Anthem Blue Cross and Blue Shield

Hydrocodone Combination Products Moving to Schedule II

The US Drug Enforcement Administration (DEA) issued its final rule on August 22, 2014 moving hydrocodone combination products (HCP) from Schedule III to Schedule II under the federal Controlled Substances Act. This decision followed a decade of debate involving the US Food and Drug Administration (FDA), DEA and other law enforcement agencies, and scores of organizations representing people with pain, people with substance abuse concerns, and the clinicians who care for both groups. This new ruling will become effective October 6, 2014.

HCP schedule III to II impact to prescribing practices:

• No prescriptions for HCPs issued on or after October 6th, 2014 may authorize refills
• HCP prescriptions issued and filled before October 6, 2014 and authorized for refilling will expire on or before April 8, 2015.
• Nurse Practitioners and Physician Assistants are not authorized to prescribe schedule II drugs in most state.

• Emergency Prescriptions:
  o Unlike schedule III, schedule II prescription generally may not be called in to the pharmacy except for the exception described below.
  o “In an emergency, a practitioner may call-in a prescription for a Schedule II controlled substance by telephone to the pharmacy, and the pharmacist may dispense the prescription provided that the quantity prescribed and dispensed is limited to the amount adequate to treat the patient during the emergency period. The prescribing practitioner must provide a written and signed prescription to the pharmacist within seven days. Further, the pharmacist must notify DEA if the prescription is not received.”

Because of the high utilization of HCPs and the prescribing changes noted above, it is recommended to assess the chronic HCP patient’s prescription needs prior to October 6, 2014. Good planning will help prevent patients from running out of medication and the potential for opioid withdrawal symptoms.