

X-Waiver Eliminated: New Training Requirements

The DEA's X-Waiver (DATA-Waiver) program was eliminated by Congress in July 2022. On December 29, 2022, as part of the Omnibus Budget bill (Consolidated Appropriations Act of 2023), Congress enacted a new **one-time, 8-hour SUD training requirement** for **all** practitioners who need to renew or apply for a DEA registration. Below is a highlight of the changes, including links and resources for more information.

X-Waiver Elimination: What does this mean?

- X-Waiver (DATA-Waiver) registration is no longer needed to treat patients with buprenorphine for OUD.
- Prescriptions for buprenorphine will only need the standard DEA registration number.
- There are no patient limits or caps for a prescriber to treat OUD with buprenorphine.
- This does not change any state laws or regulations.

NEW SUD Training: What is required?

- Beginning on or after June 27, 2023 ([per March 27, 2023 DEA notice](#)), **all** prescribers of controlled substances and mid-level practitioners, except veterinarians, will need to have completed an **8-hour SUD training** at time of a new controlled substance DEA registration or at renewal.
- This new training requirement is to be completed **one-time** only.
- At renewal or when applying for a new DEA registration, practitioners will be affirming that they have met this new training requirement.
- DEA will not develop or offer the training.
- The training can be cumulative across multiple sessions that equal eight-hours of training and does not have to occur in one session.
- Training can be done through classroom situations, seminars at professional society meetings, electronic communication (live virtual/on-demand), or otherwise.
- For additional information please refer to the [DEA March 27, 2023 notice](#) that went to DEA registrants.

Practitioners: How can this requirement be met?

Pursuant to the [DEA March 27, 2023 notice](#) to registrants, the following groups of practitioners are deemed to have satisfied this training:

- Group 1: All practitioners that are board certified in addiction medicine or addiction psychiatry from the American Board of Medical Specialties, the American Board of Addiction Medicine, or the American Osteopathic Association.
- Group 2: All practitioners that graduated in good standing from a medical (allopathic or osteopathic), dental, physician assistant, or advanced practice nursing school in the United States within five years of June 27, 2023, and successfully completed a comprehensive 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 drugs approved by the Food and Drug Administration for the treatment of a substance use disorder; or
 - 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.

Other practitioners can meet this requirement by completing 8-hours of training on the treatment and management of patients with opioid or other substance use disorders from the following:

- If a practitioner has received relevant training on the treatment and management of patients with OUD or SUD from one of the groups listed below—prior to the enactment of this new obligation on December 29, 2023—that training counts toward the 8-hour requirement.
- Past X-Waived (DATA-Waived) training counts towards a DEA registrant's 8-hour SUD training requirement.

U-M Accredited Training Courses

U-M has training courses that are accredited and meet the new 8-hours of SUD training for practitioners needing to renew their DEA registration and for those applying for a new DEA registration:

- The Michigan Opioid Collaborative ([MOC](#)) has trained practitioners who were X-Waived (DATA-Waived) and those who have gone through the [MOC training already](#) satisfy the new 8-hour SUD training requirement. However, for practitioners wishing to refresh their knowledge and [who are needing to complete](#) the 8-hours of SUD training, MOC can provide the training with their expert trainers.
- The Opioid Prescribing Engagement Network ([OPEN](#)) is also offering accredited training that meets the new 8-hours of SUD training for practitioners and the OPEN team is ready to work with practitioners to complete their training requirement.

Important Notes

- State Regulations - The Bureau of Professional Licensing (BPL) within the Michigan Department of Licensing and Regulatory Affairs (LARA) oversees the licensing boards for health professionals. The BPL staff are currently talking with the relevant boards regarding this new DEA training requirement but are not looking to update the respective state regulations at this time. The Opioid Research Institute will continue to track and monitor if this changes.
 - Currently, BPL/LARA view this DEA change as a federal requirement and by state law, licensees who have a DEA registration and a state controlled substance license have to attest that they meet all state and federal requirements when renewing their health professional license and controlled substance license.
- DEA - For more information regarding the DEA training and registration requirements and a list of other accredited groups, visit the [DEA Drug Division site](#).