## Drug Enforcement Administration Diversion Control Division Guidance Document

Title: Enhanced Controlled Substance Ordering System (CSOS) Enrollment

**Summary:** The Drug Enforcement Administration (DEA) enhanced its CSOS system to ensure electronic ordering of schedule I-V controlled substances.

Activity: Enhanced CSOS Enrollment

To Whom It Applies: DEA registrants that use CSOS.

## Background

The present CSOS system is largely manual, relying heavily on a process that is inherently vulnerable to error as it requires scanning paper artifacts of different size and quality and human-driven data entry and validation that can negatively impact processing times for registration and renewal. As CSOS runs on legacy software, many of the technologies used to support the current CSOS system require significant updates and upgrades to maintain a stable and secure system.

The enhanced CSOS system will upgrade and improve the technology that both grants and manages CSOS registrations and certificates. It will also allow for the online submission of enrollment applications and certificate management (renewals and revocations) through a secure network application portal. As part of this enhanced process, identity verification will be processed and managed through Login.gov.

Dear DEA Registrants:

On **December 9, 2024**, DEA will launch an enhanced Controlled Substance Ordering System (CSOS) to ensure secure electronic ordering of Schedule I through V controlled substances. On February 2, 2023, DEA issued a Notice of Proposed Rulemaking (NPRM) regarding the modernization of CSOS. <u>88 FR</u>

7033. However, due to the technical issues noted above, DEA has concluded that launching the enhanced CSOS on December 9, 2024, prior to the publication of the final rule is essential. The enhanced CSOS program will upgrade and improve the technology permitting and managing registration and certificates. It will also allow for the online submission of enrollment applications as well as certificate management (renewals and revocations) through a secure network application portal. As part of this enhanced process, identity verification will be processed and managed through Login.gov.
Subsequently, DEA will stop accepting paper applications for CSOS enrollment after January 10, 2025. For those currently enrolled in CSOS there will be no changes unless they wish to make changes to their account. Additionally, for those registrants who do not use CSOS and continue to use paper form DEA 222 these changes will not impact their ability to order controlled substances.

**Current CSOS subscribers** who wish to make changes will need to create an enhanced CSOS account in the portal for the following tasks:

• Approvals - If you need to approve a new subscriber or certificate renewal.

• Revocations - If you are *revoking* a certificate.

• **Renewals** - If you are *renewing* a CSOS certificate. It is recommended to create a new account 45 days prior to the certificate expiration date.

Beginning December 9, 2024, **registrants electing to utilize CSOS for the first time** will need to create an account on the CSOS portal at <u>https://www.deaecom.gov/</u>. Registration will be handled through this account. Additionally, in furtherance of this enhancement, the DEA will no longer require new applicants to CSOS to comply with the provisions of <u>1311.20(b)(3)</u> since DEA will stop accepting paper applications for CSOS enrollment after January 10, 2025. Answers to common questions are

listed below:

Question: I currently use CSOS, will I need to resubmit information in the new online portal? Answer: Current and/or active registrants will not be required to resubmit information related to their current and/or active certificates.

Question: What device do I need to receive a verification code?

Answer: CSOS registrants have the option of receiving the verification code through OKTA verify, Google Authenticator, and email. OKTA has recently deprecated the phone option. As a result, cell phones or land phones are no longer an option.

Questions: How can I get technical assistance with CSOS?

Answer: DEA support staff are available for questions at 1-877-332-3266 or via email using the form at this link: <u>deaecom.gov/support/requestp1.aspx</u>. Self-help is available at <u>Controlled Substance Ordering</u> System Homepage, https://www.deaecom.gov.

Question: I don't currently use CSOS, am I now required to create an account to order controlled substances?

Answer: Enrollment in CSOS **is not mandatory**. *The CSOS enhancement will not impact registrants' ability to order controlled substances utilizing a paper DEA 222 Order Form*. In addition, there are no new regulatory requirements for registering for, or participating in CSOS, or for ordering controlled substances.

The implementation of the CSOS enhancement is a security decision by DEA. Participation in CSOS is and remains voluntary and this change will only affect users who opt to enroll a new CSOS account or who choose to update information in their existing accounts after the December 9, 2024, enhancement. Additionally, DEA will no longer require new applicants to CSOS to comply with the provisions of 1311.20(b)(3) since DEA will stop accepting paper applications for CSOS enrollment after January 10, 2025.

At this time there will be no new regulatory requirements on those who wish to update their existing accounts that will require them to do so until such time as DEA undertakes publication of a final rule on this matter. DEA will publish a final rule on this matter in the Federal Register, available at: <a href="https://www.federalregister.gov/">https://www.federalregister.gov/</a>. DEA support staff are available for questions at 1-877-332-3266 or via email using the form at this link: <a href="mailto:deaecom.gov/support/requestp1.aspx">deaecom.gov/support/requestp1.aspx</a>. Self-help is available at <a href="mailto:controlled Substance Ordering System Homepage">controlled Substance Ordering System Homepage</a>, <a href="https://www.deaecom.gov/">https://www.deaecom.gov</a>.

The guidance contained in this document does not have the force and effect of law and is 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 policies.

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