

CONTROLLED SUBSTANCES MONITORING PROGRAM

# **Escalation Plan**

Registrant will be placed into one of the following categories at the discretion of the CS Monitor:

**Green Tier** 

Action to be taken: A formal notice (letter) is sent from the CSRRC Chair, plus cc to Department Chair, congratulating the registrant on fully meeting the state and DEA regulations.

## **Yellow Tier**

## Actions to be taken:

- 1. Registrant *may* receive more guidance and MV's, at the discretion of the CS Monitors.
- 2. A formal notice (letter) is sent from the CSRRC Chair stating expectations and timeframe for corrections. If corrections are not made as expected, registrant may be placed in the orange tier.

## **Orange Tier**

## Actions to be taken:

- 1. Registrant will be placed on a one-year probationary period, to include additional guidance and MV's.
  - A. The CSRRC may request unannounced MV's during the probationary period.
- 2. Registrant will receive a formal notice (letter) from the CSRRC Chair stating expectations and timeframe for correction, plus cc of formal notice to Department Chair and Associate Dean. CSRRC to review at meeting.
- 3. Associated staff and the registrant must complete additional training.

# **Red Tier**

# Actions to be taken:

- 1. All of the above from orange tier, plus
- 2. The CSRRC may recommend any of the following to the U-M Medical School (UMMS) Dean and/or the U-M Vice President for Research:
  - A. A staff members' authorization to use controlled substances is revoked (e.g., no longer listed on the authorized personnel log) either for a limited duration or indefinitely.
  - B. The registrant is prohibited from using controlled substances for research at U-M, either for a limited duration or indefinitely. If the registrant is conducting animal research, the IACUC will be notified due to veterinary considerations.
  - C. The registrant and any associated staff must come before the CSRRC to explain their continued controlled substance non-compliance.



If controlled substance use is allowed to continue, the registrant is placed on a detailed probationary period, to be communicated by the U-M Assistant Vice President for Research. The UMMS Dean and/or U-M Vice President for Research, CSRRC Chair, and registrant Department Chair are included in the notification.