PM-306 REVISION HISTORY

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01AUG2011		
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PM-306 STANDARD OPERATING PROCEDURE FOR INVESTIGATIONAL DRUG ACCOUNTABILITY, STORAGE, DISPENSING AND RETURN

I. INTRODUCTION AND PURPOSE

This standard operating procedure (SOP) describes the processes at this investigative site for the receipt, storage, dispensing, reconciliation, and return or authorized destruction of the investigational drug (study drug).

2. SCOPE

This SOP applies to all procedures related to all clinical studies subject to investigational new drug (IND) regulations for drugs and biologics during all investigational phases of development. It describes the steps followed by this clinical research site from the time the study drug is received on-site until it is either returned to the sponsor or destroyed on-site at the sponsor's request.

3. APPLICABLE REGULATIONS AND GUIDELINES

21 CFR 312.50	General responsibilities of sponsors
21 CFR 312.56	Review of ongoing investigations
21 CFR 312.59	Disposition of unused supply of investigational drug
21 CFR 312.60	General responsibilities of investigators
21 CFR312.61	Control of the investigational drug
21 CFR 312.62	Investigator recordkeeping and record retention
21 CFR 312.68	Inspection of investigator's records and reports
21 CFR 312.69	Handling of controlled substances
21 CFR1301.75	Physical security controls for practitioners

4. REFERENCES TO OTHER APPLICABLE SOP'S

GA-102	Responsibilities of the Research Team
PM-305	Study Termination Visit
PM-303	Regulatory Files and Subject Records
DM-501	Data Management

5. RESPONSIBILITY

This SOP applies to those members of the clinical research team involved in inventorying, storing, dispensing, or arranging for the return/destruction of study drug in connection with all clinical studies carried out at this investigative site. This includes the following:

- Principal investigator
- Sub-investigator

- Research Director/Manager
- Research coordinator
- Support staff

6. DEFINITIONS

The following definitions from the International Conference on Harmonisation, Good Clinical Practice: Consolidated Guideline, apply to this SOP.

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).

Investigational Product: A pharmaceutical form of an active ingredient or placebo being tested or used as a reference in a clinical trial, including a product with a marketing authorization when used or assembled (formulated or packaged) in a way different from the approved form, or when used for an unapproved indication, or when used to gain further information about an approved use.

Randomization: The process of assigning trial subjects to treatment or control groups using an element of chance to determine the assignments in order to reduce bias.

Source Documents: Original documents, data, and records (e.g., hospital records, clinical and office charts, laboratory notes, memoranda, subjects' diaries or evaluation checklists, pharmacy dispensing records, recorded data from automated instruments, copies or transcriptions certified after verification as being accurate and complete, microfiches, photographic negatives, microfilm or magnetic media, x-rays, subject files, and records kept at the pharmacy, at the laboratories, and at medico-technical departments involved in the clinical trial).

7. PROCESS OVERVIEW

A. Receipt and inventorying of study drug
B. Storage and transport of study drug
C. Dispensing of study drug
D. Return/destruction of study drug
E. Drug Diversion procedures
F. Controlled Substance Guidelines

8. PROCEDURES

A. RECEIPT AND INVENTORYING OF STUDY DRUG

RESPONSIBILITY	DESCRIPTION OF PROCEDURE
Research Coordinator Support Staff	Upon receipt of the study drug, inventory the shipment, ensuring that the information on the packing slips matches exactly with what has been sent to the site, including Amount

	Lot numbers Quantity per carrier/container (if easily verified) Promptly bring any discrepancies to the attention of the sponsor. If the sponsor includes a form in the shipment to acknowledge receipt, obtain the appropriate signature and forward the form to the sponsor/CRO. Retain a copy for the regulatory files. Ensure that any supplies required for the blinding of the study drug are available.

B. STORAGE/TRANSPORT

RESPONSIBILITY	DESCRIPTION OF PROCEDURE
Research Director/Manager PI Research Coordinator	Store study drug in a secure environment with access limited to essential research personnel, according to the storage requirements detailed in the protocol or supplied by the sponsor in a supplementary document. Ensure that study drug is stored at the appropriate temperature, maintaining a storage area temperature log, if appropriate. If the study medication is a controlled substance, it will be stored with limited access and dual controlled. Ensure that the randomization code, if appropriate, has been received. Should it be necessary to transport study drug from one site to another this should be done under controlled temperature conditions. The study drug should not be left unattended inside the transporting vehicle at any time. Every effort should be made to transport the study drug in a timely manner, and it should be stored in as secure location immediately upon arrival at the destination site.

C. DISPENSING OF STUDY DRUG

RESPONSIBILITY	DESCRIPTION OF PROCEDURE
Research Coordinator	Ensure that each time study medication is dispensed the drug accountability form is completed. Documentation will include: Amount (and lot number, if appropriate) dispensed, Initials of individual dispensing study drug, Subject's number, Date (and time, if appropriate) of dispensing, Date and time if appropriate amount of study drug returned, Amount of study drug returned. If any containers/units are missing, document the reasons. Note any discrepancies between amounts used by subjects and amounts expected to be returned and document the reasons.
Research Coordinator	Ensure that study drug supplies are adequate and within an appropriate expiration date. Alert the monitor when additional supplies will be required.

PI Research Director/Manager Research Coordinator	If emergency breaking of the study drug blind is medically necessary, document all circumstances appropriately. All efforts should be made to maintain the study blind. If study drug is a controlled substance the requirements of each specific sponsor will be followed, as required. All dispensing of controlled substances will be monitored by the P.I. (as listed on the DEA223 and DEA222). The responsibility can be delegated to the research coordinator or other trained support staff listed on the delegation log.

D. RETURN/DESTRUCTION OF STUDY DRUG

RESPONSIBILITY	DESCRIPTION OF PROCEDURE
Research Coordinator	At the conclusion of the study, ensure that all documentation regarding receipt, storage, dispensing, and return of used containers is complete, accurate, and ready for review at the monitor's termination visit. Ensure that the study drug is available for the monitor to inventory and prepare for return shipment to the sponsor/CRO, if applicable.
Research Coordinator	Destruction of study drug at this site, upon written authorization from the sponsor to do so, may be undertaken so long as such procedures are permitted by this site's OSHA and biohazard materials policies. Provide the sponsor with written documentation of the destruction of the study drug and maintain a copy in the regulatory files.

E. DRUG DIVERSION

RESPONSIBILITY	DESCRIPTION OF PROCEDURE
Research Coordinator	If study drug is found to be missing upon performing drug accountability or if a situation occurs that indicates a possible break in and it is found at that time that study drug is missing, the research coordinator should inform the Research Director/Manager and PI of the incident. If an employee suspects a fellow employee is involved in a drug diversion it is mandatory that this also be reported to the Research Director/Manager and PI. Any theft, use or sale of a controlled substance is grounds for termination.
Research Coordinator Research Director/Manager PI	The local DEA will be informed of the missing drug. If the incident is due to a break in, local police will be notified. An internal investigation will be performed, questioning the suspected employee and/or anyone found to be involved in the incident. Appropriate action will take place after investigation. Termination of involved employee will occur and prosecution will take place if warranted.

F. CONTROLLED SUBSTANCE GUIDELINES

RESPONSIBILITY	DESCRIPTION OF PROCEDURE

Research coordinator Research Director/Manager PI	Physical storage controls to include a double-locked cabinet within a locked storage room that meets the requirements specified in 21 CFR 1301.75. Only those accountable for storing controlled substance in the cabinet will have access.
Research Coordinator Research Director/Manager PI	Dispensing of Controlled Substances should be performed by the registered PI or those staff delegated by the PI. The two person rule will apply when dispensing these medications and will be noted in the Drug Accountability Log Book.