

Title: Graduate Medical Education - License Policy

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I. Policy Statement

- a. The purpose of this policy is to establish processes and expectations regarding the licensure process and ensure residents do not engage in clinical practice prior to receiving appropriate licensure and controlled substance registration.

II. Definitions

- a. **Resident** – Resident means an intern, resident, or fellow who is formally accepted, enrolled, and participating in an approved MUHC medical training program. (based on CMS Guidelines for Teaching Physicians, Interns, and Residents and ACGME Glossary of Terms)
- b. **Temporary Missouri License:** Missouri medical license authorizing an independent practitioner to treat patients while enrolled in a residency or fellowship training program at MUHC. These licenses expire June 30th of each year.
- c. **Permanent Missouri License:** Missouri medical license authorizing an independent practitioner to treat patients in Missouri. Permanent licenses expire January 31st of each year.
- d. **BNDD License:** Missouri registration authorizing an independent practitioner to prescribe controlled substances and allow the application of a federal DEA registration.
- e. **DEA License:** Federal registration authorizing an independent practitioner to prescribe controlled substances.
- f. **Fee Exemptions for Controlled Substance Registration(s):** MUHC employed practitioners may apply for individual fee exempt DEA and BNDD registrations while performing clinical activities within the scope of their University employment and only while treating MUHC patients.
- g. **Controlled Substance Exemptions:** Pathology providers are not required to apply for these registrations due to the nature of their clinical practice.
- h. **Internal Transfer Residents:** Trainees matriculating to a new training program.
- i. **Promoting Residents:** Trainees advancing to the next PGY level.

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III. Process/Content

a. Temporary Missouri Licensure

- i. New Residents will be supplied with licensure application materials by the Office of Graduate Medical Education (GME) during onboarding. The resident and their training program coordinator must collaborate to submit a complete license application to the Office of Graduate Medical Education (GME) no later than 60 days prior to the resident's projected start date in order to begin the training program on schedule.
- ii. Promoting Residents will receive written notice of license renewal from the GME Office no later than 60 days prior to expiration.
- iii. Internal Transfer Residents switching specialties are required by the State Board of Healing Arts to apply for a new temporary license. Therefore, the resident and new training program coordinator must collaborate to submit a complete licensure application to the Office of Graduate Medical Education (GME) no later than 90 days prior to the resident's matriculation date in order to begin the new training program on schedule.

b. Permanent Missouri Licensure

- i. Permanent licensure is not required to treat MUHC patients while completing a training program. Therefore, anyone wishing to apply for permanent licensure MUST request permission from the GME Office before submitting such application.
- ii. Permanent license may be required for:
 1. Specialty board eligibility
 2. Approved moonlighting

c. Missouri Bureau of Narcotics and Dangerous Drugs (BNDD) Registration

- i. New residents will be supplied with BNDD application materials by the GME Office during onboarding. The training program coordinator must collaborate with the resident and submit a complete application online to the BNDD once the medical license has been issued.
- ii. Promoting and Internal Transfer Residents will receive written notice from the GME Office no later than 60 days prior to registration expiration that the registration will be renewed.
- iii. Residents approved by the GME Office to apply for permanent Missouri licensure should not apply for a new BNDD. Instead residents shall work with their coordinator and the GME Office to notify the BNDD that they

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now have a permanent Missouri medical license. Therefore, their BNDD number will remain the same.

d. **Drug Enforcement Administration (DEA) Registration**

- i. New Residents holding a temporary Missouri license will prescribe using the Institutional DEA Registration number plus their five-digit suffix assigned by the GME Office. The suffix is appended to the Hospital's Institutional DEA Registration and authorizes the prescriber to dispense, administer, or prescribe controlled substances.
- ii. Residents approved by the GME Office to complete the permanent Missouri licensure application shall collaborate with their coordinator and GME to apply for a Personal DEA Registration number after BNDD has moved their BNDD registration to a permanent registration.
- iii. Once a Prescriber has a personal DEA Registration number, they may not, under any circumstance, use the Institutional DEA Registration Number.

e. **Fee-Exempt Registrations**

- i. All waivers must be approved by the GME Office.
- ii. The administration and dispensing of controlled substances by MUHC practitioners at any other facilities, or for any non-MUHC patient, may not be permitted under the DEA regulations. Examples include treating or providing call coverage for VA patients, who are not MUHC patients.

f. **Missouri State Board of Healing Arts and Bureau of Narcotics and Dangerous Drugs**

- i. The GME Office must be notified of any Resident who receives a summons to appear before the Missouri State Board of Healing Arts or Bureau of Narcotics and Dangerous Drugs.
- ii. The GME Office must be notified of the outcome of all appearances before the Missouri State Board of Healing Arts or Bureau of Narcotics and Dangerous Drugs.
- iii. If at any time a resident is denied a medical license, BNDD certificate, or is placed on probation by the Missouri State Board of Healing Arts or Bureau of Narcotics and Dangerous Drugs, the GME Office will work with the Program Director to take the appropriate administrative action. Examples of appropriate administrative action might include enrollment in the Missouri Physicians Health Program (MPHP), probation, or termination depending on the situation.

IV. **Attachments**

- a. [Graduate Medical Education - Permanent License Request Application](#)

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V. References, Regulatory References, Related Documents, or Links

a. [Code of Federal Regulations](#)

21 CFR 1301.21(a)(1); CFR 1301.21(a)(2); 21 CFR 1301.21(c); 21 CFR 1301.22(c)