

Report Theft/Significant Loss of Controlled Substances

The following procedure outlines the notification requirements for the **controlled substance licensee/registrant** in the event of theft or significant loss. It also gives some guidance for determining if a single loss or a series of losses is significant. See the blue box below for contact information and links to online forms referenced in the procedure steps.

Immediately upon discovery:

1. Notify the **U-M Department of Public Safety** (UMDPS). UMDPS will take a report and conduct an investigation.
2. Obtain the following information from UMDPS
 - a. Report number
 - b. Investigating officer's name
 - c. Officer's phone number
3. Notify the **UMOR Controlled Substance Monitors**.
 - The CS Monitors assist the licensee/registrant throughout the reporting and investigation process.

If after normal business hours, or if Controlled Substance Monitors cannot be reached by phone, Monitors can be paged at **(734) 936-6266, Pager number 31685**.

Within one business day of discovery:

1. Fax the following information in a written memo to the **DEA Detroit Field Office**:
 - a. The specific controlled substances involved, including specific amounts lost or diverted.
 - b. Indication as to whether the loss or theft can be associated with specific individuals, or whether the loss or theft can be attributed to unique activities that may take place involving the controlled substances

Contact Information

U-M Public Safety:

- Phone: (734) 763-1131 (non-emergency)

UMOR Controlled Substance Monitors:

- Phone: (734) 764-2003 (Kelli), or (734) 615-3872 (Lou)
- Email: cs-monitors@med.umich.edu
- Pager: (734) 936-6266, Pager #31685

DEA Detroit Office-Diversion

- General Fax (313) 226-7545
- Phone: (313) 226-7537

State of Michigan:

- Email bplhelp@michigan.gov

- c. Indicate any pattern of losses over a specific time period (whether they appear random or are the result of efforts taken to resolve the losses).
2. Complete and submit the online DEA Form-106. Print a copy for your records.
3. Email a written report and a copy of the completed DEA Form-106 to the **State of Michigan Licensing and Regulatory Affairs (LARA)** at bplhelp@michigan.gov.

Best Practices (document vs. report)

“Significant loss” is a subjective term, not defined by the federal Controlled Substance Act. Consider the following when determining whether to report a loss:

- The quantity of loss in relation to business type (actions: document non-significant loss, report significant loss)
- Is the loss associated with theft? (action: report)
- Is the loss waste during use of the substance in the laboratory? (action: document)
- Are there patterns of loss over time? (action: report)
- Does this substance have a high potential for diversion or theft? (action: report)

 Non-significant loss caused by miscounts or clerical errors must still be documented on the usage logs and must be recorded on the DEA Form-106. File the DEA Form-106 with the controlled substance records for a minimum of two years. Do not send to the DEA.