

Client Alert: Effective 1/1/2019 – Unique Serialized Numbers Required on Controlled Substance Security Prescription Forms

[The Medical Board has just issued a notice](#) regarding a new law that will go into effect on January 1, 2019. The new law states that:

1. **Each controlled substance security prescription form used for prescribing on or after that date to include a unique serialized number in a format approved by the Department of Justice. See Health & Safety Code § 11162.1(a)(5).**
2. **No person shall prescribe a controlled substance on or after January 1, 2019, nor fill, compound, or dispense a prescription for a controlled substance written substance written on or after that date, without this security feature. See Health & Safety Code § 11164(a).**

There is **no transition or grandfathering period** to allow for the continued use of the old controlled substance prescription forms on or after January 1, 2019. The new security forms will be the exclusive means to write paper prescriptions for controlled substances as of January 1, 2019, and, as of that date, any prescription written on a prescription form that does not bear all of the necessary security features (of which there are 15) will be presumptively invalid. It is anticipated that this will place pharmacists and pharmacies in an uncomfortable position of having to decide between providing the needed medications to patients and compliance with the law.

[Click here to view the Medical Board Notice](#)

For questions regarding this update, please contact:

[Sarvnaz \(Miriam\) Mackin](#)

Attorney

310-203-2800

smackin@nelsonhardiman.com