

Records Checklist - For CDPH Licensees

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Resource Type	Record-keeping requirements checklist
Licensee Type	California Department of Public Health Licensees (Cannabis Manufacturers)
About this Resource	You are required per CDPH regulation to keep certain records. Use this document as a checklist. The regs are linked below; go through this checklist, referencing the regs as needed. Your records may be organized by different categories or labels. That's ok, as long as you know where things are.
Disclaimer	The information contained in this checklist is for general, informational purposes only. It is not legal advice, individual advice specific to your situation, or any other kind of advice. For personalized guidance, call your favorite cannabis consultant or attorney.
Source	"CDPH Regs" California Code of Regulations, Title 17, Division 1, Chapter 13
General Information	Maintain records on the premises at all times. Make the documents available to CDPH upon request.
	CDPH and its inspectors or agents shall have access at reasonable times to the manufacturing premises, any area in which the licensee is conducting manufacturing activities, storage areas, records, production processes, labeling and packaging processes, and conveyances used in the manufacture, storage or transportation of cannabis products so that it may determine compliance.
	CDPH may copy any materials, books, or records of any licensee or their agents pertaining to the commercial cannabis business.
	Secure and back up electronic records in a manner that prevents unauthorized access and that ensures the integrity of the records is maintained.
	At a minimum, maintain all documents in English (other languages optional, as needed by the licensee).
	Keep records for seven years (unless otherwise specified).
	Keep and clearly mark outdated SOPs so onsite employees won't mistakenly access outdated information.
	Records shall be legible.
LINKS	--> Take me to the CDPH Regulations <--
	--> Take me to the Business and Professions Code (BPC) <--

List of Required Records

#	Short Description	☑	Detail	CDPH Regs Section(s) (unless otherwise noted)
1	Business, Financial, and Legal Records	<input type="checkbox"/>	CDPH issued state license(s). Display the valid license prominently on the licensed premises.	40500, 40105, 40550
2		<input type="checkbox"/>	Any other valid license issued by a state cannabis licensing agency.	
3		<input type="checkbox"/>	The valid license, permit, or other approval issued by the local jurisdiction.	
4		<input type="checkbox"/>	Additional permits, licenses, and other authorizations to conduct the licensee's commercial cannabis activity. (Recommended)	
5		<input type="checkbox"/>	Financial records related to the commercial cannabis activity, including bank statements and tax records.	
6		<input type="checkbox"/>	Contracts.	
7		<input type="checkbox"/>	Premises diagram.	
8		<input type="checkbox"/>	Other records or documentation required to be kept pursuant to applicable statutes or regulations.	
9		<input type="checkbox"/>	Things submitted to, and/or received from, state and local authorities. (Recommended)	
10		<input type="checkbox"/>	Other correspondence with state and local authorities, including emails, phone call notes, etc. (Recommended)	
11		<input type="checkbox"/>	A log and notes to keep track of inspections conducted by state and local authorities. (Recommended)	
12	Security & Surveillance Records	<input type="checkbox"/>	All video surveillance recordings shall be available on the licensed premises and are subject to CDPH inspection. They shall also be copied and sent, or otherwise provided to CDPH upon request. Keep for a minimum of 90 days.	40205, 40200
13		<input type="checkbox"/>	Your security plan must establish an identification and sign-in/sign-out procedure for authorized personnel, suppliers, and visitors. Keep the sign-in/sign-out sheets in your records.	
14	Sales & Transfers	<input type="checkbox"/>	Prepare a sales invoice or sales receipt for every sale, transport, or transfer of cannabis products to another licensee. Sales invoices and receipts may be maintained electronically, but shall be readily accessible for examination by CDPH and its inspectors and agents. <i>See BPC Section 26161 and CDPH Regs Section 40505 for the list of information that must be included on sales invoices and receipts.</i>	40500, 40505 BPC 26161
15		<input type="checkbox"/>	Shipping manifests.	

16	Track and Trace System Records	<input type="checkbox"/>	Use the track-and-trace system for recording all applicable commercial cannabis activities within 24 hours of the activity, including the receipt or transfer of cannabis material/product, changes in disposition, packaging and labeling, R&D, and cannabis waste. Keep all supporting documentation for data or information entered into the track-and-trace system.	40512
17		<input type="checkbox"/>	If you lose access to the track-and-trace system for any reason, prepare and maintain comprehensive records detailing all required inventory tracking activities conducted during the loss of access. Document the cause, and the date(s) and time(s) of loss and restoration of connectivity.	40513
18	Batch Production Records	<input type="checkbox"/>	For each batch of cannabis product that is manufactured, maintain written batch production records to document the production process and, if needed, to verify that the established processes and procedures, including the preventive measures and master manufacturing protocol, were implemented correctly. <i>See CDPH Regs Section 40258 for the complete list of what must be documented.</i>	40258, 40330
19		<input type="checkbox"/>	All remediation of harvest or product batches shall be documented in the batch production records. Also keep a copy of the corrective action plan. (Recommended)	
20		<input type="checkbox"/>	Remediated products, harvest batches, or products produced therefrom, shall be tested and undergo quality assurance review in accordance with the requirements established in BCC Regulations prior to retail sale. Add the Certificate of Analysis (COA) to the record after regulatory compliance testing has been completed.	
21	Product Quality Records	<input type="checkbox"/>	Maintain product quality plans and documentation of preventive measures, monitoring results, and corrective actions. Make the records available to CDPH upon request, including during onsite inspection of the premises.	40253
22	Product Complaints and Recalls	<input type="checkbox"/>	Quality control personnel shall maintain written records for every product complaint and subsequent investigation, if any. <i>See CDPH Regs Section 40295 for details on what to include in your complaint records.</i>	40295, 40297
23		<input type="checkbox"/>	Keep records of actions taken during a product recall. (Recommended)	
24	Waste Records	<input type="checkbox"/>	If waste is collected by a third party: (1) Maintain and make available to CDPH upon request the business name, address, contact person, and contact phone number of the entity hauling the waste; and (2) Obtain documentation from the entity hauling the waste that evidences subscription to a waste collection service.	40290
25		<input type="checkbox"/>	If self-hauling: for each delivery of cannabis waste, keep a copy of a certified weight ticket or receipt from the solid waste facility.	
26	Advertising and Marketing Records	<input type="checkbox"/>	Maintain records and documentation to establish that advertising and marketing are compliant. CDPH may inspect any record or document that has a bearing on whether the labeling, advertising, or marketing of a cannabis product is in compliance. Note: If you fail to provide records to CDPH upon request that establish/demonstrate compliance, regulations specify that the licensee is required to remove or discontinue advertising or marketing.	40525
27	Standard Operating Procedures	<input type="checkbox"/>	Current standard operating procedures.	40275 and other sections
28	Personnel & Training Records	<input type="checkbox"/>	Implement a training program for all personnel present at the premises, and maintain records of training. <i>See CDPH Regs Section 40280 for the list of required information in training records.</i>	40500, 40280
29		<input type="checkbox"/>	Evidence of personnel qualifications.	
30		<input type="checkbox"/>	Evidence of training procedures.	
31		<input type="checkbox"/>	Documentation evidencing completion of California food handler certificate course from an entity accredited by the American National Standards Institute (ANSI).	

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