Audit Pharmacy Review

Rosalyn D. Williams
Alliance for Clinical Trials in Oncology, Chicago Office

Audit Workshop, November 2nd , 2017

Presentation Objectives

- Pharmacy security is important. What are the expectation at the time of the audit?
- Is storage of drug appropriate?

Are supplied drug stored under proper conditions?

- DARFs ~ Drug Accountability Record Form

Are the NCI DARFs being used and correctly maintained?

  - Standard DARF
  - Oral DARF
  - eDARF
  - Pharmacy results

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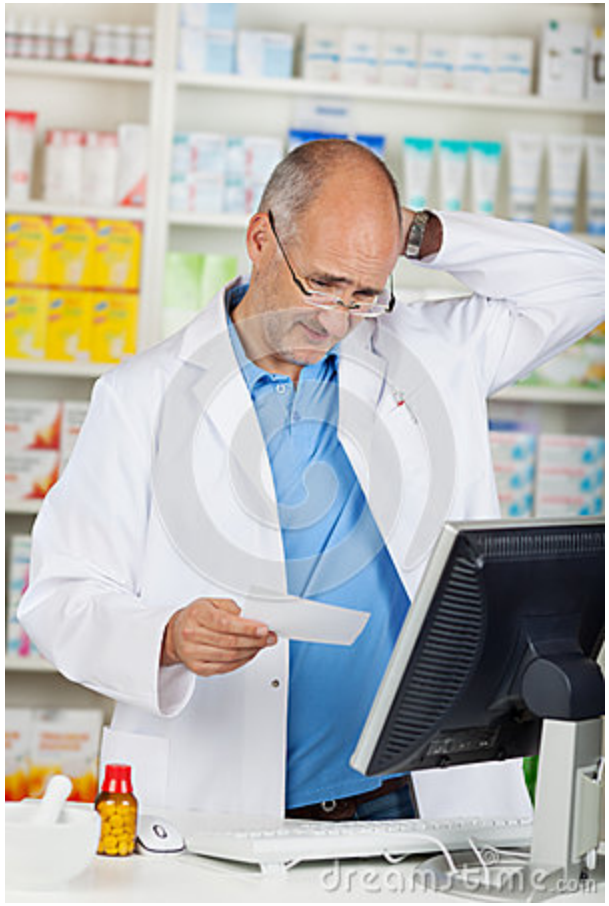
- So let's try to help sort this out…



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Security

- Access to Pharmacy
  - Who has access?
    - Pharmacy Staff
    - Research Staff
  - Is the unit locked?
    - Badge Access
    - Key
    - A bell to get into the Pharmacy

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Is this secure?

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Authorized Prescribers

- Who are the authorized Prescribers?
  - Are all Investigators CTEP registered?
  - Is there a process in place to be sure each investigator remains compliant?
  - Only Physicians that are CTEP registered can order and dispense investigational drug. Nurse Practitioners, Physician Assistant cannot order supply drug unless the order is cosigned by a CTEP registered Physician.

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Storage

- Is there temperature monitoring?
- Is there an Alarm?
- Shelf **storage**
  - Is the study drug stored separately from commercial drug?
  - Is the returned drug stored separately?
  - How are patient drugs returned?

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DARFs

- Drug Accountability Record Form
- Standard DARF
- Oral DARF
- eDARF
- These DARF's are used to track the disposition of investigational agents used for NCI clinical trials
- DARF forms can be found on CTEP website: http://ctep.cancer.gov/forms

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Standard DARF

Print Form | Save As | Reset Form

Collection of this information is authorized under 21 CFR 312.57. The information is collected to ensure compliance with Food and Drug Administration (FDA) requirements for NCI as an IND sponsor and that investigational agents are under the control and accounted for by competent authority. The information may be disclosed to researchers for investigational purposes, sponsors of clinical trials and their company collaborators, the applicable Institutional Review Board, NCI, FDA, and the Department of Health and Human Services. Submission of this information is voluntary however, in order for you to conduct a study in accordance with relevant, current protocols, you must complete all fields.

OMB No. 0925-0613
Expires: 03/31/2019
NIH-2564

Public reporting burden for this collection of information is estimated to average 4 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. **An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.** Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: NIH, Project Clearance Branch, 6705 Rockledge Drive, MSC 7974, Bethesda, MD 20892-7974, ATTN: PRA (0925-0613). Do not return the completed form to this address.

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National Cancer Institute

Division of Cancer Treatment and Diagnosis
Cancer Therapy Evaluation Program

PAGE NO.

CONTROL RECORD ☐

SATELLITE RECORD ☐

Investigational Agent Accountability Record

Name of Institution:	NCI Protocol No.:
Agent Name:	Dose Form and Strength:
Protocol Title:	Dispensing Area:
Investigator Name:	CTEP Investigator ID:

Line No.	Date	Patient's Initials	Patient's ID No.	Dose	Quantity Dispensed or Received	Balance Forward / Balance	Manufacturer and Lot No.	Recorder's Initials
1.								
2.								
3.								
4.								
5.								

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Standard DARF

Print Form | Save As | Reset Form

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Line No.	Date	Patient's Initials	Patient's ID No.	Dose	Quantity Dispensed or Received	Balance Forward / Balance	Manufacturer and Lot No.	Recorder's Initials
1.								
2.								
3.								
4.								
5.								

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Oral DARFs

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Oral DARFs

- Must be used for all NCI studies using an oral agent
- All headers must be completed
- You must use the correct dispensing row to document patient drug return by completing the date returns and the quantity returns

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Oral DARF

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Form Approved
OMB No. 0925-0613
Expires: 03/31/2016

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Investigational Agent Accountability Record
Oral agents ONLY

National Institutes of Health
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Cancer Therapy Evaluation Program

PAGE NO.
CONTROL RECORD ☐
SATELLITE RECORD ☐

Name of Institution:	Investigator Name:	CTEP Investigator ID:
Protocol Title:	NCI Protocol No.: / Local Protocol No.:	Dispensing Area:
Agent Name:	Dose Form and Strength:	Bottle size (e.g., # tablets/bottle):

Line No.	Date	Patient's Initials	Patient's ID No.	Dose	Quantity Dispensed or Received	Balance Forward / Balance	Manufacturer and Lot No.	Recorder's Initials	Expiration Date (if available)	Date Patient Returned	Quantity Patient Returned	Recorder's Initials
1.												
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Common DARF Errors

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DARF - Headers

- Common audit errors or Missing information
  - Protocol title
  - Dispensing Area
  - Control/Satellite check box
  - Page number(s)
  - Dose form and strength

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DARF Entry Errors

- Common audit entry errors
  - Entry of the drug received from the NCI
  - Patient initials not listed
  - Balance totals not completed
  - Correct patient dose

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Example of an Incomplete DARF

Investigational Agent Accountability Record
Oral agents ONLY

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CONTROL RECORD ☐
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Name of Institution:	Investigator Name:	CTEP Investigator ID:
Hematology and Oncology of America	Janey Smith, MD	987654

Protocol Title:	NCI Protocol No:	Local Protocol No:	Dispensing Area:
Phase II Trial of Enzalutamide vs. Enzalutamide, Abiraterone and Prednisone for Castrate Resistant Metastatic Prostate Cancer	A031201		Control Pharmacy

Agent Name:	Dose Form and Strength:	Bottle size (e.g., # tablets/bottle):
Enzalutamide		120 capsules/bottle

Line No.	Date	Patient's Initials	Patient's ID No.	Dose	Quantity Dispensed or Received	Balance Forward / Balance	Manufacturer and Lot No.	Recorder's Initials	Expiration Date (if available)	Date Patient Returned	Quantity Patient Returned	Recorder's Initials
1.	6-1-15	RW	1111111	40mg	-1bottle	2	12345-6	PM13	7-31-17	6-29-15	10capsules	PM13
2.	7-1-15	rec'd	from biologics	40mg	+3bottles	5	2345-6	PM13	9-15-17			
3.	6-29-15	RW	1111111	40mg	-1bottle	4	12345-6	PM13	7-31-17	7-27-15	5capsules	PM13
4.	7-5-15	T13	2222222	160mg	-1bottle	3	12345-6	PM13	7-31-17			
5.	7-29-15	RW	1111111	40mg	-1bottle	2	2345-6	PM13				
6.												
7.												

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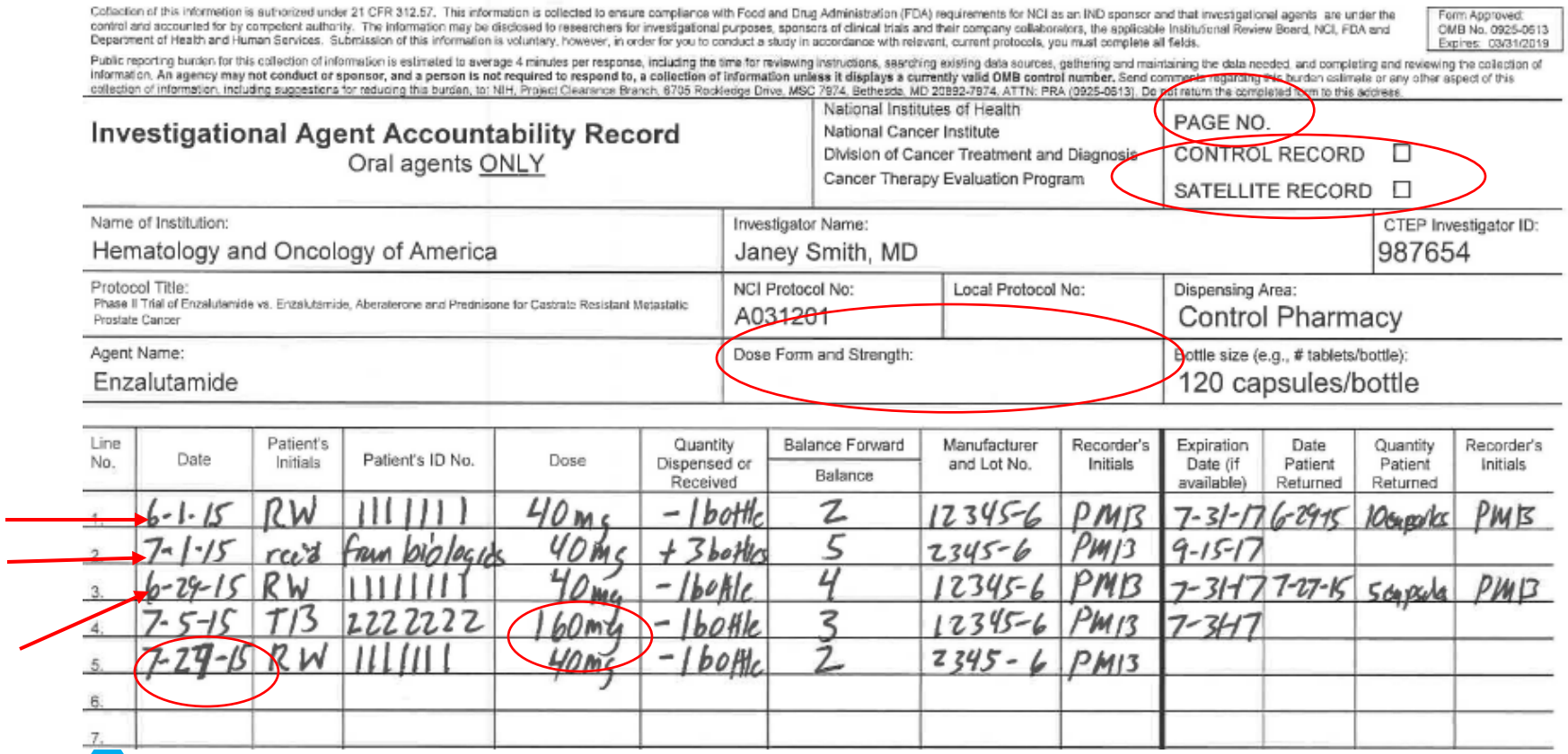
Example of an Incomplete DARF



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Form Approved: OMB No. 0925-0613 Expires: 03/31/2019

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Investigational Agent Accountability Record
Oral agents ONLY

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PAGE NO.
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SATELLITE RECORD ☐

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Hematology and Oncology of America	Janey Smith, MD	987654

Protocol Title:	NCI Protocol No:	Local Protocol No:	Dispensing Area:
Phase II Trial of Enzalutamide vs. Enzalutamide, Abiraterone and Prednisone for Castrate Resistant Metastatic Prostate Cancer	A031201		Control Pharmacy

Agent Name:	Dose Form and Strength:	Bottle size (e.g., # tablets/bottle):
Enzalutamide		120 capsules/bottle

Line No.	Date	Patient's Initials	Patient's ID No.	Dose	Quantity Dispensed or Received	Balance Forward / Balance	Manufacturer and Lot No.	Recorder's Initials	Expiration Date (if available)	Date Patient Returned	Quantity Patient Returned	Recorder's Initials
1.	6-1-15	RW	1111111	40mg	-1bottle	2	12345-6	PM13	7-31-17	6-29-15	10capsules	PM13
2.	7-1-15	rec'd	from biologics	40mg	+3bottles	5	2345-6	PM13	9-15-17			
3.	6-29-15	RW	1111111	40mg	-1bottle	4	12345-6	PM13	7-31-17	7-27-15	5capsules	PM13
4.	7-5-15	T13	2222222	160mg	-1bottle	3	12345-6	PM13	7-31-17			
5.	7-29-15	RW	1111111	40mg	-1bottle	2	2345-6	PM13				
6.												
7.												

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Completed Oral DARF

Investigational Agent Accountability Record

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Phase II Trial of Enzalutamide vs. Enzalutamide, Abiraterone and Prednisone for Castrate Resistant Metastatic Prostate Cancer	A031201		Control Pharmacy

Agent Name:	Dose Form and Strength:	Bottle size (e.g., # tablets/bottle):
Enzalutamide	40 mg capsules	120 capsules/bottle

Line No.	Date	Patient's Initials	Patient's ID No.	Dose	Quantity Dispensed or Received	Balance Forward / Balance	Manufacturer and Lot No.	Recorder's Initials	Expiration Date (if available)	Date Patient Returned	Quantity Patient Returned	Recorder's Initials
1.	5-20-15	Rec'd	from biologics	40mg	+3 bottles	3	12345-6	PMB	7.31.17			
2.	6-1-15	RW	1111111	40mg	-1 bottle	2	12345-6	PMB	7.31.17	6.29.15	10capsules	PMB
3.	6-29-15	RW	1111111	40mg	-1 bottle	1	12345-6	PMB	7.31.17	7-27-15	5capsules	PMB
4.	7-1-15	rec'd	from biologics	40mg	+4 bottles	5	23456-7	PMB	9.15.17			
5.	7-5-15	TB	2222222	40mg	-1 bottle	4	23456-7	PMB	9-15-17			
6.	7-27-15	RW	1111111	40mg	-1 bottle	3	12345-6	PMB	7-31-17			
7.	8-3-15	TB	2222222	40mg	-1 bottle	2	12345-6	PMB	7-31-17			

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eDARF's

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eDARF's

- If a Pharmacy accountability software is used, a paper copy must be printed for the audit that is identical to an NCI DARF

- The NCI/PMB does not endorse any pharmacy software package

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Pharmacy Audit Results

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Pharmacy Audit Results

- Pharmacy are either Critical–Non–Compliant, Non-Compliant, Compliant or Not reviewed.
- If the Pharmacy section has too many non-compliant issues an unacceptable rating will be assigned.
- An unacceptable will require a re-audit within 12 months
- Re-audit can be for the pharmacy section only or a full re-audit.

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Enid was finally ready to admit that compliance was a bit more complicated than she first thought.

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Critical–Non-Compliant

- Inability to track the disposition of NCI-supplied study drug.
- Multiple non-compliant categories identified.
- A single Critical Non-compliance finding.
- Any Finding identified before or during an audit that is suspected to be fraudulent activity should be cited as Critical - Non - Compliant

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Example of a Critical – non – compliant issue

- A shipping receipt for 13 bottles of study agent on 7/27/16 is not entered on the DARF. Dispensing of agent on 8/8/16 is documented on the DARF. No other entries were made on the DARF. In addition there is a shipping receipt for 13 bottles on 11/2/16. The site staff present at the audit state that there are patients still on active treatment receiving supplied study agent.

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Critical–Non-Compliant

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- Multiple non-compliant categories identified.
- A single Critical Non-compliance finding.
- Any Finding identified before or during an audit that is suspected to be fraudulent activity should be cited as Critical - Non - Compliant

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Example of a Critical – non – compliant issue

- Corrections are not lined out, initialed and dated on paper DARF
- Study – supplied agent dispensed to a registered patient/study participant and not recorded on the appropriate DARF
- Dispensing of study supplied agent to a non – registered patient/study participant

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Critical – non – compliant issue

- Lack of a DARF(s) to verify cancer control/Imaging study supplied agents are administered to patients/ study participants.
- Study – supplied agent dispensed to a registered patient/study participant and not recorded on the appropriate DARF.
- Dispensing of study supplied agent to a non – registered patient/study participant

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DARF's shipping receipts
Study specific vs. Patient specific

- How is drug supplied ?
  - Is the DARF study specific (open label) ?
  - Is the DARF patient specific (double-blinded) ?

Standard Order Shipping Record

Pharmaceutical Management Branch
Cancer Therapy Evaluation Program, DCTD, NCI
9609 Medical Center Drive
Room 5W228, MSC 9725
Bethesda, MD 20892-9725
Phone (240) 276-6575 Fax (240) 276-7893
Email: PMBafterhours@mail.nih.gov

SHIPMENT RECORD OF CLINICAL DRUG REQUEST
Date Authorized: 08/12/2014
Date Needed: 08/26/2014

Courier:
Account #
Acct Ref #
Order # 2014224-0043
Order Ref # O-1039409

NCI Protocol #	NSC	Agent Name	Strength & Formulation	QTY	MFG & LOT #
IDS-1111	724772	Sorafenib (BAY 43-9006; Nexavar)	200 mg Tablets 140 Tablets/Bottle	4	BAY CT1931/32

≠

Patient-Specific Order Shipping Record

Pharmaceutical Management Branch
Cancer Therapy Evaluation Program, DCTD, NCI
9609 Medical Center Drive
Room 5W228, MSC 9725
Bethesda, MD 20892-9725
Phone (240) 276-6575 Fax (240) 276-7893
Email: PMBafterhours@mail.nih.gov

SHIPMENT RECORD OF CLINICAL DRUG REQUEST
Date Authorized: 08/12/2013
Date Needed: 08/26/2013

Courier:
Account #
Acct Ref #
Order # 2014224-0008-BLI
Order Ref # O-1039409

NCI Protocol #	NSC	Agent Name	Strength & Formulation	QTY	MFG & LOT #
E1111	724772	Sorafenib 200 mg or Placebo	bottle 140 Tablets	4	

?

PATIENT ID: 1212121 PATIENT INITIAL: A, XX

The key is to check the drug receipt

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DARF Drug Returns

- Returns
  - Follow protocol for return or destruction
  - If possible transfer drug to another study , they will need to follow PMB guidelines.
  - Returns should be done within 90 days per CTMB guidelines (this is not pharma)
  - All documentation of return or destruction of drug should be maintained

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- PMB information
  - http://ctep.cancer.gov/branches/pmb
    - Newsletters
    - Pharmacy training Videos

- CTMB guidelines
  - Section 5.3

  ctep.cancer.gov/branches/ctmb/clinicalTrials/monitoring

  - https://www.allianceforclinicaltrialsinoncology.org/main

  Alliance P & P Section 2.8.7.3

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Questions

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"It's safe to come out - the auditors have gone."

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2017 Fall Group Meeting
November 2-4 / Chicago, IL