USP <797>/<800> for California Oncology Practices

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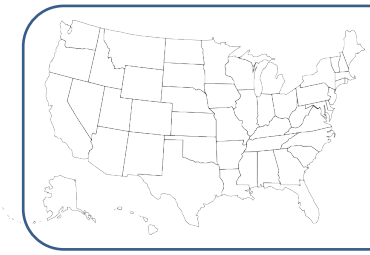
Two Related Issues for Oncologists

Sterile Compounding	Safe Handling of Hazardous Drugs
••Ensuring patients do not receive contaminated medicine	••Protecting workers from unintended occupational exposure to hazardous drugs
• New England Compounding Center meningitis outbreak	• Poor reproductive outcomes in nurses • Reports of health effects of occupational exposure

Overview

California Laws and Regulations



Issues on a Larger Scale

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California Sterile Compounding Legislation & Regulations

Senate Bill 294

- Signed by the Governor on October 4, 2013
- Requires pharmacies involved in sterile compounding to have a sterile compounding license from the Board of Pharmacy
- Requires the Board of Pharmacy to establish regulations and update them when national standards related to sterile compounding are updated

Board of Pharmacy Compounding Regulations

- Effective January 1, 2017
- Include requirements for sterile compounding of normal and hazardous drugs
- Do not require direct compliance with USP <797> or <800>, but instead have selected requirements from each chapter

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Do these Board of Pharmacy Regulations Apply to my Practice?

Ask your lawyer!

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Do these Board of Pharmacy Regulations Apply to my Practice?

Three Considerations

- Board of Pharmacy Jurisdiction
- Definition of Hazardous Drugs
- Definition of Compounding

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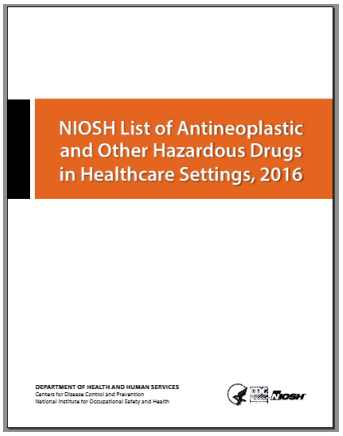
What is a Hazardous Drug?

- Drugs considered hazardous include those that exhibit one or more of the following six characteristics in humans or animals:
  - Carcinogenicity
  - Teratogenicity or other developmental toxicity
  - Reproductive toxicity
  - Organ toxicity at low doses
  - Genotoxicity
  - Structure and toxicity profiles of new drugs that mimic existing drugs determined hazardous by the above criteria



NIOSH [2016]. NIOSH list of antineoplastic and other hazardous drugs in healthcare settings, 2016. By Connor TH, MacKenzie BA, DeBord DG, Trout DB, O'Callaghan JP. Cincinnati, OH: U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Institute for Occupational Safety and Health, DHHS (NIOSH) Publication Number 2016-161 (Supersedes 2014-138).

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Unless you are in California…

The California Board of Pharmacy defines hazardous drugs as "all anti-neoplastic agents identified by the National Institute for Occupational Safety and Health (NIOSH) as meeting the criteria for a hazardous drug and any other drugs, compounds, or materials identified as hazardous by the pharmacist-in-charge."

California Board of Pharmacy Regulations 16 § 1735.1(r)

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What is Compounding?

"Compounding" means any of the following activities occurring in a licensed pharmacy, by or under the supervision of a licensed pharmacist, pursuant to a prescription:

(1) Altering the dosage form or delivery system of a drug

(2) Altering the strength of a drug

(3) Combining components or active ingredients

(4) Preparing a compounded drug preparation from chemicals or bulk substances

California Board of Pharmacy Regulations 16 § 1735(a)

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What is Compounding?

Focus on exclusions

FDA Pharmacy Compounding Statute	California Board of Pharmacy Regulations
As used in this section, the term "compounding" does not include mixing, reconstituting, or other such acts that are performed in accordance with directions contained in approved labeling provided by the product's manufacturer and other manufacturer directions consistent with that labeling.	"Compounding" does not include reconstitution of a drug pursuant to a manufacturer's direction(s)

21 USC 353a(f)
California Board of Pharmacy Regulations 16 § 1735(b)

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Overview of CA Board of Pharmacy Regulations

Compounding

- Self-Assessment
- Recordkeeping
- Labeling
- Policies and Procedures
- Facilities and Equipment
- Training of Staff
- Compounding Quality Assurance

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Overview of CA Board of Pharmacy Regulations

Compounding – Hazardous Drugs

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- Attire

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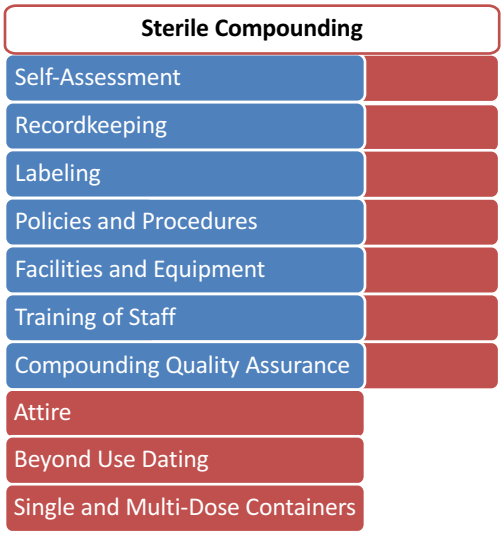
Overview of CA Board of Pharmacy Regulations



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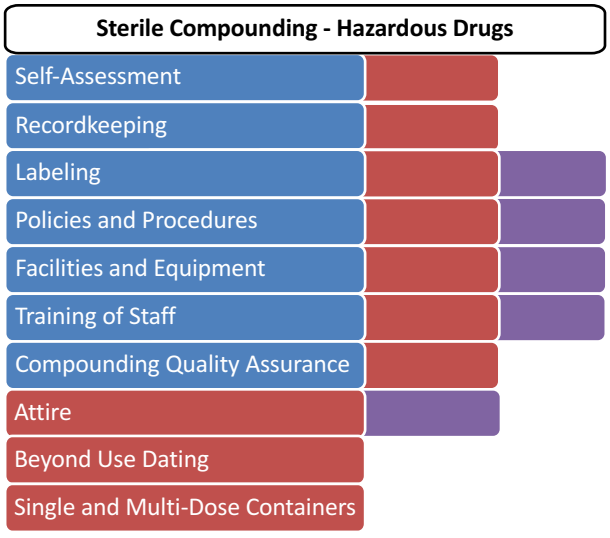
Overview of CA Board of Pharmacy Regulations



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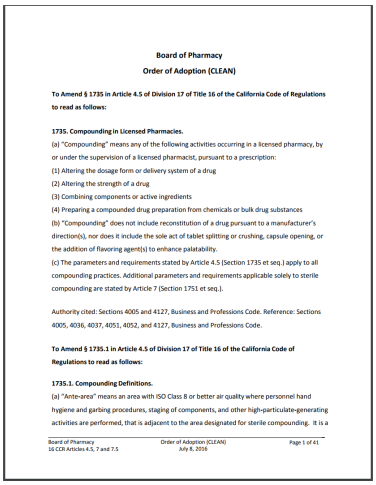
Board of Pharmacy Compounding Regulations



Board of Pharmacy

Order of Adoption (CLEAN)

To Amend § 1735 in Article 4.5 of Division 17 of Title 16 of the California Code of Regulations to read as follows:

1735. Compounding in Licensed Pharmacies.

(a) "Compounding" means any of the following activities occurring in a licensed pharmacy, by or under the supervision of a licensed pharmacist, pursuant to a prescription:

(1) Altering the dosage form or delivery system of a drug

(2) Altering the strength of a drug

(3) Combining components or active ingredients

(4) Preparing a compounded drug preparation from chemicals or bulk drug substances

(b) "Compounding" does not include reconstitution of a drug pursuant to a manufacturer's direction(s), nor does it include the sole act of tablet splitting or crushing, capsule opening, or the addition of flavoring agent(s) to enhance palatability.

(c) The parameters and requirements stated by Article 4.5 (Section 1735 et seq.) apply to all compounding practices. Additional parameters and requirements applicable solely to sterile compounding are stated by Article 7 (Section 1751 et seq.).

Authority cited: Sections 4005 and 4127, Business and Professions Code. Reference: Sections 4005, 4036, 4037, 4051, 4052, and 4127, Business and Professions Code.

To Amend § 1735.1 in Article 4.5 of Division 17 of Title 16 of the California Code of Regulations to read as follows:

1735.1. Compounding Definitions.

(a) "Ante-area" means an area with ISO Class 8 or better air quality where personnel hand hygiene and garbing procedures, staging of components, and other high-particulate-generating activities are performed, that is adjacent to the area designated for sterile compounding. It is a

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Highlights of CA Board of Pharmacy Regulations

- Pharmacy must establish policies and procedures for proper garbing when compounding with hazardous products.
- Pharmacy must establish procedures for handling, compounding and disposal of hazardous agents (including cleanups and spills).

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Highlights of CA Board of Pharmacy Regulations

- Hazardous drugs must be compounded in a biological safety cabinet (BSC)
  - HEPA filtered air in and out of cabinet
  - Must be externally vented
- BSC must be located in an externally ventilated, physically separated room
  - Negative pressure of between 0.01 to 0.03 inches of water column relative to all adjacent spaces
  - If beyond use date (BUD) > 12 hours - Cleanroom
    - ISO Class 7
    - 30 air changes per hour of HEPA-filtered supply air
  - If BUD < 12 hours – Segregated Compounded Area
    - 12 air changes per hour of HEPA-filtered supply air

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CA Board of Pharmacy Regulations

- Board of Pharmacy Regulations: http://www.pharmacy.ca.gov/laws_regs/1735_ooa_clean.pdf
- Regulation FAQs: http://www.pharmacy.ca.gov/publications/compounding_faqs.pdf

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Future Updates to CA Board of Pharmacy Regulations

Updates to USP <797> are expected as early as 2020

California law requires the Board of Pharmacy to update regulations when national sterile compounding standards are updated

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California Safe Handling Legislation & Regulations

Assembly Bill 1202

- Signed by the Governor on October 9, 2013
- Requires Occupational Safety and Health Standards Board to adopt standards for handling hazardous drugs
- These standards must be consistent with and not exceed recommendations adopted by NIOSH

Occupational Safety and Health Standards Board Proposed Regulations

- First Occupational Exposure to Antineoplastic Drugs advisory meeting hosted in June 2014
- Discussion draft of regulations released October 13, 2015
- Most recent Occupational Exposure to Antineoplastic Drugs advisory meeting hosted in October 2015.

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Will these Occupational Safety and Health Standards Board Regulations Apply to my Practice?

Yes!

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Highlights of Proposed Regulations

- Closed System Transfer Devices (CSTDs) must be used when compounding or administering antineoplastic drugs when the dosage form allows
- Comprehensive personal protective equipment (PPE) requirements
- Employers must establish a Medical Surveillance Program

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Status on Proposed OSHA Regulations

- Occupational Exposure to Antineoplastic Drugs Advisory Meetings: http://www.dir.ca.gov/dosh/doshreg/Antineoplastic-Drugs/

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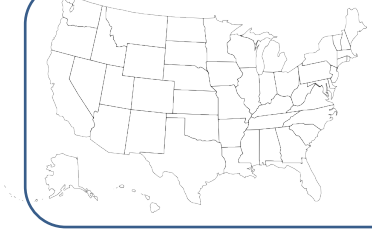
Overview

California Laws and Regulations



Issues on a Larger Scale

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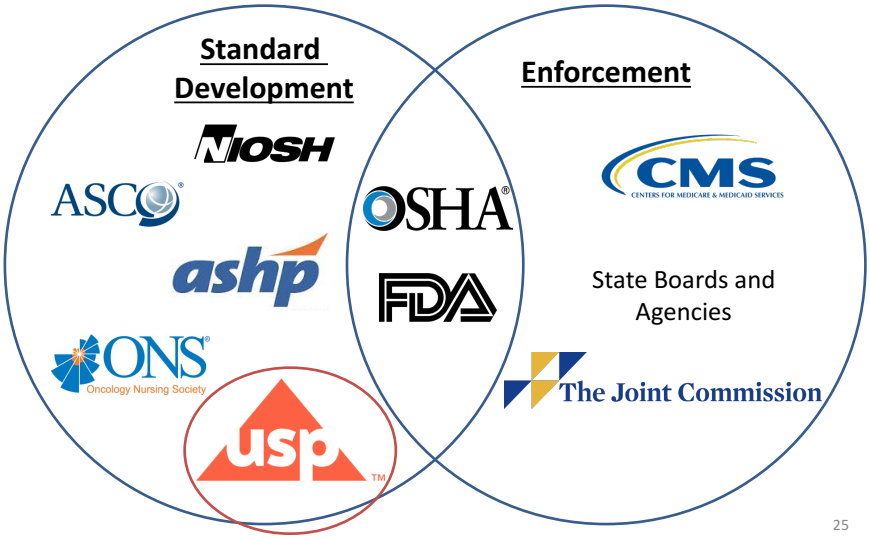
Who regulates sterile compounding and the safe handling of hazardous drugs?



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USP

- Nonprofit organization
- Develops standards for the strength, quality, purity, and consistency of medicines, food ingredients, dietary supplements, and ingredients
- Publishes the United States Pharmacopeia and the National Formulary

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USP Compounding Chapters

- USP <795> Pharmaceutical Compounding – Nonsterile Preparations
- USP <797> Pharmaceutical Compounding – Sterile Preparations
- USP <800> Hazardous Drugs – Handling in Healthcare Settings

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USP <797> Timeline

Original Chapter	••Published in June 2008
First Draft Revision	••Proposed revisions released September 2015 ••Comments accepted through January 2016
Second Draft Revision	••USP is currently developing the second draft and does not have a date for publication
Revised Chapter	••We have heard that the final chapter will not be published until 2020

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USP <800> Timeline

First Draft Chapter	••First draft chapter released May 2014 ••Comments accepted through July 2014
Second Draft Chapter	••Second, revised draft chapter released December 2014 ••Comments accepted through May 2015
Final Chapter	••Final chapter published February 2016 ••Chapter becomes “effective” July 2018

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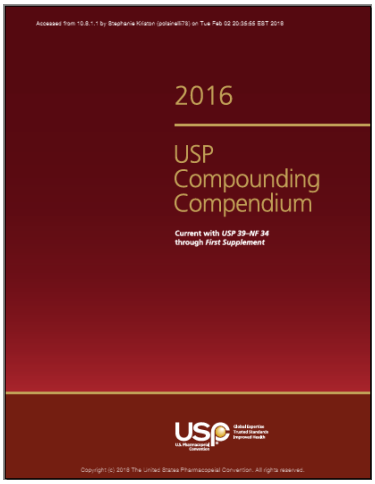
Where can I access USP <797> & <800>?

- Old draft versions of the chapters are available for free on USP’s website
- Final, official versions must be purchased from USP



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Most of the regulation in this area boils down to…

What happens at the state level

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Fragmented Approach to Developing Regulation

Official Standards

1. These are official standards for how things should be handled
2. In these standards we will define things and set forth requirements and recommendations for things
3. These standards are based off of evidence and are a cohesive document

First Section

1. This is the first section of the standards. We will cover the following topics:
    1. Stuff
    2. More stuff
    3. And even more stuff
2. This is a great section
3. Here is some information about how the standards should be implemented.
4. Here is some more information and details , including reference to an appendix

Second Section

1. This is the second section of the standards.

State Regulations

Preamble

These are official state regulations. We can make these regulations because we have statutory authority to do so.

Section A

This is the first section of the regulations. It contains definitions about a variety of things.

1. This is a great section. It contains a lot of useful information.
2. We really do think this a great section.

Section B

This section repeats section A, but this time the scope applies to someone different. It contains:

1. Stuff
2. More stuff
3. And even more stuff

Section C

This is the third section of the standard.

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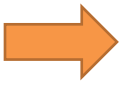

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Best Practices

Even if you are not legally beholden to the requirements of safe handling standards, protecting patient and worker safety should be a priority.

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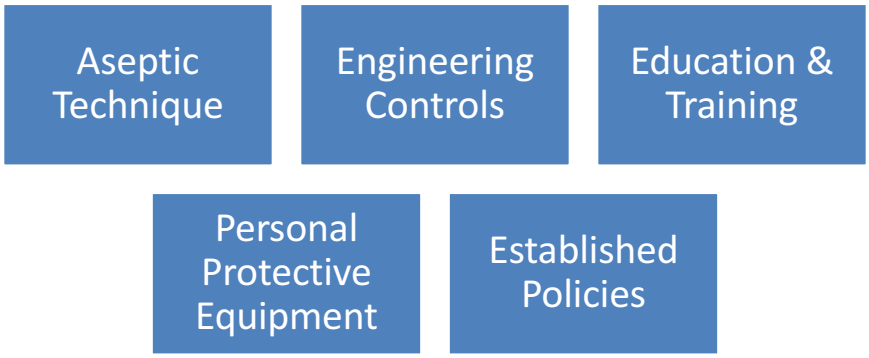
Elements of a Safe Handling Program



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ASCO Engagement/Advocacy

- Comments on USP <797> & <800> draft chapters
- Supporting State Affiliates in their work with state legislatures and regulators on standards that are appropriate for oncology practices
- Development of safe handling standards specifically for oncology practices
- Collaboration with other stakeholders on educational materials

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Questions?

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