

# U. S. Department of Justice Drug Enforcement Administration

www.dea.gov

Springfield, Virginia 22152

FEB 2 5 2016

Dear Registrant:

This correspondence outlines the policy of the Drug Enforcement Administration (DEA) regarding the *Veterinary Mobility Act of 2014*, which became effective on August 1, 2014. It is the DEA's position that the new law should be interpreted exactly as it is written.

The Veterinary Medicine Mobility Act of 2014 amended section 302(e) of the Controlled Substances Act, Title 21, United States Code, Section 822(e) (21 U.S.C. § 822(e)) to address separate registration requirements for veterinarians. Specifically, the Act states that a "registrant who is a veterinarian shall not be required to have a separate registration in order to transport and dispense controlled substances in the usual course of veterinary practice at a site other than the registrant's registered principal place of business or professional practice, so long as the site of transporting and dispensing is located in a State where the veterinarian is licensed to practice veterinary medicine and is not a principal place of business or professional practice."

A non-office setting that the veterinarian visits to treat animals on an occasional, as-needed basis would not be a principal place of business or professional practice. Although the following is not the only example covered by 21 U.S.C. § 822(e)(2), a prime example is that a veterinarian may dispense controlled substances while making "house calls" (e.g., at a stable) without being registered at that location. And, in such a scenario, the veterinarian <u>does not need to be registered with the DEA in the State where the dispensing occurs</u>, as long as the veterinarian is registered in some other State and is licensed to practice veterinary medicine in the State where the dispensing occurs.

Should you have any questions pertaining to this matter, please contact your local DEA Field office, or you may contact the DEA Office of Diversion Control, Liaison and Policy Section, at (202) 307-7297.

Sincerely

Louis J. Milione

Deputy Assistant Administrator Office of Diversion Control

H.R. 1528

## One Hundred Thirteenth Congress of the United States of America

#### AT THE SECOND SESSION

Begun and held at the City of Washington on Friday, the third day of January, two thousand and fourteen

### An Act

To amend the Controlled Substances Act to allow a veterinarian to transport and dispense controlled substances in the usual course of veterinary practice outside of the registered location.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

#### SECTION I. SHORT TITLE.

This Act may be cited as the "Veterinary Medicine Mobility Act of 2014".

SEC. 2. TRANSPORT AND DISPENSING OF CONTROLLED SUBSTANCES IN THE USUAL COURSE OF VETERINARY PRACTICE.

Section 302(e) of the Controlled Substances Act (21 U.S.C.

Section 302(e) of the Controlled Substances Act (21 U.S.C. 822(e)) is amended—

(1) by striking "(e)" and inserting "(e)(1)"; and
(2) by adding at the end the following:

"(2) Notwithstanding paragraph (1), a registrant who is a veterinarian shall not be required to have a separate registration in order to transport and dispense controlled substances in the usual course of veterinary practice at a site other than the registrant's registered principal place of business or professional practice, so long as the site of transporting and dispensing is located in a State where the veterinarian is licensed to practice veterinary medicine and is not a principal place of business or professional praccine and is not a principal place of business or professional prac-

Speaker of the House of Representatives.

Vice President of the United States and President of the Senate.