Responsible Person Requirements for Licensure

Updated 7/15/2026

To access the Responsible Person (RP) qualifications resolution, visit: www.pharmacy.ohio.gov/RP.

What is a Responsible Person (RP)?

Every license issued to a terminal distributor or drug distributor (hospital, pharmacy, wholesaler, clinic, manufacturer, EMS, lab, etc.) by the Ohio Board of Pharmacy requires there to be a responsible person (RP). The RP ensures the licensee is compliant with all applicable state and federal laws, regulations, and rules governing the distribution of dangerous drugs. This includes supervision and control of dangerous drugs, security and control of dangerous drugs, and maintaining all drug records otherwise required. Home Medical Equipment Service Providers have similar requirements for designated representatives.

A terminal distributor or drug distributor must have an RP at all times. When there is a change of RP, the Board must be notified **within ten days** of the effective date of the appointment of the new RP. This requires the submission of a Change of Responsible Person Request in eLicense Ohio and the payment of a $15.00 processing fee.

IMPORTANT: For any change of RP, a complete inventory shall be taken of the controlled substances on site by the new responsible person. For more information see OAC 4729:5-2-01 [E][3] & OAC 4729:6-2-01 [C]. This requirement applies to licensees that are permitted to order and possess controlled substances (even if no controlled drugs on-site). For more information, visit: www.pharmacy.ohio.gov/inventory.

To assist licensees in complying with the RP requirements, the Ohio Board of Pharmacy developed this guidance document. This document is divided into two parts:

- **Section 1: Terminal Distributor Responsible Person Requirements**
- **Section 2: Drug Distributor* Responsible Person Requirements**

77 S. High Street, 17th Floor
Columbus, OH 43215 U.S.A.

Phone: 614 | 466 4143
Fax: 614 | 752 4836

988 SUICIDE & CRISIS LIFELINE Ohio

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***REMINDER:** A distributor of dangerous drugs includes the following license types: manufacturer of dangerous drugs, outsourcing facility, third-party logistics provider, repackager of dangerous drugs, and wholesale distributor of dangerous drugs (includes broker and virtual wholesaler).

For More Information

For questions regarding these requirements, please review the following guidance document. If you need additional information, the most expedient way to have your questions answered will be to e-mail the Board office by visiting: http://www.pharmacy.ohio.gov/contact.aspx.

Section 1: Responsible Person (RP) Requirements for Terminal Distributors of Dangerous Drugs

*This section of the guidance document applies to upcoming changes to OAC 4729:5-2-01 (Effective February 1, 2027). For the current requirements, please review the **version** of the rule in effect until February 1, 2027.*

Effective February 1, 2027, OAC 4729:5-2-01 will require a RP for a terminal distributor to meet specific hourly on-site requirements or conduct regular site visits to ensure compliance with all applicable state and federal laws, regulations, and rules governing the distribution of dangerous drugs. ***Licensees are strongly encouraged to utilize this implementation window to ensure they can comply with the new requirements effective February 1, 2027.***

To assist licensees, the Board developed the following quick reference tables that outline the new RP requirements:

- Outpatient Pharmacy (In-State)
- Institutional Pharmacy (In-State)
- Non-Resident Pharmacies
- Non-Resident Terminal Distributors (Non-Pharmacy)
- Pain Management Clinics
- Emergency Medical Services
- All Other TDDDS (Med Spas, Clinics, First-Aid, OTPs, Veterinarians, etc.)

Outpatient Pharmacy (In-State)	
Requirements Effective February 1, 2027	
RP (Pharmacist) On-Site Supervision Requirements (OAC 4729:5-2-01[A])	▪ If open/operational 40+ hours, 20 hours per week.* **-OR-** ▪ If open/operational less than 40 hours, 50% of the time the pharmacy is open.* **Exception for authorized leave. Authorized leave includes a scheduled vacation, illness, federal or state holiday, or temporary leave of absence lasting no more than 31 calendar days.* **NOTE:** Any absence of the RP from the terminal distributor that exceeds 31 days requires the designation of a new responsible person.
RP Serving on Multiple Licenses (OAC 4729:5-2-01[A])	Limits RPs to two outpatient pharmacies[+], if the following conditions are met: 1. Meet the hourly requirements (see above). 2. The pharmacies have not been disciplined in the past 12 months for theft or significant loss. 3. There have been no minimum standards violations in the past 12 months. 4. Neither of the pharmacies are open/operational more than 20 hours per day (e.g., no 24-hour stores). 5. The proposed RP has been licensed to practice in Ohio for at least one year.

	6. The proposed RP is not on probation or otherwise restricted from serving as the RP on multiple licenses. [+]*Exceptions for remote dispensing pharmacies (see OAC 4729:5-18-02) and if temporarily approved by the Board's Executive Director in the event of death, incapacity, emergency medical leave (does not include planned medical leave), unexpected resignation, or discharge of the RP (see OAC 4729:5-2-01[A][7]).* *Temporary approval can be requested by submitting the **RP Temporary Approval Form** (**NOTE:** This form will be made available in January 2027).*
RP Qualifications	Ohio licensed pharmacist
Previous Discipline or Criminal Conviction (OAC 4729:5-2-01[I])	Subject to waiver by the Board (see OAC 4729:5-2-01 (I)). For questions, visit: https://www.pharmacy.ohio.gov/contact.

Institutional Pharmacy (In-State) – Includes Hospital Outpatient Pharmacies	
Requirements Effective February 1, 2027	
RP (Pharmacist) On-Site Supervision Requirements (OAC 4729:5-2-01[B])	▪ If open 40+ hours, 20 hours per week.* **-OR-** ▪ If open less than 40 hours, 50% of the time the pharmacy is open.* **-OR-** ▪ Conduct an on-site, in-person visit of the pharmacy where they serve as the RP on a quarterly basis. The pharmacy must be on campus or directly adjacent [e.g., one mile] to campus. This site visit must be documented. A ***sample site visit form*** will be made available in August 2026. **Exception for authorized leave. Authorized leave includes a scheduled vacation, illness, federal or state holiday, or temporary leave of absence lasting no more than 31 calendar days.* **NOTE:** Any absence of the RP from the terminal distributor that exceeds 31 days requires the designation of a new responsible person.
RP Serving on Multiple Licenses (OAC 4729:5-2-01[B])	Limits RPs to two institutional pharmacies[+] (including outpatient institutional), if the following conditions are met: ▪ Both locations are located on a campus as defined in rule 4729:5-1-01 of the Administrative Code; and ▪ The pharmacist is not currently on probation or is otherwise restricted

	from serving as the RP on multiple licenses pursuant to a settlement agreement or order of the Board. [+]*Exceptions for remote dispensing pharmacies (see OAC 4729:5-18-02) and if temporarily approved by the Board's Executive Director in the event of death, incapacity, emergency medical leave (does not include planned medical leave), unexpected resignation, or discharge of the RP (see OAC 4729:5-2-01[B][6]).* *Temporary approval can be requested by submitting the **RP Temporary Approval Form** (**NOTE:** This form will be made available in January 2027).*
Contingency Stock (OAC 4729:5-2-01[B][7])	The on-site supervision and limitations on pharmacists serving on multiple pharmacy licenses does not apply to terminal distributors of dangerous drugs with a pharmacy supplied contingency stock classification. An institutional pharmacy shall develop and implement policies and procedures on the management of pharmacy supplied contingency stock to ensure compliance with the requirements of Chapter 4729 of the Revised Code and all applicable rules adopted thereunder.
RP Qualifications	Ohio licensed pharmacist

Previous Discipline or Criminal Conviction (OAC 4729:5-2-01[I])	Subject to waiver by the Board (see OAC 4729:5-2-01 (I)). For questions, visit: https://www.pharmacy.ohio.gov/contact.

Non-Resident Pharmacies	
Requirements Effective February 1, 2027	
RP (Pharmacist) On-Site Supervision Requirements (OAC 4729:5-2-01[C][1])	Must comply with the supervision requirements of the licensee's home state. Any absence of the RP from the terminal distributor that exceeds 31 days requires the designation of a new responsible person.
RP Serving on Multiple Licenses (OAC 4729:5-2-01[C][1])	Limits RPs to one non-resident pharmacy, unless the non-resident pharmacies are located on a campus[#] as defined in section 4729:5-1-01 of the Administrative Code. [#]*"Campus," as used to describe a type of terminal distributor of dangerous drugs license issued pursuant to section 4729.54 of the Revised Code, means an establishment or place consisting of multiple buildings where dangerous drugs are stored that are located on a contiguous plot of land. All such buildings and stocks of dangerous drugs shall be under common ownership and control.*
Contingency Stock (OAC 4729:5-2-01[B][7])	The on-site supervision and limitations on pharmacists serving on multiple pharmacy licenses does not apply to terminal distributors of dangerous drugs with a pharmacy supplied contingency stock classification. An institutional pharmacy shall develop and implement policies and procedures on the management of pharmacy supplied contingency stock to ensure compliance with

	the requirements of Chapter 4729 of the Revised Code and all applicable rules adopted thereunder.
RP Qualifications	The pharmacist serving as the RP must hold a valid Ohio pharmacist license. For more information on applying for an Ohio Pharmacist license via reciprocity, visit: www.pharmacy.ohio.gov/reciprocity.
Previous Discipline or Criminal Conviction (OAC 4729:5-2-01[I])	Subject to waiver by the Board (see OAC 4729:5-2-01 (I)). For questions, visit: https://www.pharmacy.ohio.gov/contact.

Non-Resident Terminal Distributors (Non-Pharmacy)	
Requirements Effective February 1, 2027	
RP (Pharmacist/Prescriber) On-Site Supervision Requirements (OAC 4729:5-2-01[C][2])	Must comply with the supervision requirements of the licensee's home state. Any absence of the RP from the terminal distributor that exceeds 31 days requires the designation of a new responsible person.
RP Serving on Multiple Licenses (OAC 4729:5-2-01[C][2])	Limits RPs to one non-resident terminal distributor of dangerous drugs, unless the non-resident terminal distributors are located on a campus[#] as defined in section 4729:5-1-01 of the Administrative Code. [#]*"Campus," as used to describe a type of terminal distributor of dangerous drugs license issued pursuant to section 4729.54 of the Revised Code, means an establishment or place consisting of multiple buildings where dangerous drugs are stored that are located on a contiguous plot of land. All such buildings and stocks of dangerous drugs shall be under common ownership and control.*
RP Qualifications	Ohio licensed pharmacist or prescriber. For more information, see the Board's Responsible Person Resolution Qualifications document. For more information on applying for an Ohio Pharmacist license via reciprocity visit: www.pharmacy.ohio.gov/reciprocity.

Previous Discipline or Criminal Conviction (OAC 4729:5-2-01[I])	Subject to waiver by the Board (see OAC 4729:5-2-01 (I)). For questions, visit: https://www.pharmacy.ohio.gov/contact.

Pain Management Clinics (PMCs)	
Requirements Effective February 1, 2027	
RP On-Site Supervision Requirements (OAC 4729:5-2-01[D])	Work a minimum of eight hours per week at the pain management clinic where the physician serves as the RP, except when absent due to authorized leave*. **Authorized leave includes a scheduled vacation, illness, federal or state holiday, or temporary leave of absence lasting no more than 31 calendar days.* Any absence of the RP from the PMC that exceeds 31 days requires the designation of a new responsible person.
RP Serving on Multiple Licenses (OAC 4729:5-2-01[D])	Must meet the weekly hour requirements listed above for each licensed location.
RP Qualifications (OAC 4729:5-2-01[D][4])	Hold current subspecialty certification in pain management by the American Board of Medical Specialties or hold a current certificate of added qualification in pain management by the American Osteopathic Association Bureau of Osteopathic Specialists. **-OR-** Hold current subspecialty certification in hospice and palliative medicine by the American Board of Medical Specialties or hold a current certificate of added qualification in hospice and palliative medicine by the American Osteopathic Association Bureau of Osteopathic Specialists. **-OR-**

	Hold current board certification by the American Board of Pain Medicine. **-OR-** Hold current board certification by the American Board of Interventional Pain Physicians. **-OR-** Meet both of the following: (i) Hold current board certification in anesthesiology, psychiatry, neurology, physical medicine and rehabilitation, occupational medicine, or rheumatology by the American Board of Medical Specialties or hold current primary certification in anesthesiology, psychiatry, neurology, physical medicine and rehabilitation, occupational medicine, or rheumatology by the American Osteopathic Association Bureau of Osteopathic Specialists; **-AND-** (ii) Demonstrate conformance with the minimal standards of care in accordance with rule 4731-29-01 of the Administrative Code.
Previous Discipline or Criminal Conviction (OAC 4729:5-2-01[I])	Subject to waiver by the Board (see OAC 4729:5-2-01 (I)). For questions, visit: https://www.pharmacy.ohio.gov/contact.

Emergency Medical Service (EMS) Organization	
Requirements Effective February 1, 2027	
RP On-Site Supervision Requirements (OAC 4729:5-2-01[E])	▪ Work a minimum of twenty hours per week at the location except when absent due to authorized leave*; **-OR-** ▪ Conduct an on-site, in-person visit of the terminal distributor where they serve as the RP on a quarterly basis. This site visit must be documented. A ***sample site visit form*** will be made available in August 2026. **Authorized leave includes a scheduled vacation, illness, federal or state holiday, or temporary leave of absence lasting no more than 31 calendar days.*
RP Serving on Multiple Licenses (OAC 4729:5-2-01[E])	Must meet the weekly hour or quarterly site visit requirements for each location listed above.
RP Qualifications (OAC 4729:5-2-01[E][1])	Only the following may be the RP for an EMS organization: ▪ A physician licensed in accordance with Chapter 4731 of the Revised Code; ▪ A pharmacist licensed in accordance with Chapter 4729 of the Revised Code; or ▪ A paramedic or advanced emergency medical technician issued a certificate to practice in accordance with Chapter 4765 of the Revised Code.

Medical Director Requirements (OAC 4729:5-2-01[E][2])	If the RP is a physician licensed in accordance with Chapter 4731 of the Revised Code, that individual may also serve as EMS organization's medical director pursuant to Chapter 4729:5-14 of the Administrative Code. If the RP is not a physician, the EMS organization shall designate a medical director that meets the requirements of Chapter 4729:5-14 of the Administrative Code.
Previous Discipline or Criminal Conviction (OAC 4729:5-2-01[I])	Subject to waiver by the Board (see OAC 4729:5-2-01 (I)). For questions, visit: https://www.pharmacy.ohio.gov/contact.

All Other TDDDS (Med Spas, Clinics, First-Aid, Non-Limited, OTPs, etc.)	
Requirements Effective February 1, 2027	
RP On-Site Supervision Requirements (OAC 4729:5-2-01[F])	▪ Work a minimum of eight hours per month at the location licensed as a terminal distributor of dangerous drugs where they serve as the responsible person, except when absent due to authorized leave.* **-OR-** ▪ Conduct an on-site, in-person visit of the terminal distributor where they serve as the responsible person on a quarterly basis. This site visit must be documented. A ***sample site visit form*** will be made available in August 2026. **-OR-** ▪ For terminal distributors owned and operated by an institutional facility, conduct an on-site, in-person visit of the terminal distributor by a pharmacist employed by the institutional facility on a quarterly basis. This site visit must be documented and results shared with the RP. A ***sample site visit form*** will be made available in August 2026. **Authorized leave includes a scheduled vacation, illness, federal or state holiday, or temporary leave of absence lasting no more than 31 calendar days.*
RP Serving on Multiple Licenses (OAC 4729:5-2-01[F])	Must meet the monthly hour or quarterly site visit requirements for each location listed above.

RP Qualifications (OAC 4729:5-2-01[H][7])	Pursuant to OAC 4729:5-2-01, the Ohio Board of Pharmacy is required to adopt a resolution providing the credential types or qualifications required for the RP of each classification of terminal distributor of dangerous drugs and drug distributor license. Unless otherwise noted, only individuals that hold the credentials specified by an Ohio licensing authority (board or commission) may be the RP for that classification type. This resolution can be found here: www.pharmacy.ohio.gov/RP. **NOTE:** A RP shall hold a valid Ohio license, registration, or certification from an occupational licensing board as defined in section 4798.01 of the Revised Code. This requirement does not apply to terminal distributors of dangerous drugs that do not require the responsible person to hold a professional license, registration, or certification in accordance with the resolution issued by the Board.
Previous Discipline or Criminal Conviction (OAC 4729:5-2-01[I])	Subject to waiver by the Board (see OAC 4729:5-2-01 (I)). For questions, visit: https://www.pharmacy.ohio.gov/contact.

Section 2: Drug Distributor Responsible Person Requirements

This section of the guidance document applies to OAC 4729:6-2-01 (Effective April 25, 2022).

To assist licensees, the Board developed the following quick reference table that outlines the Board's current RP requirements for drug distributors:

Drug Distributors (Wholesaler, 3PL, Outsourcing Facility, Manufacturer, etc.)	
Requirements Effective April 25, 2022	
RP On-Site Supervision Requirements (OAC 4729:6-2-01 [E])	The RP shall be physically present at the location for a sufficient amount of time to provide supervision and control of dangerous drugs on-site.
RP Serving on Multiple Licenses	No prohibition or limitation.
RP Qualifications (OAC 4729:6-2-01 [F])	Pursuant to OAC 4729:6-2-01, the Ohio Board of Pharmacy is required to adopt a resolution providing the credential types or qualifications required for the RP of each classification of drug distributor license. This resolution can be found here: www.pharmacy.ohio.gov/RP.
RP Criminal Records Checks (OAC 4729:6-2-03 [A][1] & OAC 4729:6-2-01 [B])	Ohio BCI and FBI criminal records checks results must be received within twelve months of application/change of RP. Find more information on how to complete the background check requirements here: www.pharmacy.ohio.gov/backgroundDD.
Previous Discipline or Criminal Conviction (OAC 4729:6-2-01[G])	Subject to waiver by the Board (see OAC 4729:6-2-01 (G)). For questions, visit: https://www.pharmacy.ohio.gov/contact.