

# DEA Compliance Checklist



Keeping Controlled Substances Under Control

**Purpose:** This checklist ensures your veterinary practice meets all DEA requirements for controlled substances (Schedule II-V). Review quarterly and document completion.

## 1. DEA REGISTRATION

- Registration Current:** Certificate displayed, renewal every 3 years.
- Correct Type:** Registered under appropriate DEA practitioner class (Schedule II-V).
- State License:** Current and linked to DEA registration. Changes reported within 30 days.
- Multi-Location:** Each practice location has separate DEA registration.

## 2. STORAGE REQUIREMENTS

- Locked Cabinet:** All CS stored in substantially constructed, securely locked cabinet or safe.
- Limited Access:** Only authorized personnel have keys/combination. Key control log maintained.
- Schedule II Separation:** Schedule II drugs stored separately from III-V (best practice).
- Environmental Controls:** Appropriate temperature/humidity. No theft or diversion risk.

## 3. RECORD-KEEPING

- Initial Inventory:** Completed when DEA registration obtained.
- Biennial Inventory:** Every 2 years (within 4 days of anniversary). Records kept 2 years.
- Daily Admin Records:** Date, patient/owner, drug, quantity, administering person logged.
- Ordering Docs:** DEA Form 222 (Sched II) or electronic records kept 2 years. III-V invoices retained.
- Disposal Records:** Waste documented with witness signatures. DEA Form 41 submitted.

## 4. ORDERING & RECEIVING

- Schedule II:** Ordered via DEA Form 222 or approved CSOS electronic system.
- Receipt Verification:** Deliveries verified against orders immediately. Discrepancies reported in 24hrs.
- Invoice Retention:** All invoices and packing slips retained minimum 2 years.

## 5. DISPOSAL PROCEDURES

- Authorized Method:** Reverse distributor, mail-back, or DEA take-back event.
- DEA Form 41:** Completed for all disposals. Copies maintained 2 years.
- Waste Witnessing:** All waste witnessed and co-signed by second authorized person.
- Expired Drugs:** Segregated, disposal initiated within 30 days of expiration.

## 6. THEFT & LOSS REPORTING

**CRITICAL:** Theft/significant loss must be reported to DEA within 1 business day using DEA Form 106.

- Incident Response Plan:** Written protocol for theft, loss, or diversion response.
- Form 106 Available:** Blank DEA Form 106 readily accessible.
- Law Enforcement:** Procedure to notify local LE in addition to DEA.

## 7. PRESCRIBING & DISPENSING

- VCPR Required:** Valid veterinarian-client-patient relationship before prescribing CS.
- Rx Requirements:** DEA #, patient, owner, drug/strength, qty, directions, refill auth.
- Schedule II:** No refills. New prescription required each time.
- Dispensing Records:** Qty, date, prescribing vet documented in medical record.

## 8. STATE-SPECIFIC REQUIREMENTS

- State CS Registration:** If required, separate state registration is current.
- PDMP Compliance:** State Prescription Drug Monitoring Program requirements met.
- Schedule Differences:** Aware of state vs. federal scheduling differences.
- Audit Preparedness:** Ready for state board of pharmacy or vet board CS audit.

## 9. STAFF TRAINING & ACCOUNTABILITY

- Initial Training:** All CS-handling staff trained on DEA requirements and procedures.
- Annual Refresher:** Yearly training on CS policies and procedures for all authorized staff.
- Access List:** Written list of authorized personnel, updated with staff changes.
- Accountability:** Inventory counts, dual-witness protocols, and surveillance in place.

## 10. AUDIT PREPAREDNESS

- Records Organized:** All records accessible for DEA inspection (orders, inventory, admin, disposal).
- Spot-Checks:** Periodic physical counts verify inventory matches logs.
- Discrepancy Process:** Written procedure for investigating inventory discrepancies.
- Mock Audit:** Internal audit at least annually to ensure compliance readiness.

**Review Date:** \_\_\_\_\_ **Reviewed By:** \_\_\_\_\_ **Deficiencies:** \_\_\_\_\_ **Actions:** \_\_\_\_\_

Complete this checklist quarterly. Document review date, deficiencies found, and corrective actions taken.

**Disclaimer:** Vet On It CE provides this checklist as a courtesy example derived from lecture materials. This document is for educational reference only and does not constitute veterinary medical advice or regulatory compliance guidance. Each veterinarian and practice must independently assess the completeness and suitability of this checklist relative to their specific practice, applicable DEA regulations, and state requirements. Vet On It CE makes no representations regarding the completeness or clinical applicability of this document.

© 2026 Vet On It CE | RACE Approved | Sponsor-Free Veterinary Education | Dr. Lauren Forsythe, PharmD, MBA, DICVP