

The following is an update from the DEA regarding the necessity for some physicians to have more than one DEA number.

If a physician operates multiple dispensing clinics, that physician must obtain multiple DEA numbers, and each clinic must order the controlled substances under the DEA registration for that location. Concurrently, all records of controlled substances ordered, administered or dispensed under that DEA number must be stored at that location.

If a practitioner merely writes prescriptions at a second office, and no controlled substances (including samples) are stored, administered or dispensed, he/she would not be required to obtain a second registration for the second office.

Federal regulations (21 CFR 1301.12(a)) state "A separate registration is required for each principal place of business or professional practice at one general physical location where controlled substances are manufactured, distributed, imported, exported, or dispensed by a person."

There must be a licensed physician registered with DEA at any location where controlled substances are stored, administered or dispensed. If a "group" of physicians have multiple offices, one physician, who is registered with DEA at that location, may assume the responsibility for all controlled substances administered, dispensed and stored on the premises. Otherwise, each physician would have to maintain separate stocks of medication, separate records and inventories at each office.

All controlled substances records must be filed in a readily retrievable manner, separate from all other business documents. The records must be maintained for two years under Federal law (three years under Arizona law), and made available for inspection by DEA. A physician who orders controlled substances for administering or dispensing in the office is accountable for each substance received--to the same regard as a pharmacy or a distributor would be. Therefore, accountability records must be maintained for each controlled substance purchased or received, administered or dispensed at that location.

Regulations regarding required records are found in Title 21 of the Code of Federal Regulations (CFR), Part 1300 to end. The CFR and other informational material is available on the DEA Diversion website at www.deadiversion.usdoj.gov. If you have any questions, you may contact the DEA Phoenix Diversion Office at 602-664-5600 or the Tucson Diversion Office at 520-573-5500.

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