

Controlled Substances User SOP 03: Biennial Inventory

1. Purpose

This procedure describes the inventory process conducted every two years for the Controlled Substances lockboxes.

2. Regulatory References**3. General Information****A. Abbreviations:**

- 1) Authorized Person (AP)
- 2) Central Controlled Substances Custodian (CCSC)
- 3) Controlled Substance (CS)
- 4) Controlled Substances Tracking System (CSTS)
- 5) Environmental Health and Safety (EHS)
- 6) Institute Point of Contact, Chief Research Policy Officer (IPOC)
- 7) Laboratory Controlled Substances Custodian (LCSC)
- 8) Office of Laboratory Animal Resources (OLAR)
- 9) Office of Research Compliance (ORC)
- 10) Principal Investigator (PI)
- 11) Uniform Distribution, Transfer, and Disposal Form (UDTD)

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.

4. Training Requirements

- A. PI Training (CS User SOP 1)
- B. LCSC Training (CS User SOP 1)

5. Procedure

EHS conducts inventories of its licensed CS holders in March of every odd-numbered year. OLAR conducts inventories of its licensed CS holders in September of every odd-numbered year.

Timeline:

- 1) Two weeks prior to the inventory: ORC will email PIs and LCSCs to provide information on the upcoming biennial inspection and give timeframe of visit.
- 2) End of day prior to the inventory:
 - a. CCSC will email a reminder of inspection to labs. This email will include:
 - Instructions to input changes to inventory in the CSTS and email orc@caltech.edu on day of inventory
 - A link to the CS inspection form ([Attachment E](#))

- A copy of ORC's email with instructions

3) Day of Inventory:

- a. Inventory: At the start of the inspection day, the inventory will be accessible in the Controlled Substances Tracking System (CSTS) for the LCSC. The LCSC must enter the inventory in the CSTS with the amount of controlled substances in possession. This process should include comparing (by eye is acceptable) what is actually in the bottle with the corresponding entries in the labs' logbooks. Initial and date the logbook entry that corresponds to the amount of controlled substance reported on the form. Please also note any apparent discrepancies in the logbooks.
- b. After completing the inventory, immediately email to the orc@caltech.edu to confirm that the inventory is complete, no later than the specified date and time in the emailed instructions.
- c. Complete the CS inspection form ([Attachment E](#)) and have this form ready for the CS inventory team. The CS inventory team will confirm the form is accurate and complete.
- d. The CS inventory team will meet the lab member(s) at the appointed time and location to perform the CS inventory. The LCSC and/or lab member(s) must be readily available. The CS inventory team will confirm that the records are complete and properly documented. The LSCS will send the signed CS Inspection Form to the CCSC via email and place a printed copy in the CS binder.