

## DEA Suspicious Orders Report System (SORS) and Veterinary Practitioners

In October of 2019, the Federal Drug Enforcement Administration (DEA) Diversion Control Division launched the <u>Suspicious Orders Report System</u> (SORS) Online. SORS is a centralized reporting database for suspicious controlled substance orders. It is mandated by the federal Substance Use-Disorder Prevention that Promotes Opioid Recovery and Treatment for Patients and Communities (SUPPORT) Act. The Support act requires SORS registration, workplace policy, and reporting by veterinarians.

The Support Act applies to veterinarians since they are registered with the DEA under the "Practitioner" classification category. As registrant practitioners, veterinarians are authorized to transfer controlled substances to one another. It is during these transfers that the SUPPORT Act identifies the potential for suspicious controlled substance orders. If a veterinarian receives a suspicious order from another registrant, he or she is mandated to report it to SORS.

The SUPPORT Act states the term "suspicious order" may include, but is not limited to: an order of a controlled substance of unusual size; an order of a controlled substance deviating substantially from a normal pattern, and; orders of controlled substances of unusual frequency as per 21 U.S.C. 802(57) and 21 C.F.R. 1301.74(b).

Veterinarian DEA registrants are required to develop and implement plan and procedures to identify report suspicious. The plan and procedures should be in writing and could be requested during an inspection. The DEA has not provided a specific plan template to assist practitioners with compliance. However, it is inferred that the plan and procedures should address the process to evaluate orders and determine if they are or could potentially be "suspicious orders" as defined above.

If a veterinarian has concerns about a potential suspicious order, he or she must report it to SORS. In order to file a report, veterinarians must register for an online account. <u>Veterinarian</u> <u>DEA registrants are REQUIRED by law to register with SORS, regardless of whether or not a</u> <u>report is ever filed.</u>

The registration process is as follows:

- 1. Go to <a href="https://apps2.deadiversion.usdoj.gov/arcos-online">https://apps2.deadiversion.usdoj.gov/arcos-online</a> and click on "SORS Registration (for Non-ARCOS Reporters)" hyperlink.
- 2. After completing the initial registration, a confirmation e-mail will be sent to the e-mail address provided.

- 3. Once the DEA approves the registration, another e-mail will be sent with a temporary password.
- 4. Go to <u>https://apps2.deadiversion.usdoj.gov/arcos-online</u> and type in your username and the temporary password. The system will require you to change the temporary password.
- 5. Upon successfully changing the password, the account will be fully registered to report to the SORS Online system.

A helpful resource from the American Veterinary Medical Association (AVMA) with more information about veterinarians and SORS may be accessed <u>here.</u>