Veterinarians and the DEA

American Veterinary Medical Association

July 13, 2015
I have no financial relationships to disclose and I will not discuss off-label use and/or investigational drug use in my presentation.
For a controlled substance prescription to be effective, it must be, “issued for a legitimate medical purpose by an individual practitioner acting in the usual course of professional practice.”

- A) True
- B) False
Which of the following statements is false concerning regulations promulgated under the Secure and Responsible Drug Disposal Act of 2010:

A) Regulations do not limit the ways ultimate users may dispose of pharmaceutical controlled substances – they expand them.

B) Any method of pharmaceutical disposal that was valid prior to these regulations continues to be valid.

C) Any DEA registrant may participate as an authorized collector of pharmaceutical controlled substances.

D) DEA may not require any person to establish or operate a disposal program.
What combination of drugs is referred to as the “trinity”? 

A) Hydrocodone, alprazolam, and carisoprodol 

B) Promethazine with codeine, methylphenidate and carisoprodol 

C) Hydromorphone, carisoprodol and buprenorphine 

D) Methadone, diazepam and tramadol
More Americans abuse prescription drugs than the number of:

Cocaine, Hallucinogen, Heroin, and Inhalant abusers

COMBINED!!!
Drug Overdose Mortality Rates per 100,000 People 1999

Drug Overdose Mortality Rates per 100,000 People 2010

What People Are Abusing
Hydrocodone

Commonly Abused Controlled Substances

Carisoprodol

C-IV as of 1/11/2012

OxyContin 80mg

Oxymorphone

Oxycodone 30 mg

Alprazolam
Top 5 Prescription Drugs Sold in the US 2006-2011

(By Number of Prescriptions Sold)

Source: IMS Health

U.S. Drug Enforcement Administration
Office of Diversion Control
Hydrocodone

- Hydrocodone / Acetaminophen (toxicity)

- Similarities:
  - Structurally related to codeine
  - Equal to morphine in producing opiate-like effects

- Brand Names: Vicodin®, Lortab®, Lorcet®

- Currently, combination products are Schedule III

- October 6, 2014 moved to SCHEDULE II

- “Cocktail” or “Trinity”
  - Hydrocodone
  - Soma® / carisoprodol
  - Alprazolam / Xanax®

- Street prices: $2 to $10+ per tablet depending on strength & region
67 countries reported an estimated need requirement for hydrocodone to the International Narcotics Control Board.

- 20 countries reported an estimated need of 1 kilogram or greater.
- 4 countries reported an estimated need between 500 grams and 999 grams.
- 10 countries reported an estimated need between 100 grams and 499 grams.
- 6 countries reported a need between 25 grams and 99 grams.
- 27 countries reported a need of less than 25 grams.

**Worldwide Hydrocodone Use**

- **Of the 20 Countries** that reported an estimated needs requirement for hydrocodone at one kilogram or more

- **8 countries** reported an estimated need of 1 kilogram to 5 kilograms

- **4 countries** reported an estimated need over 5 kilograms to 10 kilograms

- **8 countries** reported an estimated need over 10 kilograms

Top 10 List

- 10 Guatemala    10 kilograms
- 09 India        10 kilograms
- 08 Vietnam      20 kilograms
- 07 China        20 kilograms
- 06 Denmark      25.5 kilograms
- 05 Columbia     30 kilograms
- 04 Syrian Republic 50 kilograms
- 03 Canada       115.5 kilograms
- 02 United Kingdom 200 kilograms
- 01 United States 79,700 kilograms 99.3%

The Trinity

Hydrocodone

Opiate

Carisoprodol

Muscle Relaxant

C-IV as of 1/11/2012

Alprazolam

Benzodiazepine

U.S. Drug Enforcement Administration
Office of Diversion Control
OxyContin controlled release formulation of Schedule II oxycodone

– The controlled release method of delivery allowed for a longer duration of drug action so it contained much larger doses of oxycodone

– Abusers easily compromised the controlled release formulation by crushing the tablets for a powerful morphine-like high

– 10, 15, 20, 30, 40, 60, 80mg available

Effects:

– Similar to morphine in effects and potential for abuse/dependence

– Sold in “Cocktails” or the “Holy Trinity” (Oxycodone, Soma® / carisoprodol, Alprazolam / Xanax®)

Street price: Approx. $80 per 80mg tablet

NOTE: New formulation introduced into the marketplace in 2010 that is more difficult to circumvent for insufflation (snorting) or injection. Does nothing to prevent oral abuse.
Prescription Opiates vs. Heroin
The Circle of Addiction & The Next Generation

Hydrocodone
Lorcet®
$5-$7/tab

Oxycodone Combinations
Percocet®
$7-$10/tab

OxyContin®
$80/tab

Roxicodone®
Oxycodone IR
15mg, 30mg
$30-$40/tab

Heroin
$15/bag
Heroin: No Longer Confined to Urban Areas
The CSA: Checks and Balances
Mission

The mission of the Office of Diversion Control is to prevent, detect, and investigate the diversion of pharmaceutical controlled substances and listed chemicals from legitimate channels of distribution while ensuring an adequate and uninterrupted supply of controlled substances to meet legitimate medical, commercial, and scientific needs.
Cutting off the Source of Supply
1,552,539 (09/05/2014)

- Practitioners: 1,195,941
- Retail Pharmacies: 70,289
- Hospital/Clinics: 16,120
Closed System of Distribution

Cyclic Investigations

Record Keeping Requirements

Security Requirements

Established Schedules

Registration

Established Quotas

ARCOS

U.S. Drug Enforcement Administration
Office of Diversion Control
The DEA is responsible for:

– the **oversight** of the system

– the **integrity** of the system

– the **protection** of the public health and safety
Distributor Initiative

Educate and inform distributors/manufacturers of their due diligence responsibilities under the CSA by discussing their Suspicious Order Monitoring System, reviewing their ARCOS data for sales and purchases of Schedules II and III controlled substances, and discussing national trends involving the abuse of prescription controlled substances

August 1, 2005 – May 15, 2015: Briefings to 84 firms with 279 registrations

U.S. Drug Enforcement Administration
Office of Diversion Control
Pharmacy Diversion Awareness Conference

This conference is designed to educate pharmacists, pharmacy technicians, and pharmacy loss prevention personnel on ways to address and respond to potential diversion activity.
Completed PDACs

FY-2011
1-Cincinnati, OH 9/17-18/11  75
FY-2011 Total Attendance  75
FY-2012
2-WPB, FL 3/17-18/12  1,192
3-Atlanta, GA 6/2-3/12  328
4-Houston, TX 9/8-9/12  518
5-Long Island, NY 9/15-16/12  391
FY-2012 Total Attendance 2,429
FY-2013
6-Indianapolis, IN 12/8-9/12  137
7-Albuquerque, NM 3/2-3/13  284
8-Detroit, MI 5/4-5/13  643
9-Chicago, IL 6/22-23/13  321
10-Portland, OR 7/13-14/13  242
11-Baton Rouge, LA 8/3-4/13  259
12A-San Diego, CA 8/16-17/13  353
12B-San Jose, CA 8/18-19/13  434
FY-2013 Total Attendance 2,948
FY-2014
14-Louisville, KY 11/16-17/13  149
15-Charlotte, NC 2/8-9/14  513
16-Knoxville, TN 3/22-23/14  246
17-St. Louis, MO 4/5-6/14  224
18-Philadelphia, PA 7/12-13/14  276
19-Denver, CO 8/2-3/14  174
20-SLC, UT 8/23-24/14  355
21-Phoenix, AZ 9/13-14/14  259
FY-2014 Total Attendance 2,196
FY-2015
22-Las Vegas, NV 2/7-8/15  193
23-Birmingham, AL 3/28-29/15  296
24-Norfolk, VA 5/30-31/15  410
Total Attendance To Date 8,547

Proposed FY-2015 PDACs
25-Oklahoma City, OK June 27-28, 2015
26-Milwaukee, WI July 25-26, 2015
27-Seattle, WA August 8-9, 2015
28-Portland, ME September 12-13, 2015

Postponed FY-2015 PDAC
Rapid City, SD
Scheduled Investigations

• Increase in the number of DEA registrants that are required to be investigated to ensure compliance with the Controlled Substances Act and its implementing regulations

• Increase in the frequency of the regulatory investigations

• Verification investigations of customers and suppliers
21 CFR § 1301.71(a)

“All applicants and registrants shall provide effective controls and procedures to guard against theft and diversion of controlled substances.”
21 CFR § 1301.71(a)

In order to determine whether a registrant has provided effective controls against diversion, the Administrator shall use the security requirements set forth in §§ 1301.72-1301.76 as standards for the physical security controls and operating procedures necessary to prevent diversion.
Suspicious Orders

21 CFR § 1301.74(b)

Non-practitioners of controlled substances

“The registrant shall design and operate a system to disclose to the registrant suspicious orders of controlled substances...Suspicious orders include orders of unusual size, orders deviating substantially from a normal pattern, and orders of unusual frequency.”
Prescriptions

21 CFR § 1306.04(a)

A prescription for a controlled substance to be effective must be issued for a **legitimate medical purpose** by an individual practitioner **acting** in the **usual course of his professional practice**.

*United States v Moore* 423 US 122 (1975)
21 CFR § 1306.04(a)

The responsibility for the proper prescribing and dispensing of controlled substances is upon the prescribing practitioner, but a corresponding responsibility rests with the pharmacist who fills the prescription.
A pharmacist, by law, has a corresponding responsibility to **ensure** that prescriptions are legitimate.

Just because a prescription is presented by a patient or demanded to be filled for a patient by a doctor’s office, a pharmacist is **not** obligated to fill the prescription!!!
Administrative
Immediate Suspension Order (ISO)
Memorandum of Agreement (MOA)
Order to Show Cause (OTSC)

Civil
Fines

Criminal
Arrests
Criminal fines
Secure and Responsible Drug Disposal Act of 2010
Ultimate user means as “a person who has lawfully obtained, and who possesses, a controlled substance for his own use or for the use of a member of his household or for an animal owned by him or a member of his household.”

21 USC § 802(27)
The Problem: Easy Access
Disposal in Trash (ONDCP method); or

Flushing (FDA opioids and select CSs)

National Take-back Event

Transfer to Law Enforcement (Police Station Receptacles or local Take-back events)

DEA
Secure and Responsible Drug Disposal Act of 2010

- CSA amended to provides ultimate users and LTCF with additional methods to dispose of unused, unwanted or expired controlled substance medication in a secure, safe and responsible manner

- Amendment authorizes DEA to inspect all collection facilities

21 USC §§ 822(f) and (g)
Secure and Responsible Drug Disposal Act of 2010

• Regulations did not limit the ways that ultimate users may dispose of pharmaceutical controlled substances—they expanded them.

• Any method of pharmaceutical disposal that was valid for ultimate users prior to these regulations continues to be valid.
Participation is voluntary.

DEA may not require any person to establish or operate a disposal program.

21 USC §§ 822(g)(2)
Secure and Responsible Drug Disposal Act of 2010

- Disposal rule eliminated existing 21 CFR 1307.12 and 1307.21

- New part 1317 contains the requirements on:
  - disposal procedures;
  - collection of pharmaceutical controlled substances from ultimate users;
  - return and recall; and
  - destruction of controlled substances
Law enforcement continues to have autonomy with respect to how they collect controlled substances from ultimate users, including:

- maintaining collection receptacles
- conducting mail-back programs
- conducting take-back events

21 CFR § 1317.35
• Law Enforcement may continue to conduct take-back events.

• Any person may partner with Law Enforcement.

• Law Enforcement shall maintain control and custody of collected substances until secure transfer, storage, or destruction has occurred.

• Authorized collection receptacles and inner liners “should” be used.

21 CFR §§ 1317.35 and 1317.65
**Collection**

Collection means to receive a controlled substance for the purpose of destruction from an:

- Ultimate user,
- Person lawfully entitled to dispose of an ultimate user decedent’s property, or
- LTCF on behalf of an ultimate user who resides or has resided at the facility.

*21 USC §§ 822(g)(3) and (4)*

*21 CFR § 1300.01(b)*
The following persons are authorized to collect from ultimate user and other non-registrants for destruction:

- Any DEA registrant authorized pursuant to § 1317.40
- Federal, State, tribal, or local law enforcement when in the course of official duties and pursuant to § 1317.35

Registrants authorized to collect:
- Manufacturers
- Distributors
- Reverse Distributors
- Narcotic Treatment Programs
- Hospitals/clinics with an on-site pharmacy
- Retail Pharmacies

Authorized collectors, as registrants, are readily familiar with the security procedures and other requirements to handle controlled substances.
Registrant Disposal
Practitioner & Non-Practitioner may dispose of inventory:

• Prompt on-site destruction
• Prompt delivery to reverse distributor by common or contract carrier or reverse distributor pick-up
• Return and recall: Prompt delivery by common or contract carrier or pick-up at the registered location

**Practitioner** may also request assistance from the SAC

**Non-practitioner** may also transport by its own means

21 CFR § 1317.05(a) and (b)
Requirements for Destruction of Controlled Substances
Destruction of Controlled Substances

- All controlled substances destroyed by a registrant or caused to be destroyed by a registrant shall be destroyed in compliance with applicable Federal, State, tribal, and local laws and regulations and shall be rendered non-retrievable.

21 CFR § 1317.90
Non-retrievable means the condition or state to which a controlled substance shall be rendered following a process that permanently alters the substance’s physical or chemical condition or state through irreversible means, and thereby renders the controlled substance unavailable and unusable for all practical purposes.

21 CFR § 1300.05
Destruction of Controlled Substances

• Destruction shall be in accordance with the following requirements:
  • Transfer to registrant or person authorized to accept for destruction
  • Transport to a registered location
  • Transport to a non-registered location for destruction
  • On-site destruction

21 CFR § 1317.95
Destruction of Controlled Substances

- Transfer and transport for destruction
- Transportation directly to registered location or destruction location
- 2 employees accompany the controlled substances to location
- 2 employees load & unload or observe load & unload until transfer is complete

21 CFR § 1317.95(b) and (c)
2 employees of the registrant shall handle or observe the handling of any controlled substance until it is rendered non-retrievable, and

2 employees of the registrant shall personally witness the destruction of the controlled substance until it is rendered non-retrievable.

21 CFR § 1317.95(c) and (d)
Form 41 shall be used to record the destruction of all controlled substances, including controlled substances acquired from collectors.

- The Form 41 shall include the names and signatures of the two employees who witnessed the destruction.

- Exceptions for DEA Form 41:
  - Destruction of a controlled substance dispensed by a practitioner for immediate administration at the practitioner’s registered location, when the substance is not fully exhausted (i.e. wastage) shall be properly recorded in accordance with § 1304.22(c), and such record need not be maintained on a Form 41.
  - Transfers by registrant to a reverse distributor must be recorded in accordance with § 1304.22(c), and such record need not be maintained on a Form 41.

21 CFR § 1304.21(e)
### A. Registrant Information

<table>
<thead>
<tr>
<th>Registered Name</th>
<th>DEA Registration Number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Registered Address</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>City</th>
<th>State</th>
<th>Zip Code</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Telephone Number</th>
<th>Contact Name</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### B. Item Destroyed

#### 1. Inventory

<table>
<thead>
<tr>
<th>National Drug Code or DEA Controlled Substances Code</th>
<th>Batch Number</th>
<th>Name of Substance</th>
<th>Strength</th>
<th>Form</th>
<th>Pkg. Qty</th>
<th>Number of Full Pkgs.</th>
<th>Partial Pkg. Count</th>
<th>Total Destroyed</th>
</tr>
</thead>
<tbody>
<tr>
<td>16590-598-80</td>
<td>N/A</td>
<td>Kadian</td>
<td>60mg</td>
<td>Capsules</td>
<td>60</td>
<td>2</td>
<td>0</td>
<td>120 Capsules</td>
</tr>
<tr>
<td>0555-0767-02</td>
<td>N/A</td>
<td>Adderall</td>
<td>5mg</td>
<td>Tablet</td>
<td>100</td>
<td>0</td>
<td>83</td>
<td>83 Tablets</td>
</tr>
<tr>
<td>9050</td>
<td>B02120312</td>
<td>Codeine</td>
<td>N/A</td>
<td>Bulk</td>
<td>1.25 kg</td>
<td>N/A</td>
<td>N/A</td>
<td>1.25 kg</td>
</tr>
</tbody>
</table>

1.  
2.  
3.  
4.  

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U.S. Drug Enforcement Administration  
Office of Diversion Control
## 2. Collected Substances

<table>
<thead>
<tr>
<th>Returned Mail-Back Package</th>
<th>Sealed Inner Liner</th>
<th>Unique Identification Number</th>
<th>Size of Sealed Inner Liner</th>
<th>Quantity of Packages(s)/Liner(s) Destroyed</th>
</tr>
</thead>
<tbody>
<tr>
<td>X</td>
<td></td>
<td>MBP1106, MBP1108, MBP1110, MBP112</td>
<td>N/A</td>
<td>5</td>
</tr>
<tr>
<td>X</td>
<td></td>
<td>CRL1007 - CRL1027</td>
<td>15 gallon</td>
<td>21</td>
</tr>
<tr>
<td>X</td>
<td></td>
<td>CRL1201</td>
<td>5 gallon</td>
<td>1</td>
</tr>
</tbody>
</table>

Form DEA-41

See instructions on reverse (page 2) of form.
C. METHOD OF DESTRUCTION

<table>
<thead>
<tr>
<th>Date of Destruction</th>
<th>Method of Destruction</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Location or Business Name:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Address:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>City:</th>
<th>State:</th>
<th>Zip Code:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

D. WITNESSES

I declare under penalty of perjury, pursuant to 18 U.S.C. 1001, that I personally witnessed the destruction of the above-described controlled substances to a non-retrievable state and that all of the above is true and correct.

<table>
<thead>
<tr>
<th>Printed name of first authorized employee witness:</th>
<th>Signature of first witness:</th>
<th>Date:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Printed name of second authorized employee witness:</th>
<th>Signature of second witness:</th>
<th>Date:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

E. INSTRUCTIONS

1. Section A. REGISTRANT INFORMATION: The registrant destroying the controlled substance(s) shall provide their DEA registration number and the name and address indicated on their valid DEA registration, in addition to a current telephone number and a contact name, if different from the name on the valid DEA registration.

2. Section B. (1) Inventory: This part shall be used by registrants destroying lawfully possessed controlled substances, other than those described in Section B(2). In each row, indicate the National Drug Code (NDC) for the controlled substance destroyed, or if the substance has no NDC, indicate the DEA Controlled Substances Code Number for the substance; if the substance destroyed is in bulk form, indicate the batch number, if available. In each row, indicate the name, strength, and form of the controlled substance destroyed, and the number of capsules, tablets, etc., that are in a full package (pkg. qty.). If destroying the full quantity of the controlled substance, indicate the number of packages destroyed (number of full pkgs.). If destroying a partial package, indicate the partial count of the capsules, tablets, etc. destroyed (partial pkg. count). If destroying a controlled substance in bulk form, indicate that the substance is in bulk form (form) and the weight of the substance destroyed (pkg. qty.). In each row, indicate the total number of each controlled substance destroyed (total destroyed).
bulk form, indicate the batch number, if available. In each row, indicate the name, strength, and form of the controlled substance destroyed, and the number of capsules, tablets, etc., that are in a full package (pkg. qty.). If destroying the full quantity of the controlled substance, indicate the number of packages destroyed (number of full pkgs.). If destroying a partial package, indicate the partial count of the capsules, tablets, etc. destroyed (partial pkg. count). If destroying a controlled substance in bulk form, indicate that the substance is in bulk form (form) and the weight of the substance destroyed (pkg. qty.). In each row, indicate the total number of each controlled substance destroyed (total destroyed).

3. **Section B.** (2) Collected Substances: This part shall be used by registrants destroying controlled substances obtained through an authorized collection activity in accordance with 21 U.S.C. 822(g). In each row, indicate whether registrant is destroying a mail-back package or an inner liner. If destroying a mail-back package, enter each unique identification number separated by a comma and/or as a list in a sequential range and total quantity of packages being destroyed. If destroying an inner liner, enter each unique identification number separated by a comma and/or as a list in a sequential range based on the size of the liners destroyed and the total quantity of inner liners being destroyed. In the case of mail-back packages or inner liners received from a law enforcement agency which do not have a unique identification number or clearly marked size, include the name of the law enforcement agency and, if known, the size of the inner liner or package. DO NOT OPEN ANY MAIL-BACK PACKAGE OR INNER LINER; AN INVENTORY OF THE CONTENTS OF THE PACKAGES OR LINERS IS PROHIBITED BY LAW AND IS NOT REQUIRED BY THIS FORM.

4. If additional space is needed for items destroyed in Section B, attach to this form additional page(s) containing the requested information for each controlled substance destroyed.

5. **Section C. METHOD OF DESTRUCTION:** Provide the date, location, and method of destruction. The method of destruction must render the controlled substance to a state of non-retrievable and meet all applicable destruction requirements.

6. **Section D. WITNESSES:** Two authorized employees must declare by signature, under penalty of perjury, that such employees personally witnessed the destruction of the controlled substances listed in Section B in the manner described in Section C.

7. You are not required to submit this form to DEA, unless requested to do so. This form must be kept as a record of destruction and be available by the registrant for at least two years in accordance with 21 U.S.C. 827.

**Paperwork Reduction Act Statement:** The information collected on this form is necessary for DEA registrants to record controlled substances destroyed in accordance with the Controlled Substances Act (CSA). The records that DEA registrants maintain in accordance with the CSA must be kept and be available, for at least two years, for inspection and copying by officers or employees of the United States authorized by the Attorney General. 21 U.S.C. 827. DEA estimates that it will take approximately 30 minutes to complete this form, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The completion of this form by DEA registrants that destroy controlled substances is mandatory in accordance with 21 U.S.C. 827. Please note that an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Comments regarding this information collection, including suggestions for reducing the burden estimate, should be directed to the Drug Enforcement Administration, DEA Federal Register Representative/ODL, 8701 Morrissette Drive, Springfield, Virginia 22152.
INSTRUCTIONS
Registrant Record of Controlled Substances Destroyed - DEA Form 41

1. Section A. Registrant Information:
The registrant destroying the controlled substance(s) shall provide their DEA registration number and the name and address indicated on their valid DEA registration, in addition to a current telephone number and a contact name, if different from the name on the valid DEA registration.

2. Section B. (1) Inventory:
This part shall be used by registrants destroying lawfully possessed controlled substances, other than those described in Section B.(2). In each row, indicate the National Drug Code (NDC) for the controlled substance destroyed, or if the substance has no NDC, indicate the DEA Controlled Substances Code Number for the substance; if the substance destroyed is in bulk form, indicate the batch number, if available. In each row, indicate the name, strength, and form of the controlled substance destroyed, and the number of capsules, tablets, etc., that are in a full package (pkg. qty.). If destroying the full quantity of the controlled substance, indicate the number of packages destroyed (number of full pkgs.). If destroying a partial package, indicate the partial count of the capsules, tablets, etc. destroyed (partial pkg. count). If destroying a controlled substance in bulk form, indicate that the substance is in bulk form (form) and the weight of the substance destroyed (pkg. qty.). In each row, indicate the total number of each controlled substance destroyed (total destroyed).

3. Section B. (2) Collected Substances:
This part shall be used by registrants destroying controlled substances obtained through an authorized collection activity in accordance with 21 U.S.C. 822(g). In each row, indicate whether registrant is destroying a mail-back package or an inner liner. If destroying a mail-back package, enter the unique identification number separated by a comma and/or as a list in a sequential range and total quantity of packages being destroyed. If destroying an inner liner, enter each unique identification number separated by a comma and/or as a list in a sequential range based on the size of the liners destroyed and the total quantity of inner liners being destroyed. In the case of mail-back packages or inner liners received from a law enforcement agency which do not have a unique identification number or clearly marked size, include the name of the law enforcement agency and, if known, the size of the inner liner or package. DO NOT OPEN ANY MAIL-BACK PACKAGE OR INNER LINER; AN INVENTORY OF THE CONTENTS OF THE PACKAGES OR LINERS IS PROHIBITED BY LAW AND IS NOT REQUIRED BY THIS FORM.

4. If additional space is needed for items destroyed in Section B, attach to this form additional page(s) containing the requested information for each controlled substance destroyed.

5. Section C. Method of Destruction:
Provide the date, location, and method of destruction. The method of destruction must render the controlled substance to a state of non-retrievable and meet all applicable destruction requirements.

6. Section D. Witnesses:
Two authorized employees must declare by signature, under penalty of perjury, that such employees personally witnessed the destruction of the controlled substances listed in Section B in the manner described in Section C.

7. You are not required to submit this form to DEA, unless requested to do so. This form must be kept as a record of destruction and be available by the registrant for at least two years in accordance with 21 U.S.C. 827.

Paperwork Reduction Act Statement:
The information collected on this form is necessary for DEA registrants to record controlled substances destroyed in accordance with the Controlled Substances Act (CSA). The records that DEA registrants maintain in accordance with the CSA must be kept and be available, for at least two years, for inspection and copying by persons authorized to obtain the records by the Attorney General. 21 U.S.C. 827. DEA estimates that it will take approximately 30 minutes to complete this form, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The completion of this form by DEA registrants that destroy controlled substances is mandatory in accordance with 21 U.S.C. 827. Please note that an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Comments regarding this information collection, including suggestions for reducing the burden estimate.
DEA Form 106
**REPORT OF THEFT OR LOSS OF CONTROLLED SUBSTANCES**

Federal Regulations require registrants to submit a detailed report of any theft or loss of Controlled Substances to the Drug Enforcement Administration. Complete page 1, and either page 2 or 3. Make two additional copies of the completed form. Forward the original and duplicate copies to the nearest DEA Office. Retain the triplicate copy for your records. Some states may also require a copy of this report.

<table>
<thead>
<tr>
<th>1. Name and Address of Registrant (Include ZIP Code)</th>
<th>2. Phone No. (Include Area Code)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>3. DEA Registration Number</th>
<th>4. Date of Theft or Loss</th>
<th>5. Principal Business of Registrant (Check one)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>1. Pharmacy</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2. Practitioner</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3. Manufacturer</td>
</tr>
<tr>
<td></td>
<td></td>
<td>4. Hospital/Clinic</td>
</tr>
<tr>
<td></td>
<td></td>
<td>5. Distributor</td>
</tr>
<tr>
<td></td>
<td></td>
<td>6. Methadone Program</td>
</tr>
<tr>
<td></td>
<td></td>
<td>7. Other (Specify)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>6. County in which Registrant is Located</th>
<th>7. Was Theft reported to Police?</th>
<th>8. Name and Telephone Number of Police Department (Include Area Code)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>9. Number of Thefts or Losses Registrant has Experienced in the Past 24 Months</th>
<th>10. Type of Theft or Loss (Check one and complete items below as appropriate)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1. Night Break-in</td>
</tr>
<tr>
<td></td>
<td>2. Armed Robbery</td>
</tr>
<tr>
<td></td>
<td>3. Employee Pilferage</td>
</tr>
<tr>
<td></td>
<td>4. Customer Theft</td>
</tr>
<tr>
<td></td>
<td>5. Other (Explain)</td>
</tr>
<tr>
<td></td>
<td>6. Lost in Transit (Complete Item 14)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>11. If Armed Robbery, was Anyone:</th>
<th>12. Purchase value to Registrant of Controlled Substances taken?</th>
<th>13. Were any pharmaceuticals or merchandise taken?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Killed?</td>
<td>Yes (How Many)</td>
<td>No</td>
</tr>
<tr>
<td>Injured?</td>
<td>Yes (How Many)</td>
<td>No</td>
</tr>
</tbody>
</table>

$$_$$

<table>
<thead>
<tr>
<th>14. IF LOST IN TRANSIT, COMPLETE THE FOLLOWING:</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Name of Common Carrier</td>
</tr>
<tr>
<td>---------------------------</td>
</tr>
</tbody>
</table>
14. IF LOST IN TRANSIT, COMPLETE THE FOLLOWING:

<table>
<thead>
<tr>
<th>A. Name of Common Carrier</th>
<th>B. Name of Consignee</th>
<th>C. Consignee's DEA Registration Number</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>D. Was the carton received by the customer?</th>
<th>E. If received, did it appear to be tampered with?</th>
<th>F. Have you experienced losses in transit from this same carrier in the past?</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Yes</td>
<td>☐ Yes</td>
<td>☐ No</td>
</tr>
<tr>
<td>☐ No</td>
<td>☐ No (How Many)</td>
<td>☐ Yes</td>
</tr>
</tbody>
</table>

15. What identifying marks, symbols, or price codes were on the labels of these containers that would assist in identifying the products?

16. If official Controlled Substance Order Forms (DEA-222) were stolen, give numbers.

17. What security measures have been taken to prevent future thefts or losses?

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**PRIVACY ACT INFORMATION**

AUTHORITY: Section 301 of the Controlled Substances Act of 1970 (PL 91-513).
PURPOSE: Report theft or loss of Controlled Substances.

ROUTINE USES: The Controlled Substances Act authorizes the production of special reports required for statistical and analytical purposes. Disclosures of information from this system are made to the following categories of users for the purposes stated:

- Other Federal law enforcement and regulatory agencies for law enforcement and regulatory purposes
- State and local law enforcement and regulatory agencies for law enforcement and regulatory purposes

EFFECT: Failure to report theft or loss of controlled substances may result in penalties under Section 402 and 403 of the Controlled Substances Act.

In accordance with the Paperwork Reduction Act of 1995, no person is required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this collection of information is 1117-0001. Public reporting burden for this collection of information is estimated to average 20 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

**Freedom of Information:** Please prominently identify any confidential business information per 28 CFR 16.8(c) and Exemption 4 of the Freedom of Information Act (FOIA). In the event DEA receives a FOIA request to obtain such information, DEA will give written notice to the registrant to obtain such information. DEA will give written notice to the registrant to allow an opportunity to object prior to the release of information.
<table>
<thead>
<tr>
<th>Trade Name of Substance or Preparation</th>
<th>NDC Number</th>
<th>Name of Controlled Substance in Preparation</th>
<th>Dosage Strength</th>
<th>Dosage Form</th>
<th>Total Quantity Lost or Stolen</th>
</tr>
</thead>
<tbody>
<tr>
<td>Desoxyn</td>
<td>00074-3377-01</td>
<td>Methamphetamine Hydrochloride</td>
<td>5 mg</td>
<td>Tablets</td>
<td>360</td>
</tr>
<tr>
<td>Demerol</td>
<td>00408-0181-03</td>
<td>Meperidine Hydrochloride</td>
<td>50 mg/ml</td>
<td>Vial</td>
<td>150 ml</td>
</tr>
<tr>
<td>Robitussin A-C</td>
<td>00061-9674-29</td>
<td>Codeine Phosphate</td>
<td>2 mg/cc</td>
<td>Liquid</td>
<td>5676 ml</td>
</tr>
</tbody>
</table>

**Remarks:** (Optional)

I certify that the foregoing information is correct to the best of my knowledge and belief.

Sign and Print Name

Title

Date
### LIST OF MAIL-BACK PACKAGES OR INNER LINERS LOST OR STOLEN

<table>
<thead>
<tr>
<th>Mail-Back Package</th>
<th>Inner Liner</th>
<th>Unique Identification Number(s)</th>
<th>Size of Inner Liner</th>
<th>Total Quantity Lost or Stolen</th>
</tr>
</thead>
<tbody>
<tr>
<td>X</td>
<td></td>
<td>MBP1106, MBP1108 - MBP1110, MBP1112</td>
<td>N/A</td>
<td>5</td>
</tr>
<tr>
<td>X</td>
<td></td>
<td>CRL1007 - CRL1027</td>
<td>15 GALLON</td>
<td>21</td>
</tr>
<tr>
<td>X</td>
<td></td>
<td>CRL1201</td>
<td>5 GALLON</td>
<td>1</td>
</tr>
</tbody>
</table>

#### Examples

1. 
2. 
3. 
4. 
5. 
6. 
7. 
8. 

#### Remarks: (Optional)

Express in Total Quantities

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If you are an authorized Retail Pharmacy or Hospital/Clinic with an onsite Pharmacy and reporting a theft or loss at a Long-Term Care Facility (LTCF), provide name and address of LTCF.

Name of LTCF: ____________________________

Address, City, State, Zip Code: ____________________________

I certify that the foregoing information is correct to the best of my knowledge and belief.

Sign and Print Name: ____________________________

Title: ____________________________

Date: ____________________________
DEA Registration Information for Medical Practitioners

TOP STORY

DEA Issues Nationwide Alert on Fentanyl as Threat to Health and Public Safety

MAR 18 (WASHINGTON)

The United States Drug Enforcement Administration (DEA) today issued a nationwide alert about the dangers of fentanyl and fentanyl analogues/compounds. Fentanyl is commonly laced in heroin, causing significant problems across the country, particularly as heroin abuse has increased. This alert was issued through the multi-agency El Paso Intelligence Center (EPIC) to all U.S. law enforcement.

TOPICS OF INTEREST

- 2014 National Drug Threat Assessment Summary
- Final Order: Temporary Placement of 10 Synthetic Cathinones Into Schedule I
- Temporary Placement of Four Synthetic Cannabinoids Into Schedule I

RESOURCE CENTER

- Controlled Substances Act
- DEA Museum and Visitors Center
- Doing Business with DEA
- Drug Disposal
- Employee Assistance Program
- Extortion Scam Alert
- For Victims of Crime
- How do I...?
- National Clandestine Laboratory Register
- Registration for Practitioners
- Statistics & Facts

STAY CONNECTED
DEA has 221 Domestic Offices in 21 Divisions throughout the U.S., and 86 Foreign Offices in 67 countries. Content on this website is organized by Division. Please click on the map below for information about each Division. For general DEA information, please go to Contact Us.

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Caribbean Division
Dallas Division
Denver Division
Detroit Division
El Paso Division
Headquarters
Houston Division
Los Angeles Division
Miami Division
New England Division
New Jersey Division
New Orleans Division
New York Division
Philadelphia Division
Phoenix Division
San Diego Division
San Francisco Division
Seattle Division
St. Louis Division
Washington, DC Division

RESOURCE CENTER
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DEA Web-Based Resources

Office of Diversion Control
www.deadiversion.usdoj.gov
DEA Web-Based Resources

www.DEA.gov
DEA Web-Based Resources

www.JustThinkTwice.com
Thank You