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DEPARTMENT OF HUMAN SERVICES



NEVADA DIVISION OF PUBLIC
and BEHAVIORAL HEALTH



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MEMORANDUM

DATE: March 2, 2026
TO: Nevada EMS Agency Directors
FROM: Nevada EMS Program, Division of Public and Behavioral Health
RE: DEA Final Rule on EMS Controlled Substance Registration – Effective March 9, 2026

Purpose

The Drug Enforcement Administration (DEA) published a final rule implementing the Protecting Patient Access to Emergency Medications Act of 2017, effective March 9, 2026[1]. The attached Federal Register document (2026-02288) establishes new requirements for EMS agencies handling controlled substances. This memo outlines critical changes and required actions.

What Changed

The DEA created a new registration category specifically for EMS agencies under 21 U.S.C. § 823(k)[2]. Nevada EMS agencies are already authorized under NRS Chapter 450B, satisfying federal eligibility requirements [3]. No Nevada state law changes are needed.

Key Requirements

- Registration: EMS agencies must obtain their own DEA registration (Form 224) OR hospital-based agencies may use hospital registration
- Single State Coverage: One registration covers all Nevada locations
- Fees: Government agencies (fire departments, county EMS) are fee-exempt; private/non-profit pay \$888 for 3 years, "Pursuant to the existing provisions of 21 CFR 1301.21(a)(1)"
- Stationhouses: Agencies may designate additional locations for controlled substance storage with 30-day advance notice to DEA via www.DEAdiversion.usdoj.gov
- Vehicle Storage: Controlled substances must be in locked, substantially constructed cabinets/safes that cannot be readily removed; vehicles must be locked when parked outside or unattended
- Jump Bags: Controlled substances may be carried during active emergency response only; must return to secure storage after each call
- Records: Document administration (patient info, drug, date/time, personnel initials/last name), disposal (witnessed), transfers, and biennial inventories; retain 2 years
- Hospital Restocking: Formalized with required documentation

Required Actions

Immediate (By March 31, 2026)

1. Assess registration status – Determine if operating under hospital, medical director, or existing agency registration
2. If assistance is needed Contact DEA Registration Service Center – 1-800-882-9539 or DEA.Registration.Help@dea.gov to discuss transition options
3. Verify security infrastructure – Confirm vehicles have compliant locked cabinets/safes; assess facility storage
4. Update protocols – Revise controlled substance handling, jump bag, and vehicle locking procedures

Short-Term (By June 1, 2026)

5. Complete DEA registration transition – Submit Form 224/224A
6. Designate stationhouses (if applicable) – Submit 30-day advance notice to DEA
7. Implement enhanced recordkeeping – Update EHR systems or paper logs for federal requirements
8. Train staff – Conduct training on storage, security, jump bag restrictions, and documentation; document completion

Compliance Verification

Nevada EMS permit inspections may verify:

- Valid DEA registration or hospital-based exemption documentation
- Designated location notifications
- Physical security (vehicle cabinets, facility storage, locking procedures)
- Recordkeeping completeness (administration logs, inventories, disposals, transfers)
- Staff training documentation

Contact Information

Nevada EMS Program

Phone: (775) 687-7590 | Email: healthems@health.nv.gov

Website: <https://www.dpbh.nv.gov/regulatory/emergency-medical-systems-ems/>

DEA Registration Support

Phone: 1-800-882-9539 (8:30 AM - 5:50 PM ET) | Email: DEA.Registration.Help@dea.gov

Portal: <https://deadiversion.usdoj.gov/drugreg/registration.html>

Attachment

Federal Register Vol. 91, No. 24 (February 5, 2026) – "Registering Emergency Medical Services Agencies Under the Protecting Patient Access to Emergency Medications Act of 2017" (DEA-377)

References

[1] Drug Enforcement Administration. (2026, February 5). Registering Emergency Medical Services Agencies Under the Protecting Patient Access to Emergency Medications Act of 2017. *Federal Register*, 91(24), 5216-5234. <https://www.federalregister.gov/documents/2026/02/05/2026-02288>

[2] Protecting Patient Access to Emergency Medications Act of 2017, Pub. L. No. 115-83, 131 Stat. 1267 (2017) (codified at 21 U.S.C. § 823(k)).

[3] Nevada Revised Statutes Chapter 450B (Emergency Medical Services); Nevada Administrative Code §§ 450B.461, 450B.475.

Additional Resources

Federal Resources:

- DEA Diversion Control Division: <https://www.deadiversion.usdoj.gov>
- DEA Registration Portal: <https://deadiversion.usdoj.gov/drugreg/registration.html>

Professional Association Guidance:

- National Association of EMS Physicians (NAEMSP): <https://naemsp.org>
- International Association of Fire Chiefs (IAFC): <https://www.iafc.org>
- American Ambulance Association: <https://ambulance.org>
- American College of Emergency Physicians (ACEP): <https://www.acep.org>