



Missouri

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 (MO):	<p>(3) <u>Annual Inventory Date</u>. After the initial inventory is taken, the registrant shall take a new inventory of all stocks of controlled substances on hand at least once a year. The annual inventory may be taken on any date that is within one year of the previous annual inventory date.</p> <p>Mo. Code Regs. tit. 19 § 30-1.042</p>
CE:	<p><u>Veterinarian</u>: 10 hours, annually</p> <ul style="list-style-type: none"> • All 10 hours can be obtained online. • 6 CE hours must be on scientific (medical) subjects. • No more than 4 CE hours can be on non-scientific subjects related to the practice of veterinary medicine such as communication skills, medical record keeping, stress management, or practice management. <p>See 20 CSR 2270-4.042 for board approved CE parameters.</p> <p><u>Veterinarian Tech</u>: RVTs in Missouri are required to obtain a total of 10 CE hours every 2 years. CE does not have to be RACE approved, but it does have to be approved through the Missouri Veterinary Medical Board.</p> <p>"The continuing education reporting period shall begin each year on December 1 and end November 30 of the following year. Continuing education hours earned after November 30 apply to the next reporting cycle. A renewal license will not be issued until all renewal requirements have been met."</p> <p>Missouri does not currently require controlled substance CE.</p> <p><u>Proof of Completion</u>: "Pursuant to section 340.258, RSMo, all licensees shall provide satisfactory evidence of having completed at least ten (10) hours of continuing education each year that is relevant to the practice of veterinary medicine and in accordance with this rule in order to renew their licenses."</p> <p>(13) "A licensee who completes more than ten (10) continuing education hours, excluding self-study, during the current reporting period may receive credit for the excess hours, not to exceed ten (10), in the next succeeding reporting period. Continuing education hours cannot be carried over more than one (1) continuing education reporting period after being earned."</p> <p>20 CSR 2270-4.042.</p>



Missouri

State-Specific Controlled Substance Requirements

Compounding:

"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](#)

Compounding is any manipulation 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:

- 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

MO Compounding:

(1) Compounding is defined as the preparation, incorporation, mixing and packaging or labeling of a drug or device as the result of a prescriber's prescription or prescription drug order based on the prescriber/patient/pharmacist relationship in the course of professional practice. Compounding may also be defined as the preparation, incorporation, mixing and packaging or labeling of a drug or device, for the purpose of, or as an incident to, research, teaching or chemical analysis and not for sale or dispensing purposes.

[Mo. Code Regs. tit. 20 § 2220-2.400](#)

(12) "Except as provided by law, pharmacists shall not offer or provide compounded preparations to other pharmacies, practitioners, or entities for subsequent dispensing, distribution, resale, or administration, except in the course of professional practice for a prescriber to administer to an individual patient by a prescription dispensed by the pharmacy. A pharmacist or pharmacy may advertise or otherwise provide information concerning the provision of compounding services; however, no pharmacist or pharmacy shall attempt to solicit business by making specific claims about compounded preparations."

(13) "Pharmacies may provide non-patient specific compounded preparations for veterinary use to a Missouri-licensed veterinarian to administer and dispense to the veterinarians' animal patients, provided the following:

(A) The preparation container is labeled with:

1. Pharmacy name, address, and telephone number;
2. Date of distribution; 3. Veterinarian's name;
4. Preparation name, strength, dosage form, and quantity;
5. Name of each active or therapeutic ingredient included in the preparation;
6. Preparation lot/batch number;
7. Preparation beyond-use date; and

8. Statement: "Office Stock Compounded Preparation";

(B) The pharmacy maintains a record of the distribution to the veterinarian;

(C) The pharmacy can retrieve distribution records by specific veterinarian, if requested;

(D) In lieu of paragraph (7)(A)7., the veterinarian's name may be recorded on the compounding log; and

(E) The pharmacy complies with all applicable controlled substance laws and regulations."

[20 CSR 2220-2.400 Compounding Standards of Practice](#)



Missouri

State-Specific Controlled Substance Requirements

Dispensing:	<p><u>Dispense</u>. The act of dispensing includes the selection and labeling of prepackaged medications ordered by the physician or advanced practice nurse to be self-administered by the client.</p> <p>(F) All clients shall have the right to receive a written prescription from their veterinarian to take to the pharmacy of their choice so long as a valid veterinarian-patient-client relationship exists. Mo. Code Regs. tit. 20 § 2270-4.031</p> <p><u>Labeling:</u> 4 CSR 150-5.020 and 4 CSR 200-4.200 outline the requirements for labeling of all medications. The label must contain:</p> <ul style="list-style-type: none"> • Date medication dispensed; • Sequential number; • Client name; • Prescriber's direction for usage including frequency and route of administration; • Prescriber's name; • Name and address of the agency dispensing; • Name and strength of the drug dispensed; • Quantity dispensed; and • Number of times refillable, if appropriate or the words "no refill." <p><u>Quantity dispensed:</u> "(H) A veterinarian may dispense no more than a seven- (7-) day supply per patient from an office stock compounded preparation provided by a licensed pharmacy. A patient-specific prescription must be issued to continue treatment beyond seven (7) days and comply with all other requirements under this rule." Mo. Code Regs. tit. 20 § 2270-4.031</p> <p><u>Containers:</u> (D) All repackaged legend drugs dispensed for companion animals shall be in approved safety closure containers, except that this provision shall not apply to drugs dispensed to any person who requests that the medication not be placed in these containers, or in those cases in which the medication is of a form or size that it cannot be dispensed reasonably in these containers.</p>
Diversion Reporting:	<p>All theft, losses and diversion must be reported to the Bureau of Narcotics & Dangerous Drugs (BNDD) upon discovery. The immediate report may be faxed, mailed, telephone or email at BNDD@health.mo.gov. The completed written report via below form must be submitted to the BNDD within 7 days of discovery. If additional time is needed you may contact the BNDD for an extension. Ensure that all required additional information as noted on the bottom of the form is included with submission.</p> <p>Reporting form for theft/loss of controlled substances</p>
Euthanasia:	<p>the following may perform euthanasia:</p> <ul style="list-style-type: none"> ▪ Licensed veterinarians ▪ Temporary licensee under the direct supervision of a licensed veterinarian Registered veterinary technician under the immediate supervision of a licensed veterinarian ▪ Veterinary student under the immediate supervision of a licensed veterinarian
Ownership:	<p>Non-veterinary ownership of a veterinary facility is inconclusive at this time.</p> <p>Section 340.226 "1. A licensed veterinarian may practice veterinary medicine as an employee of a corporation, partnership, or other business organization only so long as the articles of incorporation, partnership agreement, or business organization documents clearly state that the licensed veterinarian is not subject to the direction of anyone not licensed to practice veterinary medicine in Missouri in making veterinary medical decisions or judgments..."</p>
Power of Attorney Notarization:	<p>In Missouri, you are required to sign the medical power of attorney document in the presence of a notary public. Notaries are state-specific and you can only use a notary in your state of residence, in this case, Missouri.</p>



Missouri

State-Specific Controlled Substance Requirements

Prescribing:	<p>For a veterinarian to issue a prescription, a veterinarian-client-patient relationship (VCPR) must be established.</p> <p>(B) The veterinarian in charge is responsible for assuring that any legend drugs and biologicals prescribed for use in the veterinary facility are properly administered, for maintaining accurate records to include strength, dosage and quantity of all medications used or prescribed and for instructions to clients on the administration of drugs when the veterinarian will not be providing direct supervision.</p> <p><u>Associate Veterinarians:</u> associate veterinarians cannot write prescriptions under another person's DEA number. If the associate veterinarian wants to prescribe controlled drugs, they have to get their own personal DEA number.</p> <p><u>E-prescribing:</u> veterinarians are exempt from the mandated e-prescribing of all controlled substances in MO that took effect January 1, 2021.</p>
PDMP:	<p>Missouri was the last state to implement a PDMP program. Veterinarians are exempted from enrollment as data requesters and cannot query the PDMP.</p>
Premises Permit:	<p>(1) All veterinary facilities shall have a facility permit issued by the Missouri Veterinary Medical Board. (2) Applications for facility permits must be made on the forms provided by the board. Permit application forms may be obtained by requesting them from the executive director, Missouri Veterinary Medical Board, P.O. Box 633, Jefferson City, MO 65102. (3) The application must be legible (printed or typed), signed under oath or affirmation by the responsible veterinarian in charge of the facility and accompanied by the appropriate fee. Mo. Code Regs. tit. 20 § 2270-5.011</p> <p>Permit Application</p> <p><u>Renewal:</u> Facility Permit licenses expire March 31 and are renewed annually.</p>
Recordkeeping:	<p><u>Patient records:</u> All records shall be maintained for a minimum of five (5) years after the last visit.</p> <p><u>Controlled substance records:</u> All records shall be maintained for a minimum of five (5) years.</p> <p><u>Computer Records.</u> "Computer records are acceptable medical records so long as the security of the computer is maintained. If computer records are used by a veterinarian, a daily and cumulative monthly back-up shall be made. The board strongly recommends that the information required in section (1) of this rule be maintained on hard copy." https://www.movma.org/page/FAQ#Medical%20Records</p>
State-Scheduled CS's:	<p>Schedule IV:</p> <ul style="list-style-type: none"> ▪ Codeine-containing cough syrup ▪ Ephedrine ▪ Pseudoephedrine
State CS License:	<p>For an individual practitioner to conduct any activities with controlled substances in Missouri, they must obtain registrations from both the Missouri Bureau of Narcotics and Dangerous Drugs (BNDD) first and then the federal Drug Enforcement Administration (DEA) secondly.</p> <p><u>Register:</u> Apply for a registration with the BNDD at the Bureau's website: https://health.mo.gov/safety/bnnd.</p> <p>An application may be submitted either electronically with a click-to-pay online system, or a person may print out the application and mail in a written application.</p>



Missouri

State-Specific Controlled Substance Requirements

	<p><u>Renewal</u>: Registrants must obtain a new registration annually. Registration is required annually on the last day of a given month. Address changes must occur within 30-days of the move or your registration terminates.</p> <p>As a courtesy, the Bureau will send registrants an email reminder 60 days in advance of the expiration date so make sure your email addresses are current.</p> <ul style="list-style-type: none"> ▪ To apply or make changes to your registration electronically go here. (Have your BNDD number and license number on hand). ▪ To apply or make changes with a paper application go here. ▪ Questions? Email bndd@health.mo.gov or call 573-751-6321
<p>Supervision:</p>	<p><u>Supervision</u>:</p> <p>(a) <u>Immediate supervision</u>, "the licensed veterinarian is in the immediate area and within audible and visual range of the animal patient and the person treating the patient;"</p> <p>(b) <u>Direct supervision</u>, "the licensed veterinarian is on the premises where the animal is being treated and is quickly and easily available and the animal has been examined by a licensed veterinarian at such times as acceptable veterinary medical practice requires consistent with the particular delegated animal health care task;"</p> <p>(c) <u>Indirect supervision</u>, "the licensed veterinarian need not be on the premises but has given either written or oral instructions for the treatment of the animal patient or treatment protocol has been established and the animal has been examined by a licensed veterinarian at such times as acceptable veterinary medical practice requires consistent with the particular delegated health care task; provided that the patient is not in a surgical plane of anesthesia and the licensed veterinarian is available for consultation on at least a daily basis;"</p> <p>(19)) <u>Supervisor</u>, "a licensed veterinarian employing or utilizing the services of a registered veterinary technician, veterinary intern, temporary provisional licensee, veterinary medical student, unregistered assistant or any other individual working under that veterinarian's supervision;"</p> <p>(20) <u>Temporary license</u>, "any temporary permission to practice veterinary medicine issued by the board pursuant to section 340.248;"</p> <p>(21) <u>Unregistered assistant</u>, "any individual who is not a registered veterinary technician or licensed veterinarian and is employed by a licensed veterinarian;"</p> <p>Section 340.200</p> <p>Chart of supervision requirements</p>
<p>Telemedicine:</p>	<p>No existing law. Where telemedicine occurs is not defined.</p>
<p>Veterinary Professional License:</p>	<p><u>Veterinarians</u></p> <p><u>Renewal</u>: licenses expire November 30 and are renewed annually November 30, 2023 is the next license renewal deadline in Missouri. Veterinary License Application</p> <p><u>Veterinary Technician:</u></p> <p><u>Renewals</u>: licenses expire November 30 and are renewed annually Veterinary Technician Registration Application</p>
<p>VCPR:</p>	<p>VCPR must be established in-person and only applies to one veterinarian.</p> <p><u>Veterinarian-client-patient relationship</u> means that the veterinarian has recently seen and is personally acquainted with the keeping and care of the animal by virtue of an examination or by medically appropriate and timely visits to the premises where the animal is kept. Section 340.200</p>



Missouri

State-Specific Controlled Substance Requirements

Information and Resources

FEDERAL:

Drug Enforcement Administration, St. Louis Division
317 South 16th Street
St. Louis, MO 63103
Phone: (314) 538-4600

DEA Field Offices:

Cape Girardeau - (573) 334-1534
Jefferson City - (573) 635-1331
Springfield - (417) 888-9800

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/>

STATE:

Missouri Veterinary Board website: <https://pr.mo.gov/veterinarian.asp>

Missouri Board of Pharmacy website: <https://pr.mo.gov/pharmacists.asp>