



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as a terminal distributor of dangerous drugs with an office-based opioid treatment (OBOT) classification, will be repealed.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. 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.

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.

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. 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

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

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. To ensure prompt review, make sure to include the phrase “OBOT” and your TDDD license number in the subject header of the email.