

DEPARTMENT: Graduate Medical Education (GME)	POLICY DESCRIPTION: GME - Use of Institutional and Personal DEA Registration Numbers
PAGE: 1 of 6	REPLACES POLICY DATED: 7/1/17
EFFECTIVE DATE: June 1, 2022	REFERENCE NUMBER: GME.001
APPROVED BY: Ethics and Compliance Policy Committee	

<p>SCOPE: This policy applies to HCA Holdings, Inc. (the “Company”) and all of its Affiliates operating in the United States with an Institutional DEA Registration Number, currently limited to hospitals, departments of hospitals, and ambulatory surgery centers (“HCA Healthcare Affiliates”). Within the Scope of GME.001 are Interns, Residents, and Fellows enrolled in ACGME, CPME, or ADA (Medical, Podiatry, and Dental) accredited specialty and subspecialty graduate medical education programs operating at HCA Healthcare facilities (whether sponsored by the Company or another entity in partnership with HCA Healthcare) and Visiting Residents enrolled in ACGME, CPME, or ADA accredited specialty and subspecialty training programs (together, “Residents”).</p>
<p>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 Healthcare facilities.</p>
<p>POLICY:</p> <ol style="list-style-type: none"> 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 Healthcare 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 Healthcare 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. The Resident is not authorized to use the Institutional DEA Registration Number of an HCA Healthcare facility: <ol style="list-style-type: none"> a. Where the Resident has a Personal DEA Registration Number; b. Where the Resident dispenses, administers, or prescribes controlled substances: <ol style="list-style-type: none"> 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. 3. Residents are prohibited from using the Institutional DEA Registration Number with Suffix to prescribe controlled substances: <ol style="list-style-type: none"> 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. 4. Upon employment at an HCA Healthcare Affiliate, or upon authorization to be considered an agent of an HCA Healthcare Affiliate for purposes of controlled substances laws, a unique User ID (UID) will be assigned. For the purposes of this policy, the assigned Suffix for

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- Residents using the Institutional Practitioner DEA Registration Number shall be the Resident's HCA Healthcare 3-4 UID (a.k.a. "3-4 ID") in compliance with the Model Security Procedure: Unique User Identification.
5. 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 their 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 Healthcare 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 Healthcare 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 Healthcare 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

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sponsoring GME program as accepted by the HCA Healthcare 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 Healthcare 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 Healthcare 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 Healthcare facilities only.

PROCEDURE:

1. For all Residents, the HCA Healthcare GME Corporate Office will be responsible for issuing a Suffix as part of the on-boarding process. The HCA Healthcare GME Corporate office will work with personnel in the appropriate internal department(s) to have the assigned Suffix entered into the EMR databases. The resident will use this Suffix at all HCA Healthcare facilities where they rotate, up to those limitations set by internal policy or State law. The HCA Healthcare 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 Healthcare GME Corporate Office will transmit to all hospitals where the resident rotates the Personal DEA Registration Number, so the EMR database can be updated.
2. The HCA Healthcare 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 that State law permits the Resident to order, prescribe or dispense controlled substances using the Institutional DEA number and any limitations on use set by law;
 - c. A process for confirmation for Visiting Residents that the appropriate agreement (Program Letter of Agreement or Educational Affiliation Agreement) is in place and all required documentation has been received before issuing a Suffix; and
 - d. Documentation that each Resident has completed assigned education via HealthStream on:
 - i. Orientation to Usage of HCA Healthcare Facility's Institutional DEA Number with Suffix;
 - ii. Overview of Controlled Substances Prescribing;
 - iii. Diversion Control Practices; and
 - iv. Addressing Narcotic Over usage in Patients.

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3. 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 or notice of a change in law affecting the Resident's ability to use the Institution DEA Registration Number, the Resident or Visiting Resident may no longer use the Institutional DEA Registration Number.
4. Each facility where Residents train will have a process to record in the EMR and any prescribing software each Resident's Personal DEA Registration Number. For residents without a Personal DEA Registration Number, the Institutional DEA Registration Number with Suffix will be entered.
5. 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.
6. 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.
7. Within 15 business days after a Resident's training at the HCA Healthcare facility concludes, and within one business day after a Resident is terminated for any other reason, the EMR's database will be updated to remove that individual's access to HCA Healthcare clinical systems associated with the residency training program, including the ability to order or prescribe controlled substances.

DEFINITIONS:

ACGME – Accreditation Council for Graduate Medical Education
ADA – American Dental 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:

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- ACGME, CPME, or ADA specialty and subspecialty programs operating at HCA Healthcare facilities (whether sponsored by the Company or another entity in partnership with HCA Healthcare);
- Fellowship training programs operating at HCA Healthcare facilities (whether sponsored by the Company or another entity in partnership with HCA Healthcare) that are not accredited by ACGME accreditation but are approved by HCA Healthcare GME;
- Non-HCA Healthcare ACGME, 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 Healthcare facility for which there is a Program Letter of Agreement or Educational Affiliation Agreement in place with the facility; and
- Non-HCA Healthcare fellowship training programs that are not accredited by ACGME but are approved by HCA Healthcare GME with residents who are either taking an elective and/or are assigned a required rotation at an HCA Healthcare 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:
 - o Non-HCA Healthcare ACGME, 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 Healthcare facility for which there is a Program Letter of Agreement or Educational Affiliation Agreement in place with the facility; and
 - o Non-HCA Healthcare fellowship training program that is not accredited by the ACGME but is approved by HCA Healthcare GME with residents who are either taking an elective and/or are assigned a required rotation at an HCA Healthcare 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.

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Suffix: a unique code that is assigned to an individual Prescriber, who is an agent or employee of a hospital, and that, when acting in the normal course of business or employment, may administer, dispense, or prescribe controlled substances under the registration of the hospital or institution which is registered in lieu of being registered him/herself. For Authorized Individuals, the hospital or institution will assign a code number that shall be a suffix to the facility's Institutional DEA Registration number, preceded by a hyphen (e.g., APO123456-ABC1234).

MedHub is the enterprise-wide Resident Management Software maintained by the HCA Healthcare 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 Healthcare-affiliated facilities.

Electronic Security Access Form (eSAF): The application used by HCA Healthcare Affiliates to automate: (1) requests for system access, (2) approval workflow, and (3) notifications to system administrators to grant, modify, and/or remove system access. For the purposes of this policy, eSAF is used to generate a unique User ID (UID) that is assigned as the Suffix. The UID is known as the HCA Healthcare 3-4 User ID (a.k.a. "3-4 ID").

REFERENCES:

1. Controlled Substance Monitoring Policy, [COG.MM.001](#)
2. Pharmacy-Related Dependent Healthcare Professionals, [COG.MM.004](#)
3. DEA and State Controlled Substance Diversion and Loss Reporting, [COG.MM.006](#)
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
7. Model Security Procedure: Unique User Identification
8. [Atlas Connect: DEA Usage for GME](#)
9. [GME Institutional DEA State Chart](#)