

Myths

Don't make your compliance decisions based on myths

My wholesaler takes care of DSCSA compliance for me.

Wholesalers have different requirements than dispensers. Its important for pharmacies to work closely with their wholesaler, but don't rely on them for your DSCSA compliance. Your pharmacy license & pharmacist license is on the line.

The wholesaler may be able to store the data for your pharmacy, but they don't cover the other requirements of the law. Also, if you use more than 1 wholesaler you will have to log in to each portal to retrieve your data.

- Verification - At time of purchase that the trading partner has a valid state license.
- Quality Inspection & Reporting – inspect each product and reconcile it with the transaction data
- Suspect Product – written policy & procedure, investigate & report

My wholesaler keeps my records. I have the invoices for my orders

We don't receive Suspect Product.

Here are a few items that DSCSA considers suspect and must be investigated before the product can be dispensed to patients. The pharmacy has 3 days to resolve any errors.

- Missing product
- Duplicate data
- Extra product
- Missing data

DSCSA does not allow borrowing/lending of product. When product is exchanged the receiver takes possession of the product. This means that the transaction information, transaction statement, and transaction history must follow the product.

We borrow and lend with other pharmacies.

We have a Policy & Procedures manual for the pharmacy.

DSCSA requires a specific written policy documenting the pharmacy procedures for handling Suspect Product – investigating, quarantining, and reporting.