a lockbox.
 - 4) The CCSC will document the restriction of access and surrender of CS, as well as notify the IPOC when the CS is secure.
- C. Decommissioning: The Decommissioning process described in 6, above, will be followed.

CALTECH CONTROLLED SUBSTANCE DECOMMISSIONING CHECKLIST

LAB:	LOCATION:
LAD:	LUCATION:

LOCKBOX NUMBER:	LCSC NAME:	

1. RECEIPT OF CONTROLLED SUBSTANCES BY CCSC

A. Items of CS Present

Use separate page if more items are present than the boxes above allow.

The LCSC for this Research Lab listed above declares that all controlled substances and containers of diluted material listed on this form and its attachments have been relinquished to the CCSC.

Relinquished:	Received:
LCSC Signature	CCSC Signature

2. RECEIPT OF LOCKBOX AND KEYBOX

CCSC: Please check off the following to close out this decommissioning process:

- _____ AIM Worker Sent to Carpentry Shop. WO #______
- _____ RECEIVED LOCKBOX from Carpentry Shop.
- _____ LOCKBOX Number identified with Lockbox Inventory List and updated.
- _____ LOCKBOX placed back into Storage.
- _____ LOCKBOX NOT COMPLIANT. REPORT TO CCSC.

3. CS BINDER/LOGBOOKS

CCSC: Retrieve the CS Binder and Logbooks from the LCSC:

Relinquished:	Received:
LCSC Signature	CCSC Signature
	CCSC Signature