



Date: August 16, 2013

From: Susan E. Robb, Associate Vice President for Research Administration and Compliance

To: Faculty Researchers

Subject: Notice of New Policy and Requirements for Use of Controlled Substances in Research

The Office of Research has been working closely with the Richmond Office of the U.S. Drug Enforcement Administration (DEA) to bring VCU's controlled substance program into compliance with federal regulations. A new interim policy entitled "Using Controlled Substances for Research" has been approved and can be reviewed at:
<http://www.assurance.vcu.edu/Policy%20Library/Using%20Controlled%20Substances%20for%20Research.pdf>

A Manual (dated August 2013) addressing the updated requirements is available at:
http://www.research.vcu.edu/controlled_substances/cs_manual.pdf

A significant change relates to the ability of the Division of Animal Resources (DAR) to dispense controlled substances to our faculty. In light of the DEA requirements, DAR will not be permitted to dispense substances for researcher use under the Teaching Institution Registration that it holds. DAR will continue to obtain veterinary controlled substances and appropriately transfer them to a DEA Registrant's inventory when necessary.

Individual investigators will now be required to obtain and maintain their own Virginia Board of Pharmacy and DEA Registrations for controlled substance use. Roles and responsibilities, as well as sample forms and other instructions are detailed in the manual referenced above.

Individuals must be listed on and actively involved in the DEA Research Protocol or VCU Controlled Substance Research Protocol to serve as the Registrant (order and dispense substances) for that protocol. Registrants cannot order or dispense substances to other investigators.

VCU must be compliant with our policy on December 31, 2013. It can take two (2) to three (3) months to file for and obtain the VBP and DEA registrations so all affected individuals are encouraged to begin the process soon. When an individual receives their DEA Registration, all controlled substances obtained from DAR should be returned to DAR.

DAR will continue provide substances through December 20, 2013 to allow individuals time to complete the application process.

Questions should be e-mailed to controlsub@vcu.edu.