



Responsible Person Requirements for Licensure

Updated 11/17/2025

Pursuant to rules [4729:5-2-01](#) and [4729:6-2-01](#) of the Ohio Administrative Code, the Ohio Board of Pharmacy is required to adopt a resolution providing the credential types or qualifications required for the responsible person 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 responsible person for that classification type.

Additionally, the resolution also provides additional guidance to licensees regarding compliance with the Board’s rule chapters. For each licensee, there is a link (if applicable) to an inspection guide that applies to the specific license type.

The requirements for terminal distributors of dangerous drugs begin on [page 3](#) of this document.

The requirements for distributors of dangerous drugs* begin on [page 19](#) of this document.

***NOTES:**

- 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).
- “APRN” refers to the following license types: Certified Registered Nurse Anesthetist, Certified Nurse Practitioner, Certified Nurse-Midwife, and Clinical Nurse Specialist who have prescriptive authority via chapter 4729. of the Revised Code.

- “PA” refers to a physician assistant subject to authorization of physician-delegated prescriptive authority. For category III license, must demonstrate proof of mid-level DEA registration.
- An executive director for the purposes of a limited terminal distributor of dangerous drugs license for animal shelter, humane society, or dog pound means any person that meets both of the following requirements:
 1. Maintains control over day-to-day operations of a location; and
 2. Is responsible for staffing decisions (including volunteers) such as hiring, termination, promotion, or allocation of staff resources or structure.

Effective October 6, 2025, the Board hereby adopts the following responsible person requirements:

TERMINAL - CLINIC				
Subcategory	Subcategory Definition	Approved Credentials for Responsible Person	Special Requirements	Applicable Inspection Guide / OAC Code Section
AS	Ambulatory Surgery	DO, MD, RPH, DDS/DMD		Institutional (OAC 4729:5-9)
CI	Correctional Institution - Clinic or med room that is located within a correctional facility or jail.	DO, MD, RPH, APRN, PA		Institutional (OAC 4729:5-9)
CL	Clinic - Health Dept., Free Clinic, Specialty Clinic	DO, MD, RPH, APRN, PA, DDS/DMD, DPM	*If possessing RU-486 (mifepristone) must be MD or DO	Clinic and Prescriber Office (OAC 4729:5-19)
CT	Chemical Treatment	DO, MD, RPH, APRN, PA		Clinic and Prescriber Office (OAC 4729:5-19) or Institutional (OAC 4729:5-9)
ED	Free Standing Emergency Department	DO, MD, RPH		Institutional (OAC 4729:5-9)
MS/IV	Med Spa/IV Therapy	DO, MD, APRN, PA, RPH		Clinic and Prescriber Office (OAC 4729:5-19)

MC	Mobile Clinic - Drugs stored on a truck, aircraft, bus, etc.; includes non-emergent helicopters and aircraft.	DO, MD, RPH, DVM, APRN, PA, DDS/DMD		Limited Facility (OAC 4729:5-23) or Non-Limited Facility (OAC 4729:5-22)
MH	Mental Health	DO, MD, RPH, APRN, PA		Clinic and Prescriber Office (OAC 4729:5-19) or Institutional (OAC 4729:5-9)
ONC	Oncology Clinic	DO, MD, RPH		Clinic and Prescriber Office (OAC 4729:5-19)
PC	Prescriber Practice	DO, MD, APRN, PA, DDS/DMD, OD, RPH, DPM	OD must provide therapeutic number *If possessing RU-486 (mifepristone) must be MD or DO	Clinic and Prescriber Office (OAC 4729:5-19)
POC	Point of Care - Pyxis located in another Hospital	RPH		Institutional (OAC 4729:5-9)
RT	Clinical Trials	DO, MD, RPH, DVM, OD, DDS/DMD, DPM	OD must provide therapeutic number	Clinic and Prescriber Office (OAC 4729:5-19)
SC	Sports Training Facility	DO, MD, RPH, APRN, PA		Clinic and Prescriber Office

				(OAC 4729:5-19)
UR	Urgent Care + Convenience Care Clinic	DO, MD, APRN, PA, RPH		Clinic and Prescriber Office (OAC 4729:5-19)

TERMINAL - CLINIC - SOLE PRACTITIONER/DENTIST

Subcategory	Subcategory Definition	Approved Credentials for Responsible Person	Special Requirements	Applicable Inspection Guide / OAC Code Section
MS/IV	Med Spa/IV Therapy	DO, MD, APRN, PA, RPH		Clinic and Prescriber Office (OAC 4729:5-19)
PC	Prescriber Practice	DO, MD, APRN, PA, DDS/DMD, OD, RPH, DPM	OD must provide therapeutic number *If possessing RU-486 (mifepristone) must be MD or DO	Clinic and Prescriber Office (OAC 4729:5-19)

TERMINAL - OPIOID TREATMENT PROGRAM

Subcategory	Subcategory Definition	Approved Credentials for Responsible Person	Special Requirements	Applicable Inspection Guide / OAC Code Section
OTP	Opioid Treatment Program - Personally furnish buprenorphine and/or administer methadone.	DO, MD	*Category III only. Obtain SAMHSA or CARF accreditation after licensure.	Opioid Treatment Program (OAC 4729:5-21)

TERMINAL - PAIN MANAGEMENT CLINIC

Subcategory	Subcategory Definition	Approved Credentials for Responsible Person	Special Requirements	Applicable Inspection Guide / OAC Code Section
GPMC	Grandfathered Pain Management Clinic **Approved by the Medical and Pharmacy Boards in 2011	DO, MD	*Category III only. Required background check on Owners, RP, and employees.	Pain Management Clinic (OAC 4729:5-11)
PMC	Pain Management Clinic	DO, MD	*Category III only. Required background check on Owners, RP, and employees. **RP must meet requirements in OAC 4729:5-2-01(C)(3)	Pain Management Clinic (OAC 4729:5-11)

TERMINAL - EMS - LIMITED

Subcategory	Subcategory Definition	Approved Credentials for Responsible Person	Special Requirements	Applicable Inspection Guide / OAC Code Section
EM	EMS Headquarters	DO, MD, RPH		EMS (OAC 4729:5-14)
EMSS	EMS Satellite	DO, MD, RPH		EMS (OAC 4729:5-14)

TERMINAL - FACILITY - VETERINARY MEDICINE

Subcategory	Subcategory Definition	Approved Credentials for Responsible Person	Special Requirements	Applicable Inspection Guide / OAC Code Section
VT	Veterinary Practice, Zoo, Veterinary Hospital	DVM		Veterinary Clinic (OAC 4729:5-20)

TERMINAL - FACILITY - NON-LIMITED

Subcategory	Subcategory Definition	Approved Credentials for Responsible Person	Special Requirements	Applicable Inspection Guide / OAC Code Section
AS	Animal Shelter - Humane Society or Dog Pound	DVM	* Drug List Required	Animal Shelter (OAC 4729:5-15)
ASCC	Animal Shelter with Chemical Capture	DVM	Complies with ORC 4729.534	Animal Shelter (OAC 4729:5-15)

			* Drug List Required	
BB	Blood Bank	DO, MD		Non-Limited Facility (OAC 4729:5-22)
CC	Custodial Care, Pediatric Respite, Group Home	DO, MD, APRN, PA, RN	RN - Only if medication is delivered patient specific	Non-Limited Facility (OAC 4729:5-22)
DU	Dialysis Unit	DO, MD, APRN, PA, RPH		Non-Limited Facility (OAC 4729:5-22)
HC	Hospice	DO, MD, RPH		Institutional (OAC 4729:5-9)
IC	Infusion Center	DO, MD, RPH, APRN, PA		Non-Limited Facility (OAC 4729:5-22)
IM	Imaging	DO, MD, RPH		Non-Limited Facility (OAC 4729:5-22)
LA	Laboratory/Research	DO, MD, PHD, Chemist*, Management*, RPH, DVM, DDS/DMD	* Chemist or Management must provide a proof of a degree in one of the following: chemistry, biochemistry, forensic science, biology, microbiology, or related pure applied science or proof of certified training in the field of expertise.	Laboratory (OAC 4729:5-16)

TERMINAL - FACILITY - LIMITED

Subcategory	Subcategory Definition	Approved Credentials for Responsible Person	Special Requirements	Applicable Inspection Guide / OAC Code Section
AS	Animal Shelter – Humane Society or Dog Pound	CET, DVM, DOG WARDEN, Executive Director	* Drug List Required	Animal Shelter (OAC 4729:5-15)
ASCC	Animal Shelter with Chemical Capture	CET, DVM, DOG WARDEN, Executive Director	Comply with ORC 4729.534 * Drug List Required	Animal Shelter (OAC 4729:5-15)
DG	Dog Trainer	Management + LENA	Law Enforcement Affiliation or contract required. * Drug List Required	Limited Facility (OAC 4729:5-23)
FA	First Aid Room/Department	DO, MD, APRN, PA, RN	RN - Only if medication is delivered patient specific or for the purposes of personal furnishing naloxone.	First Aid Department (OAC 4729:5-13)
HH	Home Health Care - Providing services to the patient's homes or vaccinations off-site	DO, MD, RPH		Limited Facility (OAC 4729:5-23)
ND	Nursing Home Drug Stock	DO, MD, APRN, PA		Limited Facility (OAC 4729:5-23)

PD	Peritoneal Dialysis Center - Ships directly to the patient's home, RPh does not perform final verification	Management		Limited Facility (OAC 4729:5-23)
PT	Physical Therapy	DO, MD, RPH		Limited Facility (OAC 4729:5-23)
TE	Teaching Institution	DDS/DMD, DO, MD, HEAD OF PROGRAM (RN), RPH, APRN, PA, OD, DVM	If injecting into humans, must be – DDS/DMD, DO, MD, DDS/DMD, OD, RPH, PA or APRN.	Limited Facility (OAC 4729:5-23)

TERMINAL - MEDICAL GAS - LIMITED

Subcategory	Subcategory Definition	Approved Credentials for Responsible Person	Special Requirements	Applicable Inspection Guide / OAC Code Section
CX	Contingency Stock	RN, LNHA, Management, RRT		Medical Gases (OAC 4729:5-17)
GM	Manufacturer Process Use + Food Processor	Management		Medical Gases (OAC 4729:5-17)
OX	Retail Seller or Biller of Oxygen	MD, DO, RN, APRN, PA, LNHA, RRT, OD, DDS/DMD, DVM, RPH, Management	*Saline and Sterile Water can be included on drug list.	Medical Gases (OAC 4729:5-17)

TERMINAL - NON-RESIDENT PHARMACY

Subcategory	Subcategory Definition	Approved Credentials for Responsible Person	Special Requirements	Applicable Inspection Guide / OAC Code Section
CF	Central Fill Pharmacy	RPH	Must hold pharmacist license in state where pharmacy is located and Ohio RPH license if shipping compounded medications.	Non-Resident (OAC 4729:5-8)
IP	Pharmacy Servicing Institutions	RPH	Must hold pharmacist license in state where pharmacy is located and Ohio RPH license if shipping compounded medications. May include Mental Health Pharmacies & Nursing Home Inpatient Pharmacies	Non-Resident (OAC 4729:5-8)
MO	Mail Order Pharmacy	RPH	Must hold pharmacist license in state where pharmacy is located and Ohio RPH license if	Non-Resident (OAC 4729:5-8)

			shipping compounded medications.	
MTM	Medication Therapy Mgmt/Consulting (NO DRUGS ON SITE)	RPH	Must hold pharmacist license in state where pharmacy is located	Non-Resident (OAC 4729:5-8)
NU	Nuclear Pharmacy	RPH	Must hold pharmacist license in state where pharmacy is located and Ohio RPH license if shipping compounded medications.	Non-Resident (OAC 4729:5-8)
PI	Prescription Intermediary (NO DRUGS ON SITE)	RPH	Must hold pharmacist license in state where pharmacy is located and Ohio RPH license if shipping compounded medications.	Non-Resident (OAC 4729:5-8)
REM	Remote Prescription Processing (NO DRUGS ON SITE)	RPH	Must hold pharmacist license in state where pharmacy is located	Non-Resident (OAC 4729:5-8)
SP	Specialty Pharmacy - High \$ Drugs	RPH	Must hold pharmacist license in state where pharmacy is located and Ohio RPH license if	Non-Resident (OAC 4729:5-8)

			shipping compounded medications. May include compounding	
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TERMINAL - PHARMACY - NON-LIMITED				
Subcategory	Subcategory Definition	Approved Credentials for Responsible Person	Special Requirements	Applicable Inspection Guide / OAC Code Section
CF	Central Fill Pharmacy	RPH		Outpatient Pharmacy (OAC 4729:5-5)
CH	Charitable Pharmacy	RPH	Must provide tax exempt paperwork.	Outpatient Pharmacy (OAC 4729:5-5)
CP	Clinic Pharmacy	RPH		Outpatient Pharmacy (OAC 4729:5-5)
DM	Durable Medical Equipment	RPH		Outpatient Pharmacy (OAC 4729:5-5)
DR	Drug Repository	RPH		Outpatient Pharmacy (OAC 4729:5-5)
FL	Fluid Therapy	RPH		Outpatient Pharmacy (OAC 4729:5-5)
HOC	Hospital Outpatient Community Access	RPH		Outpatient Pharmacy (OAC 4729:5-5)

HOL	Hospital Outpatient Limited Access	RPH		Outpatient Pharmacy (OAC 4729:5-5)
HS	Hospital	RPH		Institutional (OAC 4729:5-9)
II	Independent Community Retail (1 Outlet)	RPH		Outpatient Pharmacy (OAC 4729:5-5)
IL	Large Chain Retail (12+ Outlets)	RPH		Outpatient Pharmacy (OAC 4729:5-5)
IP	Pharmacy Servicing Institutions	RPH	May include mental health pharmacies & nursing home inpatient pharmacies.	Institutional (OAC 4729:5-9)
IS	Small Chain Retail (2-11 Outlets)	RPH		Outpatient Pharmacy (OAC 4729:5-5)
KI	Kiosk	RPH		Institutional (OAC 4729:5-9)
MD	Multi-Disciplinary	RPH	May include compounding	Outpatient Pharmacy (OAC 4729:5-5)
MO	Mail Order Pharmacy	RPH		Outpatient Pharmacy (OAC 4729:5-5)
NU	Nuclear Pharmacy	RPH		Nuclear (OAC 4729:5-6)
ONC	Oncology Pharmacy	RPH		Outpatient Pharmacy

				(OAC 4729:5-5)
PI	Prescription Intermediary (NO DRUGS ON SITE)	RPH		Outpatient Pharmacy (OAC 4729:5-5)
SP	Specialty Pharmacy - High \$ Drugs	RPH	May include compounding	Outpatient Pharmacy (OAC 4729:5-5)

TERMINAL - PHARMACY - LIMITED*

**Category 2 only*

Subcategory	Subcategory Definition	Approved Credentials for Responsible Person	Special Requirements	Applicable Inspection Guide / OAC Code Section
CR	Consulting Pharmacy	RPH		Outpatient Pharmacy (OAC 4729:5-5) or Institutional (OAC 4729:5-9)
CRP	Contract Remote Order Entry	RPH		Outpatient Pharmacy or Institutional - Specifically Remote Order Entry Requirements
MTM	Medication Therapy Management	RPH		Medication Therapy Management (OAC 4729:5-12)

PI	Prescription Intermediary	RPH		Outpatient Pharmacy (OAC 4729:5-5)
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TERMINAL - PHARMACY SUPPLIED CONTINGENCY STOCK

Subcategory	Subcategory Definition	Approved Credentials for Responsible Person	Special Requirements	Applicable Inspection Guide / OAC Code Section
CI	Correctional Institution	Ohio RPH		Institutional (OAC 4729:5-9)
CS	Community Pharmacy	Ohio RPH		Outpatient Pharmacy (OAC 4729:5-5)
HC	Hospice Facility	Ohio RPH		Institutional (OAC 4729:5-9)
HS	Hospital	Ohio RPH		Institutional (OAC 4729:5-9)
MH	Mental Health Institution	Ohio RPH		Institutional (OAC 4729:5-9)
NH	Nursing Home	Ohio RPH		Institutional (OAC 4729:5-9)

DISTRIBUTOR OF DANGEROUS DRUGS – MANUFACTURER, OUTSOURCING FACILITY, REPACKAGER, AND THIRD-PARTY LOGISTICS PROVIDER				
Subcategory	Subcategory Definition	Approved Credentials for Responsible Person	Special Requirements	Applicable Inspection Guide / OAC Code Section
MF	Manufacturer	Management		Manufacturer (OAC 4729:6-8)
MF	Manufacturer (Nonresident)	Management	Located outside of Ohio	Manufacturer (OAC 4729:6-8)
OSC	Outsourcing Facility – 503B sterile and/or non-sterile compounding at wholesale, not patient specific	Ohio Licensed RPH	Must provide FDA registration and inspection report	Outsourcing Facility (OAC 4729:6-10)
OSC	Outsourcing Facility (Nonresident) – 503B sterile and/or non-sterile compounding at wholesale, not patient specific	Ohio Licensed RPH	Located outside of Ohio Must provide FDA registration and inspection report	Outsourcing Facility (OAC 4729:6-10)
RE	Repackager	Management	Must provide FDA registration	Repackager (OAC 4729:6-9)
RE	Repackager (Nonresident)	Management	Located outside of Ohio Must provide FDA registration	Repackager (OAC 4729:6-9)

3PL	Third-Party Logistics - Stores and distributes drug but does not have ownership	Management		Third-Party Logistics Providers (OAC 4729:6-11)
3PL	Third-Party Logistics (Nonresident) - Stores and distributes drug but does not have ownership	Management	Located outside of Ohio Must have licensure from home state or VAWD Accreditation.	Third-Party Logistics Providers (OAC 4729:6-11)

WHOLESALE

Subcategory	Subcategory Definition	Approved Credentials for Responsible Person	Special Requirements	Applicable Inspection Guide / OAC Code Section
BC	Bulk Pharmaceutical Chemicals	Management		Wholesale Distributor (OAC 4729:6-5)
BC	Bulk Pharmaceutical Chemicals (Nonresident)	Management	Located outside of Ohio	Wholesale Distributor (OAC 4729:6-5)
BG	Buying Group - A group of wholesalers/stores that leverage for better pricing	Management		Wholesale Distributor (OAC 4729:6-5)
BR	Broker	Management		Wholesale Distributor (OAC 4729:6-7)
BR	Broker (Nonresident)	Management	Located outside of Ohio Must have licensure from home state.	Wholesale Distributor (OAC 4729:6-7)
CM	Compressed Medical Gases	Management		Wholesale Distributor (OAC 4729:6-5)
CM	Compressed Medical Gases (Nonresident)	Management	Located outside of Ohio	Wholesale Distributor (OAC 4729:6-5)

CN	Clinic Wholesaler: Blood Banks, Health Departments	Management		Wholesale Distributor (OAC 4729:6-5)
CN	Clinic Wholesaler (Nonresident): Blood Banks, Health Departments	Management	Located outside of Ohio	Wholesale Distributor (OAC 4729:6-5)
FS	Full Service	Management		Wholesale Distributor (OAC 4729:6-5)
FS	Full Service (Nonresident)	Management	Located outside of Ohio	Wholesale Distributor (OAC 4729:6-5)
IE	Import/Export - Importing drugs from in/out of the country	Management		Wholesale Distributor (OAC 4729:6-5)
IE	Import/Export (Nonresident) - Importing drugs from in/out of the country	Management	Located outside of Ohio	Wholesale Distributor (OAC 4729:6-5)
LA	Laboratory	Management		Wholesale Distributor (OAC 4729:6-5)
LA	Laboratory (Nonresident)	Management	Located outside of Ohio	Wholesale Distributor (OAC 4729:6-5)
PU	Public Health Preparedness*	Management		Wholesale Distributor (OAC 4729:6-5)

	NOTE: A board of health, as defined in section 3701.048 of the Revised Code, that is licensed as a terminal distributor of dangerous drugs (TDDD) for the purpose of distributing dangerous drugs to another TDDD during a declared public health emergency or emergency preparedness incident is not required to obtain licensure as a wholesale distributor.			
PU	Public Health Preparedness (Nonresident) NOTE: A board of health, as defined in section 3701.048 of the Revised Code, that is licensed as a terminal distributor of dangerous drugs (TDDD) for the purpose of distributing dangerous drugs to another TDDD during a declared public health emergency or emergency preparedness incident is not required to obtain licensure as a wholesale distributor.	Management	Located outside of Ohio	Wholesale Distributor (OAC 4729:6-5)
SD	Samples Distributor	Management		Wholesale Distributor (OAC 4729:6-5)

VW	Virtual Wholesaler - NO DRUGS ON SITE	Management		Virtual Wholesalers (OAC 4729:6-6)
VW	Virtual Wholesaler (Nonresident) - NO DRUGS ON SITE	Management	Located outside of Ohio Must have licensure from home state or VAWD Accreditation.	Virtual Wholesalers (OAC 4729:6-6)
WD	Waste Disposal/Reverse Distributor	Management	Must provide DEA & EPA registration	Wholesale Distributor (OAC 4729:6-5)