

What exactly is CDS?

CDS is short for Controlled Dangerous Substances. They are drugs with increased potential for abuse, requiring stringent monitoring and control. CDS are scheduled drugs that are regulated by the Drug Enforcement Administration (DEA) and the Oklahoma Bureau of Narcotics & Dangerous Drugs (OBNDD). They are identified by a “C” with a roman numeral inside the “C” and is found on the label. The roman numeral indicates the schedule number of the drug.

What is the difference between CDS, dangerous drugs, prescription drugs and legend drugs?

CDS, again, are scheduled drugs regulated by DEA.

“Dangerous drugs”, “legend drugs” or “prescription drugs” are all the same. They are drugs labeled “Rx only”, “Caution: Federal law restricts this drug to use by or on the order of a licensed veterinarian”, or “Caution: Federal law prohibits dispensing without prescription”.

Am I required to have an OBNND certificate to administer or dispense CDS?

Yes. Every DVM administering or dispensing CDS and every CAET administering CDS is required to hold a current registration with OBNDD.

Note: You must first receive an OBN# before receiving a DEA#. If you plan to order and store CDS, you need a DEA. Otherwise, just an OBN.

Can I work under another DVM's DEA license and what restrictions am I under?

Yes, only if you **do not** prescribe or order CDS.

At least one DVM at a clinic must hold a current DEA registration. That DVM is responsible for ordering CDS and maintaining the required inventory and storage. He or she is also able to prescribe CDS. A DVM cannot prescribe or order CDS without your own DEA registration.

What if I work in two different locations?

If you order CDS and they are shipped to two different locations, you are required to have two DEA registrations. One for each location. OBNDD requires a separate registration if you are required to have a separate DEA registration.

If you work at two different locations and the CDS are ordered by another veterinarian (with his DEA registration), you will need only one OBNDD registration.

What kind of cabinet must I have to secure my CDS?

The cabinet must be substantially secured. It cannot be stored in something that can be picked up and carried off.

Certain controlled drugs like Telazol must be refrigerated. How do I secure it?

DEA advises having a locked box within the refrigerator to hold the CDS. We recommend having a lock installed on the refrigerator since locked box can be easily removed.

Who do I report to when I suspect diversion or discover theft?

You must report any theft of CDS to your local police department, OBN and DEA. A DEA Form 106 must be completed online at <https://www.deadiversion.usdoj.gov/webforms/dtlLogin.jsp> . As a courtesy, please also notify the Veterinary Board office.

When I receive CDS shipments, must I keep the invoices?

Yes. Invoices should be kept in a readily retrievable location for at least 2 years.

What is a CDS Biennial inventory?

A CDS biennial inventory is an inventory of your CDS on hand performed every two years. This is required by DEA and OBN. You can use the computer program or log book you already have in place as long as it contains the required information.

What are CDS dispensing records and what must be recorded?

CDS dispensing records is a readily retrievable log.

The required information includes:

- Date of acquisition

- Quantity purchased

- Date administered, dispensed or prescribed

- Quantity administered, dispensed or prescribed

- Name of client & patient receiving the drug

- Diagnosis

- Name or initials of the doctor dispensing or administering

What are DEA 222 Forms?

DEA Form 222 is required by DEA (and issued by DEA) to order Schedule I & II drugs. The supplier must have this special order form from the registrant.

How long must I keep CDS records and/or my patient records?

There are several different agencies with different requirements. Our agency requires you maintain the records for 3 years unless your records contain prescription drug information. Those records must be kept for 5 years.

Five years is the longest required time with any regulating agency so it is our recommendation that all records be kept for 5 years to avoid any confusion.