



# Oregon

John A. Kitzhaber, MD, Governor

**Oregon Board of Pharmacy**  
800 NE Oregon Street, Suite 150  
Portland, OR 97232  
Phone: 971 / 673-0001  
Fax: 971 / 673-0002

E-mail: [pharmacy.board@state.or.us](mailto:pharmacy.board@state.or.us)  
Web: [www.pharmacy.state.or.us](http://www.pharmacy.state.or.us)

Posted May 9, 2011

Memo to Oregon Pharmacists:

Both the Drug Enforcement Administration and the State of Oregon expect and encourage prescribers to include all required information when issuing a controlled substance prescription. This memo is written to clarify for Oregon pharmacists the very recent and wide spread confusion around prescriptions for C-II Controlled Substances and prescribers' DEA Registration Numbers. Please carefully review the following excerpts.

"On November 19, 2007, the DEA published in the Federal Register (FR) 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."

"The instructions contained in the Rule's preamble are in opposition to DEA's previous policy which permitted the same changes a pharmacist may make to schedules III-V controlled substance prescriptions after oral consultation with the prescriber."

"DEA recognizes the resultant confusion regarding this conflict and plans to resolve this matter through a future rulemaking. Until that time, pharmacists are instructed to adhere to state regulations or policy regarding those changes that a pharmacist may make to a schedule II prescription after oral consultation with the prescriber." *Emphasis Added*  
([Policy Letter](#))

The "[Policy Letter](#)" is an October 2008 "Dear Colleague" letter from Joe Rannazzisi, DEA Deputy Chief of Operations, Office of Diversion Control, from which these excerpts were taken. Nothing has changed regarding the DEA numbers and other required information on CS prescriptions since the issuance of that letter. As stated by Rannazzisi, pharmacists are to adhere to state regulations or policy. This instruction applies until the rule is updated and notice issued by the DEA.

See OBOP's policy under FAQ's below or at:

<http://www.pharmacy.state.or.us/Pharmacy/FrequentlyAskedQuestions.shtml>

**Q:** What changes can a pharmacist make to a CII prescription?

**A:** If allowed by pharmacy policy a pharmacist MAY change the drug strength, dosage form, drug quantity, or the directions after oral consultation with the prescriber and until further notice may add, if kept on file, the patient's address or prescriber's registration number to the prescription without consulting the prescriber. Changes that **cannot** be made are the patient's name, controlled substance prescribed, and the addition of a prescriber's signature (the prescription must be hand signed).