



To: Board Members

Subject: Agenda Item XI. Executive Officer’s Report

a. Biannual Report of the California Practice Standards and Jurisprudence Examination for Pharmacists (CPJE) Examination Statistics and the North American Pharmacist Licensure Examination (NAPLEX)

Attachment 1

Examination scores for the California Practice Standards and Jurisprudence Examination for Pharmacists (CPJE) and North American Pharmacist Licensure Examination (NAPLEX) are released twice a year, generally in spring and fall.

The Semi-Annual CPJE statistical report for October 2017 through March 2018 reflects that the overall pass rate for the CPJE is 51.8 percent. The pass rate for graduates from the California schools of pharmacy is 63.60 percent. The overall pass rate for the NAPLEX is 88.5 percent. A copy of the Semi-Annual CPJE Statistical Report is provided in **Attachment 1**.

CPJE: Overall Pass Rates		
	Frequency	Percent
Fail	419	48.2
Pass	451	51.8
Total	870	100.0

NAPLEX: Overall Pass Rates		
	Frequency	Percent
Fail	91	11.5
Pass	702	88.5
Total	793	100.0

5 Year Comparison of CPJE and NAPLEX Pass Rates (Percentage)					
	CPJE			NAPLEX	
	Fail	Pass		Fail	Pass
April 2013 – Mar. 2014	19.9	80.1		4.5	95.5
April 2014 – Mar. 2015	21.3	78.7		4.3	95.7
April 2015 – Mar. 2016	21.6	78.4		5.8	94.2
*April 2016 – Mar. 2017	34.6	65.4		10.1	89.9
April 2017 – Mar. 2018	29.7	70.3		7.9	92.1

***New content outline in effect**

b. Report on the California Pharmacists Association’s 2018 Western Pharmacy Exchange

The California Pharmacists Association’s annual meeting, Western Pharmacy Exchange, was held in San Diego on April 13-15, 2018. Board Member Victor Law attended, as did the

executive officer. The executive officer provided the board’s “2018 Pharmacy Law Update” twice during the meeting, and she staffed an information booth on two days with Chief of Enforcement Tom Lenox and Inspector Chris Woo.

c. Update on the Controlled Substance Utilization Review and Evaluation System (CURES)

Attachment 2

As of March 31, 2018, there were 41,787 dispensers and 135,415 prescribers registered in CURES; 24 percent of the registered individuals are dispensers. **Attachment 2** contains additional statistics on CURES use and registration.

As reflected below, pharmacists remain the primary users of the system:

- 729,892 patient activity reports were run by pharmacists in March 2018. This reflects 57 percent of all patient activity reports run that month (1,244,505).
- Pharmacists accessed CURES 299,288 times in March 2018. This reflects 59 percent of the 505,727 total times the system was accessed.

The table below illustrates the number of prescriptions reported into CURES for the first three months of 2018.

Prescriptions Reported Into CURES, January March 2018	
Schedule II Medications	4,795,866
Schedule III Medications	862,548
Schedule IV Medications	4,917,610

The California Department of Justice certified the CURES 2.0 system on April 2, 2018. This also means that on October 2, 2018, prescribers will be required, with some exceptions, to check CURES before prescribing Schedule II, III or IV drugs to a patient for the first time (pursuant to provisions enacted in 2016 by Lara, Chapter 708). These provisions can be found in Health and Safety Code section 11165.4.

The board will soon release a subscriber alert to inform pharmacists about the requirements for prescribers to check CURES before prescribing these medications. A copy of the subscriber alert is provided in **Attachment 2**.

d. Ratification of Trainings That Satisfy the Law and Ethics Continuing Education Requirements

A recent change in continuing education requirements mandates that effective July 1, 2019, at least two of the 30 units required for pharmacist license renewal be obtained by participation in a board-provided continuing education course. The specific requirement is provided below:

§1732.5 Renewal Requirements for Pharmacists

- (a) Except as provided in Section 4234 of the Business and Professions Code and Section 1732.6 of this Division, each applicant for renewal of a pharmacist license shall submit proof satisfactory to the board, that the applicant has completed 30 hours of continuing education in the prior 24 months.
- (b) At least two (2) of the thirty (30) hours required for pharmacist license renewal shall be completed by participation in a Board provided CE course in Law and Ethics. Pharmacists renewing their licenses which expire on or after July 1, 2019, shall be subject to the requirements of this subdivision.**
- (c) All pharmacists shall retain their certificates of completion for four (4) years following completion of a continuing education course

During prior meetings, the board has agreed to allow the following board provided programs to count towards the required two hours of law and ethics.

- 2018 Pharmacy Law Update. This program has been provided live multiple times and has been recorded for placement in the future on the board's website.
- 2018 Pharmacy Ethics Update. This program is currently being developed by board staff.
- Joint DEA and Board of Pharmacy Prescription Drug Abuse Seminar.

Board staff is requesting the board consider if it would be appropriate to include two additional ways for pharmacists to fulfill the law and ethics requirement.

- Reading and responding to written questions about the board's newsletter, *The Script*. **Note:** The Communication and Public Education Committee is currently discussing how to implement this program.
- Attending a board or committee meeting. Pharmacists earn six hours of CE for attending a board meeting and two hours of CE for attending a committee meeting.

e. Report on Activities Relating to Internet Sales of Prescription Drugs and Opioids

The executive officer continues to be involved in activities that focus on educating consumers on the dangers of purchasing drugs online and finding ways to make it safer for consumers to purchase medications from the internet. This includes her participation as a member of the National Associations of Boards Of Pharmacy's (NABP) .pharmacy (pronounced dot pharmacy) executive board.

Below is an excerpt from an NABP report titled "Internet Drug Outlet Identification Program Progress Report for State and Federal Regulators: February 2018."

Controlled prescription drugs are increasingly being counterfeited using fentanyl and sold illegally, often online. Several popular controlled substances (CS),

including opioids, connected with recent overdose deaths – oxycodone, Percocet®, Xanax®, and Norco® – have been found to be counterfeit and contain fentanyl.

Contributing to the spread of the problem, CS, including these often-counterfeited drugs, are readily available for purchase from rogue internet drug outlets and direct-to-consumer shipment through the international postal system. These illegal drug sites are notorious for selling unapproved, substandard, counterfeit, and falsified medicine. A recent U.S. Senate report raises concerns about how easy it is to buy illicit, mail-order opioids online.

Investigators for the Senate’s Permanent Subcommittee on Investigations posed as would-be online buyers, entering terms like “fentanyl for sale” into Google and used payment information to track more than 500 US-linked transactions from these illegal sites. While search engines regularly screen online advertisers to prevent them from promoting their drug trafficking operations on their paid advertising platforms, rogue drug sellers continue to rise to the top of organic, unpaid search results, contributing to the drugs’ availability and exacerbating the opioid crisis.

To illustrate the availability of popular CS including opioids online, the National Association of Boards of Pharmacy® (NABP®) evaluated 100 websites selling medication to patients in the United States during the second half of 2017. All were found to be operating illegally, offering prescription-only medicine without a prescription (98%) and/or selling unapproved drug products (76%). More than half of them (54%) offered CS, and 40% offered one or more of the drugs frequently counterfeited with fentanyl.

These 100 sites have been added to the growing list of more than 11,000 drug sites NABP has found to be operating out of compliance with US federal and state pharmacy laws and practice standards. In all, nearly 96% of the total number of sites NABP has evaluated since 2008 have been found to be out of compliance with these laws and standards.

The executive officer has also been working with the Alliance for Safe Online Pharmacies to develop public information about the dangers of purchasing drugs online in order to save money on prescription medication. This group develops information and discusses the dangers of seeking drugs from such locations as “Canada Drugs” with policy makers.

f. Personnel Update

Recent Hires/Transfers/Promotions

- Anna Kalantar promoted to Supervising Inspector over one of the Sterile Compounding teams.

- Charlissa Strong joined the board as an SSM II over Admin A and Admin B units.
- Ann Altamirano joined the board as an Office Technician in Reception.
- Keshia Mallard joined the Cashiering unit as an Office Technician.
- Angie Acosta promoted to AGPA in Licensing Unit A.
- Aimee Hoang joined the board as an SSA in Licensing Unit A.
- Nikky Le joined the board as an SSA for Admin A.
- Brynn Thomison joined the board as a Seasonal Clerk in Admin B.
- Michelle Rose joined the board as an SSA in Licensing Unit B.

Departures

- Kevin Dong, Inspector, left the board in January.
- Amparo Nisi, AGPA, retired in February.
- Julie Soto, Office Technician, left the board in March.
- Jennifer Hall, Inspector, left the board in March.
- Sydney Truong, Inspector, left the board in March.
- Mercedes Pascual, Seasonal Clerk, left the board in April.
- Brazil Smith, Seasonal Clerk, left the board in April.

Recruitments

- Three Inspectors for the Compounding teams.
- One Inspector for the Outsourcing team.
- One Inspector for the Drug Diversion and Fraud team.
- One Inspector for the Compliance team.
- One Office Assistant (General) for Licensing Unit B.

Attachment 1

**California State Board of Pharmacy
CPJE Statistics
October 2017 – March 2018**

The charts below display data for all candidates who took the CPJE examination between October 2017 to March 2018, inclusive.

The board also displays NAPLEX scores associated with any candidate who took the CPJE during this six-month period and was reported to the board, regardless of when the NAPLEX may have been taken (it could have occurred outside the six-month reporting period noted above). Typically, the board reports CPJE performance data at six-month intervals.

Overall Pass Rates

<i>CPJE P/F</i>	Frequency	Percent
Valid F	419	48.2
P	451	51.8
Total	870	100.0

<i>NAPLEX P/F</i>	Frequency	Percent
Valid F	91	11.5
P	702	88.5
Total	793	100.0

Location of School

		CJPE P/F		
		F	P	Total
California	Count	51	89	140
	% within school	36.4%	63.6%	100.0%
Other US	Count	336	308	644
	% within school	52.2%	47.8%	100.0%
Foreign	Count	32	53	85
	% within school	37.6%	62.4%	100.0%
Unclassified	Count	0	1	1
	% within school	0.0%	100.0%	100.0%
Total	Count	419	451	870
	% within school	48.2%	51.8%	100.0%

		NAPLEX P/F		
		F	P	Total
California	Count	16	110	126
	% within school	12.7%	87.3%	100.0%
Other US	Count	66	522	588
	% within school	11.2%	88.8%	100.0%
Foreign	Count	9	69	78
	% within school	11.5%	88.5%	100.0%
Unclassified	Count	0	1	1
	% within school	0.0%	100.0%	100.0%
Total	Count	91	702	793
	% within school	11.5%	88.5%	100.0%

Gender

		CJPE P/F		
		F	P	Total
F	Count	252	274	526
	% within gender	47.9%	52.1%	100.0%
M	Count	167	177	344
	% within gender	48.5%	51.5%	100.0%
Total	Count	419	451	870
	% within gender	48.2%	51.8%	100.0%

		NAPLEX P/F		
		F	P	Total
F	Count	59	421	480
	% within gender	12.3%	87.7%	100.0%
M	Count	32	281	313
	% within gender	10.2%	89.8%	100.0%
Total	Count	91	702	793
	% within gender	11.5%	88.5%	100.0%

California Schools

		CJPE P/F		Total
		F	P	
UCSF	Count	4	15	19
	% within school	21.1%	78.9%	100.0%
UOP	Count	17	18	35
	% within school	48.6%	51.4%	100.0%
USC	Count	6	7	13
	% within school	46.2%	53.8%	100.0%
Western	Count	5	10	15
	% within school	33.3%	66.7%	100.0%
Loma Linda	Count	2	12	14
	% within school	14.3%	85.7%	100.0%
UCSD	Count	2	2	4
	% within school	50.0%	50.0%	100.0%
Touro U	Count	3	7	10
	% within school	30.0%	70.0%	100.0%
Cal Northstate	Count	7	9	16
	% within school	43.8%	56.2%	100.0%
Total	Count	46	80	126
	% within school	36.5%	63.5%	100.0%

		NAPLEX P/F		
		F	P	Total
UCSF	Count	1	18	19
	% within school	5.3%	94.7%	100.0%
UOP	Count	5	30	35
	% within school	14.3%	85.7%	100.0%
USC	Count	2	11	13
	% within school	15.4%	84.6%	100.0%
Western	Count	2	13	15
	% within school	13.3%	86.7%	100.0%
Loma Linda	Count	2	12	14
	% within school	14.3%	85.7%	100.0%
UCSD	Count	0	4	4
	% within school	0.0%	100.0%	100.0%
Touro U	Count	1	9	10
	% within school	10.0%	90.0%	100.0%
Cal Northstate	Count	3	13	16
	% within school	18.8%	81.2%	100.0%
Total	Count	16	110	126
	% within school	12.7%	87.3%	100.0%

US Schools of Pharmacy

	JPE P/F		Total
	F	P	
Auburn	2	1	3
Samford	0	1	1
U of AZ	2	1	3
U of AR	0	2	2
UCSF	4	16	20
U of Pacific	19	21	40
USC	8	7	15
U of CO	12	6	18
U of Conn	3	2	5
Howard DC	1	5	6
FL A&M	2	2	4
U of FL	4	4	8
Mercer	2	2	4
U of GA	0	1	1
Idaho SU	2	3	5
U of IL Chi	4	9	13
Butler U	1	5	6
Purdue	2	6	8
Drake	0	4	4
U of IA	1	0	1
U of KS	0	4	4
U of KY	2	1	3
NE LA U	2	1	3
Xavier	3	0	3
U of MD	7	7	14
MA Col Pharm	18	15	33
NE-MA	2	5	7
Ferris	2	0	2
U of MI	2	2	4
Wayne SU	2	0	2
U of MN	6	2	8
U of MS	0	3	3
St. Louis Col of PH	5	4	9
UMKC	0	2	2

U of MT	1	0	1
Creighton	6	2	8
U of NE	2	0	2
Rutgers	5	5	10
U of NM	1	2	3
Western	5	10	15
Midwestern U Chicago	9	11	20
A&M Schwartz	3	3	6
St. Johns	7	4	11
SUNY-Buff	5	5	10
Union U	6	4	10
UNC	2	1	3
ND SU	1	3	4
OH Nrthrn U	0	2	2
U of Cinn	0	1	1
U of Toledo	3	3	6
SW OK State	0	1	1
U of OK	0	2	2
OR State U	1	1	2
Duquesne	4	1	5
PhI C of Pharm	3	5	8
Temple	3	3	6
U of Pitt	2	3	5
U of RI	4	0	4
SD SU	1	0	1
U of TN	1	0	1
TX SO U	1	1	2
U of Hous	2	2	4
U of TX	1	3	4
U of UT	5	2	7
Med C of VA	1	3	4
U of WA	3	6	9
WA State U	3	3	6
Campbell U	1	0	1
Nova Southeastern	2	2	4
Wilkes University	0	1	1
Bernard J Dunn	4	4	8
Midwestern AZ	16	10	26

Nevada College of Pharm	14	14	28
Loma Linda U	3	13	16
UCSD	2	2	4
MA School of Pharm - Worcester	12	20	32
Palm Beach Atlantic University	3	0	3
Lake Erie Col	10	11	21
Touro U	3	9	12
U of Charleston	4	4	8
South U School of Pharm	2	0	2
Pac U of Or	7	8	15
Wingate U	4	1	5
U of Findlay	1	0	1
U of Incarnate Word	0	1	1
Sullivan U	5	1	6
Cal Northstate	7	11	18
Unclassified	0	1	1
Other/FG	32	53	85
U of HI - Hilo	19	10	29
NE Ohio Universities	0	1	1
Texas A&M	1	1	2
Thomas Jefferson U	2	0	2
Belmont U	1	1	2
Husson U	5	1	6
Appalachian College of Pharm	2	1	3
Lipscomb U	1	1	2
Chicago St U	11	0	11
U of New England	5	4	9
Regis University	3	3	6
Notre Dame of MD	3	0	3
St. John Fisher	2	1	3
Concordia U Coll Pharm	2	1	3
Rosalind Franklin U	1	0	1

U of Saint Joseph	2	1	3
Roosevelt U	0	4	4
Presbyterian	2	0	2
D'Youville	2	1	3
Touro New York	5	6	11
South College	1	2	3
Manchester U	0	4	4
SIUE	0	2	2
Fairleigh Dickinson	0	1	1
Cedarville U	0	1	1
U of the Sciences	5	2	7
UNTX Col of Pharm	1	0	1
Total	419	451	870

Country

		JPE P/F		
		F	P	Total
country	United Arab Emirates	1	0	1
	Armenia	0	1	1
	Canada	0	1	1
	E&W Germany	1	1	2
	Egypt	6	17	23
	Eritrea	0	1	1
	Ethiopia	0	1	1
	France	0	1	1
	United Kingdom	0	1	1
	Ghana	1	0	1
	India	5	2	7
	Iraq	2	3	5
	Iran	2	0	2
	Japan	1	0	1
	Jordan	1	4	5
	Lebanon	0	2	2
	Nigeria/New Guinea	1	1	2
	Philippines	7	10	17
	Pakistan	0	1	1
	Poland	2	0	2
	Russia	0	1	1
	Syria	2	4	6
	UK	0	1	1
	USA	387	397	784
	South Africa	0	1	1
Total		419	451	870

Attachment 2

DOJ Certifies CURES for Statewide Use;

Mandatory Use by Prescribers Begins Oct. 2, 2018

On April 2, 2018, the California Department of Justice (DOJ) certified that CURES is ready for statewide use. Pursuant to [Health and Safety Code section 11165.4\(e\)](#), beginning Oct. 2, 2018, certain health care practitioners must consult CURES before prescribing a Schedule II, III or IV controlled substance

- for the first time, and
- at least every four months thereafter, if the controlled substance remains part of the patient's treatment plan.

The requirement applies to health care practitioners who are authorized to prescribe, order, administer or furnish controlled substances, including:

- Dentists
- Physicians
- Naturopathic doctors
- Optometrists
- Osteopathic doctors
- Physician assistants
- Podiatrists
- Registered certified nurse midwives (furnishing)
- Registered nurse practitioners (furnishing)

The mandatory CURES review requirement **does not apply to pharmacists** (or veterinarians). Nevertheless, pharmacists already are heavily using the database to prevent the diversion and abuse of controlled substances. As of March 31, 2018, pharmacists make up 24 percent of all health care providers registered to use CURES. In addition, pharmacists ran 57 percent of all patient activity reports that were reviewed in CURES in March 2018.

The Medical Board of California has established a webpage with information for prescribers, including exemptions to consulting CURES.

The Board of Pharmacy provides resources and links to websites related to CURES for licensees at www.pharmacy.ca.gov/licensees/cures. The DOJ provides information about CURES registration, user guides and frequently asked questions found at www.oag.ca.gov/cures.

For questions about CURES or training requests, contact the CURES at CURES@doj.ca.gov or (916) 210-3187.

###

Registration & Usage Stats

Registered Users: 1/1/2018 - 3/31/2018

	JAN	FEB	MARCH
Total Registered Users	178,134	179,038	180,210
Clinical Roles			
Prescribers	133,502	134,359	135,415
Dispensers	41,595	41,723	41,787
Sub-Total A	175,097	176,082	177,202
License Type			
Doctor of Podiatric Medicine	1,149	1,154	1,160
Registered Nurse Practitioner/Nurse Midwife	11,799	11,915	12,030
Medical Doctor	94,167	94,400	94,658
Naturopathic Doctor	176	182	193
Osteopathic Doctor	5,753	5,796	5,826
Physician Assistant	7,968	8,040	8,088
Doctor of Optometry	588	588	588
Pharmacist	41,120	41,248	41,307
Doctor of Dental Surgery/Dental Medicine	8,727	9,096	9,662
Doctor of Veterinary Medicine	2,669	2,689	2,707
Other (Non-Specified License Type)	981	974	983
Sub-Total B	175,097	176,082	177,202
Other Roles			
LEAs	1,253	1,219	1,240
Delegates	1,651	1,615	1,612
DOJ Administrators	13	13	15
DOJ Analysts	32	32	32
Regulatory Board	88	76	109
Sub-Total C	3,037	2,956	3,008

NOTE:

1. Subtotal A = Subtotal B
2. Subtotal A + Subtotal C = Total Registered Users
3. Stats are from the 1st of the month to the last day of the month



Registration & Usage Stats Continued

Number of PARs Ran: 1/1/2018 - 3/31/2018

	JAN	FEB	MAR
Total PARs Ran	1,172,666	1,077,816	1,249,126
Clinical Roles			
Prescribers	503,288	458,145	513,153
Dispensers	665,647	616,275	731,352
Sub-Total A	1,168,935	1,074,420	1,244,505
License Type			
Doctor of Podiatric Medicine	249	243	328
Registered Nurse Practitioner/Nurse Midwife	68,302	63,604	73,875
Medical Doctor	315,548	284,848	73,875
Naturopathic Doctor	4	21	11
Osteopathic Doctor	38,739	34,985	39,242
Physician Assistant	78,180	72,286	83,634
Doctor of Optometry	0	2	0
Pharmacist	664,149	614,900	729,892
Doctor of Dental Surgery/Dental Medicine	1,274	1,259	1,410
Doctor of Veterinary Medicine	33	17	51
Other (Non-Specified License Type)	2,457	2,255	2,664
Sub-Total B	1,168,935	1,074,420	1,244,505
Other Roles			
LEAs	203	193	187
Delegates	2,325	2,146	2,637
DOJ Administrators	97	142	402
DOJ Analysts	310	76	152
Regulatory Board	796	839	1,243
Sub-Total C	3,731	3,396	4,621

NOTE:

1. Subtotal A = Subtotal B
2. Subtotal A + Subtotal C = Total PARs Ran
3. Stats are from the 1st of the month to the last day of the month



Registration & Usage Stats Continued

Times System was Accessed: 1/1/2018 - 3/31/2018

		JAN	FEB	MAR
Total Times System was Accessed		474,642	435,839	509,237
Clinical Roles				
Prescribers		196,589	178,780	205,829
Dispensers		274,756	254,187	299,898
Sub-Total A		471,345	432,967	505,727
License Type				
Doctor of Podiatric Medicine		212	243	308
Registered Nurse Practitioner/Nurse Midwife		28,874	25,570	29,639
Medical Doctor		123,302	111,540	127,339
Naturopathic Doctor		24	27	15
Osteopathic Doctor		16,540	14,926	16,808
Physician Assistant		26,637	24,327	28,963
Doctor of Optometry		78	53	38
Pharmacist		274,177	253,687	299,288
Doctor of Dental Surgery/Dental Medicine		1,258	1,512	1,973
Doctor of Veterinary Medicine		207	157	218
Other (Non-Specified License Type)		1,039	925	1,138
Sub-Total		471,345	432,967	505,727
Other Roles		BBB B BB		
LEAs		471	414	407
Delegates		1,634	1,399	1,688
DOJ Administrators		213	185	363
DOJ Analysts		695	592	677
Regulatory Board		284	282	375
Sub-Total C		3,297	2,872	3,510

NOTE:

1. Subtotal A = Subtotal B
2. Subtotal A + Subtotal C = Total Times System was Accessed
3. Stats are from the 1st of the month to the last day of the month



Help Desk Stats

Number of CURES Help Desk Requests

	JAN	FEB	MAR
Emails [Note: Email requests are not included in the breakdown below]	1,471	1,733	1,698
Total Phone Calls	1,853	1,641	1,876
Clinical Roles			
Prescribers	1,177	1,091	1,201
Dispensers	653	538	660
Sub-Total A	1,830	1,629	1,861
License Type			
Doctor of Podiatric Medicine	9	3	3
Registered Nurse Practitioner/Nurse Midwife	146	125	127
Medical Doctor	784	732	811
Naturopathic Doctor	3	8	2
Osteopathic Doctor	57	50	48
Physician Assistant	109	83	81
Doctor of Optometry	2	2	1
Pharmacist	653	538	660
Doctor of Dental Surgery/Dental Medicine	49	70	103
Doctor of Veterinary Medicine	18	18	25
Other (Non-Specified License Type)	0	0	0
Sub-Total B	1,830	1,629	1,861
Other Roles			
LEAs	7	4	6
Delegates	15	7	6
DOJ Administrators	0	0	0
DOJ Analysts	0	0	0
Regulatory Board	1	1	3
Sub-Total C	23	12	15

NOTE:

1. Subtotal A = Subtotal B
2. Subtotal A + Subtotal C = Total Help Desk Phone Calls

Number of RXs filled by Schedule Stats

Number of Prescriptions Filled by Schedule			
	JAN	FEB	MAR
Schedule II	1,726,990	1,480,870	1,588,006
Schedule III	310,252	264,141	288,155
Schedule IV	1,761,696	1,506,128	1,649,786
Schedule V	72,753	50,045	49,681
R	13,008	12,237	13,185
Unknown	43,297	39,207	43,023
TOTAL	3,927,996	3,352,628	3,631,836

NOTE:
 1. R = Not classified under the Controlled Substances Act; includes all other prescription drugs
 2. Unknown = Over the counter product

