



(Monday 6:59am) 29 January 2001

Memorandum

To: Center for Clinical Trials faculty and staff

Fr: Curt Meinert

Re: Drug labeling and distribution good practice policies and procedures (GPPP)

Definitions

bin drug dispensing system n - A system of dispensing drug in masked trials in which treatment assignment is indicated by bin number (see Coronary Drug Project for example involving 30 bins); system in which more than one person receives medication from the same bin, the number being a function of the number of bins and enrollment; system easier to implement and manage than **Id drug dispensing system** and usually drug conserving; down side relates to potential for **collateral unmasking** if a bin is unmasked.

bin number n - 1. A number (or letter) code identifying a storage bin; eg, numbers 1 through 10 identifying bins containing study drug or matching placebo. 2. A number referenced in a treatment assignment identifying the bin from which medicine is to be taken. 1. A number appearing on the label of a medicine dispensed in a double-masked trials involving a bin system of drug supply. rt: **bottle number**

central pharmacy n - 1. A pharmacy serving multiple clinics. 2. A pharmacy responsible for compounding or dispensing drug to local pharmacies or clinics. ant: **local pharmacy** rt: **drug distribution center**

clinic identification number, clinic Id number, clinic Id n - A number or set of alphabetic characters serving to identify clinics in multicenter trials.

collateral unmasking n - Unmasking occurring as a secondary consequence of an action or event; in regard to treatment assignment in masked trials, the number of other assignments that are unmasked when the treatment assignment for a single treatment unit is unmasked.

drug dispensing system n - The system for dispensing drug to persons enrolled in a trial; see bin drug dispensing system and Id drug dispensing system.

drug distribution center n - A center responsible for distribution of drugs to clinics. rt: **central pharmacy**

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Id drug dispensing system *n* - A **system** of dispensing **drug** in **masked trials** in which **treatment assignment** is indicated by a unique **med Id number** specific to a person (unlike assignments in **bin drug dispensing systems**).

local pharmacy *n* - A **pharmacy** located in or near a **clinic**. ant: **central pharmacy**

medication identification number, medication Id number, medication Id *n* - A number or set of alphabetic characters or symbols, that, when decoded, serves to identify a medication being dispensed and administered in double-masked fashion, eg, **bin number**.

patient identification number *n* - A unique sequence of numbers or numbers and letters used to identify a **patient**; **study identification number**

P&P 1: In multicenter trials opt for a central pharmacy and drug distribution center if any of the following apply:

- One or more of the drugs has to be formulated
- One or more of the drugs has to be packaged for dispensing
- Drugs are masked
- Two or more test drugs
- Trial done under an IND

P&P 2: Assume study drugs are to be received and dispensed from a clinic pharmacy; plan to ship drug to local research pharmacies except when otherwise instructed.

P&P 3: Shipping cartons should be labeled as to content (labeling required for interstate shipment).

Comment

The labeling requirement, when drugs are masked, is achieved by use of a sealed label to be opened only in an emergency or by use of an "either or" type label, eg, *This carton contains 100 bottles of aspirin or matching placebo.*

P&P 4: Dispense masked medications with the means to unmask.

Comment

Clinics require that means (eg, if Johnnie gets into a Mon or Dad's pills). The means is achieved by a 1 800 number, deposit of the treatment assignment codes at clinics, or by use of sealed labels (see P&P 9).

P&P 5: Opt for a two-part dispensing label; see P&P 6 and 8.

P&P 6: The tear-off label should include the following:

- Lot number and run number
- Expiration date
- Medication Id

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- Patient Id no. or name code
- Date dispensed

P&P 7: Use the tear-off portion of the label to document drug dispensing; most easily accomplished by pasting the labels on a study form designed for use in dispensing drug to study subjects.

P&P 8: The label affixed to bottles or packets dispensed to study subjects should include the following:

- Lot number and run number
- Expiration date
- Medication Id no.
- Patient Id no.
- Patient name or name code
- Dosage and use instructions
- Date dispensed
- Clinic Id
- Clinic contact and phone number

P&P 9: If drug is masked and supplied to clinics with a sealed label ensure that:

- The label is opaque so that contents cannot be identified by transillumination of the label
- The outer portion of the label includes the following:
 - Statement indicating that the label is not to be opened except in emergency and that it reveals the content of the bottle or packet
 - Statement that the label is to be removed before dispensing
 - Name of person or center to be notified when the label is opened
- The inner portion of the label includes the following:
 - Contents of the bottle or packet
 - Medication Id no.
 - Lot no.
 - Expiration date

P&P 10: When drugs are to be dispensed in masked fashion, opt in favor of systems with minimal collateral unmasking.

Comment

Designers have to decide whether to dispense medications using unique medication Id numbers or a bin system of dispensing. The bin system is more economical than systems involving unique medication Id numbers, but there is collateral unmasking with the system. The amount of unmasking depends on the number of assignments made to the bin being unmasked.

P&P 11: Lean toward the bin system of dispensing medications when:

- The need to unmask is low

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- Treatment extends over a period of years
- The duration of treatment is not set when the trial is designed
- The period of treatment varies
- Multiple lots of drug will be needed over the course of the trial
- Drug is expensive or in short supply

P&P 12: In bin systems, the number of bins in a clinic should be large enough so that the amount of collateral unmasking occurring if a bin is unmasked is small relative to the finished sample size of a clinic.

P&P 13: Retain samples of each lot and run for identification, concentration, and purity analyses.

P&P 14: In masked trials, ensure that drugs are bottled and labeled in identical fashion.

Comment

Often easier said than done.

Drugs, even if packaged by a central pharmacy, will be packaged in different runs sometimes leading to differences (eg, in bottle hue or in the way caps are sealed) sufficient to allow one to identify medications.

Efforts are required to ensure that label format and content is uniform. Expiration dates have to be the same. Run and lot numbers have to be camouflaged.

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