

## Supply Chain Conference Orlando, Florida



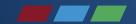
**April 1 – April 3, 2025** 

**DRUG ENFORCEMENT ADMINISTRATION** 



## Sam Weisman Data Systems Analyst









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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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#### **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 4<sup>th</sup> quarter/December report; due 15<sup>th</sup> 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







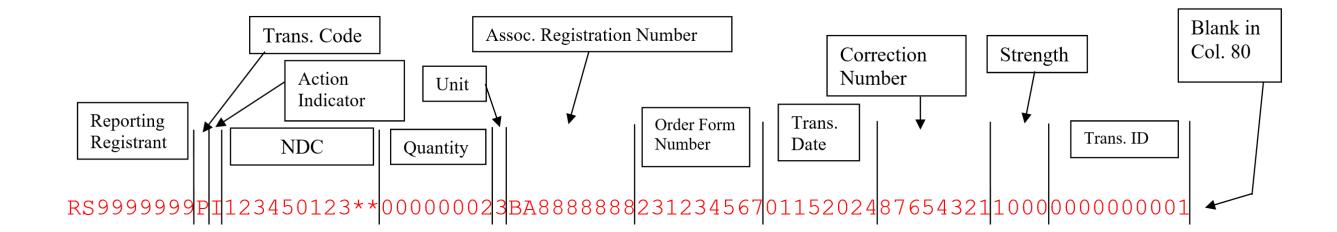


## Transaction Record

#### **TRANSACTION RECORD / 80-CHARACTER STRING**

FIELD	<b>POSITION (TEXT FILE)</b>	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 3<sup>rd</sup> 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

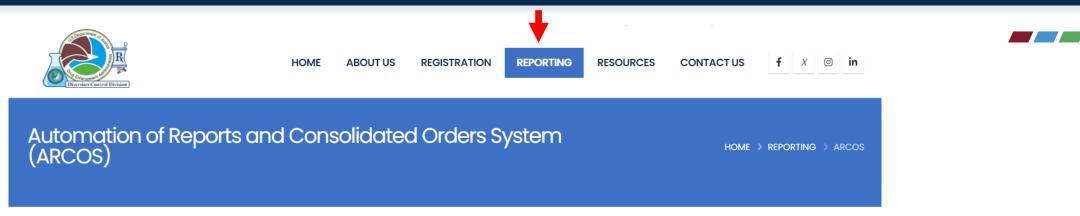
### **ARCOS ONLINE REPORTING SYSTEM**



# 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"

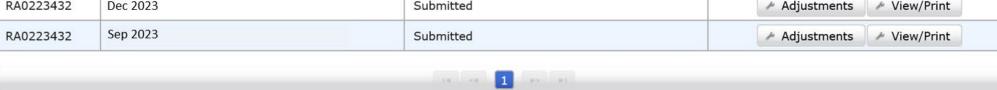
 NOTE: If you submit a text file report <u>by EDI upload</u>, transactions that successfully process will not appear in ARCOS Online; only error transactions will appear in an ARCOS Online report when they are corrected





### "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"

Diversion Control Division		IENT OF JUSTICE * DRUG ENFORCEN	
Welcome,   Lo	ogout		ARCOS User Manual SORS User Manual
* Back			
	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"

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	IX
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.	<ul> <li>Correct Error</li> <li>Delete</li> <li>Transaction</li> </ul>
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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DIVERSION CONTROL DIVISION

Velcome,
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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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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

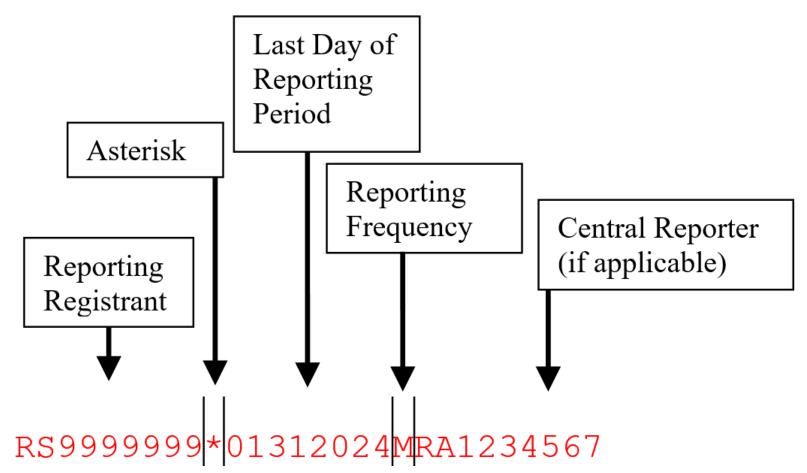
### Notes regarding text file uploading:

- ✓ 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	<b>POSITION (TEXT FILE)</b>	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

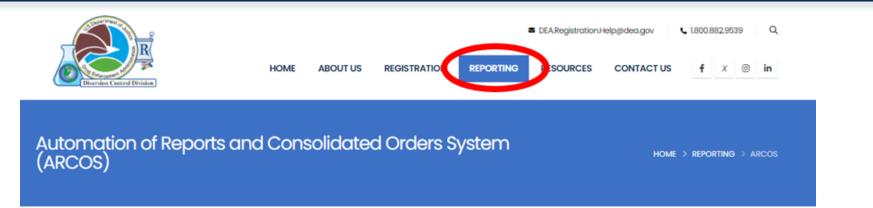
## > Text file formatting guidance

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

>

5

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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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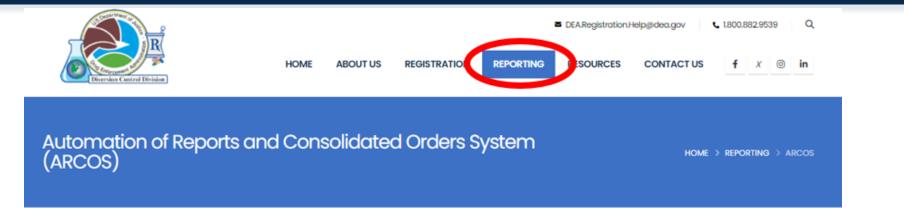






## Control & Transaction Record Text File Format





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#### Resources

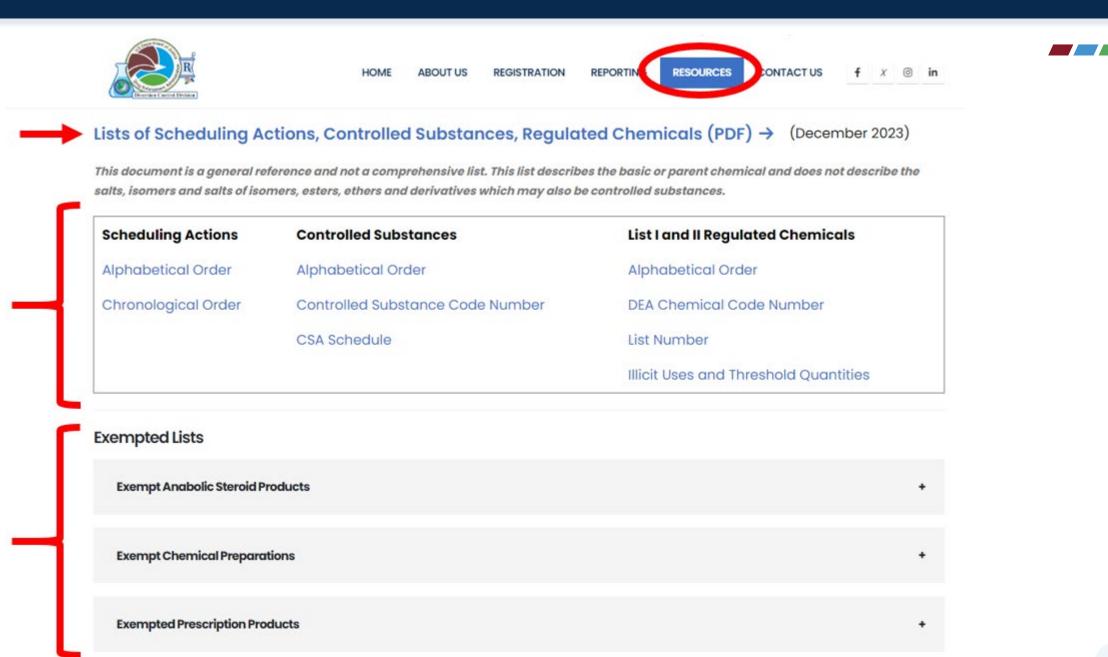
- National Drug Code Dictionary (TEXT)
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# Controlled Substance Schedules (published by Drug & Chemical Evaluation)





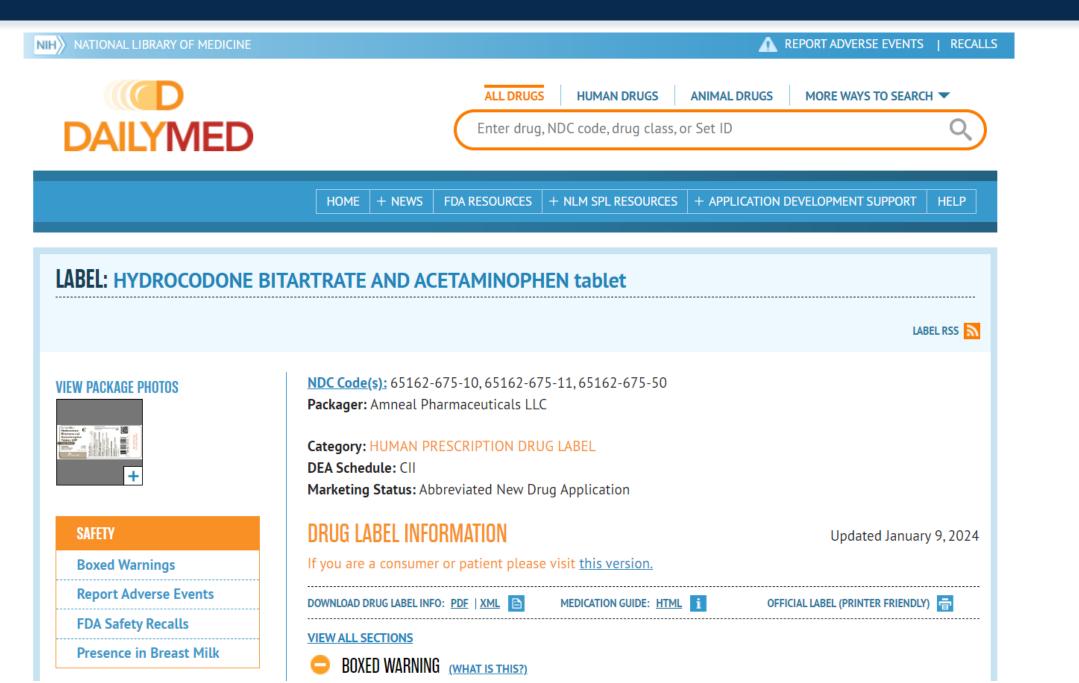




# DailyMed; National Library of Medicine (https://dailymed.nlm.nih.gov/dailymed/)











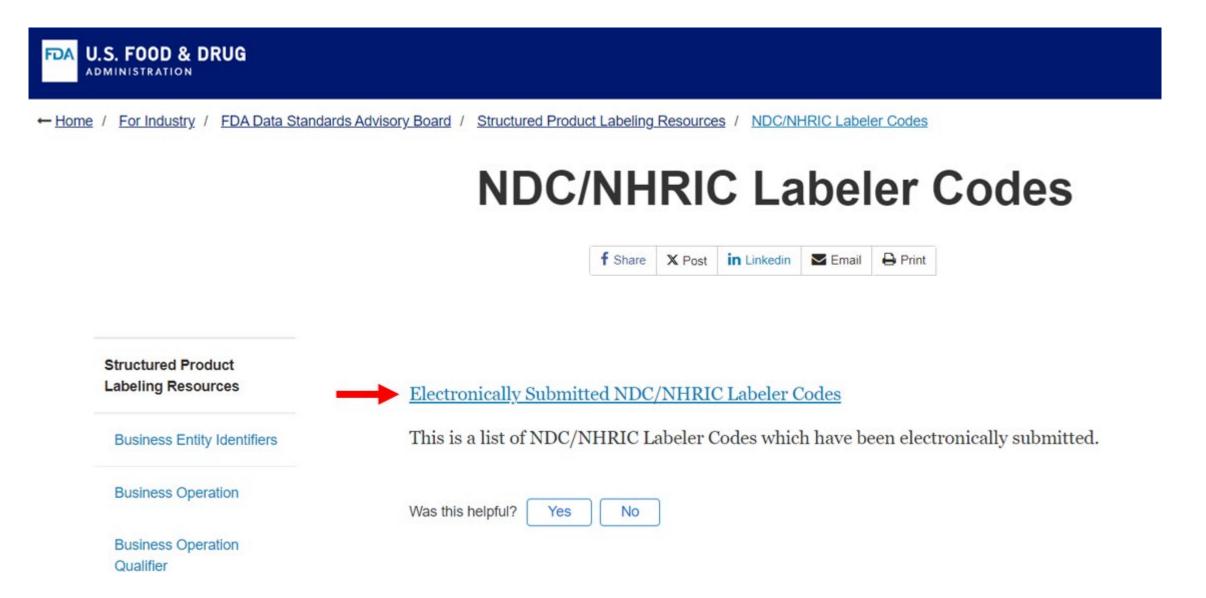
## Food & Drug Administration – Labeler Codes (https://www.fda.gov/industry/structured-productlabeling-resources/ndcnhric-labeler-codes)











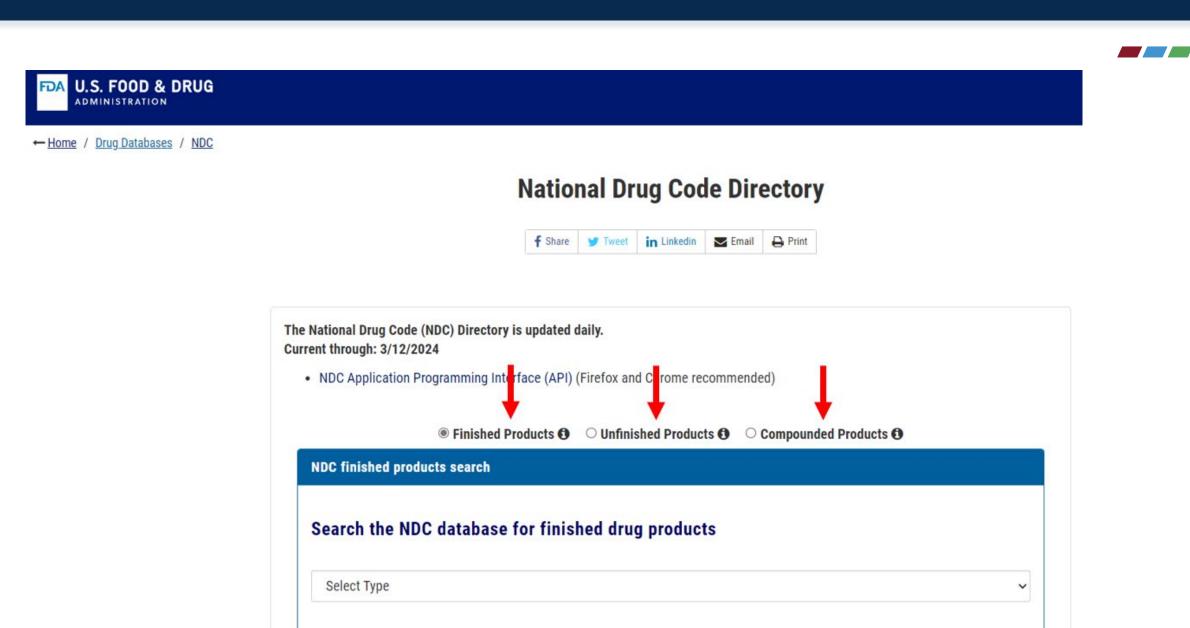




## Food & Drug Administration – NDC Directory (https://www.accessdata.fda.gov/scripts/cder/ndc/ index.cfm)







Enter at least three characters





# **ARCOS Input Team:**

ARCOS\_Unit@dea.gov

