



practices, who are on or near state borders and hold veterinary licenses in more than one state; practitioners acting as part of emergency service teams; practitioners participating in programs that provide services to underserved populations). That resolution asked the Attorney General to exercise authority granted by the Controlled Substances Act of 1970, 21 U.S.C. § 822 (d), to promulgate regulations that would waive the requirement for veterinarians in ambulatory practices to have a separate United States Department of Justice Drug Enforcement Administration registration in each state in which they are licensed or authorized to practice.

Two important points have been made clear from the DEA's response to the 2010 USAHA resolution, as well as its response to requests from stakeholders to modify regulatory requirements and allow registrants to transport controlled substances to locations remote from registrants' principal place of business (which may be necessary either within a given state or across state lines). The first is that this is a complex issue affecting many dispensers including, but not limited to, veterinarians. The second is that the authority accorded by 21 U.S.C. § 822 to the Department of Justice is insufficient to allow concerns to be resolved through a regulatory process—statutory change is required.

**RESOLUTION:**

The United States Animal Health Association urges Congress to amend the Controlled Substances Act to provide a legal means by which the United States Department of Justice, Drug Enforcement Administration registrants or authorized agents may appropriately transport and utilize controlled substances when acting in the normal course of business or employment pertaining to the treatment of animals (domestic and wildlife) in locations outside of the principal place of business listed on their registration.