FAWKS NEWS

DSCSA

Drug Supply Chain Security Act

Small Dispenser

A dispensing business whose owning corporate entity has 25 or fewer full-time employees licensed as pharmacists or qualified as pharmacy technicians.



FAWKS Call to Action!

1) **For your upstream medication partner(s) - Familiarize yourself with the location of the DSCSA records.**

2) **If you don't have a GLN number yet... you will need one (HERE)**

DSCSA: What Does This Mean for Your ASC?

Small Dispenser Exemption - You qualify!

One small and unlikely caveat: Eligibility is based on the corporate entity that owns the ASC, not simply the individual facility. For qualifying small dispensers, the FDA currently allows continued use of existing methods through November 27, 2027.

What Does Your ASC Actually Need to Do?

1. Know where your wholesaler's DSCSA transaction records are stored.
2. Confirm you can access and retrieve those records.
3. Ensure DSCSA records are maintained for the required six years.
4. Maintain a process for identifying, quarantining, and reporting suspect or illegitimate medications.

What Happens After November 27, 2027?

Don't overthink this. For every ASCs that purchases through legitimate wholesalers… Nothing

This does not mean replacing paper medication logs, changing cabinet stocking procedures, or electronically tracking every dose administered.

DSCSA is concerned with tracing prescription drug packages through the supply chain, not tracking every medication movement inside your ASC.

ASCA statement: https://www.ascassociation.org/asca/asc-operations/drugs-devices/dscsa