



Elson S. Floyd College of Medicine

WASHINGTON STATE UNIVERSITY

Graduate Medical Education Policy

GME DEA REGISTRATION POLICY

Applies to: ESFCOM Graduate Medical Education (GME) Trainees at accredited and non-accredited graduate medical education training programs (i.e. residency or fellowship) sponsored by the College of Medicine

GMEC Approval: February 16, 2021

1.0 Policy Statement:

It is the Elson S. Floyd College of Medicine (ESFCOM) policy that all Trainees participating in a college of medicine sponsored training program, hold an active DEA Registration, and for the jurisdiction they are training if not in Washington, while training in a WSU graduate medical education program.

2.0 Definitions

Accreditation Council for Graduate Medical Education (ACGME): accredits Sponsoring Institutions and residency and fellowship programs, confers recognition on additional program formats or components, and dedicates resources to initiatives addressing areas of importance in graduate medical education.

Designated Institutional Official (DIO): The individual in a sponsoring institution who has the authority and responsibility for oversight and responsibility of all of the ACGME-accredited programs.

Fee-Exempt Drug Enforcement Administration (DEA) registration – A fee-exempt DEA registration is available to Trainees who are licensed by the state and employed at a federal, state or local government official or institution and is exempt from payment of the application fee.

Trainee: a physician in training at an ACGME accredited graduate medical education program, the term includes Interns, Residents, and Fellows or other trainee enrolled in an educational program whose education falls under the purview of the ESFCOM Office of Graduate Medical Education.

3.0 Responsibilities

GMEC and DIO

4.0 Procedures

It is the responsibility of each Trainee, with duties requiring they write prescriptions, to obtain and maintain an active DEA registration while training in a WSU graduate medical education program. Training Program Administrators and the GME Office are available to assist Trainees with questions regarding the application process.

As state employees, Trainees at WSU are eligible and encouraged to apply for the Fee-

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Exempt DEA Registration by using the Washington State University GME Office address and obtaining the required signatures and information. Registration achieved by this means cannot be used for any other purpose other than for the care of patients within the residency program and affiliated hospitals. A waived, or fee-exempt DEA number may not be used in any way for outside professional activities (e.g. "moonlighting"). If a trainee's fee has been waived and the trainee graduates from (or otherwise leaves) the program prior to the expiration of his/her DEA registration, the trainee must notify the local DEA office of any address change and discuss payment to cover the period of time that is not waived.

DEA Registration information will be recorded and tracked by the GME office in MedHub. Trainees who obtain a paid DEA Registration directly from the DEA must provide a copy to the GME office. The DEA Registration's information will be shared with clinical sites to ensure the Trainee can prescribe as needed.

Initial DEA Registration Application: Once the Trainee has begun employment (day one of orientation) and after the medical license is obtained, it is the Trainees' responsibility to submit a completed initial application to the Drug Enforcement Administration via the DEA Registration website (DEA Registration Form 224.) To apply for the Fee-Exempt DEA Registration, Trainees must select "Fee-Exempt" on the application (note: application fees paid in error are not refundable.)

New Trainees who currently hold a DEA Registration issued outside of Washington State must submit a DEA Registration Update Request after the Washington medical license is obtained.

Along with obtaining an individual DEA Registration, Trainees are required to complete training from the Washington State Medical Association on Opioid Prescribing Rules. Certification of completion must be provided to the GME office.

DEA Registration Renewals: Renewal notifications will be sent from the DEA Registration to the contact information provided on the initial DEA Registration application. It is the responsibility of the Trainee to renew their DEA Registration via the DEA Registration website (DEA Registration Form 224a.) Renewals must be submitted within 30 days of the expiration date.

DEA Registration Status: Trainees may not prescribe while their DEA Registration is pending or expired. In such situation, prescriptions must be written by the attending physician or an alternate appropriately authorized provider on the team.

Misuse of DEA Numbers

Misuse of DEA numbers includes, but is not limited to:

1. Using a DEA number to prescribe controlled substances to patients not followed within that training program;
2. Prescribing excessive amounts of controlled substances to any patient;
3. Prescribing controlled substances by a trainee for his/her use or for the use of his/her immediate family;
4. Prescribing controlled substances by a trainee for peers, nursing or hospital

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medical staff, or friends without clear documentation of a physician-patient relationship in the medical record; or

5. Any violations of the provisions of this policy.

If a trainee does not hold a valid personal DEA registration number and/or violates the provisions of the Controlled Substance Act (1970), they may be personally liable for any consequences, penalties, and/or fines resulting from the prosecution of such violations. Misuse of any DEA number will be reported directly to the DIO and could result in disciplinary action up to and including dismissal from the training program. Individuals found misusing hospital assigned or personal DEA numbers must undergo a “for cause” drug screen, and if indicated, a diagnostic and/or therapeutic intervention and subsequent indicated drug screens during the remaining time within the training program.

Rotations outside Washington: For rotations occurring outside the state of Washington, Trainees must obtain an individual DEA Registration specific to the practice address of the outside rotation. Trainees may obtain an institutional DEA Registration dependent on the policies in place at the institution of rotation.

5.0 Related Policies

Resident Appointment Policy

6.0 Key Search Words

DEA Registration, Fee-Exempt DEA Registration

7.0 Revision History

Original GMEC Approval:	Revision Date(s)
2/16/2021	

Responsible Office: ESFCOM GME Office

Policy Contact: Designated Institutional Official

Supersedes: N/A