

New Hampshire Board of Pharmacy Policy Statement on Schedule II Prescription Orders

*Written by Brian Bourque, Doctor of Pharmacy Candidate 2012,
Massachusetts College of Pharmacy and Health Sciences*

Currently, federal law prohibits changes to a schedule II prescription order. However, in August of 2011, the DEA issued a guidance letter to NABP acknowledging that certain situations require the pharmacist to use their professional judgment in making changes to a schedule II prescription after contacting the prescriber. In support of the August letter, the DEA defers changes to a schedule II prescription order to the State. The Board of Pharmacy feels that hardship trickles down to the patient when a schedule II prescription order needs to be adjusted. At the January 2012 Board of Pharmacy meeting, a consensus was reached to develop a policy statement clarifying this issue for pharmacists.

In order to facilitate patient care, the pharmacist can make certain changes to a valid schedule II prescription, only after consulting with the prescriber. After contacting the prescriber and documenting the changes, the pharmacist can change the:

1. Patient's address;
2. Drug strength;
3. Drug quantity;
4. Directions for use;
5. Dosage form.

The prescription can then be filled with the documented changes, and the prescribing practitioner does not need to send a new hard copy. The pharmacist and prescriber should document the date of the conversation and the changes to the prescription as a record of the conversation.

In certain cases, the Board ruled that some changes challenge the necessity of the original prescription and would require a new prescription from the prescribing practitioner. Therefore, the pharmacist is never permitted to change the:

1. Patient's name;
2. Controlled substance(s) prescribed;
3. Prescriber's signature;
4. "Do not fill until" date.

In these cases the pharmacist must receive a new hardcopy of the prescription reflecting the changes. This policy statement is set forth to expedite the process of correcting minor changes to a schedule II prescription, and to optimize patient care.

Summary of acceptable and unacceptable changes to a schedule II prescription order

Changes acceptable in New Hampshire to a schedule II prescription order ¹	Changes not acceptable in New Hampshire to a schedule II prescription order ²
Patient's address	Patient's name
Drug strength	Controlled substance(s) prescribed
Drug quantity	Prescribers signature
Directions for use	"Do not fill until" date
Dosage form	

¹The pharmacist must consult with the prescribing practitioner and both the prescribing practitioner and the pharmacist must document the date and nature of the changes.

²These changes challenge the necessity of the original prescription and require a new hard copy to be presented