

The Controlled Substances Education Course Is Not Related To Your DEA Registration

by Bob Miller, PA; Professional Practice Committee Chair

The Controlled Substances Education Course (CSEC) does not affect your DEA registration. However, the CSEC is an important requirement in California if you want to eliminate advance approval for controlled substances and reduce cosignature requirements for Schedule II. The CSEC is NOT a DEA course. The course does not qualify nor disqualify you for DEA registration. You are qualified for DEA registration because you are delegated the authority to write for controlled substances by your collaborating physician. As of this writing, CAPA has organized over 45 of these educational events and will continue to offer them several times a year in the future. The PA Board (PAB) has determined the educational course is to be provided over a minimum of 6 hours and must be done in person with a proctored written examination. The course is for licensed PAs and is not available online.

There has been some confusion regarding the purpose of the course and the resulting benefit once the course and the exam have been successfully completed. This course does not affect your DEA registration and there is no need to notify them about completion of the CSEC. This course affects your

authority to write for controlled substances under California state law.

The purpose of the course is to give those individuals who complete it the option to modify the requirements for chart cosignature on an individual PA basis. The following clarifies why a PA should take the course and what to do following the course.

Advance Approval

Before the course was developed, EVERY PA was required to obtain patient-specific, advance approval from the physician before providing or issuing a drug order for any controlled substance (II-V). “Advance approval” means that the PA must obtain approval from the physician each and every time and prior to writing an order or writing a prescription for a controlled substance. “Patient-specific” means the physician approval must be for each particular individual patient. The approval does not need to be in writing and may be verbal. This is still current California law (B&P Code, Sec 3502.1), but an individual PA may modify the requirement by taking the CSEC.

Upon course completion, the delegating physician may give the PA the authority



The PA Board (PAB) has determined the educational course is to be provided over a minimum of 6 hours and must be done in person with a proctored written examination. The course is for licensed PAs and is not available online.



to write for some or all controlled substances without obtaining advance approval.

If you do not take the course, you must continue to obtain advance approval for all controlled substances in Schedules II – V.

Cosignature for Schedule II

In addition, passing the CSEC allows for a reduction in cosignature requirement for medical records involving Schedule II medications from 100% within 7 days to a minimum of 20%. If you have not passed the course, the cosignature requirement remains 100%. A cosignature is not needed on the prescription form itself. **CAPA**