



## DEA Registration: Recommended for Every Veterinarian

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**Frequently, veterinary practices will use one Federal Drug Enforcement Agency (DEA) registration number** to order controlled substances for all veterinarians in the practice. In this case, the DEA registrant must comply with state and federal controlled substance laws and also insure that anyone using controlled substances ordered under his or her DEA number is also compliant. The registrant is also responsible for tracking all controlled substances administered or dispensed, as well as monitoring that controlled substances are stored in a secured, locked cabinet.

The tracking inventory shall include [per 21 CFR § 1304.11(e)(1)(iii)]:

- The name of the substances
- The strength (e.g., 10 mg tab or 10 mg/ml)
- The number of units or volume of each finished form (e.g., 100 tablet bottles or 3-ml vials)
- The number of commercial containers of each finished form (e.g., pack of four 100-tablet bottles, or pack of six 3-ml vials)

Schedule II controlled substances must be logged on a separate sheet, while schedules III-V may be logged together.

Sample controlled substance logs are available on the CVMA website: <http://www.cvma.net/images/cvmapdf/ControlledDrugLog2006.pdf>.

### Administering and Dispensing vs. Prescribing Controlled Substances

According to state and federal regulations, use of one DEA number by all practice veterinarians is permitted for ordering, administering and dispensing controlled medications, but not for prescribing them. Federal regulations state, under CFR 1301.22(b):

*“Where the employer is another individual practitioner, the exemption permits the employee-individual practitioner to administer or dispense controlled substances, but not prescribe them.”*

In veterinary practices, any drug (including a controlled substance) is administered when it is used “in house” from the hospital stock for procedures and treatments performed on a patient. Drugs are dispensed when a veterinarian sends a client home with a supply to use from the hospital stock.



Medications or devices are prescribed when a veterinarian gives a written authorization to a client to be filled at a third party pharmacy, or when a veterinarian provides oral instructions directly to a third party pharmacy on a patient's behalf. It is unlawful to write a prescription to obtain stock. Prescriptions are orders for individual patients only. Controlled drug prescriptions must be completed according to specific regulations. To view them, visit: <http://www.cvma.net/doc.asp?id=2387&pid=20091>.



While it is acceptable for only one veterinarian in a practice to have a DEA number, the CVMA recommends that each veterinarian have his or her own DEA registration number because in California, clients have a legal right to request a written prescription in lieu of dispensed medication (Business and Professions Code Section 4170(a)(6)). Current law states that only the veterinarian who has established a Veterinarian-Client-Patient relationship can prescribe for that patient.

### Multiple Practice Locations

If a veterinary practice has multiple locations, DEA regulations stipulate that a separate registration number is required for each location where controlled substances are shipped to, stored at, and dispensed from, according to 21 CFR 1301.12(a). This is the same for veterinarians ordering controlled substances for a shelter, wildlife rehabilitation facility, or animal control agency. In addition, controlled substances cannot be taken from location to location within the same practice or between facilities without an invoice form (DEA Form 222) to document the transfer of the substance between them.

In summary, a federal DEA registration is not required for a veterinarian, provided that he or she only administers and dispenses controlled substances as an agent of a DEA registrant. If a veterinarian prescribes a controlled substance to a client, which is the client's right under the law, then a separate, individual DEA number is required.

Additional information can be found at the Drug Enforcement Administration website, <http://www.deadiversion.usdoj.gov/faq/prescriptions.htm> and the California Veterinary Medical Board website, [www.vmb.ca.gov](http://www.vmb.ca.gov).

Contact the CVMA's Director of Regulatory Affairs, Dr. Grant Miller, at (916) 649-0599 or [gmillar@cvma.net](mailto:gmillar@cvma.net) with further questions.