

## **DEA NUMBERS AND HOSPITAL BASED PAS**

Federal regulations covering mid-level practitioners do not require DEA registration for inpatient hospital medical orders provided that the mid-level practitioner is an authorized employee or agent of the hospital. However, DEA mid-level registration is required if, upon discharge from the hospital setting, the practitioner will be writing controlled substance prescriptions

21 C.F.R. § 1301.22

Code of Federal Regulations

Title 21. Food and Drugs

Chapter II. Drug Enforcement Administration, Department of Justice

Part 1301. Registration of Manufacturers, Distributors, and Dispensers of Controlled Substances Exceptions to Registration and Fees

§ 1301.22 Exemption of agents and employees; affiliated practitioners.

(a) The requirement of registration is waived for any agent or employee of a person who is registered to engage in any group of independent activities, if such agent or employee is acting in the usual course of his/her business or employment.

(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.

(c) 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:

(1) Such dispensing, administering or prescribing is done in the usual course of his/her professional practice;

(2) Such individual practitioner is authorized or permitted to do so by the jurisdiction in which he/she is practicing;

(3) The hospital or other institution by whom he/she is employed has verified that the individual practitioner is so permitted to dispense, administer, or prescribe drugs within the jurisdiction;

(4) Such individual practitioner is acting only within the scope of his/her employment in the hospital or institution;

(5) The hospital or other institution authorizes the individual practitioner to administer, dispense or prescribe under the hospital registration and designates a specific internal code number for each individual practitioner so authorized. The code number shall consist of numbers, letters, or a combination thereof and shall be a suffix to the institution's DEA registration number, preceded by a hyphen (e.g., APO123456-10 or APO123456-A12); and

(6) A current list of internal codes and the corresponding individual practitioners is kept by the hospital or other institution and is made available at all times to other registrants and law

enforcement agencies upon request for the purpose of verifying the authority of the prescribing individual practitioner.

21 C.F.R. § 1301.23

Code of Federal Regulations

Title 21. Food and Drugs

Chapter II. Drug Enforcement Administration, Department of Justice

Part 1301. Registration of Manufacturers, Distributors, and Dispensers of Controlled Substances

Exceptions to Registration and Fees

§ 1301.23 Exemption of certain military and other personnel.

(a) The requirement of registration is waived for any official of the U.S. Army, Navy, Marine Corps, Air Force, Coast Guard, Public Health Service, or Bureau of Prisons who is authorized to prescribe, dispense, or administer, but not to procure or purchase, controlled substances in the course of his/her official duties. Such officials shall follow procedures set forth in part 1306 of this chapter regarding prescriptions, but shall state the branch of service or agency (e.g., "U.S. Army" or "Public Health Service") and the service identification number of the issuing official in lieu of the registration number required on prescription forms. The service identification number for a Public Health Service employee is his/her Social Security identification number.

(b) The requirement of registration is waived for any official or agency of the U.S. Army, Navy, Marine Corps, Air Force, Coast Guard, or Public Health Service who or which is authorized to import or export controlled substances in the course of his/her official duties.

(c) If any official exempted by this section also engages as a private individual in any activity or group of activities for which registration is required, such official shall obtain a registration for

such private activities.

Here's a link to DEA's website to the section of the practitioners/pharmacist manual that deals with valid Rx requirements. It summarizes the the basic requirements for prescribing, administering, and dispensing controlled substances under the Controlled Substances Act (CSA), 21 USC 801-890, and the DEA regulations, Title 21, Code of Federal Regulations(CFR), Parts 1300 to 1316. It basically alludes to the fact that since inpatient orders are not prescriptions, no DEA r egistration number would be required: [http://www.deadiversion.usdoj.gov/pubs/manuals/pharm2/pharm\\_content.htm](http://www.deadiversion.usdoj.gov/pubs/manuals/pharm2/pharm_content.htm) "