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CIRCULAR LETTER: DCP 23-04-116

Tel: 617-624-6000 www.mass.gov/dph

To: Individual Practitioners

From: James Lavery, Director, Bureau of Health Professions Licensure

David Johnson, Director, Drug Control Program

Date: April 21, 2023

Subject: Address for Individual Practitioner Massachusetts Controlled Substance Registration

(MCSR) Applications and Renewals

This Circular Letter is issued by the Drug Control Program (DCP), which is part of the Bureau of Health Professions Licensure (BHPL), regarding the address to be provided in Massachusetts Controlled Substance Registration (MCSR) applications and renewals for practitioners listed in 105 CMR 700.004(A)(2).

A practitioner must have an MCSR for each location where they are responsible for the purchase and/or storage of controlled substances. The address provided for the application must be that of the location. For example, if a practitioner MCSR is used to purchase controlled substances and authorize storage at two separate practice offices, that practitioner must have two separate MCSRs, one for each such practice office. Each of the MCSR applications must list the physical address of the practice office to be covered by the MCSR.

If a practitioner is not responsible for the purchase and/or storage of controlled substances, they may use any address where DCP can direct program communications for the practitioner. For example, if a Practitioner only prescribes and administers controlled substances, they may use any address where the practitioner can be regularly reached, including the following:

- A post office box or other mail collection type location is permissible for this category of MCSR. The practitioner will be responsible for the prompt receipt and response to communications sent to such an address.
- A practitioner may also elect to use a home address, noting that all MCSR related addresses are considered public information, and will be provided in response to public records requests, unless the practitioner qualifies for a Public Records Law exemption and requests suppression of this personal information.

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Please direct any questions or concerns to The Drug Control Program at dcp.dph@mass.gov.