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Policy and Clarification:
Changes to a Prescription Written for a Schedule II Controlled Substance

On November 19, 2007, the 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.”

The preamble text is inconsistent with 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 ambiguity 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. Pending further clarification from Federal regulators, the Vermont Board of Pharmacy finds that it is appropriate for a pharmacist to make limited changes to a schedule II prescription as follows.

When presented with a prescription written for a Schedule II controlled substance, *only after oral consultation with, and agreement of, the prescribing practitioner*, a pharmacist may:

- Add or Change:
 - Patient address
 - Dosage form, drug strength
 - Drug quantity
 - Directions for use
- Change an errantly-recorded¹
 - Issue date
 - “Do Not Fill Until” Date

Such consultation and corresponding changes shall be noted by the pharmacist on the prescription.

The pharmacist is never permitted to make changes to the controlled substance prescribed (except for generic substitution permitted by law) or the prescriber’s name, signature or DEA number.

First approved by the Vermont Board of Pharmacy (VT BOP) on 3-27-19; Amended on 1-22-20.

¹ Authority to change an issue or “Do Not Fill Until” date shall only be used to render the date accurate—relative to the true and correct issue or “Do Not Fill Until” date —and not to circumvent the 30-day and 90-day limitations for filling multiply-issued CII prescriptions described in [VT BOP Administrative Rule 10.16](#)