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Board of Registration in Pharmacy

Advisory: Controlled Substance Prescriptions

Under Massachusetts law, licensed pharmacists have a corresponding responsibility to evaluate prescriptions for appropriateness and validity. Below is a list of requirements and valuable tools for pharmacists to assist with this task.

- I. In accordance with M.G.L. c. 94C §19(a), prescriptions must be issued pursuant to a valid patient / prescriber relationship and for a legitimate medical reason by a prescriber acting in the usual course of his / her professional practice.
- II. When evaluating a prescription, consider the following points as potential “Red Flags,” indicating the potential for misuse and diversion:
 - a. Prescriber is located at a great geographic distance from the pharmacy.
 - b. Patient lives a great geographic distance from the pharmacy or prescriber.
 - c. Patient frequently requests early refills.
 - d. Patient often runs out of or “loses” their medications.
 - e. Patient requests to bypass insurance and pay with cash.
 - f. Prescriptions written for combinations known as “cocktails” (i.e. containing an opioid, a benzodiazepine, and a muscle relaxant).
 - g. Prescriptions written for unusually large quantities for a single patient.
 - h. Multiple prescribers for a single patient.
 - i. Multiple pharmacies used by a single patient.
 - j. Groups of patients that present at the same time with the same prescriptions.
 - k. Strong analgesic prescriptions written by a prescriber that is not associated with pain management.
 - l. Prescriptions written by prescribers with federal or state regulatory actions against them.
 - m. Prescriptions that appear to be written in multiple colors or printing / writing.
 - n. Patients that use street slang and present with unusual or aggressive behavior.
 - o. Patients that rush or try to distract you while you fill their prescription.

A National Association of Boards of Pharmacy (NABP) video was designed to assist pharmacists with identifying the warning signs of prescription drug misuse and diversion:

<https://www.youtube.com/watch?v=WY9BDgcdxaM&feature=youtu.be>

- III. Utilize the Prescription Monitoring Program (PMP) when evaluating and processing controlled substance prescriptions. The Massachusetts PMP (MassPAT) is a tool that supports safe prescribing and dispensing and assists in identifying prescription drug misuse, abuse, and diversion. As a reminder, all pharmacy data required within 105 CMR 700.012 must be reported to MassPAT on the next business day following the most recent transmission.

For more information, review the following documents:

Best Practice Recommendations for Controlled Substance Inventory Management:

<https://www.mass.gov/lists/pharmacy-practice-resources>

DEA Pharmacist's Manual:

<http://www.deadiversion.usdoj.gov/pubs/manuals/pharm2/>

Please direct any questions to: Pharmacy.Admin@Mass.gov