

*This is a copy of two small segments of the DEA Pharmacist Manual, April 2004.
This material is absent from the DEA Practitioner's Manual.*

Narcotic Treatment Programs

The Narcotic Addict Treatment Act of 1974 is the law that governs the use of narcotics and the treatment of addiction in the United States. In addition, the law designates which government agencies have responsibility for narcotic treatment programs, defines the terms "maintenance" and "detoxification," and explains who has to register to treat patients for drug dependence.

There are separate recordkeeping and security requirements for Narcotic Treatment Programs. The CFR requirements for narcotic treatment programs include:

- *Official Order Forms* (DEA Form-222) are required for all Schedule II narcotic transactions between a narcotic treatment program and any registrant, including a manufacturer, distributor, practitioner or another narcotic treatment program.
- A narcotic treatment program registered with DEA can handle only the narcotic substances applied for on the DEA Form-363 (New Application Registration, see [Appendix K](#)) and that are approved for use in maintenance or detoxification.
- Controlled substances for treatment of conditions other than narcotic addiction cannot be administered, dispensed or stored on the premises of a narcotic treatment program unless a physician has a valid practitioner registration at the program location.

Use of Methadone Outside a Narcotic Treatment Program

1. A practitioner may prescribe methadone or any other narcotic to a narcotic addict for analgesic purposes. However, a practitioner may not prescribe methadone or any other narcotic medication solely for the treatment of a patient's narcotic addiction. The individual must receive the narcotics at a registered narcotic treatment program. In this case, the narcotics can be dispensed or administered but not prescribed. (The regulations do not prohibit the prescribing, administering or dispensing of methadone for analgesic purposes for medical conditions other than addiction.)
2. A practitioner who is not part of a narcotic treatment program may administer narcotic substances to an addicted individual to relieve that individual's acute withdrawal symptoms while the practitioner makes arrangements to refer the individual to a narcotic treatment program. Not

more than one day's medication may be administered at one time. This treatment cannot last more than three days and may not be renewed or extended.

3. A hospital that has no narcotic treatment program on the premises may administer narcotics to a drug dependent individual for either detoxification or maintenance purposes, if the individual is being treated for a medical condition other than narcotic addiction.

If you have questions regarding any part of the Narcotic Addict Treatment Act of 1974 or its regulations, contact the nearest DEA Diversion Field Office (see http://www.deadiversion.usdoj.gov/offices_n_dirs/fielddiv/index.html)

Ordering Controlled Substances

Schedule II Substances

Only Schedule I and II controlled substances are ordered with a DEA Form-222 (Official Order Form, see [Appendix H](#)). An Official Order Form is required for each distribution, purchase or transfer of a Schedule II controlled substance.

When a controlled substance has been transferred by DEA from Schedule II to another Schedule at the federal level, in many states it remains in Schedule II pending any legislative or administrative actions that may result from the federal action. Many states require that transactions involving substances that they classify as Schedule II be made via DEA Form-222 Official Order Forms. Where federal and state laws or regulations conflict, the stricter applies. When the use of DEA Form-222 Official Order Forms for the transfer of a controlled substance is not required under federal law, its use as mandated by these states does not violate federal law and is therefore permitted.

Requesting Official Order Forms

Official Order Forms can be initially requested by checking "block 3" on the application for new registration (DEA Form-224). There is no charge. Send the form to:

Drug Enforcement Administration
Registration Unit
Central Station
P.O. Box 28083
Washington, D.C. 20038-8083

Once a registrant has received Official Order Forms (DEA Form-222), a separate requisition form (DEA Form-222a) will be mailed to the registrant to request

additional Official Order Forms. The registrant may also request Official Order Forms by calling either the DEA Headquarters Registration Unit (toll free: 1-800-882-9539) or the nearest DEA Registration Field Office.

Each book of DEA Official Order Forms consists of seven sets of forms. Each pharmacy is provided a maximum of six books at one time unless its needs exceed this limit. In such a case, the pharmacy should contact the DEA Registration Field Office serving their state.

Completing Official Order Forms

When ordering Schedule II substances, the pharmacist is responsible for filling in the number of packages, the size of the package and the name of the item. Each Official Order Form must be signed and dated by a person authorized to sign a registration application. (See Power of Attorney to Sign an Official Order Form) When the items are received, the pharmacist must document on the purchaser's copy (copy 3) the actual number of packages received and the date received.

Official Order Forms must be maintained separately from the pharmacy's other business records. However, this does not preclude a registrant from attaching a copy of the supplier's invoice to the related Order Form.

The Code of Federal Regulations requires that the Official Order Form must be "complete, legible, and properly prepared, with no signs of alteration, erasure or change of any description." A supplier may refuse to accept an order for any of these reasons. However, DEA has acknowledged some minor changes or alterations may be accepted by a supplier. For example, suppliers may correct Official Order Forms that have:

Minor errors, which lack inconsequential information or an incorrect date unintentionally annotated by the purchaser.

If an order is refused, the supplier should return Official Order Form copies 1 and 2 to the purchaser with a statement explaining the reason the order was refused.

DEA policy does not preclude the substitution of identical products differing in packaging size from those initially ordered, provided that the actual quantity received does not exceed the amount initially ordered and that the National Drug Code number reflected is that of the actual product shipped. For example, a distributor may substitute 5 bottles of 100, 2mg tablets for 1 bottle of 500, 2mg tablets or any variation thereof.

Power of Attorney to Sign an Official Order Form

Any registrant (pharmacy) may authorize one or more individuals, whether or not they are located at the registered location, to obtain and execute Official Order

Forms by granting a power of attorney to each such individual. The power of attorney must be signed by the same person who signed the most recent application for registration or renewal registration, as well as the individual being authorized to obtain and execute Official Order Forms. The power of attorney may be revoked at any time by the person who signed the power of attorney. It is necessary to grant a new power of attorney when the pharmacy completes a renewal registration, only if the renewal application is signed by a different person. The power of attorney should be filed with executed Official Order Forms as a readily retrievable record. The power of attorney is not submitted to DEA.

Suggested formats for granting and revoking power of attorney follow:

POWER OF ATTORNEY FOR DEA ORDER FORMS

_____ (Name of registrant)
_____ (Address of registrant)
_____ (DEA registration number)

I, _____ (name of person granting power), the undersigned, who is authorized to sign the current application for registration of the above named registrant under the Controlled Substances Act or Controlled Substances Import and Export Act, have made, constituted, and appointed, and by these present, do make, constitute, and appoint _____ (name of attorney-in-fact), my true and lawful attorney for me in my name, place, and stead, to execute applications for books of official order forms and to sign such order forms in requisition for Schedule I and II controlled substances, in accordance with Section 308 of the Controlled Substances Act ([21 U.S.C. 828](#)) and [part 1305](#) of Title 21 of the Code of Federal Regulations. I hereby ratify and confirm all that said attorney shall lawfully do or cause to be done by virtue hereof.

(Signature of person granting power) I, _____ (name of attorney-in-fact), hereby affirm that I am the person named herein as attorney-in-fact and that the signature affixed hereto is my signature.

Witnesses:

- 1. _____
- 2. _____

Signed and dated on the ____ day of _____ in the year ____ at _____.

Appendix H

DEA FORM-222

U.S. OFFICIAL ORDER FORM - SCHEDULES I & II

See Reverse of PURCHASER'S Copy of Instructions		No order form may be issued for Schedule I and II substances unless a completed application form has been received, (21 CFR 1305.04).				OMB APPROVAL No. 1117-0010			
TO: <i>(Name of Supplier)</i>			STREET ADDRESS						
CITY and STATE		DATE		TO BE FILLED IN BY SUPPLIER					
				SUPPLIER'S DEA REGISTRATION No.					
L I N E N o.	TO BE FILLED IN BY PURCHASER						National Drug Code	Packages Shipped	Date Shipped
	No. of Packages	Size of Package	Name of Item						
1									
2									
3									
4									
5									
6									
7									
8									
9									
10									
LAST LINE COMPLETED <i>(MUST BE 10 OR LESS)</i>			SIGNATURE OR PURCHASER OR ATTORNEY OR AGENT						
Date Issued		DEA Registration No.		Name and Address of Registrant					
Schedules									
Registered as a		No. of this Order Form							

DEA Form-222
(Oct. 1992)

U.S. OFFICIAL ORDER FORMS - SCHEDULES I & II
 DRUG ENFORCEMENT ADMINISTRATION
SUPPLIER'S Copy 1