



LBL Property Management Procedure Controlled Substance Inventory

Owner

Policy – Property Management – Property Manager

Procedure – Property Management – Property Manager

Process – Property Management – Inventory Manager

Overview of the Process:

Property Management conducts a biennial Inventory of Controlled Substances concurrently with the annual physical personal property inventory held during the 2nd quarter of the fiscal year. Principal Investigators are given advance notice of the inventory, held during odd-numbered years in accordance with the Controlled Substances Act of 1970.

Unannounced Inventories of Controlled Substances will occur concurrently with the annual physical personal property inventory during the 2nd quarter of even-numbered years.

Additional inventories are scheduled when there is a transfer of custodianship/stewardship, a termination of employment or a disposal of controlled substances.

Regulations:

- DOE O 580.1 Section 4 Part H Controlled Substances
- LBNL Personal Property Policy Manual Section 6.3 Controlled Substances
 - <http://www.lbl.gov/Workplace/CFO/assets/docs/pro/prty/PropertyManual.pdf>
- Controlled Substance Security Plan
 - <http://www.lbl.gov/ehs/ppls/assets/docs/ControlledSubstanceProtocol.pdf>

Definitions:

- Controlled Substance – a drug which has been declared by federal or state law to be illegal for sale or use, but may be dispensed under a physician's prescription. Such drugs include those classified as narcotics, stimulants, depressants, hallucinogens, and cannabis. The basis for control and regulation is the danger of addiction, abuse, physical and mental harm (including death), the trafficking by illegal means, and the dangers from actions of those who have used the substances.

Roles:

- Principal Investigator (PI)
- Designated Alternate Signer (DAS)
- Controlled Substance Liaison Officer (CSLO) – Procurement
- Property Specialist – Property Management
- Inventory Manager – Property Management
- Laboratory Security
- Business Managers – Divisions/Directorates

Responsibilities:

Principal Investigator (PI)

- *Must be full-time career LBNL employee*
- *Also known as: Registrant, Custodian, Holder (of DEA Reg. #)*
- Provides access to purchase, use and disposal records, and usage log book
- Provides access to controlled substances in "locked repository"
- Is available for inventory, when scheduled by Property Management Specialist



LBNL Property Management Procedure

Controlled Substance Inventory

- For transfers and termination of employment—upon first knowledge, PI contacts Property Management to have controlled substances inventoried
- For disposal, prior to shipment—PI contacts Property Management to have controlled substances inventoried
- PI receives a copy of the Controlled Substance Inventory Report from Property Management Specialist
- Informs their supervisor of inventory results

Designated Alternate Signer (DAS)

- *Back-up or assistant to PI*
- *Must be full-time career LBNL employee*
- DAS Memo on file with Controlled Substance Liaison Officer (CSLO)
 - The DAS is allowed to perform the same functions listed above for the PI

Controlled Substance Liaison Officer (CSLO) – Procurement

- Provides copies of purchase orders (including Schedule numbers) for current fiscal year to Property Management Specialist
- Receives a copy of the Controlled Substance Inventory Report from the Property Manager

Property Specialist – Property Management Core Team

- Schedules and performs Biennial and Unannounced Inventories of Controlled Substances
- Performs Transfer, Termination and Disposal Inventories
- Prepares Controlled Substance Inventory Worksheet, Usage Summary and Memo of Observations
- Maintains appropriate records of inventories for a period of two (2) years

Inventory Manager – Property Management Core Team

- Incorporates results from controlled substance inventories (provided in Controlled Substance Inventory Usage Summary and Memo of Observations) into the consolidated Inventory Final Report
- Submits consolidated Inventory Final Report to Berkeley Site Office (BSO) and distributes copies to Laboratory Security Manager and Business Managers

Laboratory Security

- Security Manager receives a copy of Inventory Final Report from the Inventory Manager
- Security Operations Manager assists with transport of inventoried controlled substances if needed (upon request)

Business Managers – Divisions/Directorates

- Receives a copy of the Inventory Final Report from the Inventory Manager

Inventory Procedure:

Biennial Inventory of Controlled Substances:

- Property Management Specialist will contact the Custodian and/or Designated Alternate Signer (DAS) to schedule the Biennial Inventory of Controlled Substances
 - This scheduling should begin prior to the two year anniversary of the last Biennial Inventory
 - The scheduled Inventory should take place within six months of the Biennial Inventory anniversary date



LBNL Property Management Procedure Controlled Substance Inventory

Unannounced Inventory of Controlled Substances:

- Property Management Specialist is not to provide any advance information about the Unannounced Inventory of Controlled Substances. Two approaches to conducting this inventory are:
 - the option to show up completely unannounced
 - scheduling an "appointment" with the Custodian (or DAS) under the pretext of meeting on another Property Management topic

From this point forward, the procedures for Biennial and Unannounced Inventories are the same

Biennial and Unannounced Inventories of all Controlled Substances must be conducted either as of the start of business or as of the close of business on the inventory date, and start time shall be indicated on the inventory documentation

- A separate inventory shall be made:
 - For each independent activity for which a registration has been secured
 - For each registered location
- In advance, Property Management Specialist prepares a Property Management Inventory of Controlled Substances Worksheet for each controlled substance to be inventoried
- Property Management Specialist meets Custodian (and/or Designated Alternate Signer) at location where their assigned controlled substances are securely stored
- Property Management Specialist verifies that all controlled substances are stored in a locked repository, with access limited to authorized Custodian and Designated Alternate Signer (if applicable)
- Property Management Specialist has the Custodian/DAS perform a count or measure of the controlled substance(s)
 - If the substance is listed in Schedule I or II of the Controlled Substances Security Plan, make an exact count or measure of the contents
 - If the substance is listed in Schedule III, IV or V, make an estimated count or measure of the contents, unless the container holds more than 1,000 tablets or capsules in which case an exact count of the contents must be made
- Property Management Specialist audits usage log book to verify receipts, usage, and on-hand balances
 - Discrepancies are to be reconciled at time of inventory
- Observations and required data are recorded on Property Management Inventory of Controlled Substances Worksheet(s) during course of inventory
- Upon completion of Biennial or Unannounced Inventories, Property Management Specialist completes Property Management Inventory of Controlled Substances Worksheet for each individual inventory
- Property Management Specialist sends copy of completed Property Management Inventory of Controlled Substances Worksheet to the assigned PI/Custodian
- Property Management Specialist then compiles information from all inventories into Controlled Substance Inventory Usage Summary and prepares Memo of Observations
- Property Management Specialist submits Usage Summary and Memo of Observations to the Inventory Manager for review and consolidation into Inventory Final Report
- Inventory Manager consolidates data into Inventory Final Report and submits to Berkeley Site Office (BSO), with copies to Laboratory Security Manager and Division Business Managers
- The record of the inventory must be kept by Property Management for a period of two (2) years
- There is no requirement to submit a report to the Drug Enforcement Agency (DEA)



LBNL Property Management Procedure Controlled Substance Inventory

Additional Controlled Substance Inventories include:

- Transfer of Custodianship and/or Stewardship
- Employee Termination
- Disposal of Controlled Substances

- Prior to actual transfer, termination or disposal, the current Custodian for the controlled substances (or DAS) contacts Property Management Specialist to schedule the inventory
 - Inventory must take place prior to the subject event
 - The more advance notice, the better
 - For disposals, the inventory must take place on the same date the controlled substances are scheduled to be shipped to the authorized disposal vendor
 - The physical inventory of controlled substances process is generally the same as that of a Biennial/Unannounced Inventory
 - See the "From this point forward..." section on previous page for details

Note: These inventories are not incorporated into the annual Inventory Final Report and only distribution of completed Property Management Inventory of Controlled Substances Worksheet to the PI/Custodian occurs

Forms:

Not applicable

Reports:

Title:	Inventory Final Report
Information Displayed:	Spreadsheet with DEA Rec/Lic Holder, custodian, storage location, controlled substance & schedule, beginning balance, receipt, usage, unaccounted for during inventory & ending balance
Purpose of the report:	Results of inventory
Recipient(s):	DOE-BSO, Site Security and CFO Management
Frequency:	End of Inventory