



State of Utah

Department of Commerce

Division of Professional Licensing

SPENCER COX
Governor

MARGARET BUSSE
Executive Director

MARK B. STEINAGEL
Division Director

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On October 18, 2022, the Drug Enforcement Administration (DEA) Diversion Control Division issued Guidance Document DEA-DC-063. This guidance document was intended to provide clarity to the public regarding Department of Justice policies relating to changes pharmacists may make to schedule II prescriptions. The guidance document states that while the DEA works on additional regulations pharmacists should “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.”

Pending the promulgation of the new rules by the DEA (as alluded to in the guidance document) the Division of Professional Licensing (DOPL), in collaboration with the Utah State Board of Pharmacy, has been asked to clarify DOPL’s current policies regarding a pharmacist’s ability to make changes to schedule II prescriptions.

After consulting with the prescribing practitioner, a pharmacist may add to or change the following elements of a schedule II controlled substance prescription:

1. patient’s name;
2. name of the controlled substance being prescribed, except for a generic substitution as noted on the prescription;
3. dosage form;
4. drug strength;
5. drug quantity; and
6. directions for use.

Any schedule II controlled substance prescription missing any of the above elements is invalid and must be re-issued by the prescribing practitioner.

Any change or addition must be noted on the prescription or documented in the pharmacy software system if the prescription was electronically prescribed and indicated the change/addition was verified by the prescribing practitioner.

A pharmacist is permitted to make patient information changes/additions such as the patient’s address and date of birth. This information should be verified by the pharmacist.

A scheduled II controlled substance prescription is not required to include the prescribing practitioner's DEA number. However, the dispensing pharmacist is ultimately responsible to ensure the prescribing practitioner has a valid DEA number prior to dispensing the medication. If the pharmacy has the prescribing practitioner's DEA number on file, the pharmacist is permitted to annotate the DEA number on the prescription. If the prescribing practitioner's DEA number is not on file with the pharmacy, the pharmacist must obtain that information from the prescribing practitioner and record it on the prescription. If the prescribing practitioner's number cannot be identified, the prescription cannot be filled.

www.dopl.utah.gov • Heber M. Wells Building • 160 East 300 South • P.O. Box 146741, Salt Lake City, UT 84114-6741
telephone (801) 530-6628 • toll-free in Utah (866) 275-3675 • fax (801) 530-6511 • investigations fax (801) 530-6301

