

Pain Management Coding Alert

News Flash: Don't Miss the New Criteria for Prescribing Hydrocodone Combo Meds

DEA cracks down on who can order what.

States have very specific rules regarding prescribing controlled substances, which means you should always make sure your providers are compliant with current regulations.

Keep in mind: Each state decides who has the authority to prescribe controlled substances within that state, provided the state's regulations don't conflict with federal law.

Case in point: The Drug Enforcement Agency (DEA) recently took emergency action to reclassify combination analgesics containing hydrocodone and acetaminophen or aspirin (such as Vicodin, Lortab, or Norco) from Schedule III to Schedule II status. The DEA cited over-prescribing and underestimating of addiction potential as its reason for the shift.

The change □ which was effective Oct. 6, 2014 □ has significant implications for pain management specialists. Three top results of the action include:

- You can no longer call hydrocodone combination drugs in to pharmacies, except under very limited emergency situations.
- Providers must limit written prescriptions for hydrocodone combination drugs to a 30-day supply.
- Providers cannot allow for refills when they write prescriptions for hydrocodone combination drugs.

"Another potential issue with this change affects NPs and PAs that work in states that allow NPPs (non-physician providers) to write prescriptions for Schedule III controlled substances, but not Schedule II," says **Marvel J. Hammer, RN, CPC, CCS-P, PCS, ACS-PM, CHCO**, of MJH Consulting in Denver, Co. "They previously could prescribe these drugs but after Oct. 6 will no longer be able to. Their practices will need to address this change."

Take action: Familiarize yourself with the rules and regulations surrounding this change, including a review of guidelines regarding substantive requirements in the Federal Controlled Substances Act 21 CFR 1306.04. Specifically, the Act sets forth these requirements when prescribing controlled substances:

- A valid physician-patient relationship
- Prescription services must be within the scope of the physician's practice
- Guidelines based on generally accepted medical standards of care
- Supporting documentation for the prescription
- Patient risk assessment.

Many providers interpret these standards to mean that a physician must meet all five requirements as well as other substantive requirements in the Act before prescribing controlled substances for their patients. Because of the reclassification of hydrocodone combination products, patients who need additional medications will need to obtain a new written prescription for each 30-day supply.