

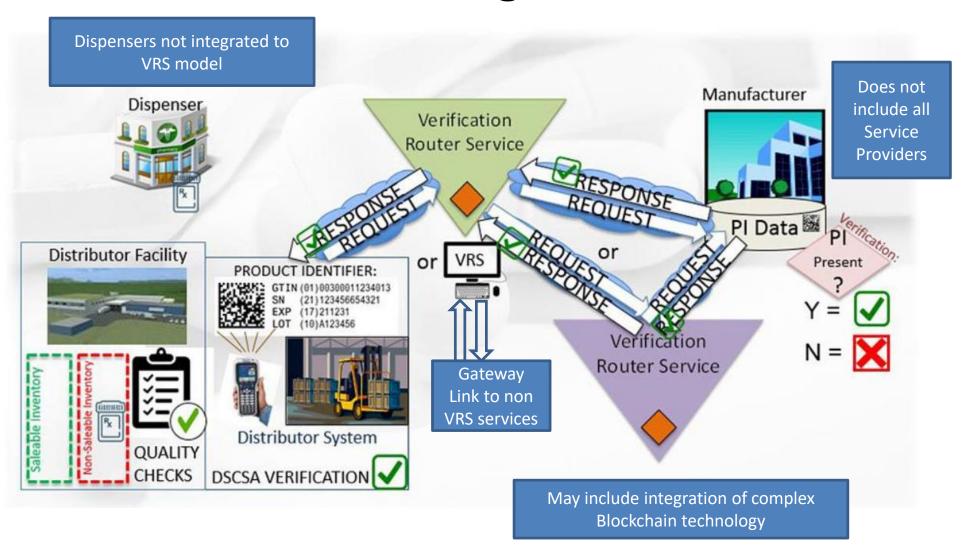
Drug Supply Chain Security Act - Verification Requirements

What is expected of manufacturers?

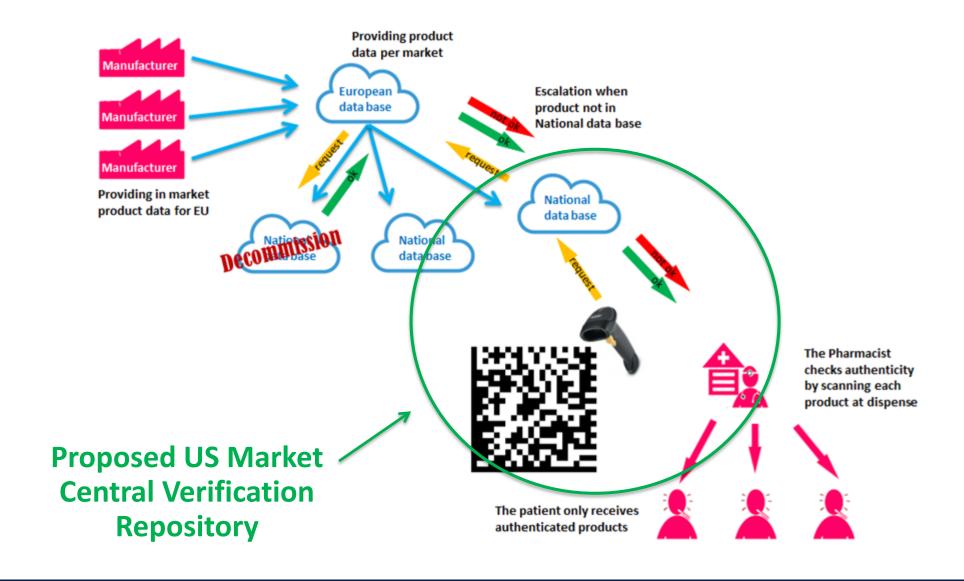
- 2015 Verification of Suspect or Illegitimate product
- 2017 Enhanced Verification of product utilizing the unique serialized identifier of the product
- 2019 Verification of an authorized trade partner's salable returns
- 2023 Interoperable systems and processes for verification
- 2023 Association of transaction to each saleable unit

What can we do now?

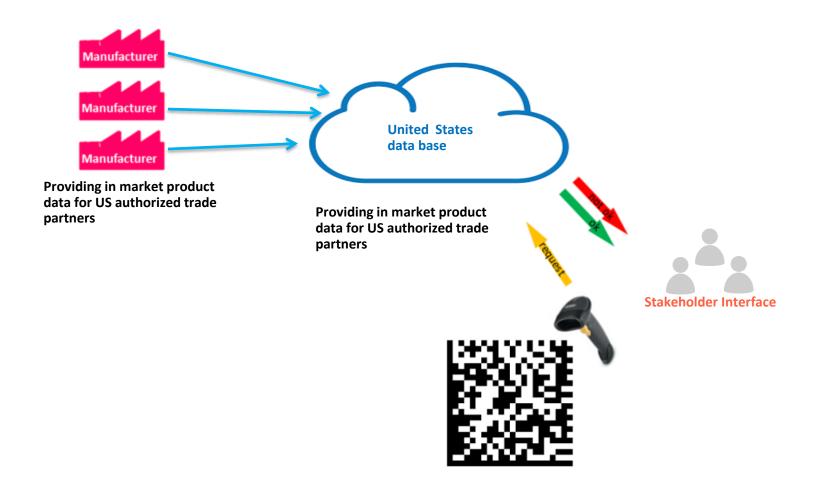
We can Pilot a Very Complex Distributor Managed VRS Model



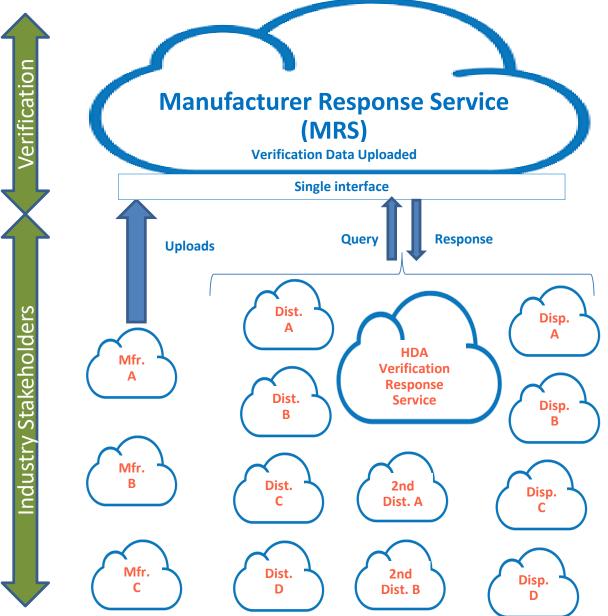
Or Something Similar to the European Database Structure



Similar to the European Database Structure..... Yet Simpler



Proposed US Market Central Repository



Verification Data = Legitimate serial numbers allocated to a specific lot

To meet DSCSA requirements, Downstream trade partners are required to verify serial numbers back to the manufacturers data sets.

This solution provides one location to locate the data. The approach is similar the EU model.







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Help

Trade Partner Log In





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Product Verification





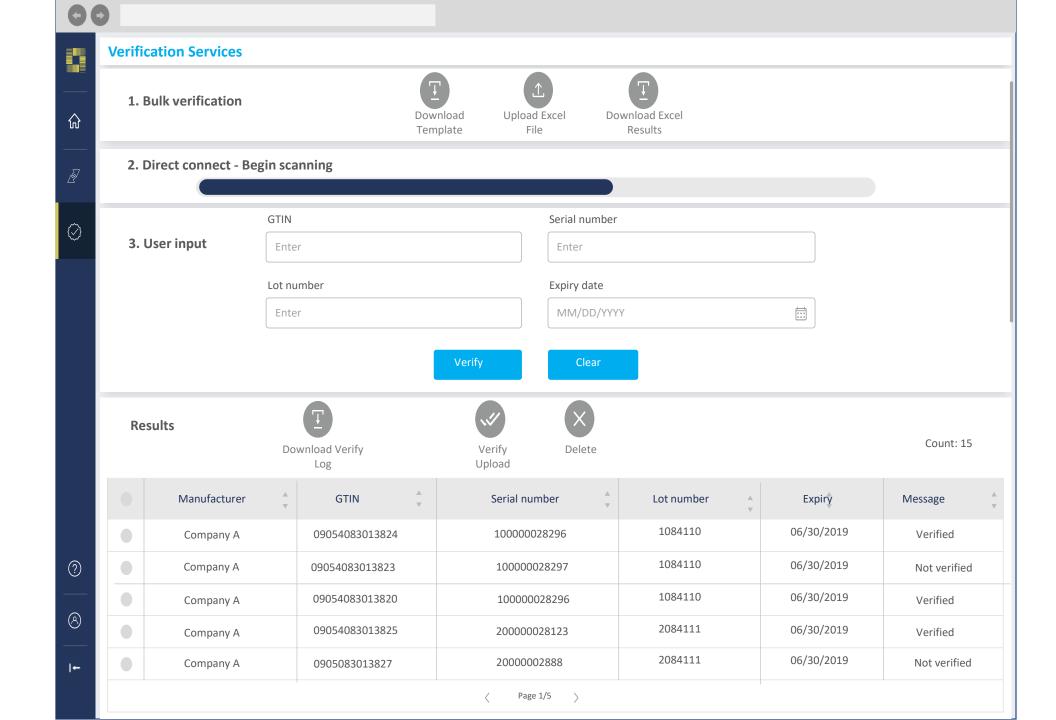
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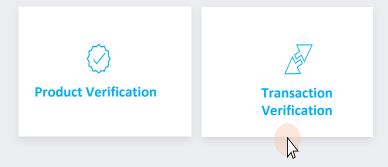
Verification Service uses the most recent event to determine if the product is valid

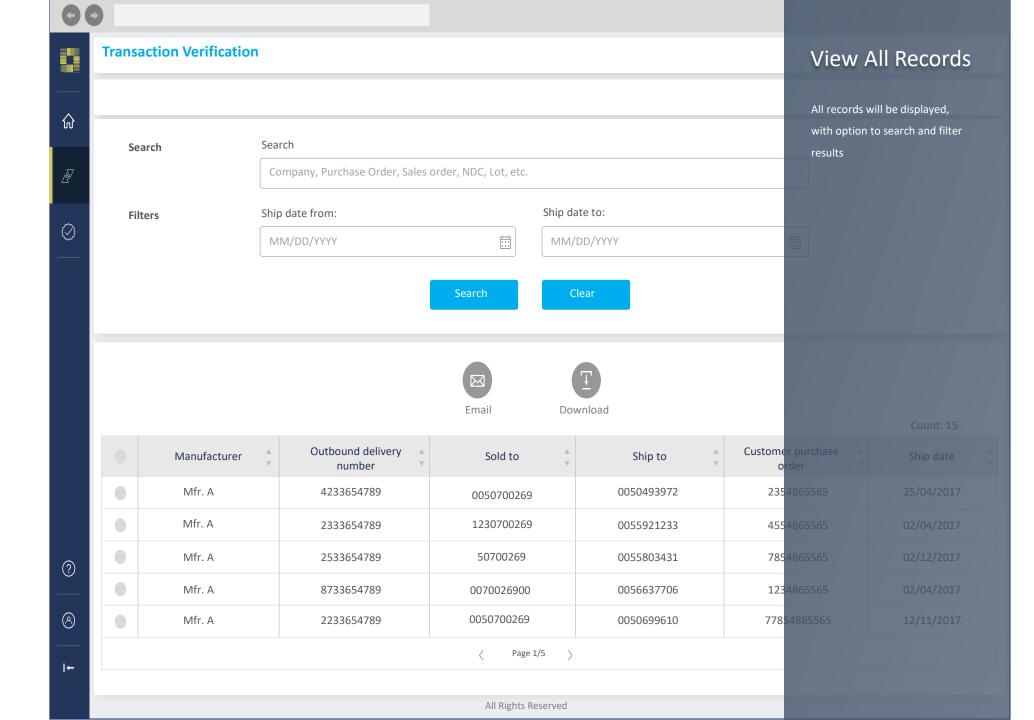
Product Event Disposition	Verification Response			
in_transit	VALID			
active	NOT VALID (StillAtMfr)			
in_progress				
returned	NOT VALID (Returned)			
expired	NOT VALID (Expired)			
damaged	NOT VALID (Damaged)			
disposed	NOT VALID (Disposed)			
recalled	NOT VALID (Recalled)			
destroyed	NOT VALID (Destroyed)			
stolen	NOT VALID (Stolen)			
Anything else	NOT VALID			
	(UnexpectedDisp)			

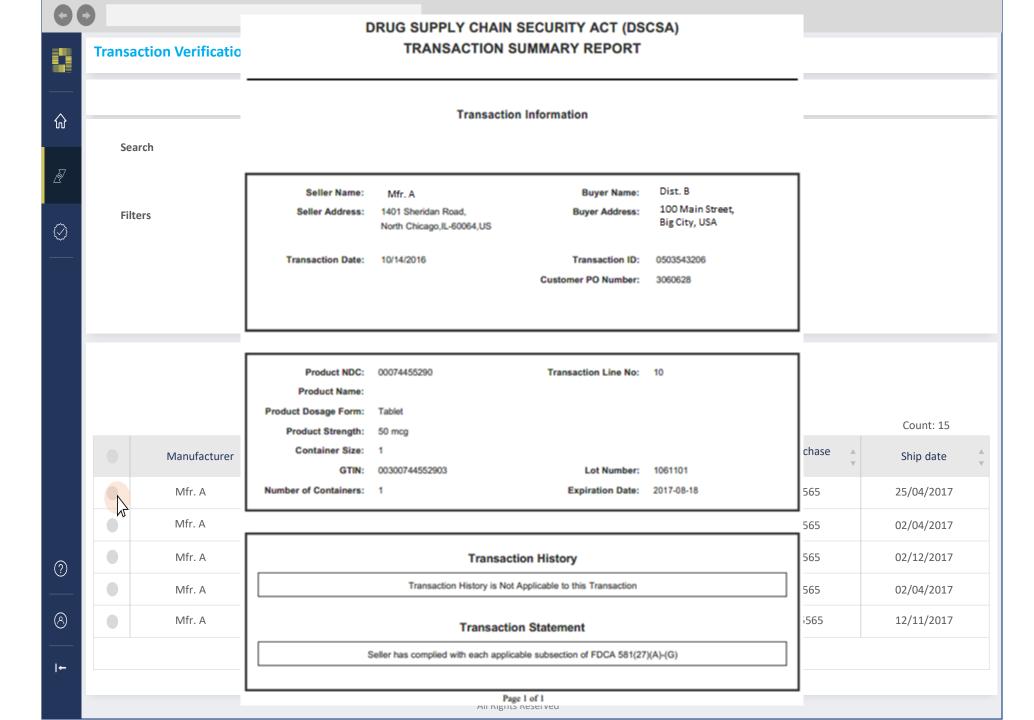




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Pilot Project Program under the Drug Supply Chain Security Act



Description: The FDA is required to establish one or more pilot projects, in coordination with authorized manufacturers, repackagers, wholesale distributors, and dispensers, to explore and evaluate methods to enhance the safety and security of the pharmaceutical distribution supply chain. Such projects shall build upon efforts, in existence as of the enactment date of the Drug Supply Chain Security Act (DSCSA) which was on November 27, 2013, to enhance the security of the pharmaceutical distribution supply chain, and consider any pilot projects conducted prior to enactment of the law. The project design will focus on utilizing the product identifier for product tracing; improving the technical capabilities of the supply chain; and identifying the system attributes that are necessary to implement the requirements established under the DSCSA. This project promotes patient safety by enhancing the security of the pharmaceutical distribution supply chain.

Milestone Description	Milestone Date	Milestone Status	Milestone Completion Date
1. Federal Register Notice announcing public workshop	February 2016	Completed	February 2016
2. Public Workshop	April 2016	Completed	April 2016
3. Establish Pilot Project Program	June 2016 (October 2016)	Completed	September 2017
4. Complete Pilot Project Program	September 2017 (January 2018)	Not Yet Started	TBD

We can execute a pilot

