

April 16, 1973

TO: Leonard E. Meiselas, M.D.

FROM: Max Fink, M.D.

SUBJECT: Control of drugs on campus - memorandum 2/26/73
from the University Counsel

In response to this memorandum, I have discussed the new regulations with representatives of the Narcotic Control Bureau of the Department of Health of New York.

Present regulations are being interpreted that individuals and individual laboratories are to be licensed, rather than institutions, excepting hospital pharmacies.

In addition to complying with New York State regulations, applications must also be made to the Bureau of Narcotics and Dangerous Drugs. The proper sequence for a scientist is to make application and obtain approval from the New York State Department of Health, and based on this approval, apply to the Bureau of Narcotics and Dangerous Drugs. (Depending on the project, separate additional applications are ordinarily made to NIMH, FDA and other agencies which actually supply controlled substances).

Because of the complex nature of the regulations, it would be advisable for the Health Sciences Center to appoint an officer with the responsibility to: (1) maintain a file of pertinent regulations; (2) advise members of the Health Sciences Center professional staff in matters of compliance; (3) maintain records of approved applications within the Health Sciences Center; and (4) coordinate the use of facilities specifically necessary for the control of these substances. Such an officer should notify periodically (annually?) the Vice President for Health Sciences of the status of applications and the use of controlled substances in the institution.

The concept of a single application from a single office for research in controlled substances is not feasible at this time.

MF/1j