



DEA Form 41 (Destruction Documentation)

Required Recordkeeping for the Destruction of Controlled Substances



by **William Doxey**



Understanding DEA Form 41

DEA Form 41 is used to document the **destruction of Schedule I–V controlled substances**. It ensures full accountability for drugs that are no longer usable due to expiration, contamination, damage, or returns. Whether destruction is done on-site or via a reverse distributor, Form 41 is a key part of the compliance record.

When to Use DEA Form 41

- When a DEA registrant directly destroys controlled substances (on-site)
- When substances are rendered non-retrievable through incineration, chemical digestion, or other DEA-approved methods
- When documenting drugs witnessed during destruction by an authorized reverse distributor (some states still require a Form 41 to accompany the Certificate of Destruction)

Note: DEA Form 41 is **not** used when transferring Schedule II substances to a reverse distributor—that requires DEA Form 222. However, the reverse distributor may file Form 41 after destruction and provide your facility with a **Certificate of Destruction (COD)**.

What to Include on DEA Form 41

Each completed form should include:

- **Name and quantity** of each controlled substance being destroyed
- **Dosage form** and strength (e.g., tablets, vials, injectables)
- **National Drug Code (NDC)** if available
- **Date of destruction**
- **Method of destruction** (e.g., incineration, chemical digestion, secure disposal via reverse distributor)
- **Names and signatures of two authorized witnesses** (required by the DEA)
- Registrant's DEA number and address of the destruction site



Submission Requirements and Best Practices

Submission & Retention Requirements

If destruction is performed by the registrant:

- DEA Form 41 must be **submitted to the local DEA office** at least **14 days prior** to the planned destruction date (some jurisdictions require longer notice).
- DEA may choose to send a representative to witness destruction or approve the use of two internal witnesses.

If destruction is done by a reverse distributor:

- The reverse distributor is responsible for submitting Form 41 to the DEA.
- Your facility should receive and **retain a Certificate of Destruction (COD)**.
- The COD and destruction log must be kept for **at least 2 years**.

Best Practices for DEA Form 41 Compliance

- Always ensure **two authorized employees** or one employee and one law enforcement officer are present for on-site destruction
- Cross-reference the drugs listed on DEA Form 41 with your inventory and waste logs
- File Form 41 copies chronologically and alongside CODs
- Use a standardized log template to record every destruction event—especially if you perform more than one per year

Common Mistakes to Avoid

- Forgetting to include drug strength or dosage form
- Not listing destruction method in sufficient detail
- Missing or illegible witness signatures
- Failing to retain CODs from reverse distributors
- Submitting the form after destruction instead of prior notice (when self-destroying)

Why It Matters

DEA Form 41 is a critical part of your facility's **controlled substance disposal record**. It ensures transparency, regulatory compliance, and legal protection in the event of an audit or investigation.

Non-compliance with destruction documentation can lead to:

- DEA warnings or monetary fines
- Failed inspections
- Suspended registration for improper disposal practices

Need help with DEA Form 41 procedures or audits? Easy Rx Cycle can guide you through proper documentation, ensure your destruction workflow is compliant, and help you manage CODs and reverse distributor coordination.

👉 Contact our [compliance team](#) or call 501-904-2929 for help.