Delay of Drug Distributor Customer Due Diligence Requirements

Updated 6/8/2020

Delay of Customer Due Diligence Requirements

In order to ensure the continuity of the drug supply chain during the COVID-19 outbreak, the State of Ohio Board of Pharmacy issued the following guidance on drug distributor due diligence requirements pursuant to paragraph (G) of rule 4729:6-3-05 of the Administrative Code.

This guidance is being issued in accordance with a Board resolution adopted on May 5, 2020.

So as to not place undue burden on licensees during the COVID-19 outbreak, the annual due diligence requirements are hereby extended until **November 29, 2020** (the date was previously extended to August 31, 2020).

IMPORTANT: This guidance does not exempt or delay drug distributors from submitting suspicious order reports and customer reporting as required by paragraphs (E) and (H) of rule 4729:6-3-05 of the Administrative Code.

Additional Delay of ARCOS Review Requirement for Drug Distributors – Updated 5/26/2020

Additionally, the Board has been made aware of certain data issues associated with the Drug Enforcement Administration's ARCOS drug distributor lookup tool, as required by paragraph (G)(1)(d)(iii) of rule 4729:6-3-05 of the Administrative Code.

Therefore, the requirement to check the ARCOS tool as part of the customer due diligence requirements has been further delayed to **November 29, 2020**. The Board is working closely with DEA and will provide additional updates to licensees when reported data issues have been resolved.

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