



**STATE OF  
OHIO**  
BOARD OF PHARMACY

## CRNA DEA Registration Guidance

**Updated 12/10/2020**

***For additional information regarding the implementation of HB 197 and CRNA scope of practice, the Board of Nursing published additional guidance in its quarterly magazine [Momentum](#) (see page 14).***

The Board of Pharmacy has been contacted by several hospitals around the state regarding the prescribing of controlled substances by Certified Registered Nurse Anesthetists (CRNAs) following the passage of [Ohio HB 197](#) (133<sup>rd</sup> General Assembly).

As a reminder, HB 197 added CRNAs to the definition of a "licensed health professional authorized to prescribe drugs" or "prescriber" in section 4729.01 of the Revised Code, to the extent authorized under sections 4723.43 and 4723.434 the Revised Code.

Pursuant to federal regulations, CRNAs that are employed by or serve as agents (e.g. contractor) of a hospital or other institutional facility are not required to obtain a mid-level registration from the Drug Enforcement Administration to order controlled substances and should utilize the institutional DEA registration of the facility where they are employed or contracted. Specifically, federal regulations authorize the following:

**[§1301.22 Exemption of agents and employees; affiliated practitioners.](#)**

...

*(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.*

**IMPORTANT:** In addition to federal regulations, the Board of Pharmacy has authorized this practice in OAC [4729:5-3-15](#). Furthermore, the Board of Pharmacy will begin the process of updating its rules to reflect the changes to Ohio law regarding CRNAs.

**NOTE:** The Board is working with DEA to clarify whether CRNAs may obtain a mid-level DEA registration. CRNAs ordering controlled substances should utilize the hospital or institutional facility's DEA registration until further guidance is issued by DEA.