

MATE Act Frequently Asked Questions

Does this new DEA training requirement affect me?

Likely. The requirement applies to all DEA registration submissions (Schedules II, III, IV, and V); regardless of whether it is an initial registration or a renewal registration beginning on or after June 27, 2023. The only exceptions are veterinarians and those who will not be obtaining or renewing a DEA registration.

What am I required to do?

At the time of your next scheduled DEA registration submission (but not before June 27, 2023), registrants must:

Complete eight hours of qualified training on safe controlled substance prescribing.

Check a box on your registration submission affirming that you have completed required training.

Retain copies of all certificates of completion.

This applies regardless of whether a registrant is completing their initial registration application or renewing their registration. It also applies to all drug schedules (Schedules II, III, IV, and V)

Those who are less than five years out of dental school should contact their school for certificates showing completion of any qualifying coursework. They may also need to complete additional training if their qualifying coursework totals less than eight hours.

How much time do I have to comply?

Compliance is required by the time of your next scheduled DEA registration submission; regardless of whether it is an initial registration or a renewal registration; but not before June 27, 2023. For example, if you renew on June 26, 2023, compliance is not required until the next renewal.

How will I know what courses will satisfy the requirement?

To qualify, the coursework must meet three criteria:

The course must be an approved topic.

The course must be conducted through an approved medium.

The course must be delivered by a designated training provider.

First, the course must cover some aspect of 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. The subject matter is broadly defined.

Second, the training may take the form of classroom situations, seminars at professional society meetings, electronic communications, or otherwise. The ADA is seeking clarification about whether reading a journal article for continuing education credit would count toward the requirement.

Finally, the course(s) must be delivered by a designated training provider. The GDA, ADA, the American Association of Oral and Maxillofacial Surgeons (AAOMS), and ADA CERP providers are designated training providers.

Some important items to note:

Certificates of completion are required, but formal continuing education credit is not.

Qualified coursework completed before the law's passage is eligible.

Qualified coursework completed in dental school is eligible for those less than five years out of dental school.

Will the GDA offer eligible training?

Yes. Please see the on-demand webinars mentioned above.

*** IMPORTANT ***

Before taking new courses, note that past trainings from recognized groups can be used to satisfy requirement. In other words, if you received a relevant training from one of the recognized groups prior to the enactment of this new training obligation on December 29, 2022; that training counts towards the eight-hour requirement.

DEA has confirmed there is no statute of limitations for past coursework to qualify.

Also note that relevant dental school coursework counts toward the federally required training for those who are less than five years out of dental school.

How will DEA enforce this requirement?

DEA has indicated it does not plan to audit or investigate prescribers based solely on compliance with this training requirement. However, the agency may check for certificates of completion when investigating a prescriber for some other infraction.

How do I demonstrate compliance?

Registrants will need to check a box on their DEA registration submission; regardless of whether it is an initial registration or a renewal registration; affirming they have completed the required training.

Prescribers should retain copies of all certificates of completion. Recent graduates should contact their dental school for completion certificates. Recent graduates will also need to take supplemental training if their qualifying dental school courses total less than eight hours.

DEA currently has no plans to create a platform that will allow prescribers to upload and store certificates of completion.

Will I have to complete the eight hours of training on a cyclical basis?

No. Additional training is not required after the one-time, 8-hour requirement has been satisfied. Sec. 1263 specifically states, The Attorney General shall not require any qualified practitioner to complete the training more than once.

Do recent dental school graduates have to complete this additional training?

Likely. The requirement applies to all DEA registration submissions regardless of whether it is an initial registration or a renewal registration beginning on or after June 27, 2023. If you do not intend to apply for a DEA registration, you are not affected.

Note that the law permits relevant dental school coursework to count toward the training requirement for those who are less than five years out of dental school. DEA has stated it is relying on dental schools to hand out certificates documenting completion of any qualifying coursework.

Do the trainings have to be for continuing education credit?

No. Certificates of completion are required, but formal continuing education credit is not.

I have multiple DEA registrations. Do I have to complete eight hours of training for each one?

No. The same eight hours of training can be recycled for multiple DEA registrations.

Do I have to use specific training providers? Will ADA CERP credits count? GDA Credits?

Yes - GDA is an ADA CERP provider and is therefore approved. The course(s) must be provided only by the organizations listed in the statute. The recognized organizations are:

American Dental Association

American Association of Oral and Maxillofacial Surgeons

ADA CERP-recognized providers (i.e., any organization recognized by the Commission for Continuing Education Provider Recognition, or CCEPR)

American Society of Addiction Medicine

American Academy of Addiction Psychiatry

American Medical Association

American Osteopathic Association

American Psychiatric Association

Any organization accredited by the Accreditation Council for Continuing Medical Education (ACCME)

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 education

Any organization approved by the Assistant Secretary for Mental Health and Substance Use, the ACCME, or the CCEPR

Will training completed prior to the law's passage count toward the new requirement?

Yes. Past trainings from designated training organizations can count towards a practitioner meeting this requirement. In other words, if you received a relevant training from one of the recognized groups prior to the enactment of this new training obligation on December 29, 2022 that training counts towards the eight-hour requirement.

DEA has confirmed there is no statute of limitations for past trainings to satisfy the requirement.

Additionally, relevant dental school coursework counts toward the federally required training for those who are less than five years out of dental school.

Certificates of completion are required.

Does the eight hours of training have to occur in one session?

No. The training does not have to occur in one session. It can be cumulative across multiple sessions that equal eight hours of training.

Will training credits accepted for state licensure count toward the new federal requirement?

Yes. Training hours accepted for state licensure may be recycled to satisfy the DEA training requirement. Sec. 1263 specifically states, Nothing in this subsection shall be construed to preclude the use to satisfy registration requirements of a State or for some other lawful purpose.

Can Georgia impose additional training requirements?

Yes, but they are not likely. The federal requirement is a floor, not ceiling. Your state may impose additional training requirements. Sec. 1263 specifically states, Nothing in this

subsection shall be construed to preempt any additional requirements by a State related to the dispensing of controlled substances under schedule II, III, IV, or V.

Am I required to complete training on controlled substance topics that are outside of my scope of practice?

No. Dental prescribers are not required to complete coursework on controlled substance prescribing topics that are outside their scope of practice (e.g., medication-assisted treatment). The ADA was successful in lobbying to remove this requirement from the original bill.

Where can I find additional information?

Please contact GDA Continuing Education Team at education@gadental.org or 404-636-7553.

You can also check out the DEA's web page [here](#). A useful video can be found [here](#).