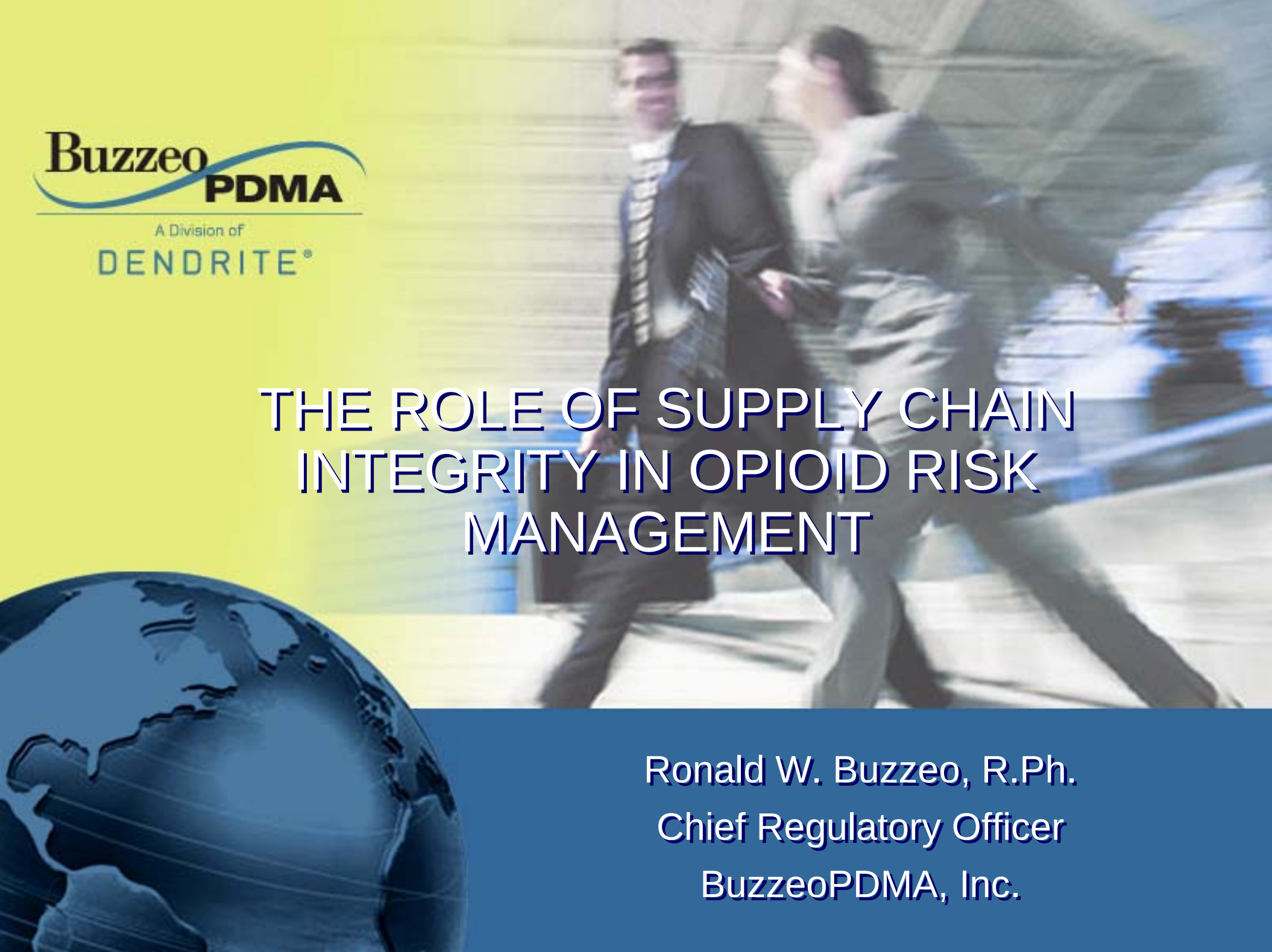

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THE ROLE OF SUPPLY CHAIN INTEGRITY IN OPIOID RISK MANAGEMENT

Ronald W. Buzzeo, R.Ph.
Chief Regulatory Officer
BuzzeoPDMA, Inc.

Outline

- Scheduling
  - International
  - Domestic
- Impact of the Controlled Substances Act (CSA)
- State Regulatory Issues
- State Licensing Requirements
- Risk Management Plans
- Detection Initiatives

Scheduling

Evaluation of Drugs and Substances

- AG Shall request from the Secretary
  - Scientific and medical evaluation
  - In making such an evaluation the Secretary shall consider the following factors:
    - Its actual or relative potential for abuse. (AG) (Sec)
    - Scientific evidence of its pharmacological effect, if known. (Sec)
    - The state of current scientific knowledge regarding the drug or other substance. (Sec)
    - Its history and current pattern of abuse. (AG) (Sec)
    - The scope, duration, and significance of abuse. (AG) (Sec)

Scheduling

Evaluation of Drugs and Substances (Continued)

- AG Shall request from the Secretary
  - Scientific and medical evaluation
  - In making such an evaluation the Secretary shall consider the following factors: (continued)
    - What, if any, risk there is to the public. (Sec)
    - Its psychic or physiological dependence liability. (Sec)
    - Whether the substance is an immediate precursor of a substance already controlled under the CSA. (Sec)
- International treaties, conventions, and protocols requiring control
  - AG shall issue an order controlling such drug under the schedule deemed most appropriate.

Scheduling

- International Scheduling

  - WHO – World Health Organization
  - INCB – International Narcotics Control Board
  - CND – The Commission on Narcotic Drugs

Diversion Issues

Diversion

- Illicit sales
- Scrams
- In-transit losses
- Thefts
- Fraudulent prescriptions
- Illicit distribution by patients and healthcare professionals (HCPs)
- Abuse by HCPs and patient relatives
- Disposal
- Returns

Abuse

- Schedule II
- Schedule III
- Schedule IV
- Schedule V

Impact of the Controlled Substances Act

Registration

- Non-Practitioner
- Practitioner

Records

Reports

- DEA 106 (Theft and loss)
- DEA 41 (Disposal)
- ARCOS
  - Schedule I and II
  - Schedule III narcotic

Security

- Physical
  - Schedule I and II
  - Schedule III, IV and V
- SOMs
- Registration verification

Impact of the Controlled Substances Act

Quota

- Aggregate
- Manufacturing
- Procurement

Import

- Limitations

Export

- Limitations

Inventories

Labeling

Prescriptions

- Schedule II
  - No refills
  - Written
- Schedule III, IV and
  - Refills
  - Written, faxed, oral

State Issues

- Each state has the ability to define its requirements and definitions.
- Each state does so specifically by legislation, regulation or by interpretation by board, counsel, or executive director.

Where Do the States Fit in?

Scheduling

- Automatic
- Administrative
- Legislative

Licensing

- Types of licenses (in-state and out-of-state)
  - Manufacturers
  - Wholesalers
  - Distributors
  - Brokers

Puerto Rico

- Registration of Product
- Resident Agent

Coupons/Vouchers

State Registration Requirements

Who is affected by the licenses requirements?

- Manufacturers
  - Sponsor manufacturers
  - Contract manufacturers
  - Sampling
  - Sales representatives
- Distributors
- Wholesalers
- Sales and marketing companies
- Hospitals
- Clinics (state dictates category)
- Pharmacies

State Requirements: Why License?

- 46 of the 51 states require out-of-state licenses
- Legitimacy for distribution of products
  - Counterfeit, diversion, illicit activities
  - National Association of Boards of Pharmacy Model Rule
  - States are the first level of enforcement
- Provides a chain of custody
  - Must go forward and backward
- Validates compliance with PDMA and state requirements

What Is Required of the Registrant?

- Compliance with registration and state regulations
  - Penalties
    - Administrative, criminal, civil
  - Seizure of product
- Policies and procedures
- Records
- Reports
  - Suspicious-order monitoring
  - Registration verification (state and DEA)
  - Loss and theft reporting
- Inventories

Detection Initiatives to Protect Supply Chain Integrity

FDA

- Draft Guidance on Notification
- Changes to Products, Packaging, Labeling
  - Encourage Timely Adoption and Adaptation of Effective Technologies
- Adoption of Electronic Track and Trace Technologies to Surpass the Goals of the PDMA
- Adoption and Enforcement of NABP'S Model Rule
- Increased Criminal Penalties
- Adoption of Secure Business Practices
- Effective Reporting
- Education
- Collaboration with Foreign Stakeholders

State Initiatives

NABP

- Model Rules for the Licensure of Wholesale Distributors
  - ADR
  - Surety Bond
    - Central Clearing House
  - Licensure (Site/Out-of-State)
  - Designated Representative
  - Storage
  - Security
  - Due Diligence

State Initiatives

NABP

- Model Rules for the Licensure of Wholesale Distributors
  - Record Keeping
  - Pedigree
  - Prohibited Acts
  - Policies and Procedures
  - Training

Risk Management Plans: A Strategic Safety Program

Food and Drug Administration (FDA) and Drug Enforcement Administration (DEA) agree that a risk management plan (RMP) is essential

- Minimizes risks
- Keeps product available for patients
- Identifies appropriate patients
- Ensures safe prescribing
- Informs patients as to safe and appropriate use
- Monitors for adverse outcomes

DEA requires implementation of programs to prevent diversion and abuse

- Labeling
- Promotion
- RMPs

RMPs

- Clear, strong wording in the labeling for patients and professionals
- Professional and Patient Educational
- Surveillance for Misuse/Abuse/Detection
- Intervention Measures

RMPs: Educational Programs

Professional and Patient Education

- Patient
  - Informational leaflet satisfies the patient

Professionals

- Tailored to the audience
  - From the Manufacturer as well as any intermediaries to the end customer
- Appropriate education material
  - Printed materials
  - Computer based materials (e.g. web-based or CD Rom)
  - Seminars and presentations to the end user
  - Interactive programs, presumably aimed at gauging effectiveness of the educational or training program

RMPs: Educational Programs

Surveillance

- Cover at least the following:
  - Pharmacovigilance(e.g. adverse-event reporting)
  - Distribution chain integrity (e.g. detection of diversion and suspicious ordering patterns)

RMPs: Ongoing Surveillance

- Internal and external controls
  - Manufacture
  - Distribution
  - Product complaints
- Surveys
  - Federal, state, and local
  - Pharmaceutical market research programs
- Liaison
  - Law enforcement
  - Professional associations
- Transportation/Carrier Certification

RMPs

Intervention

- Respond effectively to reports of abuse, misuse, addiction, diversion, overdose, or other serious adverse events
  - Obtained through ongoing surveillance program
  - Notification of management, government agencies and security once diversion/misuse/abuse is detected

Follow-up action

- Regional education programs
  - Targeted educational programs

Detection Initiatives to Protect Supply Chain Integrity

- Research and Determine Feasibility and Legality of Obtaining Drugs From The Internet
  - Counterfeit
  - Diverted
  - Outdated/Damaged
- Project Plan
  - Obtain Required State Licenses
  - Identify Targeted Drugs
  - Identify Sites
  - Obtain Drugs
  - Utilize Prescriptions

Detection Initiatives to Protect Supply Chain Integrity

Pharmacy

- Legal and Regulatory Issues
  - Obtaining Drugs
    - Counterfeit
    - Diverted
    - Outdated/Damaged
    - Patented Protected Product

Secondary Market

- Legal and Regulatory Issues
  - Obtaining Drugs
    - Counterfeit
    - Diverted
    - Outdated/Damaged
    - Charge Backs

Detection Initiatives to Protect Supply Chain Integrity

- Prescriptions vs. Distribution
  - Patient Population
- Quality Complaint Trending
  - Shortages
  - Non-Effective

Detection Initiatives to Protect Supply Chain Integrity

- Technology
  - Track and Trace Product Authentication
    - RFID
    - Electronic Pedigree
    - Color Shifting Inks
    - Holograms
    - Chemical Markers
- Adoption and Enforcement of Strong Laws by States – NABP'S MODEL ACT

Detection Initiatives to Protect Supply Chain Integrity

- Increase Penalties – NABP'S MODEL ACT
- Secure Business Practices
- Effective Reporting
- RMPs
- Education
- Develop International Strategies
  - Regulatory Agencies
  - Surveys
  - Counterparts
- Voluntary Compliance

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