DEFENSE HEALTH AGENCY
7700 ARLINGTON BOULEVARD, SUITE 5101
FALLS CHURCH, VIRGINIA 22042-5101

DHA-Policy Memorandum 24-016
July 8, 2024

MEMORANDUM FOR SEE DISTRIBUTION LIST

SUBJECT: Allowed Modifications on Paper Prescriptions for Schedule II Controlled Substance Medications for Military Medical Treatment Facility Pharmacies

Reference:
(a) DoD Directives 5136.01, "Assistant Secretary of Defense for Health Affairs (ASD(HA))," September 30, 2013, as amended
(b) DoD Directive 5136.13, "Defense Health Agency," September 30, 2013, as amended
(c) DHA-Procedural Instruction 5025.01, "Publication System," April 1, 2022
(d) Part 1306.05 of Title 21, Code of Federal Regulations (CFR)
(e) EO-DEA257, DEA-DC-063, October 18, 2022
(f) DHA-Procedural Instruction 6025.31, "Military Medical Treatment Facility Pharmacy Operations," December 20, 2019

This policy memorandum, based on the authorities of References (a) and (b), and in accordance with the guidance of Reference (c) through (e), provides guidelines for pharmacists to modify paper prescriptions for schedule II, controlled substance medications in addition to the guidance provided per reference (f).

The Drug Enforcement Agency (DEA) issued guidance in its August 2022 pharmacist manual, which updated its interpretation of the Part 1306.05 of Title 21, Code of Federal Regulations. This change restricted pharmacists to update required elements on schedule II, controlled substance (CII) prescriptions. Prescriptions requiring updates must be returned to the prescriber for changes or reissuance. The DEA paused the August 2022 guidance and issued a new update on October 18, 2022, titled "Changes Pharmacists May Make to Schedule II, Paper Prescriptions," in response to a nationwide opposition due to delays in patient care. The DEA states pharmacists should adhere to either state regulations or policy regarding those changes that a pharmacist may make to a schedule II prescription after oral consultation with the prescriber. This policy applies to all MTF pharmacies under the purview of the DHA.

Paper prescriptions for CII, prescriptions must include the following:

- Date prescription was issued
- Prescriber's name
- Prescriber's signature
- Prescriber's address
- Prescriber's DEA #
- Patient's full name
- Patient's address

- Medication name
- Strength
- Dosage form
- Quantity prescribed
- Directions for use

A pharmacist can add or make changes on the following elements after obtaining oral approval from the prescribing practitioner (must be the prescriber themselves) who wrote the CII prescription:

- Strength
- Dosage form
- Directions for use
- Quantity prescribed
- Prescriber DEA Number
- Prescriber address

A pharmacist may add or correct the following without consultation with the prescriber:

- Patient address

A pharmacist cannot add or change:

- Prescriber's name
- Prescriber's signature
- Patient's full name (e.g., change to a different patient)
    - Exception: May 'correct' misspellings or a change in patient name.
- The name of the controlled substance
    - Exception: Unless prescribed as a dispense as written, a generic may be substituted for the controlled substance prescribed, in which case the name of the controlled substance can change to the generic.
- Date prescription was issued
    - Exception: Following oral consultation with the prescriber, the date of issuance (date written) can be 'corrected', if (1) date was omitted or (2) written in error (e.g., the practitioner inadvertently wrote the prior year on New Year's Day of the current year).

Pharmacists must thoroughly document all modifications made to the paper prescription for CII medications in the patient's medical record and pharmacy records, including the rationale for the modification, any corresponding communication with the prescriber, and compliance with applicable laws as per reference (d).

This memorandum does not preclude the pharmacist from conducting a thorough review for appropriateness of the prescription and using their professional judgment to ensure the prescription is legal, safe, and appropriate. If the pharmacist identifies concerns, the pharmacist

will collaborate with the prescribing provider to ensure the safety and appropriate treatment for the patient.

This DHA-Policy Memorandum is cleared for public release, and available on the internet from the Health.mil site at https://health.mil/Reference-Center/Policies and is also available to authorized users from the DHA SharePoint site at https://info.health.mil/cos/admin/pubs/.

Please address questions regarding this memorandum to the DHA Pharmacy Operations Division at dha.ncr.pharmacy-ops.mbx.chief-pharm-ops-division@health.mil.

CROSLAND.TELITA.1017383040 Digitally signed by CROSLAND.TELITA.1017383040 Date: 2024.07.08 11:18:06 -04'00'

TELITA CROSLAND
LTG, USA
Director

DISTRIBUTION:

Defense Health Agency Assistant Directors, Deputy Assistant Directors, and Special Staff
Director, Defense Health Support Activity
Director, Defense Health Network Indo-Pacific
Director, Defense Health Network Pacific Rim
Director, Defense Health Network West
Director, Defense Health Network Central
Director, Defense Health Network Atlantic
Director, Defense Health Network East
Director, Defense Health Network National Capital Region
Director, Defense Health Network Europe
Director, Defense Health Network Continental
Directors, Defense Health Agency Military Medical Treatment Facilities
Directors, Defense Health Agency Dental Treatment Facilities