
Public Key Infrastructure Analysis

Diversion PKI CSOS Enrollment

Prepared for

**Drug Enforcement Administration
Office of Diversion Control
600 Army Navy Drive
Arlington, Virginia 22202**

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**Prepared by
PEC Solutions, Inc.**

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Section 1 — Introduction

The purpose of the CSOS Enrollment document is to record and confirm the resolutions agreed upon for the CSOS Enrollment process. The document is organized as follows:

Section 2 — Identifies the CSOS applicant categories and relationships.

Section 3 — Details the application forms used to apply for a CSOS Certificate.

Section 4 — Itemizes the documentation collected from each of the applicants for each of the enrollment processes

Section 5 — Provides detailed process flows and procedures for each of the enrollment processes.

Section 6 — Outlines the out-of-band procedures for submitting bulk enrollment applications by CSOS Coordinators.

Section 2 — Applicants

Exhibit 2–1 Applicant Overview diagrams the CSOS participants and their interrelationships. DEA issues a registration for the purpose of ordering controlled substances. The Registrant may grant Power of Attorney (POA) to one or more individuals within his/her organization thereby empowering them with the ability to obtain and sign controlled substance orders. The Registrant shall also fulfill the role or designate an individual(s) to fulfill the role of Principal Coordinator. The Principal Coordinator shall serve as an organization’s recognized CSOS contact to the CSOS RA with regards to CSOS Certificates and CSOS Certificate applications.

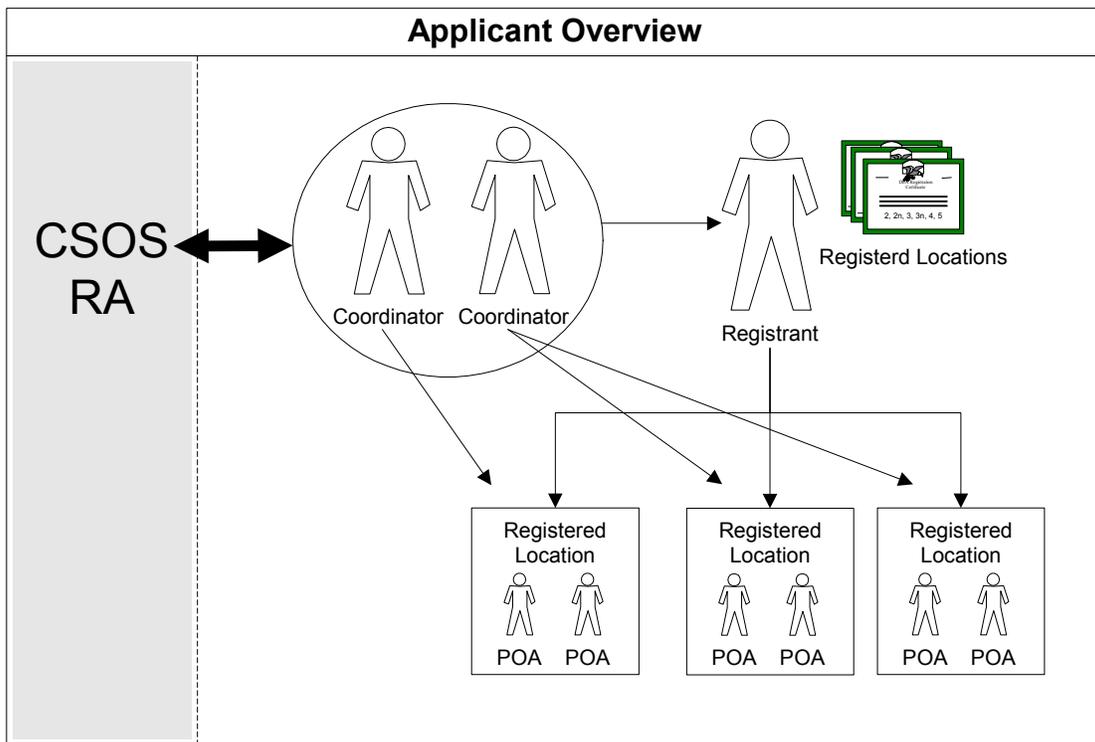


Exhibit 2–1 Applicant Overview

2.1 DEA Registrant

The CSOS DEA Registrant is defined as the individual who signed the most recent DEA Registration application or the individual authorized to sign the most recent DEA Registration application. Only the individual who signed the most recent application for DEA Registration or the individual authorized to sign the organization’s DEA Registration application may apply for a CSOS Certificate as a DEA Registrant.

Since the individual who signed the most recent DEA Registration application is often in a senior position within the organization and would not be involved in the order process, the DEA Registrant usually designates others to carry out this function by designating

individuals to be granted Power of Attorney to obtain and sign Schedule I and II controlled substance orders. Because many DEA Registrants may have multiple Powers of Attorney granted, a CSOS Coordinator, as defined in Sections 2.2 and 2.3 below, provides an important function through being a trusted and recognized individual administering CSOS Certificates and CSOS Certificate applicants.

2.2 Principal Coordinator

A Principal Coordinator shall be identified for each DEA Registrant participating in the Controlled Substance Ordering System. The Principal Coordinator shall serve as an organization's primary recognized CSOS contact for the DEA Registrant(s) identified on their application. The Principal Coordinator applicant may be any individual employed by the organization. If a CSOS DEA Registrant Certificate Application is submitted, the DEA Registrant shall serve the role of Principal Coordinator unless otherwise indicated on the application.

An approved Principal Coordinator shall serve as the primary Local Registration Authority (LRA) for the DEA Registrant(s) identified on their application. Serving in the role of LRA the Principal Coordinator shall be responsible for verifying the identity and authorization of organization personnel applying for a CSOS Certificate.

2.3 Alternate Coordinator

Optionally an organization may identify an Alternate Coordinator. Individuals acting as Alternate Coordinator shall serve as an organization's secondary recognized CSOS contact for the DEA Registrant(s) identified on their application. Alternate Coordinator applicants may be any individuals employed by the organization.

In the absence of the Principal Coordinator, the Alternate Coordinator shall serve as the LRA for the DEA Registrant(s) identified on their application. Serving as the LRA the Alternate Coordinator shall be responsible for verifying the identity and authorization of organization personnel applying for a CSOS Certificate.

2.4 Power of Attorney (POA)

POA applicants must hold a valid POA to obtain and sign Schedule I and II controlled substance orders for the DEA Registrant(s) identified on their application. Absent someone being granted POA to obtain and sign Schedule I and II controlled substance orders, only the person who sign most recent application for DEA Registration may apply for a CSOS Certificate.

Section 3 — Certificate Applications

There are three separate CSOS Certificate applications. Dependant upon the applicant classification, as described in Section 2, a CSOS applicant shall complete the appropriate CSOS Certificate application. The following subsections detail each of the applications: the CSOS DEA Registrant Certificate Application, the CSOS Principal Coordinator / Alternate Coordinator Certificate Application, and the CSOS Power of Attorney Certificate Application. The subsections are further divided to detail the information collected in each section of the applications. Subsection 3.4 details the CSOS Certificate Application Registrant List Addendum, which is used to submit additional DEA Registration numbers for which the applicant wishes to receive a CSOS Certificate.

3.1 CSOS DEA Registrant Certificate Application

Only the individual who signed the most recent application for DEA Registration (DEA Registrant) or the individual authorized to sign the most recent application for DEA Registration may obtain a CSOS DEA Registrant Certificate. Applicants will receive a CSOS DEA Registrant Certificate for the DEA Registrant(s) identified and will serve the role of Principal Coordinator unless otherwise indicated in the Applicant Information section of the application. Any other individual authorized to obtain and sign Schedule I and II controlled substance orders must obtain a Power of Attorney Certificate by submitting either a CSOS Principal Coordinator / Alternate Coordinator Certificate Application or a CSOS Power of Attorney Certificate Application. This form consists of three sections described below.

3.1.1 Applicant Information

Exhibit 3–1 Registrant Applicant Information Fields details the information collected in the Applicant Information section (Section 1) of the CSOS DEA Registrant Certificate Application.

Field	Description
Applicant First Name	Applicant's first name
Applicant Last Name	Applicant's last name/surname
MI	Applicant's middle initial
SSN	Applicant's social security number
Business Phone	Applicant's business phone number
Business E-mail	Applicant's business e-mail address
DEA Registration Number	DEA Registration number of location for which the applicant is applying.
DEA Registrant Name	The DEA Registrant name as it appears on the DEA Registration Certificate.
Security Code	Applicant supplied pass code e.g. Mother's maiden name to ensure proper identification when contacting the CSOS RA.
No. of Addendums	The number of CSOS Certificate Application Registrant List Addendums submitted with the application. Up to five (5).
Principal Coordinator	Name of the individual who will serve the role of Principal Coordinator. This should be the applicant's name if applicant will serve the role of Principal Coordinator.
Applicant Business Address	Applicant's business street address
City	City
State	State (2 letter abbreviation)
Zip Code	Zip code (Zip + 4)

Exhibit 3–1 Registrant Applicant Information Fields

3.1.2 Applicant Signature

The Applicant Signature section (Section 2) on the CSOS DEA Registrant Certificate Application provides a signature line for the applicant. The applicant must sign the application in the presence of a notary. By signing the application, the applicant attests to being the individual who signed the most recent application for DEA Registration or the individual authorized to sign the most recent DEA Registration application, and agrees to the rules and regulations contained in both the CSOS Subscriber Agreement and the DEA CSOS Registrant Agreement. In addition by signing the application, the applicant certifies that the information provide is true and correct to the best of his/her knowledge.

3.1.3 Notary Acknowledgement

The Notary Acknowledgement section (Section 3) on the CSOS DEA Registrant Certificate Application provides an area for a notary to identify the documents used to verify the applicants identity, stamp the application and sign the application, therefore acknowledging the signature of the applicant in Applicant Signature section (Section 2).

3.2 CSOS Principal Coordinator / Alternate Coordinator Certificate Application

CSOS Principal Coordinator / Alternate Coordinator Applications are submitted by individuals applying to serve the role of either Principal Coordinator or Alternate Coordinator. Principal Coordinator / Alternate Coordinator applicants will receive either a CSOS Administrative Certificate or a CSOS Power of Attorney Certificate dependant upon the applicant’s response to question 2 in the Applicant Classification section (Section 2) of the application.

3.2.1 Applicant Information

Exhibit 3–2 Coordinator Applicant Information Fields details the information collected in the Application Information section (Section 1) of the CSOS Principal Coordinator / Alternate Coordinator Application.

Field	Description
Applicant First Name	Applicant’s first name
Applicant Last Name	Applicant’s last name/surname
MI	Applicant’s middle initial
SSN	Applicant’s social security number
Business Phone	Applicant’s business phone number
Business E-mail	Applicant’s business e-mail address
DEA Registration Number	DEA Registration number of location for which the applicant is applying
DEA Registrant Name	The DEA Registrant name as it appears on the DEA Registration Certificate.
Security Code	Applicant supplied code e.g. Mother’s maiden name to ensure proper identification when contacting the RA.
No. of Addendums	The number of CSOS Certificate Application Registrant List Addendums submitted with the application. Up to five (5).
Principal Coordinator	Name of the individual who will serve the role of Principal Coordinator. This should be the applicant’s name if applicant will serve the role of Principal Coordinator.
Applicant Business Address	Applicant’s business street address
City	City
State	State (2 letter abbreviation)
Zip Code	Zip code (Zip +4)

Exhibit 3–2 Coordinator Applicant Information Fields

3.2.2 Applicant Classification

The questions in the Applicant Classification section are posed for the applicant to indicate if he/she is applying as a Principal or Alternate Coordinator and for the applicant to indicate if he/she is applying for a CSOS Power of Attorney Certificate.

3.2.3 DEA Registrant’s Affirmation of Coordinator Delegation

The individual who signed the most recent application for DEA Registration or the individual authorized to sign the most recent application for DEA Registration must affirm his/her delegation of the applicant to serve the role of Principal or Alternate Coordinator for the DEA Registrant(s) identified on the application. Exhibit 3–3 DEA Registrant Affirmation Fields details the information collected in the DEA Registrant’s Affirmation of Coordinator Delegation section (Section 3) of the CSOS Principal Coordinator / Alternate Coordinator Application.

Field	Description
Organization Name	The organization’s registered business name
Organization Address	Street address of the organization’s headquarters’ location
City	City
State	State (2 character representation)
Zip Code	Zip Code (Zip + 4)
DEA Registrant Signature	Signature of the individual who signed the most recent application for DEA Registration or individual authorized to sign the most recent application for DEA Registration
Name Last	Printed name of DEA Registrant who signed above.
Name First	Printed name of DEA Registrant who signed above

Exhibit 3–3 DEA Registrant Affirmation Fields

3.2.4 Applicant Signature

The Applicant Signature section (Section 4) on the CSOS Principal Coordinator / Alternate Coordinator Application provides a signature line for the applicant. The applicant must sign the application in the presence of a notary. By signing the application, the applicant agrees to abide by the rules and regulations contained in both the CSOS Subscriber Agreement and the DEA CSOS Registrant Agreement. In addition by signing the application, the applicant certifies that the information provided is true and correct to the best of his/her knowledge.

3.2.5 Notary Acknowledgement

The Notary Acknowledgement section (Section 5) on the CSOS Principal Coordinator / Alternate Coordinator Application provides an area for a notary to identify the documents used to verify the applicants identity, stamp the application and sign the application, therefore acknowledging the signature of the applicant in the Applicant Signature section (Section 4).

3.3 CSOS Power of Attorney Certificate Application

Individuals who hold a valid POA to obtain and sign Schedule I and/or II controlled substance orders submit CSOS Power of Attorney Certificate Applications. The Principal Coordinator or Alternate Coordinator performs the identity verification of POA applicants

for the DEA Registrant(s) identified. POA applicants will receive a CSOS POA Certificate.

3.3.1 Applicant Information

Exhibit 3–4 POA Applicant Information Fields details the information collected in Applicant Information section (Section 1) of the CSOS POA Certificate Application.

Field	Description
Applicant First Name	Applicant's first name
Applicant Last Name	Applicant's last name/surname
MI	Applicant's middle initial
SSN	Applicant's social security number
Business Phone	Applicant's business phone number
Business E-mail	Applicant's business e-mail address
DEA Registration Number	DEA Registration number of location for which the applicant is applying
DEA Registrant Name	The DEA Registrant name as it appears on the DEA Registration Certificate.
Security Code	Applicant supplied code e.g. Mother's maiden name to ensure proper identification when contacting the RA.
No. of Addendums	The number of CSOS Certificate Application Registrant List Addendums submitted with the application. Up to five (5).

Exhibit 3–4 POA Applicant Information Fields

3.3.2 Applicant Signature

The Applicant Signature section (Section 2) on the CSOS POA Certificate Application provides a signature line for the applicant. By signing the application, the applicant agrees to the rules and regulations contained in the CSOS Subscriber Agreement and certifies that the information provide is true and correct to the best of his/her knowledge.

3.3.3 Principal/Alternate Coordinator Affirmation of Applicant Identity Verification

The individual approved by the CSOS RA to serve the role of either Principal Coordinator or Alternate Coordinator for the DEA Registrant(s) identified must sign the CSOS POA Certificate Application. By signing the application, the Principal Coordinator or Alternate Coordinator is attesting to verifying the identity and authorization of the applicant in accordance with the DEA CSOS Registrant Agreement. Exhibit 3–5 Coordinator Affirmation Fields details the fields provided in the Coordinator Affirmation section (Section 3) of the CSOS POA Certificate Application.

Field	Description
Name Last (Print)	Printed name of DEA Registrant/Coordinator who signed above.
Name First (Print)	Printed name of DEA Registrant/Coordinator who signed above.

Exhibit 3–5 Coordinator Affirmation Fields

3.4 CSOS Certificate Application Registrant List Addendum

The CSOS Certificate Application Registrant List Addendum is an addendum used for individuals who wish to apply for a CSOS Certificate for more than one DEA Registrant. Up to 49 additional DEA Registration numbers may be submitted on the CSOS Certificate Application Registrant List Addendum. The CSOS Certificate Application Registrant List Addendum may be attached to any of the CSOS Certificate applications; the CSOS DEA Registrant Certificate Application, the CSOS Principal Coordinator / Alternate Coordinator Application or the CSOS POA Certificate Application.

3.4.1 Applicant Information

Exhibit 3–6 Registration List Addendum Applicant Information Fields details the information collected in Applicant Information section (Section 1) of CSOS Certificate Application Registration List Addendum.

Field	Description
Applicant First Name	Applicant’s first name
Applicant Last Name	Applicant’s last name/surname
MI	Applicant’s middle initial
SSN	Applicant’s social security number

Exhibit 3–6 CSOS Certificate Application Registrant List Addendum Applicant Information Fields

3.4.2 DEA Registrant(s)

Applicants shall enter any additional DEA Registration numbers for which they wish to receive CSOS Certificates in the DEA Registrants section (Section 2). Each line item contains a field for the DEA Registration Number and the DEA Registrant Name. The CSOS Certificate Application Registrant List Addendum may accommodate 10 DEA Registrants. Up to 49 DEA Registration numbers may be submitted through CSOS Certificate Application Registrant List Addendums.

3.4.3 Applicant Signature / Notary Acknowledgment

A signature line is provided in the Applicant Signature / Notary Acknowledgment section (Section 3) of the CSOS Certificate Application Registrant List Addendum for the applicant to confirm the DEA Registrant(s) identified. DEA Registrant and

Principal/Alternate Coordinator applicants must sign the addendum in the presence of a notary.

A signature line is also provided for either the notary or the CSOS Coordinator. The notary must sign each addendum attached to either a CSOS DEA Registrant Certificate Application or a CSOS Principal Coordinator / Alternate Coordinator Certificate Application. Either the Principal Coordinator or Alternate Coordinator must sign the addendums attached to a CSOS Power of Attorney Certificate Application.

Section 4 — Applicant Documentation Collected

Exhibit 4–1 Application Package Contents summarizes the documents that must be included in an application package submitted to the CSOS Registration Authority.

Application Package Contents	Applicant		
	DEA Registrant	Principal/Alternate Coordinator	Power of Attorney
Notarized Application	✓	✓	
Coordinator Signed Application			✓
Registrant List Addendum	✓*	✓*	✓*
Two Forms of Identification	✓	✓	✓
DEA Registration Cert. (223)	✓	✓	
Copy(s) of Power of Attorney		✓**	✓
*The Registrant List Addendum attachment is optional.			
** Principal/Alternate Coordinator Applicants who do not wish to sign orders for controlled substances are not required to attach a copy of their Power of Attorney.			

Exhibit 4–1 Application Package Contents

The following subsections detail the documents collected from each of the applicants, DEA Registrant, Principal/Alternate Coordinator and Power of Attorney.

4.1 DEA Registrant Applicant

The following bullets represent the items that must be included with a CSOS DEA Registrant Certificate Application:

1. The original completed, signed and notarized CSOS DEA Registrant Certificate Application.
2. If applying for more than one certificate, the CSOS Certificate Application Registrant List Addendum(s) signed by the applicant and a notary
3. Copies of two forms of identification one of which must be a Government-Issued Photo ID such as a driver’s license or passport.
4. Photocopy of the DEA Registration Certificate(s) (form 223) for the DEA Registrant(s) identified on the CSOS DEA Registrant Certificate Application and the CSOS Certificate Application Registrant List Addendum(s).

4.2 Principal Coordinator / Alternate Coordinator Applicants

The following bullets represent the items that must be included with a CSOS Principal Coordinator / Alternate Coordinator Application:

1. The original completed, signed and notarized CSOS Principal Coordinator / Alternate Coordinator Application signed by an the individual who signed the most recent application for DEA Registration (DEA Registrant) or the individual authorized to sign the most recent application for DEA Registration.
2. If applying for more than one certificate, the CSOS Certificate Application Registrant List Addendum(s) signed by the applicant and a notary.
3. Copies of two forms of identification one of which must be a Government-Issued Photo ID such as a driver's license or passport.
4. A photocopy of the DEA Registration Certificate(s) (form 223) for the DEA Registrant(s) identified on the CSOS Principal Coordinator / Alternate Coordinator Application and the CSOS Certificate Application Registrant List Addendum(s).
5. If the applicant is also applying for a CSOS Power of Attorney Certificate for signing Schedule I and/or II controlled substance orders – Photocopy(s) of the CSA Power of Attorney to obtain and sign controlled substance orders for the DEA Registrant(s) identified on the CSOS Principal Coordinator / Alternate Coordinator Application and CSOS Certificate Application Registrant List Addendum(s).

4.3 CSOS POA Certificate Applicants

The following bullets represent the items that must be with a CSOS Power of Attorney Certificate Application:

1. The original completed, signed CSOS Power of Attorney Certificate Application validated and signed by the Principal Coordinator or Alternate Coordinator of the DEA Registrant identified.
2. If applying for more than one certificate, the CSOS Certificate Application Registrant List Addendum(s) signed by the applicant and either the Principal Coordinator or Alternate Coordinator.
3. Copies of two forms of identification one of which must be a Government Issue Photo ID such as a driver's license or passport.
4. Photocopy(s) of the CSA Power(s) of Attorney to obtain and sign Schedule I and II controlled substance orders for the DEA Registrant(s) identified on the CSOS Power of Attorney Certificate Application and CSOS Certificate Application Registrant List Addendum(s).

Section 5 — Enrollment Processes

5.1 Enrollment Process Overview

Participation in the Controlled Substance Ordering System shall be initiated by the submission of either a CSOS DEA Registrant Certificate Application or a CSOS Principal Coordinator / Alternate Coordinator Application. After successful adjudication of either the DEA Registrant or the Principal Coordinator, CSOS Power of Attorney Certificate Applications may be submitted/processed. Exhibit 5-1 CSOS Enrollment Process Overview diagrams the steps taken by a DEA Registrant to enroll in CSOS.

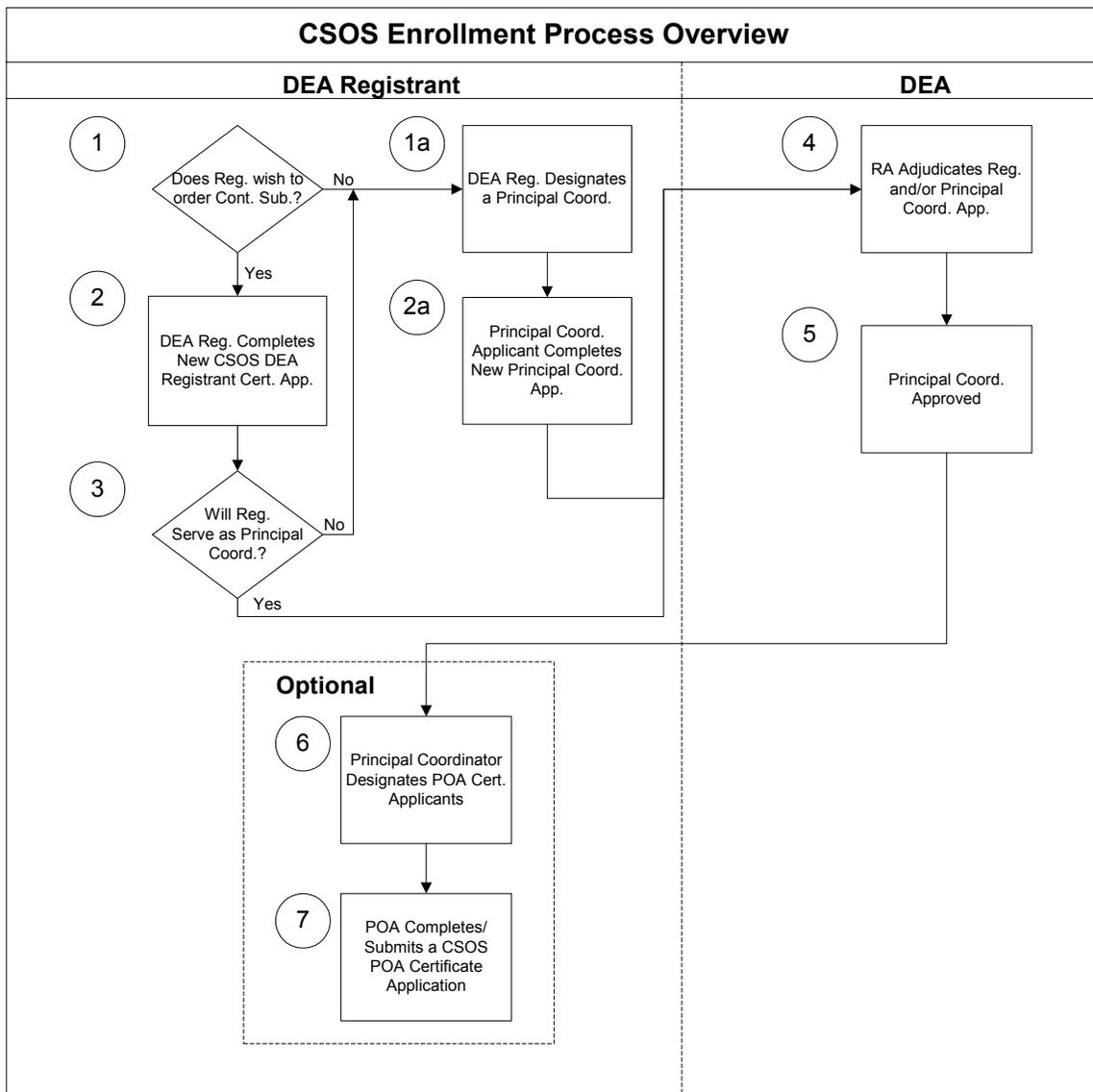


Exhibit 5–1 CSOS Enrollment Process Overview

The following steps outline the overview of initial enrollment into CSOS:

1. The individual who signed the most recent application for DEA Registration (DEA Registrant) must decide whether he/she wishes to obtain a DEA Registrant Certificate for signing controlled substance orders.
 - 1a. The DEA Registrant must designate a CSOS Principal Coordinator if he/she does not wish to obtain a DEA Registrant Certificate for signing controlled substance orders.
2. The DEA Registrant must complete a CSOS DEA Registrant Certificate Application.
 - 2a. The individual designated by the DEA Registrant to serve the role of CSOS Principal Coordinator must complete a CSOS Principal Coordinator / Alternate Coordinator Application.
3. DEA Registrants receiving DEA Registrant Certificates to sign controlled substance orders must decide if they wish to serve the role of CSOS Principal Coordinator. If the DEA Registrant does not wish to serve the role of CSOS Principal Coordinator, the DEA Registrant must designate a CSOS Principal Coordinator. The designated CSOS Principal Coordinator applicant is named on the CSOS DEA Registrant Application.
4. Completed application packages from DEA Registrant and/or Principal Coordinator applicants are sent to the RA. The RA adjudicates the applications/applicants.
5. After successful adjudication, the RA recognizes the applicant as the Principal Coordinator for the DEA Registrant(s) identified.
6. Once the Principle Coordinator has been approved, optionally a CSOS Power of Attorney Certificate Application(s) may be submitted/processed.
7. CSOS POA Certificate Applicants complete the CSOS Power of Attorney Certificate Application.

5.2 DEA Registrant Enrollment Process

Exhibit 5–2 CSOS DEA Registrant Certificate Enrollment Process diagrams the enrollment process for a new DEA Registrant applicant.

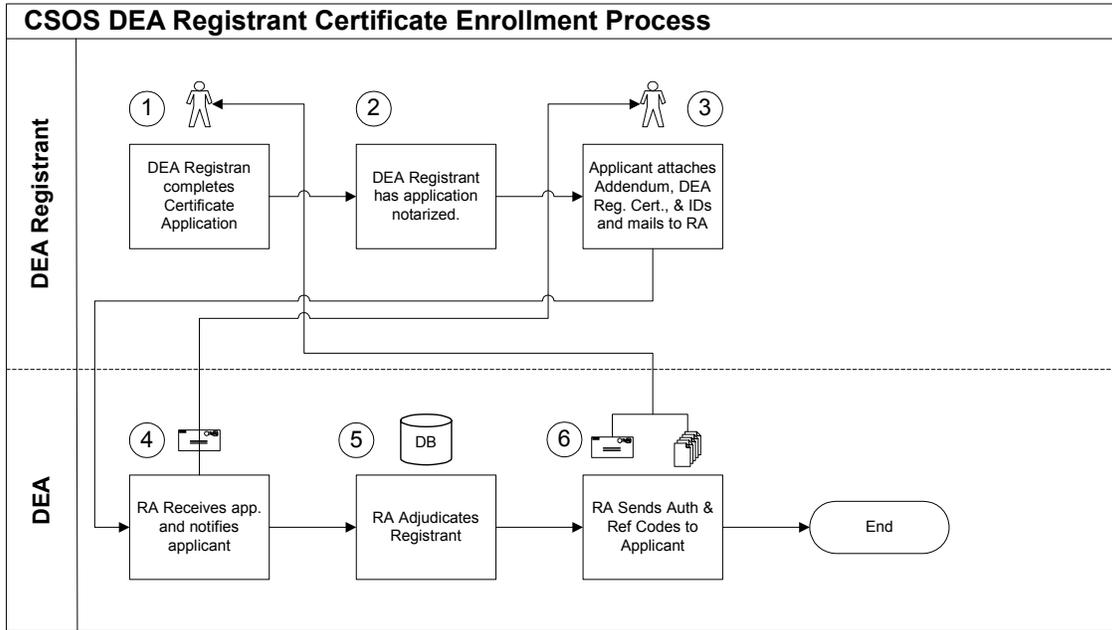


Exhibit 5–2 CSOS DEA Registrant Certificate Enrollment Process

The following steps outline the DEA Registrant Certificate Application process:

1. The applicant completes the CSOS DEA Registrant Certificate Application and the CSOS Certificate Application Registrant List Addendum(s) if applicable.
2. The applicant has the application and addendum (if applicable) notarized.
3. The applicant mails the application package to the Registration Authority with the following attachments:
 - a. Photocopy of the DEA Registration Certificate(s) for the DEA Registrant(s) identified.
 - b. The original CSOS Certificate Application Registrant List Addendum(s) (if applicable)
 - c. Photocopies of their identification documents
4. The Registration Authority notifies the applicant via e-mail upon receiving the application package.
5. The Registration Authority adjudicates the applicant. This includes:
 - a. All required information/documentation is provided.
 - b. Applicant identity – Notary information complete and identification documents match information provided on the application.

- c. Validating the DEA Registrant(s) identified – business activity, schedules and expiration.
 - d. For applicants serving the role of Principal Coordinator – the RA verifies the organization mailing address provided and the employment of individual at the provided address.
6. Upon approval, the Registration Authority sends the authorization and reference code to the applicant. The reference code is sent via e-mail. The authorization code is sent via postal mail to the address provided on the application.

5.3 CSOS Principal Coordinator / Alternate Coordinator Certificate Enrollment Process

Exhibit 5–3 CSOS Principal Coordinator / Alternate Coordinator Certificate Enrollment Process diagrams the enrollment process for a CSOS Principle Coordinator/Alternate Coordinator applicant.

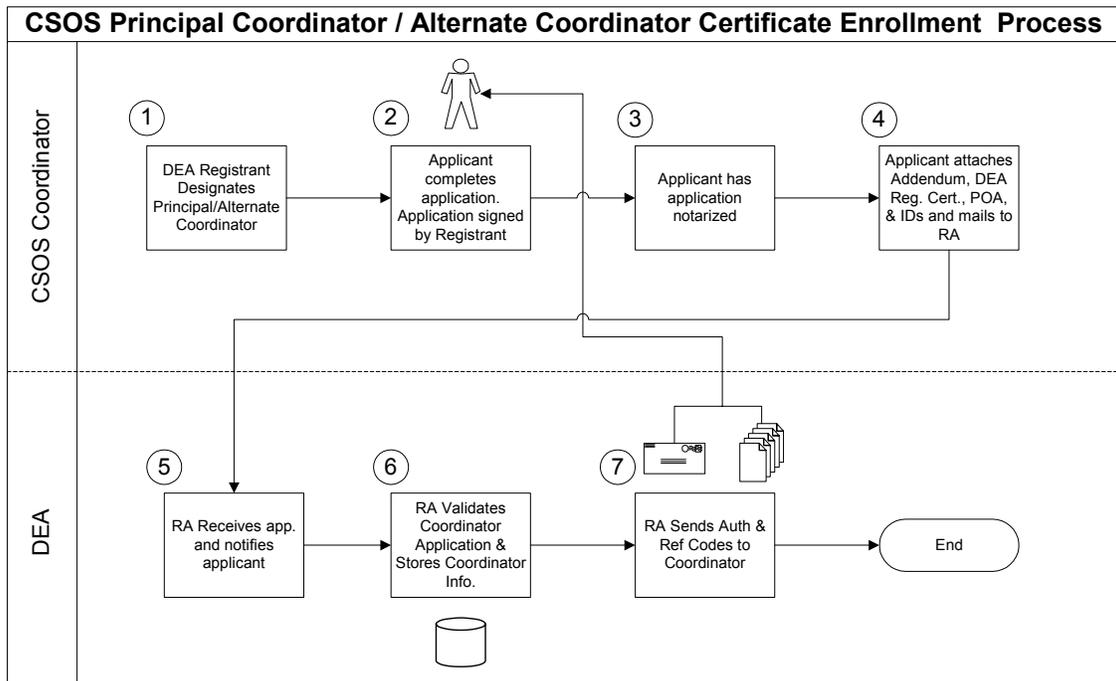


Exhibit 5–3 CSOS Principal Coordinator/Alternate Coordinator Certificate Enrollment Process

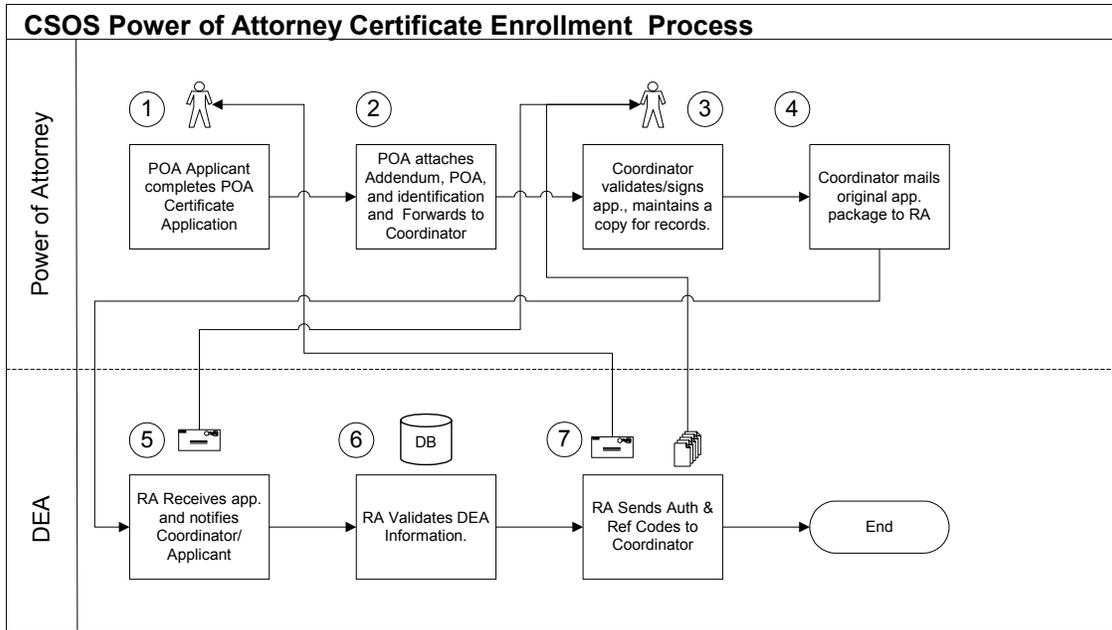
The following steps outline the CSOS Principal Coordinator / Alternate Coordinator Enrollment Process:

- 1. The DEA Registrant designates the CSOS Principal Coordinator/Alternate Coordinator applicant for the DEA Registrant(s) identified.

2. The applicant completes the application and has the application signed by the DEA Registrant.
3. The applicant has the application and addendum (if applicable) notarized.
4. The applicant mails the application package to the Registration Authority with the following attachments:
 - a. Photocopy of the DEA Registration Certificate(s) for the DEA Registrant(s) identified
 - b. Photocopy of the Power(s) of Attorney (if applicable) for the DEA Registrant(s) identified
 - c. The original CSOS Certificate Application Registrant List Addendum(s) (if applicable)
 - d. Photocopies of their identification documents
5. The Registration Authority notifies the applicant via e-mail upon receiving the application package.
6. The Registration Authority adjudicates the applicant. This includes:
 - a. All required information/documentation is provided.
 - b. Applicant identity – Notary information complete, identification documents match information provided on the application and out-of-band telephone verification of employment, position, and location through organization’s Human Resource department.
 - c. Validating the DEA Registrant(s) provided – business activity, schedules and expiration.
 - d. Verifying the organization mailing address provided and the employment of individual at the provided address.
7. Upon approval, the Registration Authority sends the authorization and reference code to the applicant. The reference code is sent via e-mail. The authorization code is sent via postal mail to the address provided on the application.

5.4 CSOS Power of Attorney Certificate Enrollment Process

Exhibit 5–4 CSOS Power of Attorney Certificate Enrollment Process diagrams the process for a CSOS Power of Attorney Certificate applicant.



5-4 CSOS Power of Attorney Certificate Enrollment Process

The following steps outline the CSOS Power of Attorney Certificate Enrollment Process:

1. The applicant completes the CSOS Power of Attorney Certificate Application.
2. The applicant forwards the application to either the Principal Coordinator or Alternate Coordinator with the following attachments:
 - a. Photocopies of the Power(s) of Attorney for the DEA Registrant(s) identified.
 - b. The original CSOS Certificate Application Registrant List Addendum(s) (if applicable)
3. The Principal Coordinator/Alternate Coordinator adjudicates the Power of Attorney applicant. This includes the following:
 - a. All required information/documentation is provided.
 - b. Applicant identity – The Principle Coordinator shall adjudicate the applicant’s identity as specified in the DEA Registrant agreement.
 - c. Signs the Affirmation of Identity Verification section of the application.
 - d. Maintains a photocopy of the application package and means of identity verification for their records.

Note: Principal Coordinator adjudication procedures further detailed in the DEA Registrant Agreement.

4. The Principal Coordinator/Alternate Coordinator forwards the original application package to the Registration Authority.
5. The Registration Authority notifies the applicant and Principal Coordinator/Alternate Coordinator via e-mail upon receiving the application package.
6. The Registration Authority validates the application and DEA Registration. This includes:
 - a. All required information/documentation is provided.
 - b. Applicant identity – Verifies the Principal Coordinator/Alternate Coordinator has signed the Affirmation of Identity Verification section of the application.
 - c. Validating DEA Registrant(s) provided – business activity, schedules and expiration.
7. Upon approval, the Registration Authority sends the reference code to the applicant via e-mail. The authorization code is sent Principal Coordinator/Alternate Coordinator via postal mail. The Principal Coordinator/Alternate Coordinator must forward the sealed authorization code to the applicant.

Section 6 — Bulk Enrollment

6.1 Bulk Enrollment Overview

Bulk Enrollment has been established to accommodate organizations that need to obtain a large volume of CSOS Certificates associated with a single applicant. Each applicant, DEA Registrant, Principal Coordinator, Alternate Coordinator, and Power of Attorney, shall complete his/her application as specified in the above processes outlined in Section 5 with the exception of how DEA Registration and Power of Attorney documentation is submitted. DEA Registration and Power of Attorney documentation will be submitted as described in Section 6.3. The CSOS Registration Authority will work with the organization's primary point of contact for bulk enrollment to ensure the DEA Registration and Power of Attorney documentation is submitted correctly.

6.2 Bulk Enrollment Qualifications

In order to participate in CSOS Bulk Enrollment, an organization must currently participate in the DEA Chain Renewal program.

6.3 Bulk Enrollment Documentation

The following subsections identify the required information and formatting of DEA Registration and Power of Attorney documentation for the bulk enrollment process.

6.3.1 DEA Registration Documentation

For the DEA Registrations for which the applicant is applying, the organization shall provide the following:

1. A printed list of the DEA Registrations (including all pertinent information such as DEA Registration Number, name, address and current expiration date) listed in order by DEA Registration Number.
2. A 3.5" diskette or CD with the DEA Registration Numbers only in alpha numeric order in ASCII format.

6.3.2 Power of Attorney Documentation

For Power of Attorney applicants, the organization shall provide a single Power of Attorney listing all of the DEA Registration Numbers for which the applicant is applying.

6.4 Bulk Enrollment Process

Exhibit 6-1 Bulk Enrollment Process diagrams the steps taken to enroll bulk applicants.

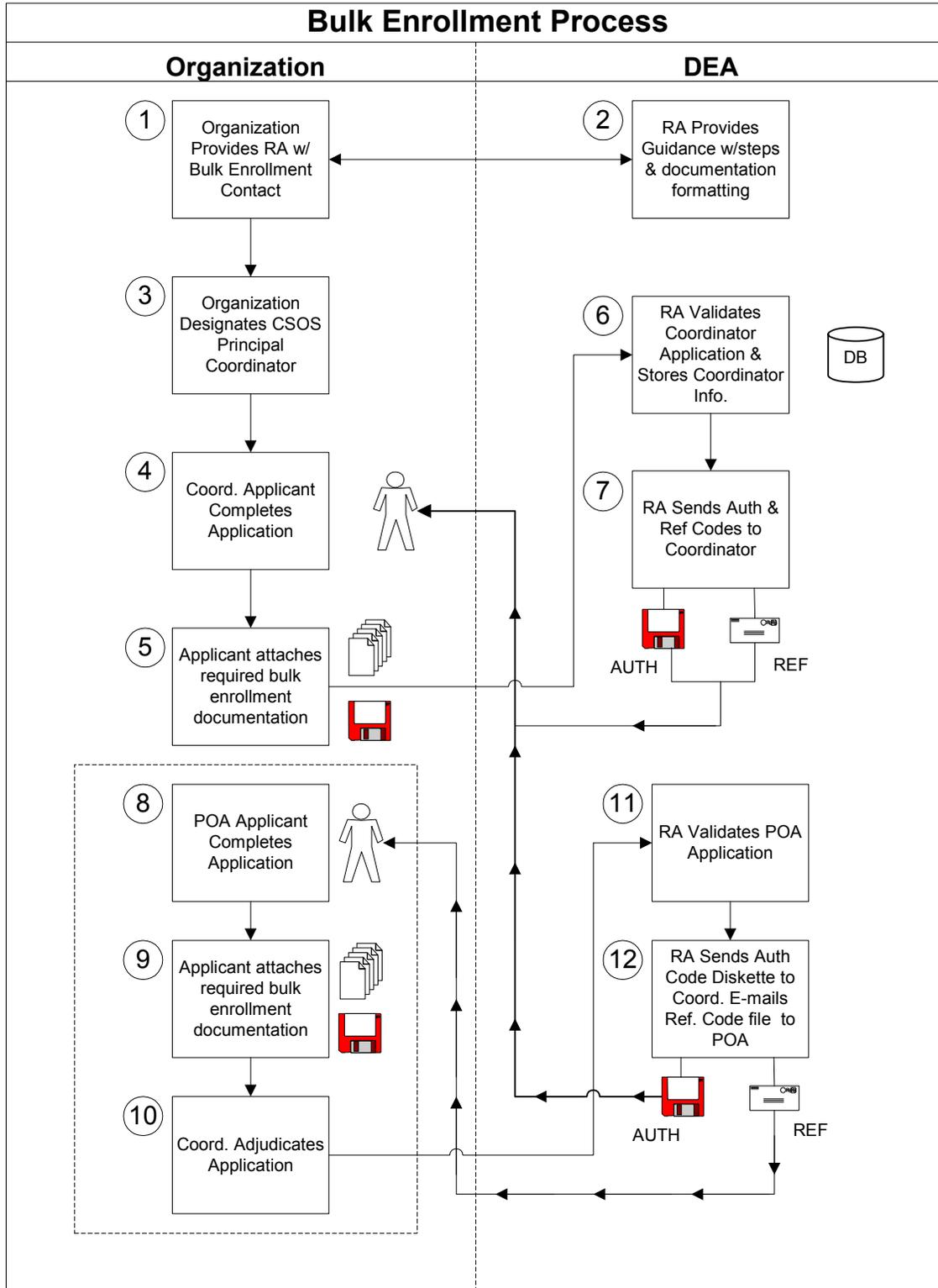


Exhibit 6-1 Bulk Enrollment Process

The following steps outline the Bulk Enrollment process:

1. The Organization provides a contact point including Corporate Name, address, telephone number, fax number, individual contact and alternate contact for the bulk enrollment process.
2. The Registration Authority works in conjunction with the organization contact to ensure DEA Registration and Power of Attorney documentation is formatted correctly.
3. The Organization designates a Principal Coordinator for the DEA Registrants for which CSOS Certificates will be issued. A Principal Coordinator must be designated for each DEA Registration participating in CSOS.
4. The Principal Coordinator applicant completes the CSOS Principal Coordinator / Alternate Coordinator Certificate Application following the process outlined in Section 5.3 with the exception of attaching DEA Registration and Power of Attorney documentation.
5. The applicant attaches the DEA Registration documentation (printed and electronic lists) and Power of Attorney documentation (if applicable) formatted for bulk enrollment.
6. The RA adjudicates the applicant in accordance with Section 5.3 step 6 and associates the applicant as the Principal Coordinator for the DEA Registrations identified in the Registration Authority database.
7. Upon approval, the Registration Authority creates two ASCII files, one containing the reference codes and one containing the authorization codes for the DEA Registrations identified. The reference code file is sent to the applicant via e-mail. The authorization code file is sent on a 3.5" diskette to the address provided by the applicant via postal mail.
8. Upon approval of the Principal Coordinator, Power of Attorney applications may be processed. The Power of Attorney applicant completes the CSOS Power of Attorney Certificate Application following the process outlined in Section 5.4 with the exception of attaching DEA Registration and Power of Attorney documentation.
9. The applicant attaches the DEA Registration documentation (printed and electronic lists) and Power of Attorney documentation formatted for bulk enrollment.
10. The Principal Coordinator/Alternate Coordinator adjudicates the applicant in accordance with Section 5.4 step 3. Upon approval the Principal Coordinator/Alternate Coordinator forwards the application package to the CSOS Registration Authority.

11. The CSOS Registration Authority validates the Power of Attorney application in accordance with Section 5.4 Step 6.
12. Upon approval, the Registration Authority creates two ASCII files, one containing the reference codes and one containing the authorization codes for the DEA Registrations identified. The reference code file is sent to the applicant via e-mail. The authorization code file is sent on a 3.5" diskette to the CSOS Principal Coordinator/Alternate Coordinator. The Principal Coordinator/Alternate Coordinator must forward the sealed authorization code to the applicant.