Supply Chain Conference Orlando, Florida



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This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

I have no financial relationship to disclose.

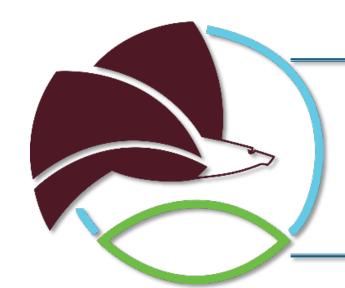
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Drug Enforcement Administration Controlled Subsistence System (CSOS)

Dunia Nooristani
Acting Unit Chief Information
System

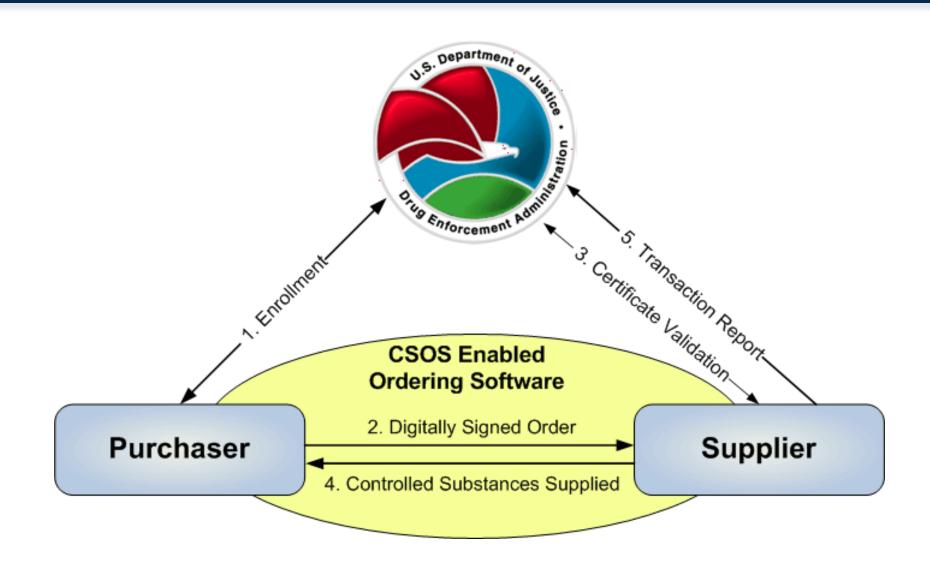
Controlled Substance Ordering System (CSOS)



- DEA's Controlled Substance Ordering System (CSOS) allows for secure electronic transmission of Schedule I-V controlled substance orders.
- A replacement for the DEA Paper 222 Order Form but may be used in conjunction with the paper order form.
- Using a technology called Public Key Infostructure (PKI), CSOS requires that each Individual purchaser enroll with DEA to acquire a CSOS digital Certificate.
- Enrollment in CSOS is optional for ordering Controlled Substances.

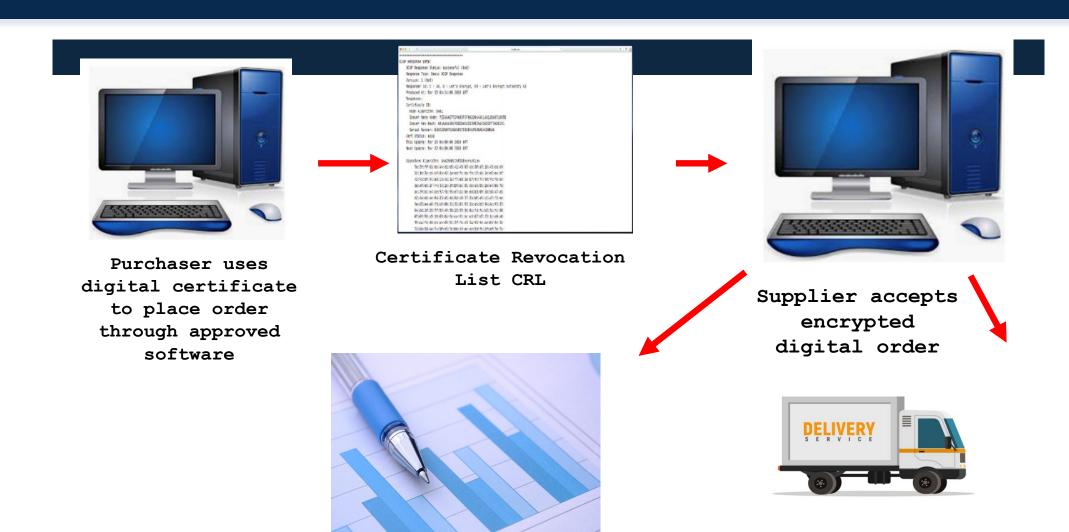
Controlled Substance Ordering System (CSOS)





Controlled Substance Ordering System (CSOS)





Digital data sent to DEA within 2 business days

Order sent to Purchaser

CSOS Certificate



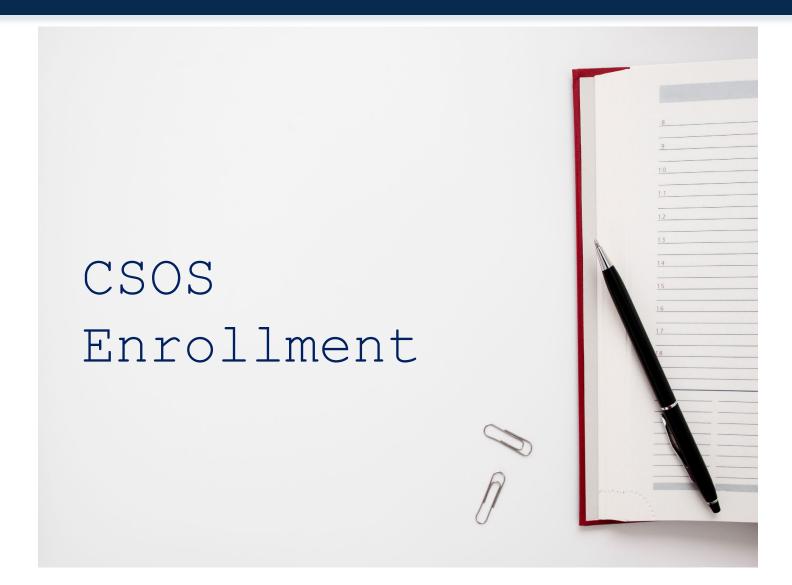
What is a CSOS Certificate?

- A CSOS Certificate is the digital equivalent of the identification information contained on a DEA Form-222.
- A CSOS Certificate is a digital identity issued by the DEA's CSOS Certification Authority (CSOS CA).
- Using a technology called PKI, CSOS Certificates are issued to *individuals* and are required for electronic ordering of Schedule I and II controlled substances.



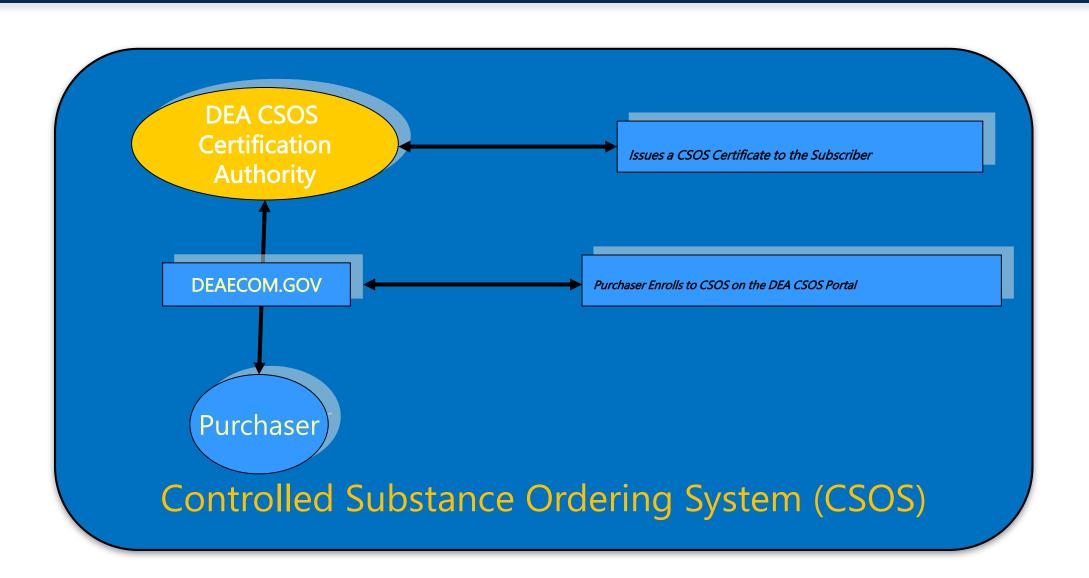
CSOS Enrollment





CSOS Enrollment Process





CSOS Overview



• On December 9, 2024, DEA launched a new, enhanced Controlled Substance Ordering System (CSOS)

 The updated CSOS program allows for the online submission of enrollment applications as well as certificate management (renewals and revocations), through a secure network application portal

 DEA stopped accepting paper applications for CSOS enrollment after January 10, 2025

 As part of this enhanced process, identity verification will occur through the login.gov portal

CSOS Overview Cont'd



• Current CSOS subscribers will only need to create an enhanced CSOS account in the portal for the following task requirements:

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.

• New registrants choosing to utilize CSOS will be required to create an account on the CSOS portal at https://www.deaecom.gov

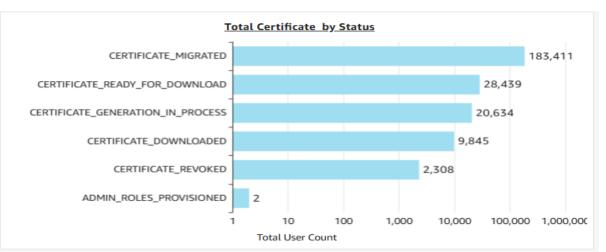
Enrollment Status - Online Portal

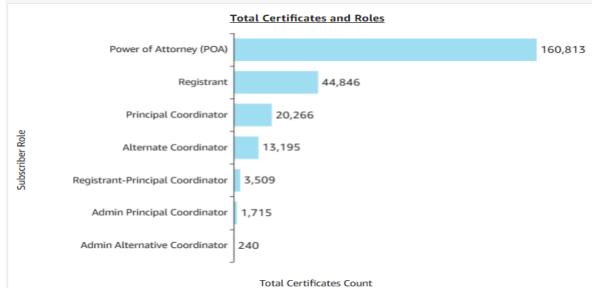


Since the launch of enhanced CSOS on December 9th, 2024











CSOS Modernization



- CSOS Subscribers are required to create a CSOS online account
- The online account creation requires identity verification and profile creation
- Identity verification is done via Login.gov

Subscribers who already have a Login.gov account would simply have to sign in to their account.

Subscriber who do not have a Login.gov account would need to provide a State issued ID, SSN, phone number and an email

• CSOS profile creation requires subscribers to setup Multifactor Authentication (MFA)

Subscriber could use email or 3rd party application to receive MFA codes

• CSOS legacy Subscribers who's CSOS certificates are in ACTIVE status will be migrated automatically

CSOS Modernization Cont'd



Enrollment System - Eliminates the paper applications and notary requirements

- User portal with Self service capabilities
- Digital identity verification via Login.gov
- Automated backend processes for single or bulk requests
 - Enrollment request submission
 - Enrollment approval
 - Subscriber provisioning
- Automated revocation process
 - Self service revocation
 - Revocation by DEA Diversion Control Investigators
 - Revocation by CSOS Registration Authority (RA)
 - Revocation by Registrants and Coordinators
- Automated renewal process

Certificate Authority (CA) - Stays the same as CSOS 1.0

CSOS Subscriber Roles & Certificates



- Modernized CSOS consists of the following Roles and Certificates assignments
 - Registrant Signing Certificate
 - Principle Coordinator Signing Certificate
 - Alternate Coordinator Signing Certificate
 - Power of Attorney (POA) Signing Certificate
 - Administrative Principal Coordinator No Certificate required
 - Administrative Alternate Coordinator No Certificate required

CSOS Subscriber Roles & Certificates Cont'd



- Modernized CSOS approval hierarchy for the following Roles
 - First Registrant The first Registrant role is approved by the CSOS Registration Authority team
 - Additional Registrant Approved by the first Registrant
 - Principle Coordinator Approved/Revoked by the Registrant
 - Alternate Coordinator Approved/Revoked by the Registrant
 - Administrative Principal Coordinator Approved/Revoked by the Registrant
 - Administrative Alternate Coordinator Approved/Revoked by the Registrant
 - Power of Attorney (POA) Approved/Revoked by the Registrant. Only Revoked by the Coordinator.

CSOS Registrant Approval



Request Approval Form
The following user has requested a certificate for the below DEA registration(s). Request ID: 1518 Request Date: 03-13-2025 Requester First Name: CSOS Requester Last Name: POA Requester Email: CSOS.POA@EXORSOLUTIONS.COM Requested Certificate: Power of Attorney
Registration Number(s): AB1431181
As a Registrant make sure that you have provided POA letter. Select below to indicate POA Letter has been provided before proceeding. Applicant received POA letter
Approver Comments: Comments: Reject Request

CSOS Subscriber Roles & Certificates Cont'd





• DEA's Registration Authority is responsible for verifying Registrant role for the first Registrant who enrolls in CSOS Portal

This is done via verifying DEA Registration records through RICS

If RICS records do not match the name of the Registrant on file a follow-up call is made by the Registration Authority team

- Once the First Registrant is approved by the Registration Authority team any other roles will be approved by the first registrant.
- Subscribers can check the status of a CSOS Enrollment, Renewal, Revocation on the portal

Submitted - All initial verification has been completed, and request has been submitted. Subscriber can cancel a request while in this status.

In Process - Request has been assigned to approver.

Certificate Generation in process - Request has been approved and send to the Certificate Authority team.

Certificate Ready to Download - Certificate has been generated, and Z form has been sent out for retrieval.

Certificate Downloaded - CSOS certificate has been retrieved by the subscriber

CSOS Website





ABOUT US

REGISTRATION

REPORTING

■ DEA.Registration.Help@dea.gov

CONTACTUS

L 1.800.882.9539

Controlled Substance Ordering System (CSOS)

HOME > REGISTRATIONS > CSOS

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External Links



Department of Justice





News & Updates

Virtual Training Sessions

- CSOS Enhancements-Letter to Registrants (December 9, 2024)
- CSOS Enhancements-Letter to Registrants (November 12, 2024)
- CSOS Enhancements—Letter to Practitioners (October 16, 2024)
- CSOS Enhancements-Letter to all other registrants (October 15, 2024)

DEA's Controlled Substance Ordering System (CSOS) is designed to provide services to DEAregistered pharmaceutical drug manufacturers, distributors, pharmacies, hospitals, and others to transmit customers' orders electronically.

Virtual training sessions on the CSOS are available in January 2025.

FAQ: Secure Hashing Algorithm (SHA) Transition

CSOS Questions & Answers







For Purchasers

For Suppliers

For Developers

For Purchasers

CSOS allows for secure electronic transmission of Schedule I-V controlled substance orders without the supporting paper Form 222.

- · Enroll in CSOS
- Learn about CSOS
- Activate/Retrieve your certificate(s)
- Transfer certificate(s) to another computer
- · Learn about electronic ordering
- Renew certificate(s)

CSOS Login Page





Diversion Control Division

Drug Enforcement Administration

Controlled Substance Ordering System (CSOS)

Home

Frequently Asked Questions

Welcome to CSOS Login



WARNING

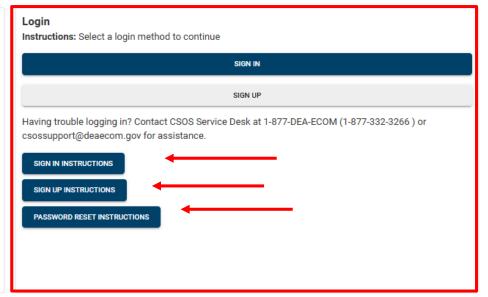
You are accessing U.S. Government information technology and/or information systems which includes:

- (1) this information technology,
- (2) this information system,
- (3) all information technology devices connected to this network, and
- (4) all devices and storage media attached to this information system or to information technology on this network.

This information technology and information system is provided for U.S. Government-authorized use only. Unauthorized or improper use may result in disciplinary action as well as civil and/or criminal penalties. By using this information technology and/or information system, you understand and consent to the following:

- You have no reasonable expectation of privacy regarding any communications transmitted through or data stored on this information technology and/or information system. At any time, the government may monitor, intercept, search and/or seize data transiting or stored on this information technology and/or information system.
- Any communication transmitted through or data stored on this information technology and/or information system may be disclosed or used for any lawful government purpose.
- Your consent is final and irrevocable. You may not rely on any statements or informal policies purporting to provide you with any expectation of privacy regarding communications on this system.

For further information, see the Department order on Use and Monitoring of DOJ Information Technology, Information Systems, and Access to an Authorized Users' Electronic Information.



CSOS System Authentication and Approval Workflow



Authentication and Single Sign-On (SSO)

- Multifactor Authentication for CSOS Login
 - Subscribers are required to log in to the CSOS system using multifactor authentication (MFA) to enhance security.
- Single Sign-On (SSO)
 - Once authenticated, subscribers can navigate seamlessly between the CSOS enrollment system and the CSOS approval system using Single Sign-On (SSO).
 - SSO allows users to access multiple related systems without needing to log in separately to each one, improving user experience and efficiency.

Automated Approval Task Assignment

- POA Certificate Requests
 - Power of Attorney (POA) requests for a new certificate or renewal of an existing certificate are automatically assigned to a Registrant.
 - The Registrant is responsible for reviewing and approving or rejecting the requests.

Approval Timeframe

- Registrants have 10 days to approve or reject the POA requests.
- If the Registrant does not act within 10 days, the request is automatically escalated to another Registrant, if available in the system.

Automatic Escalation Process

• If no additional Registrant is available in the system, the POA requests are assigned to the DEA Registrant

CSOS Enrollment



What the applicant will receive:

- The applicant will receive a pair of activation notices for each certificate issued.
- An E-mail activation notice will be sent for each certificate, which will contain an Access Code unique to that certificate.
- A postal mailed activation notice will be sent for each certificate, which will contain an Access Code Password unique to that certificate as well as information for logging in to DEA's secure certificate retrieval Web site
- The codes must be entered on the DEA E-Commerce Web site in order to retrieve the digital certificate.
- https://www.deaecom.gov/retrieve.html

CSOS Certificate Retrieval



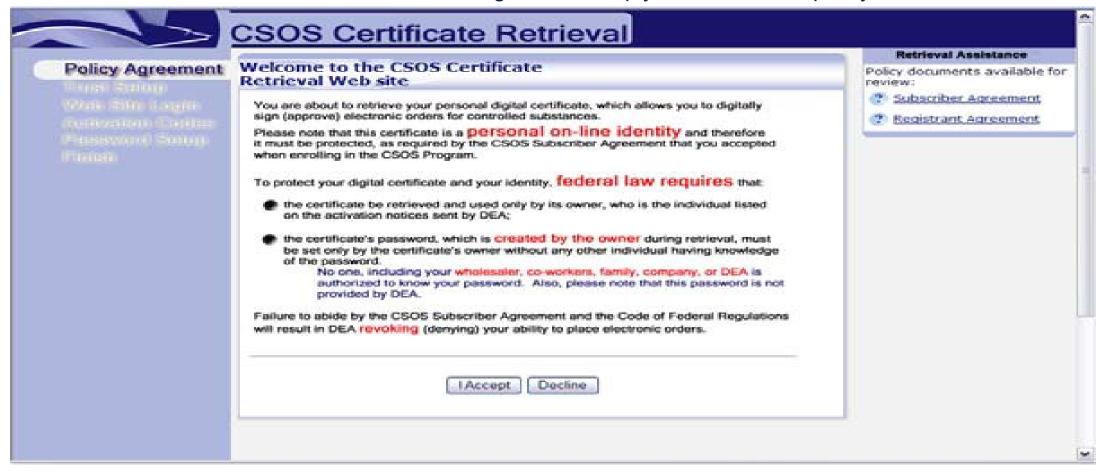
- DEA strongly recommends using
 - -Firefox (versions 15-57, 60 and above)
- Once your CSOS Certificate is ready to be retrieved (downloaded):
- E-mail activation notice from CSOS2@deaecom.gov. one notice will be sent for each Certificate that you have been issued This notice will contain an Access Code, which you will need to retrieve your Certificate.
- An accompanying postal mail activation notice will be sent on the same day as your E-mail(s).
- Activating your certificate must be done within <u>60 days</u> of the date printed on your postal mailed activation notice.
- The E-mail and postal mailed activation notices may be matched using either the DEA Registration number or Certificate Serial Number.
- Use the information in your postal mail activation notice along with the Access Code from the accompanying E-mail to retrieve your Certificate from the DEA E-Commerce Website.



CSOS Certificate Retrieval - Policy Agreement



• The owner of the certificate is required to review the following policy information, and click **I Accept** to indicate that he/she understands and agrees to comply with the stated policy.



CSOS Certificate Retrieval - Web Site Login



DEA Diversion E-Commerce Support

Phone: 1-877-DEA-ECOM (1-877-332-3266)

E-Mail: csossupport@DEAecom.gov

IMPORTANT INFORMATION ON ACTIVATING YOUR CSOS CERTIFICATE

Combine this information with the access code you received via E-Mail for this DEA Registration

Number. Please retain this document for future management of your certificate.

Name John Smith

E-Mail address: John Smith@Internet.com

CSOS Account Number: 0000

Certificate Serial Number: R00002005001

CA Thumbprint (SHA-1): FERF F1A8 F348 4ABD A146 F64B 5760 21C7 AAAB 43AF

Step 1 - Locate your E-Mail containing this same DEA Registration Number

DEA Registration Number: XX1234567

Step 2 - Use this information to log in to the DEA E-Commerce Certificate Retrieval Web page

Web site Address: < Web site Address>
Web site Username: < Web site Username>
Web site Password: < Web site Password>

Step 3 - Use this Access Code Password, along with the Access Code from your E-Mail to activate your certificate

Access Code Password: Access Code Password

Successful CSOS Certificate Retrieval



 CSOS Certificate has been created and installed on the computer. At this point, the user can contact their wholesaler or software vendor or retrieve additional certificates.



CSOS Certificate Policy



- Do not disclose the Certificate's password to anyone.
- Activate CSOS Certificates on the computer that will be used for electronic ordering of controlled substances.
- Certificates may be transferred to other computers.
- To place an electronic order, the certificate will need to be present on the ordering computer.
- Use only Firefox browsers.
- Only the owner of the certificate may retrieve it.
- Certificates may only be retrieved once.

CSOS Certificate Renewals



• The Subscriber (certificate owner) are notified of Certificate expiration via **E-mail 45 days prior to** the expiration date.

• The subscriber's E-mail is a **notification** with a **link** to the CSOS portal.

• Certificates may be renewed electronically up to **two times**. After two electronic renewals, the applicant must go through Login.gov for identity verification.

CSOS Certificate Renewals



- A CSOS Signing Certificate is associated with a DEA Registration.
- The certificate is set to expire when the current DEA Registration expires (based on the Registration's expiration date at the time of certificate issuance).

CSOS Certificate Revocation



- Revocation is the process of invalidating a CSOS Certificate before its expiration date.
- Revoked certificates are permanently added to the CSOS CA's Certificate Revocation List (CRL). Since suppliers are required to check this list to verify the validity of each Certificate, revoked certificates will not pass validation.

CSOS Certificate Revocation - Reasons for Revocation



- Common reasons for revocation include:
- Termination of the subscriber's employment
- Changes in subscriber information
 - Legal name change
 - Change of E-mail address
- Changes in DEA Registration information
 - Registration number changed or no longer used
 - Change of authorized schedules
 - Change of address or registration name
- Policy violations
- Private key compromise (i.e. theft and/or unauthorized usage)

CSOS Certificate Revocation - Methods



- Certificates may be revoked by the following individuals:
 - -The subscriber (i.e., owner of the certificate)
 - Registrant can revoke Coordinators and POAs
 - Coordinator can revoke POAs
- Diversion Investigator can revoke during an investigation
 - Registration Authority can revoke

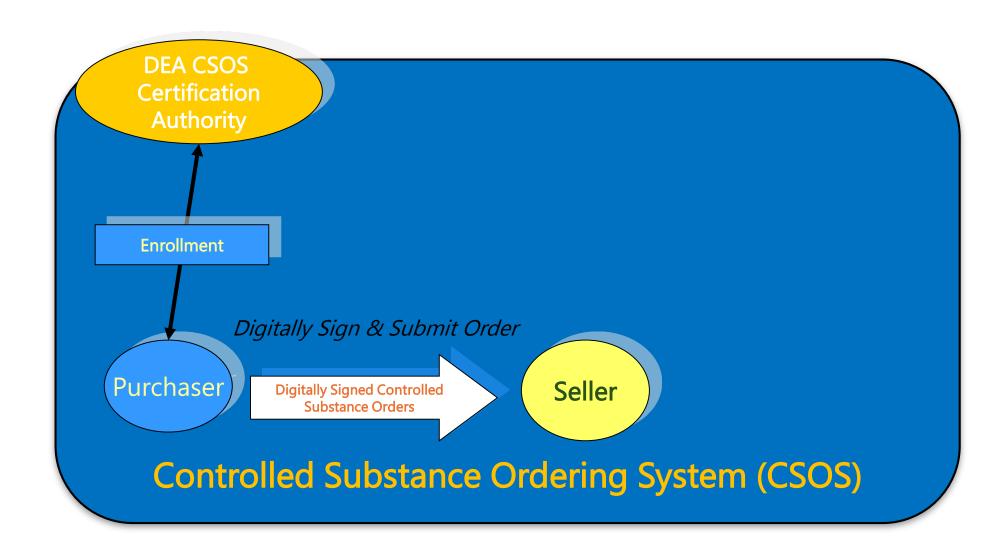


Ordering Process



CSOS Ordering Process





CSOS Ordering Process



CSOS Ordering - Establish a Supplier







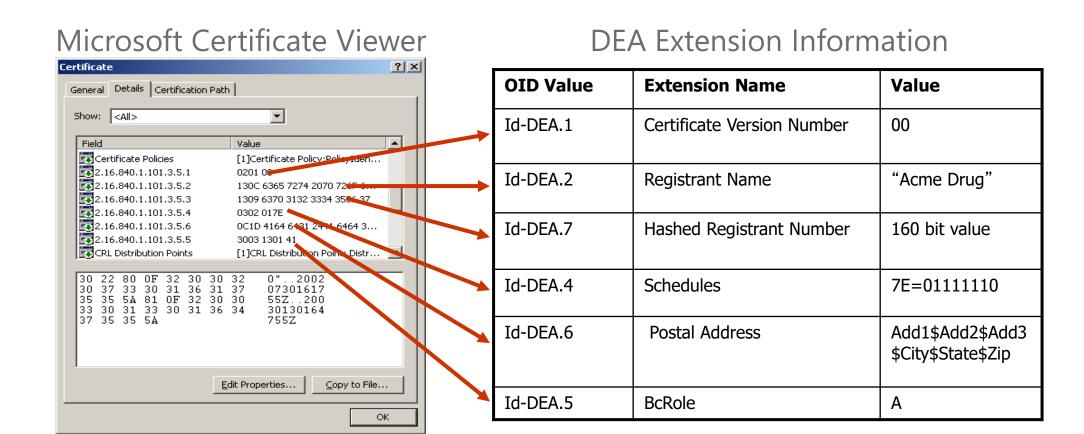
Electronic Orders

• Transmitting a Purchase Order



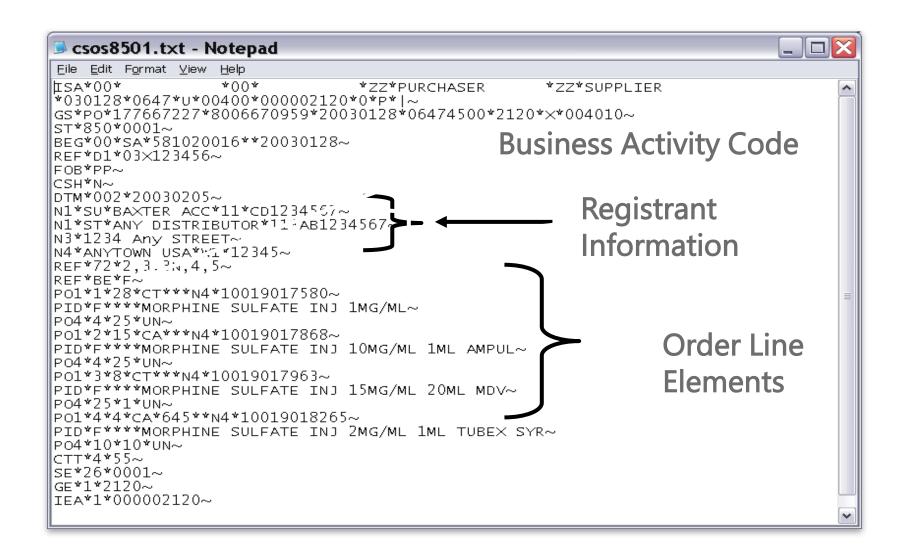
CSOS Electronic Order - Digital Certificate Decoded





CSOS Electronic Order (Example)

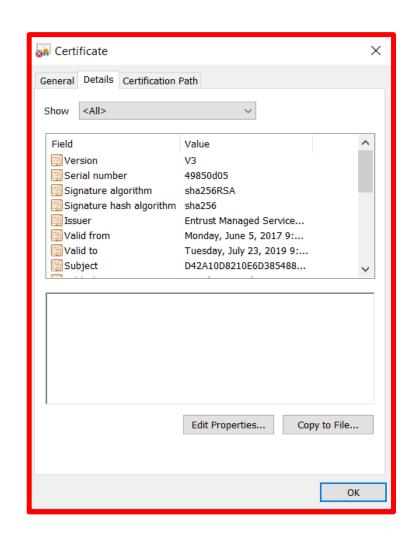




CSOS Certificate View



• Once downloaded, the certificate is stored in the browser on the user's computer



Contact Information





DEA.Registration.Help@dea.gov

REPORTING

RESOURCES

REGISTRATION

1.800.882.9539

DEA Diversion E-Commerce Support

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- >Contact Support

Contact Information

Self Help:

www.DEAecom.gov has a number of on-line resources to assist CSOS customers with program enrollment and certificate retrieval. Additionally, many frequently asked questions have been answered on our Q & A's page.

On-line customer support resources

ABOUT US

• Answers to frequently asked questions

E-mail:

Online Support Request Form

Phone:

1-877-DEA-ECOM (1-877-332-3266) toll free

Our support staff is available 8:30 AM through 5:50 PM (Eastern Time) Monday through Friday.

Postal Mail:

Standard mail (preferred):

Drug Enforcement Administration Sterling Park Technology Center/CSOS 8701 Morrissette Drive Springfield, VA 22152

Overnight or express mail only:

Drug Enforcement Administration Sterling Park Technology Center/CSOS 8701 Morrissette Drive Springfield, VA 22152

Use the overnight/express mail address for all UPS, FedEx, DHL, and Priority Mail USPS packages.

External Links



Department of Justice



CSOS Questions











Thank You!

Dunia Nooristani

Acting Unit Chief Information

System

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