



Origination 03/2017  
Approved 09/2022  
Last Revised 06/2019  
Next Review 08/2025

Owner Troy Butcher:  
Pharmacy  
Operations  
Manager  
  
Area Pharmacy -  
Enterprise  
  
Applicability TUKHS- Kansas  
City Division

## Controlled Substance Significant Loss and Reporting

### SCOPE

This policy applies to all employees within The University of Kansas Health System.

### PURPOSE

The purpose of this policy is to identify when the DEA is to be notified of a theft or significant loss of a controlled substance.

### DEFINITIONS

**BNDD** - Bureau of Narcotics and Dangerous Drugs

**Controlled Substance:** A controlled substance is defined as a drug or chemical whose manufacture, possession, or use is regulated by the Drug Enforcement Agency.

**DEA:** Drug Enforcement Administration

### POLICY

When a significant loss or theft of any controlled substance occurs, the site will report the discrepancy to the individual responsible for the pharmacy department or service, the Executive Director of Pharmacy Services and the Risk Management team.

Upon the discovery of such loss the hospital shall notify the Drug Enforcement Administration via online submission of DEA Form #106 within one business day (21 CFR 1301.76(b)).

A significant loss of a controlled substance is defined as a single transactional negative discrepancy when theft is ruled out and the quantity exceeds, or is equal to:

- A. 30 oral tablets/ capsules/ unit dose liquids
- B. 5 patches
- C. 100 mLs of an oral liquid
- D. 5 suppositories
- E. 2 topical dosage forms
- F. 5 vials / syringes / ampules (less than or equal to 10mL each)
- G. 2 vials / syringes / ampules (larger than 10mL each)
- H. 1 Patient-Controlled Analgesia (PCA) syringe
- I. 1 Intravenous (IV) bag

**Any identified theft of a controlled substance must be reported to the DEA via Form #106**

The leader or supervisor responsible for the impacted pharmacy license(s) may elect to initiate an internal investigation or report loss to the DEA if they believe a loss is significant given their specific site or work flow, even if said loss does not exceed thresholds specified above.

If the loss or theft occurs within the state of Kansas, the Pharmacist-In-Charge (PIC) must notify the Kansas Board of Pharmacy in writing within one day of discovery.

If the loss or theft occurs within the state of Missouri, the PIC must notify the Bureau of Narcotics and Dangerous Drugs (BNDD) via the attached BNDD Reporting Form within 7 days of discovery.

## REFERENCES

19 CSR 30-1.034(2)(B)

21 CFR 1301.76(b)

KAR 68-20-15b

MM.01.01.03 EP 5

## SUPPORTING DOCUMENTS

[DEA's List of Controlled Substances](#)

[DEA Form #106](#)

[BNDD Reporting Form](#)

# REVIEWED/APPROVED BY

Pharmacy Compliance Readiness Committee (February 2017)

Pharmacy Ambulatory Leadership Committee (March 2017)

**Note: The University of Kansas Health System policies are maintained electronically and are subject to change. Printed copies may not reflect the current official policy.**

## Approval Signatures

Step Description	Approver	Date
	Jennifer Palmer: Health System Policy Administrator	09/2022
	Christopher Bell: Director, System Inpatient Pharmacy Operations	09/2022
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## Applicability

The Univ of Kansas Hospital, The Univ of Kansas Hospital - Ambulatory Clinics, The Univ of Kansas Hospital - Home Infusion, The Univ of Kansas Hospital - Marillac Campus, The Univ of Kansas Hospital - Specialty Surgery, The Univ of Kansas Hospital - Strawberry Hill, The Univ of Kansas Hospital- Indian Creek Campus