## TRAMADOL IS A SCHEDULE IV CONTROLLED SUBSTANCE EFFECTIVE AUGUST 18, 2014

Effective August 18, 2014, tramadol and products containing tramadol will be classified as Schedule IV controlled substances pursuant to a rule adopted by the United States Drug Enforcement Agency (D.E.A.).

In order to ensure compliance with state and federal controlled substance requirements, the Alabama State Board of Pharmacy advises that all pharmacists and prescribing practitioners adhere to the following requirements:

- All pharmacies, prescribing practitioners and other licensed locations must take an inventory of their current stock of tramadol and other products containing tramadol on or before August 18, 2014. From then on, all tramadol products must be a part of every controlled substance inventory.
- Any location possessing tramadol or products containing tramadol that is not currently registered with the D.E.A. must apply for a D.E.A. registration prior to August 18, 2014. If they do so, they may continue their activities until D.E.A. acts on the application. Alternatively, those locations not wishing to seek D.E.A. registration must remove all tramadol products from their possession prior to August 18, 2014.
- o If a prescription for tramadol product was issued prior to August 18, 2014 and refills were authorized, as of August 18, 2014 those refills must be limited to no more than five refills total-including before and after August 18, 2014, and must be dispensed no later than six months after the date the prescription was initially issued. To ensure compliance with this requirement some possible solutions include:
  - > Changing the prescription number to a "controlled" number format that your pharmacy utilizes. This would mean discontinuing the non-controlled prescription and referencing the discontinued script to the "new" controlled prescription number.
  - > Discontinuing the current prescription and obtaining a new controlled prescription directly from the prescriber.
- No electronic prescriptions for tramadol or products containing tramadol may be sent to a pharmacy using an electronic prescription transmission system unless the prescriber's and the receiving pharmacy's system meets the DEA requirements noted in section 21 C.F.R. 1311.
- All current prescriptions for tramadol and products containing tramadol must be treated as controlled substance prescriptions on and after August 18, 2014.
- Prior to filling/refilling a tramadol prescription on or after August 18, 2014, ensure that the
  prescriber has a valid D.E.A. registration, as required for all controlled substance
  prescriptions. All prescribers who do not have a valid D.E.A. registration will not be able to
  issue prescriptions or personally furnish tramadol or tramadol containing products in the
  state of Alabama.

In order to ensure compliance with state and federal controlled substance requirements, the Alabama State Board of Pharmacy encourages all pharmacists and prescribing practitioners to read and follow the D.E.A. requirements for controlled substances before accepting or prescribing tramadol or any other product containing tramadol.

For more information on the DEA's tramadol rule please visit: <a href="http://www.deadiversion.usdoj.gov/fed\_regs/rules/2014/fr0702.htm">http://www.deadiversion.usdoj.gov/fed\_regs/rules/2014/fr0702.htm</a>