

FACT SHEET: Controlled Substance Licenses



NEED TO KNOW:

1. CS purchased with a license from one faculty member cannot be used by others.
2. Only Tulane Faculty can acquire DEA licenses in this way. Postdocs, students, etc are not eligible.
3. Inform OEHS if you have or are planning to acquire a DEA License.
4. There are substantial documentation requirements for maintaining a DEA license. Visit the OEHS Controlled Substances Page for more resources: <https://oehs.tulane.edu/controlled-substances>

MORE INFO:



TULANE UNIVERSITY
Office of Environmental
Health & Safety
(504) 988-5486 | OEHS@tulane.edu

Certain drugs and chemical precursors fall under the Drug Enforcement Administration (DEA) and Louisiana Board of Pharmacy (LABP) regulations. Tulane Faculty who use these Controlled Substances in the course of their research or teaching must maintain both a DEA and LABP license in good standing and participate in the Tulane Controlled Substances Program. This program is run by the Office of Research Compliance and OEHS.

PERMISSION:

- To become a License Holder, the Faculty member must contact the Tulane Office of Research Compliance. They must receive approval by the Tulane Vice President of Research via a Letter of Verification Request Form for Controlled Substances. This form is available from Research Compliance and must be signed by the Faculty Member's Departmental Chair or Dean (if the applicant is a Chair).
- The Faculty member must complete the "Use of Controlled Substances in Research" training module available on TULearn or via a live training session with OEHS. This training must be completed annually by the License holder and any Authorized Users of Controlled Substances sourced using their license.

LABP APPLICATION:

- Apply to the LABP for a license by completing the "Application for New Controlled Dangerous Substances License for Selected Persons and Organizations". The "Practice Address" on the form should list ALL LOCATIONS where the new Licensee will store and use Controlled Substances.
- LABP may require a background check. NOPD can provide fingerprinting services if needed.

DEA APPLICATION:

- Apply for a DEA License only after receiving an LABP license.
- Applicants use DEA Form 225 available at <http://www.deadiversion.usdoj.gov/drugreg/index.html>
- The DEA may conduct a site inspection and interview with the applicant. OEHS staff are available to assist with questions from the DEA about university CS policies.

** If the LABP or DEA requests the Licensee's IACUC protocol, do not send it. Instead, contact the IACUC Director for assistance*

LICENSE MAINTENANCE:

- Licenses must be renewed and maintained in good standing. Keep copies available near your other CS records.
- LABP may conduct periodic inspections of your records and storage. OEHS conducts similar inspections annually to prepare licensees for inspection by the regulator.

OEHS offers a drug disposal service to researchers with DEA licenses.

- To participate, the researcher must complete the OEHS Renewal Form and have their controlled substances inspected by OEHS annually.
- Complete Sections A & B of DEA Form 41 and email to OEHS@tulane.edu.
- OEHS will schedule a drug destruction.
- Afterwards, keep a copy of the signed Form 41 for at least 2 years.

NOTE: While awaiting disposal, keep expired/unwanted drugs separate from the in use drugs.

ADDITIONAL RESOURCES:

- DEA Website: <https://www.deadiversion.usdoj.gov/>
- LABP Website: <https://www.pharmacy.la.gov/>