Controlled Substance Inventory Requirements

Updated 5/21/2025

Rule 4729:5-3-07 of the Ohio Administrative Code requires all category III terminal distributors of dangerous drugs to take inventory of all stocks of controlled substances on hand **every year**. This is different from the DEA requirement that requires a controlled substance inventory every two years. **NOTE:** The inventory may be taken on any date which is within thirteen months of the previous inventory date.

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 terminal distributor of dangerous drugs must make an exact count or measure of the contents.

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- If the substance is listed in Schedule III, IV, or V, the 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.

- If there are no stocks of controlled substances on hand, the category III terminal distributor should make a record showing a zero inventory.

- A separate inventory must be made for each place or establishment where controlled substances are in the possession or under the control of the terminal distributor.

- All inventory records must be kept for a period of three years at the place where the controlled substances are located.

The annual inventory must comply with the same requirements as a DEA inventory. For more information on DEA inventory requirements visit: https://www.deadiversion.usdoj.gov/pubs/manuals/

To assist licensees in complying with these record keeping requirements, the Ohio Board of Pharmacy developed a ***sample*** DEA Controlled Substance Inventory Form that can be accessed here: www.pharmacy.ohio.gov/DEAinventoryform.