

September 28, 2026

FILED BY ELECTRONIC SUBMISSION

Heather Achbach
Regulatory Drafting and Policy Support Section
Drug Enforcement Administration
8701 Morrisette Drive,
Springfield, Virginia 22152

DEA.PRA@dea.gov

Re: Agency Information Collection Activities; Proposed eCollection, eComments Requested; Proposed New Collection Request; Title-Suspicious Orders of Controlled Substances, OMB Number 1117-0056

Dear Heather Achbach,

On behalf of the Healthcare Distribution Alliance (HDA), we appreciate the opportunity to comment on the Drug Enforcement Administration's (DEA) Paperwork Reduction Act (PRA) notice regarding the proposed information collection for suspicious orders of controlled substances. HDA represents primary pharmaceutical distributors — the vital link between the nation's pharmaceutical manufacturers and pharmacies, hospitals, long-term care facilities, clinics and others nationwide. Since 1876, HDA has helped members navigate regulations and innovations to get the right medicines to the right patients at the right time, safely and efficiently.

While HDA members appreciate the utility of the Suspicious Order Report System (SORS Online) platform, we believe that DEA's estimated industry burden and the assumptions underlying those estimates understate the personnel and resources necessary to support suspicious order monitoring and reporting.

Registrants dedicate teams of employees to identifying, analyzing, reviewing, and reporting suspicious orders, as well as to maintaining the broader compliance programs necessary to support these activities. For some HDA members, these functions involve multiple dedicated team members, and larger organizations may employ substantially more personnel across their suspicious order monitoring and related compliance operations, in addition to utilizing external consultants and resources to supplement their internal teams.

HDA members also incur considerable costs associated with third-party vendors supporting the ongoing operation of suspicious order monitoring programs, as well as information technology and system costs associated with enterprise resource planning (ERP) and other platforms used to support that monitoring and reporting. Thus, HDA encourages DEA to reconsider its estimates of \$0 in additional annual costs associated with the information collection. HDA also respectfully requests that DEA provide additional detail regarding the methodology and assumptions used to derive its estimates, which would help assist registrants in evaluating DEA's estimates and providing more informed feedback on the resources associated with the information collection.

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HDA's comments regarding DEA's burden estimates should not be interpreted as questioning the utility of the current reporting framework. HDA members recognize that the centralized, automated reporting structure in place today represents a meaningful improvement over prior methods of suspicious order reporting, and HDA appreciates DEA's efforts to develop and implement a more consistent and efficient reporting process through SORS Online.

HDA appreciates DEA's consideration of these comments and looks forward to continuing to work with DEA on issues affecting pharmaceutical distributors and the safe and secure distribution of controlled substances.

If you have any questions, please contact Kala Shankle, Vice President of Regulatory Affairs at kshankle@hda.org.

Sincerely,

/s/ Kala Shankle

Vice President, Regulatory Affairs