



# DEA Form 222 (Schedule I & II Transfers)

## Documentation Requirements for Controlled Substance Transfers to a Reverse Distributor

**DEA Form 222** is required for the transfer or disposal of **Schedule I and II controlled substances**. The form ensures accountability and traceability throughout the chain of custody and is one of the most commonly reviewed documents during a DEA audit.



by William Doxey



# When to Use DEA Form 222 and Required Details

## When to Use DEA Form 222

- Whenever your facility transfers **Schedule II substances** to a **DEA-registered reverse distributor**
- When purchasing Schedule I or II substances from a registered supplier
- During intra-company transfers between DEA-registered facilities

## Required Form Details

Each DEA Form 222 must include the following information to be considered valid:

- **Correct registrant information** for both the supplier (or reverse distributor) and the requester
  - DEA numbers
  - Facility names and addresses
- **Drug name, strength, and dosage form**
- **National Drug Code (NDC)**, if available
- **Quantity of each drug being transferred**
- **Date the order is signed**
- **Date of shipment or receipt**

For **paper triplicate forms**, the original and second copy go to the supplier or reverse distributor, and the third copy is retained by the requesting facility.

For **electronic orders** (via the Controlled Substance Ordering System, or CSOS), digital records must be **validated and digitally signed**, and follow the same retention rules.

### Retention and Filing Requirements

- Paper Form 222s and CSOS digital records must be **retained for a minimum of 2 years** from the transaction date
- Records must be **readily retrievable** and available for inspection by the DEA
- A well-maintained log of Form 222 transactions should be kept in chronological order, cross-referenced with the facility's controlled substance inventory and disposal records

### Avoid These Common Mistakes

- Using Form 222 for Schedule III–V substances (not required)
- Forgetting to retain the third copy (paper) or digital CSOS confirmation
- Omitting the shipment date or leaving fields blank
- Failing to confirm receipt of drugs by the reverse distributor



# Best Practices for DEA Form 222 Compliance



**Designate a single compliance officer or pharmacist-in-charge to oversee all Form 222 transactions**



**Use bound logs or secure digital systems to organize forms**



**Reconcile Form 222 transactions monthly against reverse distributor CODs and internal inventory logs**



**Train staff annually on how to complete and review DEA Form 222 correctly**

**Need help managing DEA Form 222 compliance?** Easy Rx Cycle offers full support for DEA form completion, secure pickups, and recordkeeping guidance tailored to your operation.

👉 Contact us or call 501-904-2929 to streamline your reverse distribution process.