

Storage

Principal Investigators (PI) are responsible for providing and maintaining secure storage for their Controlled Substances inventory that meets these criteria:

Store Controlled Substances according to schedule number:

- **Schedule I-II:** Store in a safe or steel cabinet equivalent
- **Schedule III-V:** may be stored in a locked drawer or cabinet that is inaccessible from above or below.

Store Controlled Substances in their own unique storage unit, together with the Controlled Substances binders provided by OH&S.

Steel cabinets and drawers must be able to accommodate up to two Controlled Substances Binders if using both Schedule II and Schedule III-V drugs.

This requires a steel cabinet with minimum size of 11" wide x 15" high x 6" deep. Contact OH&S at 205-934-2487 before purchasing a storage unit to confirm it meets all DEA and OH&S requirements.

Separate shelves are required for Schedule II and schedules III-V drugs, if stored together inside one safe

Equipment

Install the following equipment according to these standards:

- **Padlocks and hinges:** Must have the mounting screws or bolts of the hasp inaccessible when the door is closed and the lock is fastened.
- **Safes and steel cabinet equivalents:** Must be cemented or bolted to the floor or wall, or weigh more than 750 pounds.
- **Storage units:** Must be secure enough to show forced entry.
- **Drawers:** Must be inaccessible from the upper or lower drawers in the stack. Assign the top drawer of the stack to use as the storage facility, if possible.

Storage and Security for Controlled Substances Job Aid

Storage and Security

- **DO NOT** share Controlled Substances storage facilities. You must have your own unique storage unit for your drugs. If you are in a lab with shared space, each researcher must maintain their own, separate, CSUA numbers and storage units.
- **DO NOT** transfer Controlled Substances from its original container for storage purposes. It must be labeled at all times with the original information from the manufacturer.
- **DO NOT** store other chemicals or supplies in a Controlled Substances storage unit.
- **DO NOT** store Controlled Substances in a corridor. They must be kept under lock and key in an area inaccessible to the public.

Access Control

Restrict access only to authorized personnel on your Controlled Substances Use Authorization (CSUA) and follow these precautions:

- Keep storage key(s) in the physical custody of personnel authorized to have access to keys at all times. You can make multiple key copies and assign them to authorized key holders.
- Do **not** store keys in a drawer or on **the wall**.

Outside the Storage Units

Wheeled storage units are **NOT** allowed for Controlled Substances! Padlocks and hinges must have mounting screws or bolts of the hasp inaccessible when the door is closed, and the lock is fastened.

Storage and Security for Controlled Substances Job Aid

Inside the Storage Units

No matter what types of storage unit you are using, the DEA has specific rules for how things are stored inside the device.

Separate storage for Schedules I-II and Schedule III-V is a requirement of the DEA. However, **if you must have both in the same secure storage area, you MUST:**

- Store the Schedule I-II Controlled Substances and the matching folder together on one shelf, and
- The Schedule III-V Controlled Substances with the matching folder together on a different shelf. .

Personnel changes

When Authorized Personnel leave their position in the lab:

- Change combinations or retrieve the individual's keys.
- Document authorized personnel security changes in your Controlled Substances Binder.
- Remove the authorized personnel by amending your CSUA through the website.

Your Responsibilities

It is your responsibility to provide effective controls so as to:

- Guard against theft or diversion
- Prevent illegal drug use
- Protect the public from harm that may result from substances under your care

This includes the use of Controlled Substances at any time for:

- Research animals
- Veterinary care
- In-vitro research (such as cell culture, patch clamping, or tissue processing)
- Chemical research (including synthesis and reaction)