

Drug Enforcement Administration  
Diversion Control Division  
Guidance Document

**Title:** Date of Receipt of Sealed Inner Liners by Reverse Distributors

**Summary:** This guidance document addresses when a Drug Enforcement Administration (DEA)-registered reverse distributor is considered to have received a sealed inner liner from either DEA registrants authorized as collectors or Federal, State, tribal, or local law enforcement agencies.

**Activity:** Receipt of Sealed Inner Liners by Reverse Distributors

**To Whom It Applies:** DEA-registered reverse distributors.

**Question:** When is a DEA-registered reverse distributor considered to have received a sealed inner liner either from a DEA registrant authorized as a collector or a Federal, State, tribal, or local law enforcement agency (law enforcement)?

**Answer:** In accordance with [21 CFR 1317.15](#), [21 CFR 1317.55](#), and [21 CFR 1304.21\(d\)](#), a reverse distributor acquires controlled substances (including sealed inner liners) when it picks up the controlled substances from a registrant at the registrant's registered location or authorized collection site or from law enforcement, or when it receives the controlled substances delivered by common or contract carrier or delivered directly by a non-practitioner registrant or law enforcement.

Additionally, [21 CFR 1317.15\(d\)](#) states, "A reverse distributor shall destroy or cause the destruction of any controlled substance received for the purpose of destruction no later than 30 calendar days after receipt." See [21 CFR 1317.05\(c\)\(2\)\(iv\)-\(v\)](#) regarding authorized methods of sealed inner liner destruction. DEA reverse distributors are also reminded of their record keeping obligations with respect to sealed inner liners. See [21 CFR 1304.22\(e\)\(4\)-\(5\)](#).

The contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law, regulations, or Department of Justice policies.

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