

**Question:** Is tramadol a controlled substance which contains an opioid?

**Response:** The text for the emergency regulations for the prescribing of controlled substances for acute or chronic pain states the following:

***18VAC105-20-5. Definitions.***

*The following words and terms when used in this chapter shall have the following meanings unless the context clearly indicates otherwise:*

*"Controlled substance" means drugs listed in The Drug Control Act (§ 54.1-3400 et seq. of the Code of Virginia) in Schedules II through V.*

The Drug Enforcement Administration (DEA), the Centers for Disease Control and Prevention (CDC) and the Ultram® package insert indicate that tramadol is a controlled substance which contains an opioid. Links to the supporting documentation is provided below.

The **DEA** states the following (to review complete text, go to [https://www.deadiversion.usdoj.gov/drug\\_chem\\_info/tramadol.pdf](https://www.deadiversion.usdoj.gov/drug_chem_info/tramadol.pdf)):

***Introduction:***

*Tramadol was approved for marketing in the United States as a noncontrolled analgesic in 1995 under the trade name of Ultram®. However, soon after its approval there have been reports of diversion and abuse of tramadol. This led to revisions to the product labeling and the addition of warnings about its abuse by the Food and Drug Administration (FDA). Tramadol is an opioid analgesic and opioid activity is the overriding contributor to its pharmacological effects. Abuse and adverse events of tramadol are similar to those of other opioid analgesics.*

The **CDC** states the following (to review complete text, go to <https://www.cdc.gov/drugoverdose/data/analysis.html>):

**Categories of opioids**

CDC looks at four categories of opioids:

1. **Natural opioid analgesics**, including morphine and codeine, and **semi-synthetic opioid analgesics**, including drugs such as oxycodone, hydrocodone, hydromorphone, and oxymorphone;
2. **Methadone**, a synthetic opioid;
3. **Synthetic opioid analgesics** other than methadone, including drugs such as tramadol and fentanyl; and
4. **Heroin**, an illicit (illegally-made) opioid synthesized from morphine that can be a white or brown powder, or a black sticky substance.

The **Ultram®** package insert states the following (to review complete text, go to [https://www.janssen.com/us/sites/www\\_janssen\\_com\\_usa/files/products-documents/ultramer.pdf](https://www.janssen.com/us/sites/www_janssen_com_usa/files/products-documents/ultramer.pdf)):

***CLINICAL PHARMACOLOGY***

***Mechanism of Action***

*ULTRAM ER is a centrally acting synthetic opioid analgesic. Although its mode of action is not completely understood, from animal tests, at least two complementary mechanisms appear applicable: binding of parent and M1 metabolite to  $\mu$ -opioid receptors and weak inhibition of reuptake of norepinephrine and serotonin.*