

# *Practitioner Diversion Awareness Conference*

## Registration

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# Course Objectives

- § **Explain why the DEA issues registrations, the type of registrations that the DEA issues, and how registrations fit into the closed system of distribution.**
- § **Explain how a practitioner goes about obtaining a DEA registration, and what is required by the DEA as part of this process.**
- § **Explain the limits of a DEA registration, and the coincident activities a practitioner can perform.**



# Course Objective

- § **Outline when a practitioner would need more than one DEA registration.**
- § **Review some common problems practitioners have encountered regarding their DEA registration.**
- § **Explain some of the basic steps a practitioner can take to reduce the chance of their DEA registration being used in the diversion of controlled substances.**



# Questions To Discuss

**At the completion of this block of instruction you will be able to answer the following questions:**

- 1. What is the current number of DEA registrants?**
- 2. As an individual practitioner, how many associates in my practice can I authorize to use my registration number to prescribe controlled substances?**



# Questions To Discuss

- 3. Is a DEA practitioner registration for a three year period?**
- 4. Is a DEA registration number publically available?**
- 5. What should I do to prevent my DEA registration from being used for diversion?**



# Registration Requirements for Practitioners





# Registration Requirements

First, let's begin by clarifying a few points.

§ A DEA registration does **NOT** allow you to prescribe controlled substances anywhere in the United States.



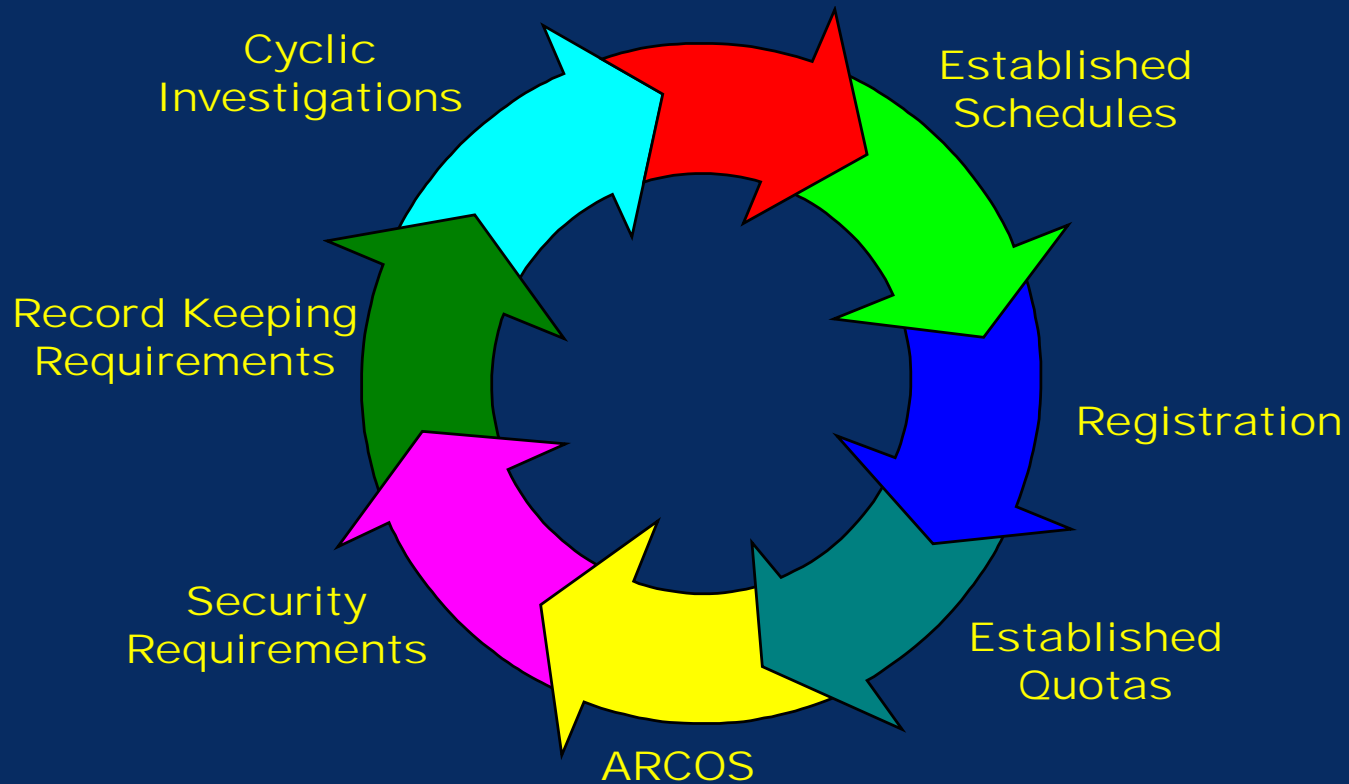


# Registration Requirements

- § A DEA registration is **NOT** required for you to issue prescriptions for non-controlled substances.
- § If you change your last name you are **NOT** required to obtain a new DEA registration number.
- § A DEA registration number is **NOT** privileged information, and is available to the public.



# Closed System of Distribution





# The Registrant Community

§Total number of DEA registrants: **1,746,676**

§Total number of Practitioners: **1,279,381**

§Total number of Mid Level Practitioners: 358,556

§Total number of Pharmacies: 73,545

§Total number of Hospitals: 17,963



# How to Apply

- § **Website: [www.DEAdiversion.usdoj.gov](http://www.DEAdiversion.usdoj.gov)**
- § **Go to “Registration” (located at the top of the page)**
- § **Form used by the new applicant: DEA Form 224**



# How to Apply

What if you encounter problems?

If you encounter problems, contact the DEA  
Registration Service Center.

[DEA.Registration.Help@usdoj.gov](mailto:DEA.Registration.Help@usdoj.gov)

Or

1-800-882-9539

Or . . .



# How to Apply

**Contact the DEA Registration Specialist in your area. To find their contact information go to the above website and look under “About Us.”**

**For example, using this method the Registration Specialist’s contact information for Orlando is  
Phone 1: (800) 667 9752.**



# How to Apply

**The DEA cannot consider an application unless you first have state controlled substance authority, and each state is different:**

**§ State Medical License**

**§ State controlled substance registration (if required)**

**§ Other state licensure (if required)**

**§ Certificates of advanced training (if required)**





# Practice Address vs Mailing Address

**During the application process you are asked for your registered address, and you are asked for your mail-to address if these two addresses are different.**

**Your Practice Address is your principal place of business or professional practice pursuant to Title 21, C.F.R. 1301.12(a). This is the address on your DEA certificate.**

**Your mail-to address is for correspondence.**



# Public Access

**The DEA is required to turn over the registered address to the U.S. Department of Commerce.**

**The Department of Commerce sells this information through the National Technical Information Service to registrants and others.**

**Other companies then can resell this information.**



# DEA Registration Limits

**A DEA registration cannot allow you to do something that is otherwise prohibited by state law.**

**For Example: If you are registered by the state in only schedules II-V the DEA cannot authorize you to handle schedule II.**

**For Example: If state law says you cannot procure controlled substances, the DEA cannot allow you to do so.**



# DEA Registration Limits

## **Final Rule: Clarification of Registration Requirements for Individual Practitioners** (December 1, 2006)

**A practitioner can only administer, dispense, prescribe, procure, or store controlled substances in a state if they first hold a DEA registration in that state. The authority granted under this registration ends at that state's border.**

**A practitioner can only administer, dispense, procure, or store a controlled substance at a location where he or she is registered with the DEA.**



# DEA Registration Limits

**When more than one DEA registration number is needed:**

- § **If a practitioner plans to administer, dispense, procure or store controlled substances at more than one location in a state.**
- § **If a practitioner plans to administer, dispense, prescribe, procure, or store controlled substances in more than one state.**
- § **If the practitioner is registered with the DEA in one state and is treating a patient in another state by telemedicine.**



# DEA Registration Limits

**Unique exception: The Medical Bag.  
Administering or dispensing a controlled  
substance inside a state where a practitioner is  
registered, but at other than the practitioner's  
DEA registered location.**

**Note: Random and as needed is – fact specific**





# DEA Registration Limits

**Coincident Activities allowed.**

[21 C.F.R. 1301.13\(e\)\(1\)\(iv\)](#)

**May conduct research and instructional activities with those substances for which registration was granted, except that a mid-level practitioner may conduct such research only to the extent expressly authorized under state statute.**



# **Common Problems Encountered**

**The applicant does not have appropriate state authority.**

**The registrant assumes their first registration will be for 36 months.**

**The applicant, or renewing registrant, fails to mark all appropriate schedules.**

**The registrant fails to renew their registration in a timely manner.**





# **Common Problems Encountered**

**Failure to maintain state licensure once achieved.**

**Failure to notify the DEA of an address change.**

**Failure to notify the DEA of an email address change.**

**Believing that the practitioner needs a separate DEA registration for each location in the same state where they only prescribe, (other than the one registration they already hold in that state).**



# Common Problems Encountered

**Renewals submitted by both the practitioner and their office.**

**Applying or renewing using an expired credit card or using a check from a closed account.**

**Relying upon an office manager to renew for the practitioner (but they do not).**

**Applying for new DEA # due to a name change.**



# Common Problems Encountered

**Changing practice address:**

**§ In same state**

**§ To another state**

**§ In a national emergency**



# Common Problems Encountered

Going inactive, and what to do with the registration:

Semi-retired

Health Issues

Sabbatical





# Common Problems Encountered

**Discontinuing Practice:**

**Permanently**



# Hospitals and DEA Registrations

## Title 21 C.F.R. § 1301.22(c)(1-6)

**An individual practitioner who is an agent or employee of a hospital or other institution may, when acting in the normal course of business or employment, administer, dispense, or prescribe controlled substances under the registration of the hospital or other institution which is registered in lieu of being registered him/herself, provided that.**



# Hospitals and DEA Registrations

**Using the number off-site:**

**When you can use it off-site**

**When you cannot use it off-site**



# Group Practice Setting

## Title 21 C.F.R. 1301.22(b)

**(b) An individual practitioner who is an agent or employee of another practitioner (other than a mid-level practitioner) registered to dispense controlled substances may, when acting in the normal course of business or employment, administer or dispense (other than by issuance of prescription) controlled substances if and to the extent that such individual practitioner is authorized or permitted to do so by the jurisdiction in which he or she practices, under the registration of the employer or principal practitioner in lieu of being registered him/herself.**





# Group Practice Setting

**What this lets you do**

**What this does not let you do**





# Fee Exempt Registrations

**Conditions under which it is granted**

**Limits of this registration**

**Conversion to a fee paid registration**



# **U.S. Military – DEA Registration**

**Conditions under which it can be used.**

**Conditions under which it cannot be used.**

**When you leave the military.**



# Steps to Reduce Diversion

Steps you can take to reduce the chance of your registration being used in the diversion of controlled substances.

Check your PDMP for use:

- § False prescriptions
- § Sloppy use by pharmacies
- § Misuse by office staff





# Steps to Reduce Diversion

- § **Monitor the use of your practice's credit card and checking account.**
- § **Have all controlled substances you purchase be checked in upon delivery by two employees.**



# Steps to Reduce Diversion

**Conduct random audits of the controlled substances you dispense.**

**Do not create an atmosphere of self-use in your practice by your staff.**





# Steps to Reduce Diversion

**Do not print your full DEA registration number on your prescription but instead add the last few digits yourself.**

**Limit the amount you prescribe and the refills you authorize.**



# Steps to Reduce Diversion

**Stick with certain controlled substances, and strengths.**

**When prescribing, list both the # and write out the amount.**

**Cooperate with your local pharmacists.**

**Do not leave your prescription pad unattended, and lock it up if not in use.**





# Qualified Practitioners and Other Qualified Practitioners

**The Unique Identification Number, often called the X number, is not a DEA registration. It is certification that the prescriber has met all the necessary requirements to use FDA approved Schedules III-V narcotics for the treatment of opioid use disorder.**

**Unlike the DEA registration number, only one Unique Identification Number is issued.**



# Qualified Practitioners and Other Qualified Practitioners

**When prescribing FDA approved Schedules III-V narcotics for the treatment of opioid use disorder the prescriber must place both their DEA registration number and their Unique Identification Number on the prescription.**



# Post Question

1. What is the current number of DEA registrants?
  - A. Under 250,000
  - B. 780, 000
  - C. 1, 100,000
  - D. Over 1,700,000



# Post Question

- 2. As an individual practitioner, how many associates in my practice can I authorize to use my registration number to prescribe controlled substances.**
- A. None**
  - B. One**
  - C. Up to three**
  - D. Up to five**



# Post Question

**3. Is a DEA practitioner registration for a three year period?**

- A. Yes**
- B. No**



# Post Question

- 4. Is a DEA registration number publically available?**
- A. Yes**
  - B. No**



# Post Question

- 5. What should I do to prevent my DEA registration from being used for diversion?**
- A. Lock up my prescription pads.**
  - B. Limit my prescribing to the amount I believe is currently medically necessary.**
  - C. Check my state's prescription monitoring program.**
  - D. All of the above.**



*Thank you for your time  
and attention !*

