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 does not need to be registered with the DEA in the State where the dispensing occurs, 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