Name of Policy: Use of hospital assigned DEA numbers

Policy Number: 3364-87-43

Approving Officer: Chief of Staff
Chief Medical Officer

Responsible Agent: Chief Medical Officer

Scope: All University of Toledo Campuses

Minor/technical revision of existing policy

Major revision of existing policy

X Reaffirmation of existing policy

A. Policy Statement:

The University of Toledo Medical Center's policy for the use of hospital assigned Drug Enforcement Administration (DEA) numbers for prescribing controlled substances is limited to authorized licensed independent practitioners (LIPs) and residents in residency training programs at UTMC. All other practitioners must have their own DEA number on file with the Medical Staff Office as part of the medical staff application process.

B. Purpose:

To avoid misuse of the hospital DEA number and to comply with DEA regulations.

C. Procedure:

a. Residents.

- i. Proper identification is required before a hospital assigned DEA number is issued.
- ii. Graduate Medical Education will assign and maintain the list of hospital assigned DEA numbers for residents. The hospital assigned DEA number will consist of UTMC's DEA registration number plus a four digit suffix that is unique to each resident. For residents, the four digit suffix is made up of 1 letter followed by three numbers.
- iii. A medical resident may prescribe controlled substances using this hospital assigned DEA number, provided that:
 - 1. Such prescribing is done in the usual course of professional practice
 - 2. The practitioner is authorized or permitted to do so by the State of Ohio and UTMC has verified that the resident is permitted to prescribe
 - 3. The resident (1) acts only within the scope of his/her University of Toledo employment at the hospital and (2) only uses the hospital assigned DEA number for UTMC patient care
- iv. Residency program staff will provide the following information on the DEA Registration Record:

- 1. The resident's full name (printed) and signature
- 2. Date the hospital assigned DEA number is issued
- 3. Hospital assigned DEA number
- 4. Expiration date for the use of the hospital assigned DEA number (this is the duration of the resident's residency program at UTMC)

b. Authorized LIPs.

- i. In event emergency coverage is needed, the Chief Medical Officer may permit a LIP to practice using a hospital assigned DEA number for a defined amount of time, not to exceed thirty days.
 - 1. The UTMC Medical Staff Office will provide the following information on the DEA Registration Record:
 - a. The LIP's full name (printed) and signature
 - b. Date the hospital assigned DEA number is issued
 - c. Hospital assigned DEA number
 - d. Expiration date for the use of the hospital assigned DEA number (this is a maximum of thirty days from the date assigned)
 - 2. The UTMC Medical Staff Office will assign and maintain the list of hospital assigned DEA numbers for authorized LIPs. The hospital assigned DEA number will consist of UTMC's DEA registration number plus a four digit suffix that is unique to each authorized LIP. For authorized LIPs, the suffix is made up of 4 numbers.
 - 3. An authorized LIP may prescribe controlled substances using this hospital assigned DEA number, provided that:
 - a. Such prescribing is done in the usual course of professional practice
 - b. The LIP is authorized or permitted to do so by the State of Ohio and the Medical Staff Office has verified that the LIP currently has a DEA registration and a transfer or application is in process to obtain an Ohio DEA registration
 - c. The LIP (1) acts only within the scope of his/her UTMC Medical Staff privileges and (2) only uses the hospital assigned DEA number for UTMC patient care

c. Reporting.

i. Graduate Medical Education and the UTMC Medical Staff Office will provide their lists of hospital assigned DEA numbers for resident ad authorized LIPs to the Pharmacy Department.

3364-87-43

Use of Hospital Assigned DEA Numbers

- ii. The current list of hospital assigned DEA numbers and the corresponding residents and authorized LIPs is available to other registrants, UTMC staff and law enforcement agencies upon request for the purpose of verifying the authority of the prescribing residents and authorized LIPs.
- iii. The Pharmacy Department will email the list of hospital assigned DEA numbers to the Ohio Board of Pharmacy at support@pharmacy.ohio.gov for addition to the OARRS database on an annual basis and when changes are made to the list. Note: The Ohio Board of Pharmacy will not accept line item changes and each submission must contain the complete file in Excel format.

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Approved by:		Policies Superseded by This Policy:
/s/	09/06/2023	
Puneet Sindhwani, M.D. Chief of Staff	Date	Review/Revision Date:
		08/01/2022 02/08/2023
/s/	09/06/2023	02/08/2023
Michael Ellis MD	Date	
Chief Medical Officer		Next review date: 02/08/2026
Review/Revision Completed by: Medical Executive Committee		
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