

## Medical Education Policy: Drug Enforcement Administration (DEA)

Facility: CMC  
Origin Date: December 2019  
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Sponsor: GMEC

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**PURPOSE:** Prescribing controlled substances to alleviate pain, anxiety and mental health disorders is a responsibility and part of the educational course necessary in post graduate medical training. The regulation of prescribing practices is performed by federal and local agencies. The ability to prescribe is permitted only when the prescriber possesses a valid certificate with associated number provided by the Drug Enforcement Administration (DEA). The mechanism and rules for how this certificate is maintained is herein described.

### **SCOPE:**

This Policy applies to all Accreditation Council for Graduate Medical Education (ACGME), Council on Podiatric Medical Education (CPME), and Commission on Dental Accreditation (CODA) accredited post-graduate training programs sponsored by Carilion Medical Center (CMC).

### **DEFINITIONS:**

**DEA** refers to the Drug enforcement Administration. The mission of the DEA is to enforce the controlled substance laws and regulations of the United States. The agency provides unique identifying credentials that allow holders to prescribe controlled substances.

**Internal moonlighting** refers to work that is performed under the supervision of faculty, within a Carilion facility. The supervision may be direct, indirect or via oversight. The level of supervision must be clearly delineated in the moonlighting agreement developed by the program.

**Independent practice** is a form of moonlighting when the resident engages in the unsupervised, independent practice of medicine. The location of practice may be within a Carilion facility or at a non-Carilion facility. To perform independent practice, the resident must hold an independent license and a personal DEA certificate.

**Resident** refers to all interns, residents, and fellows participating in Carilion Medical Center accredited post-graduate medical education programs.

**PROCEDURE:**

1. Temporary, facility-specific, restricted DEA numbers are made available for residents holding a temporary license from the Commonwealth of Virginia and provide authorization to prescribe controlled substances only for patients treated in connection with residency duties at the hospital that issued the correlating DEA number.
2. When rotating at non-Carilion facilities, residents will be assigned a temporary, facility-specific DEA number for use during the rotation by that facility.
3. All temporary DEA and Controlled Substance numbers expire following their assignment and are eliminated from the list of authorized numbers and from registration with various law enforcement bodies. The DEA numbers assigned for temporary purposes may not be utilized for independent practice.
4. Residents who engage in internal moonlighting activities will continue to use their assigned temporary, facility-specific, DEA number while performing these activities
5. Residents who hold a permanent Virginia medical license and a personal DEA number associated with that license must use their personal DEA number while performing independent practice.

**Misuse of DEA Number**

Misuse of the hospital-assigned or personal DEA numbers includes, but is not limited to:

1. Using a hospital's specific DEA number to prescribe controlled substances to patients not followed within that hospital's system;
2. Prescribing for self, family members, friends, hospital staff or other persons except as patients of the training program
3. Prescribing excessive amounts of controlled substances to any patient, including the writing of an excessive number of prescriptions for an addicting or potentially harmful drug to a patient;
4. Any violations of the provisions of this policy.

Misuse of any DEA number will be reported directly to the DIO and Program Director and may result in disciplinary action up to and including dismissal from the training program.

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<b>Name</b>	<b>Title</b>	<b>Dept./Committee</b>	<b>Date</b>
Donald W. Kees, MD	DIO	GMEC	December 17, 2019
Donald W. Kees, MD	DIO	GMEC	April 21, 2020