VERITAS RESOURCE SERIES
VC-RS-002
RESOURCE SERIES

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SCHEDULE II ORDERING SELF-ASSESSMENT CHECKLIST

DEA FORM 222 & CSOS

This checklist is designed to help DEA registrants evaluate internal controls related to the ordering, receipt, and recordkeeping of Schedule II controlled substances. It includes considerations for both paper DEA Forms 222 and the Controlled Substance Ordering System (CSOS).

INSTRUCTIONS: Review each item and check the box if the practice is in place. If an item does not apply to your organization, mark N/A. Use the Inspection Insights to understand why each area is important.

1. AUTHORIZED ORDERING

YES	N/A	ITEM	INSPECTION INSIGHT
		Individuals authorized to order Schedule II controlled substances have been identified.	Strong ordering controls begin with clearly defined authorization. Accountability starts before an order is ever submitted.
		Ordering responsibilities are clearly defined.	
		Ordering authority is reviewed periodically.	
		Procedures exist to remove ordering authority when personnel changes occur.	
		Staff understand their responsibilities for Schedule II ordering.	

2. DEA FORM 222

YES	N/A	ITEM	INSPECTION INSIGHT
		Blank DEA Forms 222 are secured against unauthorized access.	Paper Forms 222 must be secured and accounted for. Missing or improperly maintained forms are a common inspection finding.
		Access is limited to authorized personnel.	
		Executed forms are organized and readily retrievable.	
		Procedures exist for documenting lost or stolen forms.	
		Staff understand when paper Forms 222 are used.	

3. CONTROLLED SUBSTANCE ORDERING SYSTEM (CSOS)

YES	N/A	ITEM	INSPECTION INSIGHT
		CSOS certificates are assigned only to authorized individuals.	During an inspection, the ability to promptly retrieve ordering records is often just as important as maintaining the records themselves.
		Certificate expiration dates are periodically reviewed.	
		Access credentials are protected from unauthorized use.	
		Procedures address certificate renewal.	
		Completed CSOS order records are retained.	
		Completed CSOS transaction records can be readily retrieved.	
		CSOS documentation is associated with the corresponding receiving records.	
		Management periodically reviews CSOS ordering activity.	

4. RECEIPT VERIFICATION

YES	N/A	ITEM	INSPECTION INSIGHT
		Schedule II shipments are received by author- ized personnel.	Verification at receipt is critical for maintaining accountability and identifying discrepanices early.
		Quantities received are verified against the order.	
		Discrepancies are documented and investigated.	
		Receipt documentation is maintained.	
		Ordering and receiving records can be linked.	

FOLLOW-UP ACTIONS / NOTES

Use this space to document identified gaps, responsible personnel, or items requiring further review.

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DEA FORM 222 & CSOS

5. RECORDKEEPING

YES	N/A	ITEM	INSPECTION INSIGHT
		Ordering records are organized.	Good recordkeeping is not just about retention; it's about being able to produce records quickly and completely.
		Records are readily retrievable.	
		Documentation supports accountability from order through receipt.	
		Internal filing practices are periodically reviewed.	

6. INTERNAL CONTROLS & OVERSIGHT

YES	N/A	ITEM	INSPECTION INSIGHT
		Written procedures address Schedule II ordering.	Ongoing oversight and periodic review help identify issues before they become compliance problems.
		Employees receive periodic training.	
		Self-audits are conducted.	
		Management reviews ordering practices.	
		Corrective actions are documented when appropriate.	

POTENTIAL AREAS FOR IMPROVEMENT

* Unclear ordering authority
* Incomplete DEA Form 222 records
* Difficulty retrieving CSOS records
* Missing receiving documentation
* Poor record organization
* Lack of documented procedures
* Limited employee training
* Inadequate oversight
* Unaddressed discrepancies

FINAL REVIEW—KEY QUESTIONS

*Can your organization promptly retrieve ordering records upon request?
* Do current procedures support accountability throughout the ordering and receiving process?
* Have potential gaps been identified and addressed?

READY FOR A COMPREHENSIVE COMPLIANCE REVIEW?

This self-assessment is intended to help organizations identify potential areas for improvement, but it is not a substitute for a comprehensive compliance review. If your organization would benefit from an independent assessment of its controlled substance policies, procedures, or recordkeeping practices, **Veritas Compliance & Analytics** provides customized compliance assessments, mock DEA inspections, policy reviews, and staff training for DEA registrants nationwide.

ABOUT THE VC-RS SERIES

The Veritas Compliance & Analytics Resource Series provides practical educational tools to help DEA registrants evaluate common compliance considerations. These resources are intended to promote awareness and should not be relied upon as a comprehensive compliance assessment.

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