Toolkit · Operate Schedule Updated November 22, 2026

Record Retention Schedule

Every record the Cannabis Control Act and the CCA draft rules tell a Virginia licensee to keep, with the retention period where the source sets one (three years, two years, 90 days, 30 days) and the records for which no period is stated, each cited.

Who needs it: Every marijuana establishment and its responsible party; Dual-use medical operators (dispensing records); Regulated hemp product retail facilities (inventory and sales records).

Rule basis: Code of Virginia §§ 4.1-606 B 8 and 9, 4.1-703, 4.1-1000 L, 4.1-1008 A, 4.1-1404 C; draft rules 3VAC10-30-20, -190, 3VAC10-40-30, -40, -50, -60, -70, -100, -120, -140, -245, -265, 3VAC10-50-50, -60, -80, -90, -95, -110, 3VAC10-60-40, 3VAC10-70-55 (proposed).

Citations starting **3VAC10** are the Cannabis Control Authority's draft proposed adult-use regulations dated September 9, 2026: **proposed, not final, may change.** Citations starting **§ 4.1** are the Code of Virginia as amended by HB 30, Chapter 1 (2026). The section "What other states required or scored" is reference only and is not Virginia law.

We report what the law says. Not legal advice; see the disclaimer.

The Cannabis Control Act directs the Board to set “the form, content, and retention of all records and accounts” for licensees and hemp sellers, and names a few records directly. The CCA’s draft rules set retention periods for most operating records, mostly three years, with shorter periods for video and vehicle GPS data; some required records have no stated period. Citations to 3VAC10 are to the CCA’s draft regulations dated Sept. 9, 2026 (proposed, not final; they may change before adoption).

What Virginia requires

Statutory framework

- The Board's regulations must establish "requirements for the form, content, and retention of all records and accounts by all licensees and by any person selling a regulated hemp product" (Code of Virginia § 4.1-606 B 8).
- The regulations must provide alternative methods to maintain and store business records subject to Board inspection, "including methods for Board-approved electronic and offsite storage" (§ 4.1-606 B 9).
- Every establishment keeps complete, accurate and separate records of all marijuana it cultivated, purchased, processed, sold, developed, researched, tested or shipped, in accordance with Board regulations (§ 4.1-703 A).
- Retail stores and microbusinesses keep purchase records (prices and sellers' names and addresses), preserve purchase invoices "for a period as specified by Board regulations," and keep an accurate account of daily sales; electronic records may be stored off-site if readily retrievable for inspection at the premises (§ 4.1-703 B).
- Testing facilities keep the names and addresses of all licensees or persons who submit marijuana to them (§ 4.1-703 C).
- Records of stores and microbusinesses not available for inspection outside reasonable hours are provided to a Board agent within 24 hours of a request (§ 4.1-703 D).
- Licensees keep a record of all mandatory testing, with a description of the product submitted, the identity of the testing facility, and the results (§ 4.1-1404 C).
- All licensees file and maintain with the Board a current, accurate record of the information required under § 4.1-1000 C and notify the Board of changes under Board regulations (§ 4.1-1000 L).

- Marijuana taxes are assessed within three years of the due date, or within six years for a false or fraudulent return or failure to file; the Authority does not examine records beyond the three-year period unless it has reasonable evidence of fraud or reasonable cause to believe a required return was not filed (§ 4.1-1008 A).

Records with a retention period in the draft rules

Record	Retention period	Cite
All records relating to inventory, laboratory results, and dispensing or sales	3 years; available to the Board on request	3VAC10-40-70 B
Inventory records (initial, weekly, annual, reconciliations)	3 years from the date of the inventory	3VAC10-40-60 J
Receipt given by an enforcement officer who removes a sample or record	At least 3 years	3VAC10-40-60 K
Wholesale distribution transaction records (distributor and receiver)	3 years	3VAC10-40-50 C and D 3
Industrial hemp extract receipt records	3 years	3VAC10-50-50 D
Destruction and disposal records	3 years from destruction, kept at the establishment	3VAC10-50-110 E
Batch numbers in the seed-to-sale system	At least 3 years	3VAC10-60-40 C
Chain of custody records for each test sample	At least 3 years	3VAC10-60-40 E 7

Record	Retention period	Cite
Retail transaction error quality assurance program and records of errors and reviews	3 years, orderly and filed by date	3VAC10-50-95 E
Medical dispensing records	3 years from dispensing	3VAC10-50-80 C
Documentation of verbal or written authorization of botanical cannabis for a minor	3 years from dispensing	3VAC10-50-80 F
Dispensing error quality assurance program and records (processors and dispensing facilities)	3 years, orderly and filed by date	3VAC10-50-90 E
Copy of each patient's written certification	2 years, on site or electronically	3VAC10-50-80 A 2
Dispensing or sales records handed to new owners on a change of ownership	The two years immediately before the change	3VAC10-30-20 C 1
Vehicle GPS data for the entire duration of each transport	Not less than 90 days	3VAC10-40-265 I
Video recordings from all cameras	At least 30 days; unaltered copy kept longer during a known pending investigation or legal proceeding	3VAC10-40-140 F 4
Video of test sample collection	30 days from sampling unless the Board instructs otherwise	3VAC10-60-40 D 2

Records the draft rules require with no stated retention period

Record	Cite
Visitor log (name, date, time, purpose; log in and out)	3VAC10-40-30 I 3
Record of all regulated hemp products received, transferred, disposed of, sold or distributed (hemp retail)	3VAC10-40-40 D
Monthly hemp inventory with certificates of analysis, submitted to the CCA	3VAC10-40-60 H
Employee training record (initial and continuing)	3VAC10-40-100 C and E
Current list of people with access to the surveillance room	3VAC10-40-140 I
Vehicle registration and insurance documents	3VAC10-40-245 A
Current list of people with access to vehicle security equipment and records	3VAC10-40-245 D
Daily vehicle inspection records (“shall maintain all inspection records”)	3VAC10-40-265 C
Record of communications about an unscheduled stop	3VAC10-40-265 H
Separate sampling record (date and time, business name and license number, batch numbers, collector)	3VAC10-60-40 D 2
Safety data sheet for each hydrocarbon solvent, stored on premises	3VAC10-50-60 A 9
Reports from the designated industrial hygienist or professional engineer on flammable solvents	3VAC10-50-60 D
Certificate showing packaging is child-resistant under 16 CFR 1700.15 and 1700.25	3VAC10-70-55 A 1
Record of viewing photo ID and registration before subsequent medical dispensing	3VAC10-50-80 A 3

Record	Cite
Written alcohol-free, drug-free and smoke-free workplace policy	3VAC10-40-20 E
Recall procedures, available for CCA inspection	3VAC10-50-40 A

Record systems and handling (draft)

- An electronic record system guarantees confidentiality, safeguards against erasures and unauthorized changes after entry and verification by the pharmacist or responsible party, and can be reconstructed after a computer malfunction or accident (3VAC10-40-70 A, draft).
- All inventories, procedures and documents required by the inventory section are kept on the premises and made available to the Board (3VAC10-40-60 I, draft).
- The responsible party is responsible for ensuring that "all record retention requirements are met" (3VAC10-40-120 E 2, draft).
- Any loss or unauthorized alteration of records related to regulated products or qualifying patients must be reported immediately to law enforcement and the Board (3VAC10-40-150 A 3, draft).
- On a change of ownership, the previous owner is responsible for the proper and lawful transfer of records on the date of the transfer (3VAC10-30-20 C 2, draft).
- Before closing, the proposed disposition of dispensing records, patient information records and other required records is reported to the Board (3VAC10-30-190 B, draft).
- The Board's right of access includes copying "any materials, books, or records" of a licensee (3VAC10-80-30 A 4, draft).

What the law does not say

- Neither § 4.1-703 B nor the draft rules state the retention period for retail purchase invoices; the statute leaves it to Board regulations and the draft does not set one.

- The draft rules do not state a retention period for the visitor log, training records, vehicle inspection records or the other records in the second table above.

What other states required or scored

Not required in Virginia. Shown so applicants can see what other regulators asked for.

New York (9 NYCRR Part 125)

- New York requires required records to be kept at least five years from creation unless the Office sets a shorter period, and to be "readily retrievable" (9 NYCRR 125.13(a)-(b)).
- Covered records include floor plans, financial records including true parties of interest, personnel and training records, contracts, advertising and marketing records, operating procedures, lab results, and equipment maintenance logs naming the mechanic and date (9 NYCRR 125.13(c)).
- Security test records and visitor logs are each kept five years (9 NYCRR 125.3(c)(6), (d)(3)).

New Jersey (N.J.A.C. 17:30-9.7)

- New Jersey requires a confidential record of all sales showing buyer business, quantity, variety, form and cost, kept four years on or off premises (N.J.A.C. 17:30-9.7(b)).
- Retailers may not collect consumer personal information beyond what a Class C alcohol retailer typically acquires in a transaction (N.J.A.C. 17:30-9.7(b)2).
- Every written testing laboratory report is retained, and documentation of reportable inventory-loss events is kept in auditable form for at least two years (N.J.A.C. 17:30-9.7(c), (g)).
- The Commission may require an audit of financial records by an approved independent CPA at the business's cost (N.J.A.C. 17:30-9.7(f)).

Ohio (OAC 1301:18-3-14)

- Ohio requires records to be kept on the licensed premises unless the Division approves otherwise, in an auditable format immediately available for inspection (OAC 1301:18-3-14(A)(1)-(2)).
- Electronic systems must guarantee confidentiality, guard against erasures and unauthorized changes, support an administrative hold, and be reconstructable after a malfunction (OAC 1301:18-3-14(A)(3)).
- Documentation is retained for the current and preceding calendar year, including SOPs, cleaning, waste, inventory, security, production, packaging, testing, transport and recall records (OAC 1301:18-3-14(B)).

Maryland (COMAR 14.17.14.02)

- Maryland requires a searchable, secure, tamper-evident record of each distribution kept independent of the seed-to-sale system (COMAR 14.17.14.02A(1)).
- Licensees keep production and distribution records and daily checklists for each batch and lot, test records, a visitor log, and "a duplicate set of all records at a secure, off-site location" (COMAR 14.17.14.02A(2)-(5)).
- Unless otherwise specified, records are retained for 2 years (COMAR 14.17.14.02B).

Massachusetts (935 CMR 500.105(9))

- Massachusetts requires financial records kept under generally accepted accounting principles and available to the Commission on request (935 CMR 500.105(9)).
- Each agent's personnel record, including references, training documentation with signed attendance statements, evaluations and discipline, is kept at least 12 months after the agent leaves (935 CMR 500.105(9)(d)2.).
- After an establishment closes, all records are kept at least two years at the establishment's expense (935 CMR 500.105(9)(g)).
- Video recordings are kept at least 90 calendar days (935 CMR 500.110(5)(a)5.).

Sources checked 2026-11-22.

- Office of Cannabis Management, Express Terms adopting Parts 118-125 and 131 (9 NYCRR)
- NJ Cannabis Regulatory Commission, N.J.A.C. 17:30 Personal Use Cannabis Rules
- OAC 1301:18-3-14, Cannabis Entity Record Keeping
- COMAR 14.17.14.02, Records
- Cannabis Control Commission, 935 CMR 500.000 (effective 09-11-26)

Sources

- Code of Virginia § 4.1-606 (Regulations of the Board)
- Code of Virginia § 4.1-703 (Records of licensees; inspection)
- Code of Virginia § 4.1-1000 (Applications for licenses)
- Code of Virginia § 4.1-1008 (Statute of limitations; past-due taxes)
- Code of Virginia § 4.1-1404 (Mandatory testing; recordkeeping)
- CCA draft adult-use regulations, Sept. 9, 2026 (proposed, not final): 3VAC10-30 to 3VAC10-80

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