

June 23, 2011

MOLLY THEODOSSEYPolicy Coordinator
Office of the Provost**Re: Request for Consultation: Proposed Amendment to PPM 290-70: Controlled Substances**

The Davis Division of the Academic Senate forwarded the subject request for consultation for review by standing committees and the Chairs of Faculty Executive Committees in each college and professional school. Responses were received from Committee on Planning and Budget, Committee on Elections Rules and Jurisdiction, Committee on Research: Policy and Grants Subcommittees and the Faculty Executive Committee from the College of Letters and Sciences. Given the authority designated to the Committee on Research: Policy Subcommittee the subcommittee's response, below, serves as the Davis Division response:

"The Committee on Research Policy Sub-committee has had an opportunity to review the July 8, 2009 UC Davis Policy and Procedure Manual (PPM), Chapter 290, Section 70 dealing with Controlled Substances and to provide input for the revised draft dated May 13, 2011. This revision was done in response for compliance to the UCOP Business and Finance Bulletin 50 and DEA regulations. Major changes include a Faculty Screening Program and Staff background checks. Minor revisions have been made to clarify a number of procedural issues in order to establish a chain of responsibility as well as procedures for training, monitoring and controlling the use of those substances.

Generally the revision has added the new requirements, organized the document in a manner that is easier to follow and has generally been streamlined. This makes the policy easier to understand by a first time reader and applicant who may use controlled substances. In the process of revision, however, some materials have been removed from the 2009 document which makes it more difficult to understand. A number of the definitions (II. Definitions, page 1) have been removed for which abbreviations are still used. It is assumed that either these are included in other places of the PPM or are commonly known. That may or may not be the case. For example, DEA, IND, IRB, RAPC, and dangerous drug were defined in the 2009 document but not the 2011 one. The committee believes those should be added back to the document for clarity.

The section on Import, Export, Interstate and Intrastate Use (Procedures VI. L) has been extensively modified to give the reader the impression that one simply contacts the Program Administrator for issues of import or export. One may call the Administrator about any issue dealing with controlled substances; this section does not indicate the gravity of the problem if one fails to do so. The 2009 wording, however, gives the essence of the law and its requirements which has not been included in the revision. The committee recommends adding the statement, "Transport of controlled substances off campus is highly regulated. Contact the program administrator for specific instructions on transportation requirements."

Other than the above suggestions the Committee on Research Policy is supportive of the revised draft of 290-70."

Sincerely,



Robert Powell, Chair
Davis Division of the Academic Senate
Chair & Professor: Chemical Engineering & Materials Science
Professor: Food Science & Technology