Graduate Medical Education Committee  
Physician in Training Prescriptions & Chart Orders  
February 17, 2010

I. University of Colorado Hospital Policy

Policy/Procedures: 
Controlled Substances
A. All scheduled controlled substances are governed under this policy.
B. University of Colorado Hospital has delegated to the Director of Pharmacy, through the Office of the Chancellor, the authority to register the facility as a "hospital/clinic" and "researcher" with the Drug Enforcement Agency (DEA) and to procure controlled substances as defined by the DEA. The Director of Pharmacy has the authority to perform all other functions as are required under this registration.
1. The hospitals DEA registration may be used by fully licensed providers and those with physician in training licenses to prescribe controlled substances via chart order for inpatients at UCH
2. Providers with a Physician Training License and House Staff unique identifier number may utilize the hospitals DEA registration, when acting in the normal course of business/employment, to prescribe controlled substances in lieu of being registered him/herself, provided that the prescriptions are filled at UCH. The prescriptions shall only be written while under the supervision of a physician licensed to practice medicine pursuant to section 12-36-107 or 12-36-107.6 of the Colorado Revised Statues; a co-signature is not required. According to the bylaws of the Graduate Medical Education Committee, “any medication or treatment that is self-prescribed, prescribed by another housestaff officer, or prescribed for a member of your own family is prohibited while in a training program.”
3. Fully licensed providers are required to utilize their own DEA registration number for retail controlled substance prescriptions.

II. Supporting Regulations

A. TITLE 21-FOOD AND DRUGS

CHAPTER II--DRUG ENFORCEMENT ADMINISTRATION, DEPARTMENT OF JUSTICE

PART 1301_REGISTRATION OF MANUFACTURERS, DISTRIBUTORS, AND DISPENSERS OF CONTROLLED SUBSTANCES

Sec. 1301.22 Exemption of agents and employees; affiliated practitioners.
(a) The requirement of registration is waived for any agent or employee of a person who is registered to engage in any group of independent activities, if such agent or employee is acting in the usual course of his/her business or employment.

(b) An individual practitioner who is an agent or employee of another practitioner (other than a mid-level practitioner) registered to dispense controlled substances may, when acting in the normal course of business or employment, administer or dispense (other than by issuance of prescription) controlled substances if and to the extent that such individual practitioner is authorized or permitted to do so by the jurisdiction in which he or she practices, under the registration of the employer or principal practitioner in lieu of being registered him/herself.

(c) An individual practitioner who is an agent or employee of a hospital or other institution may, when acting in the normal course of business or employment, administer, dispense, or prescribe controlled substances under the registration of the hospital or other institution which is registered in lieu of being registered him/herself, provided that:

1. Such dispensing, administering or prescribing is done in the usual course of his/her professional practice;
2. Such individual practitioner is authorized or permitted to do so by the jurisdiction in which he/she is practicing;
3. The hospital or other institution by whom he/she is employed has verified that the individual practitioner is so permitted to dispense, administer, or prescribe drugs within the jurisdiction;
4. Such individual practitioner is acting only within the scope of his/her employment in the hospital or institution;
5. The hospital or other institution authorizes the individual practitioner to administer, dispense or prescribe under the hospital registration and designates a specific internal code number for each individual practitioner so authorized. The code number shall consist of numbers, letters, or a combination thereof and shall be a suffix to the institution's DEA registration number, preceded by a hyphen (e.g., APO123456-10 or APO123456-A12); and
6. A current list of internal codes and the corresponding individual practitioners is kept by the hospital or other institution and is made available at all times to other registrants and law enforcement agencies upon request for the purpose of verifying the authority of the prescribing individual practitioner.

B. Colorado Revised Statues 12-36-122 (a): “a physician training licensee shall be authorized to practice medicine only under the supervision of a physician licensed to practice medicine pursuant to section 12-36-107 or 12-36-107.6 and only as necessary for the physician training licensee’s participation in the approved internship, residency, or fellowship designated on the licensee’s application for a physician training license.”

C. Medical Board of Examiners Frequently Asked Questions: “Does the training permit or license allow me to write prescriptions? No, you may not write prescriptions which will be filled outside of your training institution. That is, prescription orders that
are given to a patient to be filled at a retail pharmacy must be co-signed by a fully licensed physician.”

III. Questions from the Denver Post

1. How does a resident write a prescription? Do they write their name/attending doctor’s name and use that doctor’s DEA number?

In the inpatient and clinic setting a provider with a physician in training license can write chart orders for all medications, including controlled substances, without an attendings co-signature. The chart order requires the attendings name. The hospitals DEA number is used in lieu of the providers.

In regards to retail prescriptions (for take home medications), if the Rx is filled at UCH an attending co-signature is not required. The hospitals DEA number along with the providers House Staff number is used.

2. Does the doctor whose DEA number is used have to be present or have to consult with the patient? Or can the resident just write a prescription using a doctor’s DEA number, log it and send the patient home?

Medical care provided by members of the House Staff occurs under the oversight of an attending physician. This physicians DEA number can only be used if the attending writes the Rx him/herself, co-signs the Rx, or allows the House Staff member to call in an Rx on his/her behalf (C11 excluded).

3. Does the medical school have any attending physicians who work with residents that do not have an active medical license or academic license in Colorado, meaning a physician with an inactive license and no DEA number?

Licensure and credentialing at UCH is under the purview of the Medical Staffing Office.
IV. UCH Physician in Training Retail Rx and Chart Order Documents

UNIVERSITY OF COLORADO HOSPITAL
Physician-in-Training Prescription Pad

This prescription is written by a physician-in-training and MUST be filled at a UCH pharmacy
unless co-signed by a licensed physician

Patient Name: _____________________________ Date: __________
Address: ________________________________
Medical Record #: _________________________ Allergies: ______________
Medication: _______________________________ Strength: ______________
Directions for Use: _________________________

Indication for use: _________________________ Refills: _________________
☐ Generic substitution permitted unless this box is checked
Prescriber Signature: ______________________ Co-signature: ____________
House Staff/UP#: __________________________ DEA/License#: __________
Contact#: ________________________________

This prescription shall only be used for the active treatment of UCH patients in a UCH facility.

Dispersing by non-proprietary name under formula system is permitted, unless checked here: ☐

☐ Verbal/Telephone Order received: Date: _____ / _____ Time: _____ By ______________ Title: __________________

Attending Physician:

Ordering Healthcare Provider: __________________________ GME/UP#: __________________________

Service: ____________________________ Pager: __________________________

Allergies: ____________________________

Do NOT use these abbreviations: OD, QOC, U, R, MS, MSG4, MgSO4, AD, AS, AU, OD, QS, OU
ALWAYS use a leading zero (correct = 0 X mg);
NEVER use a trailing zero (correct = X mg).

Physician Signature / Title / GME / UP #: __________________________

Transcribed by: __________________________ Title: __________________________ Date: ________ Time: ________

Verified by: __________________________ Title: __________________________ Date: ________ Time: ________

Date: _____ / _____ Time: ________

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