

GMDEC Reviewed: January 2010

GMDEC Approved: January 2010

Policy on LICENSURE EXEMPTION AND PRESCRIBING INFORMATION

Licensure Exemption

Under the State of Tennessee statute T.C.A. 63-6-207, medical interns, residents, and fellows who do not hold a special training license are exempt from the requirement of a license to practice medicine or surgery in this state when participating in an accredited training program in the state of Tennessee. The Graduate Medical Education office will apply to the Tennessee Medical Board for a licensure exemption for each resident or fellow while training under the supervision and control of University of Tennessee College of Medicine faculty. Residents and fellows are not permitted to practice medicine or surgery outside of their training program (moonlight) without being fully licensed to practice medicine or surgery in the state in which the moonlighting activity occurs.

Prescribing Information

• DEA and NPI Numbers

Since UT residents are exempted from the requirement of having an unrestricted Tennessee medical license, they cannot obtain individual DEA numbers that are required for prescribing controlled substances. However, they may dispense, administer and prescribe controlled substances under the registration of the individual teaching hospital in which the patient care is being provided. The GME Office will provide each resident with a specific internal code number (DEA Number suffix) to be used along with the appropriate hospital's institutional number. These internal codes are supplied to the pharmacies of our teaching partners and are available to law enforcement agencies upon request for the purpose of verifying the authority of the prescribing individual practitioner. Residents are provided the hospital institutional numbers and are responsible for using them appropriately. The institutional numbers are only valid for patients within that facility and cannot be used for any other purpose.

The DEA number should only be used on prescriptions for controlled substances. The NPI number must be included on all prescriptions including those requiring a DEA number. The National Provider Identifier (NPI) is a Health Insurance Portability and Accountability Act (HIPAA) Administrative Simplification Standard. The NPI is a unique identification number for covered health care providers. Covered health care providers and all health plans and health care clearinghouses must use the NPIs in the administrative and financial transactions adopted under HIPAA. The NPI is a 10-position, intelligence-free numeric identifier (10-digit number). This means that the numbers do not carry other information about healthcare providers, such as the state in which they live or their medical specialty. The NPI must be used in lieu of legacy provider identifiers in the HIPAA standards transactions.

All new residents must register for an NPI number at <https://nppes.cms.hhs.gov/NPPES/NPIRegistryHome.do>

Residents register under the designation "student" at this website.

As outlined in the Federal Regulation, The Health Insurance Portability and Accountability Act of 1996 (HIPAA), covered providers must also share their NPI with other providers, health plans, clearinghouses, and any entity that may need it for billing purposes.

The hospital institutional DEA numbers and individual suffixes can only be used for residency education rotations. Residents are responsible for immediately reporting any incidents that suggest compromise to the GME Office and/or hospital pharmacy. Misuse of an institutional DEA number could result in disciplinary action up to and including dismissal from the training program.

If moonlighting, a resident must obtain an individual federal DEA number (requires an unrestricted state medical license).

Approved by GMDEC January 14, 2009

Reviewed by GMDEC 1/14/10