

CDSA Drug Record Keeping Requirements

This document is prepared by www.pharmasist.ca

1. Core Requirement

Pharmacists must maintain current paper or electronic records for purchases and sales of all drugs listed under the Controlled Drugs and Substances Act schedules. Records must be kept on pharmacy premises and be available for inspection when requested by authorized federal or provincial representatives.

Main Objectives

- Control receipt, storage, security, and distribution.
- Reduce diversion and improper use.
- Improve substandard record practices.
- Support Prescription Review Program goals.

Applicable Framework

- Controlled Drugs and Substances Act.
- Narcotic Control Regulations.
- Food and Drug Regulations, Part G.
- Benzodiazepines and Other Targeted Substances Regulations.

2. Prescription Filing Requirements

- File CDSA prescriptions separately.
- File in sequence by date and prescription number.
- Electronic filing is acceptable if exact copies can be printed.
- Label paper files with date range and prescription number sequence.
- Include low-dose exempted codeine prescriptions in CDSA files.
- Keep records readily accessible for two years from last fill.
- Make files available for audit or inspection.
- Maintain clear and retrievable records.

Sales Reports

- Maintain manual or computer-generated sales reports.
- Ensure all reportable CDSA drugs are captured.
- Keep reports readily retrievable.
- Pharmacy manager should review reports regularly.

Receipt Records

- Keep invoices or purchase reports.
- File by date and invoice number.
- Use product received date, not invoice date.
- Include strength and quantity received.

3. Dispensing Details and Audit Trail

For CDSA part-fills, controlled drug repeats, or benzodiazepine repeats, create a cross-referenced audit trail. Each fill should have a new prescription/transaction number, current date, pharmacist initials, and clear reference to the original prescription. Clearly mark records as **part-fill** or **refill**.

4. Inventory Counts and Reconciliation

- Conduct complete physical counts at least quarterly.
- Count more often for high-volume products.
- Compare physical count with computer perpetual balance.
- Review drug history reports.
- Review purchases and sales.
- Review inventory adjustments.
- Review emergency purchases and supplies.
- Check outdated stock for return or destruction.

Perpetual Balance

A perpetual balance record is recommended so the pharmacy is aware of on-hand quantities at all times. Computer balances should be checked against physical inventory counts.

Loss, Theft, or Forgery

Report any loss, theft, or forgery directly to Health Canada's Office of Controlled Substances within **10 days** of discovery. Keep the original report at the pharmacy.

5. Additional Controls

- Verify practitioner signature if unknown.
- Document returns to wholesaler.
- Document emergency supplies to another pharmacist.
- Retain supporting documentation in the prescription file.
- Report sales when required.
- Keep records inspection-ready.