DEA Registration Program

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Objectives

- What is a DEA Registration Number?
- How to Apply for a DEA Registration/Renewal
- DEA Change of Address
- Locum Tenens
- MN Nurse Practitioners
- Fee Exempt Status
- DATA Waived Practitioners
- DEA WEBSITE

Registration Requirements

- The DEA registration grants Practitioners (physician, dentist, veterinarian, etc.) and mid-level practitioners (nurse practitioner, physician assistant, optometrist) federal authority to handle controlled substances
  (Prescribe, administer, maintain/store, and dispense)
- Every person or entity that handles controlled substances must be registered with DEA or be EXEMPT by regulation from registration
  - Title 21, Code of Federal Regulations (CFR) 1301.22 Exemption of agents and employees; affiliated practitioners

Fee Exempt/Fee Paid Status

- Fee Paid - $551.00
- Fee Exempt
  - Exemption from payment of application fee is limited to federal, state or local government official or institution. The applicant's superior or agency officer must certify exempt status

FEE EXEMPT CFR 1301.21

- The physical location where the practitioner/mid-level practitioner practices is not a factor in determining one's eligibility for a fee-exemption.
- The primary qualifying point for fee exemption is detailed in 21 CFR 1301.21(a)(2):
  - "Any individual practitioner who is required to obtain an individual registration in order to carry out his or her duties as an official of an agency of the United States…of any State, or any political subdivision or agency thereof"

FEE EXEMPT CFR 1301.21

- KEY PHRASE:
  - "carrying out official duties"
  - Physical location not a factor in determining one's eligibility for a fee exemption
  - Practice location not relevant

Title 21 Code of Federal Regulations (CFR) 1301.21 (a)(2)

Registration Requirements

The issuance by DEA of an individual practitioner registration is based on the practitioner being authorized to dispense controlled substances by the STATE in which he/she practices

- Rules 2004: Clarification of Registration Requirements for Individual Practitioners (www.deadiversion.usdoj.gov)

Registration Requirements

- A separate DEA registration is required for each principal place of business or professional practice where controlled substances are **stored by a practitioner**
  - For example: if a practitioner has more than one office where he maintains controlled substances, the practitioner must obtain a separate DEA registration for each office.

Application for Registration

- DEA Form 224 - New Application for Registration
- $551.00
- Applicant may submit the form by hard copy or on-line, www.deadiversion.usdoj.gov
  - Hard copy vs. on-line application

    Mailed to:
    DEA HQ
    Attn. Registration/ODR
    8701 Morrissette Drive
    Springfield, VA 22152

Registration Renewals

- DEA Form 224a – Renewal Application for Registration
- $551.00
  - registrations must be renewed every three years
- "Renewal Reminder Letter" is sent out 65 days prior to the expiration date
- Hard copy DEA Form 224a are sent out approx. 50 days before registration expiration date (Only if renewal has not been completed on-line)
  - Renew online as early as 60 days before expiration date
- Hard copy vs. on-line application

Registration Renewals

- DEA informs the registrant in the "Renewal Reminder Letter" that once they are expired and have not submitted a renewal they can no longer handle controlled substances
- No "grace period"
- When no renewal has been received a Delinquency letter is sent 7 days after the expiration date

3 Notifications to Renew!

Registration Renewals

- If a Renewal is submitted and the expiration date has passed, the existing registration is automatically extended and continues in effect on a day to day basis until DEA approval
  - Title 21, Code of Federal Regulations (CFR), Section 1301.36(i)

Registration Renewals

- Log-in to Begin Renewal Process
  You will need the information from your current registration certificate
  - DEA Registration Number
  - Last Name
  - First Name (optional) Leave it Blank!
  - SSN
  - Tax ID
  - Expiration Date
  - State
  - Zip

Change of Business Address

- A practitioner who moves to a new physical location must request a Change of Address
- On-line, www.deadiversion.usdoj.gov
- If the change in address involves a change in state, the proper state issued license must be obtained prior to the approval of modification
- Changes effective immediately upon DEA approval

Locum Tenens

- DEA policy concerning Locum Tenens
  - A locum tenens practitioner, like any other practitioner, has several options for legally using controlled substances in multiple states:
    - Separate DEA registrations for each state
    - Change of Address from one state to another
    - Use Hospital DEA registration
      - (hospital may choose to extend the use of it's DEA registration)
        - Title 21, Code of Federal Regulations (CFR) 1301.22 Exemption of agents and employees; affiliated practitioners

Nurse Practitioners

- Minnesota Registered Nurse License
- Advanced Practice
  - Minnesota Board of Nursing – APRN Eligibility to Prescribe Controlled Substances Verification to DEA form
    - APRN's MUST have this requirement met before a DEA New Application for Registration or Address Change/Renewal (if applicant is coming from another state) can be approved

Drug Addiction Treatment Act of 2000 (DATA)

- Physicians who treat narcotic addition using buprenorphine drug products, schedule III controlled substances, in treatment of narcotic dependence
- Physicians receive individual authorization from the Center for Substance Abuse Treatment (CSAT)
  - CSAT – 1-866-287-2728
- DATA waived practitioners may treat 30 or 100 patients at one time
- DEA Registration
  FZ9090909
  XZ9090909

DEA Diversion Website

- www.deadiversion.usdoj.gov
  - Manuals/Code of Federal Regulations (CFR)
  - Duplicate certificate
  - Obtain receipt (*only renewals done on-line*)
  - DEA registration validation (*only to be used by a DEA registrant*)
  - How to obtain a refund
  - Verifying DEA registrations
    - NTIS Subscription – list of active DEA registrants (www.ntis.gov)

Questions?

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Payor Credentialing Panel – Hosted by Cathy Davis, CPCS

Are you new to the credentialing profession? Do you have questions on what health plan credentialing is? This session provides an overview of health plan credentialing and what is typically required by health plans. Representatives from different health plans will be on hand to answer questions about what is required.

What is Health Plan Credentialing?

- *Credentialing* is the system by which a health plan checks that its healthcare practitioners are properly qualified for participation.
  - Does the applicant meet the health plan's participation criteria?
  - Is all the required information included in the application?
  - Are there any professional concerns that require further review by the Credentialing Committee?

What Information is Typically Required?

- Basic practitioner data such as:
  - Full Name (name as it will appear on claim submissions)
  - SSN
  - Date of Birth
  - Gender
- Practice location information such as:
  - Primary and alternate practice locations for your group
  - Must include complete address
  - Must include the tax identification number (TIN) for each location
  - Start date at each practice location
  - Specialty practicing at each practice location

What Information is Typically Required? continued…

- Education information as it applies to applicant:
  - Medical or Professional school
  - Complete name and address of school
  - Start and end dates (month/year)
  - Internships, residencies, fellowships need to include program specialty for each
  - If still in residency or fellowship, need expected completion date (month/year)
- Name of supervising physician (NP, CNS, CNM, PA)

What Information is Typically Required? continued…

- Employment history for the most recent 5 years
  - Address
  - Start and end dates (month/year)
  - Explain all gaps greater than 3 months
  - Reason for leaving
- Hospital admitting privileges
  - Name of hospital(s) where applicant has admitting privileges
  - If hospital admitting privileges are pending, need to include information on how admissions will be handled until applicant obtains admitting privileges (e.g., name of other practitioner who will admit patients until privileges received)
  - If a physician does not have admitting privileges and has no plans on getting admitting privileges, must describe the process for continuity of care (e.g., utilizes hospitalists, refers to primary care physician, etc.)
- Board certification information
  - Name of certifying body
  - Specialty certified in
  - Date of certification, re-certification, and certification expiration

Humor Break

What Information is Typically Required? continued…

- Allied certification
  - Copy of certification
- State licenses
  - Current state licenses for all states of practice
  - Include state, license number and expiration date
  - Can be primary source verified so a copy is not typically needed (some plans may still require a copy)
- DEA
  - Required for each state of practice
  - Can be primary source verified so a copy is not typically needed (some plans may still require a copy)
  - Copy of address change and statement of who will prescribe until DEA registered in state of practice
- Prescriptive Authority (NP, CNS, CNM, PA)
  - Copy of Collaborative Agreement for Prescribing Authority
- Diagnostic/Therapeutic Certification (OD)

What Information is Typically Required? continued…

- Professional Liability Coverage
  - Copy of certificate of coverage
  - Specifies Professional Liability
  - Includes effective and expiration date
  - Limits of $1mil per occurrence/$3mil aggregate
- Disclosure Questions
  - Each question answered
  - Explanation of each "Yes" answer
  - Explanation must be detailed
- Attestation (Signed & Dated)
- Authorization & Release (Signed & Dated)
  - Health plan receiving the application must be specified as the authorized entity

Humor Break

What Information Supports the Handling of the Application?

- Credentialing Contact Information
  - Name
  - Phone
  - Fax
  - Address
  - This is key information when a health plan needs to obtain additional information in order to complete the processing of an application

What Information Supports the Handling of the Application? continued…

- All dates to include MONTH & YEAR
- Work history that is easy to review
- Current reference information in the application
- Complete addresses (education, hospital affiliations, employment history, etc.)
- Legible handwritten information
  - explanations for "Yes" answers to Disclosure Questions
  - any other handwritten information in the application

Questions/Discussion Time