

Quick Tips for the Dental Office



Drug Enforcement Administration (DEA) Registration

Registration

Dentists are required to register with the Drug Enforcement Administration (DEA) in order to be able to engage in any of the following:

- Prescribe controlled substances to be filled at a pharmacy
- Dispense controlled substance to take by patients later
- Administer controlled substances in an office or clinic setting, either orally or through injection

DEA registrations are valid for three years.

Note: DEA registration is not required to be able to write prescriptions for non-controlled substances, such as antibiotics.

Practitioners must obtain a separate registration for each place of business or professional practice where controlled substances are manufactured, distributed or dispensed. **There is a limited exception for practitioners who register at one location, but practice at others within the same state. Those practitioners are not required to register at any other location in the same state, if they only prescribe controlled substances.**

Practitioners are permitted to use their home address as the principal place of business or professional practice, however be aware that the location becomes a “controlled premises” and is subject to unannounced inspections and administrative warrants under existing DEA regulations.

Dentists who practice in more than one state will need to have a separate DEA registration for each state. You are not authorized to prescribe or dispense a controlled substance outside of the state in which you are registered. For example, a dentist licensed in both Pennsylvania and New Jersey can only use their registration number in the respective state. Dentists are prohibited from using a Pennsylvania registration to prescribe or dispense in New Jersey, and vice versa.

Some states may require that you also obtain a separate state-issued controlled substance number in addition to your license to practice; Pennsylvania does not require a separate registration.

The DEA advises that new registrations could take four to six weeks to process.

To register, visit the DEA website at: <https://www.deadiversion.usdoj.gov/index.html>. DEA registration FAQ's can be found here: https://www.deadiversion.usdoj.gov/faq/registration_faq.htm.

Renewal

The renewal date for your DEA registration is directly correlated to the date in which the registration was first issued.

DEA does not send renewal notices in the mail; all notifications of renewal will come electronically, beginning 60 days prior to the expiration date. Notifications will be sent to the associated email address, so it is important to ensure that the email address listed on the registration is correct and active.

If a renewal application was submitted in a timely manner prior to expiration, practitioners may continue operations beyond the expiration date until final action is taken on the application.

DEA will allow the reinstatement of an expired registration for one month after the expiration date. If the registration is not renewed within that month, an application for a new DEA registration is required.

Regardless of whether a registration is reinstated within the calendar month after expiration, federal law prohibits the handling of controlled substances or List 1 chemicals for any period of time under an expired registration.

The American Dental Association offers several resources for providers regarding registering for a DEA number and prescribing controlled substances at: https://success.ada.org/en/practice-management/guidelines-for-practice-success/gps-managing-regulatory/18_registering-with-the-dea.

Voluntary Surrender

PDA recommends that dentists consult with an attorney if asked to voluntarily surrender a DEA license.

Termination

DEA registrations automatically terminates upon death, or when the dentist ceases legal existence, discontinues business or professional practice, or surrenders the registration. For those reasons other than death, dentists should notify their local Special Agent in Charge of the Administration and appropriately dispose of any remaining controlled substances.