



# Massachusetts DEA Information

State-Specific Controlled Substance Requirements | Presented to you by [www.reliefover.com](http://www.reliefover.com)

TOPIC	DETAILS
PMP	<p>veterinarians are excluded from MassPAT and all requirements reporting and use requirements.</p> <p>If you have a licensed pharmacy with a pharmacist you register.</p>
State License/MSCR	<p>In MA veterinarians must register with <u>MCSR</u> before registering with the DEA.</p> <p>Each individual vet in MA must have his/her own MCSR which shall be renewed annually as well as a DEA registration for schedule II-VI.</p> <p><a href="https://www.mass.gov/mcsr-for-individuals">https://www.mass.gov/mcsr-for-individuals</a></p> <p>If a practitioner does not plan on registering to use DEA scheduled CS's and only plans to work with MA schedule VI CS's they only need to obtain an MCSR.</p>
Recordkeeping	<p>While the DEA requires two years, MA requires patient records to be kept 4 years from the last contact with the animal; therefore you must adhere to the four-year requirements.</p>
Biennial Inventory	<p>Every two years following the date on which either the Federal or State initial inventory was taken</p>
State Controlled Substance Schedule VI	<p>Massachusetts considers all prescriptions not listed as a federally scheduled controlled substance a schedule VI drug in the state. This includes, penicillin, azithromycin, metoprolol, simvastatin, lisinopril, gabapentin, levothyroxine, metformin, Acepromazine etc.</p> <p><a href="https://malegislature.gov/laws/generallaws/parti/titlexv/chapter94c/section3">https://malegislature.gov/laws/generallaws/parti/titlexv/chapter94c/section3</a></p> <p>In inventory/storage, schedule VI controlled substances must be segregated out from federally controlled substances (this could be a separate bin or shelf inside of secure storage as long as it is clearly separated out from federal controlled substances).</p>
Gabapentin	<p>Gabapentin: MA requires mandated gabapentin PMP reporting. While the FDA has NOT changed the schedule of Gabapentin, the Commonwealth of Massachusetts has added it to the list of drugs that must be reported to MASSPAT. It <u>does apply</u> to a veterinary practitioner dispensing Gabapentin.</p> <p>In inventory/storage, gabapentin must be segregated out from federally controlled substances since it is only scheduled at the state-level (this could be a separate bin or shelf inside of secure storage as long as it is clearly separated out from federal controlled substances).</p> <p><a href="https://www.mass.gov/doc/pmp-data-submission-dispenser-guide-version-40-0/download">https://www.mass.gov/doc/pmp-data-submission-dispenser-guide-version-40-0/download</a></p>



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Dispensing	Massachusetts defines “dispenser” as a practitioner who dispenses, including veterinarians in the definition of “practitioner” or “dispenser” (with a reporting exception for a veterinarian who dispenses at the animal clinic or hospital instead of sending the prescription to a retail pharmacy).
Prescriptions	<p>A MA veterinary clinic cannot act as a drug supplier for other veterinarians.</p> <p>At the request of a client an MA veterinarian shall provide prescription to the pharmacy of choice. A licensee shall provide prescription information to an off-site pharmacy or a written prescription to the client if requested. The prescription may be written or transmitted by any electronic means at the discretion of the prescribing licensee and in accordance with M.G.L. c. 94C.</p> <p>Prescriptions for schedule II -V drugs require a DEA number but not for schedule VI medications. <a href="https://www.mass.gov/policy-advisory/board-policies-and-guidelines-veterinary-medicine">https://www.mass.gov/policy-advisory/board-policies-and-guidelines-veterinary-medicine</a></p>
Telemedicine	No existing laws.
VCPR	<p><u>Veterinarian-client Patient Relationship (VCPR)</u> exists when:</p> <ol style="list-style-type: none"><li>The Veterinarian has assumed the responsibility for making clinical judgments regarding the health of the patient and the client has agreed to follow the Veterinarian's instructions;</li><li>The Veterinarian has sufficient knowledge of the patient to initiate at least a general or preliminary diagnosis of the medical condition of the patient This means that the Veterinarian and/or his or her Veterinary Practice is acquainted with the keeping and care of the patient by virtue of a timely examination of the patient by the Veterinarian and/or his or her Veterinary Practice, or medically appropriate and timely visits by the Veterinarian and/or his or her Veterinary Practice to the operation where the patient is managed; and The Veterinarian is readily available for follow-up evaluation or has arranged for the following: veterinary emergency coverage and continuing care and treatment.</li><li>The VCPR shall extend to associate Veterinarians within the same practice. (256 CMR. 2.01)</li></ol> <p>A licensee shall dispense or prescribe controlled substances only in the course of his or her professional practice after establishing a genuine veterinarian-client patient relationship (256 CMR 7.01).</p>
CE	<p>Veterinarians: Licensed Veterinarians are required to complete a minimum of 15 continuing education credits per calendar year to renew a license. All credits can be obtained online but at least 9 must be "interactive" (instruction occurs live in real time and interaction occurs between the instructor and licensee). 6 online credits can be "non-interactive" (pre-recorded for home study).</p> <p><u>Vet CE</u></p> <p>Vet Techs: 12 CE hours per year via MVTA – Accepts 12 hours of Online CE Courses. Accepts RACE Approved Courses and MVTA Approved Courses. <a href="https://www.massvta.org/ce-guidelines">https://www.massvta.org/ce-guidelines</a></p>



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## FEDERAL:

Drug Enforcement Administration, New England Division  
15 Sudbury St, Boston, MA 02203  
Phone: (617) 557-2100

## Local DEA Offices:

- Cape Cod - (508) 996-4805
- New Bedford - (508) 996-4805
- Springfield - (413) 306-6920

Federal Law: [www.dea.gov](http://www.dea.gov)

Controlled Substances Act: [21 USC 801 – 904](#)

Code of Federal Regulations: [21 CFR Part 1300 – 1399](#)

NDC drug: [www.fda.gov/Drugs/DevelopmentApprovalProcess/UCM070829](http://www.fda.gov/Drugs/DevelopmentApprovalProcess/UCM070829)

Diversion Control Division: <https://www.dea.gov/schedules/>

## STATE:

Massachusetts Veterinary Licensing Board website:

<https://www.mass.gov/orgs/board-of-registration-in-veterinary-medicine>

Massachusetts Pharmacy Board website:

<https://www.mass.gov/orgs/board-of-registration-in-pharmacy>

Massachusetts Law: <https://malegislature.gov/Laws/GeneralLaws/PartI/TitleXV/Chapter94C>