



# Oregon

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Oregon Board of Pharmacy Policy  
C-II PRESCRIPTIONS: REQUIRED INFORMATION  
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**Background:** Both the Drug Enforcement Administration (DEA) and the State of Oregon encourage and expect practitioners to provide all required information when issuing a controlled substance prescription including the prescriber's registration number and the patient's address. This policy is written to update the Board of Pharmacy's Memo to Oregon Pharmacists which was posted on the web May 9, 2011 to clarify existing confusion around required information and changes a pharmacist is allowed to make on C-II Controlled Substance prescriptions. In October of 2008 a "Dear Colleague" letter written by Joe Rannazzisi, DEA Deputy Chief of Operations, Office of Diversion Control, had been posted on the DEA's website. Excerpts from that letter were quoted in the Board's May 9 memo. As stated by Rannazzisi, pharmacists are to adhere to state regulations or policy until the rule is updated and notice issued by the DEA.

In August of 2011 Mr. Rannazzisi responded to a July 26, 2011 letter from NABP seeking further clarification. According to Mr. Rannazzisi's 2011 letter, the DEA expects that when a practitioner fails to provide all required information on a C-II prescription or the information needs to be changed, pharmacists should use their professional judgment and knowledge of state and federal laws and policies in deciding whether to make changes. *"Whether it is appropriate for a pharmacist to make changes to the prescription, such as adding the practitioner's DEA number to the prescription or correcting the patient's name or address varies case by case based on the facts present."*

Pharmacists and prescribing practitioners must be mindful of which dispensing-related activities violate the Controlled Substances Act, such as:

- knowingly or intentionally furnishing false or fraudulent material information;
- dispensing a controlled substances in violation of 21 U.S.C. 829 (which includes requirements for C-II prescriptions);
- knowingly or intentionally using a registration number that is fictitious, revoked, suspended, expired or issued to another person in the course of dispensing of a controlled substance.

**Policy:** Until further notice, it is the current Oregon Board of Pharmacy's position that a pharmacist may, if accurate information is available by other means, add or change the patient's address or the prescriber's registration number without consulting the prescriber if allowed by pharmacy policy and if deemed appropriate in the pharmacist's judgment. A pharmacist may change the drug strength, dosage form, drug quantity, or the directions after oral consultation with the prescriber under DEA and board of Pharmacy rules.

Changes that **cannot** be made include adding or changing the patient's name, the controlled substance prescribed and the prescriber's signature. The prescriber's hand written signature must be present on the written controlled substance prescription when it is presented to the pharmacist.