

**HEALTH REGULATION AND LICENSING ADMINISTRATION
&
HEALTH OCCUPATIONS BOARDS**

BOARD OF PHARMACY
AUTHORITY FOR GUIDANCE

FEBRUARY 2011
DATE OF POLICY

11-001
POLICY NO.

POLICY STATEMENT

**GUIDANCE ON CHANGES A PHARMACIST MAY MAKE TO A PRESCRIPTION
WRITTEN FOR A SCHEDULE II CONTROLLED SUBSTANCE**

This policy statement is issued to clarify that a prescription written for a Schedule II controlled substance, as defined below, may be changed by a pharmacist as long as it is under the conditions set forth in this guidance document.

On November 19, 2007, the Drug Enforcement Administration (DEA) published in the Federal Register the Final Rule entitled *Issuance of Multiple Prescriptions for Schedule II Controlled Substances* (72 FR 64921). In the preamble to that Rule, DEA stated that “the essential elements of the [schedule II] prescription written by the practitioner (such as the name of the controlled substance, strength, dosage form, and quantity prescribed) . . . may not be modified orally.” This, however, is in opposition to DEA’s previous policy which permitted the pharmacist to make limited changes to a prescription written for a Schedule II controlled substance after oral consultation with the prescriber. DEA plans to resolve this confusion through future rulemaking and instructs pharmacists to adhere to state regulations or policy regarding changes that a pharmacist may make to a schedule II prescription. Therefore, through policy, the Board will allow a pharmacist to make limited changes to a schedule II prescription as stated below:

- When presented with a prescription written for a Schedule II controlled substance, a pharmacist may add or change the patient’s address upon verification.
- The pharmacist may add or change the dosage form, drug strength, directions for use, drug quantity, or issue date only after oral consultation directly with and agreement of the prescriber. Such consultations and corresponding changes shall be noted by the pharmacist on the prescription.
- The pharmacist is never permitted to make changes to the patient’s name, controlled substance prescribed (except for generic substitution permitted by law) or the prescriber’s signature.