BFB-BUS-50: Controlled Substances

Responsible Officer:	Chief Risk Officer
Responsible Office:	RK - Risk / EH&S
Issuance Date:	12/4/2025
Effective Date:	12/4/2025
Scope:	This Policy applies to University of California (UC) faculty, staff, and Authorized Individuals who use Controlled Substances, Controlled Substance Analogues, DEA Listed Chemicals, and/or California Precursor Chemicals in UC research and teaching activities. This Policy does not apply to Controlled Substance use in connection with any veterinary patient care or diagnostic activities performed by a UC veterinary teaching hospital or diagnostic laboratory, nor does it apply to human patient care activities performed by a UC health system, pharmacy, or clinic. Controlled Substance use conducted in connection with patient care activities is governed by federal and state laws regarding Controlled Substances and/or California Precursor Chemicals and also is governed by federal and state licensing, accrediting and regulatory agencies and subject to such administration rules as well as review and audit by those agencies. Each UC entity using Controlled Substances in connection with patient care activities as described in this Policy is responsible for the monitoring and oversight of the Controlled Substances program.

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I. POLICY SUMMARY

This Policy defines the roles and responsibilities for establishing and maintaining a Controlled Substance Program within the UC. This document allows University locations to tailor their programs to comply with practices of local Drug Enforcement Administration (DEA) field division offices, as well as federal and state law. University locations must develop detailed written procedures to implement this Policy and to document compliance with federal and state laws on acquiring, maintaining, storing, using, and disposing of Controlled Substances. (See the Federal Controlled Substances Act, 21 U.S.C. §§801 – 971 and implementing regulations at 21 C.F.R. §§1300 – 1399; and the California Uniform Controlled Substances Act, California Health and Safety Code §11100 – 11651 and implementing regulations at 11 California Code of Regulations §§800 – 810.7.) This document also identifies requirements for Individual Registrations not covered by the Campus Controlled Substance Program.

II. DEFINITIONS

Authorized Individual – A Principal Investigator (PI) or laboratory member who meets criteria of relevant regulations and policies to possess or use Controlled Substances

Authorized University Activities – University approved research, veterinary care associated with research, and teaching uses of Controlled Substances, including Dangerous Drugs and/or Devices, Listed Chemicals, and California Precursor.

California Precursor Chemical – Any substance listed under California Health and Safety Code §11100 et seq.

Campus Controlled Substance Program – A program established by each UC location to facilitate compliance with applicable requirements and procedures associated with the procurement, storage, use, Transfer, disposal, and inspection of schedule II-V Controlled Substances for Authorized University Activities.

Campus Designation – DEA Authorization to include specific Controlled Substance storage locations and/or business activities on a campus under a single applicable DEA researcher registration. Extension of additional storage locations and/or business activities of Controlled Substances require collaboration with the local DEA field office and approval by the DEA Diversion Control Division.

Controlled Substance – Narcotic and non-narcotic drugs under the jurisdiction of the federal Controlled Substances Act and the California Uniform Controlled Substances Act, including but not limited to those substances listed in 21 C.F.R. §1308.11-1308.15.

Controlled Substance Analogue – Defined under Section 802(32)(A) of the Controlled Substances Act as follows:

> Except as specified by Section 802(32)(C), the term “Controlled Substance Analogue” means a substance

(i) the chemical structure of which is substantially similar to the chemical structure of a Controlled Substance in schedule I or II;

(ii) which has a stimulant, depressant, or hallucinogenic effect on the central nervous system that is substantially similar to or greater than the stimulant, depressant, or hallucinogenic effect on the central nervous system of a Controlled Substance in schedule I or II; OR

(iii) with respect to a particular person, where such person represents or intends to have a stimulant, depressant, or hallucinogenic effect on the central nervous system that is substantially similar to or greater than the stimulant, depressant, or hallucinogenic effect on the central nervous system of a Controlled Substance in schedule I or II.

Under section 802(32)(C), such term does not include:

(i) a Controlled Substance;

(ii) any substance for which there is an approved new drug application;

(iii) with respect to a particular person, any substance, if an exemption is in effect for investigational use, for that person, under section 355 of Title 21 of the U.S. Code governing food and drugs to the extent conduct with respect to such substance is pursuant to such exemption; or

(iv) any substance to the extent not intended for human consumption before such an exemption takes effect with respect to that substance.

Controlled Substance Controls - Controls related to ordering, receiving, prescribing, dispensing, administering, and documenting of Controlled Substances, including theft/loss and diversion monitoring.

Controlled Substance Program Officer (CSPO) – The position with operational responsibility for each location's Campus Controlled Substance Program.

Dangerous Drug or Device – The terms "Dangerous Drug" and "Dangerous Device" are defined in California Business and Professions Code Chapter 9, Division 2, Article 2 §4022 and include the following:

(a) Any drug that bears the legend "Caution: federal law restricts this device to sale by or on the order of a physician, pharmacist, veterinarian, etc." "Rx only" or words of similar import.

(b) Any device that bears the statement "Caution: federal law restricts this device to sale by or on the order of a physician, pharmacist, veterinarian, etc." "Rx only" or words of similar import.

(c) Any other drug or device by federal or state law can be lawfully dispensed only on prescription or furnished pursuant to Section 4006 (of the California Business and Professions Code).

Drug Enforcement Administration (DEA) – The administration responsible for enforcing the Controlled Substances laws and regulations of the United States.

DEA Listed Chemicals – A collective term that includes any DEA List I or List II chemical. Under C.F.R. §1300.02, a List I chemical specifically designated by the DEA Administrator in 21 C.F.R. §1310.02(a), and that, in addition to legitimate uses, is used in manufacturing a Controlled Substance in violation of the federal Controlled Substances Act and is important to the manufacture of a Controlled Substance. A DEA List II chemical is one specifically designated by the DEA Administrator in 21 C.F.R. §1310.02(b), and that, in addition to legitimate uses, is used in manufacturing a Controlled Substance in violation of the Controlled Substances Act.

DEA Registration – A DEA Registration under which business activity and coincident activity related to Controlled Substances is either required or permitted by 21 C.F.R. §1301.

Environment, Health and Safety (EHS) Department – The administrative unit that manages the location's Environment, Health and Safety programs. Actual name of the department may vary at each location.

Institutional Animal Care and Use Committee (IACUC) – The committee that oversees an institution's animal program and facilities to ensure the humane and ethical treatment of animals used in research, teaching, and testing. The IACUC reviews and approves all proposed animal use, conducts facility inspections, and handles concerns about animal care to ensure compliance with applicable federal laws and guidelines.

Institutional Review Board (IRB) – The respective location's committee formally designated to approve, monitor, and review biomedical and other research involving humans with the aim to protect the rights and welfare of the research subjects.

Investigational New Drug (IND) – A drug that has not been approved for general use by the Food and Drug Administration but is under investigation in clinical trials regarding its safety and efficacy first by clinical investigators and then by practicing physicians using subjects who have given informed consent to participate.

Materiel Manager – The position at each University location responsible for the procurement of Controlled Substances, DEA Listed Chemicals, and California Precursor Chemicals for Authorized University Activities in compliance with DEA Registrations, University or Laboratory policies, and the requirements of the location's Campus Controlled Substance Program.

Non-Patient Care Setting – An environment in which a Controlled Substance or Dangerous Drug and/or Device is used in teaching, research, or veterinary care associated with research.

Officer of the University – As defined by UC Regents Bylaw 32, individuals who are Level One Senior Management Group (SMG) members, which includes the position of President, all SMG positions that directly report to the Regents and/or the President, and the Chief Executive Officers of the medical centers.

Patient Care Setting – An environment in which Controlled Substances or Dangerous Drugs and/or Devices are used in a human or animal patient care applications not associated with research.

Power of Attorney – An official document in which a DEA registrant authorizes one (1) or more individuals to act for the registrant either (a) in issuing orders for schedule I or II Controlled Substances, executed in a form substantially similar to the sample Power of Attorney form at 21 C.F.R. §1305.05, or (b) in signing registration applications for an entity in compliance with 21 C.F.R. §1301.13.

Research Advisory Panel of California (RAPC) – A review body of the California Attorney General's office established pursuant to California Health and Safety Code §11480 & 11481, which reviews and authorizes proposed research projects involving certain opioid, stimulant, and hallucinogenic drugs classified as schedule I and schedule II Controlled Substances that require review under the California Health and Safety Code §11213.

Responsible Official – The position at a UC location with responsibility for oversight of the location's Controlled Substance Program. This responsibility falls to the Chancellor unless the Chancellor or other individual who is an Officer of the University delegates this role through a Power of Attorney.

Transfer – "Distribution" (as defined in 21 U.S.C. Section 802) of Controlled Substances from one practitioner who is registered to dispense a Controlled Substance to another such practitioner.

III. POLICY TEXT

All individuals affiliated with the UC who use Controlled Substances in connection with patient care, research, veterinary care, and teaching activities must comply with federal and state laws in addition to applicable Presidential Policies and procedures governing Controlled Substances. To assist UC personnel in complying with these regulations and with this Presidential Policy, specific institutional requirements have been established for the management of Controlled Substances used in teaching, research, or veterinary care associated with research.

A. Activities under the Campus Controlled Substance Programs

The University, through Campus Controlled Substance Programs, maintains institutional and/or departmental registrations with the DEA for research involving schedule II-V Controlled Substances. Researchers conducting Authorized University Activities must obtain schedule II-V Controlled Substances through the Campus Controlled Substance Program.

Requirements for Individual Registrations are detailed in section III(C). Although there is not a regulatory or Presidential Policy requirement that Campus Controlled Substance Programs oversee activities conducted under individual DEA Registrations, individuals who plan to apply for, seek modifications to, or terminate an individual DEA Registration for Controlled Substances that will be used on campus and/or in connection with Authorized University Activities, or who plan to

import or export Controlled Substances to be used on campus and/or in connection with Authorized University Activities, must notify and consult the campus CSPO (see sections III(C)(5) and III(D)(2)(a)). In addition, individual locations may choose to adopt local policies or procedures placing some or all aspects of such activities (including applications and management of individual DEA Registrations) into the purview of the Campus Controlled Substance Program. Campus Controlled Substance Programs may provide assistance for individual DEA Registration applicants and/or individuals working with Dangerous Drugs and/or Devices in the form of checklists, guidance documents, and FAQ materials.

The Campus Controlled Substance Programs and institutional and/or departmental DEA Registrations do not cover:

1. Activities conducted under an individual schedule II-V DEA Registration obtained outside of the Campus Controlled Substance Program. In accordance with their individual DEA Registration, such persons conducting activities under their individual DEA Registration are responsible for proper purchasing, recordkeeping, disposal, and other regulated practices;

2. Use of any schedule I drug. Consistent with federal law, researchers independently obtain individual DEA Registration for use of any schedule I drug in research;

3. Use of Controlled Substances in Patient Care Settings at the University. Pharmacists, physicians, and other providers supporting UC health systems, Student Health Services and other University clinics must solely operate under their own individual DEA Registrations.

4. Use of Controlled substances at non-UC institutions. When performing research at a non-UC facility, UC researchers will be subject to the host institution's Campus Controlled Substances Program. If there is no program, researchers will need to register independently for an individual DEA Registrations.

5. Authorized Individuals working in a research laboratory conducting Authorized University Activities with the use of Dangerous Drugs and/or Devices. Researchers are responsible for procuring, maintaining security of, keeping records for, and disposing of Dangerous Drugs and/or Devices in accordance with federal and state regulations. Dangerous Drugs and/or Devices may be ordered without a prescription as defined by California Business and Professions Code Chapter 9, Division 2, Article 3 §4059 and §4059.5. Dangerous Drugs and/or Devices not deemed Controlled Substances are not included in DEA Registration processes and, therefore, are not included in the Campus Controlled Substance Program; and

6. Use of DEA-exempt chemical preparations. A researcher need not obtain a DEA Registration to purchase and use DEA-exempt chemical preparations that meet the requirements of 21 C.F.R. §1308.24 and as listed in the Exempt Chemical Preparations List published by DEA's Diversion Control Division

(see Section VI. Related Information). For additional information, see section III(D)(4) of below (Complying with DEA-exempt Chemical Preparation Requirements for Working with DEA-exempt Preparations).

B. Campus Controlled Substance Program Requirements

The following requirements apply to schedule II-V institutional and/or departmental research registrations obtained through the Campus Controlled Substances Program.

1. **Campus Designations of a DEA Registration:** federal law requires that every location at which Controlled Substances are received or stored must obtain its own DEA Registration. UC locations may seek, and the DEA may grant, a Campus Designation request or other form of approval, which permits the University to receive or store Controlled Substances at different physical addresses or buildings on a contiguous campus or as otherwise authorized by the DEA. Campus Designations must be in the name of the campus or a campus department or school (or combinations or parts of those units). Any Campus Designation request must be evidenced by a written letter from the DEA Diversion Control Division approving the Campus Designation. No Controlled Substances may be received or stored under a schedule II-V institutional and/or departmental research registration without written approval by the CSPO while a Campus Designation request is pending.

2. **Authorization and Training:** Each University location must develop an authorization process and establish a training program for those who require access to Controlled Substances. Training must occur prior to authorizing an individual and, at a minimum, must include:

   a. Storage site controls and security;

   b. Ordering, delivery, and receipt;

   c. Usage logs and biennial inventory requirements;

   d. Transfers;

   e. Import and export policies;

   f. Disposal;

   g. Diversion and loss reporting; and

   h. Illicit activities and repercussions.

3. **Executed Power of Attorney Authorizing Personnel:** Each UC location may, through a Power of Attorney executed by the Chancellor or other individual who is an Officer of the University, authorize the Responsible Official, CSPO, or other individual to sign institutional DEA Registrations on

behalf of a University location. Only the Officer of the University may execute a Power of Attorney to another individual to issue orders for schedule I or II Controlled Substances for Authorized University Activities.

4. **Documentation of Compliance:** Each location must develop and publish written procedures that address the following federal or state requirements:

    a. **Ordering, procurement and distribution of Controlled Substances for research purposes.** At minimum, these must address:

        i. Restrictions on any individual's capacity to perform all of the following activities related to Controlled Substances: placement of an order with a supplier, receipt of a shipment from a supplier, distribution, and disposal;

        ii. General requisition, procurement, and distribution requirements and approval processes, including the identification of orders of unusual size or frequency or orders deviating substantially from a normal pattern;

        iii. The approval process and requisition information for Investigational New Drugs and schedule II drugs using DEA Form 222;

        iv. Orders for schedules III, IV, and V;

        v. Orders for DEA Listed Chemicals; and

        vi. Orders for California Precursor Chemicals.

    b. **Controls, storage, and security safeguards** to protect against unusual or suspicious acquisition and prevent unauthorized acquisition, access, use, theft, or diversion of Controlled Substances, DEA Listed Chemicals, and California Precursor Chemicals.

    c. **Personnel screening requirements** to ensure that no individual has access to Controlled Substances who has been convicted of a felony offense relating to Controlled Substances, whose application for registration with the DEA was denied, or whose registration was revoked or surrendered for cause (as required by 21 C.F.R. §1301.76 and §1301.90).

    d. **Recordkeeping and Inventory Requirements**, including:

        i. Power of Attorney forms;

        ii. Purchasing and associated records;

        iii. Distribution and chain-of-custody records;

iv. Proper retention schedules for acquisition, use, and disposition records;

v. Adequate recordkeeping by investigators or authorized personnel:

1. Usage log and inventory and biennial inventories; and

2. Separation of records by location.

e. Diversion, loss, or theft reporting of Controlled Substances, DEA Listed Chemicals, and California Precursor Chemicals: Individual Campus Controlled Substance Program procedures must specify which division or office is responsible for notifying

i. the local DEA field division office within one (1) business day about each theft or significant loss of Controlled Substances, as well as the subsequent submission of DEA Form 106 as required by 21 C.F.R. §1301.91;

ii. the local DEA field division office about any unusual or excessive loss or disappearance of a DEA Listed Chemical (if required by 21 C.F.R. § 1310.05(b)(1); or

iii. the California Department of Justice about any theft or loss of any California Precursor Chemical in writing within three days after the discovery if required by California Business & Professions Code § 11103.

f. Disposal or destruction of Controlled Substances must be in accordance with DEA policies, procedures, and regulations as required by 21 C.F.R. §1307.21.

5. Required Auditing and Monitoring: A routine auditing and monitoring program must be established and include inspections of researcher-maintained Controlled Substances and records for compliance with state and federal laws governing the use of Controlled Substances in Authorized University Activities.

C. Responsibilities of Individual / Other DEA Registrants

The following requirements apply to researchers with an Analytical Laboratory DEA Registration, individual schedule II-V DEA research registration (as permitted by the relevant University location), or individuals who are conducting research with the use of any schedule I drug. No individual may use Controlled Substances for any research in a Non-Patient Care Setting at any location without notice to the CSPO. The written procedure for the local Campus Controlled Substance Program must include clear guidelines for registrants not included in the Campus Controlled Substance Program. The location must identify in the procedure how affected researchers will be notified of these requirements (e.g., email or formal letter).

1. **DEA Registration:** In consultation with the CSPO, individuals must file and obtain approval for the appropriate DEA Registration prior to undertaking any activities with respect to Controlled Substances.

2. **Authorization and Training:**

    a. Ensure necessary researcher authorization for and training of individuals in the laboratory who are assigned work with Controlled Substances; and

    b. Maintain documentation to verify currently authorized researchers.

3. **Security, Storage, Inventory, Inspections, and Recordkeeping:**

    a. Maintain strict control over inventory and security of Controlled Substances. Appropriate controls can be identified in a consultation with the CSPO based on the DEA Registration type, the Controlled Substance's schedule, the amount being stored, and the physical security and access controls of the area in which it will be stored;

    b. Ensure that Controlled Substances covered under an individual DEA Registration are not intermingled in any manner with Controlled Substances covered under separate DEA Registrations and/or owned by the University or by other individuals or entities.

    c. Ensure authorized researchers receive, store, use, and dispose of Controlled Substances and continually maintain Controlled Substance usage logs in accordance with federal and state regulations and any applicable University Policies or local procedures;

        i. Under California BPC § 4105, maintain usage logs for three (3) years after the full use or disposal of Controlled Substances; and

    d. Complete and retain biennial inventory records as required by regulations.

4. **Potential Loss or Diversion Reporting:** Individual registrants must notify the CSPO and report to the local DEA field office within twenty-four hours of the discovery of any theft or significant loss of Controlled Substances, DEA Listed Chemicals, and California Precursor Chemicals. Individual registrants must also complete and submit DEA Form 106 “Report of Theft or Loss of Controlled Substances (and disposal receptacles)” or DEA Form 107 “Report of Theft or Loss of Listed Chemicals,” as applicable.

5. **Required Notification of CSPO Regarding DEA Registration Applications and Changes:** Individual registrants must notify the CSPO when applying for, transferring, modifying, or terminating a registration with the DEA that pertains to Controlled Substances used on campus and/or in connection with Authorized University Activities.

D. Additional Requirements for All DEA Registrants

1. **Illicit Activities:** Consistent with federal law, the University prohibits unlawful possession, sale, use, or distribution of illicit drugs by students and employees on University property or as part of any University activity. Illegal possession, sale, use, or distribution of Controlled Substances is subject to criminal sanctions under federal and state law. In addition, the University may pursue discipline, including employment action, against any employee found to have violated University policy prohibiting unlawful activities involving Controlled Substances on campus or as part of any University activity. Any member of the University community who suspects another member of such illicit activities should follow local reporting policies and procedures.

2. **Import, Export, Interstate and Intrastate Use, Transfers, and Transport:**

    a. **Imports and Exports:** Importation or exportation of Controlled Substances, DEA Listed Chemicals, or California Precursor Chemicals, including under an individual registration, requires prior written approval by the CSPO and must comply with federal and state laws and U.S. Food and Drug Administration (FDA) regulations. Such laws could require completion or approval of a permit or registration or could impose reporting requirements.

    b. **Interstate and Intrastate Use:** A separate DEA Registration and/or state license or registration may need to be obtained for use of Controlled Substances in research conducted outside of California or at a non-UC location within California. For this reason, any such use requires prior written approval by the CSPO. Campus Controlled Substance Programs can require prior written approval by the CSPO for such situations and should document the requirement in the Campus Controlled Substance Program written procedure.

    c. **Transfer:** Transfers of Controlled Substances, DEA Listed Chemicals, or California Precursor Chemicals must comply with federal and state laws. Such laws and regulations could apply to interstate or intrastate Transfer or even Transfer between University DEA Registrations or within a University DEA Registration. Such laws and regulations could limit the transferred amount or type of drug or chemical, require completion or approval of a permit or an order form request, or could impose reporting or registration requirements. For Transfers of substances under the purview of the Campus Controlled Substance Program, prior written approval by the CSPO is required, except for Transfers of DEA List II Chemicals or transfers between authorized locations covered by an institutional and/or departmental DEA designation.

    d. **Transport:** Movement of Controlled Substances off of University property in support of an Authorized University Activity, such as field research, requires prior approval from the CSPO.

e. **Foreign Jurisdictions:** In addition to complying with applicable U.S. and State laws regarding import, export, and registration regarding Controlled Substances, individuals working in foreign jurisdictions must comply with all applicable legal requirements of those jurisdictions. UC researchers who have questions about working in foreign jurisdictions should consult with local collaborators/partners, as applicable, and with their campus counsel and/or Controlled Substance Coordinator; in some cases, it may be necessary to engage outside local counsel with expertise in the rules applicable to foreign jurisdictions.

3. **Controlled Substance Analogues:** Research involving Controlled Substance Analogues, including but not limited to obtaining, dispensing, manufacturing, transferring, importing or exporting, is subject to federal and state laws. The classification of Controlled Substance Analogues is dependent on a number of factors, including but not limited to the chemical structure of the compound and whether the compound is intended for human consumption, as detailed in 21 C.F.R. §802. Due to the complexity of this analysis, the CSPO should be contacted prior to Controlled Substance Analogues being obtained, dispensed, manufactured, transferred, imported or exported.

4. **DEA-Exempt Chemical Preparations:** Exemptions are applicable only to the precise preparation or mixture described in the application submitted to and approved by the DEA and only for those sections of the Controlled Substances Act (CSA) and the Code of Federal Regulations specifically identified in the application. Any change in the quantitative or qualitative composition of the preparation or mixture or change in trade name or other designation of a preparation or mixture may result in loss of exempt status. Once a preparation or mixture is no longer exempt under 21 C.F.R. §1308.24, the preparation or mixture is a Controlled Substance, and the CSA and the DEA's implementing regulations apply.

5. **Approval for Research Involving Animal Subjects:** Only researchers engaged in Authorized University Activities who are acting within the scope of their authorized professional practice and with the approval of all applicable Institutional Animal Care and Use Committees (IACUC) may prescribe, furnish, dispense or administer Dangerous Drugs and/or Devices, including Controlled Substances, to animal research subjects.

6. **State Licensure for Research Involving Human Subjects:** Only California licensed medical personnel and researchers engaged in Authorized University Activities who are acting within the scope of their authorized professional practice and with the approval of all applicable Institutional Review Boards (IRB) may prescribe, furnish, dispense or administer Dangerous Drugs and/or Devices, including Controlled Substances, to human research subjects.

7. **Research Advisory Panel of California (RAPC):** Consistent with California law, Principal Investigators planning to conduct research projects in California using schedule I and/or II Controlled Substances may be required to obtain RAPC's review and approval. Guidance regarding the need and process for

obtaining RAPC review and approval can be found on the RAPC website (see Section VI. Related Information).

IV. COMPLIANCE / RESPONSIBILITIES

A. Campus Controlled Substance Programs

1. Chancellor or National Laboratory Director

a. Provide resources to effectively administer a Campus Controlled Substance Program;

b. Designate, in writing, a Responsible Official to establish and oversee the program; and

c. If appropriate, execute a Power of Attorney to authorize the Responsible Official to sign institutional DEA Registrations on behalf of the University location or to issue orders for schedule II Controlled Substances for Authorized University Activities. Any such authorization must be further evidenced by a Delegation of Authority.

2. Responsible Official

a. Establish and oversee the Campus Controlled Substances Program in accordance with federal and state laws, best practices, and this Policy

b. As designated by the Chancellor or National Laboratory Director, the Responsible Official will:

i. Designate one (1) or more individuals, such as the CSPO, to implement and manage the program and ensure that any such designee receives training and/or has experience in California and federal laws governing Controlled Substances;

ii. If authorized through a Power of Attorney, sign all DEA Registrations on behalf of the UC or National Laboratory location of the UC Regents or sign a Power of Attorney to authorize the CSPO or additional individuals to sign such DEA Registrations; and

iii. If authorized through a Power of Attorney, obtain and execute order forms for schedule II Controlled Substances.

c. The authorization by the Responsible Official for other individuals to sign registrations must be further evidenced by a Delegation of Authority.

d. Notwithstanding the foregoing, nothing will restrict the Chancellor or National Laboratory Director from directly assigning to the CSPO the authority to take the actions set forth in section IV(A)(2)(b)(ii-iii) above

through a Power of Attorney, rather than assigning such authority to the Responsible Official.

3. **Controlled Substance Program Officer (CSPO)**

   a. Implement and manage the Campus Controlled Substance Program on a day-to-day basis as the Responsible Official's designee (such as personnel from Environment, Health and Safety).

   b. If delegated the authority through a Power of Attorney, the CSPO may sign registrations and/or obtain and execute order forms as described above in section IV(A)(2)(b)(ii-iii).

   c. The CSPO must receive training and/or have experience in California and Federal laws governing Controlled Substances.

4. **Materiel Management / Procurement**

   a. Procure Controlled Substances, DEA Listed Chemicals, and California Precursor Chemicals for Authorized University Activities in compliance with DEA Registrations, University or National Laboratory policies and procedures, and the location's Controlled Substance Program.

      i. The task of procuring DEA Listed Chemicals, and California Precursor Chemicals for Authorized University Activities may be delegated to department purchasers with approval from the CSPO.

      ii. The task of procuring Controlled Substances must be delegated directly from the Officer of the University through a Power of Attorney.

5. **Authorized Individuals**

   a. Understand their responsibilities within the Campus Controlled Substance Program; and

   b. Comply with federal and state laws and Campus Controlled Substance Program and University or National Laboratory policies and procedures governing the acquisition, use, storage, Transfer, and disposition of Controlled Substances.

V. PROCEDURES

Each UC location is responsible for developing procedures for the Campus Controlled Substance Program that align with this Policy and applicable federal and state regulations.

VI. RELATED INFORMATION

Federal Food, Drug & Cosmetic Act, 21 U.S.C. §§ 301-399i Federal Controlled Substances

Act of 1970, 21 U.S.C. §§801- 971 and implementing regulations at 21 C.F.R. §§1300-1399 (https://uscode.house.gov/view.xhtml?path=/prelim@title21/chapter13/subchapter1&edition=prelim)

DEA's Diversion Control Division's Exempt Chemicals Preparation List (https://www.deadiversion.usdoj.gov/schedules/exempt/exempt_chemlist.pdf)

California Business & Professions Code Division 2, Chapter 9, Article 2 §4021, 4022, 4059, and 4059.5. (https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=BPC&division=2.&title=&part=&chapter=9.&article=2)

California Uniform Controlled Substances Act, Health and Safety Code §11100-11651, and implementing regulations at 11 California Code of Regulations §§800-810.7 (https://leginfo.legislature.ca.gov/faces/codes_displayexpandedbranch.xhtml?tocCode=HSC&division=10.&title=&part=&chapter=&article=)

Research Advisory Panel of California (https://oag.ca.gov/research)

University of California Board of Regents Bylaw 32. Officers of the University (https://regents.universityofcalifornia.edu/governance/bylaws/bl32.html)

U.S. Safe and Drug-Free Schools and Communities Act (20 U.S.C 1145g; 1011i; 34 C.F.R. Part 86) (https://www.govinfo.gov/content/pkg/USCODE-2011-title20/html/USCODE-2011-title20-chap70-subchapIV.htm)

U.S. Drug-Free Workplace Act of 1988 (41 U.S.C. §8101 et seq.) (https://uscode.house.gov/view.xhtml?req=(title:41%20chapter:81%20edition:prelim)%20)

UC guidance on use and possession of marijuana on UC property (https://www.ucop.edu/safety-and-loss-prevention/environmental/program-resources/uc-smoke-free/marijuana-and-drug-policy.html)

University of California Contract and Grant Manual, Chapter 3-600 (Controlled Substances & Drugs and Narcotics (https://www.ucop.edu/research-policy-analysis-coordination/resources-tools/contract-and-grant-manual/chapter3/chapter-3-600.html)

UC Presidential Policy BFB-BUS-43: Purchases of Goods and Services; Supply Chain Management (https://policy.ucop.edu/doc/3220485/BFB-BUS-43)

UC Presidential Policy PPSM-21: Selection and Appointment (https://policy.ucop.edu/doc/4010394/PPSM-21)

VII. FREQUENTLY ASKED QUESTIONS

Not applicable

VIII. REVISION HISTORY

October 9, 2026: This policy was revised to align with recent federal Drug Enforcement Agency (DEA) regulations that changed who can issue a Power of Attorney for signing Forms 222, which are required by the DEA to buy, sell, or Transfer Schedule I and Schedule II Controlled Substances.

December 4, 2025: This Policy was revised to incorporate changes to (1) specifically describe the scope of duties of the CSPO and the Campus Controlled Substances Program; (2) define the Campus Designation form of DEA Registration; (3) provide more specific procedures regarding Powers of Attorney; (4) specifically address requirements applicable to DEA Registrations other than Campus Designation DEA Registrations, such as individual schedule I DEA Registrations; and (5) provide additional guidance as to import, export, interstate and intrastate use, Transfer and transport of Controlled Substances, as well as Controlled Substances Analogues and DEA-exempt chemical preparations.

June 1, 2012: This policy was reformatted into the standard University of California policy template.

IX. APPENDIX

Not applicable.