Verification Router Service (VRS) Provider Network

STATEMENT ON ALLOW OR BLOCK LIST CAPABILITY

The VRS Provider Network (PN) recognizes that some VRS service providers offer or may want to offer an Allow or Block list option for their VRS customers. While some VRS providers are open to offering this capability, it is an optional service and is not an established requirement for participation in the VRS.

The VRS PN has developed this document to aid VRS service providers and their customers in developing and using an Allow or Block List, should they choose to explore this option.

Definitions

Allow List: The responding customer (manufacturer or repackager) will only respond to a verification request from a Global Location Number (GLN) on the Allow List, which that responding customer populates.

Block List: The responding customer (manufacturer or repackager) will not respond to a verification request from a GLN on the Block List, which that responding customer populates.

The parameters for using an Allow or Block List are defined and controlled by the VRS provider and its individual responding customer. Responding customers will maintain the Allow or Block Lists within their individual VRS systems and will not be shared with other providers within the network.

It is the view of the providers in the VRS PN that using an Allow List can be very burdensome to operationalize and may significantly undermine the efficiencies of using the VRS for product identifier verification. The shortcomings of an Allow List include:

- Even with constant updating to capture all allowable GLNs, it will likely never be comprehensive and current enough to include all acceptable requestors, resulting in unsuccessful verifications.
- It does not prevent a bad actor from impersonating an entity on the Allow List by using that entity's GLN.
- The DSCSA requires that manufacturers and repackagers respond within 24 hours/one business day to verification requests from authorized trading partners in possession or control of the product. If the requestor is not on the Allow List, using an Allow List may delay or impede a manufacturer or repackager's ability to meet this requirement.
- The ambiguity of the feedback received by a requestor not on the Allow List delays remediation of the cause of the unsuccessful verification.