

June 17, 2020

Melody Braswell
Department Clearance Officer
United States Department of Justice
Justice Management Division, Policy and Planning Staff
Two Constitution Square, 145 N Street NE, Suite 3E.405B
Washington, DC 20530

RE: Inmar Comments on DEA Notice: Agency Information Collection Activities; Proposed eCollection, eComments Requested; Revision of a Previously Approved Collection Report of Theft or Loss of Controlled Substance DEA Form 106, OMB Number 1117-0001.

Dear Ms. Braswell:

Inmar appreciates this opportunity to provide comments to the Drug Enforcement Administration (DEA) regarding the notice to revise the currently approved collection information of the DEA Form 106. As a Reverse Distributor, Inmar accepts controlled substances from its various clients across the United States and, on average, receives over 500,000 ARCOS-reportable controlled substances on a monthly basis.

Inmar understands that DEA will be submitting revisions to the DEA Form 106 information collection to the Office of Management and Budget (OMB) for review and approval in accordance with the Paperwork Reduction Act of 1995 and wishes to provide the following comments for your review and consideration.

COMMENTS

1. Chemical and Drug Theft/Loss Report Details, Number of Thefts and Losses in the past 24 months*

Inmar suggests that this field be removed as it has no practical utility for the proper performance of the functions of the agency. Further, Inmar believes that the removal of this field would minimize the burden of the collection of information on those who are to respond.

The information collected from this field can easily be obtained by aggregating the data collected. Additionally, collection in this manner requires the responder to keep track of the number of theft/loss reports for a rolling 24 months, creating additional burden on the responder and subjecting the responder to unnecessary risk of error.

2. Chemical and Drug Theft/Loss Report Details (Employee Theft (or Suspected), Customer Theft (or Non Employee), Loss in Transit), Pharmaceuticals or Merchandise Taken?

Inmar suggests that this field be removed from the listed Theft/Loss types as it has no practical utility for the proper performance of the functions of the agency related specifically to Losses in Transit.

This question is not relevant to Employee Theft (or Suspected), Customer Theft (or Non Employee) or Loss in Transit scenarios as the response will always be to the affirmative.

3. Chemical and Drug Theft/Loss Report Details (Hijacking of Transport Vehicle/Loss in Transit), Telephone Number of Common Carrier

Inmar suggests that this field be removed, and believes that this information is unnecessary for the proper performance of the functions of the agency.

The information collected from this field is readily available online and is more likely to provide the agency with accurate and useful contact information.

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We hope that these comments are constructive in the completion of the Form 106 revisions and, again, thank you for this opportunity to express Inmar's views. If you have any questions please feel free to contact me at errol.flannery@inmar.com or (817) 868-5668.

Sincerely,
Errol Flannery
Sr. Regulatory Compliance Manager
Inmar Rx Solutions, Inc.