

DEA Controlled Substance Self-Audit Checklist

The 39 things a DEA investigator checks in a veterinary practice — a print-and-walk worksheet.

An unannounced DEA inspection is unsettling for one reason: you can't see it coming. This worksheet takes that away. It lets you run the inspection yourself — first, quietly, on your own schedule, with nothing on the line.

How to use it

Walk your practice with this in hand. For each of the 39 items, tick **Yes**, **No**, or **Partial** — and answer honestly, because every gap you find here is one an inspector won't. Use the **Notes** column to write down what needs doing.

When you're done, count every No and every Partial — that is your compliance-gap total: _____ of 39. Find that number on the scale below.

INSPECTION-READY

0–2 gaps. Strong — maintain and keep documenting.

MINOR GAPS

3–7 gaps. Close the open items before an inspection.

SIGNIFICANT EXPOSURE

8–19 gaps. A DEA inspection today would likely cite you.

HIGH RISK

20+ gaps. Major violations are likely — act now.

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Vet Compliance HQ

#	INSPECTION ITEM	YES	NO	PARTIAL	NOTES
A · DEA REGISTRATION & PRACTITIONER STATUS <small>Basis: 21 CFR Part 1301</small>					
1	The practice holds a current, unexpired DEA registration.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2	The DEA registration certificate is kept on file and available for inspection.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3	The registration shows the exact name and physical address where controlled substances are stored and used.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4	The registration covers every controlled-substance schedule (II–V) the practice actually handles.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5	Every location where controlled substances are stored has its own DEA registration.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B · STORAGE & PHYSICAL SECURITY <small>Basis: 21 CFR 1301.75</small>					
6	All controlled substances are stored in a securely locked, substantially constructed cabinet or safe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7	The controlled-substance cabinet is kept locked at all times except when a staff member is actively accessing it.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8	Only the minimum necessary quantity of controlled substances is kept on hand, to limit diversion risk.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9	Controlled substances are never left unattended during the day (exam rooms, crash carts, unlocked drawers).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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10	The storage area cannot be reached by clients or unauthorized visitors without supervision.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
11	Keys, combinations, and access codes are controlled, and combinations change when a staff member with access leaves.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
C · RECORDKEEPING & CONTROLLED SUBSTANCE LOGS Basis: 21 CFR Part 1304					
12	A controlled-substance log is kept for every opened container and updated immediately after each use.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
13	Each entry records date, patient, amount administered, dispensed, and wasted, the running balance, and the person responsible.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
14	The log balance is reconciled against the physical count, and discrepancies are investigated and documented.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
15	Wasted controlled substances are recorded and witnessed by a second authorized person.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
16	Schedule II records are kept physically separate from all other records (Schedule III–V may be separate or readily retrievable).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
17	All controlled-substance records are kept at the registered location for at least two years (longer where the state requires).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
D · BIENNIAL INVENTORY Basis: 21 CFR 1304.11					
18	An initial inventory of all controlled substances was taken when the practice first registered with the DEA.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
19	A complete inventory of all controlled substances is taken at least every two years.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
20	Each inventory is signed and dated, and notes whether it was taken at the opening or close of business.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
21	Completed inventory records are kept on file for at least two years.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
E · ORDERING & RECEIVING Basis: 21 CFR Part 1305					
22	Schedule II substances are ordered only on a DEA Form 222 or through CSOS.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
23	A current power of attorney is on file for everyone authorized to order on the registrant's behalf.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

#	INSPECTION ITEM	YES	NO	PARTIAL	NOTES
24	Invoices and receipts for all controlled-substance purchases are kept with the records.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
25	Incoming shipments are checked against the invoice and entered into the log the day they arrive.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
F · PERSONNEL & ACCESS CONTROL Basis: 21 CFR 1301.76 / 1301.90					
26	Access to controlled substances is limited to the minimum number of specifically authorized staff.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
27	No employee with access has a controlled-substance felony conviction or a DEA registration denied, revoked, or surrendered for cause.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
28	Staff are screened before being given access to controlled substances.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
29	Staff who handle controlled substances are trained on handling, logging, and security, and the training is documented.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
30	A written, current record identifies who is authorized to access controlled substances.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G · DISPOSAL OF EXPIRED / UNWANTED CONTROLLED SUBSTANCES Basis: 21 CFR Part 1317					
31	Expired or unusable controlled substances are separated from working stock and clearly marked.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
32	Expired or unwanted controlled substances stay recorded in the log until they are disposed of.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
33	Disposal uses a DEA-authorized method (reverse distributor, return to supplier, or other authorized route) — never flushing or the trash.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
34	Disposal and destruction are documented, and the records are kept on file.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
H · THEFT, LOSS & DIVERSION RESPONSE Basis: 21 CFR 1301.76					
35	The practice knows it must notify the DEA in writing within one business day of discovering a theft or significant loss.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
36	The practice knows a DEA Form 106 must be filed within 45 days of discovering a theft or significant loss.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
37	Staff know to file a police report for any theft of controlled substances.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

#	INSPECTION ITEM	YES	NO	PARTIAL	NOTES
38	There is a written procedure for responding to suspected drug diversion by a staff member.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
39	Controlled-substance use is reviewed periodically for patterns that could signal diversion.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

You've found your gaps. Here's what to do with them.

Finding gaps isn't failing the audit — it's the whole point of running one. Every gap you caught on paper is one a DEA investigator won't catch in person. Close them in this order:

1. **Start with the No's.** Each one is an open gap with no procedure behind it — and these are what an inspection cites first.
2. **Don't wave off the Partial's.** "We sort of do this" is not a defense. A partial practice is an inconsistent one, and inconsistency is what gets found.
3. **Fix the systemic gaps first.** Storage, recordkeeping, and staff training are where DEA findings cluster — and where a real system protects you most.
4. **Write it down.** A practice that can show written procedures and trained, signed-off staff stays defensible even when a person slips. An undocumented practice carries the whole violation itself.

Free guides that walk the fixes

Wherever this checklist found a gap, there's a free, plain-English guide on our site that explains the rule and how to meet it:

- **Recordkeeping & logs** — Veterinary Controlled Substance Log
vetcompliancehq.com/guides/veterinary-controlled-substance-log
- **Storage & security** — Controlled Substance Storage & Security Requirements
vetcompliancehq.com/guides/controlled-substance-storage-requirements-veterinary
- **Biennial inventory** — Biennial Inventory Requirements for Controlled Substances
vetcompliancehq.com/guides/biennial-inventory-veterinary-controlled-substances
- **Theft, loss & diversion** — Drug Diversion in Veterinary Practices: Prevention & Response
vetcompliancehq.com/guides/drug-diversion-veterinary-practices
- **Records retention** — How Long to Keep Controlled Substance Records
vetcompliancehq.com/guides/how-long-keep-controlled-substance-records
- **The full picture** — DEA Inspection Checklist for Veterinary Practices
vetcompliancehq.com/guides/dea-inspection-checklist-veterinary

All ten guides are at vetcompliancehq.com/guides — free, no sign-up.

A checklist shows the problem. It doesn't fix it.

The Vet Compliance HQ DEA Compliance System is the complete set — about 15 written SOPs, a staff-training pack with signed acknowledgment forms, and a drug-diversion response plan: everything that turns the gaps above into a documented, defensible system. See it at vetcompliancehq.com.

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