1.0 PURPOSE

This policy is designed to ensure that there are acceptable facilities meeting uniform standards for the storage, preparation, dispensing, quarantine, and disposition of study product(s) for the Division of Allergy, Immunology, and Transplantation (DAIT) funded and/or sponsored clinical research.

2.0 SCOPE

This document represents the minimum acceptable standards for pharmacies at clinical research sites utilizing study product(s), and conducting DAIT funded and/or sponsored clinical research.

Additional requirements may apply at sites participating in multi-center clinical research, such as those performed through DAIT sponsored clinical trials and/or clinical trials evaluating investigational agents.

3.0 BACKGROUND

Clinical research site pharmacies conducting DAIT funded and/or sponsored domestic and international clinical research are responsible for ensuring compliance with quality standards governing the receipt, use, storage, and disposition of study product(s). DAIT must ensure that 1) clinical sites are proceeding in accordance with the International Conference on Harmonisation (ICH E6) guidelines and all other applicable research standards and 2) all investigators establish and maintain records clearly documenting accountability of study product(s). Each clinical research site participating in DAIT funded and/or supported research involving the use of study product(s) must have appropriate pharmacy support, such as a pharmacist and a pharmacy.

The Pharmacist of Record is responsible for quality assurance measures and accountability processes and the management of study product(s). Responsibilities of the Pharmacist of Record include, but are not limited to: study product(s) ordering, receipt, storage, protecting unblinding/unmasking information, security, labeling, dispensing, reconciliation, return to Clinical Products Distribution Center (CPDC) or disposition, and accountability. In addition, he/she is expected to develop and maintain an adequate study product(s) management system to achieve DAIT requirements. This individual may participate in the preparation of study product(s) and special dosage forms, labeling and packaging of study product(s), monitoring adherence to study

product(s) treatment assignments, preparation of study product(s) information sheets, and development of research protocols.

4.0 DEFINITIONS

Blinding/Masking: A procedure in which one or more parties to the trial are kept unaware of the treatment assignment(s). Single-blinding usually refers to the subject(s) being unaware, and double-blinding usually refers to the subject(s), investigator(s), monitor, and, in some cases, data analyst(s) being unaware of the treatment assignment(s). (ICH E6)

Clinical Products Distribution Center (CPDC): A center responsible for supporting network-specific research pharmacy needs for study product(s) and clinical supplies distribution services to clinical sites for DAIT sponsored or funded clinical trials. All investigational and support study product(s) are acquired and maintained consistent with the U.S. Food and Drug Administration (FDA) and other regulations, and dispensed in response to specific protocol needs. The research pharmacist on staff participates in protocol development and safety evaluation as needed and provides pharmacy-specific protocol support during and following protocol initiation. (DAIT)

DAIT funded: DAIT is providing financial support for the trial or study. (DAIT)

DAIT sponsored: DAIT is responsible for the trial management (including submission of the Investigational New Drug Application (IND) to FDA and initiation of the study) and trial oversight. (DAIT)

Investigator of Record (IoR): The qualified person responsible for the conduct of the clinical trial at a clinical research site. This person is the signatory for the FDA Form 1572 (IND studies), or Igor Agreement (Non-IND studies). Written delegation of authority for specific study responsibilities may be given to qualified individuals. (ICH E6)

Pharmacist of Record: A licensed/registered pharmacist who performs the day-to-day pharmacy activities and study product(s) management including, but not limited to, the procurement, storage, preparation, dispensing, and final disposition of study product(s) for DAIT funded and/or sponsored clinical research trial(s) must be identified as the Pharmacist of Record. (DAIT)

Pharmacy: Any facility, building, or room (e.g., dispensary, drug storage unit, and drug store) used to perform one or more of the following functions: storage, preparation, dispensing, or management of study products. (DAIT)

Pharmacy Ancillary Supplies: Any materials or tools that may be used in a pharmacy to perform and support the day-to-day activities and functions of the pharmacist, such as needles and syringes, oral syringes, prescription vials and lids, gowns, masks, IV solutions, or diluents. (DAIT)

Pharmacy Equipment: Apparatus (device or machinery) that is used to ensure the physical and scientific integrity of the study product during shipment, storage, handling, and preparation. Examples of pharmacy equipment are: biological safety cabinets, refrigerators, -20^{o}C freezers, -70^{o}C freezers, air conditioners, dehumidifiers, thermometers, vortex machines, temperature alarm systems, limited access/security systems (alarms, key lock) in study product and pharmacy regulatory file storage areas, locking file and storage cabinets, shelving, counting trays for tablets and capsules, graduated cylinders, weighing scales and weights, spatulas, study product containers, labels (primary and auxiliary), fax machines, computers, and printers. (ICH E6)

Principal Investigator (PI): The qualified person designated by the applicant institution to direct the research. PIs oversee the scientific and technical aspects of a grant and the day-to-day management of the research. (NIH)

Study products: Any drug, biologic, vaccine, radiopharmaceutical, item, or device that is either provided for the study or identified in the protocol as being a study product. (DAIT)

5.0 RESPONSIBILITIES

The PI and IoR are responsible for ensuring that 1) there is a study-identified pharmacist, 2) the participating clinical research pharmacy fulfills DAIT requirements for pharmacy facilities, and 3) the pharmacy has equipment and ancillary supplies required for the conduct of the clinical trial at the clinical research site.

The PI and IoR are responsible for ensuring that all site personnel involved in the conduct of any DAIT funded and/or sponsored clinical trial are knowledgeable of the DAIT policy for pharmacy facilities to ensure the proper conduct of the clinical trial.

6.0 POLICY

6.1 There must be a pharmacy. The pharmacy (pharmaceutical service) must have the capacity to initiate, conduct, and participate in and support the DAIT funded and/or sponsored research trials to be conducted at the clinical research site. In addition to adequate equipment and supplies, the pharmacy must be of sufficient size to provide the range of activities required.

6.2 Access to the pharmacy must be limited to pharmacy staff and the pharmacy must be locked when a registered pharmacist is not present. Access to study products and study-product records must be limited to pharmacy staff.

6.3 Electrical power must be available in the pharmacy 24 hours a day, 7 days a week, through regular or alternate sources to ensure a suitable work environment and to maintain proper storage conditions for the day-to-day pharmacy operations.

6.4 Controlled study product storage conditions according to the manufacturer and/or prescribing information must be maintained 24 hours a day, 7 days a week.

6.5 Study products must be prepared and dispensed in a clean, secure, and safe environment that complies with local laws, regulations, and professional practice standards. Study products must be clearly labeled, properly stored, adequately segregated from other products, and protected from humidity, heat, light and vermin.

6.6 The site must have plans for implementing a program for inspecting, testing, and maintaining pharmacy equipment periodically, and documenting the results.

6.7 The pharmacy must have a disaster recovery program in place to protect study products stored at room temperature as well as in cold storage, in the event of water or electrical system disruption or failure due to natural calamity.

6.8 There must be proper equipment and facilities to ensure the safety of any person storing, preparing, administering, packaging, destroying, or otherwise coming into contact with the study product(s) that may pose a chemical, physical, mutagenic, carcinogenic, or other potential hazard.

6.9 Clean water and facilities must be available for washing hands, equipment, and other supplies.

7.0 Federal, local, state, and institutional regulations and guidances governing pharmacies must be followed.

7.0 REFERENCES

International Conference on Harmonisation, Guidance for Industry, E6 Good Clinical Practice: Consolidated Guidelines
http://www.fda.gov/ScienceResearch/SpecialTopics/RunningClinicalTrials/GuidancesInformationSheetsandNotices/ucm219488.htm

The Joint Commission International (JCI) on Accreditation of Healthcare Organizations
http://www.jointcommissioninternational.org/Accreditation-and-Certification-Process/

DAIT Pharmacy Manual: Pharmacy Guidelines and Instructions for DAIT Clinical Trials and Networks
http://www.niaid.nih.gov/LabsAndResources/resources/DAITClinRsrch/Documents/Pharmacy.pdf

U.S. Code of Federal Regulations, Title 21, Part 312
http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/cfrsearch.cfm

8.0 INQUIRIES

Questions and comments regarding this policy may be directed to the DAIT Clinical Research Operations Program (CROP) Policy Group at:
NIAIDCROPPolicyGroup@niaid.nih.gov

9.0 AVAILABILITY

This policy is available electronically at
http://www.niaid.nih.gov/LabsAndResources/resources/DAITClinRsrch/Pages/default.aspx

10.0 CHANGE SUMMARY

This policy is the first version: it does not supersede any other version.

11.0 APPENDICES

None.

12.0 APPROVAL

Jennifer S. Read, MD, MS, MPH, DTM&H
Director, Clinical Research Operations Program, DAIT, NIAID, NIH