



STATE OF MARYLAND

**DHMH**

**Maryland Department of Health and Mental Hygiene**

*Larry Hogan, Governor - Boyd Rutherford, Lt. Governor - Van Mitchell, Secretary*

*Audrey Clark, MPA, Director, Office of Controlled Substances Administration*

**MEMORANDUM**

To: Distributors and Third Party Logistic Providers  
From: Office of Controlled Substances Administration *J*  
Subject: Controlled Dangerous Substances Registrations  
Date: October 28, 2016

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Retroactive to October 1, 2016, the Office of Controlled Substances Administration (“OCSA”), formerly the Division of Drug Control (“DDC”), will no longer have a separate Controlled Dangerous Substances (“CDS”) registration classification for Third Party Logistics Providers (“3PL”).

Pursuant to § 5-301 of the Criminal Law Article, OCSA registers persons that manufacture, distribute, and/or dispense CDS in Maryland. Distribute, with respect to CDS, means to deliver other than by dispensing. CDS means (1) drugs or substances listed in Schedules I through V or (2) immediate precursors to drugs or substances listed in Schedules I through V. The Criminal Law Article does not define or separately regulate 3PLs. Rather, § 12-6C-01 of the Maryland Health Occupations Article defines third party logistics provider as a person who contracts with a manufacturer to provide or coordinate warehousing, distribution, or other services on behalf of the manufacturer.

Therefore, OCSA will no longer have a separate CDS registration classification for 3PLs. OCSA will register 3PLs that distribute CDS as Distributors.