

# DSCSA Readiness Checklist

## For independent & community pharmacies — the November 27, 2026 deadline

*The items an FDA investigator or board inspector will ask about. Check what you can prove today — not what a portal promises.*

### 1 • Receiving trace data

- ☐ **You receive an EPCIS file for every serialized shipment you purchase**  
Not an invoice, not a packing slip — the serialized EPCIS transaction data (TI/TS).
- ☐ **Secondary and backup suppliers deliver EPCIS data too**  
Your primary's portal only shows its own shipments. Every source counts.
- ☐ **Missing files are detected within days, not at audit time**  
A gap you find in November is a finding; a gap you catch this week is a fix.

### 2 • Verifying trading partners

- ☐ **Every supplier is verified as an authorized trading partner**  
State-licensed or federally registered — and you can show how you checked.
- ☐ **The sender on each EPCIS document matches an authorized partner**  
The document's sender identity (GLN) is checked, not assumed from the invoice.
- ☐ **Suspect or unverifiable product gets quarantined, and it's documented**  
A written response process for suspect product is itself a DSCSA requirement.

### 3 • Records & audit response

- ☐ **Six years of transaction records are in YOUR custody**  
Wholesaler portals display data; the retention duty is the dispenser's.
- ☐ **Records survive a switch of wholesaler, PMS, or portal account**  
Closing an account must not take your compliance history with it.
- ☐ **You can produce records for a product or lot within 48 hours**  
Trace requests have statutory clocks. Days of scrambling is the failure mode.
- ☐ **Someone owns DSCSA at your pharmacy — by name**  
An owner, a process, and a place records live. Inspectors ask who, not what.

## Anything unchecked is a finding waiting to happen.

MedTrak closes every item on this page automatically — \$99/mo founding rate, setup waived through Nov 27, 2026, audit-ready in 60 days or we keep working free. No change to your pharmacy software.

**Book a 15-minute walkthrough:** [info@pharmasyssolutions.com](mailto:info@pharmasyssolutions.com) · 909-206-4504 · [pharmasysmedtrak.com](https://pharmasysmedtrak.com)

This checklist is educational and not legal advice. PharmaSys MedTrak is a compliance workflow and recordkeeping tool; it does not replace the pharmacy's responsibility to comply with DSCSA and does not independently certify trading-partner compliance.