

Vermont Board of Pharmacy
Policy on Hydrocodone Combination Products as Schedule II Drugs

As of October 6, 2014 any hydrocodone combination product will be a DEA Schedule II drug.

Rule 10.16 of the Administrative Rules of the Board of Pharmacy provides:

10.16 Filling Time Limits, Future Fill Dates

(a) No prescription for a Schedule II controlled substance written without a future fill date may be filled more than 30 days after the date the prescription was issued.

(b) An individual practitioner may issue multiple prescriptions authorizing the patient to receive a total of up to a 90-day supply of a Schedule II controlled substance. Each prescription must contain both the original date of issue and the future fill date. For guidance, refer to regulations implementing the federal Controlled Substances Act.

(c) No prescription for a Schedule II controlled substance written to be filled at a future date may be filled more than 90 days after the date the prescription was issued.

Under Vermont law Schedule II prescriptions for future use are limited to issuance under this rule. The Board of Pharmacy reads this rule to permit only 2 future fill prescriptions for Schedule II drugs when the prescriber has set the future fill dates for each. The rule, by implication bars refills of Schedule II drugs.

The Board of Pharmacy, therefore, adopts the following policy:

Notwithstanding Drug Enforcement Administration transitional recommendations regarding hydrocodone combination product refills, the Board construes Administrative Rule 10.16 and Vermont law to bar refills of hydrocodone combination products after October 6, 2014.

Vermont Board of Pharmacy:

/s/
Jeffrey P. Firlik, R.Ph., Chair

September 24, 2014