Investigational Drug and Biologic Management and Transfer to Satellite Pharmacies		
VCU/VCUHS CLINICAL RESEARCH STANDARD OPERATING PROCEDURES		
SOP No.: CR-IP-400.3	Status: Final	Version Date: 07/01/2024 Effective Date: 07/15/2024

1. PURPOSE

This Standard Operating Procedure (SOP) defines the processes for managing investigational drugs/biologics at VCU/VCUHS, including procedures for transfer and accountability of investigational drug products. This SOP is relevant to the receipt, storage, dispensing, reconciliation, and return or authorized destruction of any investigational drug or biologic used in clinical research. For information about investigational devices, please refer to VCU/VCUHS Clinical Research Standard Operating Procedure (SOP) CR-IP-410 Investigational Device Management.

2. REQUIREMENTS

All aspects of distribution, storage, handling, transfer to satellite pharmacies, dispensing, administration and return/deposit of investigational drugs are subject to International Conference on Harmonisation Good Clinical Practice (ICH GCP) compliance, VCU/VCUHS policies and procedures, and applicable federal, state, and local regulations.

The Principal Investigator (PI) is ultimately responsible for investigational drug management. This responsibility, however, may be explicitly delegated to another study staff such as a pharmacist, except that only study staff with the appropriate VCU Health System clinical permissions can dispense investigational drugs. When the investigational drug management is delegated to the VCU Health System Investigational Drug Service (VCU Health System IDS), the IDS pharmacist(s) will support the Principal Investigator in fulfilling these responsibilities for oversight of good clinical practice.

3. DEFINITIONS

Investigational Drug

Per Code of Federal Regulations 21 CFR 312.3 (Investigational New Drug Application - Definitions and Interpretations), an investigational drug means a drug or biological drug that is used in a clinical investigation. The term includes a biological product that is used in vitro for diagnostic purposes. The terms "investigational drug" and "investigational new drug" are deemed to be synonymous.

Other medications that do not meet the 21 CFR 312.3 (Investigational New Drug Application - Definitions and Interpretations) may require management as an investigational drug. Depending on the protocol, study-specific concurrent

medication/treatment, such as a comparator drug/placebo and rescue medication, may require protocol-specific management and accountability.

4. PROCESS

A. All investigational drug protocols must be approved by an Institutional Review Board (IRB). All drug studies must use the VCUHS IDS for drug procurement, storage, dispensing, and inventory accountability, with the exception of certain exempted drug studies, where it is not feasible for the IDS to provide drug accountability services. For these exempted drug studies, where utilization of IDS is not feasible, a Drug Management Plan (DMP) must be submitted for IDS approval and that approval must be provided to the IRB.

For drugs and biologics requiring an accredited Nuclear Pharmacy or the VCU Health System Cellular Therapeutics Lab, they will separately store, manage, and dispense an investigational drug/biologic as required by the protocol.

B. In order to request VCUHS IDS services, complete the VCUHS Initial/New Study In-take Form To request an exception, contact Investigational Drug Services.

C. The sponsor, sponsor-investigator, or clinical research organization (CRO) should confirm the anticipated date of delivery and the quantity of the investigational drug to be delivered. If an investigational drug product arrives without prior notification, this may delay the start of the trial.

D. Investigational drugs must be delivered, stored, and dispensed through the VCUHS IDS unless IDS has granted an exception (as noted in 4.A. above) or the investigational drug/biologic is managed by an accredited Nuclear Pharmacy or the VCU Health System Cellular Therapeutics Lab per protocol requirements.

E. Access to an investigational drug will be limited to key study personnel, according to the storage requirements detailed in the protocol, other instructions supplied by the product provider, and VCU Health System policies. Only individuals authorized according to the requirements of VCU Health System policies and state law are permitted to dispense investigational drug(s) to study participants.

F. All investigational drugs will be monitored and accounted for at all times throughout the course of the study, and will be handled according to the applicable regulations, sponsor or funding agency requirements and VCU Health System policies.

G. Any shipping records or signed investigational drug receipt slips or delivery notices should be filed in the appropriate protocol file.

H. VCUHS System Policies will guide:
- Inpatient and outpatient use of investigational drugs for IRB-approved protocols dispensed by the VCUHS IDS Pharmacy

- Inpatient and outpatient use of investigational drugs for IRB-approved outpatient protocols not dispensed by the IDS Pharmacy
- Inpatient use of investigational drugs dispensed from other institutions
- Emergency use of an investigational drug outside of an IRB-approved protocol

I. At the completion of the study, the remaining investigational drugs will be destroyed or returned to the sponsor in accordance with the IDS Drug Management Plan (DMP) or IDS policy, protocol requirements and in compliance with the written authorization of the sponsor or other supplier. Procedures for the destruction of any investigational drugs during the course of the trial or at study completion will comply with VCU Health System policy requirements and applicable federal, state, and local laws.

J. Transfer to Satellite Pharmacies

- When applicable and approved by IDS and sponsor, all investigational drugs for clinical research studies at VCU/VCUHS will be safely and accurately transported between the VCUHS IDS Pharmacy and satellite VCUHS pharmacies. Shipping procedures will include documentation of chain of custody, validated shippers or in transit temperature monitoring for temperature-sensitive drugs, and appropriate packaging and labeling for hazardous drugs.
  - The process of transferring the investigational product between the VCUHS IDS and satellite VCUHS pharmacies sites must be completed firstly in accordance with federal and state regulations then VCUHS Policies

5. REFERENCES

A. Code of Federal Regulations

- 21 CFR 312.60 – General Responsibilities of Investigator
- 21 CFR 312.61 – Control of the Investigational Drug
- 21 CFR 312.62(a) – Disposition of Drug
- 21 CFR 312.69 – Handling of Controlled Substances

B. FDA

- Guidance for Industry: Oversight of Clinical Investigations – A Risk-Based Approach for Monitoring (2013)

C. Good Clinical Practice

- ICH E6: Harmonized Tripartite Guideline for Good Clinical Practice
  - Section 4 – Investigator
    - Section 4.4 – Communication with the IRB/IEC
    - Section 4.5 – Compliance with Protocol
    - Section 4.6 – Investigational Product(s)
    - Section 4.7 – Randomization Procedures and Unblinding
    - Section 4.9 – Records and Reports
  - Section 8 – Essential Documents for the Conduct of a Clinical Trial
    - Section 5.5 – Trial Management, Data Handling and Record Keeping

- Section 5.22 – Clinical Trial/Study Reports
- Section 5.23 – Multicentre Trials

D. VCU/VCUHS Clinical Research Standard Operating Procedures
- CR-IP-410 Investigational Device Management

E. IRBs
- HRPP Policies and Guidance; HRPP Toolkit
  - HRP-103 - Investigator Manual
  - HRP-309 - Ancillary Review Matrix

F. VCU Health System Investigational Drug Services
- Request IDS services
- Register a trial and drug management plan without IDS dispensing

- VCUHS Policies Related to Clinical Research
- EC.FM.007 – Trash and Biological Medical Waste Disposal
- PH.MS.001 – Medication Storage and Security
- PH.MS.007 – Handling of Hazardous Medications
- PH.PT.002 – Administration of Patient's Own Medication
- PH.SP.005 – Investigational Medications
- Clinical Research Team – Clinical Permissions

Review/Revision History CR-IP-400		
Version No.	**Effective Date**	**Description**
CR-IP-400.3	07/15/2024	● Added guidance for transferring investigational drugs to satellite pharmacies, replacing CR-IP-405. ● Updated title to include biologics ● Clarified IDS involvement in DMP ● Updated how to access IDS services ● Updated references ● Links updated ● Formatting and wording edits
CR-IP-400.2a	08-01-2020	● Links updated
CR-IP-400.2	08-01-2020	● Biennial review performed ● Minor formatting edits ● Reference links updated
CR-IP-400.1	08-27-2018	● Original