FREQUENTLY ASKED QUESTIONS: Reverse Distribution
Information for Researchers Leaving Emory University

1. What are Controlled Substances?
Controlled Substances are DEA regulated drugs for which there is a potential for abuse/addiction. Controlled Substances are divided into Schedules I - V depending on their medicinal value and potential for abuse. Schedule I Controlled Substances are considered to have no medicinal value and high potential for abuse. Schedule II Controlled Substances have medicinal value but high potential for abuse. Schedule III – V Controlled Substances have medicinal value and lesser potential for abuse. A list of Controlled Substances can be found here.

2. What are my obligations regarding Controlled Substances when I leave Emory University?
The registrant is responsible for proper disposal of Controlled Substances before leaving Emory University. The registrant can establish an account with an approved reverse distributor to accept and dispose Controlled Substances.

3. What is the reverse distribution process?
A reverse distributor is a person who receives Controlled Substances acquired from another DEA registrant for returning unwanted, unusable, or outdated Controlled Substances to the manufacturer or the manufacturer's agent, or, where necessary, processing such substances or arranging for processing such substances for disposal. Generally, labs at Emory use The Rx Exchange to return Controlled Substances. For step-by-step instructions, click here and follow the directions that correspond with the drug schedule(s) of the Controlled Substances you wish to return. After completing the reverse distributor process, any records evidencing the disposition of the drugs should be kept for 3 years from the date of final disposition. Records related to schedule I and II drugs should be kept separate from the records of schedule III-V drugs.

4. Who can I contact for assistance with the reverse distributor process?
If you need assistance with the reverse distributor process contact the Office of Compliance at (404) 727 2398 or compliance@emory.edu.
5. **I am leaving Emory, why should I worry about what happens to any Controlled Substances I leave behind?**

Failure to follow Emory University policy on properly disposing Controlled Substances may result in referral for prosecution. The DEA may view the failure to properly dispose of Controlled Substances and Dangerous Drugs as evidence of diversion and a criminal offense.

6. **Can the lab I leave behind continue using my Controlled Substances for research when I am gone?**

Generally, researchers must use the Controlled Substances they order exclusively for their own research. However, when the registrant leaves Emory University and is transferring substances to another person who is taking over the work and the transferee has appropriate registrations, transfers may be permitted. The Georgia Board of Pharmacy requires a new application when there is a change in the primary person in charge of research (See “PIC Change Request form” under the Applications and Forms page on the Georgia Board of Pharmacy website).

7. **What are Dangerous Drugs?**

Under Georgia law, “Dangerous Drugs” are drugs that are available only by prescription from a licensed health care professional or the purchase of which is restricted to licensed health care professionals. Dangerous Drugs do not include prescription drugs that are “Controlled Substances.” Dangerous Drugs also do not include over-the-counter drugs (including certain lower dose forms of drugs that would be considered prescription drugs if they were in higher dose forms). [Here](#) is a link to a list of drugs the state of Georgia deems “Dangerous Drugs.”

8. **What should I do with Dangerous Drugs if I am leaving Emory University?**

Dangerous Drugs may be disposed through the Emory University Environmental Health and Safety Office (EHSO). Contact EHSO at [http://www.ehso.emory.edu/](http://www.ehso.emory.edu/) and go to “Waste Collection.” Complete the required information and a representative from EHSO will remove and properly dispose of the drug.