

Supply Chain Conference Orlando, Florida



April 1 – April 3, 2025

DRUG ENFORCEMENT ADMINISTRATION



Sam Weisman Data Systems Analyst









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ARCOS Reporting





Overview





21 U.S.C. § 827(b) – Availability of Records 21 U.S.C. § 827(d) – Periodic Reports 21 U.S.C. § 827(j) – Electronic Reporting

[https://uscode.house.gov/]





21 C.F.R. § 1304.04 – Maintenance of Records 21 C.F.R. § 1304.33 – Reports to ARCOS

[https://www.ecfr.gov/]



WHO REPORTS TO ARCOS?



Manufacturers, to include re-packagers & re-labelers (per 21 U.S.C. § 802(15))

Distributors

Reverse Distributors

WHO REPORTS TO ARCOS?





If a company has additional registration types, only those three registration types report to ARCOS

Any other registration type would only appear on the other end of an ARCOS transaction (associate registration)

WHO REPORTS TO ARCOS?



If a company has multiple reportable registrations, central reporting is an option

Notify us before beginning this type of reporting so we can set up our system accordingly

REPORTING FREQUENCIES



- Acquisition/Distribution transaction
 reports = due 15th day of the month
 following the end of the reporting period
- Manufacturing = include in quarterly/monthly reports or in 4th quarter/December report; due 15th of the month following the end of the reporting period





Inventory transactions = due January 15th

* 21 C.F.R. § 1304 - Reports

REPORTING FREQUENCIES



Quarterly or monthly frequency permitted

- All submissions must reflect your selected reporting frequency
- Please wait until the end of a quarter to change reporting frequencies

REPORTABLE SCHEDULES



ARCOS reportable drugs are ...

- ✓ All Schedule 1 controlled substances
- ✓ All Schedule 2 controlled substances
- ✓ Schedule 3 narcotics and GHB preps
- Selected Schedule 3 and 4 psychotropics, for which manufacturing must be reported (21 C.F.R. § 1304.33(d))

REPORTABLE SCHEDULES



Notes regarding reportable drugs:

- The updated Handbook will likely result in changes to how activities are reported to ARCOS
- Avoid submitting transactions involving non-reportable drugs (unless otherwise instructed)

REPORTABLE SCHEDULES



In general, any increases and decreases to inventory of ARCOS reportable drugs, along with end-ofyear inventory and manufacturing activities



Increases to inventory include ...

- V Purchases/Receipt of supply
- Returns from customers
- Returns from Gov't or law enforcement
- Received for the purpose of destruction



Decreases to inventory include ...

- ✓ Sales/transfer of supply
- Thefts, losses, spillage
- ✓ Destruction
- Seizure/receipt by Gov't

Manufacturing includes (examples) ...

- Material manufactured
- Use of material to create a preparation in another schedule
- Waste recovered from manufacturing
- Stability or quality testing



ARCOS inventory reporting ...

- End-of-year; snapshot of what was on hand (ARCOS reportable) at close of business December 31st
- Inventory reporting resulting from a schedule change; substance becomes ARCOS reportable

Notes regarding reportable activities:

- Again, the updated Handbook will likely result in changes to how certain activities are reported to ARCOS
- Must report "no activity"
- Must report "no end-of-year inventory"

Notes regarding reportable activities:

- Increases and decreases should be reported using the date on which the activity actually occurred
- Manufacturing totals should be reported per period or per year





Transactions are to be reported from the perspective of the reporting registrant









Transaction Record

TRANSACTION RECORD / 80-CHARACTER STRING

| FIELD | POSITION (TEXT FILE) | SAMPLE DATA |
|------------------------|-----------------------------|-------------|
| REPORTING REGISTRANT | 1 - 9 | RS9999999 |
| TRANSACTION CODE | 10 | Ρ |
| ACTION INDICATOR | 11 | 1 |
| NATIONAL DRUG CODE | 12 - 22 | 123450123** |
| QUANTITY | 23 - 30 | 0000002 |
| UNIT | 31 | 3 |
| ASSOCIATE REGISTRATION | 32 - 40 | BA8888888 |
| ORDER FORM NUMBER | 41 - 49 | 231234567 |
| TRANSACTION DATE | 50 - 57 | 01152024 |
| CORRECTION NUMBER | 58 - 65 | 87654321 |
| STRENGTH | 66 - 69 | 1000 |
| TRANSACTION IDENTIFIER | 70 - 79 | 000000001 |
| (BLANK) | 80 | |

TRANSACTION RECORD / 80-CHARACTER STRING





| ARCOS/S | ORS Online: Add Transa | ction | | | | | | |
|-----------|--------------------------------|----------------------|-----------------------------|------------------|--------------------------|--------------|---------------|--------|
| Trans Cod | de Key (Enter '=' to set a fie | ld to the value fron | n the most recently entered | d transaction, w | hich, if present, is sho | own next) | | 🕜 Help |
| Tr. Code | NDC Number | Quantity | Unit Code | Strength | Assoc. Reg. # | Order Form # | Trans Date | |
| -?- 🗸 | | | -Optional- | | | | | |
| -?- | | | -Optional- | | | | | |



Increases to inventory:

- P → Purchase/Receipt
- R / V → Return/Unsolicited Return
- G → Received from Government



Decreases to inventory:

- S → Sale/Transfer
- $T \rightarrow Theft$
- $Y \rightarrow Destruction$
- Z → Seizure/Transfer to Government



Inventory:

- 1 → Schedule Change Inventory
- 3 → End-of-Year Inventory
- 4 → In-Process End-of-Year Inventory
- 8 → No Reportable End-of-Year Inventory



Manufacturing:

- M → Substance Manufactured
- K → Used in Creating a Preparation
- N → Non-recoverable Waste
- W → Recovered Waste
- U → Used in Production/Conversion



Manufacturing:

- L → Reversing/Recovery of Original Substance
- Q → Samples Pulled (quality testing, etc.)
- J → Return of Samples Pulled









■ 7 → No ARCOS Reportable Activity

■ X → Lost-in-Transit (explanatory only)



- Do not use Trans Code "5" (Special Inventory) unless directed to do so
- Destruction (Code "Y") must be reported by the registrant performing the actual destruction; transfer to reverse distributor uses Code "S" (sale/transfer)



ACTION INDICATORS





Used to initiate 3 "actions":

- ➤ Action Indicator "I" → Insert a transaction from a prior reporting period
- ➤ Action Indicator "D" → Delete a transaction from a previously submitted report
- ➤ Action Indicators "D" & "A" paired → Adjust a previously submitted transaction

ACTION INDICATORS



Notes regarding Action Indicators:

- Only apply to text file submissions; ARCOS Online uses buttons
- Action Indicator "D" cannot be used to delete an error transaction; this must be done in ARCOS Online
ACTION INDICATORS



Notes regarding Action Indicators:

Action Indicators "D" & "A" cannot be used to adjust an error transaction; the error transaction must first be corrected









- Labeler Code ... Identifies the firm that owns the product
- Product Code ... Identifies the strength, dosage form, and formulation of the product
- Package Code ... Identifies the package size and type



For ARCOS reporting, NDCs must be converted to a 5-digit labeler code, 4-digit product code, and 2-digit package code

Leading zero must be added to the beginning of the section that falls short of the required number of digits



EXAMPLES: 12345 - 123 - 01 12345 - 0123 - 01

1234 - 1234 - 0101234 - 1234 - 01



EXAMPLES:

12345 - 1234 - 112345 - 1234 - 01



Notes regarding NDCs:

Generic" NDCs are available if product does not have its own NDC assigned; includes ARCOS reporting or import/export purposes



Notes regarding NDCs:

NDCs are unique to a specific product, including labeler, formulation, and package size



Notes regarding NDCs:

- PLEASE submit NDCs for addition; email or upload through the ARCOS Online system
- NDCs are not automatically added to our dictionary



Notes regarding NDCs:

Let us know if an NDC needs to be hidden from publication on our website; still available for use but not included in monthly text file version posted publicly





Use of this field is dependent upon what the NDC represents:

 NDC ends -** and represents bulk tablets, capsules, etc. → Quantity reports number of individual units (tablets, capsules, etc.)



Use of this field is dependent upon what the NDC represents:

 NDC ends -** and represents bulk raw material or bulk powder → Quantity is used in conjunction with Unit and Strength fields to report weight



- Use of this field is dependent upon what the NDC represents:
 - NDC ends -** and represents bulk liquid → Quantity is used in conjunction with Unit and Strength fields to report volume



- Use of this field is dependent upon what the NDC represents:
 - NDC ends -00 to -99 → Quantity is used to report number of packages; used in conjunction with Unit and Strength fields in limited circumstances





- Mandatory when reporting bulk powder, raw material, and liquid:
 - 1 → micrograms
 - 2 → milligrams 5 → milliliters
 - $3 \rightarrow$ grams $6 \rightarrow$ liters
 - $4 \rightarrow kilograms$





Optional to multiply quantity reported by 12 or 1,000:

- $D \rightarrow dozens (x 12)$
- K → thousands (x 1,000)

ASSOCIATE REGISTRATION



- In general, the registration of the entity on the other end of the transaction
 - When reporting a purchase or receipt (Code "P"), the Associate Registration is the supplier or sender
 - When reporting a sale or transfer (Code "S"), the Associate Registration is the recipient or customer

ASSOCIATE REGISTRATION



- Left blank when reporting manufacturing activities and inventory, along with Codes "7" (no activity) and "8" (no inventory)
- DEA field office registration used to be required for Code "Y" but is no longer needed





Required when reporting the transfer of C-I or C-II drugs

Number on pre-printed DEA Form 222 or CSOS order

ORDER FORM NUMBER



| DEA F | ORM-222 | | | U.S. OFFICIAL ORDER FORMS - SCHEDULES I & II DRUG ENFORCEMENT ADMINISTRATION | | | |
|---|--------------------|--------------------------|-----------------------------------|---|--------------------------------------|---|--|
| PURCHASER INFORMATION | | | REGISTRATION INFORMATI | ION | SUPPLIER DEA NUMBER:# | | |
| | | | REGISTRATION #: REGISTERED AS: | | PART 2: TO BE FILLED IN BY PURCHASER | | |
| | | | | | BUSINESS NAME STREET ADDRESS | | |
| | | | SCHEDULES: | | | | |
| | | | ORDER FORM NUMBER: | | | | |
| | | | DATE ISSUED: | DATE ISSUED: | | CITY, STATE, ZIP CODE | |
| PART 1: TO BE FILLED IN BY PURCHASER Print or Type Name and Title | | | | то | RT 5: BE D IN BY | PART 3: ALTERNATE SUPPLIER IDENTIFICATION - to be filled (name in part 2) if order is endorsed to another supplier to fill. ALTERNATE DEA # | |
| Print or | rype Name an | d little | | | HASER | Signature- by first supplier | |
| Signatur | re of Requestin | g Official (must be auth | orized to sign order form) Date | _ | | OFFICIAL AUTHORIZED TO EXECUTE ON BEHALF OF SUPPLIER DATE | |
| ITEM | NO. OF PACKAGES | PACKAGE SIZE | NAME OF ITEM | NUMBER REC'D | DATE REC'D | PART 4: TO BE FILLED IN BY SUPPLIER NUM NATIONAL DRUG CODE SHIT | |
| 1 | | | | | | | |

ORDER FORM NUMBER





CSOS Transaction Record

| Example Data | Field Name | Column Position |
|--------------|------------------------------------|-----------------|
| AA1234567 | Registrant DEA Registration Number | 1-9 |
| Р | Transaction Code | 10 |
| D | Action Indicator | 11 |
| 000543751** | NDC Number | 12-22 |
| 0000002 | Quantity | 23-30 |
| 4 | Unit | 31 |
| BB1234567 | Associate Registrant Number | 32-40 |
| 00X453890 | Order Form Number | 41-49 |
| 01312006 | Transaction Date (mmddyyyy) | 50-57 |
| 91070022 | Correction Number | 58-65 |
| 0985 | Strength | 66-69 |
| 000000088 | Transaction ID | 70-79 |
| | Leave Blank | 80 |
| 000543751** | NDC Number | 81-91 |
| 0000002 | Quantity | 92-99 |
| 4 | Unit | 100 |
| 0985 | Strength | 101-104 |
| | End of Line Carriage Return | 105 |

TRANSACTION DATE





- For purchases/receipt ("P"), the date on which possession is taken
- For sales/transfers ("S"), the date on which the drug product left your possession

TRANSACTION DATE



For manufacturing activities, the date will be the last day of the reporting period or year

For end-of-year inventory transactions ("3," "4," and "8"), the date will be the last day of the year



TRANSACTION DATE



For no-activity transactions (Code "7"), the date will be the last day of the reporting period

The Transaction Date must fall within the reporting period represented by the header record – unless an Action Indicator or Correction Number is used

CORRECTION NUMBER



Only needed if correcting error transactions in a text file submission; links corrected transaction to error transaction

- Must contact us to request this number
- ARCOS Online error correction does not require this number



STRENGTH FIELD





- Should only be used for one of two reasons:
 - Required to indicate purity of a bulk raw material, bulk powder, or bulk liquid
 - Reporting a partial (< 100%) or combined (> 100%) package; Quantity field must reflect 1 package

STRENGTH FIELD



Should NOT be used in any of the following situations:

- NDC represents bulk finished product (i.e., one capsule, one tablet, etc.)
- To reflect the strength of a tablet, capsule, etc.





NOTE: There is an implied decimal after the 3rd digit of the Strength

1000 = 100%0100 = 10%0010 = 1%0001 = 0.1%



TRANSACTION IDENTIFIER





 Each Transaction Identifier should only be used once per reporting period

If adjustments, deletions, or insertions are made, a Transaction Identifier may appear more than once in a submission

TRANSACTION IDENTIFIER



If adding a transaction to a prior reporting period, note what the next available Transaction Identifier should be

TRANSACTION IDENTIFIER



If using both ARCOS Online and EDI text file submissions, create the ARCOS Online report first







Reporting Formats

ELECTRONIC REPORTING



Electronic reporting is mandatory, per the SUPPORT Act (2018)

Accounts are now created upon creation of participant files for new ARCOS reportable registrations; no need to send separate requests

ARCOS ONLINE REPORTING SYSTEM



Notes regarding ARCOS Online:

- ✓ Web interface user friendly
- ✓ Transactions validated up front
- Account management; additional users
- ✓ Error corrections
- ✓ No formatting worries; "buttons"
- ✓ Text file upload feature released!

ARCOS ONLINE REPORTING SYSTEM



What is ARCOS and What Does it Do?

The Controlled Substances Act of 1970 (§ 827) created the requirement for Manufacturers and Distributors to report their controlled substances transactions to the Attorney General. The Attorney General delegates this authority to the Drug Enforcement Administration (DEA).

ARCOS is an automated, comprehensive drug reporting system which monitors the flow of DEA controlled substances from their point of manufacture through commercial distribution channels to point of sale or distribution at the dispensing/retail level – hospitals, retail pharmacies, practitioners, mid-level practitioners, and teaching institutions. Included in the list of controlled substance transactions tracked by ARCOS are the following: All Schedules I and II materials (manufacturers and distributors); Schedule III narcotic and gamma-hydroxybutyric acid (GHB) materials (manufacturers and distributors); and selected Schedule III and IV psychotropic drugs (manufacturers only).

ARCOS accumulates these transactions which are then summarized into reports which give investigators in Federal and state government agencies information which can then be used to identify the diversion of controlled substances into illicit channels of distribution. The information on drug distribution is used throughout the United States (U.S.). by U.S. Attorneys and DEA investigators to strengthen criminal cases in the courts.



ARCOS ONLINE REPORTING SYSTEM





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ARCOS/SORS Online Reporting: Login

| Login Information |
|---|
| User: |
| Password: |
| Login |
| SORS Registration (for Non-ARCOS Reporters) |
| Recover Account/Reset Password |


Please see the ARCOS/SORS User Manuals for information on new User Management features that have been added. These features allow creation of administator and dataonly users for ARCOS, SORS, and Retail Statistics. Additionally, you may specify access to only certain DEA Numbers for a user (for those accounts reporting for more than one DEA number).



"Enter ARCOS Reports"

✓ Create a new ARCOS report

- NOTE: You can enter transactions throughout the reporting period but cannot submit until the end of the period
- ✓ Adjust previously submitted reports

"Enter ARCOS Reports"

 NOTE: If you submit a text file report <u>by EDI upload</u>, transactions that successfully process will not appear in ARCOS Online; only error transactions will appear in an ARCOS Online report when they are corrected





"Enter ARCOS Reports"

| Diversion Control Dis | | E * DRUG ENFORCEMENT A | VISION | |
|---|--------------------|------------------------|---------------------------------------|----------------------|
| Welcome, #################################### | # [Logout | | ARCOS User Manual SORS User Manual | |
| | | | SORS User Manual | |
| * Back | | | | Help |
| Manage Reports | Participant Filter | | Edit: 🔽 | Correct: 🗾 Create: 👿 |
| ############ (REG | GISTRANT NAME) | DESCE | NDING | |
| | | | + | Create Report 5 🗸 |
| | (* 1997) * | ٥ | | |
| RA0223432 | Dec 2023 | Submitted | 🔺 Adjustments | View/Print |







"Enter ARCOS Corrections"

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| | i i i i i i i i i i i i i i i i i i i | Select User | |
| ############ Corrections W | aiting: 8375 | Correct Errors | |



"Enter ARCOS Corrections"

| | D |
|-----------------------|----|
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| Diversion Control Div | ~ |

U.S. Department of Justice \star Drug Enforcement Administration

DIVERSION CONTROL DIVISION

Welcome,

Logout

SORS User Manual

ARCOS User Manual

| ####### (REGISTRANT NAME) Back | | | | 😢 Help | |
|--------------------------------|-------------|----------|--------------------|--|--|
| | | | Error Transactions | | |
| Code/ID ≎ Select | NDC \$ | Qty ≎ | Date 🗘 | Error Text | Options |
| P 0000016056 | 55289095110 | 00000500 | 20100212 | Transaction code requires a valid associate registrant number.Order form number is required for schedule 1 and 2 drugs. | Correct Error Delete Transaction |
| P 0000016056 | 55289095110 | 00000500 | 20100212 | Transaction code requires a valid associate registrant number.Order form number is required for schedule 1 and 2 drugs. | Correct Error Delete Transaction |

"Enter New NDC Number"

 At any time, go into the ARCOS Online system and submit a new NDC for addition to the dictionary

- ✓ Supporting documentation is required
- Can also be done upon entering a transaction when an NDC is not found





"Enter New NDC Number"



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| Velcome, |
|----------|
|----------|

Logout

ARCOS User Manual SORS User Manual

| ARCOS/SORS Online: Add NDC Form | n |
|---|---|
| The DEA uses 11 digit NDC numbers, in the 5 Shorter forms should pad zeros to the LEFT. | -4-2 format (e.g. 12345-6789-01) |
| Examples of properly formatting an NDC: | |
| Original = 1234-0123-01 Original ARCOS = 01234-0123-01 ARCOS | = 12345-123-01 Original = 12345-0123-1 = 12345-0123-01 ARCOS = 12345-0123-01 |
| Upload Scanned Label Upload Help Important Information about Scanned Labels content Current File: File Not Uploaded, please Upload the file. | NDC Number |
| Choose Current File: File Not Uploaded, please | |



"Enter New NDC Number"

| Diversion Control Division | U.S. DEPARTMENT OF JUSTICE * DRUG ENFORCEMENT DIVERSION CONTROL D | |
|----------------------------|--|------------------------------------|
| Welcome, | Logout | ARCOS User Manual SORS User Manual |
| | | |

| ARCOS/SORS Online: Add/Edit Report | |
|---|--|
| Reporting Period: Mar 01 2024 - Mar 31 2024 | |

| Trans | Code Key (Enter '=' to set a f | field to the value f | rom the most recently e | ntered transa | ction, which, if present, is | s shown next) | | 1 |
|-----------|--------------------------------|----------------------|-------------------------|---------------|------------------------------|---------------|------------|---|
| r. ode | NDC Number | Quantity | Unit Code | Strength | Assoc. Reg. # | Order Form # | Trans Date | |
| ~ | 54321 -1234 -01 | | -Optional- | | -OR- | | | |

→ Submit New Transaction

Ø Cancel



"Manage Participant Data"

✓ Update central reporting point of contact

Update contact information for individual registrations



"Upload and Manage ARCOS Report Files"

- ✓ Real-time error checks for uploaded text files
- Report not processed until all errors resolved
- Uploaded transactions available in ARCOS Online system for future editing
- Step by step instructions available in Section 8 of ARCOS Online User Manual



"Upload and Manage ARCOS Report Files"

- Step by step instructions available in Section 8 of ARCOS Online User Manual
- 8.0 Upload and Manage ARCOS Report Files
- 8.1 Uploading ARCOS Files

ARCOS allows users to upload Report Files and manage any processing errors.

1. Click the **Upload and Manage ARCOS Report Files** selection found within the dropdown menu on the Main Menu Page. The ARCOS/SORS Reports Upload page will display.

| Select Report to Upload 🛛 😢 Help | Current File: File Not Uploaded, please Choose a file. | |
|----------------------------------|--|--|
| Choose | → Validate/Submit File | |

ARCOS/SORS Online: Pending/Processing Uploaded ARCOS Reports

Auto-Refresh Active
 Active
 Auto-Refresh Active
 Auto-Refresh
 Auto-Refr



"Lookup Retail Buyer Statistics"

- Research your customers before becoming their suppliers
- Feature requested by industry as a due diligence tool





"Lookup Retail Buyer Statistics"

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|------------------------|---|--|-------|-----------------------|-----|--|--|
| Diversion Contr me, | Logoul | | | | | OS User Manual S User Manual | |
| RCOS/SO | RS Online: I | Retail Buyer Statistics Lo | ookup | | | | |
| ug Code. | | umber and Drug Code to see t | | | Tin | e time span for lookup data is: ne Span Start: 04/01/2020 | |
| Drug Code | | NTP DEA Number: * | | | lin | ne Span End: 09/30/2020 | |
| Drug Code | | NTP DEA Number: * | | | | Selected Drugs | |
| Drug Code | | | | | Cod | Selected Drugs | |
| Drug Code | Selection | Available Drugs | | Clear Text | | Selected Drugs | |
| Drug Code | Selection | Available Drugs | | Clear Text Filters | | Selected Drugs | |
| Drug Code | Selection | Available Drugs Name | ^ | | Cod | Selected Drugs | |
| Drug Code | Selection Code 1100 | Available Drugs Name AMPHETAMINE | ^ | | Cod | Selected Drugs | |
| Drug Code | Selection Code 1100 1105 | Available Drugs Name AMPHETAMINE METHAMPHETAMINE | ^ | Filters | Cod | Selected Drugs | |
| | Selection Code 1100 1105 1205 | Available Drugs Name AMPHETAMINE METHAMPHETAMINE LISDEXAMFETAMINE | | Filters | Cod | Selected Drugs | |
| Drug Code | Selection Code 1100 1105 1205 1724 | Available Drugs Name AMPHETAMINE METHAMPHETAMINE LISDEXAMFETAMINE METHYLPHENIDATE | | Filters Add> | Cod | Selected Drugs | |



"Manage Users"

 The primary ARCOS point of contact has the ability to set up additional user profiles in the ARCOS Online system

 Only the primary user has the ability to log into the EDI upload portal to submit text file reports





"Manage Users"



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Welcome,

Logout

ARCOS User Manual SORS User Manual

Back

| | | : Manage Users | | | |
|---|-------------------------------------|----------------|----------|--------|-----------|
| | 10 💟 | (1 of 1) | art | | |
| Role 🗘 | Username 🗘 | Name 🗘 | Enabled? | | Action |
| ROLE_ARCOS_ADMIN | email@emailaddress.com | SMITH, JOHN | Yes | 🔺 Edit | Reset Pwd |
| ROLE_SORS_ADMIN ROLE_BUYER_STATS_ADMIN ROLE_ARCOS_ADMIN | emailaddress@email.com | COSE, R. | Yes | 🔺 Edit | Reset Pwd |
| ROLE_BUYER_STATS_ADMIN | ARCOSreporter@email.com | DOE, JOHN | Yes | 🔺 Edit | Reset Pwd |
| ROLE_ARCOS_ADMIN | Accurate_Reporting@emailaddress.com | BOOK, C. F. R. | Yes | 📕 Edit | Reset Pwd |
| ROLE_ARCOS_USER | imincompliance@email.com | DOH, JANE | Yes | 🔺 Edit | Reset Pwd |
| ROLE_BUYER_STATS | ARCOS_genius@company.com | COMPLIANCE, N. | Yes | 📕 Edit | Reset Pwd |



10 V (1 of 1)



"Manage Users"

| ROLE | USER CAN |
|------------------------|--|
| ROLE_BUYER_STATS | Utilize Buyer Statistics Tool |
| ROLE_BUYER_STATS_ADMIN | Utilize Buyer Statistics Tool |
| | Administer Users w/ ROLE_BUYER_STATS |
| | Administer Users w/ ROLE_BUYER_STATS_ADMIN |
| ROLE_SORS_USER | Enter SORS Data |
| ROLE_SORS_ADMIN | Enter SORS Data |
| | Administer Users w/ ROLE_SORS |
| | Administer Users w/ ROLE_SORS_ADMIN |
| ROLE_ARCOS_ADMIN | Enter ARCOS & SORS data; Utilize Buyer Statistics Tool |
| | Administer All Users |
| ROLE_ARCOS_USER | Enter ARCOS & SORS data; Utilize Buyer Statistics Tool |

Notes regarding text file uploading:

- ✓ Better for larger volume
- ✓ Automated uploads (allowed, not supported)
- With EDI, error notifications not received until after processing
- ✓ Importance of proper formatting
- ✓ Header record with at least one transaction record

Header (Control) Record

| FIELD | POSITION (TEXT FILE) | SAMPLE DATA |
|------------------------------|-----------------------------|-------------|
| REPORTING REGISTRANT | 1 - 9 | RS9999999 |
| ASTERISK | 10 | * |
| LAST DAY OF REPORTING PERIOD | 11 - 18 | 01312024 |
| REPORTING FREQUENCY | 19 | Μ |
| CENTRAL REPORTER | 20 - 28 | RA1234567 |

Header (Control) Record





Header Record + Transaction Record = ARCOS Report

RS9999999*01312024MRA1234567

RS9999999PI123450123**00000023BA8888888231234567011520248765432110000000000001









Delinquencies, Errors, and Common Issues





- Issues include, but are not limited to:
 - **X** Use of TAB key in spacing; check in MS Word
 - X Transactions extending beyond 80-character limit with additional spaces; template available
 - **X** Blank lines at the end of the report
 - X Switching back and forth between reporting registration numbers without a new header record



- Issues include, but are not limited to:
 - **X** Using dashes in formatting NDC
 - **X** Using decimal in Quantity entry
 - **X** Uploading a file type other than text
 - **X** Invalid or non-printable characters



- Issues include, but are not limited to:
 - X Incorrect zero fill in NDC entries
 - X Submission of NDCs not in the dictionary or not reportable
 - **X** Uploading a file type other than text
 - **X** Invalid or non-printable characters



Additional information regarding properly formatting text files is getting proper approval for distribution



YEAR-END INVENTORY CONFUSION



- Unless a substance becomes ARCOS reportable during the year and an "initial inventory" of that drug is required, the only inventory reported to ARCOS is end-of-year
- End-of-year inventory is separate from YERS (Quota) and should be included in the 4th quarter or December ARCOS submission





- Know what the NDC you are using represents ... for example:
 - Are you attempting to report a raw material by weight using a finished package NDC?
 - Are you using a finished package NDC to report individual units?
 - Does the product have both inner and outer package NDCs?



- Know what the NDC you are using represents ... for example:
 - Are you using an NDC you found on our website because it looks like it matches the product in your transaction?
 - > Is the drug ARCOS reportable?



Know what the NDC you are using represents ... for example:

Dosage form NDCs cannot be used to report weight of raw material and vice versa; contact us if a product does not have an NDC assigned

EXCLUDING ACTIVITIES



- Keep in mind that ARCOS is a ledger system of pluses and minuses, with the end-of-year inventory providing the starting point for the following year
- Make sure you are reporting both increases and decreases to inventory, whether a financial transaction is involved or not



EXCLUDING ACTIVITIES





- Don't forget to report your end-of-year inventory of ARCOS reportable controlled substances; report Code "8" if there was nothing reportable on hand
- Be sure to report Code "7" for any reporting period during which there was no ARCOS reportable activity (increases, decreases, or manufacturing)



- Error transactions represent data that could not be processed for a variety of reasons, and it is the responsibility of the reporter to correct these errors
- Complete and accurate reporting is required under the Controlled Substances Act (U.S.C. § 827(a))



Analysis of Uncorrected Error Transactions (submitted 1/1/2023 – 12/31/2024)

- 17,181 uncorrected error transactions
- 17,902 individual errors

| | | % TOTAL |
|-----------------------------|----------|---------|
| ISSUE | # ERRORS | ERRORS |
| Trans Date | 10,125 | 57% |
| NDC | 3,359 | 19% |
| Order Form | 1,164 | 7% |
| Unit | 758 | 4% |
| Strength | 726 | 4% |
| Associate | 709 | 4% |
| Quantity | 592 | 3% |
| Trans ID/Transaction Length | 462 | 3% |
| Trans Code | 7 | < 1% |

INCORRECT ASSOCIATE REGISTRATION





Make sure your supplier's or customer's DEA registration number has not changed; avoid accidentally reporting a transaction to or from a retired registration or a registration not authorized to handle a drug schedule

BOGUS ORDER FORM NUMBERS



Please do not make up 9-digit numbers to submit a C-I or C-II transaction

If you have questions regarding an order form number, please contact your local office for a solution


Send an email to ARCOS_Unit@dea.gov

- Use the "Manage Participant Data" feature in the ARCOS Online system
- ARCOS contact information is not automatically updated from other systems

UPDATING CONTACT INFORMATION





ARCOS point of contact should be the individual you want notified of submission problems, confirmations of submission, uncorrected errors, and any other ARCOS related correspondence for a specific registration



Conversion factors are built into NDCs

> For example:

NDC 63629-8526-01 OXYCODONE HCL 15MG TABLET; 100 TAB BOTTLE 0.015 GRAM x 0.8965 x 100 = 1.34475 GRAM OXYCODONE BASE

** You would just report the number of packages



Conversion factors are built into NDCs

> Another example:

NDC 82393-0123-** HYDROCODONE BITARTRATE; BULK 1 GRAM MATERIAL = 0.8965 GRAM BASE

** You would just report the weight of material



- Avoid resubmitting transactions that were already successfully processed
- If you need to add transactions to a reporting period, either submit <u>only</u> those transactions in another report for that period or insert them in a future report







Resources and Conclusion

IN THE WORKS



Updated ARCOS Registrant Handbook

> Text file formatting guidance

Converting Retail Summary Reports into Dashboards to assist in identifying trends nationwide





Online Version of NDC Dictionary (updated monthly; no "trade secret" entries)



What is ARCOS and What Does it Do?

The Controlled Substances Act of 1970 (§ 827) created the requirement for Manufacturers and Distributors to report their controlled substances transactions to the Attorney General. The Attorney General delegates this authority to the Drug Enforcement Administration (DEA).

ARCOS is an automated, comprehensive drug reporting system which monitors the flow of DEA controlled substances from their point of manufacture through commercial distribution channels to point of sale or distribution at the dispensing/retail level – hospitals, retail pharmacies, practitioners, mid-level practitioners, and teaching institutions. Included in the list of controlled substance transactions tracked by ARCOS are the following: All Schedules I and II materials (manufacturers and distributors); Schedule III narcotic and gamma-hydroxybutyric acid (GHB) materials (manufacturers and distributors); and selected Schedule III and IV psychotropic drugs (manufacturers only).

ARCOS accumulates these transactions which are then summarized into reports which give investigators in Federal and state government agencies information which can then be used to identify the diversion of controlled substances into illicit channels of distribution. The information on drug distribution is used throughout the United States (U.S.). by U.S. Attorneys and DEA investigators to strengthen criminal cases in the courts.



Resources

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- National Drug Code Dictionary (TEXT)
- Readme NDC Dictionary Instructions (TEXT)
- Retail Drug Summary Reports
- Automated Transaction Record Text File Format





Retail Summary Reports (updated every six months)



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Control & Transaction Record Text File Format





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Controlled Substance Schedules (published by Drug & Chemical Evaluation)









DailyMed; National Library of Medicine (https://dailymed.nlm.nih.gov/dailymed/)











Food & Drug Administration – Labeler Codes (https://www.fda.gov/industry/structured-productlabeling-resources/ndcnhric-labeler-codes)















Food & Drug Administration – NDC Directory (https://www.accessdata.fda.gov/scripts/cder/ndc/ index.cfm)







Enter at least three characters





ARCOS Input Team:

ARCOS_Unit@dea.gov

