

Subject: DEA registration for OMDs

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Gentlemen – I put this paragraph together and had Ron Passmore and Caroline Juran review it. It can be shared widely. Let me know if there are any further questions.

“It has come to our attention that there has been some confusion about DEA registrations for OMDs. For many years we recommended that OMDs obtain a DEA registration for their activities with their EMS agencies that was separate from their registration for their primary place of work. That served to “insulate” the OMD in the case that something transpired with the EMS agency that led to a suspension or that DEA number so it would not affect their primary work, e.g. emergency department, DEA registration. It was also more accurate in that DEA numbers are location specific, so using a single DEA registration for multiple locations could have caused some problems. This was sound advice, but the situation changed with the passage of the Protecting Patient Access to Emergency Medications Act in 2017. One of the provisions of that act is that it allows EMS agencies and any designated locations to be the DEA registrant rather than the OMD. We encourage EMS medical directors to pursue this option when they are working with their agencies to develop their own medication/drug kit programs rather than obtaining an additional personal DEA registration. The Board of Pharmacy Controlled Substances Registration (CSR) application and DEA application for the EMS agency registration will still require a sponsoring physician and there will be identifying information required on the application such as the physician's personal DEA registration number, but the agency will be the registrant rather than the OMD. Obtaining a second personal DEA registration number for use on the CSR and DEA application is not required of the sponsoring physician.”

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