

December 9, 2016

Mr. Charles P. Rosenberg
Acting Administrator
U.S. Drug Enforcement Administration
8701 Morrisette Drive
Springfield, VA 22152

Dear Acting Administrator Rosenberg:

On behalf of the medical student and physician members of the American Medical Association (AMA), I am writing about the Drug Enforcement Administration's (DEA) recent web posting that announced a significant change to its registration renewal process for practitioners. The AMA is deeply concerned that many physicians are not aware of this change, which could have unintended adverse consequences for them and their patients.

Effective January 1, 2017, the DEA is eliminating the informal grace period which the agency had previously allowed for registrants to renew their registrations. Further, only one renewal notice will be sent to each registrant's "mail to" address approximately 65 days prior to the expiration date; no other reminders will be provided by DEA. The web notice indicated that online capability to renew a DEA registration after the expiration date will no longer be available, and that a failure to file a renewal application by 12 am EST of the expiration date will result in the "retirement" of the registrant's DEA number. Any registrant who fails to meet the deadline will be required to apply for a new DEA registration and will receive a new DEA registration number.

This change will have significant implications for physician registrants who might overlook the single notification sent by the DEA and fail to renew in a timely manner. The new process will impose increased administrative burdens on physicians since they will need to submit entirely new registration applications and then wait for DEA to review the application and issue a new registration number. Under the current renewal process, as long as the physician's registration was in the renewal process, pharmacies could treat the registration as valid. The announced change in process will mean that the physician's registration will not appear on the information provided to pharmacies – and if that happens, patients will not be able to receive their medication, including an emergency 72-hour supply. Since registrations occur monthly, these problems will occur each month, and could create chaos at the pharmacy counter. Moreover, if the pharmacy does dispense a prescription for controlled substances written by a physician after the physician's DEA registration was automatically terminated, the prescription's validity will be questionable. This could in turn affect the pharmacy's report to the state's prescription drug monitoring program since the report could be rejected as incorrect.

Acting Administrator Rosenberg

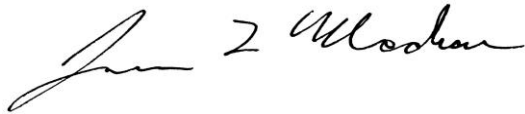
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We do not believe that a web posting is sufficient notice for the thousands of practitioners regarding this significant change in the DEA registration renewal process. The AMA urges the DEA to consider the unintended consequences that this change to renewal policy could cause, and recommends that the agency reverse the change to the renewal process and maintain the current grace period. Otherwise, the flow of physician practices, as well as patient care, will be adversely affected.

Thank you for your prompt attention to this matter. If you have any questions, please contact Margaret Garikes, Vice President of Federal Affairs, at margaret.garikes@ama-assn.org or 202-789-7409.

Sincerely,

A handwritten signature in cursive script, appearing to read "James L. Madara".

James L. Madara, MD

cc: Mr. Louis Milione