



ARIZONA

State-Specific Controlled Substance Requirements

Updated 6/26/23

Biennial Inventory (DEA):	<p>A physical inventory of all controlled substances on hand must be taken at least every <u>two years</u>. The biennial inventory may be taken on any date, which is within two years of the previous biennial or initial inventory. [21 CFR 1304.11]</p> <p>NOTE:</p> <ul style="list-style-type: none"> • Separate biennial inventories must be completed for schedule II and schedule III-V controlled substances. • Biennials may be conducted more frequently than every two years. As a recommendation, conduct your DEA biennial inventory at the same time you conduct your annual inventory for the state. • Biennial inventories must be conducted by the DEA registrant, or their designee who has been granted Power of Attorney, along with an authorized witness. <p>Biennial inventories must indicate whether they are conducted at the start or close of business.</p>
Annual Inventory (AZ):	To be conducted on May 1 of each year or as directed by the Board" Ariz. Admin. Code § 4-23-1003
CE:	<p><u>Veterinarian:</u> 20 hours of CE every 2 years.</p> <ul style="list-style-type: none"> • All 20 hours can be obtained via Live or Anytime online. Anytime CE must have a post-course assessment to qualify. • Of the 20 CE hours, at least 18 must be in scientific topics related to veterinary medicine. • No more than 2 CE hours can be in topics related to practice management. <p>See Rule R3-11-401 to 402 for board approved CE parameters.</p> <p>3 CE hours must be obtained in opioid-related, substance use disorder-related, or addiction-related topics for all veterinarians that are authorized to dispense controlled substances AND who have a valid DEA registration number each license renewal cycle.</p> <p><u>Veterinary Technicians:</u> 10 hours every 2 years - Arizona Accepts 10 hours of Online Continuing Education Courses</p> <p>"Licensees shall maintain their own continuing education records described in section 20-2902, subsection F and shall keep the records until the second renewal date after the period for which the continuing education credits were earned." Ariz. Rev. Stat. § 20-2903</p>
Compounding:	<p>"8.2.10 Compounding of a controlled substance by a practitioner is permitted as long as the United States Pharmacopoeia (USP) 795 and 797 standards and guidelines are followed." 24 Del. Admin. Code § 8.0</p> <p><u>Compounding</u> is <u>any manipulation</u> of a drug beyond that stipulated on the drug label. Veterinary drugs should only be compounded based on a licensed veterinarian's prescription, and to meet the medical needs of a specific patient. Manipulation might include mixing, diluting, concentrating, flavoring, or changing a drug's dosage form. Examples of compounding include:</p> <ul style="list-style-type: none"> • Mixing two injectable drugs in the same syringe • Creating an oral suspension from crushed tablets or an injectable solution • Adding flavoring to a commercially available drug • Creating a transdermal gel for a drug typically taken through other routes • Mixing two solutions for instilling into the ear <p><u>AZ Compounding:</u> <u>"Compounding"</u> means (a) either of the following:</p>



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	<p>i) The preparation, mixing, assembling, packaging or labeling of a drug a pharmacy by a pharmacist or an intern or pharmacy technician under the pharmacist's supervision, for the purpose of dispensing to a patient based on a valid prescription order</p> <p>(ii) The combining, admixing, mixing, diluting, pooling, reconstituting or otherwise altering of a drug or bulk drug substance by or under the supervision of a pharmacist in a federally registered outsourcing facility to create a sterile drug for the purpose of distribution to pharmacies and medical practitioners.</p> <p>(b) Compounding Pursuant to subdivision (a), item (i) of this paragraph, includes both of the following:</p> <p>(i) The preparation of drugs in anticipation of prescription orders prepared based on routine, regularly observed prescribing patterns. And</p> <p>(ii) The preparation of drugs as an incident to research, teaching or chemical analysis or for administration by a medical practitioner to the medical practitioner's patient and not for sale or dispensing.</p> <p>Compounding Pursuant to subdivision (a), item (i) of this paragraph, does not include either of the following:</p> <p>(i) The preparation of commercially available products from bulk compounds.</p> <p>or(ii) The preparation of drugs for sale to pharmacies, practitioners or entities for the purpose of dispensing or detrin.</p> <p>Compounding a drug that is commercially available is prohibited.</p> <p><u>"Outsourcing facility"</u> means a facility that is currently registered with the United States food and drug administration as an outsourcing facility and that meets the requirements of that agency to engage in the compounding and distribution of sterile drugs.</p> <p><u>"Third-party logistics provider"</u> means a person who receives prescription-only drugs only from the original manufacturer, who delivers the prescription-only drugs at the direction of that manufacturer and who does not purchase, sell, trade or take title to prescription-only drugs provides or coordinates warehousing or other logistics services for drugs on behalf of a manufacturer, drug repackager, wholesaler or pharmacy but who does not take ownership of the drugs and does not have the responsibility to direct the sale or disposition of the drugs.</p> <p><u>Resident Pharmacies:</u> A resident pharmacy may compound drugs for distribution to a resident medical practitioner for the purpose of administration to the medical practitioner's patient. The amount of drug a resident pharmacy distributes under this subsection may not exceed five percent of the total number of drug dosage units dispensed and distributed by the resident pharmacy on an annual basis.</p> <p>A resident pharmacy may dispense and ship compounded drugs into another state or jurisdiction only pursuant to a valid patient-specific prescription order and in compliance with the applicable laws of the receiving state or jurisdiction. A resident pharmacy may not distribute compounded drugs into another state or jurisdiction.</p> <p><u>Nonresident Pharmacies:</u> A nonresident pharmacy with a current board-issued permit may dispense and ship compounded drugs into this state only pursuant to a valid patient-specific prescription order. A nonresident pharmacy may not distribute compounded drugs into Arizona.</p>
<p>Dispensing:</p>	<p><u>"Dispense"</u> means to deliver to an ultimate user or research subject by or pursuant to the lawful order of a practitioner, including prescribing, administering, packaging, labeling or compounding as necessary to prepare for that delivery.</p> <p><u>"Dispenser"</u> means a practitioner who dispenses.</p> <p><u>Changes under the 2018 Arizona Opioid Epidemic Act:</u></p>



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	<p>4. Requires a veterinarian who dispenses a schedule II drug or a benzodiazepine to comply with all of the following:</p> <ul style="list-style-type: none"> a) limits the initial amount of a schedule II controlled substance dispensed by a veterinarian to a 5-day supply at a dosage that is clinically appropriate for the animal being treated. (A prescription that is filled at a pharmacy is not subject to this limit); b) limits the initial amount of a benzodiazepine dispensed by a veterinarian to a 14-day supply at a dosage that is clinically appropriate for the animal being treated. (A prescription that is filled at a pharmacy is not subject to this limit); and c) limits dispensing by a veterinarian for an animal with a chronic condition* to one, 30-day supply at a time after the initial prescription limits have been exhausted. (A prescription filled at a pharmacy is not subject to this limit.) <p>*"<u>chronic condition</u>" for the purposes of this section means a condition that requires ongoing treatment beyond the 5-day or 14-day period noted above, including cancer, post-surgical treatment, post-traumatic injury, neuropathic pain, chronic severe cough, collapsing trachea and congestive heart failure.</p> <p>5. Specifies that the initial prescriptions that are filled at a pharmacy are not subject to the supply time limitations.</p> <p>2018 Arizona Opioid Epidemic Act:</p> <p>Arizona guidelines for dispensing controlled substances.</p>
<p>Diversion Reporting:</p>	<p>The 2018 Arizona Opioid Epidemic Act requires a veterinarian who reasonably suspects or believes that an individual is attempting to obtain controlled substances for a reason other than to treat an animal to report the suspicion to local law enforcement within 48 hours. It is NOT necessary to report this information to the Board. The report must include specified identifying information. Veterinary records pertaining to the investigation must be provided to law enforcement upon request.</p> <p>Veterinarians who makes a report in good faith are granted immunity from civil liability.</p> <p>Suspicious activity and or theft involving controlled substances should be reported to the Attorney General. Prescription Drug Diversion: Suspicious Activity Report Form</p>
<p>Euthanasia:</p>	<p>Euthanasia may be performed by:</p> <ul style="list-style-type: none"> ▪ Licensed veterinarians ▪ County, city and town animal pounds under procedures established by the State Veterinarian
<p>Ownership:</p>	<p>Non-veterinarian ownership is allowed but a licensed veterinarian is required to be on the clinic/hospital premises permit as the licensee responsible for the clinic.</p>
<p>Power of Attorney:</p>	<p>Arizona law has requirements for the Principal, witness, Attorney in Fact, Notary, as well as the Power of Attorney form.</p>
<p>Prescribing:</p>	<p>"<u>Prescription</u>" means either a prescription order or a prescription medication.</p> <p>"<u>Prescription medication</u>" means any drug, including label and container according to context, that is dispensed pursuant to a prescription order.</p> <p>Veterinarians are exempt from the requirement to no longer dispense schedule II opioids, except for medical-assisted treatment (MAT) for substance abuse per the 2018 Arizona Opioid Epidemic Act.</p> <p><u>Schedule IIs</u>: a health professional shall limit the initial prescription for a schedule II opioid to not more than a five-day supply, except an initial opioid prescription following a surgical procedure is limited to a 14-day supply. (A.R.S. § 32-3248)</p>



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	<p><u>E-prescribing</u>: mandated e-prescribing of opioids was initiated January 1, 2020. As per §36-2525(R) veterinarians are currently exempted from the EPCS requirements.</p>
<p>PSMP (AZ):</p>	<p>Arizona Veterinarians do not need to register with the AZ CSPMP. In 2015, the Arizona Legislature passed Senate Bill 1370 (Laws 2015, Ch. 46) that removed the requirements for Arizona Veterinarians to register with and report dispensing to the Controlled Substances Prescription Monitoring Program. The law went into effect on January 1, 2016.</p> <p>However, beginning April 26, 2018: "A. <u>A veterinarian who reasonably suspects or believes that a client or person is trying to obtain controlled substances with an intent other than to treat the patient animal shall report that suspicion, or cause a report to be made, to local law enforcement within forty-eight hours after the treatment or examination.</u> The report shall include the name and address of the client or person who sought the examination or treatment. The veterinary records pertaining to the investigation initiated pursuant to the report to law enforcement under this subsection shall be provided to local law enforcement on request for any further criminal investigation. "B. A veterinarian who files a report or causes a report to be filed pursuant to subsection a of this section is immune from civil liability with respect to any report made in good faith." (A.R.S. § 32-2239.01)</p> <p>Veterinarians are not required to report dispensations to the AZ CSPMP. An exemption was passed in 2016.</p>
<p>Premises license:</p>	<p>A premises license issued by the Board is required whenever veterinary medical services will be provided to the public. <u>Complete applications and fees must be received at the Board office BEFORE services can be provided;</u> an acknowledgement of receipt will be mailed to applicants.</p> <p>Within approximately 90 days of the Board's receipt of the application, the Board's Premises Compliance Inspector will notify the premises staff of the upcoming premises inspection. Please review the Inspection Report (a.k.a. "checklist") to assist in complying with the Board's requirements for premises. Feel free to call Board staff with any questions pertaining to compliance or if you need assistance completing the application.</p> <ul style="list-style-type: none"> • <u>Renewal/expiration</u>: A Premises License expires December 31st of every even-numbered year and may be renewed. <i>*If you need to overnight your application, we recommend using UPS or FedEx, etc. rather than USPS. "Overnight" USPS mail gets to us a day late.</i> • <u>Address change</u>: If there is a change in location, ownership, or designated Responsible Veterinarian, a new application with fee must be submitted to the Board and must be submitted PRIOR to the change occurring. This will allow continuous operation of the premises. • <u>Name/Scope of practice change</u>: If there is a change to the premises name or scope of practice, the Premises Name Change/Scope Form must be completed and submitted to the Board, however no fee is required. Premise Name Change Form <p><u>License holder</u>: The Responsible Veterinarian holds the premises license. This person is responsible for maintaining the records of the veterinary practice, ensuring the equipment is adequate, and that sanitation is maintained and for all premises personnel and patients.</p> <p>Veterinary Premises License Online Form Fee: \$50 (even-numbered year) or \$100 (odd-numbered year)</p> <p>Note to Mobile Unit Premises License holders: If your mobile unit is based out of your home and you move, you must re-apply for a new premise license at the new home address if the mobile unit will continue to be based from your home. Further, if you notify the Board of an address and/or employment change, you must signify whether you want the address information changed for just</p>



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	<p>your veterinary license or for both the veterinary license AND the premise license! We will not automatically change your premises information based on an address change form!</p> <p>Note to Premises License Applicants with Mobile Clinics: A mobile clinic (i.e. a vehicle such as a RV where services are provided <i>inside</i> the vehicle) premises license cannot be combined with a license for a clinic/hospital.</p> <p>https://vetboard.az.gov/licensing/premises</p>
Recordkeeping:	<p><u>Patient records</u>: must be kept for three years from the last date of service even if the animal is deceased.</p> <p><u>Controlled substance records</u>: must be maintained at the registered premises for at least two years.</p>
State-Scheduled CS's:	Ephedrine is a schedule IV controlled substance.
State CS License:	Arizona does not require DEA registrant practitioners to obtain a second state controlled substance license, just a DEA registration and an active Veterinary Medical Professional License to practice in Arizona.
Supervision:	<p><u>"DIRECT SUPERVISION"</u> MEANS THAT A LICENSED VETERINARIAN IS PHYSICALLY PRESENT AT THE LOCATION WHERE ANIMAL HEALTH CARE IS BEING PERFORMED.</p> <p><u>"INDIRECT SUPERVISION"</u> MEANS THAT A LICENSED VETERINARIAN IS NOT PHYSICALLY PRESENT AT THE LOCATION WHERE ANIMAL HEALTH CARE IS BEING PERFORMED BUT HAS GIVEN EITHER WRITTEN OR ORAL INSTRUCTIONS FOR TREATMENT OF THE ANIMAL PATIENT.</p> <p><u>"SUPERVISING VETERINARIAN"</u> MEANS A LICENSED VETERINARIAN WHO IS RESPONSIBLE FOR THE CARE RENDERED TO AN ANIMAL BY A CERTIFIED VETERINARY TECHNICIAN OR A VETERINARY ASSISTANT.</p> <p>§ 32-2245. Certified veterinary technician; services; rules and regulations B. Services performed by a certified veterinary technician shall not include surgery, diagnosis or prognosis of animal diseases or prescribing of drugs and medicine.</p>
Telemedicine:	<p>If the VCPR is established via telemedicine the veterinarian must gather sufficient information to initiate a preliminary diagnosis and conform to the minimum standard of care.</p> <p>Where telemedicine occurs is not defined.</p>
Veterinary Professional License:	<p><u>Veterinarians</u> <u>Renewal</u>: Each renewal period is every two years. <u>Expiration</u>: All licenses and certificates expire December 31st. If your license or certificate has expired and you wish to determine if you are eligible to reinstate, please contact Board staff at licensing@vetboard.az.gov or 602-542-8166.</p> <ul style="list-style-type: none"> ▪ To determine the status of your license or certificate, go to the licensee directory. ▪ December 31, 2024 is the next license renewal deadline in Arizona. <p><u>Veterinary Technicians:</u> <i>To work as a veterinary technician in Arizona, certification is not required; earning a CVT is a voluntary action.</i> All veterinary technicians work under the supervision of a licensed veterinarian. While a veterinary technician can assist in performing a wide variety of tasks, they cannot diagnose, prescribe, perform surgery, or engage in any activity prohibited by a state's veterinary practice act.</p> <p>CVT Application (DO NOT use until you have passed the VTNE)</p>



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	CVT Change of Information Form
VCPR:	<p>A VCPR may be established by telephone per Executive Order 2020-19 enacted by Governor Ducey on April 1, 2020.</p> <p>VCPR can apply to any vet working at the same practice.</p> <p>"<u>Veterinarian client patient relationship</u>" means all of the following:</p> <ol style="list-style-type: none"> a. The veterinarian has assumed the responsibility for making medical judgments regarding the animal's health and need for medical treatment and the client, owner or caretaker has agreed to follow the veterinarian's instructions; b. The veterinarian has sufficient knowledge of the animal to initiate at least a general or preliminary diagnosis of the animal's medical condition. Sufficient knowledge is obtained when the veterinarian has recently seen and is personally acquainted with the keeping and caring of the animal as a result of examining the animal, when the veterinarian makes medically appropriate and timely visits to the premises where the animal is kept or when a veterinarian affiliated with the practice has reviewed the medical record of such examinations or visits; c. The veterinarian is readily available for a follow-up evaluation or the veterinarian has arranged for either of the following: <ol style="list-style-type: none"> i. Emergency coverage; ii. Continuing care and treatment by another veterinarian who has access to the animal's medical records (A.R.S. § 32-2201). <p>unprofessional or dishonorable conduct includes:</p> <ul style="list-style-type: none"> ▪ Performing veterinary services without having a valid veterinarian client patient relationship. ▪ Releasing, prescribing or dispensing any prescription drugs in the absence of a valid veterinarian client patient relationship (A.R.S. § 32-2232).

Information and Resources

FEDERAL:

Drug Enforcement Administration, Phoenix Division
 3439 East University Drive
 Phoenix, AZ 85034
 Phone: (571) 362-5600

Local Offices

Flagstaff – 928-323-5447
 Lake Havasu – 602-722-7153
 Nogales - 571-324-7066
 Sierra Vista – 571-362-1180
 Tucson – 571-324-7218
 Yuma – 571-324-7324

Federal Law: www.deadiversion.usdoj.gov
 Controlled Substances Act: [21 USC 801 – 904](#)



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Code of Federal Regulations: [21 CFR Part 1300 – 1399](#)

NDC drug: www.fda.gov/Drugs/DevelopmentApprovalProcess/UCM070829

Diversion Control Division: <https://www.deadiversion.usdoj.gov/schedules/>

STATE:

Arizona State Veterinary Board website: <https://vetboard.az.gov>

Arizona State Board of Pharmacy website: <https://pharmacy.az.gov>