II USC DEA Registrants are required to maintain accurate usage records and inventories for controlled substances (CS) per terms of their DEA licenses. Inaccurate, incomplete, or missing logs may result in suspension of the license as well as DEA-imposed penalties (see Controlled Substances Act - Control and Enforcement).

**Usage and Inventory of CS for Research**

1. Generate a usage and disposal log for each CS using CS Form B - CS Usage & Disposal Log.
   a. Confirm that the CS has a unique alphanumeric ID.
   b. Complete all fields in the “Information” section of the form.
2. Record each use of a controlled substance.
   a. Record amount used, transferred, and/or disposed of, and remaining balance after each use. NOTE: CS must remain in original containers.
      i. Authorized User name and initial must accompany each entry.
      ii. Physical amount in container must match the usage logs AT ALL TIMES.
      iii. Store CS Usage & Disposal Logs with physical CS inventory.
   b. Refer to the Waste Disposal of Controlled Substances Fact Sheet for details on how to dispose of CS.
3. Document transfer of CS into or out of inventory.
   a. Request approval for transfer from EH&S ehs-cs@usc.edu. Note that CS can only be transferred between two CSUA-approved DEA Registrants.
   b. Once approved, complete CS Form E - Controlled Substances Transfer.
4. Maintain physical inventory forms for all CS.
   a. Complete CS Form C Annual Physical Inventory to document the amount of CS in your possession.
   b. Keep copies of EH&S-approved Controlled Substance Use Authorization (CSUA) application and DEA registration with physical CS inventory.

**Storage**

- Must have two means of locked security [e.g., room with a locked door and locked durable cabinet or locked durable cabinet with a locked safe box].
  a. Schedule I-II drugs must be kept in locked drug safe, vault, or steel cabinet attached to building structure, within a lockable room; may not be stored with Schedule III - V drugs.
  b. Schedule III-V drugs must be kept in a locked, substantially constructed cabinet without wheels.
- Only Authorized Investigators and Authorized Users may have access to CS.

**Notification**

Report the theft or loss of controlled substances immediately.
- Call DPS at 213-740-4321 UPC; 323-442-1200 HSC.
- Notify EH&S immediately at 323-442-2200 or ehs-cs@usc.edu.
- Complete the Controlled Substances Incident Report and submit to ehs-cs@usc.edu.
- A follow-up investigation will be initiated by EH&S.

**References**


§1304.11 Inventory requirements (https://www.deadiversion.usdoj.gov/21cfr/cfr/1304/1304_11.htm)