



DEA Overview For Veterinarians

September 10, 2026





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Learning Objectives



Closed System of Distribution

Recordkeeping & Inventory Requirements

Theft and Loss

Security & Destruction

CS Disposal

Prescriptions/Dispensing

Ordering Controlled Substances

Trends to Look For



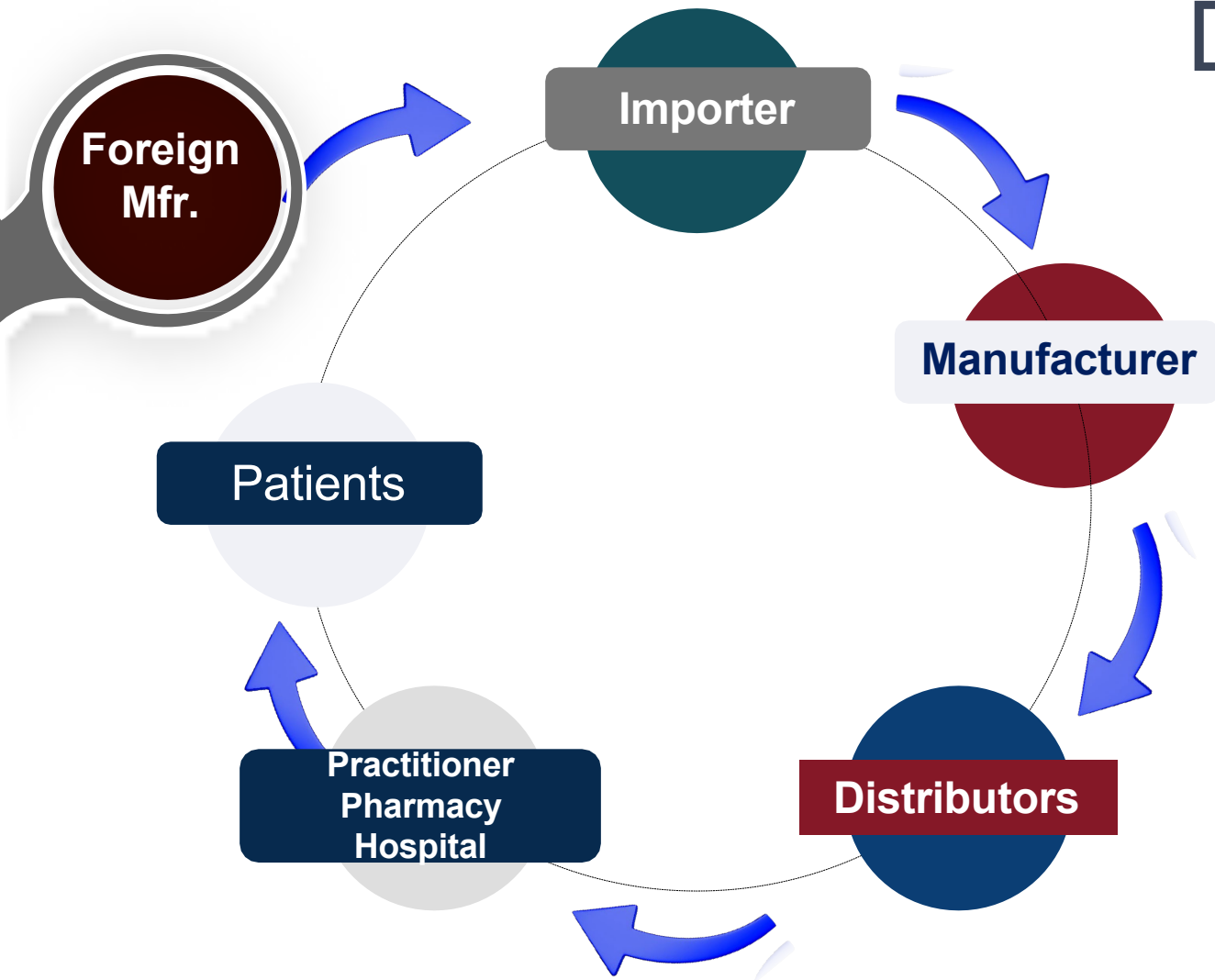
Diversion Control Division



To prevent, detect, and investigate the diversion of controlled substances & listed chemicals from legitimate sources



Closed System of Distribution



DEA is responsible for:

- oversight of the system
- integrity of the system
- protection of the public health and safety

Oversight of Closed System of Distribution





Recordkeeping Responsibilities

The DEA registrant is ultimately responsible for keeping controlled substance records

21 CFR 1304.04(g)



- ✓ Not your nurse
- ✓ Not your office manager
- ✓ Not your corporation
- ✓ Not your vendor
- ✓ Not your employer
- ✓ Not your vet technicians





DEA Required Record Keeping



CSA created a closed system of distribution.
Must keep records for at least two years.



Record all administrations/dispensations.



If recorded in patient files, those files must be made
available for DEA inspection.



All inventories and records of Scheduled II
controlled substances must be kept *separate* from
all other records at registered location.



General Requirements

CONTINUING RECORDS

Kept for two years.

21 CFR. 1304.04(a)

Separate and stored at the registered location.

21 CFR 1304.21(b)

Readily retrievable.

21 CFR 1304.04(f)(2)

Separate for each independent activity and collection activity.

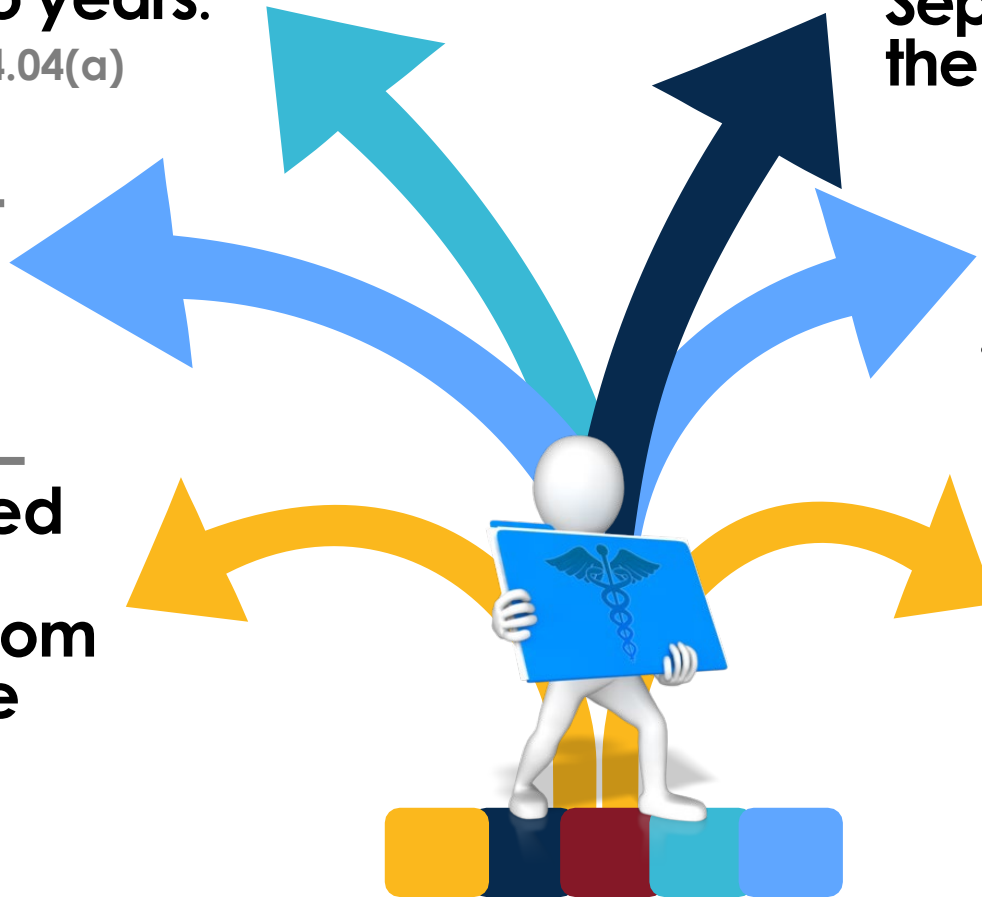
21 CFR 1304.21(c)

Schedule I & II controlled substances must be maintained separately from all other records of the registrant.

21 CFR 1304.04(h)(1)

Complete and accurate.

21 CFR 1304.21(a)





Inventory



Taken at least every two years **21 CFR 1304.04(a)**



All stocks of controlled substances on hand
(including samples)



Physical inventory must include:

- Schedule II on a separate inventory from Schedule III-V **21 CFR 1304.04(g)**
- The date/time the inventory is taken (BOB/COB)
- Kept for at least two years at the registered location **21 CFR 1304.11**
- Must include name of controlled substance, size in finished form (i.e. 100mg), number of doses in finished form (i.e. 100 doses), and number and disposition of each commercial container (i.e. 4X100 tablets bottles)

Theft and Loss Reporting

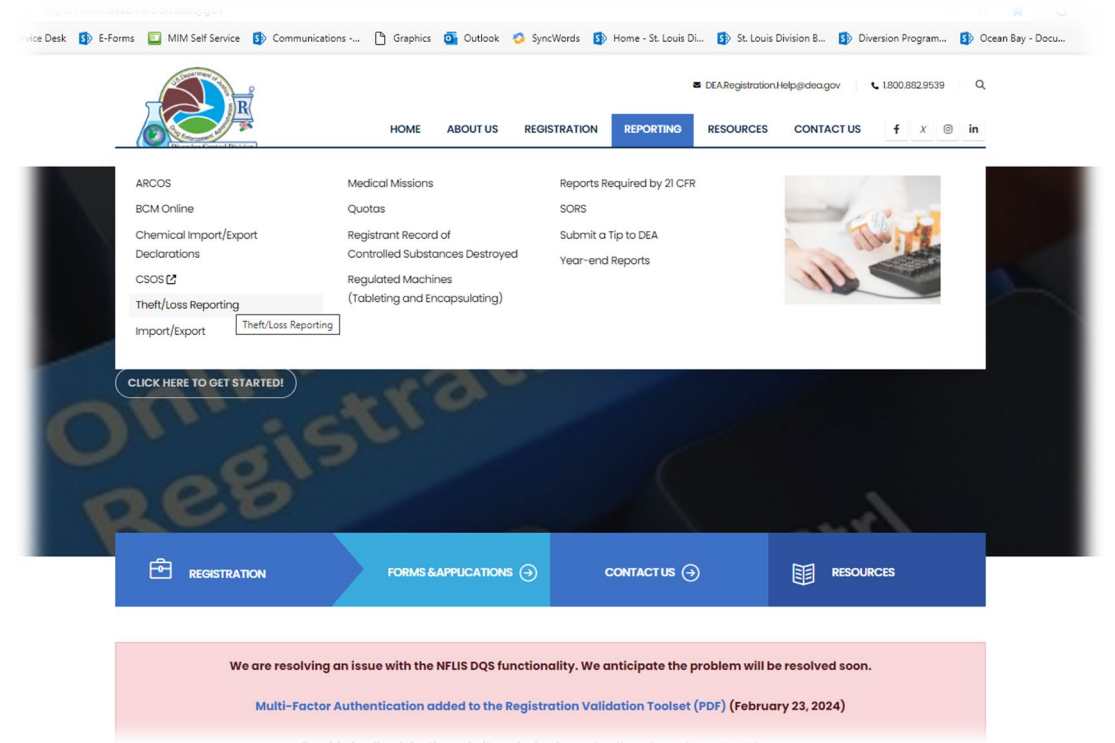


Must report a theft or significant loss to DEA in writing within one business day

Must complete a DEA Form 106 within 45 days, online

Registrants also encouraged to report theft and losses to local law enforcement and state regulatory agencies

21 CFR 1301.76(b)





Reporting a Theft or Significant Loss

21 CFR 1301.76
Other security
controls for
practitioners

When determining whether a loss is significant, a registrant should consider, among others, the following factors:

- (1) The actual quantity of controlled substances lost in relation to the type of business;
- (2) The specific controlled substances lost;
- (3) Whether the loss of the controlled substances can be associated with access to those controlled substances by specific individuals, or whether the loss can be attributed to unique activities that may take place involving the controlled substances;
- (4) A pattern of losses over a specific time period, whether the losses appear to be random, and the results of efforts taken to resolve the losses; and, if known,
- (5) Whether the specific controlled substances are likely candidates for diversion;
- (6) Local trends and other indicators of the diversion potential of the missing controlled substance.





Investigators will inspect overall security procedures and components to ensure that “effective controls to guard against theft and diversion” are met.





REQUIREMENTS

- Provide effective controls and procedures to guard against theft and diversion of controlled substances.

21 CFR 1301.71(a)

- Cannot employ anyone who has a felony drug conviction who will have access to controlled substances, without a DEA approved employment waiver.

21 CFR 1301.76(a)

- Store stocks of CII-CV controlled substances in a securely locked, substantially constructed cabinet.

21 CFR 1301.75(b)

BEST PRACTICES

- Safe
- Alarm System
- Camera System
- Limit Access to Controlled Substances (including waste)



Disposal of Controlled Substance Inventory



Title 21 Code of Federal Regulations- PART 1317 — DISPOSAL



OPTIONS TO DISPOSE OF

[21 CFR 1317.05\(a\) and \(b\)](#)

- Prompt on-site destruction if proper method.
- Prompt delivery to a DEA registered reverse distributor by common carrier or reverse distributor pick-up.



RETURNED OR RECALLED

[21 CFR 1317.05\(a\) and \(b\)](#)

- Prompt delivery by common or contract carrier or pick-up at the registered location by:
 - Registrant from whom it was obtained.
 - Registered manufacturer of the substance.
 - Another registrant authorized by the manufacturer to accept returns or recalls on the manufacturer's behalf.



REQUEST ASSISTANCE- SPECIAL AGENT IN CHARGE

[21 CFR 1317.05\(a\) \(4\)](#)

Disposal of Controlled Substance Waste



DEA allows disposal of Controlled Substance waste if:

- It is authorized under your state's laws... and
- It is the remaining portion of used needles, syringes, or other injectable products in a practitioner environment

[21 CFR 1304.21\(e\)](#)





Disposal of Controlled Substances

**Registrants
authorized to collect
and authorized
collection activities
21 CFR 1317.40**

Authorized Collectors

Collection by registrants shall occur only at the following locations:

- (1) Those registered locations of manufacturers, distributors, reverse distributors, narcotic treatment programs, hospitals/clinics with an on-site pharmacy, and retail pharmacies that are authorized for collection; and
- (2) Long-term care facilities at which registered hospitals/clinics or retail pharmacies are authorized to maintain collection receptacles.

Individual practitioners, such as medical doctors, dentists, or veterinarians are not authorized to be collectors.





Prescriptions





Prescription Requirements

21 CFR 1306

- A controlled substance prescription must be issued by a DEA registered practitioner.
- A controlled substance prescription must be issued for a legitimate medical purpose.
- A controlled substance prescription must be issued in the usual course of professional practice.
- The signing of a prescription cannot be delegated.
- A prescription may not be written to obtain office stock for general dispensing.



Schedule II Prescriptions

21 CFR 1306.12

- No refills are authorized on Schedule II controlled substance prescriptions
- Allows for issuance of multiple prescriptions 21 CFR 1306.12(b)
- Prescriptions may be called in only in the case of an emergency situation 21 CFR 1306.11(d)





Schedule III-V Prescriptions

21 CFR 1306.21(a)

- Can be written or called in by the practitioner. A signed paper prescription can be faxed by the practitioner or his/her agent.
- Must contain the 12 elements mentioned earlier, plus refills if applicable.
 - The total quantity authorized, including the amount of the original prescription, does not exceed 5 refills nor extend beyond six months from the date of issue of the original prescription. 21 CFR 1306.22(e)
- In the case of an oral prescription, all of the information required by 21 CFR 1306.05 must be included with the exception of the practitioner's signature.

Dispensing



- **Dispenser:** An individual practitioner, institutional practitioner, pharmacy or pharmacist who dispenses a controlled substance: “21 CFR 1300.01 (b)”
- DEA number for each location if dispensing/administering: “21 CFR 1301.12 (a)”
- Only one DEA number needed per state if only prescribing: “21 CFR 1301.12 (b)(3)” (Some COVID flexibilities, please see www.dea diversion.usdoj.gov for latest COVID policies)





Dispensing / Administration

Administer / Dispensing Records “21 CFR 1304.22 (c)”

Recommend a log is kept, but can be in a patient chart

Required:

- 1) Name of Substance
- 2) Strength
- 3) Quantity
- 4) Patient name
- 5) Patient address
- 6) Date
- 7) Written or typed name or initials of the individual who dispensed or administered the substance on behalf of the dispenser





Exceptions

The Veterinary Medicine Mobility Act of 2014

21 U.S.C. 822(e)(2)



The **Veterinary Medicine Mobility Act of 2014** amended the CSA to address separate registration requirements for veterinarians. 21 U.S.C. 822(e)(2).

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.





Controlled Substance Ordering: DEA Form 222

21 CFR § 1305

- Used for the acquisition and distribution of Schedule I and II controlled substances **21 CFR 1305.03**
- Do not pre-sign any DEA Form 222/ Check POA for authorized signers
- Must be filled out completely and accurately
- (Purchaser) Make a copy to maintain for the registrant's records before submitting the original form to the supplier **21 CFR 1305.13**

DEA FORM-222 U.S. OFFICIAL ORDER FORMS - SCHEDULES I & II DRUG ENFORCEMENT ADMINISTRATION OMB APPROVAL No. 1117-0010

PURCHASER INFORMATION GREGORY HOUSE 2118 LAURIE LANE PRINCETON, NJ 08536		REGISTRATION INFORMATION REGISTRATION #: AH0509945 REGISTERED AS: PRACTITIONER SCHEDULES: II, III, IV, V ORDER FORM NUMBER: 18 DATE ISSUED: 08/10/2021		SUPPLIER DEA NUMBER# P B 1 2 3 4 5 6 3	
PART 1: TO BE FILLED IN BY PURCHASER TERRY OVERTON, REGULATORY COMPLIANCE OFFICER Print or Type Name and Title <i>Terry Overton</i> Signature of Requesting Official (must be authorized to sign order form) Date: 2/6/2022		PART 5: TO BE FILLED IN BY PURCHASER		PART 2: TO BE FILLED IN BY PURCHASER BINDLEY-WESTERN DRUG BUSINESS NAME 4219 W. 71ST STREET STREET ADDRESS INDIANAPOLIS, IN 46266 CITY, STATE, ZIP CODE	
PART 3: ALTERNATE SUPPLIER IDENTIFICATION (name in part 2) if order is endorsed to another supplier to fill: ALTERNATE DEA # Signature: by first supplier DATE		PART 4: TO BE FILLED IN BY SUPPLIER NATIONAL DRUG CODE NUMBER SHIPPED DATE SHIPPED			
ITEM	NO. OF PACKAGES	PACKAGE SIZE	NAME OF ITEM	NUMBER RECD	DATE RECD
1	400	100	Hydrocodone Bitartrate and Acet 10325mg tabs	35	2/7/22
2	5	900	Hydrocodone Bitartrate and Acet 10325mg tabs	5	2/7/22
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
3 LAST LINE COMPLETED (MUST BE 20 OR LESS)					



DRUG ENFORCEMENT ADMINISTRATION

Power of Attorney

21 CFR 1305.05(a)

- A Power of Attorney may be used to execute a DEA Form 222
- 21 CFR 1305.05(d) requires that a POA be signed by four (4) people
 - The Registrant
 - The Designated Power of Attorney
 - Two Witnesses



Ordering Schedules III-V Controlled Substances



Keep a receipt
(invoice or
packing slip) on
which it records
the date the
drugs were
received and
confirm that the
order is accurate.

21 CFR 1304.21(a) & (d)

Receipts must also contain the following information:

21 CFR 1304.22(c), 1304.22(a)(2)

Name of the substance

Must also contain the name of each controlled substance, the finished form, the number of dosage units of finished form in each commercial container, and the number of commercial containers ordered and received.

Must contain details of each registrant's DEA #, name, address.



Controlled Substance Ordering System (CSOS) Electronic Order Forms



- Only allowance for the electronic transmission of Schedule II Controlled Substance orders between controlled substance manufacturers, distributors, pharmacies, and other DEA authorized entities.
- Users must obtain a CSOS digital certificate for electronic ordering.
- Electronic orders must be signed **using a digital signature** issued by a Certification Authority (CA) run by the DEA.





What if I need to transfer controlled substances to another DEA registrant?

- Use a sales invoice for Schedules III-V - **21 CFR 1307.11 (a)(1)(ii)**
- Use a DEA Form-222 (C I & II) - **21 CFR 1307.11(a)(1)(iii)**
- Only allowed 5% of your yearly total - **21 CFR 1307.11(a)(1)(iv)**
- If you do more than 5%, you must register with DEA as a distributor - **21 CFR 1307.11(b)**



Registrant Inspections - Common Findings



- Lack of knowledge of software
- Dispensing logs not maintained
- Execution of DEA Form 222
- Lack of required physical inventories such as initial and biennial inventories
- No spill log (manual)
- Spill log (electronic) not accurate
- No checks and balances regarding spills
- Not properly reconciling
- Alarm systems not checked
- Power of Attorney and lack of revocations

- Controlled substance accountability
- Not counting everything on hand
- Take back of controlled substances
- Not notifying DEA of Drug Theft or Loss
- Ordering controlled substances from other entities outside of the closed system of distribution
- CSOS login and CSOS recordkeeping
- Lack of complete and accurate records



Controlled Substance Audit Procedures



Investigators will ask for and review all controlled substance records to perform an audit



Investigators witness a physical count conducted by you, the registrant, using your records



Investigators will audit several controlled substances, from different Schedules, over a predetermined period of time



If the audit reveals discrepancies, this could be an indication of incomplete and inaccurate recordkeeping practices and/or diversion

The audit indicates whether controlled substance records were complete, thus “maintained effective controls against diversion.”



Typical Records requested during Inspection



- List of Employees with Access to Controlled Substances (Name, Title, Address, DOB)
- Copies of Licenses and Certificates (other federal/state)
- Facility Floor Plan
- Receiving Records (222s, Invoices/purchase orders/packing slips, CSOS)
- Power of Attorney to order CII
- Dispensing/Distribution Records
- Records of Returns (Schedules II-V)
- Records of Destruction (DEA Form-41s, Waste Records, Reverse Distributor)
- Theft/loss reports (DEA Form-106)
- Copy of most recent biennial inventory (or initial inventory)
- Copy of alarm company contract
- List of Suppliers (Name, address, DEA #)



Potential Adverse Actions



Letter of Admonition



Memorandum of Agreement



Civil Fines



Order to Show Cause



Immediate Suspension Order



Criminal Prosecution





Trends to Watch For





Minimizing Drug Diversion

- Be thorough about documentation when dispensing controlled substances
- Restrict access to prescription pads & e-prescribing
- Maintain strict refill policy
- Look for signs of animal abuse during exam process
- Strictly control access, and regularly check inventory
- Remind clients to dispose of unused medications at a registered disposal site





Warning Signs “Vet-Shopping”

- New client has seriously injured animal with vague history
- Old, incomplete or missing records
- Describing clinical signs that are inconsistent with exam
- Refusing medications as prescribed and suggesting alternatives
- Requesting early prescription refills for lost or stolen medications
- Requesting medications while missing appointments
- Being insistent, uncooperative or aggressive in their behavior

Best Practices to prevent Drug Diversion



Strong Medication Management



- Well-defined policies & procedures at pharmacy
- Secure storage, controlled access, complete records

Staff Education and Training



- Diversion awareness training
- Culture of accountability and vigilance
- Investigating and reporting practices

Audits and Inventory Controls



- Regular audits of controlled substance records
- Utilizing technology to monitor and detect diversion

Secure Medication Storage and Disposal



- Implementing physical security measures
- Proper disposal methods

Help **STOP** Diversion of Prescription Medications



Anyone with information about suspected controlled substance diversion should report that to the Drug Enforcement Administration via our website DEAdiversion.usdoj.gov, or contact the DEA hotline at **1-877-792-2873** or your local DEA field office.





DEA Resources

DEA Diversion Control Division

<https://www.deadiversion.usdoj.gov>

The screenshot shows the homepage of the DEA Diversion Control Division website. At the top, there is a navigation bar with the DEA logo, contact information (DEA.Registration.Help@dea.gov, 1.800.882.9539), and a search icon. Below the navigation bar is a main banner with the text "Year Round Pharmaceutical Disposal" and "SEARCH FOR YEAR ROUND PHARMACEUTICAL DISPOSAL LOCATIONS". A button labeled "CLICK HERE TO GET STARTED!" is visible. The banner also features a map of the United States with red location pins and a "TAKEBACK" logo. Below the banner is a horizontal menu with four items: "REGISTRATION", "FORMS & APPLICATIONS", "CONTACT US", and "RESOURCES". A pink notification box contains a message about scheduled system maintenance on Friday, May 25, 2025, from 6:00 PM to Monday, May 28, 2025, at 8:00 AM (ET). Below the notification box is a search bar. The main content area is titled "Welcome" and features four tiles: "Registration", "Forms & Applications", "Questions & Answers", and "Meetings & Events". Each tile has a corresponding "Go to" link below it.

DEA.Registration.Help@dea.gov 1.800.882.9539

HOME ABOUT US REGISTRATION REPORTING RESOURCES CONTACT US

Year Round Pharmaceutical Disposal

SEARCH FOR YEAR ROUND PHARMACEUTICAL DISPOSAL LOCATIONS

CLICK HERE TO GET STARTED!

REGISTRATION FORMS & APPLICATIONS CONTACT US RESOURCES

Please be advised that a scheduled system maintenance will take place on Friday, May 25, 2025, 6:00 PM to Monday, May 28, 2025, 8:00 AM (ET). During this time, systems may be temporarily unavailable or experience intermittent disruptions.

One of our call centers is experiencing technical issues which may cause a delay. DEA asks for your patience as we work to resolve the issue.

Welcome

Registration Forms & Applications Questions & Answers Meetings & Events

Go to Registration > Go to Forms > Go to Q&A > Go to Meetings >

THANK YOU!!!!

Questions?

Policy related inquiries:

DPY@dea.gov

General inquiries:

DiversionHQ.Outreach@dea.gov

