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| **Policies/Procedures and Responsibilities** | **Yes** | **No** | **N/A** | **Citation** | **Notes** |
| 1. Does Pharmacy Service have a specific policy or standard operating procedure in place that specifically addresses investigational drug control and management?  *Note: the policy should include written instruction for the processing and dispensing of investigational drugs and/or supplies to ensure compliance with the study protocol and all Human Subject Protection requirements for each study or group of similar studies.* |  |  |  | VHA Handbook 1108.04 §4.l  VHA Handbook 1108.04 §8.d |  |
| 2. Is consideration given to include a representative from the investigational pharmacy or Pharmacy Service as either an ex-officio non-voting member or voting member of the IRB or R&D Committee?  *Note: pharmacy representative(s) who become members (either voting or nonvoting) of the local R&D Committee or IRB of Record must meet all VA, VHA, and local educational requirements for R&D Committee or IRB members, respectively.* |  |  |  | VHA Handbook 1108.04 §4.g  VHA Handbook 1108.04 §8.h |  |
| 3. Has the Chief of Pharmacy Services (or designee) ensured that: |  |  |  |  |  |
| a. there are adequate pharmacy staffing and resources to safely conduct investigational drug studies in compliance with all rules and regulations? |  |  |  | VHA Handbook 1108.04 §8.a |  |
| b. all research pharmacy staff having direct responsibilities for the management, dispensing and oversight of investigational drugs and biologicals, have completed all Human Subject Protection Training requirements and have an approved Scope of Practice?  *Note: Pharmacy staff who only assist in the research pharmacy or who only assist the research pharmacist by preparing or compounding an investigational drug (e.g., intravenous (IV) admixture) according to local Pharmacy Service standard operating procedures, and are performing within their usual scope of duties, do not need to complete the Human Subject Protection training).*  *Note: If an employee’s clinical privileges, clinical scope of practice statement, or clinical functional statement includes all of the duties necessary for a specific research study, a separate research scope of practice statement or functional statement does not need to be developed. However, if there are additional duties, these need to be included in the research scope of practice statement along with a copy of the clinical privileges, clinical scope of practice statement, or clinical functional statement.* |  |  |  | VHA Handbook 1108.04 §8.b |  |
| c. investigational drug studies have received initial approval and funding, prior to ordering, receipt, storage, or dispensing of investigational drugs? |  |  |  | VHA Handbook 1108.04 §8.f |  |
| d. study protocol documents and Investigational Drug Accountability records maintained by the Pharmacy Service are maintained according to VHA Records Control Schedule (RCS) 10-1?  *Note: In some cases, FDA regulations or sponsor requirements mandate record retention for a specified period after New Drug Application approval, or discontinuation of the IND (21 CFR Sec. 312.62). Records are to be retained according to the longest requirement at the time. Records are not to be destroyed until approval by the sponsor has been received. All documents and correspondence provided by the PI are to be maintained with protocol records.* |  |  |  | VHA Handbook 1108.04 §8.g(3) |  |

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| **Investigational Drug Supply** | **Yes** | **No** | **N/A** | **Citation** | **Notes** |
| 1. Does all investigational drug and supply management remain under the direction of the facility Chief of Pharmacy or designee? |  |  |  | VHA Handbook 1108.04 §4.m  VHA Handbook 1108.04 §8  VHA Handbook 1108.04 §10 |  |
| 2. Are all investigational drugs and supplies required by a clinical trial protocol, being used under an IND, provided by the study sponsor? |  |  |  | VHA Handbook 1108.04 §4.h  VHA Handbook 1108.04 §6 |  |
| 3. For investigational drugs and supplies required by a clinical protocol NOT being used under an IND: |  |  |  |  |  |
| a. If the drugs and/or supplies are not part of usual care for the condition or disease state under study, is the sponsor either providing the drugs and supplies or providing for procurement of these drugs and supplies using research funds? |  |  |  | VHA Handbook 1108.04 §6.a |  |
| b. If the drugs and/or supplies are not being provided by the study sponsor and instead are purchased using medical care appropriations, is reimbursement provided by the research appropriation or grant?  *Note: If the drugs and/or supplies are part of the usual care for the condition or disease state and would likely be prescribed for the study subjects (e.g., had they not met all study enrollment requirements, declined to be in the study, or there was no study taking place) then the study sponsor is not required to supply the drugs and/or supplies or provide funding; and medical appropriations can be utilized. Drugs in this category are subject to any restrictions and prior authorizations required for regular clinical care. This does not preclude the sponsor from providing the drugs, supplies or funding.* |  |  |  | VHA Handbook 1108.04 §6.b |  |
| 4. Are concurrent, comparator, or rescue medications that are required and supplied by the study sponsor and used for study-related purposes recorded by the dispensing investigational pharmacy as part of the study treatment? |  |  |  | VHA Handbook 1108.04 §4.i |  |
| 5. Are all investigational and sponsor supplied drugs delivered to the Pharmacy Service or Research Service Investigational Pharmacy for receipt, storage, security, labeling, distribution, dispensing, and disposition? |  |  |  | VHA Handbook 1108.04 §10.a(1) |  |
| 6. Are investigational drugs obtained from other facilities or PIs only with an approved Letter of Understanding (LOU)?  *Note: Detailed information as to how drugs are to be dispensed and accounted for must be clearly stated in the Investigational Drug LOU.* |  |  |  | VHA Handbook 1108.04 §10.a(2)  VHA Handbook 1108.04 §10.a(3) |  |
| 7. Are investigational drugs and supplies securely stored in the pharmacy; separate from all non-investigational drugs and supplies and clearly identified as to which study they are assigned?  *Note: Storage does not require a separate locked area within pharmacy, unless the medication has specific storage requirements.* |  |  |  | VHA Handbook 1108.04 §10.b(1) |  |
| 8. Are investigational drugs stored according to the study sponsor’s requirements (room temperature, refrigerated, in freezer, etc.) and routinely monitored? |  |  |  | VHA Handbook 1108.04 §10.b(2) |  |
| 9. Do investigational drug or supply returns and destruction follow the requirements as outlined in the study protocol?  *Note: In accordance with Federal regulations, sponsors generally require the subject to return unused clinical investigation drugs and empty containers. Clinical investigational drugs and supplies returned by subjects may not be re-dispensed. Clinical investigational drugs and containers returned by subjects are to be stored separately from study supplies that have not been dispensed. Returned supplies are either to be returned to the sponsor (at the sponsor’s expense) or destroyed according to local medical facility policies and as permitted by the sponsor.* |  |  |  | VHA Handbook 1108.04 §10.b(7)  VHA Handbook 1108.04 §10.e(1-4) |  |
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| **Storage Outside of Pharmacy Service**  *NOTE: The storage of investigational drugs outside of the Pharmacy Service needs to be discouraged when a pharmacy is located within the facility* | **Yes** | **No** | **N/A** | VHA Handbook 1108.04 §10.c | There should be a compelling reason why investigational drugs are stored outside the pharmacy |
| 1. Are there investigational drugs stored outside of the pharmacy? If yes, |  |  |  |  |  |
| a. Has the Chief of Pharmacy Services, or designee, and/or Research Service Investigational Pharmacist delegated, in writing, the custody of investigational drugs stored outside the pharmacy to the PI? |  |  |  | VHA Handbook 1108.04 §10.c(1) |  |
| b. Does the Delegation of Custody include: |  |  |  |  |  |
| i. specific procedures that the PI is required to follow? |  |  |  | VHA Handbook 1108.04 §10.c(2) |  |
| ii. the drug storage location? |  |  |  | VHA Handbook 1108.04 §10.c(2)(a) |  |
| iii. the name of the investigator responsible for the storage and dispensing |  |  |  | VHA Handbook 1108.04 §10.c(2)(b) |  |
| iv. the Signature of the PI |  |  |  | VHA Handbook 1108.04 §10.c(2)(c) |  |
| c. Is the Delegation of Custody maintained in the pharmacy? |  |  |  | VHA Handbook 1108.04 §10.c(3) |  |
| d. Has the Investigational Drug Pharmacist, or designee, verified that the storage location meets all storage and security requirements? |  |  |  | VHA Handbook 1108.04 §10.c(4) |  |
| e. Is access to the storage area restricted to authorized study personnel only? |  |  |  | VHA Handbook 1108.04 §10.c(5) |  |
| f. Does the PI maintain a real-time drug dispensing log of all dispensing?  *(Note: This dispensing log provides a method for Pharmacy Service to inspect the investigational drug inventory and track all dispensing from the storage location.)* |  |  |  | VHA Handbook 1108.04 §10.c(6) |  |
| g. Has the PI complied with all dispensing and documentation requirements and made the dispensing log accessible to the investigational drug pharmacist upon request? |  |  |  | VHA Handbook 1108.04 §10.c(7) |  |
| *Note: Distribution to other locations such as Community-Based Outpatient Clinics (CBOC) may only occur from the main pharmacy and only if the CBOC or other site is an approved research location. All investigational drugs must remain under the direction of Pharmacy Service. Investigational drugs mailed directly to the subject through centralized dispensing protocols do not need to go through the local Pharmacy Service or the Research Service Investigational Pharmacy.* |  |  |  | VHA Handbook 1108.04 §10.c(8)  VHA Handbook 1108.04 §10.c(9) |  |

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| **Controlled substances** | **Yes** | **No** | **N/A** | **Citation** | **Notes** |
| 1. For clinical investigations involving controlled substances, is detailed information kept about the following?:  *Note: Clinical investigations involving controlled substances must meet the same storage and accountability requirements as outlined for routine patient care and in accordance with applicable laws, regulations, and VA policies* |  |  |  | VHA Handbook 1108.04 §10.b(5) |  |
| a. Controlled substance review and inventory requirements as specified in VHA Handbook 1108.01 |  |  |  | VHA Handbook 1108.04 §10.b(5)(a) |  |
| b. Monthly unannounced inspection as specified in VHA Handbook 1108.02 |  |  |  | VHA Handbook 1108.04 §10.b(5)(b) |  |
| c. All controlled substance dispensing |  |  |  | VHA Handbook 1108.04 §10.b(5)(c) | VA Form 10-2638, Controlled Substance Administration Record, also known as the Green Sheet is frequently used |
| d. Controlled substances returned (including drugs drawn up, but not used) |  |  |  | VHA Handbook 1108.04 §10.b(5)(d) |  |
| e. All controlled substance record reconciliation |  |  |  | VHA Handbook 1108.04 §10.b(5)(e) |  |
| f. Controlled substances wasted |  |  |  | VHA Handbook 1108.04 §10.b(5)(f) |  |
| g. Controlled substance use, categorized by investigator and/or prescriber |  |  |  | VHA Handbook 1108.04 §10.b(5)(g) |  |

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| **Investigational Drug Orders** | **Yes** | **No** | **N/A** | **Citation** | **Notes** |
| 1. Are medications supplied or procured for an investigational study identified in the drug file as a study medication by starting with “INV”?  *Note: If the medication is already listed in the drug file, a second entry in the drug file clearly identifying the medication as a study medication or supply is required.* |  |  |  | VHA Handbook 1108.04 §4.k(1) |  |
| 2. Is the appropriate drug class from the National Drug File selected when entering the drug to ensure the proper electronic order checks for allergies? |  |  |  | VHA Handbook 1108.04 §4.k(2) |  |
| 3. Is the proper Drug Enforcement Agency (DEA) Special Handling drug code (I) designated to ensure that no co-pay is assessed?  *Note: a. Title 38 U.S.C. 1722A, Co-Payment for Medications, and 38 CFR § 17.110, Co-Payment for Medications, state that VA medication co-payments must be waived if the medication is provided to the subject as part of a VHA-approved research protocol. This waiver applies whether or not the sponsor of the investigational study provides the medication. Neither dispensed supplies nor investigational supplies are subject to co-payment; b. Co-payment eligible subjects, participating in 38 U.S.C. 7303 third-party funded VHA-approved research projects are not to be charged a co-payment for inpatient or outpatient medications provided through an investigational drug study. However, these individuals are still subject to appropriate co-payment for VHA-provided medications for non-research medical care.* |  |  |  | VHA Handbook 1108.04 §4.k(2)  VHA Handbook 1108.04 §12.a  VHA Handbook 1108.04 §12.b |  |
| 4. Has the PI or LSI provided Pharmacy Service and/or the Research Service Investigational Pharmacy, investigational drug information on each patient receiving an investigational drug through the electronic medical record or other locally-approved means?  *Note: This documentation is to include allergies, toxicities, or adverse drug events related to the investigational drug, or the potential for interaction with other drugs, foods, or dietary supplements (herbals, nutriceuticals).* |  |  |  | VHA Handbook 1108.04 §7.b |  |
| 5. Has the PI or LSI placed the completed VA Form 10-9012, or electronic equivalent, in the subject’s medical record (when applicable)?  *Note: VA Form 10-9012 must be provided to the pharmacy by the PI prior to the time of first dispensing of the investigational drug. Once on file, additional copies are required only if the form requires revision. VA Form 10-9012 informs the authorized prescribers and other clinical personnel of the side effects and any known antidote of the investigational agent, as well as who the designated contact person is for questions. VA Form 10-9012 is required on all investigational agents where a drug manufacturer’s package insert in not available. In the case of a VA Cooperative Study employing investigational drugs, the Cooperative Studies Program (CSP) Clinical Research Pharmacy Coordinating Center (CRPCC) must prepare VA Form 10-9012, for the PI at the VA medical facility.* |  |  |  | VHA Handbook 1108.04 §7.c  VHA Handbook 1108.04 §11.b(2)  VHA Handbook 1108.04 §14.a |  |
| 6. Has the pharmacist ensured that a VA Form 10-1086, Research Consent Form, dated and signed by both the subject and the individual conducting the consent process is received for each subject, prior to dispensing to the subject for the first time?  *Note: The initial order or prescription for each new subject on an investigational protocol must be accompanied by a signed informed consent or written assurance, by the provider, that the signed consent is available for viewing and printing in the electronic medical record. Pharmacy does not need to physically have a copy of the consent if it can be viewed in the electronic medical record. If there is not a physical copy of the consent maintained in pharmacy there must be a mechanism by which the pharmacist can document that the signed consent was seen before dispensing to the subject for the first time.* |  |  |  | VHA Handbook 1108.04 §8.g(1)  VHA Handbook 1108.04 §10.d(4)  VHA Handbook 1108.04 §11.a |  |
| 7. Are investigational drugs and supplies only dispensed directly to the patient, the legally-authorized representative, or authorized study personnel? |  |  |  | VHA Handbook 1108.04 §10.d(1) |  |
| 8. Are investigational drugs and supplies only dispensed after a provider, who is authorized to prescribe the drug, has submitted a proper written or electronic order? |  |  |  | VHA Handbook 1108.04 §10.d(2) |  |
| 9. Are investigational drugs and/or supplies prepared, labeled, and dispensed according to the study protocol requirements and VA regulations? |  |  |  | VHA Handbook 1108.04 §10.d(5) |  |
| 10. Do all investigational drug labels include the following legend:  “CAUTION – NEW DRUG: LIMITED BY FEDERAL LAW TO INVESTIGATIONAL USE.” |  |  |  | VHA Handbook 1108.04 §10.d(6) |  |

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| **Investigational Study File (Binder)** | **Yes** | **No** | **N/A** | **Citation** | **Notes** |
| 1. Has the PI or LSI provided the Pharmacy Service with: |  |  |  |  |  |
| a. a written approval letter signed by the ACOS for R&D that all relevant approvals have been obtained and that the study may be initiated at the site? |  |  |  | VHA Handbook 1108.04 §7.a(1)  VHA Handbook 1108.04 §9.a(1) |  |
| b. an IRB approval letter? |  |  |  | VHA Handbook 1108.04 §7.a(2) |  |
| c. a copy of the approved study protocol? |  |  |  | VHA Handbook 1108.04 §7.a(3) |  |
| d. copy of VA Form 10-9012, when appropriate? |  |  |  | VHA Handbook 1108.04 §7.a(4) |  |
| e. an Investigator Brochure, when appropriate? |  |  |  | VHA Handbook 1108.04 §7.a(5) |  |
| f. any sponsor-provided documents relating to the storage, preparation, dispensing, and accountability of the investigation products? |  |  |  | VHA Handbook 1108.04 §7.a(6) |  |
| g. protocol revisions, amendments, and updates after IRB approval and after the IRB approved the amendment? |  |  |  | VHA Handbook 1108.04 §7.a(7) |  |
| h. updates and changes to authorized prescribers after IRB approval? |  |  |  | VHA Handbook 1108.04 §7.a(8) |  |
| i. documentation of IRB continuing review approval? |  |  |  | VHA Handbook 1108.04 §7.a(9) |  |
| j. notice if clinical investigation is suspended or terminated by the IRB, R&D Committee, FDA, or other oversight group (e.g., ORO or the study sponsor)? |  |  |  | VHA Handbook 1108.04 §7.a(10) |  |
| k. notice of when the study is closed. |  |  |  | VHA Handbook 1108.04 §7.a(11) |  |
| 2. Is a real time investigational drug log or accountability record (authorized by the facility and/or study sponsor) of all transactions involving receipt, storage, dispensing, and disposition of unused stocks of investigational drugs (unless this responsibility has been delegated in writing to the PI as outlined in VHA Handbook 1108.04 §10.c) being maintained? |  |  |  | VHA Handbook 1108.04 §8.g(2)  VHA Handbook 1108.04 §10.a(3) |  |
| 3. Does the investigational drug log or accountability record contain the following: |  |  |  | VHA Handbook 1108.04 §10.b(3) |  |
| a. Name of the drug, dosage form, and strength |  |  |  | VHA Handbook 1108.04 §10.b(3)(a) |  |
| b. Manufacturer or other supply source |  |  |  | VHA Handbook 1108.04 §10.b(3)(b) |  |
| c. Date of receipt of the drug |  |  |  | VHA Handbook 1108.04 §10.b(3)(c) |  |
| d. Quantity received |  |  |  | VHA Handbook 1108.04 §10.b(3)(d) |  |
| e. Expiration, retest, or repass date |  |  |  | VHA Handbook 1108.04 §10.b(3)(e) |  |
| f. Control, lot number, or other identification (ID) number  *Note: When documentation by the clinical investigation sponsor demonstrates that the expiration date and control number (or lot number) of the medication(s) are monitored centrally, (to maintain blinding procedures or ensure continued stability) this information does not need to be maintained on the investigational drug log.* |  |  |  | VHA Handbook 1108.04 §10.b(3)(f) |  |
| g. Name of LSI |  |  |  | VHA Handbook 1108.04 §10.b(3)(g) |  |
| h. Protocol name or number |  |  |  | VHA Handbook 1108.04 §10.b(3)(h) |  |
| i. Name of subject or other subject identifier for individuals receiving the medication |  |  |  | VHA Handbook 1108.04 §10.b(3)(i) |  |
| j. Quantity dispensed |  |  |  | VHA Handbook 1108.04 §10.b(3)(j) |  |
| k. Balance of drug currently available (when amenable to protocol design |  |  |  | VHA Handbook 1108.04 §10.b(3)(k) |  |
| l. Recorder’s initials. |  |  |  | VHA Handbook 1108.04 §10.b(3)(l) |  |
| m. A final entry is made when drug therapy for the entire study (at the site) has ended.  *Note: This entry documents the date of termination of the use of the drug, the quantity remaining, the action taken to dispose of the balance on hand, and the agent or individual responsible for drug destruction or return)* |  |  |  | VHA Handbook 1108.04 §10.b(6) |  |