



DISTRICT OF COLUMBIA

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 state biennial inventory. • 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> <p>DC follows the same biennial inventory requirements as the DEA.</p>
CE:	<p><u>Licensed Veterinarians</u>: 36 hours of CE approved by national and local associations every two years.</p> <p>See Regulations 2808 and 2809 (pages 5-6) for board approved CE parameters.</p> <ul style="list-style-type: none"> • All 36 hours can be obtained online. • All 36 CE hours must contribute to the growth of a veterinarian's professional competence in veterinary medicine. • 4 CE hours must be in the public health priorities of the District. See the Public Notice to view public health issues for CE that have been identified as key public health priorities. <p><u>Veterinarian Techs</u>: no current requirements.</p> <p>DC does not currently require controlled substance CE</p>
Compounding:	<p>Compounding 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.</p> <p>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>DC Compounding: https://dchealth.dc.gov/service/pharmacy-laws-and-regulations</p>
DC PDMP:	<p>All prescribers and dispensers who are licensed in DC are required to register with the DC PDMP, including those who practice in other states or jurisdictions. Veterinarians are NOT exempt.</p> <p>Registering:</p>



DISTRICT OF COLUMBIA

State-Specific Controlled Substance Requirements

- Registration is free.
- Even if you have registered with a PDMP in another state, you still have to complete the registration process for the DC PDMP. Please refer to the [Health Care Reporting Amendment Act of 2020](#) for additional information.
- If a retired prescriber or dispenser still maintains a DC professional license, they still must register with the DC PDMP.

Register on the DC PDMP website: <https://districtofcolumbia.pmpaware.net/login>

Licensed practitioners will need the following information to complete registration:

- DC Professional License Number (including prefix letters)
- DEA Number, if applicable (two letters followed by seven numbers)
- DC Controlled Substance Registration Number, if applicable (including prefix letters)
- Employer National Provider ID (NPI), if applicable
Veterinarians may enter a string of seven zeros (000000) in place of an NPI number

After filling out your information you will be required to verify your email address. Please click the link in the automatically generated email to complete your registration.

Registration options: Those without a DEA number may register as a “Prescriber without DEA”. Those without an NPI number may register as “Non-Dispensing Pharmacist.”

Proof of registration: If you ever need to prove that you registered for the DC PDMP, you can download your registration PDF. You can access the document in the PDMP system. Once you are logged in, click on your name in the top right corner, then click “My Profile” from the drop down list, and then click the “Download PDF” icon on the right under the DC Health logo. That PDF will include your registration information.

D.C. Law 23-251. Prescription Drug Monitoring Program Query and Omnibus Health Amendments Act of 2020 requires prescribers and dispensers who are licensed in DC to query the PDMP for the following circumstances:

- prior to prescribing or dispensing an opioid or benzodiazepine for more than 7 consecutive days and every 90 days thereafter while the course of treatment or therapy continues, or
- prior to dispensing another refill after 90 days

Delegates: A prescriber or dispenser authorized to access prescription monitoring data **may delegate their authority to access the data to up to two** health care professionals who are:

- Licensed, registered, or certified by a health occupations board
- Employed at the same location and under the direct supervision of the prescriber or dispenser.

Delegates must submit the [Delegate Registration Form](#).

Delegate ineligibility: If the delegate becomes ineligible at any time, the program must be notified in writing **within 24 hours**.

Delegate Renewal: Registration for delegates **expires June 30th of every even numbered year**.

Reporting Non-DEA drugs to the DC PDMP:



DISTRICT OF COLUMBIA

State-Specific Controlled Substance Requirements

	<p>In D.C., Schedule II, III, IV and V controlled substances, as well as products containing the covered substances Butalbital, Cyclobenzaprine, and Gabapentin must be reported to the DC PDMP.</p>
<p>Dispensing:</p>	<p>“<u>Dispense</u>” means to distribute a controlled substance to an ultimate user or research subject by or pursuant to the lawful order of a practitioner, including the prescribing, administering, packaging, labeling, or compounding necessary to prepare the substance for that delivery.</p> <p>“<u>Dispenser</u>” means a practitioner who dispenses.</p> <p><u>2813 Management and Use of Drugs</u></p> <p>All drugs shall be dispensed by a veterinarian, or by a veterinary assistant pursuant to a prescription of a veterinarian. A veterinarian shall thoroughly inspect the prepared prescription and verify its accuracy in all respects.</p> <p>All drugs dispensed by a veterinarian shall be labeled with the following information:</p> <ul style="list-style-type: none"> (a) The name, address, and telephone number of the animal facility; (b) The name and strength of the drug; (c) The name of the client and animal identification; (d) The date dispensed; (e) Directions for use; (f) The expiration date of the drug, where applicable; and (g) The name of the prescribing veterinarian. <p>(a) Except when dispensed directly by a practitioner, other than a pharmacy, to an ultimate user, no controlled substance in Schedule II may be dispensed without the written prescription of a practitioner.</p> <p>(b) In emergency situations, as defined by rule of the Mayor, Schedule II drugs may be dispensed upon oral prescription of a practitioner, reduced promptly to writing and filed by the pharmacy. Prescriptions shall be retained in conformity with the requirements of § 48-903.06. No prescription for a Schedule II controlled substance may be refilled.</p> <p>(c) Except when dispensed directly by a practitioner, other than a pharmacy, to an ultimate user, a controlled substance included in Schedule III or IV which is a prescription drug as determined under § 353(b) of Title 21, United States Code, shall not be dispensed without a written or oral prescription of a practitioner. The prescription shall not be filled or refilled more than 6 months after the date thereof or be refilled more than 5 times, unless renewed by the practitioner.</p> <p>(d) A controlled substance included in Schedule V shall not be distributed or dispensed other than for a medical purpose.</p> <p>(e) Whenever a practitioner dispenses any controlled substance on a written or oral prescription issued by a practitioner, the practitioner shall affix to the container in which such controlled substance is dispensed a label showing the name of the controlled substance or controlled substances contained therein unless otherwise so indicated by the prescribing practitioner; the serial number and date of initial filling; the directions for use; the practitioner’s name and registry number; the name of the ultimate user, or if the ultimate user is an animal, the name of the owner and the species of the animal; the name</p>



DISTRICT OF COLUMBIA

State-Specific Controlled Substance Requirements

	<p>of the practitioner issuing the prescription; and caution statements, if any, as required by law. § 48-903.08. Prescriptions</p> <p>All drugs dispensed by a veterinarian shall be in air-tight and light-resistant containers. All drugs dispensed by any veterinarian shall be in approved safety closure containers, unless the owner of the animal expressly requests that the medication not be provided in such containers.</p> <p>A veterinarian shall keep an account of all drugs prescribed, administered, or dispensed in the client record. DC Municipal Regulations</p>
Diversion Reporting:	Follow DEA reporting guidelines.
Euthanasia:	<p>Euthanasia may be performed by licensed veterinarians or a person certified as a veterinary euthanasia technician under general supervision of a licensed veterinarian.</p> <p>(a) No person may euthanize an animal without first obtaining certification by the Board of Veterinary Medicine as a veterinary euthanasia technician. § 3-1208.64.</p>
Ownership:	D.C. restricts the corporate practice of medicine. Veterinary ownership is required.
Power of Attorney Notarization:	<p>The District of Columbia adopts the Uniform Power of Attorney Act published by the Uniform Law Commission. The Act does not require a power of attorney to be acknowledged before a Notary Public but grants a presumption of genuineness to any power of attorney that is. DC B24-0121</p>
Premises Permit:	<p>§ 47-2888.03. Veterinary facility license, fees.</p> <p>(a) The application for a veterinary facility license shall be made on a form to be prescribed by the Mayor and shall be accompanied by the required fee. Each application shall list each certificate of approval, authority, occupancy, and any other prerequisite required as a precondition for operation of a veterinary facility.</p> <p>(b) A license shall be valid for a period of one year and shall be limited to the premises or the vehicle stated on the license. A license may be renewed for additional one-year periods upon payment of the appropriate fee.</p> <p>(c) A license issued under this section shall be posted in a conspicuous place on the premises. A mobile facility license shall be posted in a conspicuous place on the vehicle.</p> <p>(d) The Mayor may issue a license that clearly specifies the scope of the facility's operation. The specifications shall not confer or denote an area of specialty by the veterinary facility or by the holder of the license. The Mayor shall determine the terms and restrictions that apply to the specifications by rulemaking.</p> <p>(e) The initial fees shall be as follows: (1) Original veterinary facility license, \$195;</p> <p>(f) The Mayor may periodically adjust the fees by publishing notice in the District of Columbia Register 30 days before changing the fees. § 47-2888.03</p> <p>Online facility license renewal</p> <ul style="list-style-type: none"> ▪ Renewal Fee: \$170
Prescribing:	2813 Management and Use of Drugs



DISTRICT OF COLUMBIA

State-Specific Controlled Substance Requirements

	<p>A veterinarian shall prescribe drugs only by a written prescription or on oral prescription to a pharmacist as authorized by, and in compliance with, applicable with, applicable District and federal laws and regulations.</p> <p>A written prescription shall have the following:</p> <ul style="list-style-type: none"> (a) Be signed by the prescribing veterinarian; (b) Be dated on the day issued; (c) Contain the full name and street address of the owner of the animal, the species of animal for which the drug is prescribed; and (d) Contain the full name and street address of the veterinarian and the veterinarians' Drug Enforcement Administration number. <p>Drugs may be administered only by a veterinarian or a veterinary assistant properly trained by a veterinarian in the manner of such administration of drugs and under the immediate direction of a veterinarian.</p> <p>DC Municipal Regulations</p> <p>"veterinarians seeking to provide continued prescriptions of a controlled substance shall evaluate the patient at least every three (3) months and document such prescribing in the patient record." D.C. Mun. Regs. tit. 17 § 2815</p> <p>A veterinarian shall not prescribe drugs for use by humans. 2813.2</p> <p>A veterinarian shall prescribe drugs only by a written prescription or on oral prescription to a pharmacist as authorized by, and in compliance with, applicable with, applicable District and federal laws and regulations.</p> <p>https://doh.dc.gov/sites/default/files/dc/sites/doh/publication/attachments/Veterinarian_DC_Municipal_Regulations_For_Veterinarians.pdf</p> <p><u>e-prescribing</u>: District of Columbia law allows e-Prescribing of all drugs to allow practitioners and pharmacies in DC to be compliant with the Federal SUPPORT ACT of 2018 but IT IS NOT MANDATED.</p>
<p>Recordkeeping:</p>	<p><u>Patient records</u>: veterinarian shall keep the records required by this section for a period of three (3) years following the last office visit or discharge of such animal from the animal facility. 2811.2.</p> <p><u>Registered pharmacy records</u>: "maintain on a current basis a complete and accurate record of all prescription drugs and devices received, sold, compounded, dispensed, or otherwise disposed of by the pharmacy for a period of five (5) years." D.C. Mun. Regs. tit. 22 § B1913</p> <p><u>Controlled substance records</u>: maintain at the registered premises for three years.</p> <p>A veterinarian shall comply with the record keeping requirements for drugs specified in §2814. DC Municipal Regulations</p>
<p>Schedule II Controlled Substances:</p>	<p>A veterinarian shall keep Schedule II controlled substances in a locked area. Only a veterinarian shall have access to such drugs. 2814.5</p>
<p>State (DC) Veterinary License:</p>	<p>In D.C., the DC Board of Veterinary Medicine regulates the practice of veterinarians and veterinary facilities.</p> <p><u>Veterinarians:</u> New Veterinary License Online Application</p>



DISTRICT OF COLUMBIA

State-Specific Controlled Substance Requirements

	<p>Renewals: The term of a license issued or renewed shall be 2 years and shall expire at midnight on December 31 of each odd-numbered year, unless the Director changes the renewal system pursuant to § 3306. Title 17, 2807.1 Online veterinary license renewal <i>December 31, 2023 is the next license renewal deadline in the District of Columbia.</i></p>
State Scheduled CS's:	N/A
Supervision:	<p>"<u>Direct supervision</u>" means that a veterinarian currently licensed to practice veterinary medicine in the District is available on the premises and within immediate vocal communication of the supervisee.</p> <p>The veterinarian shall be present during the maintenance and monitoring of anesthesia to an animal by a nurse, veterinary assistant or other employee. DC Municipal Regulations</p>
Telemedicine:	No current regulations. Where telemedicine occurs is not defined.
VCPR:	<p>D.C. does not define VCPR in its Practice Act. However, to be conservative, utilize the general guideline of establishing VCPR with in-person visits at least annually.</p> <p>A valid <u>veterinarian-client-patient relationship</u> is one in which:</p> <ul style="list-style-type: none"> (a) The veterinarian has assumed the responsibility for making medical judgments regarding the health of the patient and the client has agreed to follow the veterinarian's instructions; (b) The veterinarian has sufficient knowledge of the patient to initiate at least a general or preliminary diagnosis of the medical condition of the patient. This means that the veterinarian is personally acquainted with the keeping and care of the patient by virtue of: <ul style="list-style-type: none"> (1) A timely examination of the patient by the veterinarian, or (2) Medically appropriate and timely visits by the veterinarian to the operation where the patient is managed; (c) The veterinarian is readily available for follow-up evaluation in case of an adverse drug reaction or failure of therapy or has arranged for the following: <ul style="list-style-type: none"> (1) Veterinary emergency coverage, and (2) Continuing care and treatment; (d) The veterinarian provides oversight of treatment and outcome; and (e) Patient records are maintained. <p>D.C. Mun. Regs. tit. 17 § 2814</p>

Information and Resources

FEDERAL:

Drug Enforcement Administration, DC Division
 800 K Street, N.W
 Suite 500
 Washington, DC 20001
 Phone: (202) 305-8500



DISTRICT OF COLUMBIA

State-Specific Controlled Substance Requirements

Federal Law: www.deadiversion.usdoj.gov

Controlled Substances Act, [21 USC 801 – 904](#)

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/>

FDA Center For Veterinary Medicine – <https://www.fda.gov/animal-veterinary>

STATE:

DC Board of Veterinary Medicine - <https://dchealth.dc.gov/service/veterinarians-licensing>

DC Board of Pharmacy - <https://dchealth.dc.gov/service/pharmacy-licensure>

DC Controlled Substances Policy - <https://code.dccouncil.us/dc/council/code/titles/48/chapters/9/>