

Supply Chain Conference Orlando, Florida



April 1 – April 3, 2025





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Drug Enforcement Administration

Controlled Subsistence System (CSOS)

Dunia Nooristani Acting Unit Chief Information System

- 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







- 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





• 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. Benevals - If you are renewing a CSOS certificate. It is recommended to

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 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







- 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



• 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

1.

	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
	Requester Comments:
	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
ŀ	
	Approver Comments:
	Comments:





• 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



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

Diversion Control Division Drug Enforcement Administration	Controlled Substance Ordering	g System (CSOS)
Home Frequently Asked Questions Welcome to CSOS Login]	
WARNING You are accessing U.S. Government information tec	hnology and/or information systems which includes:	Login Instructions: Select a login method to continue
 (1) this information technology, (2) this information system, (3) all information technology devices connected to (4) all devices and storage media attached to this in 	this network, and formation technology on this network.	SIGN IN SIGN UP
	n is provided for U.S. Government-authorized use only. Unauthorized or improper use may result in disciplinary Ising this information technology and/or information system, you understand and consent to the following:	Having trouble logging in? Contact CSOS Service Desk at 1-877-DEA-ECOM (1-877-332-3266) or csossupport@deaecom.gov for assistance.
 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 technology and/or information technology and/or information technology and/or information transmitted through or data stored on this information system may be disclosed or used for any lawful government purpose. You 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 and the system. 		
For further information, see the Department order o Users' Electronic Information.	n Use and Monitoring of DOJ Information Technology, Information Systems, and Access to an Authorized	

CSOS Login Page



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 Authority (RA)





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.

		Retrieval Assistance
The Task is a few of the State of the Task State of the S	Velcome to the CSOS Certificate You are about to retrieve your personal digital certificate, which allows you to digitally sign (approve) electronic orders for controlled substances. Please note that this certificate is a DerSonal on-line identity and therefore it must be protected, as required by the CSOS Subscriber Agreement that you accepted when enrolling in the CSOS Program. To protect your digital certificate and your identity. federal law requires that: • the certificate be retrieved and used only by its owner, who is the individual listed on the activation notices sent by DEA: • the certificate's password, which is created by the owner during retrieval, must be set only by the certificate's owner without any other individual having knowledge of the password. Also, please note that this password is not provided by DEA. Failure to ablide by the CSOS Subscriber Agreement and the Code of Federal Regulations will result in DEA revoking (denying) your ability to place electronic orders.	Retrieval Assistance Policy documents available for review: Subscriber Agreement Registrant Agreement





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. DEA Diversion E- Commerce Support E-Mail: <u>csossupport@DEAecom.gov</u> Fhone: 1-877-DEA-ECOM (1-877-332-3266)

Name:	John Smith
E-Mail address:	John.Smith@Internet.com
CSOS Account Number:	0000
Certificate Serial Number:	R00002005001
C.A. Thumbprint (SHA-1):	FFRF F1A8 F348 4ABD A146 F64B 5760 21C7 AAAB 43AF
Step 1 – Locate your E-Mail con	taining this same DEA Registration Number
DEA Registration Number:	XX1234567
Step 2 – Use this information to I	log in to the DEA E-Commerce Certificate Retrieval Web page
Web site Address:	<web address="" site=""></web>
Web site Username:	<web site="" username=""></web>
Web site Password:	<web password="" site=""></web>
Step 3 – Use this Access Code Pa	ssword, 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**.



• 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.





- 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).





- 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.



- 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)



• 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

CSOS Ordering Process





Ordering Process



CSOS Ordering Process



CSOS Ordering Process



CSOS Ordering - Establish a Supplier



CSOS Electronic Orders





• Electronic Orders

• Transmitting a Purchase Order





Microsoft Certificate Viewer

Certificate ? × **OID Value Extension Name** Value General Details Certification Path -Show: <All> **Certificate Version Number** Id-DEA.1 00 Field Value Certificate Policies 2.16.840.1.101.3.5.1 2.16.840.1.101.3.5.2 2.16.840.1.101.3.5.3 2.16.840.1.101.3.5.4 2.16.840.1.101.3.5.6 2.16.840.1.101.3.5.5 CRL Distribution Points [1]Certificate Policy:Policy.taen... 0201 00 "Acme Drug" Id-DEA.2 **Registrant Name** 130C 6365 7274 2070 726 1309 6370 3132 3334 3556 37 0302 017E 🛰 0C1D 4164 6431 2414 6464 3... Id-DEA.7 Hashed Registrant Number 160 bit value 3003 1301 41 [1]CRL Distribution Point: Distr... 30 22 80 0F 32 30 30 32 30 37 33 30 31 36 31 37 35 35 54 81 0F 32 30 30 0"..2002 07301617 Id-DEA.4 Schedules 7E=01111110 55Z..200 33 30 31 33 30 31 36 34 37 35 35 5A 30130164 755Z Id-DEA.6 Postal Address Add1\$Add2\$Add3 \$City\$State\$Zip Edit Properties... ⊆opy to File... Id-DEA.5 **BcRole** Α OK

DEA Extension Information



csos8501.txt - Notepad			_	
ile <u>E</u> dit F <u>o</u> rmat ⊻iew <u>H</u> elp				
	PURCHASER	*ZZ*SUPPLIE	R	
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1*ST*ANY DISTRIBUTOR*11 AB1234567~	>		lant	
3*1234 Any STREET~		Inform	nation	
4*ANYTOWN USA*%1*12345~	_	шоп	Πατίθη	
EF*72*2,3,3;3,4,5~ EF*BE*F~				
=F*BE*F~ 01*1*28*CT***N4*10019017580~				
ID*F****MORPHINE SULFATE INJ 1MG/M	L~			
04*4*25*UN~				
01*2*15*CA***N4*10019017868~	.	$\mathbf{>}$	Order Line	2
ID*F****MORPHINE SULFATE INJ 10MG/ 04*4*25*uN~	ML IML AMPUL~		Older Line	
04*4*23*0N~ 01*3*8*CT***N4*10019017963~				
ID*F****MORPHINE SULFATE INJ 15MG/	ML 20ML MDV~		Elements	
04*25*1*UN~		J		
01*4*4*CA*645**N4*10019018265~	-			
ID*F****MORPHINE SULFATE INJ 2MG/M	L IML TUBEX S	SYR~		
04*10*10*UN~ TT*4*55~				
=*26*0001~				
E*1*2120~				
EA*1*000002120~				

CSOS Certificate View

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

Certificate	×	(
General Details Certification	Path	
Show <all></all>	~	
Field Field Serial number Signature algorithm Signature hash algorithm Valid from Subject Subject	Value V3 49850d05 sha256RSA sha256 Entrust Managed Service Monday, June 5, 2017 9: Tuesday, July 23, 2019 9: D42A10D8210E6D385488 V	
	Edit Properties Copy to File	
	ОК	

Contact Information





DEA Diversion E-Commerce Support

HOME > REGISTRATIONS > CSOS > DEA DIVERSION E-COMMERCE SUPPORT

	Contact Information			
Navigation	Self Help:			
>Home	www.DEAecom.gov has a number of on-line resources to assist CSOS customers with			
>About CSOS	program enrollment and certificate retrieval. Additionally, many frequently asked questions			
>Policies	have been answered on our Q & A's page.			
>CSOS Final Rule	On-line customer support resources			
>Certificate Policy	Answers to frequently asked questions			
>PKI Cert and CRL Profile	E-mail:			
>Subscriber Agreement	Online Support Request Form			
>Privacy Policy	Phone:			
>Enroll in CSOS				
>Certificate Management	1-877-DEA-ECOM (1-877-332-3266) toll free			
>CSOS Reporting	Our support staff is available 8:30 AM through 5:50 PM (Eastern Time) Monday through Friday.			
>Developer Utilities				
>Contact Support	Postal Mail:			

Standard mail (preferred):

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



External Links

Department of Justice

S.C. C.C.



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.

CSOS Questions













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