Drug Enforcement Administration (DEA) Registration Policy

Scope: All residents and fellows participating in University of Washington (UW) graduate medical education (GME) training programs accredited by the Accreditation Council for Graduate Medical Education (ACGME) or Council on Dental Accreditation (CODA); recognized by the American Board of Medical Specialties (ABMS) Specialty Board; and Senior Fellows/Senior Fellow Trainees in non-ACGME accredited programs who prescribe, order, administer, or handle controlled substances. Residents, fellows, senior fellows and senior fellow trainees are hereafter referred to as “Residents”.

Policy: Residents who prescribe, order, administer, or handle controlled substances are required to obtain and maintain an individual DEA registration. Exemption from payment of an individual registration is limited to federal, state or local government official duties. Registration may be obtained on a fee-exempt basis while training in a UW GME program; however, such registrations are restricted to activities within the scope of the training.

Residents who engage in outside professional activities (e.g., moonlighting) at any site outside of UW Medicine must obtain an individual DEA registration and may not use their fee-exempt registration for this purpose.

Prescribing of Opioid Pain Medication: All residents who prescribe opioids – either for acute or chronic pain – are required to complete one of two opioid prescribing online trainings at the start of their appointment. Program Directors are responsible for determining the appropriate training for their residents.

Procedures: It is the responsibility of the individual resident to obtain and maintain DEA registration.

Initial Registration: Residents must submit an application for an initial DEA registration via the DEA website (DEA Form 224) once their Washington state provider license is issued.

- Registration Type: For Business Activity, select ‘Practitioner’.
- Fee-Exempt Registrations: To apply for a fee-exempt registration, applicants must select “Fee-Exempt” on the application (note: application fees paid in error are not refundable).
  - Certifying Official: Provide the Program Director’s name
  - Institution Address: Enter the address provided by the Program

Pending or Expired Registrations: Residents may not prescribe while their DEA registration is pending. Prescriptions must be written by the attending or an alternate provider on the team.

Residents training in Idaho, who do not have a full Idaho state physician license, will not be issued an individual DEA registration and must use the institution DEA number. The institution must provide each resident with an individual "suffix" number to use with the institution registration number.

Registration Updates: Incoming residents who currently hold a DEA registration issued outside Washington State must submit a DEA Registration Update Request once a Washington state provider license is issued.

Renewal Applications: An initial renewal notification will be sent by the DEA to the Resident by mail, with subsequent notifications sent via email to the address associated
with the DEA registration. Renewal applications are completed through the DEA Online Application System (DEA Form 224a). DEA registrations may be renewed on a fee-exempt basis as long as the Resident will only be using the registration within the scope of the training program.

Registration renewals must be submitted within 30 days of the expiration date. Failure to renew within the 30-day grace period will result in the registration being purged from the DEA databank, and a new application will be required.

**Change in Status or Program Completion:** It is the responsibility of the individual Resident to notify the DEA of any changes in status such as name changes, change in address after completion of the training program, and/or departure from the University, by submitting the online DEA Registration Changes form. Residents with a fee-exempt registration may not use their registration outside the training program and will need to apply for a new registration when departing a UW training program.

**Compliance:** DEA registrations will be recorded and tracked in MedHub once a copy has been received by the GME Office. This includes initial registrations, registration changes and renewals. Residents with a paid DEA registration who receive their initial and/or renewal registration directly from the DEA must submit a copy to the GME Office.

Residents who fail to renew their DEA registration by the expiration day will be restricted from prescribing while their renewal is pending.