SOP#: PM-8	**Conducting and Documenting Drug Accountability for Oral Investigational Products that are Self-Administered by Research Participants**
Version #: 5.1	**Next Review Date: 5/2026**
Approved Date: 5/2024	**Review Interval Period: Biennial**
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POLICY

All oral self-administered investigational products will be properly accounted for, handled, and disposed in accordance with existing NIH policy, federal regulations and principles of Good Clinical Practice.

When shipping any investigational products (IP) to participants and consistent with pharmacy policy on shipping:

- The participant/representative must be available to sign for the delivery.
- An appropriate shipping container system must be used to ensure safe and undamaged conditions upon arrival to the study participant and be sent overnight courier.
- The need for shipping IP must be documented in CRIS by the study team.
- Study team must maintain documents related to shipping, including tracking information.
- Study team must contact study participant to ensure the shipment was received and document confirmation of receipt in CRIS.

IP that does not arrive to the participant as scheduled must be returned to the NIH pharmacy and replacement IP sent.

PURPOSE

To identify all activities associated with drug accountability for participant self-administration of oral investigational products, ensuring error-free drug accountability for clinical trials which involve participants receiving oral investigational products.

RESOURCES

NIH Pharmacy Department Policies

- CCP-40002: Processing Patient Returned Investigational Products
- CCP-4002.1 Investigational Product Disposal

PROCEDURES

STEP 1: Dispensing of Investigational Product

- Investigational products (IP) are dispensed from the Clinical Center Pharmacy Department to a participant or to a Patient Care Unit for self-medication.
    - Investigational Drug Control Unit (IDCU) in the Pharmacy Department manages IP receipt from the sponsor/manufacturer, IP storage and IP return from the participant.
- A record of dispensed IP is generated by Pharmacy personnel and documented on the drug accountability record form (DARF).
- If shipping IP to participant, the Clinical Research Coordinator (CRC) must:
    - Inform the participant that the IP delivery requires a signature.
    - Document the reason for shipping in CRIS.
    - Contact the participant to ensure the IP has arrived in the proper timeframe and in good condition. This information must be documented in CRIS.

STEP 2: Self-Administering Oral Investigational Product

- A participant self-administers IP according to protocol directions.

STEP 3: Return of Unused Oral Investigational Product

- Per protocol, a participant will return unused oral IP, along with their completed participant medication diary (if applicable per protocol), to the CRC. This includes empty bottles, empty blister packs and/or empty foil packs as specified in the protocol or required by the sponsor.
- If a participant goes off study while at home, the CRC will ensure and document the return of the unused oral IP from the participant. This might include sending a pre-paid envelope/box to the participant/family so they can return the IP if they are not returning to the Clinical Center.
- If applicable, the CRC reviews and validates the completeness and accuracy of the participant's medication diary (or other document as specified in the protocol) with the participant.

STEP 3a: Counting of Returned Oral Investigational Products – must be completed by CRC

- Determine amount to be returned prior to clinic appointment
- Count pills using clean technique and return to bottle
- The original pharmacy dispensing label must be on the bottle. If the original dispensing label is no longer on the bottle, please write the name and strength of IP on the bottle.
- If sealed bottles are returned, do not break the seal, note return as the amount listed on the bottle

STEP 3b: Disposing of Unused Investigational Products – must be completed by CRC

- Obtain IP return bag from the Clinical Center (CC) 6th floor Pharmacy Depository (Room 6C417) and print IP Return Form (Appendix A).
    - If the sponsor has provided an IP drug return form that contains similar information, the sponsor form may be used. Please send to pharmacy for review prior to use.

- Complete the IP Return Form and make a copy for research records
- Put all returned oral IP bottles, including empty bottles, in the IP return bag with the IP Return Form.
- Deliver the bag with the unused IP to the 6th floor Pharmacy Repository (Rm 6C417) and place in the designated drop slot located on the wall.
    - This can be delegated to another staff member or NIH Messenger or Escort Services.

STEP 4: Documenting Oral Investigational Product and Disposing of Returned IP – Must be Completed by Clinical Research Coordinator

- The amount of IP dispensed is in CRIS (under Orders), the amount taken by the participant, and the amount of returned unused IP is reconciled and documented in the medical record.
    - Reconciliation will ensure that all dispensed doses are properly accounted for, with explanation for any inadvertently lost or destroyed IP.
    - CRIS structured note: "Research Nurse Protocol Note" may be used for documentation in the medical record.
- Review medication diary with participant if applicable

STEP 5: Missing Oral Investigational Product

- If a participant does not return their IP, please make every attempt to get the IP, including sending a pre-paid container to the participant/family.
- Document attempts to retrieve IP in the participant's CRIS medical record.
- If applicable, report missing IP to the IRB as a protocol deviation. The type of deviation [major (requires expedited reporting) versus minor (requires reporting at time of continuing review)] is the determination of the PI.

STEP 6: Accounting for Discarded Unused Investigational Product and Disposal

- Verifying participant returned IP
    - The IP returned to the 6th floor Pharmacy Repository is verified by an IDCU staff to ensure that the information on the IP label and quantity returned matches the information on the IP Return Form.
    - Any observed discrepancy must be communicated to the PI or PI's designee upon discovery.
    - The PI or PI's designee must provide a reasonable explanation within 5 business days from the time the discrepancy was communicated.
    - If the IDCU staff does not receive a response within 5 business days or the information provided is insufficient to complete the verification step, the IDCU staff will document the actual observed amount of IP or discard the IP without documentation.
- Documenting participant returned IP on the DARF
    - If the IDCU staff verifies that the IP received matches the record on the IP Return Form, the information will be recorded on the DARF.

- If the IDCU staff CANNOT verify that the IP received matches the recorded information on the IP Return Form and did NOT receive a reasonable explanation within 5 business days from the PI or PI's designee, then the actual observed amount of IP will be recorded on the DARF.

NOTE: The IP could be discarded without any documentation if information available is insufficient to perform the documentation.

- Disposing of participant returned IP
  - Once the returned IP is reconciled and documented, the product will be destroyed in the manner outlined in Pharmacy Policy and Procedure 4002.1 Investigational Product Disposal.
  - The Sponsor may request to have the returned IP retained onsite for review prior to destruction. The request must be communicated to an IDCU staff in writing prior to protocol initiation. The written communication will be archived electronically and/or as a hard copy with the related protocol documents.
  - The IP Return Form will be shredded after the reconciliation is documented and the IP is processed for final disposal.