

HYDROCODONE RESCHEDULING INFORMATION

(August 28, 2014)

1. **Federal Law has rescheduled all Hydrocodone combination products as a Schedule II effective October 6, 2014.** The Drug Enforcement Administration (DEA) also refers to them as HCPs. This includes Hydrocodone/Acetaminophen combinations as well as cough suppressants such as Tussionex®, Hycodan®, and many generics.
2. All registrants will need to inventory their Hydrocodone products on October 6, 2014. Please keep a copy of this inventory in a readily retrievable file. It does not need to be sent into their licensing agency.
3. Prescriptions for Hydrocodone products **written before October 6th** are:
 - valid for six months--through April 8, 2015.
 - valid if written by APRNs or PAs.
4. Prescriptions for Hydrocodone products **written on or after October 6th** are:
 - valid only for 30 days
 - not valid when written by APRNs or PAs.
5. Hydrocodone must be reported to PMP as a Schedule II beginning October 6th.
6. Hydrocodone invoices and prescriptions must be filed with Schedule II invoices and prescriptions beginning October 6.
7. **Hydrocodone prescriptions may NOT be:**
 - transferred from one pharmacy to another.
 - be refilled.
 - faxed or called in, unless the emergency provisions are appropriate.
8. A practitioner may issue an emergency prescription for a CII verbally. A written prescription must then be delivered or mailed to the pharmacy within 72 hours or the pharmacy is required to notify the OK Bureau of Narcotics. The quantity prescribed is limited to the amount adequate to treat the patient during the emergency period. Any further quantities must be pursuant to a new written prescription signed by the practitioner.
9. A facsimile of a written, signed CII prescriptions may be faxed directly to a pharmacy from a practitioner's office for a long-term care facility (LTCF) patient or a hospice patient and can serve as the original prescription. If it is faxed from the LTCF or hospice, the original must be presented at the time that the medication is dispensed.
10. Electronic prescribing of Schedule II drugs is permitted if the pharmacy and practitioner have software approved by the DEA.
11. Partial fills for Hydrocodone products are treated as a Schedule II. They may only be partially filled for a LTCF or hospice patient for up to 60 days.
12. Although federal rules permit multiple prescriptions up to a 90 day supply, Oklahoma regulations prohibit multiple prescriptions for the same drug as this voids all but one of the prescriptions. A practitioner may prescribe up to a 90 day supply of a Schedule II in one prescription; however, in many cases a 90 day supply would likely be a failure to guard against diversion and would not be a recommended practice. Professional judgment must be used.
13. Pharmacies may dispense from stock that is labeled as CIII even after October 6, 2014 but manufacturers and wholesalers may not distribute any stock after October 6th unless it has been properly labeled as a CII. This could lead to a temporary disruption in the supply.
14. Any practitioners with Hydrocodone samples (including cough syrups) need to take appropriate action to store and keep proper records. APRNs and PAs would not be able to keep CII samples after October 6th.