Guidelines for the use of DEA Registration number by House Staff

This document seeks to provide answers to a number of questions that have arisen within New York University School of Medicine/NYU Hospitals Center (together, “NYU”) with respect to the correct usage of DEA Registration Numbers. It intends neither to replace nor to supersede relevant Federal and State regulations.

Covered individuals are encouraged to refer to the appropriate Federal Drug Enforcement Administration (“DEA”) and New York State regulations or to contact the NYU Office of Graduate Medical Education if additional questions arise; accordingly, some relevant Web links are provided at the end of Section V of this document.

General Information

Q1. **To whom does this guidance document apply?**
A1. This document applies to NYU Interns, Residents, and Foreign National Physicians enrolled in ACGME and non-ACGME specialty and subspecialty programs and Visiting Residents enrolled in ACGME-accredited specialty and subspecialty training programs (together, “Prescribers”). An “Intern” is a trainee in the first year of residency training; a “Foreign National Physician” is a physician who has been granted a visa to train in the United States; a “Visiting Resident” is an individual who is enrolled in a non-NYU residency training program who either is taking an In-Elective or is assigned to a Standing Rotation at NYU.

Q2. **To which institutions does this guidance document apply?**
A2. This document applies to Tisch Hospital, the Hospital for Joint Diseases and the Rusk Institute (together, “NYU Langone Medical Center”), Bellevue Hospital, Manhattan Ear, Eye and Throat Hospital (MEETH), and Lenox Hill Hospital (all together, “participating NYU System Hospitals”).

Q3. **What is a DEA Registration Number?**
A3. There are two types of DEA Registration Numbers:

1. **An Institutional DEA Registration Number** is a unique number issued by the Federal Drug Enforcement Administration (“DEA”) to a licensed, eligible institution that handles controlled substances.

2. **A Personal Federal DEA Registration Number** is a unique number issued by the DEA to a licensed, eligible Prescriber who applies for the right to dispense, administer, or prescribe controlled substances (e.g., narcotics).

Q4. **Under what circumstances would a Prescriber need a DEA Registration Number?**
A4. A Prescriber would need a DEA Registration Number in order to legally dispense, administer, or prescribe controlled substances.
Institutional DEA Registration Numbers and Suffixes

Q5. What is an Institutional DEA Registration Number?
A5. An Institutional DEA Registration Number is a unique number issued by the DEA to a licensed, eligible institution that handles controlled substances. A participating NYU System Hospital Institutional DEA Registration Number, when combined with a unique Suffix assigned to a specific Prescriber, authorizes that Prescriber to administer, dispense, and prescribe controlled substances under the conditions described below.

Q6. Who may use an NYU System Hospital’s Institutional DEA Registration Number?
A6. The only individuals legally authorized to use a participating NYU System Hospital’s Institutional DEA Registration Number are Interns, Residents, Foreign National Physicians, and Visiting Residents (together, “Prescribers”) who do not have a personal Federal DEA Registration Number and who administer, dispense, or prescribe controlled substances:

- under authorization of the laws of New York State;
- within the scope of their core training program and in the usual course of professional practice at a participating NYU System Hospital;
- while engaged in authorized Moonlighting activity at the participating NYU System Hospital that has authorized the Prescriber to use its Institutional DEA Registration Number;
- while assigned to a Standing Rotation at the participating NYU System Hospital that has authorized the Prescriber to use its Institutional DEA Registration Number;
- while taking an In-Elective or In-Rotation at a participating NYU System Hospital.

Q7. Who may not legally use an Institutional DEA Registration Number?
A7. Under New York State regulations, a Prescriber may use an Institutional DEA Registration Number only if he or she does not have a personal Federal DEA Registration Number. Once a Prescriber has obtained a personal Federal DEA Registration Number, he or she is required to use that number and may not use, under any circumstance or for any reason, an Institutional DEA Registration Number.

In addition, any physician who is not covered under this guidance document (e.g., an attending) is required to use a personal Federal DEA Registration Number when administering, dispensing, or prescribing controlled substances. Such physician is prohibited by law from using, under any circumstance or for any reason, an Institutional DEA Registration Number.

Q8. What is an Institutional DEA Registration Number Suffix?
A8. An Institutional DEA Registration Number Suffix is a unique code that is assigned to a Prescriber by the NYU Office of Graduate Medical Education when the Prescriber begins training at NYU. The Suffix is appended to the participating NYU System Hospital’s Institutional DEA Registration Number and authorizes the Prescriber to dispense, administer, or prescribe controlled substances under the participating NYU System Hospital’s DEA Registration Number, provided the Prescriber does not have a personal Federal DEA Registration Number.
Q9. How would a Prescriber obtain an Institutional DEA Registration Number Suffix?
A9. The NYU Office of Graduate Medical Education assigns a unique Suffix to each Prescriber prior to the commencement of his or her training at NYU. Prescribers who do not have a personal Federal DEA Registration Number are authorized to use the Suffix with the Institutional DEA Registration Number of each participating NYU System Hospital (i.e., Tisch Hospital, the Rusk Institute, Bellevue Hospital, the Hospital for Joint Diseases, and Lenox Hill Hospital). Prescribers who have a personal Federal DEA Registration Number may not use, under any circumstances, an Institutional DEA Registration Number and Suffix.

Q10. When is it illegal to use the Institutional DEA Registration Number of a participating NYU System Hospital?
A10. It is illegal to use the Institutional DEA Registration Number of a participating NYU System Hospital:
• when the Prescriber has a personal Federal DEA Registration Number;
• when the Prescriber writes a controlled substance prescription that will be filled at an outside pharmacy;
• when the Prescriber dispenses, administers, or prescribes controlled substances:
  — outside the scope of the residency program;
  — at any other hospital or institution (including during NYU-authorized Moonlighting activities, Out-Electives, and Standing Rotations).

Q11. How does NYU track a Prescriber’s Institutional DEA Registration Number Suffix?
A11. In compliance with DEA regulations, the NYU Office of Graduate Medical Education maintains a database of Prescribers and the Suffixes that it has assigned to them. The database is available at all times to the pharmacies within the participating NYU System Hospitals, to other registrants, and to law enforcement agencies, upon request, to verify the authority of the Prescriber.

Q12. When will the Prescriber’s Institutional DEA Registration Number Suffix expire?
A12. The Prescriber’s Institutional DEA Registration Number Suffix is valid for the duration of his or her NYU residency-training program, authorized NYU Moonlighting activity, and/or Visiting Resident’s In-Elective or In-Rotation.

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Personal Federal DEA Registration Numbers

Q13. What is a personal Federal DEA Registration Number?
A13. A personal Federal DEA Registration Number is a unique number issued by the DEA to a licensed, eligible Prescriber who applies for the right to administer, dispense, or prescribe controlled substances. Once a Prescriber has a personal Federal DEA Registration Number, he or she may not use, under any circumstances, an Institutional DEA Registration Number.

Q14. How would a Prescriber obtain a personal Federal DEA Registration Number?
A14. Any Prescriber who holds a current New York State medical license is eligible to apply for a personal Federal DEA Registration Number. Forms and instructions are available from the DEA Web site, http://www.deadiversion.usdoj.gov/online_forms.htm. Once a Prescriber obtains a personal Federal DEA Registration Number, he or she may not use, under any circumstance or for any reason, an Institutional DEA Registration Number.

Q15. **May a Prescriber legally use an institutional prescription pad with his or her personal Federal DEA Registration Number?**

A15. A Prescriber who has a personal Federal DEA Registration Number may use an institutional pad when writing prescriptions for controlled substances for patients affiliated with the corresponding participating NYU System Hospital, provided the Prescriber writes his or her personal Federal DEA Registration Number on the pad.

Q16. **When will the Prescriber’s personal Federal DEA Registration Number expire?**

A16. A personal Federal DEA Registration Number is valid for three years from date of issue.

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**Information Applicable to the Use of Institutional and Personal Federal DEA Registration Numbers**

Q17. **May a Prescriber legally administer, dispense, or prescribe controlled substances if he or she is not authorized to use a DEA Registration Number?**

A17. No. Under no circumstances may a Prescriber administer, dispense, or prescribe controlled substances if he or she is not authorized to use and has not been assigned an Institutional Suffix or received a personal Federal DEA Registration Number.

Q18. **When is it illegal to use a DEA Registration Number?**

A18. It is illegal to use a DEA Registration Number when the Prescriber dispenses, administers, or prescribes controlled substances:

- in violation of Federal or New York State law;
- in excessive amounts to any patient, including writing an excessive number of prescriptions for addicting or potentially harmful controlled substances;
- for the Prescriber’s own use or for the use of the Prescriber’s immediate family;
- for peers, nursing or hospital medical staff, or friends without clear documentation of a physician-patient relationship in the medical record.

Q19. **What should a Prescriber do if he or she takes an Elective at, is assigned to Rotate to, or is authorized to Moonlight at a non-NYU Systems Hospital?**

A19. A Prescriber who is assigned or authorized to train at a non-NYU Systems Hospital should contact that institution’s Graduate Medical Education Office for DEA Registration Number policy and procedure applicable to that institution.

This guidance document pertains to the use of DEA Registration Numbers at participating NYU System Hospitals only.
Q20. May a Prescriber use a DEA Registration Number for any purpose other than dispensing, administering, or prescribing controlled substances?

A20. The DEA strongly opposes the use of an Institutional or personal Federal DEA Registration Number for any purpose other than to provide certification of DEA registration in transactions involving controlled substances. Use of a DEA Registration Number as an identification number is not appropriate and could lead to a weakening of the registration system.

Q21. What will happen if a Prescriber misuses a DEA Registration Number?

A21. It is the policy of NYU to comply with the law. Violation of Federal and/or State regulations will be treated as a violation of NYU policy. Prescribers and their Directors of Residency Training should refer to the NYU Evaluation, Corrective Action, and Disciplinary Policy for Residents for relevant disciplinary action policy and procedure.

Q22. What should a Prescriber do if he or she has additional questions?

A22. Prescribers who have questions about DEA Registration Number usage should refer to the relevant Federal and New York State regulations or contact the NYU Office of Graduate Medical Education. Some resources include:

- NYU Office of Graduate Medical Education, 212-263-5506.

Bellevue Waiver Forms

Residents and fellows working at Bellevue who apply for individual DEA numbers may obtain a fee waiver from Dr. Manheimer’s office by following the procedure below. Please be advised that you may only obtain this waiver if you are currently working at Bellevue. Paper forms for Dr. Manheimer’s signature are available in the Medical Director’s Office, MN 20 at Bellevue. These forms must have Bellevue Hospital Center’s Address and the specific Department address within Bellevue as that is where certificates get mailed. Please contact Ms. Ivy Natera Al-Lahabi at 212-562-4743 if you have any questions.

The process to obtain an Institutional DEA waiver is as follows:

The House Staff Officer should come to the Medical Director’s office at Bellevue to complete a DEA form. Dr. Manheimer must sign the waiver section. House Staff should retain a copy of the form and mail out the original to the DEA. The address must be Bellevue Hospital Center’s Address and the Department must be contained within Bellevue (462 First Avenue, along with the specific departmental location).
1. Bellevue will not provide reimbursement for DEA Licenses. You must submit the waiver form with your application.
2. Bellevue cannot sign waivers for locations other than Bellevue Hospital Center.

Please be aware that DEA waivers are only available for house staff while working at Bellevue. House Staff that will be completing their training programs will not eligible for a Bellevue waiver.