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Drug Purchases

As an animal-control unit registered by the Colorado State Board of Pharmacy Board (the Board), you may **only** procure your prescription drug and controlled substance stocks from a business that is also registered by the Board. In this instance, you must purchase drug stocks from either a registered In-State or Out of State Prescription Drug Wholesaler. It is very important to assure that such drugs are only procured from a wholesaler that is registered by the Board.

Before making any drug purchase, please verify the registration of the distributing wholesaler by visiting ALISON (Automated Licensure Information System Online) at <https://www.doradls.state.co.us/alison.php>. Within this system, you can verify a registration under the "companies" option.

Retrievability of Records

Pursuant to Board Regulation 16.00.60, the following records shall be maintained on the premises of the Limited License Facility and be available for inspection by the Board or its inspectors immediately upon request:

1. All DEA 222 Forms executed during the two years preceding the request.
2. All inventories of controlled substances required to be taken during the two years preceding the request.
3. All records of administration, receipt, credit, distribution, loss, surrender or disposal in any other manner of prescription drugs and controlled substances during the two years preceding the request.
4. Records of receipt of Schedule II controlled substances shall be maintained separately from all other records. Invoices detailing receipt of Schedule III-V controlled substances may be maintained with other records of receipt, but they shall be readily identifiable from records of receipt of non-controlled drugs.
5. Any unexecuted DEA 222 Form shall be available for inspection within two business days or 48 hours of request by the Board or its inspectors.

If an inspector requests a specific record, records shall be maintained in such a manner to allow immediate retrieval. An inspector may give a Limited License Facility up to 48 hours to retrieve requested records.

Correctly Completing the DEA Form 222

A DEA Form 222 is used when ordering Schedule II controlled substances. The forms are prepared in triplicate by means of interleaved carbon sheets that are part of the Form 222. Copies 1 and 2 are submitted to the supplier, and Copy 3 is retained by the purchaser. Only one item, consisting of one or more commercial or bulk containers of the same item, may be entered on each numbered line. The number of lines completed must be noted on the bottom of the form. Each DEA Form 222 must be signed and dated by a person authorized to sign an application for registration, or a person granted power of attorney to sign a Form 222. When the items are received from the supplier, the purchaser must record (on Copy 3) the number of commercial or bulk containers received and the date of receipt. This form should be attached to the corresponding invoice, and maintained on the premises of the registered Limited License Facility for inspection for a period of not less than two years from the date the drugs were received. Invoices detailing receipt of Schedule II substances shall be maintained separately from all other records.

Relocation

In the event you relocate your animal-control unit, it is important to take two very important steps at least six weeks prior to your move.

Complete and submit a "Limited License Application" to the Board. This application can be viewed and printed at <http://www.dora.state.co.us/pharmacy/bus/limitedlicense.htm>. The application provides you with the option to relocate your existing registered outlet. Your outlet's relocation **must** be communicated to the Board by use of this application.

Contact the Rocky Mountain Division of the Drug Enforcement Administration at (303) 705-7300 or visit the DEA's website at www.deadiversion.usdoj.gov. As a DEA registrant, you will also need to complete a **separate** application with that agency detailing your relocation.

While these steps may seem to be an unnecessary regulatory requirement, there are very practical and important reasons for them. For example, your drug supplier(s) may only deliver to the location that is currently registered by the Board. If you fail to maintain the actual location with the Board, the drug supply for your facility is likely to be interrupted.

Drug Supplies at a Limited License Facility

Colorado law allows facilities registered as Limited Licenses to purchase, possess, and administer drugs that are medically recognized for euthanasia or that are used for chemical capture or to sedate or immobilize pet animals immediately prior to euthanasia.

The drugs that a Limited License Facility may purchase, possess, or administer for any of these purposes are as follows:

- a. Acepromazine
- b. Ketamine
- c. Xylazine
- d. Tiletamine and Zolazepam
- e. Sodium Pentobarbital (alone or in combination with other drugs that are medically recognized for euthanasia)

The inspectors from the Board will check that your inventory only contains the medications listed above. These are the only drugs that your facility may purchase, possess, or administer using the facility's Limited License registration.

