

Managing the Regulatory Environment

ADA's Guidelines for Practice Success™ (GPS™)

ADA Do's and Don'ts for Prescribing Controlled Substances

DO'S

- Determine whether any of the medications you do – or might – prescribe for patients require registration with the DEA.
 - If so, check the Drug Enforcement Administration's (DEA) Office of Diversion Control's (ODC) [website](#) to make sure you're fully informed about federal requirements for prescribing controlled substances.
 - If you don't already have a DEA registration number, submit the necessary information and fees to apply for one.
 - ✓ Information is available on the agency's drug registration [website](#).
 - If you already have a DEA registration number, make sure that it's current.
 - ✓ Also make sure your DEA registration is readily retrievable and available at any time for inspection by the DEA upon request.
 - ✓ Your DEA license does not have to be on display within the practice unless required by your state.

- Contact your state dental association or licensing authority to find out whether other regulations, such as using triplicate prescription forms or abiding by specific limits on prescribing schedules, are in place.
 - Always follow the more stringent rules in the event that there are discrepancies between the DEA's regulations and those in place in your state.
 - When writing prescriptions for controlled substances, know whether you or a member of your team are required to consult their state's prescription monitoring program (PMP) database.
 - ✓ The Centers for Disease Control and Prevention (CDC) has a Prescription Drug Monitoring Programs (PDMPs) website for healthcare providers: [Prescription Drug Monitoring Programs \(PDMPs\)](#).

- When writing prescriptions, always:
 - use tamper-resistant prescription blanks
 - keep prescription pads secure
 - make sure they're signed as needed
 - make sure the form has the doctor's name, address, phone number and state license and DEA numbers
 - write legibly
 - write out the actual amount prescribed both in numbers and in words; this can discourage any alteration of the scrip
 - use the doctor's actual signature
 - make sure the form contains complete information about the patient including:
 - ✓ the patient's name, address, phone number, gender, and date of birth
 - ✓ the date of the prescription
 - ✓ the name of the drug being prescribed including:
 - the drug's name, strength, dosage form being prescribed (i.e. pills, capsules, tablets, liquids)

- the quantity being prescribed
 - directions for use
 - the number of refills allowed, if any
- write all information alphabetically to discourage alterations of the scrip
- Be aware that only you can sign the prescription form.
 - This is true even in states where dentists are allowed to delegate writing prescriptions to a team member who has passed a screening process
 - When allowed by law, delegated team members can:
 - ✓ authorize prescription refills only providing the doctor has approved the refill and that the practice is in compliance with all appropriate federal and state laws as well as with the regulations for the various controlled substances
 - ✓ safeguard your practice, your patients, your team and yourself by establishing and maintaining a written authorization confirming that specific staff person(s) are approved to authorize refills per your approval to assist with this
- Refer to the Centers for Disease Control and Prevention's (CDC) resource on [Tamper-Resistant Prescription Form Requirements](#) for guidance regarding what should be on the prescription form.
- Consider whether e-prescribing is an option for your practice.
 - ✓ Refer to the [ADA Tip Sheet for e-Prescribing Controlled Substances](#) for more information.

DON'TS

- Never pre-sign prescription forms. For any reason.
- Never use signature stamps.

Resources:

DEA Office of Diversion Control's [website](#)
[Registration Information](#) from the ODC website
 CDC [Prescription Drug Monitoring Programs \(PDMPs\)](#)
 CDC [Tamper-Resistant Prescription Form Requirements](#) [PDF]
 ADA [Tip Sheet for e-Prescribing Controlled Substances](#) [PDF]

Reproduction of this material by dentists and their staff is permitted, provided that any reproduction must include the ADA copyright notice. Any other use, duplication or distribution by any other party requires the prior written approval of the American Dental Association. **This material is for general reference purposes only and does not constitute legal advice. Dentists should contact qualified legal counsel for legal advice, including advice pertaining to compliance with the regulation(s) discussed in the content of this resource.**

© 2017, 2022 American Dental Association. All Rights Reserved.