Veterinarians and the DEA

American Veterinary Medical Association

July 13, 2015

The United States Department of Justice
Drug Enforcement Administration

Ruth A. Carter, Chief
Liaison and Policy Section
Office of Diversion Control

Disclosure Statement

I have no financial relationships to disclose

and

I will not discuss off-label use and/or investigational drug use in my presentation

Questions to Discuss

True or False…

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

Questions to Discuss

- 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.

Questions to Discuss

- 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

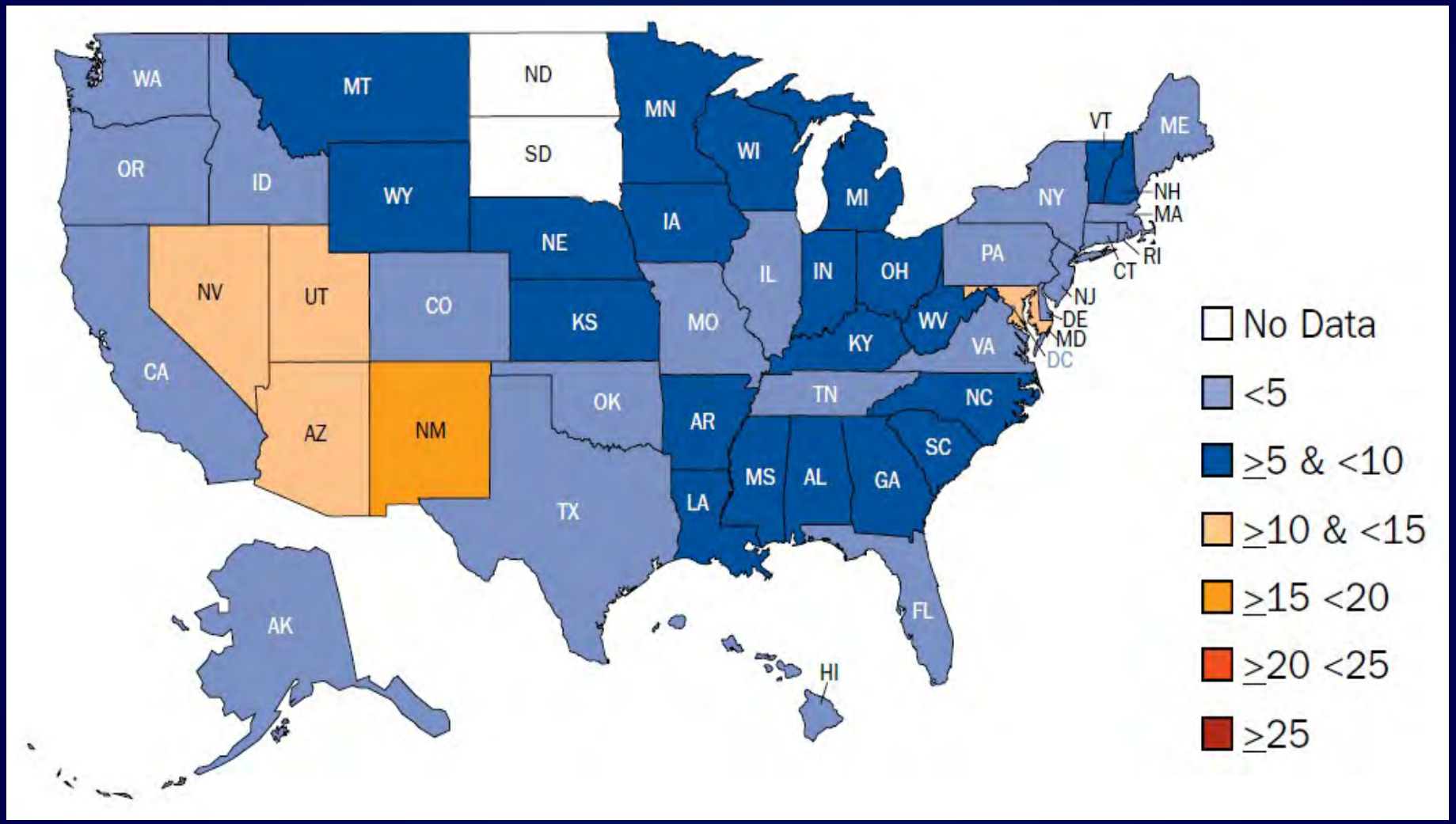
Prescription Drug Abuse

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



Source: Trust for America's Health, www.healthyamericans.org. "Prescription Drug Abuse: Strategies to Stop the Epidemic (2013)"

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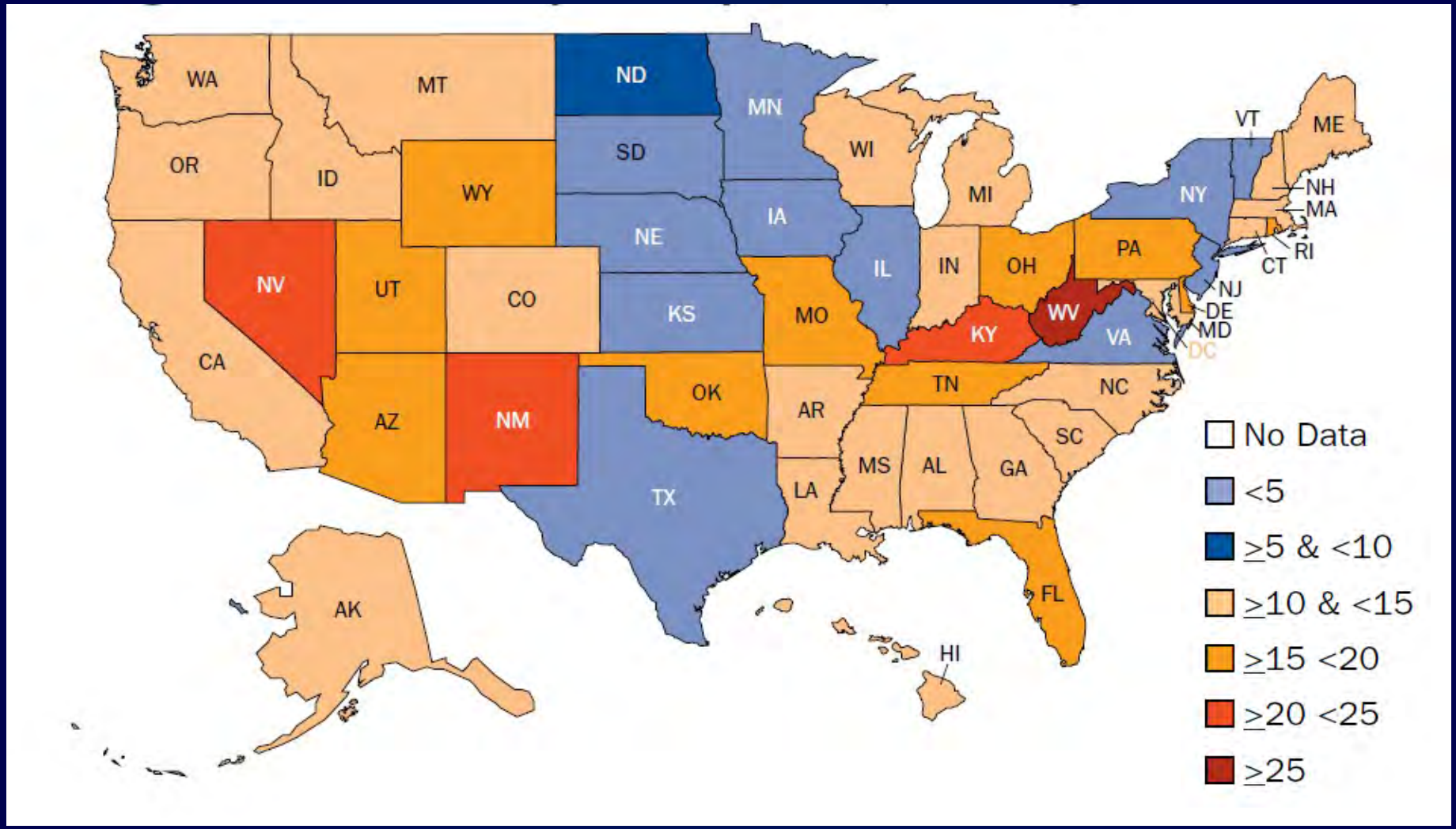
Drug Overdose Mortality Rates per 100,000 People 2010



Source: Trust for America's Health, www.healthyamericans.org. "Prescription Drug Abuse: Strategies to Stop the Epidemic (2013)"

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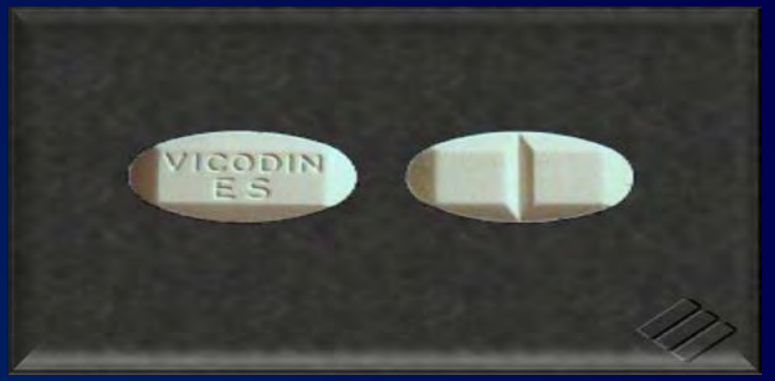
What People Are Abusing

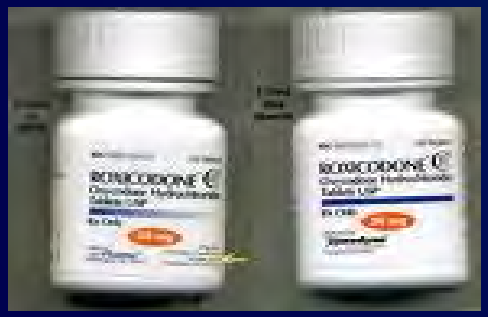
Commonly Abused Controlled Substances

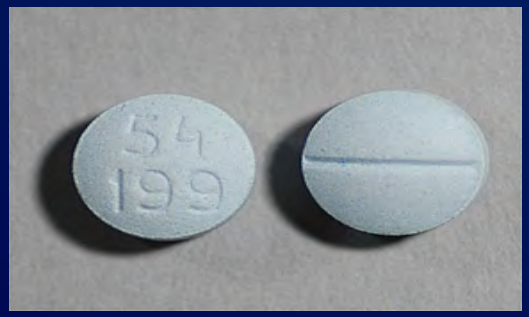


Hydrocodone

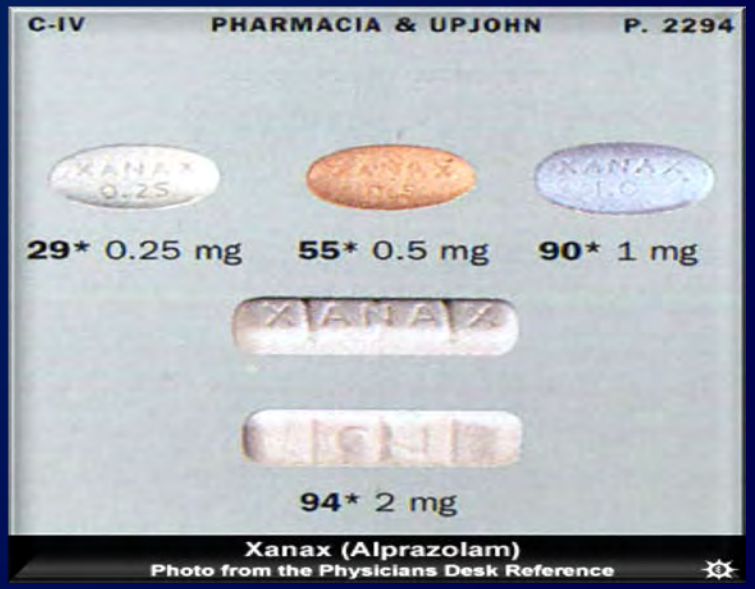
OxyContin 80mg

Oxymorphone





Oxycodone 30 mg



Alprazolam

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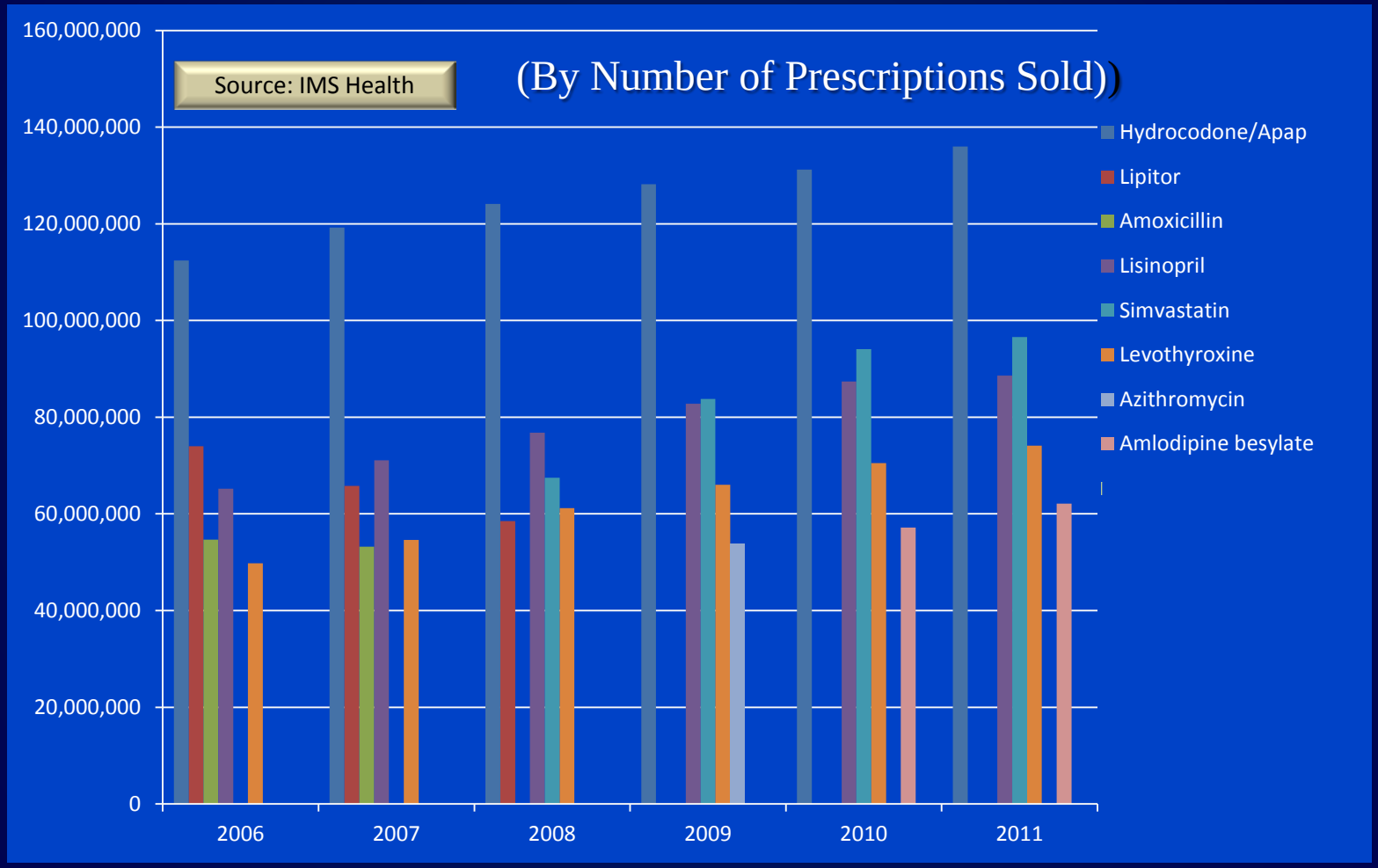
Top 5 Prescription Drugs Sold in the US 2006-2011



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

Worldwide Hydrocodone Use

- 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

SOURCE: UN International Narcotics Control Board website. Estimated World Requirements of Narcotic Drugs in grams for 2014. http://www.incb.org . Accessed April 14, 2014

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

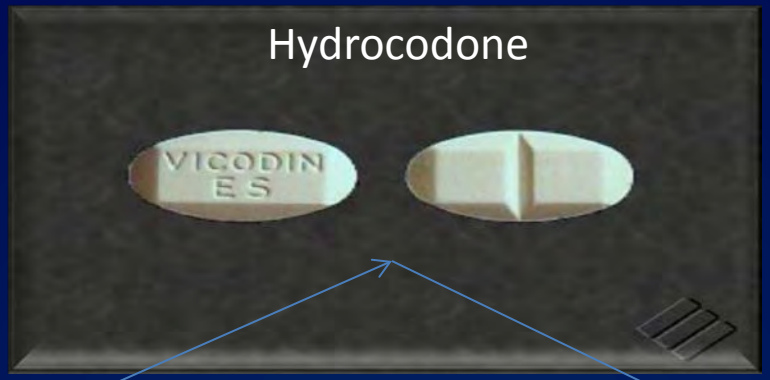
SOURCE: UN International Narcotics Control Board website. Estimated World Requirements of Narcotic Drugs in grams for 2014. http://www.incb.org . Accessed April 14, 2014

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%

SOURCE: UN International Narcotics Control Board website. Estimated World Requirements of Narcotic Drugs in grams for 2014. http://www.incb.org . Accessed April 14, 2014

The Trinity



Opiate

Muscle Relaxant

Benzodiazepine

Oxycodone

- 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

U.S. Drug Enforcement Administration
Office of Diversion Control

The Circle of Addiction & The Next Generation

Oxycodone Combinations
Percocet®
$7-$10/tab

OxyContin®
$80/tab

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

Heroin
$15/bag

Hydrocodone
Lorcet®
$5-$7/tab

Heroin: No Longer Confined to Urban Areas

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The Examiner
WASHINGTON
WEDNESDAY, DECEMBER 5, 2012

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'Liaisons Dangereuses'
New approach to classic P. 19

Playoff possibilities
Schedule favors Skins P. 35

Cooling down
60° 34°
DETAILS P. 4

POLITICS
Stalemate on 'cliff'
Sides stop talking; Obama's rate hikes may be flexible. P. 13

LOCAL
FBI analyst busted

Heroin use spikes in area suburbs
Pill addicts risk deadly drug

The CSA: Checks and Balances

Mission

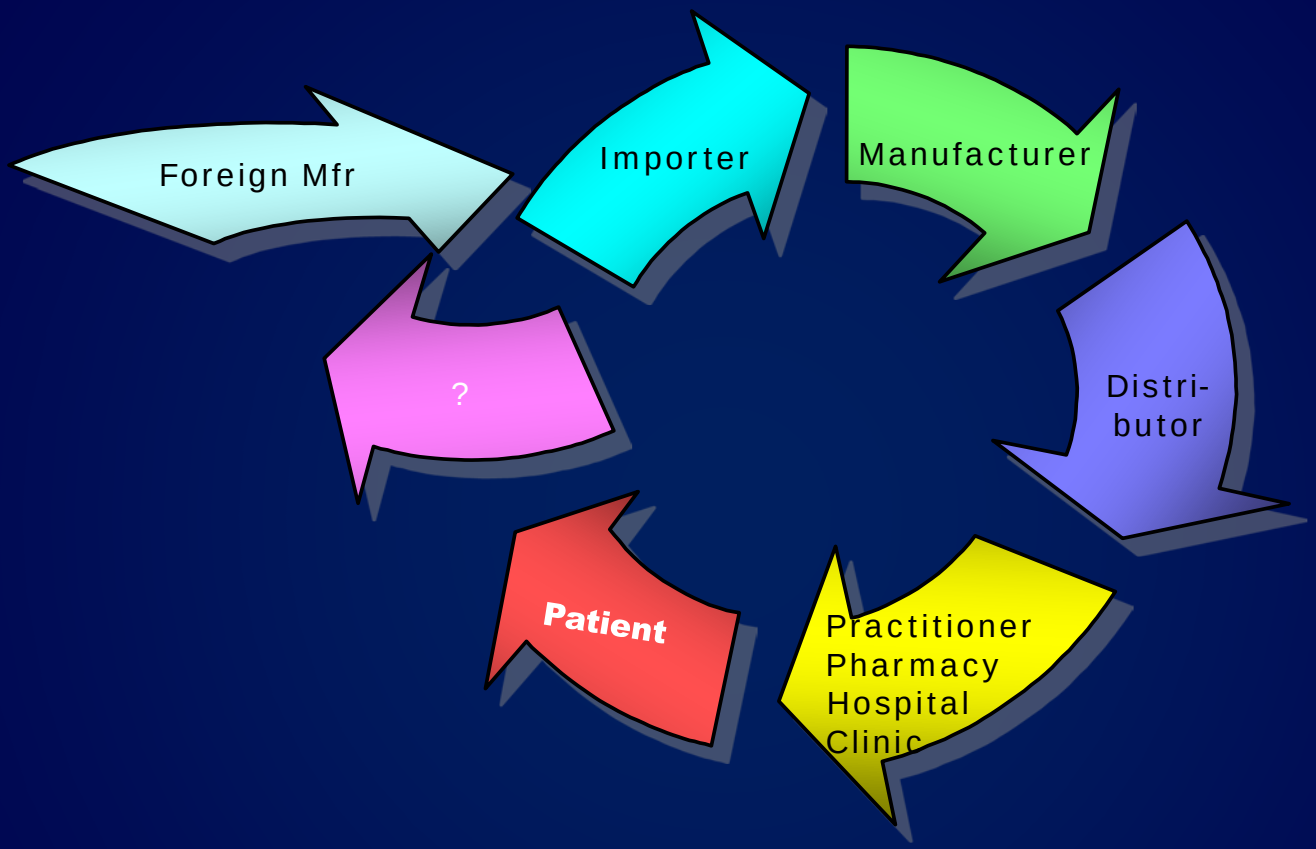
The mission of the Office of Diversion Control is to prevent, detect, and investigate the diversion of pharmaceutical controlled substances and listed chemicals from legitimate channels of distribution

while …

ensuring an adequate and uninterrupted supply of controlled substances to meet legitimate medical, commercial, and scientific needs

Cutting off the Source of Supply

Closed System of Distribution

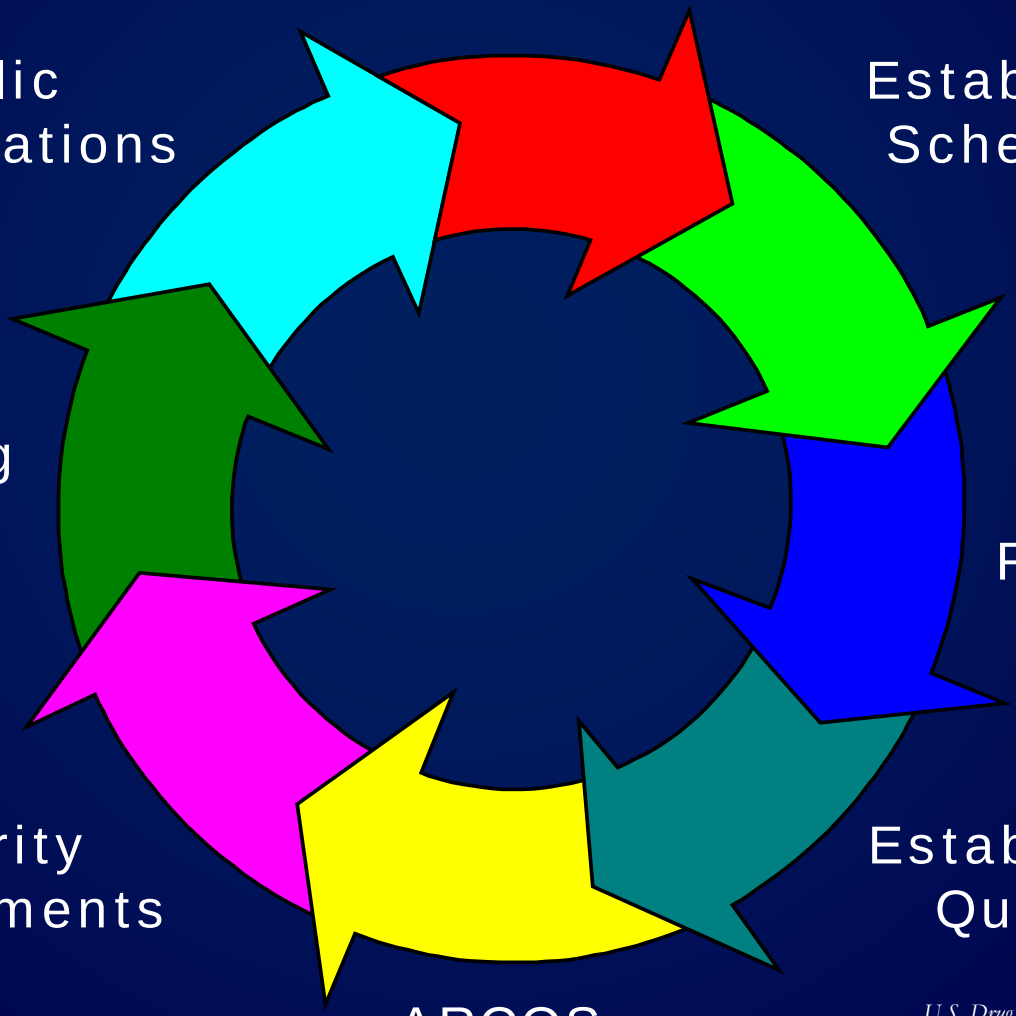


1,552,539 (09/05/2014)

- **Practitioners: 1,195,941**
- **Retail Pharmacies: 70,289**
- **Hospital/Clinics: 16,120**

U.S. Drug Enforcement Administration
Office of Diversion Control

Closed System of Distribution



Closed System of Distribution

The DEA is responsible for:

- **the oversight of the system**
- **the integrity of the system**
- **the protection of the public health and safety**

DEA Registrant Initiatives

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

DEA Registrant Initiatives

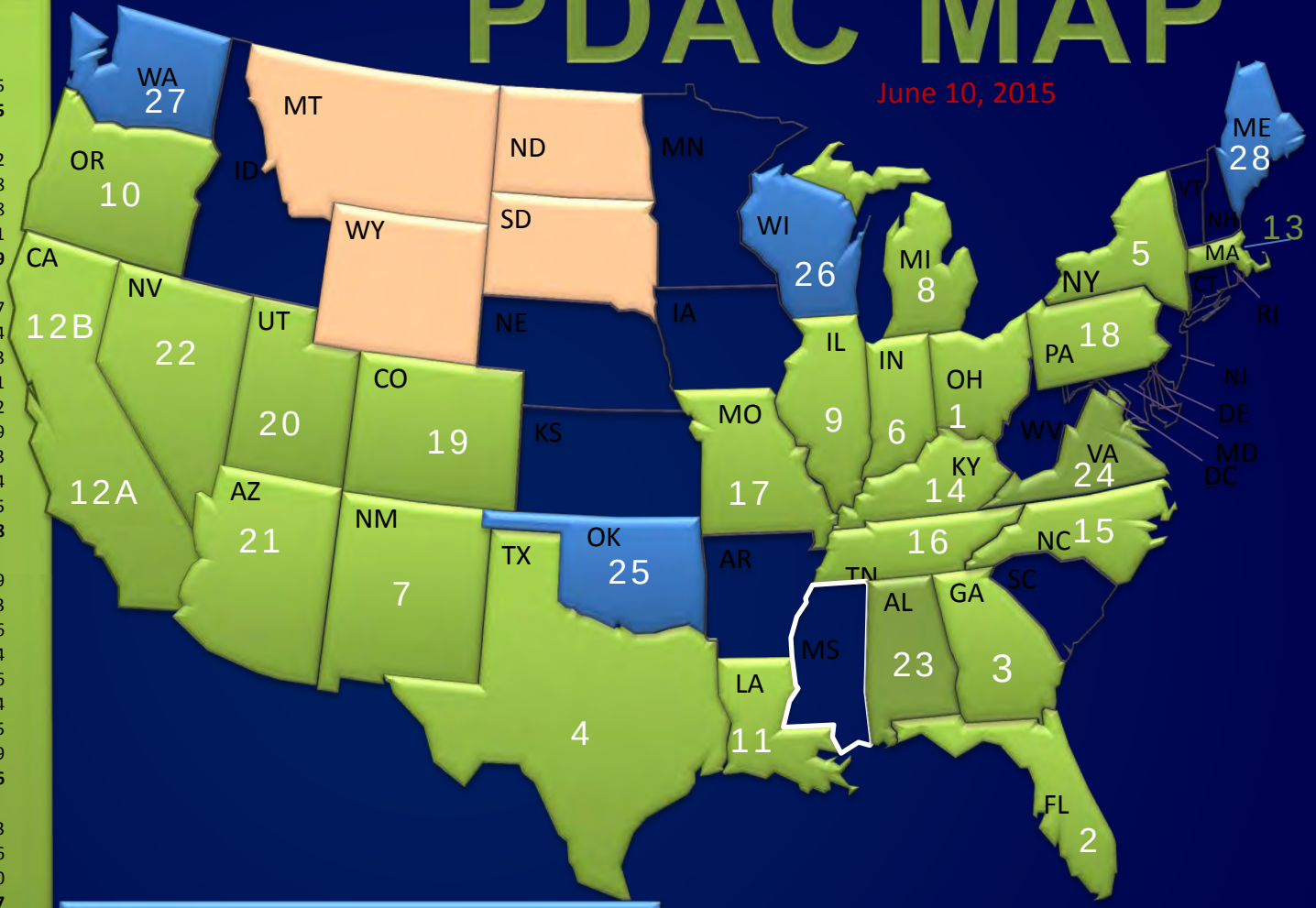
Pharmacy Diversion Awareness Conference

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

PDAC MAP

June 10, 2015

Completed PDACs	Attendance
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
13-Boston, MA 9/21-22/13	275
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

- Completed PDACs
- Proposed PDACs
- Postponed PDACs

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

Effective Controls

21 CFR § 1301.71(a)

"All applicants and registrants shall provide effective controls and procedures to guard against theft and diversion of controlled substances."

Effective Controls

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)*

Corresponding Responsibility

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.

Corresponding Responsibility

- 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!!!

DEA Legal Resources

- 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

Disposal 21 CFR § 1317

Ultimate User

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

Ultimate User Methods of Disposal Prior to Disposal Final Rule

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.

Secure and Responsible Drug Disposal Act of 2010

- 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

- 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

- 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)

Authorized to Collection

- 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.

21 CFR § 1317.40

Registrant Disposal

Registrant Disposal - Inventory

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

Destruction of Controlled Substances

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)

Destruction Procedures

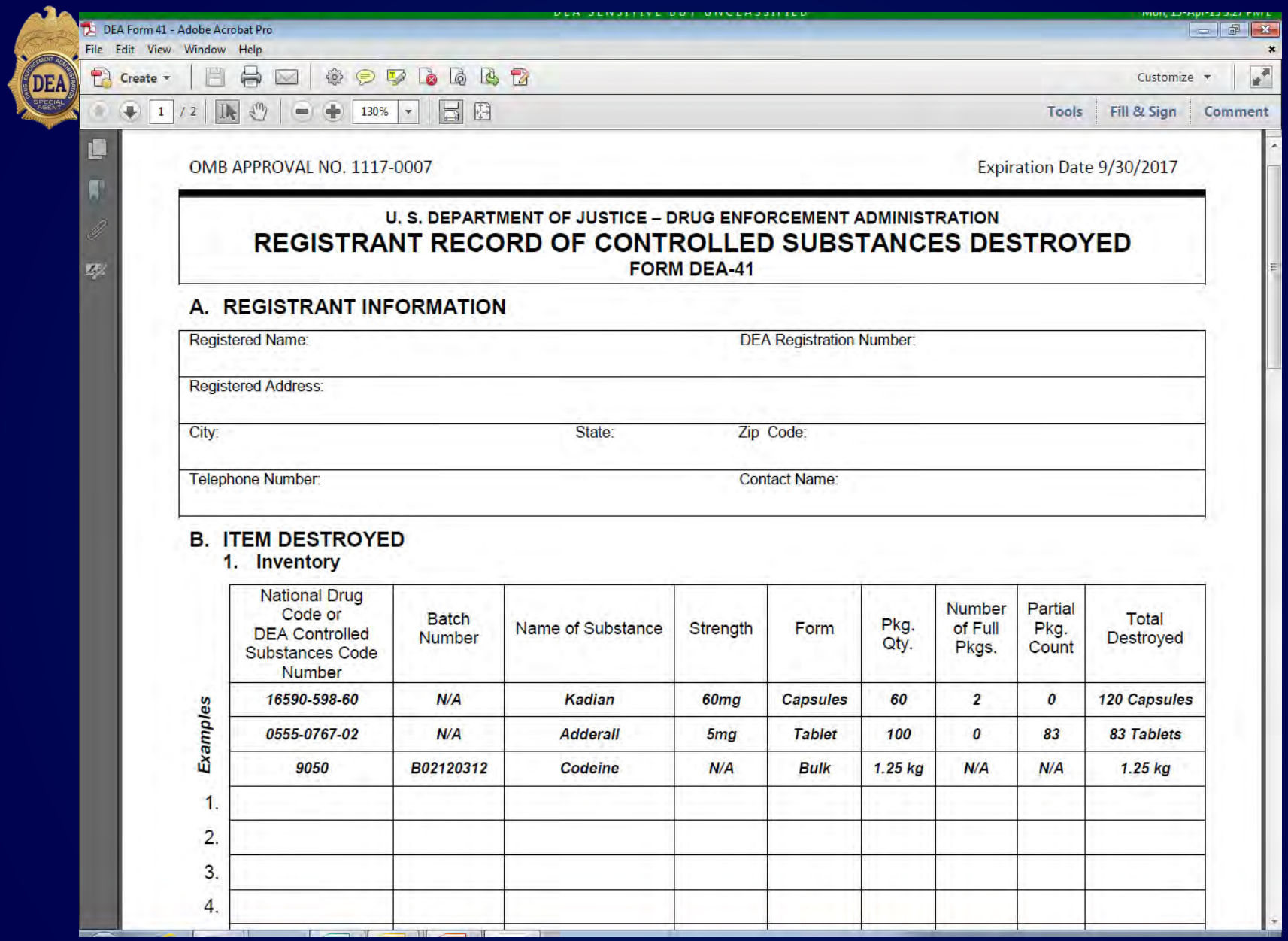
- 2 employees of the registrant shall handle or observe the handling of any controlled substance until it is rendered non-retrievable, and
- 2 employees of the registrant shall personally witness the destruction of the controlled substance until it is rendered non-retrievable.

21 CFR § 1317.95(c) and (d)

DEA Form 41

- 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)



OMB APPROVAL NO. 1117-0007 Expiration Date 9/30/2017

U. S. DEPARTMENT OF JUSTICE – DRUG ENFORCEMENT ADMINISTRATION

REGISTRANT RECORD OF CONTROLLED SUBSTANCES DESTROYED

FORM DEA-41

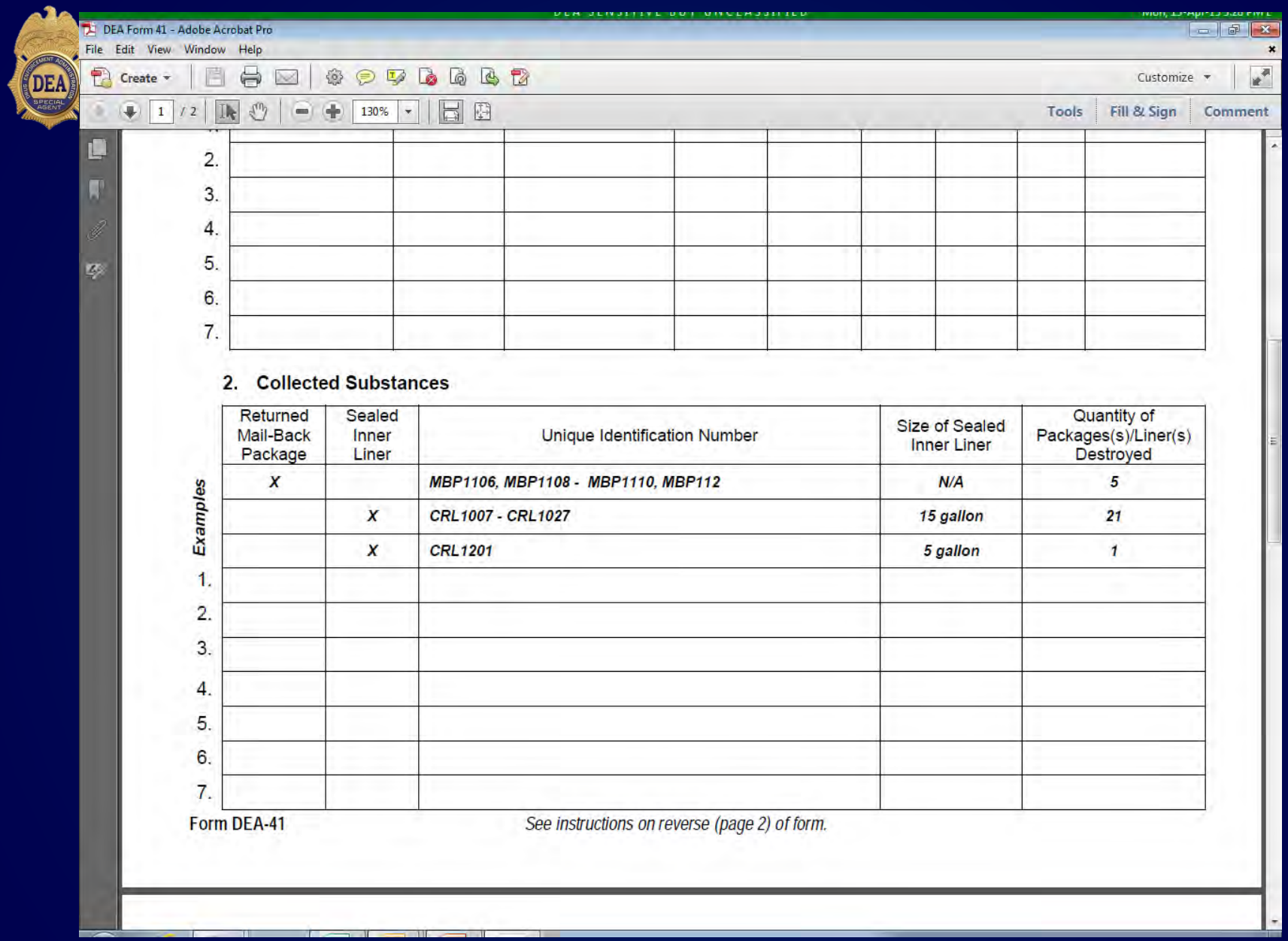
A. REGISTRANT INFORMATION

Registered Name:		DEA Registration Number:
Registered Address:		
City:	State:	Zip Code:
Telephone Number:		Contact Name:

B. ITEM DESTROYED

1. Inventory

	National Drug Code or DEA Controlled Substances Code Number	Batch Number	Name of Substance	Strength	Form	Pkg. Qty.	Number of Full Pkgs.	Partial Pkg. Count	Total Destroyed
Examples	*16590-598-60*	*N/A*	*Kadian*	*60mg*	*Capsules*	*60*	*2*	*0*	*120 Capsules*
	0555-0767-02	*N/A*	*Adderall*	*5mg*	*Tablet*	*100*	*0*	*83*	*83 Tablets*
	9050	*B02120312*	*Codeine*	*N/A*	*Bulk*	*1.25 kg*	*N/A*	*N/A*	*1.25 kg*
1.									
2.									
3.									
4.									


DEA Form 41 - Adobe Acrobat Pro

File Edit View Window Help

Create Customize

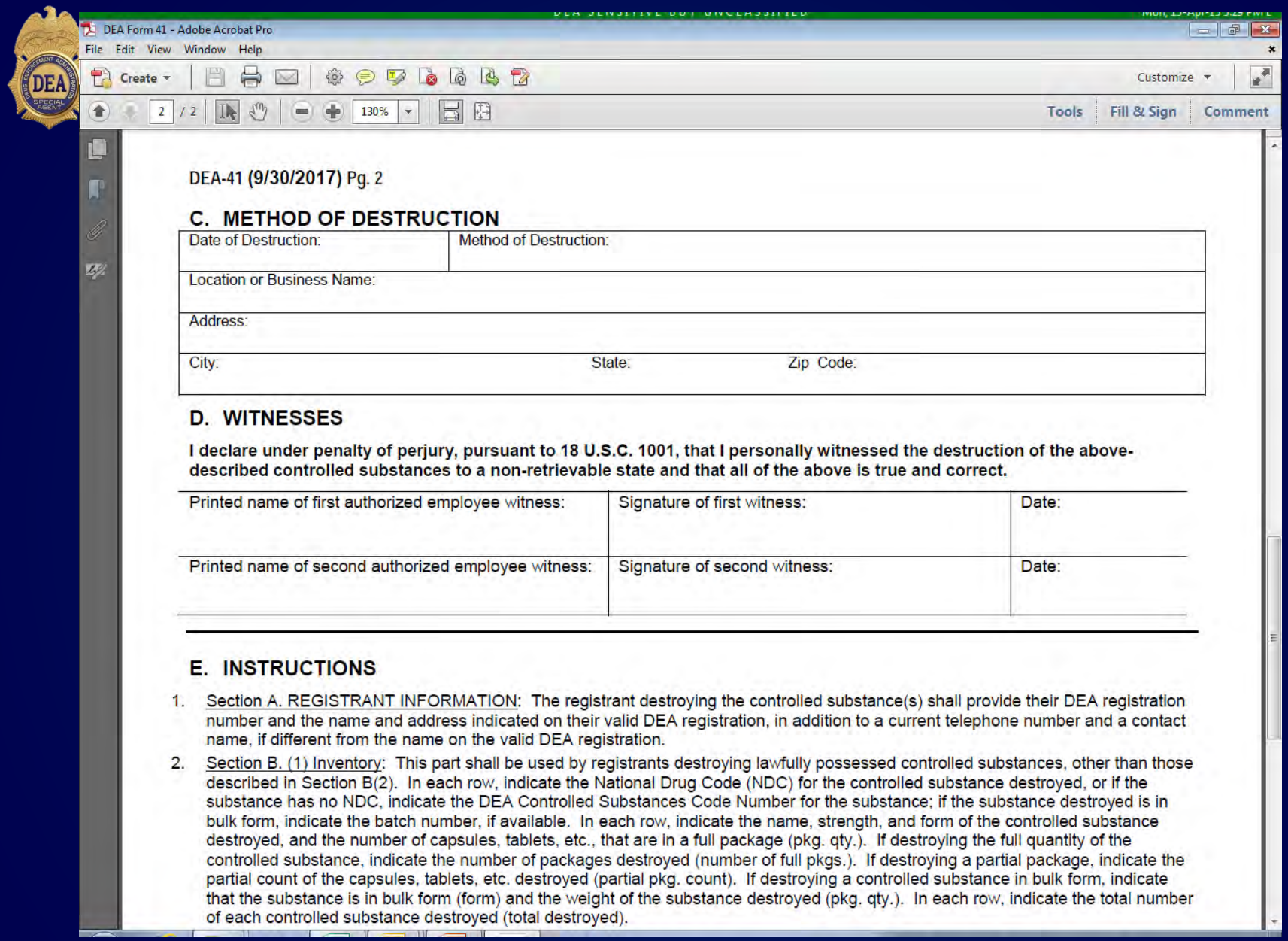
1 / 2 130% Tools Fill & Sign Comment

2.									
3.									
4.									
5.									
6.									
7.									

2. Collected Substances

	Returned Mail-Back Package	Sealed Inner Liner	Unique Identification Number	Size of Sealed Inner Liner	Quantity of Packages(s)/Liner(s) Destroyed
Examples	*X*		*MBP1106, MBP1108 - MBP1110, MBP112*	*N/A*	*5*
		X	*CRL1007 - CRL1027*	*15 gallon*	*21*
		X	*CRL1201*	*5 gallon*	*1*
1.					
2.					
3.					
4.					
5.					
6.					
7.					

Form DEA-41 *See instructions on reverse (page 2) of form.*



DEA-41 **(9/30/2017)** Pg. 2

C. METHOD OF DESTRUCTION

Date of Destruction:	Method of Destruction:	
Location or Business Name:		
Address:		
City:	State:	Zip Code:

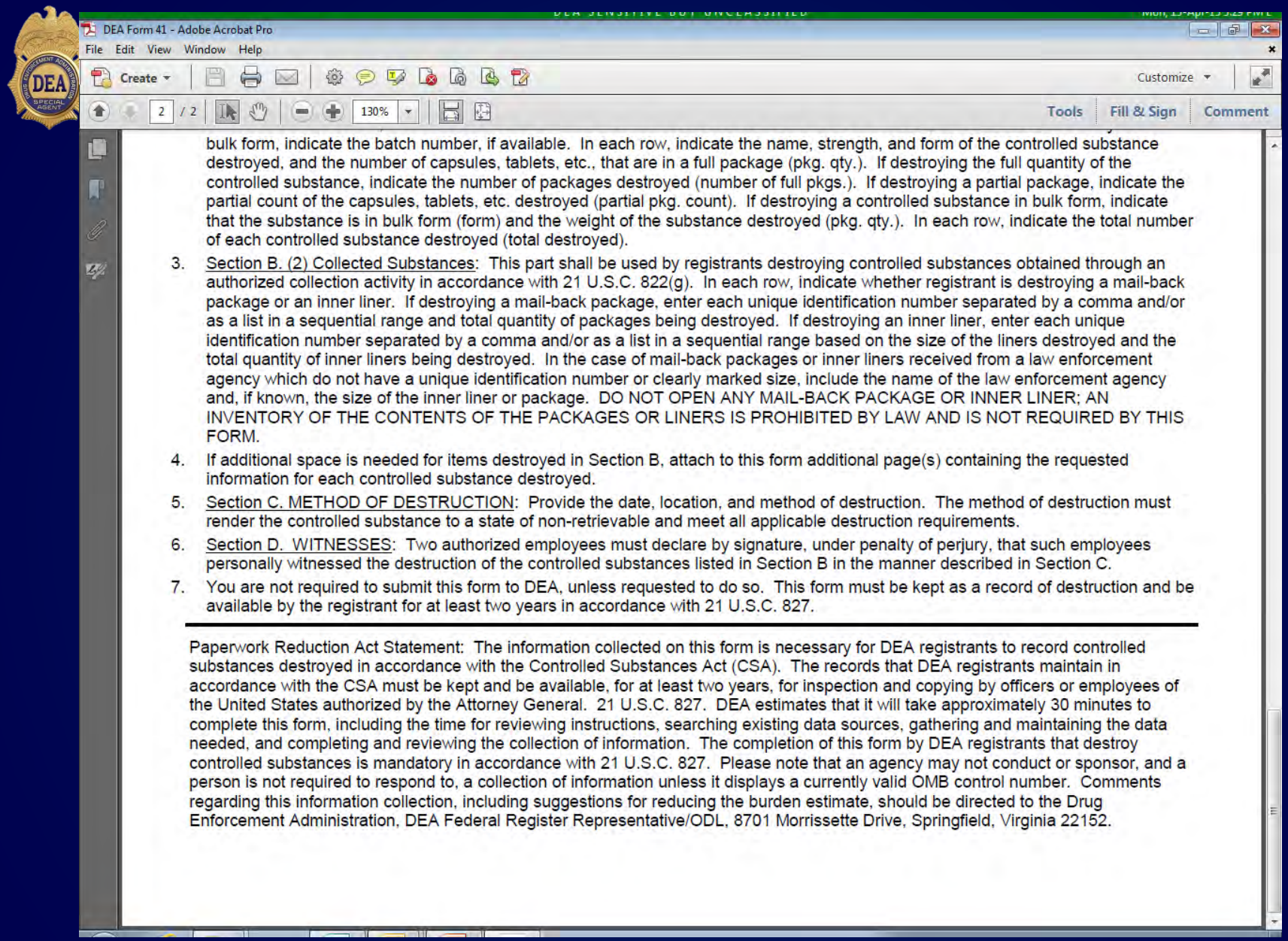
D. WITNESSES

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.

Printed name of first authorized employee witness:	Signature of first witness:	Date:
Printed name of second authorized employee witness:	Signature of second witness:	Date:

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).



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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.

Reports Required by 21 CFR

deadiversion.usdoj.gov/21cfr_reports/surrend/index.html#instruct

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INSTRUCTIONS
Registrant Record of Controlled Substances Destroyed - DEA Form 41

It is recommended that registrants review **21 CFR §1317 — Disposal**

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).
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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**.

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DEA Form 106

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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.

OMB APPROVAL
No. 1117-0001
(Expiration Date 9/30/2017)

1. Name and Address of Registrant (include ZIP Code)

2. Phone No. (Include Area Code)

3. DEA Registration Number

4. Date of Theft or Loss

5. Principal Business of Registrant (Check one)
- 1 ☐ Pharmacy
- 2 ☐ Practitioner
- 3 ☐ Manufacturer
- 4 ☐ Hospital/Clinic
- 5 ☐ Distributor
- 6 ☐ Methadone Program
- 7 ☐ Other (Specify) _____

6. County in which Registrant is Located

7. Was Theft reported to Police?
☐ Yes ☐ No

8. Name and Telephone Number of Police Department (Include Area Code)

9. Number of Thefts or Losses Registrant has Experienced in the Past 24 Months

10. Type of Theft or Loss (Check one and complete items below as appropriate)
- 1 ☐ Night Break-in
- 2 ☐ Armed Robbery
- 3 ☐ Employee Pilferage
- 4 ☐ Customer Theft
- 5 ☐ Other (Explain)
- 6 ☐ Lost in Transit (Complete Item 14)

11. If Armed Robbery, was Anyone:
Killed? ☐ No ☐ Yes (How Many) _____
Injured? ☐ No ☐ Yes (How Many) _____

12. Purchase value to Registrant of Controlled Substances taken?
$

13. Were any pharmaceuticals or merchandise taken?
☐ No ☐ Yes (Est. Value)
$

14. IF LOST IN TRANSIT, COMPLETE THE FOLLOWING:

A. Name of Common Carrier

B. Name of Consignee

C. Consignee's DEA Registration Number

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DEA Form 106 - Adobe Acrobat Pro
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14. IF LOST IN TRANSIT, COMPLETE THE FOLLOWING:

A. Name of Common Carrier	B. Name of Consignee	C. Consignee's DEA Registration Number

D. Was the carton received by the customer?	E. If received, did it appear to be tampered with?	F. Have you experienced losses in transit from this same carrier in the past?
☐ Yes ☐ No	☐ Yes ☐ No	☐ No ☐ Yes (How Many) _____

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?

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:

A. Other Federal law enforcement and regulatory agencies for law enforcement and regulatory purposes.

B. 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.

FORM DEA-106 Previous editions obsolete

CONTINUE ON REVERSE

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Form DEA-106 (9/30/2017) Pg. 2

LIST OF CONTROLLED SUBSTANCES LOST OR STOLEN

	Trade Name of Substance or Preparation	NDC Number	Name of Controlled Substance in Preparation	Dosage Strength	Dosage Form	Total Quantity Lost or Stolen
Examples	Desoxyn	00074-3377-01	Methamphetamine Hydrochloride	5 mg	Tablets	300
	Demerol	00409-1181-30	Meperidine Hydrochloride	50 mg/ml	Vial	150 ml
	Robitussin A-C	00031-8674-25	Codeine Phosphate	2 mg/cc	Liquid	5676 ml
1.						
2.						
3.						
4.						
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6.						
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9.						
10.						
11.						
12.						
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15.						
16.						
17.						
18.						
19.						
20.						

Remarks: (Optional)

Express Quantity in Dosage Units, or Milliliters for Liquids

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

Sign and Print Name _____ Title _____ Date _____

DEA SENSITIVE DOJ UNCLASSIFIED

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

	Mail-Back Package	Inner Liner	Unique Identification Number(s)	Size of Inner Liner	Total Quantity Lost or Stolen
Examples	X		MBP1106, MBP1108 – MBP1110, MBP1112	N/A	5
		X	CRL1007 – CRL1027	15 GALLON	21
		X	CRL1201	5 GALLON	1
1.					
2					
3.					
4.					
5.					
6.					
7.					
8.					

Remarks: (Optional)

Express in Total Quantities

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

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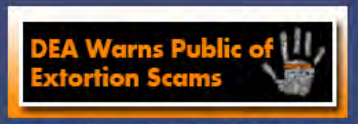
DEA

UNITED STATES
Drug Enforcement Administration

TOUGH WORK, VITAL MISSION

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.

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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
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UNITED STATES
Drug Enforcement Administration

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- History
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  - Domestic Office Locations
  - Foreign Office Locations
- Leadership
- Museum
- Wall of Honor

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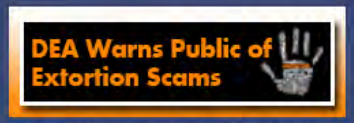

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OFFICE LOCATIONS

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.

DOMESTIC FIELD DIVISIONS

Atlanta Division
Chicago Division
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

DEA Warns Public of Extortion Scams

$5 MILLION REWARD

The Dangers and Consequences of Marijuana Abuse

RESOURCE CENTER

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Office of Diversion Control

www.deadiversion.usdoj.gov

DEA Web-Based Resources

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DEA Web-Based Resources

www.JustThinkTwice.com

DEA Web-Based Resources

www.GetSmartAboutDrugs.com

Thank You