

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:
 - Report number
 - Investigating officer's name
 - 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, use the [U-M Compliance Hotline](#) to speak to a specialist or file an online report.

Within one (1) business day of discovery:

1. Fax the following information in a written memo to the **DEA Detroit Field Office**:
 - The specific controlled substances involved, including specific amounts lost or diverted
 - 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
 - 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 completed copy for your records.
3. Call the **State of Michigan Bureau of Health Professions** to report the theft or loss.
4. Fax a copy of the completed DEA Form 106 to the State of Michigan.

Contact Information

U-M Public Safety:

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

UMOR Controlled Substance Monitors:

- Phone: (734) 764-2003 or
(734) 764-2004
- Email: CS-monitors@med.umich.edu

DEA Detroit Office–Diversion:

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

[DEA procedures and more information](#)

[DEA Form 106](#) – Report of Theft/ Loss


State of Michigan:

- Phone: (517) 373-1737
- Fax: (517) 373-4886
- Email: bhpinfo@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)
- Whether the loss is associated with theft (action: report)
- Whether the loss is waste during use of the substance in laboratory (action: document)
- Pattern of losses over time (action: report)
- The substance’s 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 (2) years. Do not send to the DEA.