

US EPA ARCHIVE DOCUMENT

Drug Enforcement Administration

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Office of Diversion Control

Mission of the Diversion Control Program

- To prevent the diversion of legitimately produced controlled substances and listed chemicals while ensuring adequate supplies for legitimate needs

Controlled Substances Act (CSA) of 1970

- Provides for a 'closed' system of distribution
- Monitors controlled pharmaceuticals from production to end use, to limit diversion
- Is intended to ensure adequate supply to meet legitimate medical need
- Authority derived from 3 international drug treaties:
 - Single Convention of 1961 (narcotics)
 - Psychotropic Convention of 1971 (psychotropics)
 - UN Convention Against Illicit Traffic in Narcotic Drugs & Psychotropic Substances of 1988 (Article 12 - chemicals)

Three Basic Drug Categories

- Over-the-Counter (OTC)
- Prescription: non-controlled substances
- Prescription: *controlled substances*
 - Drugs having abuse potential
 - DEA is responsible for control

Drug Scheduling Criteria

■ Schedule I

- ❑ High abuse potential
- ❑ No accepted medical use
- ❑ No accepted safe use

I - Heroin, LSD, Marijuana

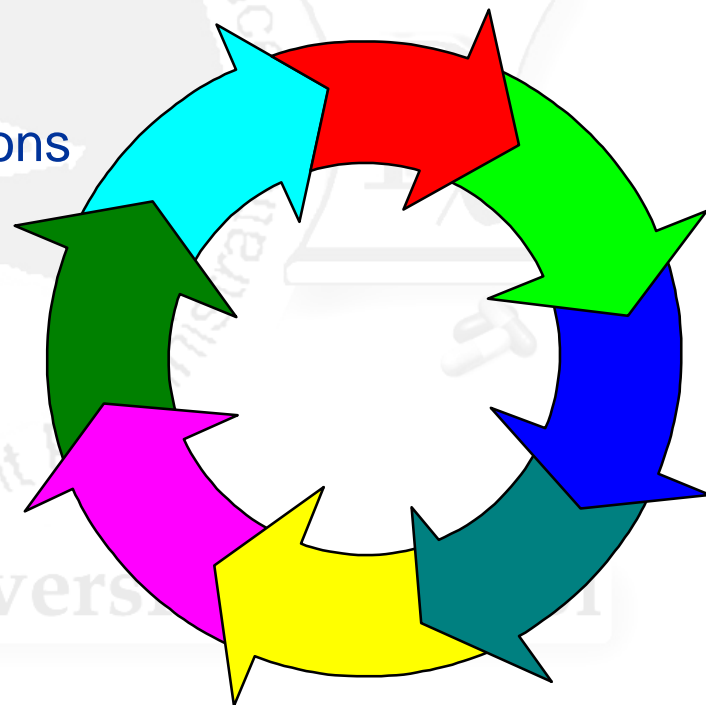
■ Schedule II - V

- ❑ High to low abuse potential
- ❑ Accepted medical use
- ❑ Physical or psychic dependence

II - Dilaudid, morphine,
OxyContin, methylphenidate
III - Tylenol # 3, anabolic steroids
IV - Alprazolam, diazepam,
phentermine
V - Codeine Cough Preparations,
Lomotil

Tracking the Flow of Controlled Substances

- Registration Requirements
 - Type A (physicians, retail pharmacies)
 - Type B (manufacturers, distributors)
 - Chemical handlers
- Record Keeping Requirements
 - Order forms/invoices/prescriptions
 - Theft/loss forms
 - Drug destruction forms
- Inventory Requirements
 - Initial inventory
 - Biennial inventory
 - ARCOS reporting
- Security Requirements

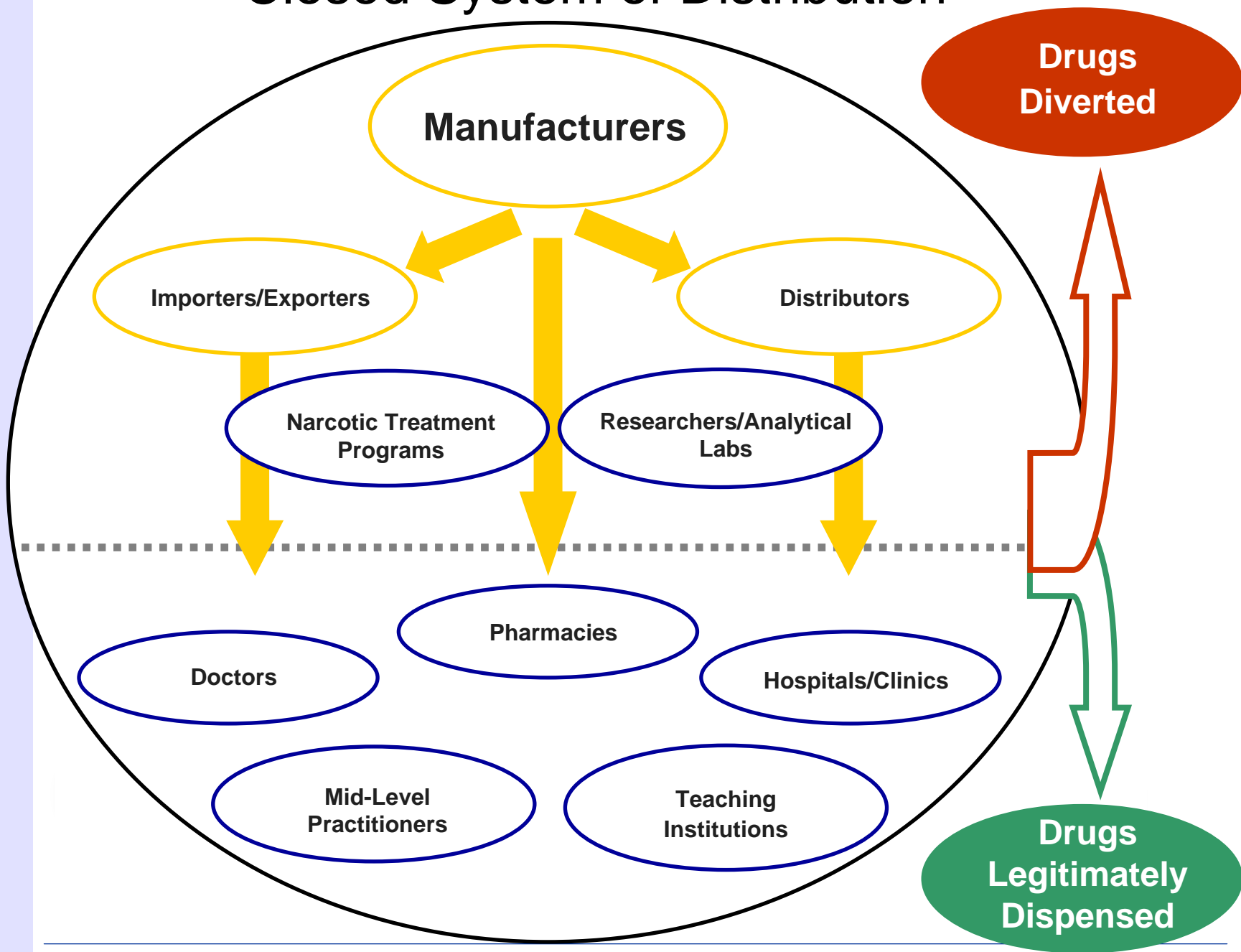


The Closed System

Points of Penetration Within the Closed System

- **Practitioners**
 - Illegal distribution
 - Self abuse
- **Pharmacists**
 - Illegal distribution
 - Self abuse
- **Employee pilferage**
 - Hospitals
 - Practitioners' offices
 - Nursing homes
 - Retail pharmacies
 - Manufacturing/distribution facilities
- **Patients**
 - Individual
 - Organized drug ring

Closed System of Distribution



Registration Facts

- Who Must Register?
 - All handlers of controlled substances in the U.S.
- Many Levels
 - Manufacturer, importer, exporter
 - Distributor, reverse distributor, researcher, analytical lab
 - Narcotic treatment program
 - Hospitals/clinics, retail pharmacies, teaching institutions
 - Practitioners (physicians, dentists, veterinarians)
 - Mid-level practitioners (nurse practitioners, physician assistants, optometrists, animal shelters)

