

Dartmouth Hitchcock Policy Title	Use of Institutional and Personal Drug Enforcement Administration (DEA) Registration Numbers by Residents Participating in an MHMH-Sponsored GME Program	Policy ID	27365
Keywords	GME, resident, fellow, DEA, controlled substance		

I. Purpose of Policy

The purpose of this policy is to define the correct circumstances for the use of an Institutional Drug Enforcement Administration (“DEA”) Registration Number, with Resident-specific Suffixes by Residents participating in Accreditation Council for Graduate Medical Education (ACGME)-accredited residency and fellowship programs sponsored by Mary Hitchcock Memorial Hospital (“MHMH”).

II. Policy Scope

Dartmouth Hitchcock (D-H)	Dartmouth Health System Members
<input checked="" type="checkbox"/> Mary Hitchcock Memorial Hospital <input checked="" type="checkbox"/> Dartmouth-Hitchcock Clinic (Lebanon) <input checked="" type="checkbox"/> Dartmouth-Hitchcock Clinic (Southern CGP)	<input type="checkbox"/> Alice Peck Day Memorial Hospital <input checked="" type="checkbox"/> Cheshire Medical Center/D-H Keene <input type="checkbox"/> Mt. Ascutney Hospital and Health Center <input type="checkbox"/> New London Hospital <input type="checkbox"/> Visiting Nurse and Hospice of VT/NH (VNH)

III. Definitions

- **Accreditation Council for Graduate Medical Education (ACGME):** The organization responsible for accrediting Sponsoring Institutions and the residency and fellowship programs, including those sponsored by MHMH that take place at Dartmouth-Hitchcock (“D-H”). As reflected in Section II above, the term "Dartmouth-Hitchcock" refers to MHMH and Dartmouth-Hitchcock Clinic, which do business collectively as Dartmouth-Hitchcock.
- **Cheshire Visiting Resident:** A resident from Cheshire Medical Center (“Cheshire”) rotating from Cheshire’s ACGME-accredited Family Medicine graduate medical education (“GME”) program to the Pediatrics residency program at MHMH who may, at the discretion of the GME Office and Pediatrics program residency director, be provided with a D-H facility Institutional DEA Registration Number with Suffix so that they can administer, dispense, and prescribe controlled substance medications within

the scope of their training, subject to their fulfillment of applicable GME Office processes, including, but not limited to, review and confirmation of their understanding of applicable Resident policies.

- **Inbound Rotator or Visiting Resident:** A Resident from an external ACGME-accredited training program rotating through an MHMH-sponsored ACGME-accredited GME program, excluding, for purposes of this policy, a Cheshire Visiting Resident.
- **Institutional DEA Registration Number:** A unique number issued by the U.S. Drug Enforcement Administration (“DEA”) to a licensed, eligible facility (e.g., a hospital or clinic) that administers, dispenses, or prescribes controlled substance medications.
- **Institutional DEA Registration Number with Suffix:** A unique number which is a combination of an Institutional DEA Registration Number and a suffix consisting of numbers, letters, or a combination thereof that is unique to the applicable Resident. The Institutional DEA Registration Number with Suffix is to be used by Residents when administering, dispensing, or prescribing controlled substances at only the location to which the Institutional DEA Registration Number with Suffix applies and only where such use is authorized by such location through their policies and procedures. A Resident’s use of an Institutional DEA Registration Number with Suffix is also subject to their scope of practice and any permissions or limitations required or set by their individual GME program.

As detailed in Section IV, “Organization Responsibilities,” Part A of this Policy, a Resident will be notified of the appropriate Institutional DEA Registration Number(s) with Suffix to use in connection with such Resident’s activities at any D-H facility(ies). For the avoidance of doubt, a Resident’s Institutional DEA Registration Number with Suffix is only authorized to be used at the D-H facility to which it corresponds. (For example, the MHMH Institutional DEA Registration Number with Suffix is only authorized to be used at MHMH.)

- **Moonlighting:** Voluntary, compensated, medically-related work by a Resident that is not part of the applicable MHMH-sponsored GME program.
- **Personal DEA Registration Number:** A unique number issued by the DEA to a licensed, eligible practitioner to handle (i.e. administer, dispense, or prescribe) controlled substances.
- **Program Letter of Agreement (“PLA”):** A contract between the Inbound Rotator’s home institution and MHMH.
- **Resident:** Any physician in an ACGME-accredited graduate medical education program sponsored by MHMH, including residents and fellows, and, for or purposes of this policy, Cheshire Visiting Residents.
- **Sponsoring Institution:** The organization (or entity) that assumes the ultimate financial and academic responsibility for a GME program consistent with the ACGME Institutional Requirements.

IV. Policy Statement

Summary: As further detailed in this policy, each Resident is assigned a unique Suffix by

the GME Office. Each D-H facility at which a Resident trains or through which a Resident rotates may have a different Institutional DEA Registration Number or no Institutional DEA Registration Number at all. When a Resident administers, dispenses, or prescribes controlled substances at a D-H facility, the Resident must use the applicable facility's Institutional DEA Registration Number, along with the Resident's unique Suffix. Institutional DEA Registration Numbers are not interchangeable between D-H facilities, nor are Institutional DEA Registration Numbers with Suffixes interchangeable between Residents. If a location through which a Resident rotates does not have an Institutional DEA Registration Number, the Resident is not authorized to prescribe, administer, or dispense controlled substances at such location. Inbound Rotators are not authorized to receive a Suffix from the GME Office or to use a D-H facility's Institutional DEA Registration Number and, as such, are not permitted to administer, dispense, or prescribe controlled substances at a D-H facility. A D-H facility's Institutional DEA Number (with or without Suffix) can never be used in the context of Moonlighting or for any of the prohibited uses set forth in this policy.

Resident Responsibilities

A. Institutional DEA Registration Number with Suffix

1. Authorized Use

A Resident is authorized to use an Institutional DEA Registration Number with Suffix corresponding to a D-H facility when administering, dispensing, or prescribing controlled substances at such D-H facility, provided that:

- a. The applicable Resident is authorized to practice and prescribe based on their status as a trainee in an ACGME-accredited program sponsored by MHMH (or, in the limited circumstance of Cheshire Visiting Residents, an ACGME-accredited program sponsored by Cheshire); and
- b. The activities are done in the usual course of professional practice, including e-prescribing; and
- c. The applicable Resident has received notice of authorization by the applicable D-H facility or the GME Office that they are authorized to administer, dispense, or prescribe under the Institutional DEA Registration Number with Suffix applicable to that particular D-H facility.

2. Prohibited Use

- a. A Resident is not authorized to use a D-H facility Institutional DEA Registration Number with Suffix when the Resident administers, dispenses, or prescribes controlled substances:
 - i. Outside the scope of the ACGME-accredited program sponsored by MHMH; and/or
 - ii. At any facility or institution (whether affiliated with D-H or not) other than the one that corresponds to the applicable

Institutional DEA Registration Number with Suffix. A Resident is required to use the appropriate Institutional DEA Number with Suffix assigned to them for that specific location of practice.

- b. A Resident is further prohibited from using the Institutional DEA Registration Number with Suffix to prescribe controlled substances:
 - i. In violation of federal or state law or institutional policy;
 - ii. For the Resident's own use or for the use of the Resident's immediate family; and/or
 - iii. For any individual who is not registered as a patient, even if the Resident has a physician-patient relationship and completes documentation of care in the patient's medical record.

3. Training at Non-D-H Locations

A Resident who is assigned or authorized to train at any non-D-H facility (even one that is affiliated with D-H) must work with their program coordinator to obtain the receiving non-D-H facility's policy and procedure for use of such non-D-H facility's own Institutional DEA Registration Number, and will only utilize the non-D-H facility-assigned Institutional DEA Registration Number with Suffix when training at that non-D-H facility, and then only as authorized by such non-D-H facility.

4. Misuse of DEA Number

Any misuse of the Institutional DEA Registration Number with Suffix by the Resident is addressed as prescribed by law (including, but not limited to, making any necessary reports to law enforcement or applicable agencies), institutional policy(ies), and ACGME-accredited program procedure, with actions that may include, but are not limited to, loss of authority to use the Institutional DEA Registration Number with Suffix and further disciplinary action including, but not limited to, termination.

B. Personal DEA Registration Number

- 1. A Resident who obtains a Personal DEA Registration Number cannot use it when participating in MHMH-sponsored ACGME-accredited program training. This prohibition includes Cheshire Visiting Residents rotating through an MHMH-sponsored ACGME-accredited program.
- 2. A Resident who Moonlights must obtain a Personal DEA Registration Number for use when Moonlighting. Under no circumstances shall such Resident use a D-H facility Institutional DEA Registration Number or Institutional DEA Registration Number with Suffix while Moonlighting.

C. Inbound Rotators

- 1. An Inbound Rotator is not provided with a D-H Institutional DEA Registration

Number with Suffix when rotating to D-H facilities, and as such is not authorized to administer, dispense, or prescribe controlled substance medications while rotating at D-H facilities.

Organization Responsibilities

A. D-H GME Office

1. The GME Office is responsible for assigning a Suffix (numerical code) to each Resident for use with applicable D-H facility Institutional DEA Registration Numbers as part of the Resident onboarding process. The Suffix:
 - a. Is transmitted along with the corresponding Resident name from the GME Office to System Pharmacy during Resident onboarding;
 - b. Is documented in the Residency Management System by the GME Office or designee and made available at all times to the System Pharmacy, DEA registrants and law enforcement agencies upon request for the purpose of verifying the authority of the prescribing Resident;
 - a. Is valid for the duration of the MHMH-sponsored ACGME-accredited program when used in connection with the Institutional DEA Registration Number of the specific location at which the Resident is training or rotating. The authority to use the applicable Institutional DEA Registration Number with Suffix ceases immediately upon the earlier of graduation or termination from the program. The GME Office or other departments within D-H may periodically audit a Resident's use of their Institutional DEA Registration Number with Suffix to ensure compliance with this and other relevant DEA or GME policies.
 - i. A Resident who Moonlights may not use a D-H facility's Institutional Registration Number when Moonlighting.
2. The Suffix assigned to each Resident:
 - a. Is transmitted by the GME Office or its designee, along with the corresponding Resident's name, to the designated individual at each D-H facility that has an Institutional DEA Registration Number and within which the Resident will train or complete a rotation; and
 - b. Is used by the applicable Resident, in connection with the applicable facility's Institutional DEA Registration Number, at each D-H facility at which the Resident is authorized to prescribe, administer, or dispense controlled substances.

B. D-H Facilities Other than MHMH

Any D-H facility within which a Resident completes an external (i.e., non- MHMH) rotation and which has its own Institutional DEA Registration Number shall:

- a. Verify that the Resident is permitted to administer, dispense, or prescribe drugs within the jurisdiction in which the practice is located;
- b. Authorize the Resident to administer, dispense, or prescribe under the

applicable Institutional DEA Registration Number, adding the Suffix, assigned and transmitted by the GME Office or its designee; and

- c. Keep a current list of Institutional DEA Registration Numbers with Suffix and corresponding Resident names that is made available at all times to the System Pharmacy, DEA registrants and law enforcement agencies upon request for the purpose of verifying the authority of the prescribing Resident.
- d. Provide the current Institutional DEA Registration Number with Suffix to the GME office or its designee for inclusion in the Residency Management System.

C. Non-D-H Facilities

Any non-D-H facility through which a Resident rotates will follow its own process to assign each Resident an Institutional DEA Registration Number with Suffix for use when administering, dispensing, or prescribing controlled substances during their rotation at such non-D-H facility. Under no circumstances shall a Resident use a D-H facility Institutional DEA Registration Number or Institutional DEA Registration Number with Suffix at any non-D-H facilities.

The receiving non-D-H institution will transmit the Institutional DEA Registration Number with Suffix for each Resident to the Resident's program coordinator and to the GME Office as a part of the onboarding and Program Letter of Agreement process for inclusion in the Residency Management System.

Should the non-D-H facility be unable to obtain an Institutional DEA Registration Number, the rotation site director or program administrator will communicate the same to the GME Office and the Resident's program director or program coordinator.

V. References

U.S. Code of Federal Regulations, Title 21, Chapter II, Part 1301, §1301.22

DEA Practitioner's Manual (EO-DEA226, Rev. 2023)

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Related Job Aids:			