INVESTIGATIONAL PRODUCT ACCOUNTABILITY

PURPOSE: The purpose of this SOP is to ensure that records of product delivery, inventory, subject use and return of drug and drug products to sponsors are maintained for clinical trials conducted at the CRC.

SCOPE: This SOP applies to all clinical trials conducted at the CRC that involves study drug intervention.

RESPONSIBILITY:

Principal Investigator (PI):

- Accountable for receipt, storage, and dispensing of study drug
- Ensure that drug is used in accordance with protocol

Research Coordinator/ Investigational Pharmacist:

- Maintain all documentation related to study drug accountability including all shipping receipts/invoicing as part of the study file
- Initiate the Master Drug Accountability Log
- Dispense study drug
- Monitor temperature for drug supply storage
- Order drug supply for investigator initiated studies
- Instruct subject on proper use and handling of drug

DEFINITIONS:

Clinical Investigational Research Pharmacy (CIRP): A centralized investigational drug service for USF investigators conducting IRB-approved clinical trials involving human subjects.

Investigational Product Accountability: Includes documentation of the following on an ongoing basis:

- When drug supplies arrive
- When a drug is dispensed
- When a drug is returned by a subject
- When a drug is returned to supplier or is destroyed
- A pill count on the drug accountability record

Investigational New Drug Application (IND): Current Federal law requires that a drug be the subject of an approved marketing application before it is transported or distributed across state lines. As the sponsor will probably want to ship the investigational drug to clinical investigators in many states, it must seek an exemption from that legal requirement. The IND is the means through which the sponsor technically obtains this exemption from the FDA.

DEFINITIONS (cont.):

Investigational Brochure (IB): The IB is a comprehensive document summarizing the body of information about an investigational product ("IP" or "study drug"). The purpose of the IB is to compile data relevant to studies of the IP in human subjects gathered during preclinical and other clinical trials.

Investigational Pharmacist: An investigational pharmacist is responsible for the receipt, storage, accountability, dispensing and return/destruction of all investigational drugs.

Investigational Product (IP): A pharmaceutical form of an active ingredient or placebo being tested or used as a reference in a clinical trial. May also be referred to as a Test Article

PROCEDURE:

1. The Investigator and study coordinator/ research nurse will be knowledgeable of the Investigator's Brochure (IB) and protocol that provide information about the study test article, its proper use, and the required storage conditions during the clinical study.

2. For studies using the CIRP (USF Clinical and Investigational Research Pharmacy) services, please refer to the CIRP Policy and Procedure Manual for guidance on Investigational Product accountability.

3. Receipt of Investigational Product:
   - 3.1 When drug is received by the Study Coordinator/Pharmacist, the box is immediately opened and counted to ensure that the study drug is packaged and labeled with the following information:
     - Study name and number
     - Study drug name
     - Study drug dose and formulation
     - Statement: "CAUTION: New investigational Test Article-Limited by U.S. law to investigational use."
     - Study subject numbers and/or visit numbers
     - Special instructions regarding dosage or storage
     - Expiration date
     - Quantity in container
   - 3.2 For Investigator initiated studies, the Study Coordinator/Pharmacist orders drug supply from the supplier and documents receipt as above.
   - 3.3 Upon receipt of investigational study drug, an inventory is performed by the Investigational Pharmacist/ Research Coordinator/ Nurse and a list returned to the sponsor with comments on any missing test article or discrepancies.

PROCEDURE (cont.):

This inventory includes:

- A check on lot numbers
- Study subject numbers
- Number of elements in each kit
- A retained copy of inventory in regulatory documentation file

4. Storage of Investigational Product:
   - 4.1 Study drugs are stored in a secure area with restricted access, and under conditions appropriate for the material as specified in the protocol.
   - 4.2 The required storage temperature range is recorded on the drug accountability logs.
   - 4.3 The temperature of the drug storage area is monitored and recorded daily.
   - 4.4 The temperature record contains the acceptable temperature range for that storage area.
   - 4.5 If temperature is found to be outside of required range, drug is moved to another temperature monitored environment until temperature range can be restored.
   - 4.6 Sponsor is notified if drug is stored outside required range.

5. Dispensing of Investigational Product**:**
   - 5.1 Drug is prepared by a Pharmacist/Research Coordinator/ Nurse for dispensing no more than 72 hours prior to the time it is needed.
   - 5.2 If the study design has a requirement to blind the supplies, the Sponsor provides the test article randomization code and blinding supplies. The Investigational Drug Pharmacist/ Research Coordinator/ Nurse will ensure the supplies are packaged and blinded properly.
   - 5.3 If the study test article is blinded, the blind is not to be broken except in the case of an emergency or a protocol- defined situation. If the blind is broken, the sponsor is notified and the exact manner in which the code was broken and the rationale are noted in writing as a note to file in the regulatory binder.
   - 5.4 Study drug is labeled as per protocol but must include at a minimum:
     - Subject number
     - Subject initials
     - Study number
     - Protocol number
     - Name of investigator
     - Expiration Date
     - Directions for use
     - Include the statement “for investigational use only”
   - 5.5 The individual removing the medication from the drug storage area signs for the drug on the Drug Accountability Log which is always kept in the same location as the study drug.

PROCEDURE (cont.):

5.6 Investigational Product accountability records must include, as applicable:

- Name of the institution
- Name of investigational product, dose form and strength
- Protocol title and number
- Name of principal investigator
- Name of manufacturer or product source
- Lot number or other control/identification number
- Study subject initials/unique identification number
- Dose received/dispensed
- Quantity received/dispensed
- Date received/dispensed
- Remaining balance
- Initials of recorder

6. Disposal and Destruction of Investigational Product:

6.1 At the conclusion of the study, a final drug accountability check is performed to ensure that all study drugs are accounted for.

6.2 Note any discrepancies in the beginning and ending inventory and provide explanation.

6.3 A copy of the post- study inventory, and all study subject administration logs are kept in the study files at the site and a copy is returned to the Sponsor.

6.4 If requested by the sponsor, the Study Monitor and Study Coordinator package drug for return together.

6.5 Return receipt of drug is requested from the sponsor.

6.6 For investigator initiated studies, drug is destroyed in accordance with protocol guidelines.

6.7 If the Sponsor provides written instructions to destroy unused study drug, destruction will take place in accordance with USF Health Environmental Health and Safety Universal Pharmaceutical Waste Program. The CRC does not destroy IP on site.

6.8 Documentation of the destruction process is to be stored as a note to file in the regulatory binder.

6.9 Records of IP accountability are kept as long as required by Sponsor.

REFERENCES:	21 CFR 312.57- Record Keeping and Record Retention 21 CFR 312.59- Disposition of Unused Supply of Investigational Drug 21 CFR 312.61- Control of Investigational Drug 21 CFR 312.69 Handling Controlled Substances ICH GCP Consolidated Guideline—Part 4.6 Investigational Product(s)
RELATED POLICIES:	USF Clinical Investigational Research Pharmacy P&P USF Health Environmental Health and Safety Universal Pharmaceutical Waste Program
APPENDICES:	Appendix U: Investigational Product (IP) Accountability Log

REVISION HISTORY: Keep a running history of all revision dates.

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