

Drug Enforcement Administration  
Diversion Control Division  
Guidance Document

**Title:** Required Training with Respect to Substance Use Disorders (SUD) for DEA-Registered Practitioners

**Summary:** This guidance document provides information regarding a Drug Enforcement Administration (DEA)-registered practitioner’s attestation of the training requirement in Section 1263 of the recently enacted Consolidated Appropriations Act of 2023 (CAA). This guidance will be sent via email to all DEA-registered pharmacies and practitioners and will be posted on the [DEA guidance portal](#).

**Activity:** Attestation of Training Requirement by DEA-Registered Practitioners

**To Whom It Applies:** All DEA-registered practitioners that are not solely veterinarians

**Background:** On December 29, 2022, President Biden signed into law the CAA,<sup>1</sup> one section of which created an education mandate for training in the identification and management of substance use disorders (SUDs) among practitioners, with the exception of those who are solely veterinarians, seeking to renew or newly apply for DEA registration to prescribe controlled medications.

Section 1263(a) of the CAA<sup>2</sup> added subsection (I) to [21 U.S.C. 823](#), which requires all “qualified practitioners” to complete required training with respect to substance use disorders as a condition of registration. Section 1263(a) defines the term “qualified practitioner” as a practitioner who (i) is licensed under State law to prescribe controlled substances, and (ii) is not solely a veterinarian.<sup>3</sup> This means that all DEA-registered practitioners who are not solely veterinarians must meet the training requirement. This includes, but is not limited to, DEA-registered physicians, mid-level practitioners, pharmacists registered as mid-level practitioners, naturopathic physicians, dentists, and optometrists.<sup>4</sup>

DEA-registered practitioners that are not solely veterinarians must, beginning with the “first applicable registration,” satisfy one of the applicable training requirements set forth in the CAA. The term “first applicable registration” means the first registration or renewal of registration by a qualified practitioner on or after June 27, 2023, under [21 U.S.C. 823\(I\)\(4\)\(A\)](#).

Section 1263(a) also amended the CSA to add [21 U.S.C. 823\(I\)\(2\)\(B\)](#), which requires DEA to provide to qualified practitioners “[n]ot later than 90 days after the date of enactment . . . a single written, electronic notification of the training described at [[21 U.S.C. 823\(I\)\(1\)\(A\)\(iv\)-\(v\)](#) and [\(1\)\(B\)\(i\)-\(ii\)](#)].” DEA has provided this electronic notification, which outlines how practitioners can satisfy the new training requirement; this [letter](#) is posted on DEA’s website.

**Question:** I am a DEA-registered practitioner. How do I attest that I completed the training

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1 Pub. L. No. 117-328, 136 Stat. 4459 (2022).

2 Pub. L. No. 117-328, div. FF, tit. I(B), ch. 6, § 1263(a), 136 Stat. 4459, 5683-5684 (amending the CSA to add standards for training), codified at [21 U.S.C. 823\(I\)\(1\)\(A\)-\(B\)](#).

3 Codified at 21 U.S.C. 823(I)(4)(B).

4 21 U.S.C. 802(21).

requirement for SUD required by the CAA?

**Answer:** As a condition of registration, the new training requirement in section 1263(a) of the CAA went into effect on June 27, 2023, and applies to all qualified practitioners when they apply for a new registration or a renewal of registration on or after that date. DEA-registered practitioners that are not solely veterinarians must, upon initial application or application for renewal of a registration (beginning on June 27, 2023), attest to meeting one of three standards for training set forth in the CAA<sup>5</sup>:

1. The applicant is a physician holding a board certification in addiction psychiatry or addiction medicine from the American Board of Medical Specialties, a board certification from the American Board of Addiction Medicine, or a board certification in addiction medicine from the American Osteopathic Association.
2. The applicant is a physician who graduated in good standing from an accredited school of allopathic medicine, osteopathic medicine, dental surgery, or dental medicine in the United States during the past 5 years and successfully completed a comprehensive allopathic or osteopathic medicine curriculum or accredited medical residency or dental surgery or dental medicine curriculum that included not less than 8 hours of training on treating and managing patients with opioid or other substance use disorders, including the appropriate clinical use of all medications approved by the FDA for treatment of substance use disorder or the safe pharmacological management of dental pain and screening, brief intervention, and referral for appropriate treatment of patients with or at risk of developing opioid and other substance use disorders.

Those applicants, other than a physician or a veterinarian, legally authorized by the State to dispense controlled medications under schedules II-V, may meet the training requirement when they have graduated in good standing from an accredited physician assistant school or accredited school of advanced practice nursing in the United States during the past 5 years, and successfully completed a comprehensive physician assistant or advanced practice nursing curriculum that included at least 8 hours of training on treating and managing patients with opioid or other substance use disorders, including the appropriate clinical use of all medications approved by the FDA for the treatment of substance use disorder.

3. The applicant is a physician who has completed at least 8 hours of training (inclusive or incremental) with respect to the treatment and management of patients with opioid or other substance use disorders or the safe pharmacological management of dental pain and screening, brief intervention, and referral for appropriate treatment of patients with or at risk of developing opioid and other substance use disorders by an entity listed in the CAA.<sup>6</sup>

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<sup>5</sup> Pub. L. No. 117-328, § 1263(a), 136 Stat. 4459, 5683-5684 (amending the CSA to add standards for training, codified at [21 U.S.C. 823\(j\)\(1\)\(A\)-\(B\)](#)).

<sup>6</sup> In accordance with the CAA, this training may be provided by the following entities: the American Society of Addiction Medicine, the American Academy of Addiction Psychiatry, the American Medical Association, the American

For those applicants who are non-physicians and legally authorized by the State to dispense controlled medications under schedules II-V, at least 8 hours of training must include training with respect to the treatment and management of patients with opioid or other substance use disorders delivered by an entity listed in the CAA.<sup>7</sup>

It should be noted that this is a one-time attestation and trainings can occur in classroom settings, seminars at professional society meetings, or virtual offerings.

DEA has modified the DEA Form 224 and DEA Form-224a applications for registration/renewal, in order for practitioners to attest to the training standards at their first applicable registration. The term “first applicable registration” means the first registration or renewal of registration by a qualified practitioner on or after June 27, 2023, under [21 U.S.C. 823\(l\)\(4\)\(A\)](#). The updated forms will be available from June 27, 2023, and include a section where a practitioner will attest to meeting the required training according to one of the standards identified above. It is recommended that each practitioner keep a record of training certificates or other materials documenting completion. However, these documents will not need to be submitted to DEA for review at the time of initial application or renewal of registration. After a practitioner attests to the completion of the CAA’s training requirement, if DEA approves the new or renewal application for registration, the new certificate of registration will be issued.

For information on how to satisfy the training requirement, please see the [letter](#) dated March 27, 2023, which DEA posted on its website. Practitioners can find additional information related to recommended training content on SAMHSA’s website at [Recommendations for Curricular Elements in Substance Use Disorders Training | SAMHSA](#).

The contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or Department of Justice policies.

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Osteopathic Association, the American Dental Association, the American Association of Oral and Maxillofacial Surgeons, the American Psychiatric Association, or any other organization accredited by the Accreditation Council for Continuing Medical Education (ACCME) or the Commission for Continuing Education Provider Recognition (CCEPR); any organization accredited by a State medical society accreditor that is recognized by the ACCME or the CCEPR; any organization accredited by the American Osteopathic Association to provide continuing medical education; or any organization approved by the Assistant Secretary for Mental Health and Substance Use, the ACCME, or the CCEPR.

<sup>7</sup>In accordance with the CAA, this training may be provided by the following entities: the American Society of Addiction Medicine, the American Academy of Addiction Psychiatry, the American Medical Association, the American Osteopathic Association, the American Nurses Credentialing Center, the American Psychiatric Association, the American Association of Nurse Practitioners, the American Academy of Physician Associates, or any other organization approved or accredited by the Assistant Secretary for Mental Health and Substance Use or the ACCME.