



DSCSA checklist for Medical Spas.



Applicability checklist: Are you a 'Dispenser' under DSCSA?

Under the FDA's Drug Supply Chain Security Act (DSCSA), if your Medical Spa buys prescription products directly from a supplier and takes physical ownership before administering them to a patient, you are legally considered a "dispenser" and must follow pharmaceutical supply chain rules.

- | | | |
|--------------------------|--------------------------|---|
| Y | N | |
| <input type="checkbox"/> | <input type="checkbox"/> | Do you dispense or administer prescription drug products (like neurotoxins or fillers)? |
| <input type="checkbox"/> | <input type="checkbox"/> | Do you purchase these products directly from a wholesaler or manufacturer? |
| <input type="checkbox"/> | <input type="checkbox"/> | Do you take physical ownership and store these products onsite before patient use? |
| <input type="checkbox"/> | <input type="checkbox"/> | Do you store the product onsite (even for a day) before administering it? |

If you answered 'Yes' to all of these questions your Medical Spa has DSCSA obligations.

Compliance risk scoring checklist: Are you DSCSA compliant?

1. Product Traceability

- | | | |
|--------------------------|--------------------------|--|
| Y | N | |
| <input type="checkbox"/> | <input type="checkbox"/> | Can you receive and store electronic transaction data (EPCIS)?
(EPCIS is the secure digital file format used to track a drug's history. You can no longer rely on paper packing slips or PDF invoices.) |
| <input type="checkbox"/> | <input type="checkbox"/> | Can you retrieve a product's transaction history within 48 hours if requested by an auditor? |
| <input type="checkbox"/> | <input type="checkbox"/> | Do you securely maintain all electronic transaction records for at least 6 years? |
| <input type="checkbox"/> | <input type="checkbox"/> | Can your system send transaction information electronically if you transfer products to another Medical Spa location or legal entity? |
| <input type="checkbox"/> | <input type="checkbox"/> | Are your traceability records tied directly to the specific serial numbers of the products in your refrigerator or supply closet? |

2. Product Verification

- | | | |
|--------------------------|--------------------------|--|
| Y | N | |
| <input type="checkbox"/> | <input type="checkbox"/> | Can you electronically verify the unique 2D barcode (product identifier) on the packaging to ensure the drug is authentic? |
| <input type="checkbox"/> | <input type="checkbox"/> | Do you have a clear, documented process for handling "suspect" products (e.g., items that look altered, fake, or have missing barcodes)? |
| <input type="checkbox"/> | <input type="checkbox"/> | Do you have a secure electronic and physical quarantine procedure for products under investigation? |
| <input type="checkbox"/> | <input type="checkbox"/> | Can you quickly respond to verification requests from your trading partners or the FDA if a product you purchased is flagged? |
| <input type="checkbox"/> | <input type="checkbox"/> | Can you verify the authenticity of a returned product before safely placing it back into your active inventory? |

3. Authorized Trading Partners (ATP)

- | | | |
|--------------------------|--------------------------|--|
| Y | N | |
| <input type="checkbox"/> | <input type="checkbox"/> | Do you actively verify that all your suppliers (wholesalers or manufacturers) are legally authorized and FDA-registered? |
| <input type="checkbox"/> | <input type="checkbox"/> | Do you maintain digital or written documentation proving you checked your suppliers' authorized status? |
| <input type="checkbox"/> | <input type="checkbox"/> | Do you have a process to regularly re-check supplier licenses to ensure they haven't expired or been revoked? |
| <input type="checkbox"/> | <input type="checkbox"/> | Do you only purchase prescription products from businesses that are capable of providing electronic DSCSA data? |
| <input type="checkbox"/> | <input type="checkbox"/> | Is your Medical Spa's license up to date so suppliers can verify your authorization to purchase? |

4. Electronic Interoperability

- Y N
- Can your current compliance system safely exchange data electronically with all of your different suppliers?
- Is your compliance solution "interoperable," meaning it communicates seamlessly with your suppliers' systems without manual file uploads?
- Are you free from the burden of manually typing in serial numbers or copy-pasting tracking data from a wholesaler web portal into a spreadsheet?
- Does your system automatically alert you if the electronic data is missing when a physical shipment arrives at your clinic?
- Can your system adapt to changes in your suppliers' data formats without losing your historical compliance records?
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5. Internal Readiness

- Y N
- Do you have written Standard Operating Procedures (SOPs) detailing how staff must receive and log prescription shipments?
- Are your front-desk and clinical staff fully trained on how to spot and handle suspect or damaged products?
- Have you successfully tested your workflows for scanning or intaking serialized products when the delivery box arrives?
- Is there a designated staff member responsible for ensuring daily DSCSA compliance and managing system alerts?
- Do you have a backup plan for receiving products if your internet or software goes down temporarily?
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6. Deadline Awareness

- Y N
- Are you prepared for the final FDA Dispenser Enforcement Deadline: November 2026?
- Do you have a documented implementation timeline to select and launch a compliance solution well before the deadline?
- Have you communicated the upcoming November 2026 deadline to your key suppliers and internal staff?
- Have you budgeted for the necessary software required to meet these federal mandates?
- Will your compliance system be fully tested and operational by October 2026 at the latest to allow a 30-day buffer?
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Compliance risk scoring Summary

Tally up your 'No' answers to assess your Medical Spa's current regulatory risk:

- **0 'No' Answers = No Risk.** You are in a strong position. Maintain your current systems and ensure your SOPs are up to date.
Important: Even if you have 1 'No' answer, you are not fully DSCSA Compliant.
- **1–6 'No' Answers = Moderate Risk.** You have gaps in your compliance strategy. You likely rely too heavily on manual processes or wholesaler portals, leaving you vulnerable to audit failures.
- **7+ 'No' Answers = High Risk / Immediate Action Required.** Your Medical Spa is currently operating outside of FDA supply chain requirements. You must immediately adopt an electronic DSCSA solution to secure your inventory and protect your license before the November 2026 enforcement deadline.

Ready to turn your 'No' answers into 'Yes'?

Compliance doesn't have to be complicated. LSPedia's Pharmacy Pro is an automated, easy-to-use DSCSA solution designed specifically for clinical dispensers like Medical Spas. We handle the technical data so you can focus on patient care. Book a demo today.

Disclaimer: This checklist is for educational and self-assessment purposes only and does not constitute legal advice. Please consult with a compliance professional regarding your specific regulatory obligations.