



Davis Division Academic Senate

Request for Consultation Responses

PPM 290-70, Controlled Substances Review

June 16, 2011

The policy has undergone significant revision to maintain compliance with systemwide policy; definitions added to provide clear understanding and guidance; responsibilities section rewritten to provide clear guidance to all employees involved with controlled substances; minor revisions to the procurement section; training program requirements changed to include all individuals who have access or use controlled substances; requirement to implement a Faculty Screening Program has been added to the policy; requirement for staff background checks has been added to the policy; minor revisions to the storage and use section; minor revisions to the biennial inventory section; minor revisions to the disposal section; requirements for imports, exports, intrastate and Intrastate use of controlled substances added; procedure for terminating use of controlled substances added; procedure for reporting an illicit activity added; requirements for research involving human subjects and controlled substances added; requirement for auditing and monitoring of the controlled substance storage sites has added.

Administrative Partners (DANN TRASK)

June 15, 2011 6:37 PM

No response at this time.

Elections, Rules & Jurisdiction

May 31, 2011 2:38 PM

No response at this time.

Planning & Budget

June 6, 2011 3:12 PM

No response at this time.

Research - Grants

May 31, 2011 2:38 PM

No response at this time.

Research - Policy

June 16, 2011 1:42 PM

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.