



## Terminal Distributor Licensure of Office-Based Opioid Treatment

**Updated 8/24/2023**

Effective October 3, 2023, [section 4729.553 of the Ohio Revised Code](#), which requires any location where a prescriber is treating more than thirty individuals for opioid dependence or addiction using a controlled substance to obtain a license as a terminal distributor of dangerous drugs with an office-based opioid treatment (OBOT) classification, will be repealed.

In preparation for the repeal of this section, the Board issued the following resolution on July 11, 2023:

*With the signature of HB 33, the Board hereby finds it in the public's interest to waive the requirements for licensure as follows:*

- *An office-based opioid treatment facility licensed in accordance with section 4729.553 of the Revised Code.*

**With the repeal of the law and the passage of this resolution, the Board is no longer accepting applications for terminal distributors of dangerous drugs with an office-based opioid treatment classification.**

**IMPORTANT: There may be facilities that hold a license as a terminal distributor of dangerous drugs (TDDD) with an office-based opioid treatment classification that may still need a terminal distributor of dangerous drugs license from the Board of Pharmacy to comply with Ohio law (e.g., the facility possesses drugs on-site). Licensees should**

**review the following frequently asked questions included in this document for more information.**

If you need additional information, the most expedient way to have your questions answered will be to e-mail the Board office: [contact@pharmacy.ohio.gov](mailto:contact@pharmacy.ohio.gov). To ensure prompt review, make sure to include the phrase “OBOT” and your TDDD license number in the subject header of the email.

## **Frequently Asked Questions**

### **Do I need to maintain my terminal distributor license?**

The answer to this question depends on if the clinic or facility meets other criteria for licensure. For example, if a clinic possesses long-acting injectable buprenorphine on-site (e.g., Sublocade, Brixadi, etc.), it will still need to maintain a TDDD. For more information on the requirements, please visit the Board’s prescriber practice licensing document: [www.pharmacy.ohio.gov/prescriberTDDD](http://www.pharmacy.ohio.gov/prescriberTDDD).

Clinics that currently hold a terminal distributor of dangerous drugs license with an office-based opioid treatment classification that no longer need a license, should submit a discontinuation of business form: [www.pharmacy.ohio.gov/DCB](http://www.pharmacy.ohio.gov/DCB).

**Clinics that still require a terminal distributor of dangerous drugs license (e.g., drugs onsite, etc.) will not have to do anything. Rather, these licenses will be automatically converted from a classification of “Terminal - Office-Based Opioid Treatment - Category 3” to “Terminal - Clinic - Category 3” after October 3, 2023.**

If you need additional information, the most expedient way to have your questions answered will be to e-mail the Board office: [contact@pharmacy.ohio.gov](mailto:contact@pharmacy.ohio.gov). To ensure prompt review, make sure to include the phrase “OBOT” and your TDDD license number in the subject header of the email.

### **I have buprenorphine on site. Do I need a TDDD license?**

Yes. A TDDD (Category 3) license is required if a clinic maintains **ANY** controlled substances on site (including patient-specific medications for administration).

Clinics that still require a terminal distributor of dangerous drugs license (e.g., drugs on-site, etc.) will not have to do anything. Rather, these licenses will be automatically converted from a classification of “Terminal - Office-Based Opioid Treatment - Category 3” to “Terminal - Clinic - Category 3” after October 3, 2023.

These clinics should adhere to the Clinic and Prescriber Office Inspection Guide:

[www.pharmacy.ohio.gov/CPOinspect](http://www.pharmacy.ohio.gov/CPOinspect)

### **Do I still need a TDDD license to administer buprenorphine in my office (e.g., office acting as a pick-up station)?**

Yes. For a pharmacy to dispense patient-specific buprenorphine to your office, you will need to maintain a TDDD license (Terminal – Clinic – Category 3).

### **Do I still need to conduct a background check on employees prior to hiring?**

No. Effective July 11, 2023, Board of Pharmacy requirements to obtain employee background checks for a terminal distributor of dangerous drugs with an office-based opioid treatment classification are hereby suspended. Licensees regulated by other state and federal agencies should consult their respective licensing agencies for any additional background requirements.

### **For More Information**

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