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ADVISORY

TO: Medication Administration Program Administrators and Registered Sites

FROM: David E. Johnson, Director, Drug Control Program (DCP)

DATE: March 29, 2023

SUBJECT: Retention Period for MAP Program Records

105 CMR 700.006(B) states that all Massachusetts Controlled Substances Registration (MCSR) registrants shall retain for at least two years records that the regulation requires to be created or maintained. As applied to MAP Registered sites, this requirement-applies to records that MAP Registered sites are required to keep by 105 CMR 700.000: *Implementation of M.G.L. c. 94C*, particularly 105 CMR 700.003(E), the MAP Policy Manual, and associated Departmental Advisories.

The two-year retention period is timed from the date of the record.

- For a stand-alone record such as a Medication Transfer Form or Leave of Absence Form, the “date of the record” appears on the face of the record. It is the date when the form was created/issued.
- Where a record is a collection of multiple entries, such as the *Countable Controlled Substance Book (Count Book)* or the Medication Administration Record (MAR), the “date of the record” is the date of the last entry in the record. For the *Count Book* this would be the date of the final entry in the book before it was retired. For a MAR, it would be the date of the last medication administration recorded on the MAR sheet.

Two years’ worth of relevant MAP documentation must be made available to any government inspector/investigator upon request. MAP Registered sites may choose, for their own operational or legal reasons, to retain MAP records for a longer period, but they are not required to do so by the Drug Control Program (DCP).

Questions regarding this Advisory may be presented to DCP electronically at dcp.dph@mass.gov.