

Purchasing

The DEA and the University policy have specific procedures to be followed when purchasing controlled substances:

- The Registrant must be aware of all purchases of controlled substances. Provide an initialed and dated copy of the purchase receipt to the Registrant.
- File the purchase receipt with the Location controlled substances records.
- Purchasing controlled substances from centralized sources is highly recommended.

The purchase of C-I and C-II substances requires completion of a DEA Form 222. **After the DEA has approved the use of C-I or C-II controlled substances, they will send the Registrant the DEA Forms 222.**

A. As a general rule, only the minimum amount of controlled substances needed for current research projects should be obtained.

B. Controlled Substances Purchased from University-Based Pharmacies

1. Controlled substances may be purchased and/or acquired through university-based pharmacies (e.g., Colleges of Medicine or Veterinary Medicine). See the Office of Research Compliance [Controlled Substances Web Page](#) for additional information.

2. Registrants are responsible for maintaining the DEA Form 222s for Schedule I or II controlled substances (and recording the use thereof on OSU Controlled Substance Form 6 should they choose).

3. Registrants and authorized agents may obtain controlled substances by providing the following to a university-based pharmacy:

a. An approved university Workday request, which includes the following information:

i. Name of individual picking up (this person must be on the Ohio State University Controlled Substances Authorized Agent List (OSU Controlled Substance Form 3)).

ii. Location (must match location on the list of approved sites).

iii. Item number, quantity, name and estimated price of the controlled substance(s) being purchased.

b. A DEA Form 222 (only required by individual DEA registrants submitting a request for Schedule I/II controlled substances).

c. A copy of the investigator's current DEA research or instructing registration, if applicable.

d. A current university ID.

e. A copy of the Ohio State University Controlled Substances Authorized Agent List (OSU Controlled Substance Form 3). Only those listed on the form or the registrant will be permitted to receive controlled substances.

4. Registrants and authorized agents are responsible for maintaining copies of the university Workday forms or other purchasing records (e.g., 100Ws) used for each controlled substance purchase.

C. Controlled Substances Purchased from Non-University Pharmacies or Distributors

1. Registrants and authorized agents are responsible for obtaining and maintaining the following information for all controlled substances purchased from non-university pharmacies or distributors:

- a. A copy of the invoice, purchase order, or Workday form.
- b. A copy of the shipping document, packing slip, or receipt.
- c. The name, address, and DEA number of the company from which the controlled substance was purchased.
- d. The name of the controlled substance purchased.
- e. The size and strength of the controlled substance purchased.
- f. The amount purchased (which should match the amount received).
- g. For Schedule I/II controlled substances, a copy of the invoice and individual DEA Form 222.
- h. Optional for Schedule I/II controlled substances, a Record of DEA Form 222 Use (OSU Controlled Substance Form 6) to maintain accountability for all DEA Form 222s used. If used, the dates and amounts received entries on this form must match the corresponding entries on the Controlled Substances Record (OSU Controlled Substance Form 1) for each controlled substance purchased.

After initial approval, additional Forms 222 may be requested by the Registrant from the DEA website. For further guidance on this topic, visit the [Using DEA Form 222 to Order Controlled Substances](#) web page.

When controlled substances are shipped to the lab, ensure they are processed as soon as possible, by:

- Recording receipt of substances in the disposition record
- Locking controlled substances in the safe immediately

In addition, ensure that the purchase records meet the DEA regulations by:

- Initialing and dating purchase receipt
- Providing a copy for Registrant's records
- Filing the purchase records with laboratory-controlled substances records

You may purchase controlled substances from internal university sources or from outside distributors like Sigma-Aldrich; Butler Schein, Inc.; Fort Dodge Laboratories; etc. Contact your purchasing department for more information.

Links:

[OSU University Policy – Individual Investigator Use of Controlled Substances in Non-Therapeutic Research](#)
[Controlled Substances Web Page](#)

[OSU Controlled Substance Form 5 – Purchasing & Receiving Log](#)

[OSU Controlled Substance Form 6 – Record of DEA Form 222 Use](#)