



Guidance Document: Controlled Substance Inventory Requirements

[Ohio Administrative Code Rule 4729-9-14](#) requires each prescriber or terminal distributor of dangerous drugs to take inventory of all stocks of controlled substances on hand **every year** following the date on which the initial inventory is taken. This is a change from the previous version of the rule that required a controlled substance inventory every two years.

Please be advised that the rule still requires each inventory must contain a complete and accurate record of all controlled substances on hand on the date the inventory is taken, including:

- The name of the substance.
- The total quantity of the substance, including:
 - Each finished form (e.g., ten-milligram tablet or ten-milligram concentration per fluid ounce or milliliter).
 - The number of units or volume of each finished form in each commercial container (e.g., one-hundred-tablet bottle or ten-milliliter vial).
 - The number of commercial containers of each such finished form (e.g., three one-hundred-tablet bottles or ten one-milliliter vials).
- If the substance is listed in schedule I or II, the prescriber or terminal distributor of dangerous drugs must make an exact count or measure of the contents. **Please note effective October 6, 2014, hydrocodone containing products are schedule II controlled substances.**
- If the substance is listed in schedule III, IV, or V, the prescriber or terminal distributor of dangerous drugs may make an estimated count or measure of the contents, unless the container holds more than one thousand tablets or capsules in which an exact count of the contents must be made. **Please note effective August 18, 2014, tramadol is now a schedule IV controlled substance.**
- A separate inventory must be made for each place or establishment where controlled substances are in the possession or under the control of the prescriber or terminal distributor. Each inventory for each place or establishment shall be kept at the place or establishment.
- All inventory records must be kept for a period of three years at the place where the controlled substances are located.

In addition to the annual inventory requirements, the United States Drug Enforcement Administration also requires a controlled substance inventory every two years. For more information on these requirements, please visit:

http://www.deadiversion.usdoj.gov/pubs/manuals/pharm2/pharm_manual.htm#7

