

## CONTROLLED SUBSTANCE EDUCATION REQUIREMENT FOR DEA REGISTRATION

### FREQUENTLY ASKED QUESTIONS

(Rev. 9/7/23)

[Sec. 1263](#) of the spending bill Congress passed in December 2022 requires controlled substance prescribers to complete 8 hours of one-time training on safe controlled substance prescribing as a condition of receiving or renewing a DEA registration. The statutory language was taken from a separate bill, titled the Medication Access and Training Expansion Act (or MATE Act).

Click [here](#) for the latest version of this document. You may need to refresh your browser.

#### \*\*\* GRANDFATHER CLAUSE \*\*\*

Before taking new courses, note that *past trainings can be used to satisfy requirement*. In other words, if you completed a [qualified training](#) prior to the enactment of this new training obligation on December 29, 2022—that training would count towards the eight-hour requirement.

DEA has confirmed there is no statute of limitations for past coursework to qualify. For example, a qualifying course taken 20 years ago would satisfy the requirement (with a certificate of completion).

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Rev. 4/10/23

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Institutional registrants?  
Course lasting less than one hour?  
Self-study activities?  
How will CERP providers know if their courses qualify?  
In-person only?

### 1. Does this new DEA training requirement affect me?

Likely. The requirement applies to all new and renewing DEA registrants (Schedules II, III, IV, and V). The only exceptions are veterinarians.

### 2. What am I required to do?

At the time of your next scheduled DEA registration submission (but not before June 27, 2023), registrants must:

- Have completed eight hours of [qualified training](#) on safe controlled substance prescribing, with certificates of completion.
- Check a box on their registration submission affirming they have completed the training.
- Retain copies of all certificates of completion.

This applies regardless of whether a registrant is completing their initial registration application or renewing their registration. It also applies to all drug schedules (Schedules II, III, IV, and V).

Some important items to note:

- Certificates of completion are required, but formal continuing education credit is not.
- Qualified [coursework completed before the law's passage](#) is eligible (with certificates of completion).
- Qualified [coursework completed in dental school](#) is eligible for those less than five years out of dental school.

### 3. How much time do I have to comply?

Compliance is required by the time of your next scheduled DEA registration submission—regardless of whether it is an initial registration or a renewal registration—but not before June 27, 2023. For example, if you renew on June 26, 2023, compliance is not required until your next renewal.

### 4. Does DEA plan to extend the compliance deadline(s)?

DEA is aware that prescribers and training providers may have difficulty complying with the new training requirement in the time Congress allowed. The agency is considering whether and how it can grant additional time within the scope of its statutory authority. Until a decision is announced, however, those subject to the requirement should be prepared to comply by the congressionally established timeline.

Note that compliance is not required until the time of your next scheduled DEA registration submission—but not before June 27, 2023.

## 5. Will I have to complete the eight hours of training on a cyclical basis?

No. Additional training is not required after the one-time, 8-hour requirement has been satisfied. [Sec. 1263](#) specifically states, “The Attorney General shall not require any qualified practitioner to complete the training...more than once.”

## 6. How will I know what courses will satisfy the requirement?

To qualify, the coursework must meet three criteria:

- The course must be an approved topic.
- The course must be conducted through an approved medium.
- The course must be delivered by a designated training provider.

First, the course must cover some aspect of the safe pharmacological management of dental pain and screening, brief intervention, and referral for appropriate treatment of patients with or at risk of developing opioid and other substance use disorders. The subject matter is broadly defined.

Second, the training may take the form of classroom situations, seminars at professional society meetings, electronic communications, or otherwise. The ADA is seeking clarification about whether reading a journal article for continuing education credit would count toward the requirement.

Finally, the course(s) must be delivered by a designated training provider. The ADA, the American Association of Oral and Maxillofacial Surgeons (AAOMS), and ADA CERP providers are designated training providers. Click [here](#) for the complete list.

Some important items to note:

- Certificates of completion are required, but formal continuing education credit is not.
- Qualified [coursework completed before the law's passage](#) is eligible (with certificates of completion).
- Qualified [coursework completed in dental school](#) is eligible for those less than five years out of dental school.

## 7. How will DEA enforce this requirement?

DEA has indicated it does not plan to audit or investigate prescribers based solely on compliance with this training requirement. However, the agency may check for certificates of completion when investigating a prescriber for some other infraction.

## 8. How do I demonstrate compliance?

Registrants will need to check a box on their DEA registration submission—regardless of whether it is an initial registration or a renewal registration—affirming they have completed the required training. Registrants should also retain copies of all certificates of completion.

Recent graduates should contact their dental school for completion certificates. Recent graduates may also need to complete supplemental training if their qualifying coursework total less than eight hours.

DEA currently has no plans to create a platform that will allow prescribers to upload and store certificates of completion.

## 9. Does the ADA offer eligible training on safe controlled substance prescribing?

Yes. Both the ADA and ADA CERP providers are among the [designated training organizations](#) that offer educational courses on the safe pharmacological management of dental pain and screening, brief intervention, and referral for appropriate treatment of patients with or at risk of developing opioid and other substance use disorders.

The DEA appears to be relying on the law's designated training organizations to make good faith determinations about what courses will satisfy the new training requirement.

The ADA is a designated training provider. For an up-to-date list of continuing education offerings, please visit the ADA website at <https://www.ada.org/resources/practice/wellness/opioid-education-for-dentists>.

### \*\*\* IMPORTANT \*\*\*

Before taking new courses, note that *past trainings can be used to satisfy requirement*. In other words, if you completed a [qualified training](#) prior to the enactment of this new training obligation on December 29, 2022—that training would count towards the eight-hour requirement.

DEA has confirmed there is no statute of limitations for past coursework to qualify. For example, a qualifying course taken 20 years ago would satisfy the requirement (with a certificate of completion).

Also note that relevant dental school coursework counts toward the federally required training for those who are less than five years out of dental school.

Again, the DEA appears to be relying on the law's designated training organizations to make good faith determinations about what courses will satisfy the new training requirement.

## 10. Do recent dental school graduates have to complete this additional training?

Likely. The requirement applies to all DEA registration submissions—regardless of whether it is an initial registration or a renewal registration—beginning on or after June 27, 2023. If you do not intend to apply for a DEA registration, you are not affected.

Note that the law permits relevant dental school coursework to count toward the training requirement for those who are less than five years out of dental school. DEA has stated it is relying on dental schools to hand out certificates documenting completion of any qualifying coursework.

## 11. Do the trainings have to be for continuing education credit?

No. Certificates of completion are required, but formal continuing education credit is not.

**12. I have multiple DEA registrations. Do I have to complete eight hours of training for each one?**

No. The same eight hours of training can be recycled for multiple DEA registrations.

**13. Do I have to use specific training providers? Will ADA CERP credits count?**

Yes. The course(s) must be provided only by the organizations listed in the statute. The recognized organizations are:

- American Dental Association
- American Association of Oral and Maxillofacial Surgeons
- ADA CERP-recognized providers (i.e., any organization recognized by the Commission for Continuing Education Provider Recognition, or CCEPR)

and/or

- American Society of Addiction Medicine
- American Academy of Addiction Psychiatry
- American Medical Association
- American Osteopathic Association
- American Psychiatric Association
- Any organization accredited by the Accreditation Council for Continuing Medical Education (ACCME)
- Any organization accredited by a state medical society accreditor that is recognized by the ACCME or the CCEPR
- Any organization accredited by the American Osteopathic Association to provide continuing education
- Any organization approved by the Assistant Secretary for Mental Health and Substance Use, the ACCME, or the CCEPR

If a state dental society is a recognized ADA CERP provider—or recognized by one of the other designated training providers—its courses should satisfy the requirement.

**14. Is my state dental society a recognized training provider?**

Possibly. If your state dental society is a recognized ADA CERP provider—or recognized by one of the other [designated training providers](#)—its qualifying courses should satisfy the requirement.

**15. Will training completed prior to the law's passage count toward the new requirement?**

Yes. Past trainings from designated training organizations can count towards a practitioner meeting this requirement. In other words, if you received an [eligible training](#) from one of the [designated training organizations](#)—prior to the enactment of this new requirement on December 29, 2022—that training counts towards the eight-hour requirement. A certificate of completion is required.

There is no statute of limitations on past trainings being used to satisfy the requirement, except for relevant [training in dental school](#). Dental school training may only be used by those who are less than five years out of dental school.

#### 16. Does the eight hours of training have to occur in one session?

No. The training does not have to occur in one session. It can be cumulative across multiple sessions that equal eight hours of training.

#### 17. Do courses have to be taken in one-hour blocks?

No. There are no minimum time restrictions on individual courses. However, certificates of completion must be obtained.

#### 18. Will training credits accepted for state licensure count toward the new DEA requirement?

Yes. Training hours accepted for state licensure may be recycled to satisfy the DEA training requirement. [Sec. 1263](#) specifically states, "Nothing in this subsection shall be construed...to preclude the use...of training...to satisfy registration requirements of a State or for some other lawful purpose."

#### 19. Can my state impose additional training requirements?

Yes. The federal requirement is a floor, not ceiling. Your state may impose additional training requirements. [Sec. 1263](#) specifically states, "Nothing in this subsection shall be construed...to preempt any additional requirements by a State related to the dispensing of controlled substances under schedule II, III, IV, or V."

#### 20. Am I required to complete training on controlled substance topics that are outside of my scope of practice?

No. Dental prescribers are not required to complete coursework on controlled substance prescribing topics that are outside their scope of practice (e.g., medication-assisted treatment).

#### 21. What is the ADA's position on this new requirement?

In 2018, the ADA became the only major health professional organization to [support mandatory continuing education](#) on the safe prescribing of controlled substances. As a result, lawmakers viewed the ADA as an honest broker on the subject and made several accommodations to address some early concerns.

Unlike the original version, lawmakers:

- Removed requirements for dentists to complete coursework on topics outside their scope of practice (e.g., prescribing buprenorphine).
- Allowed state-required training to count toward the new federal training requirement.

- Allowed dental school courses to count toward the federally required training for those less than five years out of dental school.
- Permitted training offered by ADA CERP training providers to count toward the federal training requirement.

## 22. Where can I find additional information?

Dentists and dental professionals may email the Member Service Center at [msc@ada.org](mailto:msc@ada.org), or call 312-440-2500. Staff are available 8:00 AM – 5:00 PM Central Time.

For official answers from the DEA, please email your questions to the Diversion Control Division Policy Section at [ODLP@dea.gov](mailto:ODLP@dea.gov), or call 571-362-3260. The website is [deadiversion.usdoj.gov](http://deadiversion.usdoj.gov).

Additional information is available on [ADA.org](http://ADA.org).