SCOPE: This policy and procedure applies to all HCA facilities, including any department of the hospital such as a provider-based emergency department. This policy and procedure applies to Interns, Residents, and Fellows enrolled in ACGME, AOA, CPME, or ADA (Medical, Osteopathic Medical, Podiatry, and Dental) accredited specialty and subspecialty graduate medical education programs operating at HCA facilities (whether sponsored by HCA or another entity in partnership with HCA) and Visiting Residents enrolled in ACGME, AOA, CPME, or ADA accredited specialty and subspecialty training programs (together, “Residents”).

PURPOSE: To provide guidance regarding Resident prescribing of controlled substances. Specifically, to address the correct use by Residents of a facility’s Institutional DEA Registration Number while the Resident is providing care in HCA facilities.

DEFINITIONS:

ACGME – Accreditation Council for Graduate Medical Education
ADA – American Dental Association
AOA – American Osteopathic Association
CFR - Code of Federal Regulations
CPME – Council on Podiatric Medical Education
CSA -- Controlled Substances Act
DEA – The U.S. Department of Justice Drug Enforcement Administration
EMR - Electronic Medical Record
GME – Graduate Medical Education

The term “Resident” as used in this policy includes Medical, Podiatry, and Dental Interns, Residents, and Fellows enrolled in

- ACGME, AOA, CPME, or ADA specialty and subspecialty programs operating at HCA facilities (whether sponsored by HCA or another entity in partnership with HCA);
- Fellowship training programs operating at HCA facilities (whether sponsored by HCA or another entity in partnership with HCA) that are not accredited by ACGME accreditation but are approved by HCA GME;
- Non-HCA ACGME, AOA, CPME, and ADA specialty and subspecialty training programs with residents who are either taking an elective or are assigned a require rotation at an HCA facility for which there is a Program Letter of Agreement and/or Educational Affiliation Agreement in place with the facility; and
- Non-HCA fellowship training programs that are not accredited by ACGME but are approved by HCA GME with residents who are either taking an elective and/or are assigned a required rotation at an HCA facility for which there is a Program Letter of Agreement or Educational Affiliation Agreement in place with the facility.
### Types of Residents
- **“Intern”** is a trainee in the first year of residency training.
- **“Resident”** is a trainee in any year of training in a primary specialty, including the intern year.
- **“Fellow”** is a trainee who has completed a residency and is pursuing additional training in a sub-specialty.
- **“Visiting Resident”** is a sub-group of the term “Resident” as defined above and includes Medical, Podiatry, and Dental Interns, Residents, and Fellows enrolled in:
  - Non-HCA ACGME, AOA, CPME, and ADA specialty and subspecialty training programs with residents who are either taking an elective or are assigned a required rotation at an HCA facility for which there is a Program Letter of Agreement and/or Educational Affiliation Agreement in place with the facility; and
  - Non-HCA fellowship training program that is not accredited by the ACGME but is approved by HCA GME with residents who are either taking an elective and/or are assigned a required rotation at an HCA facility for which there is a Program Letter of Agreement or Educational Affiliation Agreement in place with the facility.

### Types of DEA Registration Numbers:

1. **An Institutional DEA Registration Number** is a unique number issued by the U.S. Drug Enforcement Administration (“DEA”) to a licensed, eligible institution that handles controlled substances.
2. **A Personal 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). Once a Prescriber has a personal DEA Registration Number, he or she may not use, under any circumstances, an Institutional DEA Registration Number.

A “Prescriber” for this policy is anyone who is authorized to order the administration of a controlled substance for an ultimate user.

An **Institutional DEA Registration Number Suffix** or “Suffix” is a unique code that is assigned to a Prescriber when the Prescriber begins training at the facility. The Suffix is appended to the Hospital’s Institutional DEA Registration Number and authorizes the Prescriber to dispense, administer, or prescribe controlled substances under the Hospital’s Institutional DEA Registration Number, provided the Prescriber does not have a Personal DEA Registration Number.

**MedHub** is the enterprise-wide Resident Management Software maintained by the HCA GME Corporate Office to manage Resident demographics to include an assigned Suffix to be used for the duration of their residency training program with HCA-affiliated facilities.

### POLICY:

1. Residents who have not obtained a Personal DEA Registration Number but are authorized to practice and prescribe in the state based on their status as a trainee in a GME program are authorized to use an HCA facility’s Institutional DEA Registration Number with their individual
Suffix, within the scope of their training program and in the usual course and scope of professional practice at the HCA facility that has authorized the Prescriber to use its Institutional DEA Registration Number. This includes the use of the Institutional DEA Registration Number with their individual suffix for e-prescribing.

2. In California, only Residents who are employed by the institution where they are training may use the facility’s Institutional DEA with Suffix, and they may only write prescriptions for controlled substances that will be filled at a pharmacy maintained in the hospital that employs the resident.

3. The Resident is not authorized to use the Institutional DEA Registration Number of an HCA facility:
   a. Where the Resident has a Personal DEA Registration Number;
   b. Where the Resident dispenses, administers, or prescribes controlled substances:
      i. Outside the scope of the residency program; or
      ii. At any facility or institution other than the one to which the Institutional DEA Registration Number is assigned.

4. Residents are prohibited from using the Institutional DEA Registration Number with Suffix to prescribe controlled substances:
   a. In violation of Federal or State law;
   b. In excessive amounts to any patient, including writing an excessive number of prescriptions for addictive or potentially harmful controlled substances;
   c. For the Prescriber’s own use or for the use of the Prescriber’s immediate family; or
   d. For peers, nursing or other hospital staff, medical staff, or friends without the individual being duly registered as a patient, assigned to the resident, and for which the resident has fully documented in the patient’s record the care provided.

5. The HCA GME Corporate office will assign a numerical Suffix as part of the resident on-boarding process for all residents. This number will be transmitted from the HCA GME Corporate office to all facilities where that resident will rotate. All Suffixes except 0000-0099 are reserved and may only be assigned by the HCA GME corporate office. Prescribers who have a Personal DEA Registration Number may not use, under any circumstances, an Institutional DEA Registration Number and Suffix. The Prescriber’s Suffix is valid for the duration of his or her residency training program, and/or the Visiting Resident’s in-elective or in-rotation except that:
   a. The authority to use the Institutional DEA Registration Number with Suffix will cease immediately upon a Resident obtaining a Personal DEA Registration Number.
   b. The authority to use the Institutional DEA Registration Number with Suffix will cease immediately upon the earlier of the completion of training by the Resident (i.e., graduation), or when the Resident is otherwise no longer assigned to the hospital for training purposes.
6. In compliance with DEA regulations, the HCA facility will have access to a current database of the Suffixes assigned to Residents. MedHub will be used as this database. The database is available at all times to each facility’s pharmacy and is available upon request by authorized individuals and agencies, including the DEA and state agencies, to verify the authority of the Prescriber.

7. A Personal DEA Registration Number is only available and required upon acquiring a permanent medical license. Residents are not expected to obtain a permanent medical license and a Personal DEA Registration Number unless required by state law at a defined point during their training program.

8. All Residents as part of their training will receive education on the following topics via HealthStream:
   - Orientation to Usage of HCA Facility’s Institutional DEA Number with Suffix;
   - Overview of Controlled Substances Prescribing;
   - Diversion Control Practices; and
   - Addressing Opioid Over-usage in Patients.

9. All prescribing Residents, including those prescribing controlled substances, must comply with all HCA and Facility policies, procedures and guidelines. The Resident is responsible for ensuring that the prescription conforms to all requirements of the law.

10. A Resident’s ability to prescribe controlled substances and the level of attending supervision shall be defined for each program based on the program’s supervision policy and its policy and procedure for Resident progressive responsibility.

11. A Visiting Resident’s ability to prescribe controlled substances and the level of attending supervision shall be based on the policies and procedures of the Visiting Resident’s sponsoring GME program as accepted by the HCA facility in a Program Letter of Agreement.

12. If there is a misuse of the Institutional DEA Registration Number with Suffix by a Resident, it will be addressed as prescribed by law, HCA corporate and facility policy, and the Program disciplinary procedure, and may include loss of authority to use the Institutional DEA Registration Number with Suffix and further disciplinary action including termination.

13. A Resident who is assigned or authorized to train at a non-HCA Hospital should contact that institution’s GME Office for the DEA Registration Number policy and procedure applicable to that institution.

14. This guidance document pertains to the use of DEA Registration Numbers at HCA facilities only.
DEPARTMENT: Graduate Medical Education (GME)  POLICY DESCRIPTION: GME - Use of Institutional and Personal DEA Registration Numbers

PAGE: 5 of 6  REPLACES POLICY DATED:  
EFFECTIVE DATE: July 1, 2017  REFERENCE NUMBER: GME.001

APPROVED BY: Ethics and Compliance Policy Committee

PROCEDURE:

1. For all Residents, the HCA GME Corporate Office will be responsible for issuing a Suffix as part of the on-boarding process. The HCA GME Corporate office will work with IT&S to have the assigned suffix entered into the EMR databases. The resident will use this Suffix at all HCA facilities where they rotate. The HCA GME Corporate Office will transmit the assigned Suffix to each facility where a Resident rotates. Upon the Resident’s obtaining a Personal DEA Registration Number, the HCA GME Corporate Office will transmit to all hospitals where the resident rotates the Personal DEA Registration Number so the provider dictionary can be updated.

2. The HCA GME Corporate Office will oversee:
   a. A process for confirmation by the program director, before issuing a Suffix, that the Resident is in good standing, has been verified to be authorized to dispense, administer, and/or prescribe drugs in the pertinent jurisdiction, and is able to begin training;
   b. A process for confirmation for Visiting Residents that the appropriate agreement (Program Letter of Agreement or Visiting Resident Application) is in place and all required documentation has been received before issuing a Suffix; and
   c. Documentation that each Resident has completed assigned education via HealthStream on:
      i. Orientation to Usage of HCA Facility’s Institutional DEA Number with Suffix;
      ii. Overview of Controlled Substances Prescribing;
      iii. Diversion Control Practices; and

3. Facilities in California will assure there are policies and procedures in place to address:
   a. Non-employed Residents and the provision of controlled substances if medically-indicated for patients under the Residents’ care; and
   b. Employed residents and the provision of discharge prescriptions that will be filled outside the hospital complex.

4. At the time of assignment of a suffix, the Resident will be provided a document outlining the allowed usage of the Institutional DEA Registration Number with Suffix and including notice that upon receipt of a Personal DEA Registration Number, the Resident or Visiting Resident may no longer use the Institutional DEA Registration Number.

5. Each facility where Residents train will have a process to enter in the EMR and any prescribing software each Resident’s Personal DEA Registration Number or, for residents without a Personal DEA Registration Number, the Institutional DEA Registration Number with Suffix.

6. At such time as a Resident receives a Personal DEA Registration Number, the EMR and any prescribing software will be updated to list the Resident’s Personal DEA Registration Number.
7. The facility must maintain or have access to a log of all Suffixes issued which shall include the following:
   a. Full Name;
   b. Date of Birth;
   c. Training Program;
   d. Date Suffix issued;
   e. Date use of Suffix terminated; and
   f. Suffix issued.

8. Within 15 business days after a Resident’s training at the HCA facility concludes, and within one business day after a Resident is terminated for any other reason, the EMR’s Provider Dictionary will be updated to remove that individual’s access to HCA clinical systems associated with the residency training program, including the ability to order or prescribe controlled substances.

REFERENCES:

1. Controlled Substance Monitoring Policy, CSG.MM.001
2. Substance Use in the Workplace Policy, CSG.MM.002
3. HCA Medication Diversion Prevention Policy, CSG.MM.003
4. US Department of Justice, Drug Enforcement Administration, Diversion Control Division, Practitioner’s Manual Section II – General Requirements
5. US Department of Justice, Drug Enforcement Administration, Diversion Control Division, Practitioner’s Manual Section V – Valid Prescription Requirements
6. US Department of Justice, Drug Enforcement Administration, Diversion Control Division, Practitioner’s Manual Appendix B – Questions and Answers