

Day 1

August 24, 2023



STATE OF WASHINGTON
Pharmacy Quality Assurance Commission
PO Box 47852 – Olympia, Washington 98504-7852
Tel: 360-236-4030 – 711 Washington Relay Service

**Pharmacy Quality Assurance Commission Meeting
June 15, 2023 - Minutes**

Convene: Chair, Teri Ferreira called the meeting to order June 15, 2023, 12:10 PM.

Commission Members:

Teri Ferreira, RPh, Chair
Jerrie Allard, Public Member, Vice Chair
Uyen Thorstensen, CPhT (*Joined at 12:34 PM*)
Hawkins DeFrance, Nuclear Pharmacist
Craig Ritchie, RPh, JD
Patrick Gallaher, BS, BPharm, MBA, MPH
Judy Guenther, Public Member
Timothy Lynch, PharmD, MS, FABC, FASHP
Matthew Ray, PharmD
Ken Kenyon, PharmD, BCPS
Ann Wolken, PharmD, RPh
William Hayes, PharmD CCHP

Staff:

Marlee O’Neill, Executive Director
Lindsay Trant-Sinclair, Deputy Director
Christopher Gerard, AAG
Irina Tiginyanu, Pharmacy Technician Consultant
Kseniya Efremova, Policy Analyst
Joshua Munroe, Legislative and Rules Consultant
Taifa “Nomi” Peaks, Pharmacist Consultant
Haleigh Mauldin, Program Consultant
Si Bui, Pharmacist Inspector Supervisor
Joanne Miller, Program Manager
Desire Gudmundson, Administrative Support
Amy L Robertson, Communications Coordinator
and Program Support

Commission Members Absent:

Bonnie Bush, Public Member

1. Call to Order Terri Ferreira, Chair. 12:10 PM

1.1 Meeting Agenda Approval – June 15, 2023

MOTION: Craig Ritchie moved to approve the business meeting agenda for June 15, 2023. Ken Kenyon, second. Motion carried, 11:0.

1.2 Meeting Minutes Approval – May 4, 2023

MOTION: Craig Ritchie moved to approve the meeting minutes for May 4, 2023. Ken Kenyon, second. Motion carried, 11:0.

1.3 Meeting Minutes Approval – May 5, 2023

MOTION: Craig Ritchie moved to approve the meeting minutes for May 5, 2023. Ken Kenyon, second. Motion carried, 11:0.

2. Consent Agenda

2.1 National Precursor Log Exchange Monthly Dashboard – May 2023

2.2 Pharmaceutical Firms Application Report

2.3 Ancillary Utilization Plans Approval

- 2.3.1** CHAS
- 2.3.2** Bellegrove Pharmacy
- 2.3.3** Confluence Health
- 2.3.4** Infusion Solutions
- 2.3.5** Madison Park Pharmacy
- 2.3.6** Makers Compounding Pharmacy
- 2.3.7** Acts Pharmacy
- 2.3.8** Genoa Pharmacy – multiple locations

2.4 Pharmacy Technician Training Program Approval

- 2.4.1** Infusion Solutions
- 2.4.2** Maker’s Compounding Pharmacy
- 2.4.3** Sid’s Pharmacy
- 2.4.4** South Gate Pharmacy

2.5 Regular Agenda/Items Pulled from 2.1 and 2.2

Items pulled:

- 2.3.1 CHAS
- 2.4.4 South Gate Pharmacy

Recusals:

Ann Wolken: 2.3.8 Genoa Pharmacy – multiple locations

MOTION: Craig Ritchie moved to approve item 2.3.8 Genoa Pharmacy – multiple locations. Ken Kenyon, second. Motion carried, 10:0. (Ann Wolken – recused).

MOTION: Craig Ritchie moved to approve all remaining consent agenda items except for items 2.3.1 CHAS and 2.4.4 South Gate Pharmacy. Ken Kenyon, second. Motion carried, 11:0.

(Uyen Thorstensen joins the meeting)

MOTION: Craig Ritchie moved to approve 2.3.1 CHAS. Ken Kenyon, second. Motion carried: 12:0.

MOTION: Craig Ritchie moved to approve 2.4.4 South Gate Pharmacy contingent upon the addition of the language that records must be readily available upon 72 hours of request. William Hayes, second. Motion carried, 12:0.

3. Old Business

3.1 Enforcement Discretion – WAC 246-945-585 (1)(b) Zero Reports

The commission has utilized its enforcement discretion on the zero order reports requirement in WAC 246-945-585. Lindsay Trant-Sinclair provided a summary stating that at the July 14, 2022 business meeting, the commission voted “to extend enforcement discretion of the submission of zero reports for 12 months (until July 14, 2023) or until the rulemaking is complete, whichever

comes first.” The rulemaking on this WAC is still ongoing. The facility subcommittee discussed the rule on March 30, 2023, and staff have since drafted the rule language.

Staff recommend that the commission continue utilizing its enforcement discretion on WAC 246-945-585(1)(b) until the rulemaking on WAC 246-945-585 is complete.

MOTION: Craig Ritchie moved to extend the enforcement discretion of WAC 246-945-585(1)(b) until the rulemaking on WAC 246-945-585 is complete. Ken Kenyon, second. Motion carried, 12:0.

3.2 Pharmacy Assistants Stocking

Taifa “Nomi” Peaks presented an SBAR and draft FAQ for the commission’s consideration related to pharmacy assistants stocking.

MOTION: Timothy Lynch moved to have staff file a CR-101 to define “stocking” and the use of technology as it relates to pharmacy assistants and potentially amend WAC 249-945-001 and/or WAC 245-945-315, and to add a new section to Chapter 246-945 WAC. Hawkins DeFrance, second. Motion carried, 12:0.

4. New Business

4.1 HCE FAQ

In an effort to address broader questions related to Health Care Entities (HCEs), program staff created an FAQ page to be considered by the commission for approval. The questions are organized by subtopic and the answers include hyperlinks to pertinent rules references.

MOTION: Ken Kenyon moved to approve the HCE FAQ with the edits as discussed. Craig Ritchie, second. Motion carried, 12:0.

4.2. Review Joint Operating Agreement (JOA)

In accordance with Section 15 of the JOA, the commission is required to review the JOA prior to the end of each biennium. The JOA also states that “[t]he agreement may be revised when necessary upon the request and mutual agreement of the secretary and the commission.”

MOTION: Ken Kenyon moved to open the JOA to make organizational updates needed to reflect the current state which includes the inspectors being a part of the Office of Health Professions. Judy Guenther, second. Motion carried, 12:0.

4.3 FDA Proposes Easy-to-Read Medication Guide

On May 30, 2023, the FDA announced it is proposing an easy-to-read medication guide for patients called “Patient Medication Information.” This represents an opportunity for commission input on a topic related to some of their own rulemaking.

Joshua Munroe briefed the commission on the proposal and presented the commission with the option on whether to submit a written comment to the FDA regarding the easy-to-read medication guide proposal.

MOTION: William Hayes moved to have staff to assist the commission with providing written comments regarding translation for alternate languages and for ensuring those who are visually impaired are also able to access the medication guides. Ken Kenyon, second. Motion carried. 12:0.

4.4 Emergent Drug Shortages.

Lindsay Trant-Sinclair provided information on how the recent drug shortages relate to commission's regulatory framework and the aspects of the commission's rules that may alleviate some of the impact in Washington relating to the transfer of drug supply.

5. Panel Review – Study Plan [Panel B – Craig Ritchie, Hawkins DeFrance, Matthew Ray, Timothy Lynch, Bonnie Bush (absent)]

MOTION: Ken Kenyon moved to delegate the study plan to Panel B. Jerrie Allard, second. Motion carries, 12:0.

(The main body of the commission will reconvene c. 3:15 PM)

5.1 . PHRM.PH.61323767

MOTION: Hawkins DeFrance moved to approve the study plan. Craig Ritchie, second. Motion carried, 4:0.

5.2 PHRM.PH.61176247

MOTION: Hawkins DeFrance moved to approve the study plan. Craig Ritchie, second. Motion carried, 3:0. (Timothy Lynch, absent.)

5.3 PHRM.PH.61314820

MOTION: Hawkins DeFrance moved to approve the study plan. Craig Ritchie, second. Motion carried, 3:0. (Timothy Lynch, absent.)

5.4 PHRM.PH.61322712

Presenter did not attend meeting.

6. Rules and Legislative Updates

6.1 Rules Workshop: Suspicious Orders and Zero Reports

In June 2021 the commission authorized staff to file a CR-101 to amend WAC 246-945-585 regarding suspicious orders and zero reports. The CR-101 was filed in April 2023 and staff has begun drafting rule language for commission approval and comment.

Haleigh Mauldin presented the proposed rule language.

In summary, the draft language defines “suspicious order” and changes the procedure for zero order reporting. This draft focuses on submitting a suspicious order when the wholesaler refuses to ship controlled substances or drugs of concern after conducting due diligence. It includes a

separate provision on reporting to the commission when a wholesaler refuses to onboard a new customer. Staff will bring this back to the August meeting to allow stakeholders additional time to review the draft.

6.2 Rules Workshop: Remote Dispensing of OUD Medications (SSB 6086)

Commission staff presented a rule language draft on remote OUD dispensing sites for the commission's approval at the May 2023 business meeting. Though the commission accepted the proposed language, legislative actions since that time prompted commission staff to amend the draft language and present it again.

MOTION: Craig Ritchie moved to accept the proposed language changes for the remote OUD dispensing site rulemaking project and allow staff to proceed with the CR-102. Ken Kenyon, second. Motion carried, 12:0.

6.3 CR-101 Scope Expansion: Mobile Opioid Treatment Program Licensing

Item 6.3 was removed from the agenda.

MOTION: Jerrie Allard moved to address the June 16 agenda items 4 and 5 during today's agenda. William Hayes, second. Motion carried, 12:0.

Agenda item 4 became the June 15, 2023 agenda item 8 pertaining to commission member reports. Action item 8.1, formerly 4.1 on the June 16, 2023 agenda, includes a report delivered by the Compounding Subcommittee.

Agenda item 5 became the June 15, 2023 agenda item 9 for staff reports.

7. Open Forum

8. Commission Member Reports

8.1 Compounding Subcommittee – Hawkins DeFrance, Subcommittee Chair

Since the last business meeting in May, the compounding subcommittee has held several meetings to discuss revisions to the draft USP <795> and USP <797> self-inspection worksheets for nonsterile and sterile compounding, respectively. As a reminder, the commission tasked the subcommittee with reviewing the worksheets in preparation for November 1, 2023, when the revised USP General Chapters <795> and <797> are scheduled to become official. We appreciate the input from our stakeholders on this project and look forward to presenting the worksheets to the commission in August.

9. Staff Reports

9.1 Executive Director - Marlee O' Neill

Commission staff have inquired whether the HELMS project can configure provider credential search to allow people to see whether a nonresident pharmacy has attested that it does not compound. Marlee shared her experience at the NABP annual meeting. Inspector Lisa Roberts' last day with DOH was May 31. Marlee informed the commission that ESHB 1503 requires the

collection of demographic information. OHP will likely hold listening sessions as it plans for the implementation of this bill.

9.2 Deputy Director - Lindsay Trant-Sinclair

Staff extended an informal offer to a non-permanent HSC4, a 7-month appointment to help get caught up with rules and stay on top of non-routine applications. Staff received additional applications for pharmacist commission members and are continuing interviews. The budget subcommittee did not meet this month due to a schedule conflict but will resume in August.

9.3 Pharmacist Consultant -Taifa “Nomi” Peaks

Nothing to report.

9.4 Pharmacist Inspector Supervisor - Si Bui

Si Bui was introduced to the commission as the new pharmacy inspector supervisor. He briefly shared his public health background, previous pharmacy experiences, and motivations for joining the commission staff.

9.5 Assistant Attorney General - Christopher Gerard

Nothing to report.

10. Rules Workshop: Accessible Labeling

Joshua Munroe provided the commission with background information on the draft. Commission staff updated the accessible labeling rule language draft based on commission discussion from the May 2023 business meeting. Among the items discussed was a determination of what prescription label elements must be made accessible to visually impaired, print disabled, and Limited English Proficient (LEP) patients. That information is provided in a separate document with a visual of the prescription information elements provided to a patient by category: written translation, oral interpretation, print disability, and vision impairment.

Additional columns representing federal requirements for the same elements are present because understanding this rulemaking process at this stage requires an understanding of the existing federal requirements relating to entities – including pharmacies – providing accessibility services to patients. These federal requirements include, but are not necessarily limited to, Title VI of the Civil Rights Act of 1964, the Rehabilitation Act of 1973, and Title III of the Americans with Disabilities Act. Today’s rule language draft was prepared with both the commission’s input and these federal laws in mind.

Commissioners reviewed the draft, provided feedback, and listened to stakeholder feedback. The commission ran out of time to complete the rules workshop and elected to resume the workshop at the business meeting on June 16, 2023.

11. Summary of Meeting Action Items

- 2.3 and 2.4. Staff will follow up with approvals and contingent approvals for AUPs and technician training programs.

- 3.1 Staff will send out a GovDelivery to communicate that the commission extended its use of enforcement discretion on WAC 246-945-585(1)(b) until rulemaking is complete.
- 3.2 Staff will file a CR-101 to amend WAC 246-945-001, 246-945-315, and add new sections in Chapter 246-945 WAC related to the definition of stocking, the assistants' scope of practice, and the use of technology. Pharmacy practice subcommittee will work on drafting rule language after CR-101 is filed.
- 4.1 Staff will post the HCE FAQs as edited here today to the commission's website and distribute them through GovDelivery.
- 4.2 Make edits to JOA to update and correct terms and begin negotiation process with Department. Staff will also bring aspects of the JOA that have been put aside, back to the commission for awareness and review.
- Staff will draft comments to submit to the FDA on their rulemaking requesting that the FDA requires manufacturers to translate medication guides in languages other than English as well as make accommodations to those who are vision impaired. Staff will bring the draft comment back at a future meeting for the commission to review.
- 5. Staff will communicate study plan approvals to credentialing.
- 6.1 Staff will bring back the draft language on suspicious orders back at a future meeting.
- 6.2 Staff will proceed with filing the CR-102 with the amended language for the remote dispensing sites for opioid use disorder medications and schedule the public hearing.
- Commissioner open discussion: Staff will send out updated guidance on administering and ordering the COVID vaccine under the extension of the PREP Act via GovDelivery when complete.

Teri Ferreira thanked all of commissioners, staff, licensees, and stakeholders for their preparation and participation in PQAC business meetings.

Business Meeting Adjourned

Teri Ferreira, Chair, called the meeting adjourned at 4:23 PM.



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**Pharmacy Quality Assurance Commission Meeting
June 16, 2023 - Minutes**

Convene: Chair, Teri Ferreira called the meeting to order on June 16, 2023, 9:07 AM.

Commission Members:

Teri Ferreira, RPh, Chair
Jerrie Allard, Public Member, Vice Chair
Uyen Thorstensen, CPhT
Hawkins DeFrance, Nuclear Pharmacist
Craig Ritchie, RPh, JD
Patrick Gallaher, BS, BPharm, MBA, MPH
Judy Guenther, Public Member
Tim Lynch, PharmD, MS, FABC, FASHP
Matthew Ray, PharmD
Ken Kenyon, PharmD, BCPS
Ann Wolken, PharmD, RPh
William Hayes, PharmD CCHP

Commission Members Absent:

Bonnie Bush, Public Member

Staff:

Marlee O’Neill, Executive Director
Lindsay Trant-Sinclair, Deputy Director
Christopher Gerard, AAG
Keegan Curry, Project Manager
Irina Tiginyanu, Pharmacy Technician Consultant
Kseniya Efremova, Policy Analyst
Joshua Munroe, Legislative and Rules Consultant
Taifa “Nomi” Peaks, Pharmacist Consultant
Haleigh Mauldin, Program Consultant
Si Bui, Pharmacy Inspector Supervisor
Joanne Miller, Program Manager
Desire Gudmundson, Administrative Support
Amy L Robertson, Communications Coordinator
and Program Support

1. Call to Order Terri Ferreira, Chair

1.1 Meeting Agenda Approval – June 16, 2023

MOTION: Craig Ritchie moved to amend the agenda to remove items 4 and 5, and to add the Rules Workshop on Accessible Labeling. Ken Kenyon, second. Motion carries, 12-0.

2. Leadership Elections

The commission elected leadership for 2023-2024.

MOTION: Tim Lynch moved to accept Ken Kenyon’s nomination as Chair for the Washington State Pharmacy Quality Assurance Commission effective July 1, 2023. Jerrie Allard, second. Motion carries, 12:0

MOTION: Tim Lynch moved to accept Hawkin DeFrance’s nomination for Vice Chair for the Washington State Pharmacy Quality Assurance Commission effective July 1, 2023. Judy Guenther, second. Motion carries, 12:0.

3. Accessible Labeling Rules Workshop

The commission continued to review, discuss, and refine the draft rule language. This included input from stakeholders and staff. Staff will revise the draft rule language, provide that draft to stakeholders for feedback, and schedule a special meeting prior to the August business meeting to hold another rules workshop.

4. Strategic Planning

Led by Keegan Curry, the commission continued its strategic planning session and focused on identifying and developing its goals.

5. Summary of Meeting Action Items

- The Chair and Vice-Chair duties will shift to Ken and Hawkins beginning July 1, 2023.
- Staff will revise draft accessible labeling rule language and schedule a special meeting.
- Continue strategic planning, including work on the bylaws at a future meeting.
- Bring back information to the commission on the considerations of becoming a partner commission.
- Staff will provide information on how the commission interacts with the Department's legislative process.
- Look into continuing Department presence at commission meetings in accordance with the JOA.

Teri Ferreira thanked all of commissioners, staff, licensees, and stakeholders for their preparation and participation in PQAC business meetings.

Business Meeting Adjourned

Teri Ferreira, Chair, called the meeting adjourned at 2:11 PM.



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**Pharmacy Quality Assurance Commission Special Meeting
July 25, 2023 - Minutes**

Convene: Ken Kenyon called the meeting to order at 10:32 a.m., July 25, 2023.

Commission Members:

Ken Kenyon, PharmD, BCPS; Chair
Hawkins DeFrance, Nuclear Pharmacist, Vice Chair
Jerrie Allard, Public Member
Teri Ferreira, RPh
Patrick Gallaher, BS, BPharm, MBA, MPH
Judy Guenther, Public Member
Matthew Ray, PharmD
Craig Ritchie, RPh, JD
Uyen Thorstensen, CPhT
Ann Wolken, PharmD, RPh

Staff:

Marlee O’Neill, Executive Director
Lindsay Trant-Sinclair, Deputy Director
Christopher Gerard, Assistant Attorney General
Joshua Munroe, Legislative and Rules Consultant
Taifa “Nomi” Peaks, Pharmacist Consultant
Si Bui, Pharmacist Inspector Supervisor
Julia Katz, Program Consultant
Amy L Robertson, Communications Coordinator and
Program Support

Commission Members Absent:

Bonnie Bush, Public Member
William Hayes, PharmD CCHP
Timothy Lynch, PharmD, MS, FABC, FASHP

1. **Call to Order Ken Kenyon. 10:32 a.m.**
2. **Accessible Labeling Rules Workshop**

Commission staff updated the accessible labeling rule language draft based on the commission discussion from the June 2023 business meeting. Among the items discussed were the definitions of core terms as presented in WAC 246-945-AAA, which labels should be exempted from the proposed accessibility provisions, and the tools used by the commission to develop the required signage that dispensing facilities and dispensing practitioners must post.

Commissioners reviewed the draft language, heard stakeholder feedback, and discussed edits to the current draft.

MOTION: Hawkins DeFrance moved to accept the draft language and proposed edits made during the meeting and authorized staff to file a CR-102. Craig Ritchie, second. Motion carries, 10:0.

Special Meeting Adjourned. Ken Kenyon, Chair, called the meeting adjourned at 12:55 PM.

2.1.1 - National Precursor Log Exchange Monthly Dashboard- June- July 2023

From: [Compliance](#)
To: [Weimer, Jamie](#); [DOH WSPOAC](#); [Miller, Joanne \(DOH\)](#)
Cc: [krista.mccormick@equifax.com](#); [Accountspecialist@appriss.com](#); [alex.vance@equifax.com](#)
Subject: Washington NPLEx Dashboard Report - Jul 2023
Date: Tuesday, August 1, 2023 4:56:25 AM
Attachments: [WA PHARMACY TRX REPORT 07012023.csv](#)

External Email

MONTHLY PROGRAM ADMINISTRATOR'S DASHBOARD

4 Logins - 0 Searches - 0 Report Queries - 21 Active Watches - 0 Active Watch Hits

NEW USERS THIS MONTH

New Users = 0
 Total Accounts = 144
 Active Users = 2

TOP USAGE AGENCIES

TOP USERS BY USAGE

TOP AGENCIES BY ACTIVE WATCHES

1. ICE - King County (28)

TRANSACTION SUMMARY STATISTICS (2023)

	JAN	FEB	MAR	APR	MAY	JUN	JUL	TOTAL
PURCHASES	71,650	69,842	81,463	75,970	78,412	79,249	64,423	521,009
BLOCKS	3,237	3,382	3,985	3,657	4,049	4,169	3,161	25,640
GRAMS SOLD	149,571	145,519	177,064	166,664	180,078	181,015	147,213	1,147,124
BOXES SOLD	81,434	79,115	91,959	86,273	88,279	89,812	73,523	590,395
GRAMS BLOCKED	8,604	8,664	10,706	9,791	11,005	11,827	8,815	69,412
BOXES BLOCKED	3,774	3,863	4,516	4,164	4,507	4,775	3,744	29,343
AVG GRAMS PER BOX BLOCKED	2.28	2.24	2.37	2.35	2.44	2.48	2.35	2.36

PHARMACY PARTICIPATION STATISTICS (Jul 2023)

Enabled Pharmacies	1000
Pharmacies Submitting a Transaction	921
Pharmacies Logging in Without a Transaction	1
Inactive Pharmacies	78
Pharmacy Participation for Jul	92.2%

DISCLAIMER: This is an automated report meant to give you a quick snapshot of the NPLeX system in your state. The statistics listed in this report are only meant to be a general overview and not necessarily the exact final numbers. Prior to releasing any statistics mentioned in this report, we highly recommend that you verify the numbers with your NPLeX customer relationship manager. For questions or issues, please contact krista.mccormick@equifax.com.

From: [Compliance](#)
To: [Weimer, Jamie](#); [DOH WSPQAC](#); [Miller, Joanne \(DOH\)](#)
Cc: [krista.mccormick@equifax.com](#); [Accountspecialist@appriss.com](#); [alex.vance@equifax.com](#)
Subject: Washington NPLEx Dashboard Report - Jun 2023
Date: Saturday, July 1, 2023 5:14:19 AM
Attachments: [WA PHARMACY TRX REPORT_06012023.csv](#)

External Email

MONTHLY PROGRAM ADMINISTRATOR'S DASHBOARD

2 Logins - 0 Searches - 0 Report Queries - 21 Active Watches - 0 Active Watch Hits		
<p>NEW USERS THIS MONTH</p> <p>New Users = 0</p> <p>Total Accounts = 144</p> <p>Active Users = 1</p>	<p>TOP USAGE AGENCIES</p> <p>TOP USERS BY USAGE</p>	<p>TOP AGENCIES BY ACTIVE WATCHES</p> <p>1. ICE - King County (28)</p>

TRANSACTION SUMMARY STATISTICS (2023)							
	JAN	FEB	MAR	APR	MAY	JUN	TOTAL
PURCHASES	71,650	69,842	81,463	75,970	78,412	79,249	456,586
BLOCKS	3,237	3,382	3,985	3,657	4,049	4,169	22,479
GRAMS SOLD	149,571	145,519	177,064	166,664	180,078	181,015	999,911
BOXES SOLD	81,434	79,115	91,959	86,273	88,279	89,812	516,872
GRAMS BLOCKED	8,604	8,664	10,706	9,791	11,005	11,827	60,597
BOXES BLOCKED	3,774	3,863	4,516	4,164	4,507	4,775	25,599
AVG GRAMS PER BOX BLOCKED	2.28	2.24	2.37	2.35	2.44	2.48	2.36

PHARMACY PARTICIPATION STATISTICS (Jun 2023)	
Enabled Pharmacies	1000
Pharmacies Submitting a Transaction	923
Pharmacies Logging in Without a Transaction	0
Inactive Pharmacies	77
Pharmacy Participation for Jun	92.3%

DISCLAIMER: This is an automated report meant to give you a quick snapshot of the NPLeX system in your state. The statistics listed in this report are only meant to be a general overview and not necessarily the exact final numbers. Prior to releasing any statistics mentioned in this report, we highly recommend that you verify the numbers with your NPLeX customer relationship manager. For questions or issues, please contact krista.mccormick@equifax.com.

2.1.2 - Pharmaceutical Firms Application Report

Pharmaceutical Firms Application Report

Credential #	Status	Expiration Date
PHHC.FX.60779170	CLOSED	06/01/2023
PHAR.CF.60438040	CLOSED	06/08/2023
PHHC.FX.60824854	CLOSED	06/08/2023
PHHC.FX.60563419	CLOSED	06/09/2023
PHWH.FX.61139020	CLOSED	06/09/2023
PHAR.CF.00057212	CLOSED	06/13/2023
PHAR.CF.00004307	CLOSED	06/13/2023
PHAR.CF.61223512	CLOSED	06/13/2023
PHNR.FO.60563134	CLOSED	06/13/2023
PHNR.FO.60872343	CLOSED	06/13/2023
PHAR.CF.60544033	CLOSED	06/14/2023
DRSD.FX.61106721	CLOSED	06/15/2023
PHWH.FX.61106720	CLOSED	06/15/2023
PHWH.FX.61108303	CLOSED	06/16/2023
PHWH.FX.60411279	CLOSED	06/16/2023
PHWH.FX.60411281	CLOSED	06/16/2023
PHWH.FX.60411288	CLOSED	06/16/2023
PHWH.FX.60411283	CLOSED	06/16/2023
PHWH.FX.60411282	CLOSED	06/16/2023
PHHC.FX.60639852	CLOSED	06/17/2023
PHWH.FX.00056792	CLOSED	06/20/2023
PHWH.FX.60999920	CLOSED	06/22/2023
PHNR.FO.61225897	CLOSED	06/27/2023
PHAR.CF.60365589	CLOSED	06/28/2023
PHHC.FX.60880093	CLOSED	06/30/2023
PHHC.FX.60880062	CLOSED	06/30/2023
PHHC.FX.60880054	CLOSED	06/30/2023
PHHC.FX.60880056	CLOSED	06/30/2023
PHHC.FX.60879490	CLOSED	06/30/2023
PHHC.FX.60880063	CLOSED	06/30/2023
PHHC.FX.60879499	CLOSED	06/30/2023
PHWH.FX.00059255	CLOSED	06/30/2023
PHNR.FO.61157085	CLOSED	07/08/2023
PHNR.FO.60975798	CLOSED	07/08/2023
PHAR.CF.00004729	CLOSED	07/14/2023
PHNR.FO.61140037	CLOSED	07/14/2023
PHWH.FX.60441915	CLOSED	07/14/2023
PHHC.FX.60745562	CLOSED	07/19/2023
PHWH.FX.61065015	CLOSED	07/20/2023
DRCS.FX.61325797	CLOSED	07/21/2023
PHNR.FO.60550867	CLOSED	07/24/2023
DRSD.FX.61346225	CLOSED	07/27/2023
PHHC.FX.60537206	CLOSED	07/27/2023
PHWH.FX.60416893	CLOSED	07/27/2023
PHWH.FX.60494175	CLOSED	07/27/2023

DRAN.FX.00002720	CLOSED	07/31/2023
PHAR.CF.60450621-HOSP	CLOSED	07/31/2023
PHAR.CF.60428831-HOSP	CLOSED	07/31/2023
PHNR.FO.60834979	CLOSED	07/31/2023
PHHC.FX.60506557	CLOSED	08/01/2023
PHHC.FX.60907177	CLOSED	08/01/2023
PHWH.FX.00005306	CLOSED	08/01/2023
PHHC.FX.00058567	CLOSED	08/04/2023
PHWH.FX.61289302	CLOSED	08/07/2023
PHWH.FX.61013214	CLOSED	08/07/2023
PHAR.CF.60515586	CLOSED	08/08/2023
PHNR.FO.60764404	CLOSED	08/11/2023
PHNR.FO.60391487	CLOSED	08/14/2023
PHWH.FX.60349257	CLOSED	08/16/2023

2.1.3 - 2024 Proposed Business Meeting Dates

Last meeting of 2023: December 14-15, 2023

2024 proposed commission meeting dates

February 1, 2024

March 7-8, 2024

May 2-3, 2024

June 27-28, 2024

August 22-23, 2024

October 10-11, 2024

December 12-13, 2024



Read this page carefully

**WA Pharmacy Quality Assurance Commission
Pharmacy Self-Inspection Worksheet
2023 USP <795> – Nonsterile Compounding Addendum**

Attention: Responsible Pharmacy Manager or Equivalent Manager

Washington law holds the responsible manager (or equivalent manager) and all pharmacists on duty responsible for ensuring pharmacy compliance with all state and federal laws governing the practice of pharmacy. Failure to complete this report within the month of March and within 30 days of becoming responsible manager (as required by WAC 246-945-005) may result in disciplinary action. **The following addendum is required to be filled out and kept on file with the General Pharmacy or Hospital Pharmacy Self-Inspection Worksheet. Do not send to the commission office.**

The primary objective of this report, and your self-inspection, is to provide an opportunity to identify and correct areas of non-compliance with state and federal law. This worksheet does not replace U.S. Pharmacopeia (USP) <795> Pharmaceutical Compounding – Nonsterile Preparations. (**Note:** Neither the self-inspection nor a commission inspection evaluates your complete compliance with all laws and rules of the practice of pharmacy.)

By answering the questions and referencing the appropriate laws/rules/CFR provided, you can determine whether you are compliant with many of the rules and regulations. If you have corrected any deficiencies, please write “corrected” and the date of correction by the appropriate question.

Date responsible manager/change of responsible manager inspection was performed: [Click or tap to enter a date.](#)

Signature of responsible pharmacy manager: [Click or tap here to enter text.](#)

Questions highlighted in **blue** are questions that will be focused on during routine pharmacy inspections.

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General Rule Reference - Applies to all questions through worksheet.

RCW 18.64.270(2) "Any medicinal products that are compounded for patient administration or distribution to a licensed practitioner for patient use or administration shall, at a minimum, meet the standards of the official United States pharmacopeia as it applies to nonsterile products and sterile administered products."

The following practices are **NOT** considered compounding and are **NOT** required to meet the requirements of this chapter.
 Handling of nonsterile HDs should additionally comply with (800). Refer to facility SOPs for additional safe practices (e.g., labeling).
 Nonsterile radiopharmaceuticals: Compounding of nonsterile radiopharmaceuticals is subject to the requirements in Radiopharmaceuticals—Preparation, Compounding, Dispensing, and Repackaging (825).
 Reconstitution: Reconstitution of a conventionally manufactured nonsterile product in accordance with the directions contained in the manufacturer approved labeling
 Repackaging: Repackaging of conventionally manufactured drug products (see Good Repackaging Practices (1178) for recommendations)
 Splitting tablets: Breaking or cutting a tablet into smaller portions
 Administration: Preparation of a single dose for a single patient when administration will begin within 4 hours. This includes crushing a tablet(s) or opening a capsule(s) to mix with food or liquids to facilitate patient dosing.

Please Note: When determining compliance with a question that has multiple requirements, if the facility is NOT compliant with any single requirement in the question check the "No" compliance box. Include an explanation of which part is noncompliant in the "Notes/Corrective Actions" column. Checking the "Yes" compliance box indicates compliance with all requirements in a question.

Does the pharmacy engage in compounding with hazardous drugs?
 If yes, you must also complete the 2023 USP 800 – Hazardous Drugs Addendum

Compliant			#	Rule Reference	Notes/Corrective Actions
Yes	No	N/A			
Designated Person(s)					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	01.	Does the compounding facility have a designated person or persons responsible for the performance and operation of the facility and personnel? ***Enter the name of the designated person(s) in the Notes/Corrective Actions field	USP <795> - 1.1.4 Oversight by designated person(s) "The compounding facility must designate one or more individuals to be responsible and accountable for the performance and operation of the facility and personnel for the preparation of CNSPs." Click or tap here to enter text.

Compliant			#		Rule Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D2.	Does the designated person maintain oversight of SOPs, personnel training, component selection, compounding activities, handling and storage?	USP <795> - 1.1.4 Oversight by designated person(s) The responsibilities of the designated person(s) include but are not limited to: -Overseeing a training program to ensure competency of personnel involved in compounding, handling, and preparing CNSPs -Selecting components -Monitoring and observing compounding activities and taking immediate corrective action if deficient practices are observed -Ensuring that standard operating procedures (SOPs) are fully implemented. The designated person(s) must ensure that follow-up is carried out if problems, deviations, or errors are identified -Establishing, monitoring, and documenting procedures for the handling and storage of CNSPs and/or components of CNSPs	Click or tap here to enter text.
Personnel Training and Evaluation						
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D3.	Is the handling of hazardous drugs compliant with USP <800>?	USP <795> 1. Introduction and Scope Handling of nonsterile hazardous drugs (HDs) must additionally comply with Hazardous Drugs—Handling in Healthcare Settings <800>.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D4.	Is initial and ongoing training completed and documented for personnel who compound and those who have direct oversight of compounding personnel?	USP <795> - 2. PERSONNEL TRAINING AND EVALUATION All personnel who compound or have direct oversight of compounding CNSPs must be initially trained and qualified by demonstrating knowledge and competency according to the requirements in this section (2. Personnel Training and Evaluation) before being allowed to perform their job functions independently. Personnel who compound or have direct oversight of compounding personnel must complete training initially and at least every 12 months in appropriate compounding principles and practices as described in this section. Other personnel, who do not compound and only perform functions such as in-process checks, final verification, or dispensing of CNSPs, must undergo training as required by the facility's SOPs. Training and competency of personnel must be documented as described in 14. Documentation	Click or tap here to enter text.

Compliant			#	Rule Reference	Notes/Corrective Actions
Yes	No	N/A			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D5.	<p>Does training include all required elements?</p> <p>USP <795> 2. PERSONNEL TRAINING AND EVALUATION Before beginning to compound CNSPs independently or have direct oversight of compounding personnel, personnel must complete training and be able to demonstrate knowledge of principles and competency of skills for performing nonsterile manipulations as applicable to their assigned tasks. Knowledge and competency must be demonstrated initially and at least every 12 months in at least the following core competencies:</p> <ul style="list-style-type: none"> • Hand hygiene • Garbing • Cleaning and sanitizing • Handling and transporting components and CNSPs • Measuring and mixing • Proper use of equipment and devices selected to compound CNSPs • Documentation of the compounding process (e.g., 7. Master Formulation and Compounding Records) <p>Steps in the training procedure must include the following:</p> <ul style="list-style-type: none"> • Understand the requirements in this chapter • Understand and interpret safety data sheets (SDSs) and, if applicable, certificates of analysis (COA) • Read and understand procedures related to their compounding duties 	Click or tap here to enter text.

Compliant			#	Rule Reference	Notes/Corrective Actions
Yes	No	N/A			
Personal Hygiene and Garbing					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D6.	<p>Do personnel follow appropriate hand hygiene and garbing procedures throughout compounding activities?</p> <p>USP <795> 3. PERSONAL HYGIENE AND GARBING Individuals entering the compounding area must maintain appropriate personal hygiene. Individuals must evaluate whether they have a personal risk of potentially contaminating the compounding environment and CNSP (e.g., personnel with rashes, recent tattoos, oozing sores, conjunctivitis, or active respiratory infection). Individuals must report these conditions to the designated person(s). Because of the risk of contaminating the CNSP and the environment, the designated person(s) is responsible for evaluating whether these individuals should be excluded from working in compounding areas until their conditions have resolved. Before entering the compounding area, compounding personnel must remove any items that are not easily cleanable and that might interfere with garbing. At a minimum, personnel must: -Remove personal outer garments (e.g., bandanas, coats, hats, and jackets) -Remove all hand, wrist, and other exposed jewelry, including piercings that could interfere with the effectiveness of garbing or hand hygiene (e.g., watches or rings that may tear gloves) -Remove earbuds or headphones</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D7.	<p>Is garb replaced if it is contaminated or if its integrity is compromised?</p> <p>USP <795> 3.3 Garb and Glove Requirements Garb must be replaced immediately if it becomes visibly soiled or if its integrity is compromised. All gloves must be inspected for holes, punctures, or tears and must be replaced immediately if such defects are detected.</p>	Click or tap here to enter text.

Compliant			#	Rule Reference	Notes/Corrective Actions
Yes	No	N/A			
Compounding Facilities					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D8.	<p>USP <795> 4.1 Compounding Area An area must be designated for nonsterile compounding. Other activities must not be occurring in the compounding area at the same time as compounding. The compounding area must provide for the orderly placement of equipment and materials to prevent mix-ups among components, containers, labels, in-process materials, and finished CNSPs.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D9.	<p>USP <795> 4.2 Storage Area Compounding personnel must monitor temperatures in the storage area(s) either manually at least once daily on days that the facility is open, or continuously with a temperature recording device to ensure the temperature remains within the appropriate range for the CNSPs and components. The compounding facility must adhere to SOPs to detect and reduce the risk of temperature excursions within the storage area(s). The results of the temperature readings must be documented on a temperature log or stored in the continuous temperature recording device and must be retrievable. All temperature monitoring equipment must be calibrated or verified for accuracy as recommended by the manufacturer or every 12 months if not specified by the manufacturer.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D10.	<p>USP <795> 4.2 Storage Area When it is known that a CNSP or component has been exposed to temperatures either below or above the storage temperature limits for the CNSP or component, personnel must determine whether the CNSP or component integrity or quality has been compromised, and, if so, the CNSP or component must be discarded. All CNSPs, components, equipment, and containers must be stored off the floor in a manner that prevents contamination and permits inspection and cleaning of the storage area(s).</p>	Click or tap here to enter text.

Compliant			#	Rule Reference	Notes/Corrective Actions
Yes	No	N/A			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D11.	<p>USP <795> 4.3 Water Sources A source of hot and cold water and an easily accessible sink must be available. The sink must be emptied of all items unrelated to compounding and must be cleaned if visibly soiled before being used to clean any equipment used in nonsterile compounding. The plumbing system must be free of defects that may contribute to the contamination of any CNSP.</p>	Click or tap here to enter text.

Cleaning and Sanitizing

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D12.	<p>USP <795> 5. CLEANING AND SANITIZING Cleaning and sanitizing the surfaces in the nonsterile compounding area(s) must occur on a regular basis at the minimum frequencies specified in Table 1 or, if compounding is not performed daily, cleaning and sanitizing must be completed before initiating compounding.</p> <p>Table 1. Minimum Frequency for Cleaning and Sanitizing in Nonsterile Compounding Area(s)--Surfaces</p> <p>Work surfaces -At the beginning and end of each shift on days when compounding occurs, after spills, and when surface contamination (e.g., from splashes) is known or suspected -Between compounding CNSPs with different components</p> <p>Floors -Daily on days when compounding occurs, after spills, and when surface contamination (e.g., from splashes) is known or suspected</p> <p>Walls -When visibly soiled, after spills, and when surface contamination (e.g., from splashes) is known or suspected</p> <p>Ceilings -When visibly soiled and when surface contamination (e.g., from splashes) is known or suspected</p> <p>Storage shelving -Every 3 months, after spills, and when surface contamination (e.g., from splashes) is known or suspected</p> <p>Applicable cleaning and sanitizing must be documented daily on days when compounding occurs.</p> <p>Cleaning and sanitizing agents must be selected and used with consideration of compatibilities, effectiveness, and minimal potential to leave residues.</p> <p>If cleaning and sanitizing are performed as separate steps, cleaning must be performed first.</p>	Click or tap here to enter text.
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Compliant			#	Rule Reference	Notes/Corrective Actions
Yes	No	N/A			
Equipment and Components					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D13.	<p>USP <795> 6.1 Equipment</p> <p>If a BSC, CVE, or other nondisposable device is used, it must be cleaned as described in Table 2.</p> <p>Table 2. Minimum Frequency for Cleaning and Sanitizing in Nonsterile Compounding Area(s)—Equipment</p> <p>CVE</p> <ul style="list-style-type: none"> -At the beginning and end of each shift on days when compounding occurs, after spills, and when surface contamination (e.g., from splashes) is known or suspected -Clean and sanitize the horizontal work surface of the CVE between compounding CNSPs with different components <p>BSC</p> <ul style="list-style-type: none"> -At the beginning and end of each shift on days when compounding occurs, after spills, and when surface contamination (e.g., from splashes) is known or suspected -Clean and sanitize the horizontal work surface of the BSC between compounding CNSPs with different components -Clean and sanitize under the work surface at least monthly <p>Other devices and equipment used in compounding operations</p> <ul style="list-style-type: none"> -Before first use and thereafter in accordance with the manufacturer’s recommendations -If no recommendation is available, between compounding CNSPs with different components 	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D14.	<p>USP <795> 6.2 Components</p> <p>SDSs must be readily accessible to all personnel working with components located in the compounding facility. Personnel must be instructed on how to retrieve and interpret needed information.</p>	Click or tap here to enter text.

Compliant			#	Rule Reference	Notes/Corrective Actions
Yes	No	N/A			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D15.	<p>Do APIs and components other than APIs selected for use in compounding meet minimum quality standards?</p> <p>USP <795> 6.2.1 Component selection APIs: - Must comply with the criteria in the USP–NF monograph, if one exists - Must have a COA that includes specifications (e.g., compendial requirements for quality) and test results for the component that show the API meets expected quality - In the United States, must be manufactured by an FDA-registered facility - Outside of the United States, must comply with the laws and regulations of the applicable regulatory jurisdiction All components other than APIs: - In the United States, should be manufactured by an FDA-registered facility (If a component cannot be obtained from an FDA-registered facility, the designated person(s) must select a component that is suitable for the intended use.) - Outside of the United States, must comply with the laws and regulations of the applicable regulatory jurisdiction</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D16.	<p>Is purified water or better quality used in compounding of nonsterile preparations?</p> <p>USP <795> 6.2.1 Component selection Purified Water or better quality, e.g., Sterile Water for Irrigation, must be used for compounding nonsterile drug preparations when formulations indicate the inclusion of water</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D17.	<p>Are required elements of component receipt documented in accordance with facility SOPs?</p> <p>USP <795> 6.2.2 Component receipt The following information must be documented (see 14. Documentation) according to the facility’s SOPs: receipt date, quantity received, supplier name, lot number, expiration date, and results of any in-house or third-party testing performed. For all components that lack a vendor expiration date, the date of receipt by the compounding facility must be clearly and indelibly marked on each packaging system. Packaging systems of components (i.e., API and added substances) that lack a vendor’s expiration date must not be used by the compounding facility after 3 years from the date of receipt. A shorter expiration date must be assigned according to Pharmaceutical Compounding—Sterile Preparations <797>, 9.3.2 Component receipt if the same component container is also used in sterile compounding or if the ingredient is known to be susceptible to degradation.</p>	Click or tap here to enter text.

Compliant			#		Rule Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D18.	Are unacceptable components rejected and segregated from useable stock?	USP <795> 6.2.2 Component Receipt Any component found to be of unacceptable quality must be promptly rejected, clearly labeled as rejected, and segregated from active stock to prevent use before appropriate disposal. Any other lots of that component from the same vendor must be examined to determine whether the other lots have the same defect.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D19.	Are components re-inspected prior to use?	USP <795> 6.2.3 Component Evaluation Before Use Before use, compounding personnel must visually re-inspect all components. Each packaging system must be inspected to detect any container breakage, looseness of the cap or closure, or deviation from the expected appearance or texture of the contents that might have occurred during storage. If the identity, strength, purity, and quality of components intended for preparation of CNSPs cannot be verified (e.g., containers with damaged or incomplete labeling), the components must be immediately rejected. Any component found to be of unacceptable quality must be promptly rejected, clearly labeled as rejected, and segregated from active stock to prevent use before appropriate disposal.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D20.	Are components appropriately handled to minimize contamination, mix-ups or deterioration?	USP <795> 6.2.4 Component Handling All components must be handled in accordance with the manufacturer's instructions or per laws and regulations of the applicable regulatory jurisdiction. The handling must minimize the risk of contamination, mix-ups, and deterioration (e.g., loss of identity, strength, purity, or quality). For each use, the lot must be examined for evidence of deterioration and other aspects of unacceptable quality.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D21.	Is management of nonhazardous component spills and disposal documented in accordance with facility SOPs?	USP <795> 6.2.5 Component spill and disposal The management and documentation of nonhazardous component spills and disposal must be described in the facility's SOPs.	Click or tap here to enter text.

Compliant			#		Rule Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D22.	Does spill clean up and disposal meet minimum requirements?	<p>USP <795> 6.2.5 Component Spill and Disposal The facility must have a readily accessible spill kit in the compounding area. All personnel who may be required to remediate a spill must receive training in spill management of chemicals used and stored at the compounding facility. Training must be conducted at least every 12 months and documented for all personnel who may be required to clean up a spill. Waste of any component must be disposed of in accordance with laws and regulations of the applicable regulatory jurisdiction.</p>	Click or tap here to enter text.
Master Formulation and Compounding Records						
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D23.	Do master formulation records contain all required elements?	<p>USP <795> 7.1 Creating Master Formulation Records (MFR) Box 2. Master Formulation Record An MFR must include at least the following information: -Name, strength or activity, and dosage form of the CNSP -Identities and amounts of all components; if applicable, relevant characteristics of components (e.g., particle size, salt form, purity grade, solubility) -Container closure system(s) -Complete instructions for preparing the CNSP including equipment, supplies, and description of compounding steps -Physical description of the final CNSP -Beyond-use date (BUD) and storage requirements -Reference source to support the assigned BUD -If applicable, calculations to determine and verify quantities and/or concentrations of components and strength or activity of the API(s) -Labeling requirements (e.g., shake well) - Quality control (QC) procedures (e.g., pH testing, visual inspection) and expected results -Other information needed to describe the compounding process and ensure repeatability (e.g., adjusting pH, temperature)</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D24.	Are compounding records created for all CNSPs? ***Note: This does not include reconstitution.	<p>USP <795> 7.2 Creating Compounding Records (CR) A CR must be created for all CNSPs. Each CR must be reviewed for completeness before the CNSP is released. The name or other unique identifier of the person completing the review and the date of the review must be documented on the CR. The CR must permit traceability of all components in the case of a recall or known quality issue.</p>	Click or tap here to enter text.

Compliant			#		Rule Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D25.	Do compounding records contain all required elements?	USP <795> 7.2 Creating Compounding Records Box 3. Compounding Record A CR must include at least the following information: -Name, strength or activity, and dosage form of the CNSP -Date—or date and time—of preparation of the CNSP -Assigned internal identification number (e.g., prescription, order, or lot number) -A method to identify the individuals involved in the compounding process and individuals verifying the final CNSP -Name, vendor or manufacturer, lot number, and expiration date of each component -Weight or measurement of each component -Total quantity of the CNSP compounded -Assigned beyond-use date (BUD) and storage requirements -If applicable, calculations to determine and verify quantities and/or concentrations of components and strength or activity of the API(s) -Physical description of the final CNSP -Results of quality control procedures (e.g., pH testing and visual inspection) -MFR reference for the CNSP	Click or tap here to enter text.

Compliant			#	Rule Reference	Notes/Corrective Actions
Yes	No	N/A			
Release Inspections and Testing					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D26.	<p>USP <795> 8.1 Visual Inspection At the completion of compounding, before releasing and dispensing, the CNSP must be visually inspected to determine whether the physical appearance of the CNSP is as expected (e.g., color, texture, physical uniformity). Some CNSPs, as noted in their MFR, also must be visually checked for certain characteristics (e.g., emulsions must be checked for phase separation). The CNSP must be visually inspected to confirm that the CNSP and its labeling match the CR and the prescription or medication order. The inspection also must include a visual inspection of container closure integrity (e.g., checking for leakage, cracks in the container, or improper seals). When a CNSP will not be released or dispensed on the day of preparation, a visual inspection must be conducted immediately before it is released or dispensed to make sure that the CNSP does not exhibit any defects (e.g., leakage) that could develop during storage. Any CNSP found to be of unacceptable quality (e.g., observed defects) must be promptly rejected, clearly labeled as rejected, and segregated from active stock to prevent use before appropriate disposal.</p>	Click or tap here to enter text.
Labeling					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D27.	<p>USP <795> 9. Labeling The label on each container of the prepared CNSP must, at a minimum, display prominently and legibly the following information: -Assigned internal identification number (e.g., barcode, prescription, order, or lot number) -Active ingredient(s), and their amount(s), activity(ies), or concentration(s) -Storage conditions if other than controlled room temperature -BUD -Dosage form -Total amount or volume if it is not obvious from the container</p>	Click or tap here to enter text.

Compliant			#		Rule Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D28.	Are CNSP labels verified for accuracy following facility SOPS?	USP <795> 9. Labeling Labeling procedures must be followed as described in the facility's SOPs to prevent labeling errors and CNSP mix-ups. The label of the CNSP must be verified to ensure that it conforms with the following: -Prescription or medication order; -MFR (see 7.1 Creating Master Formulation Records); and -CR (see 7.2 Creating Compounding Records).	Click or tap here to enter text.
Beyond Use Dating						
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D29.	Are required parameters considered when establishing a BUD?	USP <795> 10.2 Parameters to Consider in Establishing a BUD When establishing a BUD for a CNSP, compounders must consider parameters that may affect quality, including but not limited to the following: -Chemical and physical stability properties of the API and any added substances in the preparation (e.g., if the API and added substances in the preparation are known to rapidly degrade over time and/or under certain storage conditions, reduce the strength of the preparation, or produce harmful impurities) -Compatibility of the container closure system with the finished preparation (e.g., leachables, interactions, adsorption, and storage conditions) -Degradation of the container closure system, which can lead to a reduction in integrity of the CNSP -Potential for microbial proliferation in the CNSP -Significant deviations from essential compounding steps and procedures; changes to essential compounding steps may have an impact on the stability of the formulation	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D30.	Are BUDs assigned not to exceed the shortest expiration date of any commercially available component used in the CNSP?	USP <795> 10.4 CNSPs Requiring Shorter BUDs The BUDs in Table 4 are the BUD limits for CNSPs in the absence of specific stability information. This does not absolve the designated person(s) from performing due diligence to determine if there is existing stability data that would require a shorter BUD. Additionally, -The BUD of the CNSP must not exceed the shortest remaining expiration date of any of the commercially available starting components.	Click or tap here to enter text.

Compliant			#	Rule Reference	Notes/Corrective Actions
Yes	No	N/A			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D31.	<p>When compounded products are used in a CNSP, is the BUD assigned in a manner that does not negatively impact the final CNSP?</p> <p>USP <795> 10.4 CNSPs Requiring Shorter BUDs-For CNSPs prepared from one or more compounded components, the BUD should generally not exceed the shortest BUD of any of the individual compounded components. However, there may be acceptable instances when the BUD of the final CNSP exceeds the BUD assigned to compounded components (e.g., pH-altering solutions). If the assigned BUD of the final CNSP exceeds the BUD of the compounded components, the physical, chemical, and microbiological quality of the final CNSP must not be negatively impacted.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D32.	<p>Are assigned BUDs limited based on the type of preparation in the absence of USP-NF monograph?</p> <p>USP <795> 10.4 CNSPs Requiring Shorter BUDs Table 4. BUD Limit by Type of Preparation in the Absence of a USP-NF Compounded Preparation Monograph or CNSP-Specific Stability Information Aqueous Dosage Forms ($aw \geq 0.60$) -Nonpreserved aqueous dosage forms--14 day BUD--storage: refrigerator -Preserved aqueous dosage forms--35 day BUD--storage: controlled room temperature or refrigerator Nonaqueous Dosage Forms ($aw < 0.60$) -Oral liquids (nonaqueous)--90 day BUD--storage: controlled room temperature or refrigerator -Other nonaqueous dosage forms--180 day BUD--storage: controlled room temperature or refrigerator</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D33.	<p>Do BUDs for CNSPs follow a USP-NF monograph or appropriate stability studies if available?</p> <p>USP <795> 10.5 Extending BUDs for CNSPs CNSPs with a USP-NF monograph: When compounding from a USP-NF compounded preparation monograph for the CNSP, the BUD must not exceed the BUD specified in the monograph. CNSPs with stability information: If there is a stability study using a stability-indicating analytical method for the API(s), CNSP formulation, and material of composition of the container closure that will be used, then the BUD indicated by the study may be used in lieu of the BUDs specified in Table 4 for aqueous and nonaqueous dosage forms, up to a maximum of 180 days.</p>	Click or tap here to enter text.

Compliant			#	Rule Reference	Notes/Corrective Actions
Yes	No	N/A			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D34.	<p>USP <795> 10.5 Extending BUDs for CNSPs</p> <p>If the BUD of the CNSP is extended beyond the BUDs in Table 4, an aqueous CNSP must be tested for antimicrobial effectiveness (see Antimicrobial Effectiveness Testing (51)). The designated person(s) may rely on antimicrobial effectiveness testing that is conducted (or contracted for) once for each formulation in the particular container closure system—including materials of composition of the container closure system—in which it will be packaged. Alternatively, the designated person(s) may rely on antimicrobial effectiveness testing results provided by an FDA-registered facility or published in peer-reviewed literature as long as the CNSP formulation (including any preservative) and container closure materials of composition are the same as those tested (unless a bracketing study is performed). When a bracketing study is performed, antimicrobial effectiveness testing may be performed on a low concentration and on a high concentration of the active ingredient in the formulation to establish preservative effectiveness across various strengths of the same formulation (e.g., bracketing). The concentration of all other ingredients (including preservatives) must fall within the bracketed range.</p>	Click or tap here to enter text.
Standard Operating Procedures					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D35.	<p>USP <795> 11. SOPS</p> <p>Facilities preparing CNSPs must develop SOPs on all aspects of the compounding operation. All personnel who conduct or oversee compounding activities must be trained in the facility's SOPs and be responsible for ensuring that they are followed. One or more person(s) must be designated to ensure that the facility's SOPs are fully implemented. The designated person(s) must ensure that follow-up occurs if problems, deviations, or errors are identified.</p>	Click or tap here to enter text.

Compliant			#	Rule Reference	Notes/Corrective Actions
Yes	No	N/A			
Quality Assurance and Quality Control					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D36.	<p>USP <795> 12. QUALITY ASSURANCE AND QUALITY CONTROL Designated person(s) must ensure that the facility has formal, written QA and QC programs that establish a system of</p> <ol style="list-style-type: none"> 1. Adherence to procedures, 2. Prevention and detection of errors and other quality problems, 3. Evaluation of complaints and adverse events, and 4. Appropriate investigations and corrective actions. <p>The overall QA and QC program must be reviewed at least once every 12 months by the designated person(s). The results of the review must be documented, and appropriate action must be taken if needed.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D37.	<p>USP <795> 12.1 Notification About and Recall of Dispensed CNSPs The facility must have procedures in place to</p> <ul style="list-style-type: none"> -Determine when recalls must be initiated, which should include procedures to immediately notify the prescriber of a failure of specifications with the potential to cause patient harm (e.g., strength, purity, or other quality attributes) -Recall any unused dispensed CNSPs and quarantine any stock remaining in the pharmacy -Investigate if other lots are affected and recall if necessary 	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D38.	<p>USP <795> 12.2 Complaint Handling A designated person(s) must review all complaints to determine whether the complaint indicates a potential quality problem with the CNSP.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D39.	<p>USP <795> 12.2 Complaint Handling If it does, a thorough investigation into the cause of the problem must be initiated and completed. The investigation must consider whether the quality problem extends to other CNSPs. Corrective action, if necessary, must be implemented for all potentially affected CNSPs.</p>	Click or tap here to enter text.

Compliant			#	Rule Reference	Notes/Corrective Actions
Yes	No	N/A			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D40.	<p>Are complaint records readily retrievable and do they include all required elements?</p> <p>USP <795> 12.2 Complaint Handling A readily retrievable written or electronic record of each complaint must be kept by the facility, regardless of the source of the complaint (e.g., email, telephone, or mail). The record must contain the name of the complainant or other unique identifier, the date the complaint was received, the nature of the complaint, and the response to the complaint. In addition, to the extent that the information is known, the following should be recorded: the name and strength of the CNSP and the assigned internal identification number (e.g., prescription, order, or lot number). The record must also include the findings of any investigation and any follow-up. Records of complaints must be easily retrievable for review and evaluation for possible trends and must be retained in accordance with the record-keeping requirements in 14. Documentation. A CNSP that is returned in connection with a complaint must be quarantined until it is destroyed after completion of the investigation and in accordance with laws and regulations of the applicable regulatory jurisdiction.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D41.	<p>Are adverse events potentially associated with CNSP quality reported in accordance with SOPs?</p> <p>USP <795> 12.3 Adverse Event Reporting Adverse events potentially associated with the quality of CNSPs must be reported in accordance with the facility's SOPs and all laws and regulations of the applicable regulatory jurisdiction.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D42.	<p>If an adverse event is associated with a quality problem are patients and prescribers informed?</p> <p>USP <795> 12.3 Adverse Event Reporting If the investigation into an adverse event reveals a quality problem with a CNSP that is likely to affect other patients, those patients and prescribers potentially affected must be informed.</p>	Click or tap here to enter text.
Packaging and Transporting					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D43.	<p>Does packaging protect the CNSP from damage while protecting personnel from exposure?</p> <p>USP <795> 13.1 Packaging of CNSPs Packaging materials must protect CNSPs from damage, leakage, contamination, and degradation, while simultaneously protecting personnel from exposure.</p>	Click or tap here to enter text.

Compliant			#	Rule Reference	Notes/Corrective Actions
Yes	No	N/A			
Documentation					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D44.	<p>USP <795> 14. DOCUMENTATION All facilities where CNSPs are prepared must have and maintain written or electronic documentation to demonstrate compliance with the requirements in this chapter. This documentation must include, but is not limited to, the following:</p> <ul style="list-style-type: none"> -Personnel training, competency assessments, and qualification records including corrective actions for any failures -Equipment records (e.g., calibration, verification, and maintenance reports) -COAs and all documentation required for components not conventionally manufactured -Receipt of components -SOPs, MFRs, and CRs -Release inspection and testing records -Information related to complaints and adverse events including corrective actions taken -Results of investigations and corrective actions -Records of cleaning and sanitizing the designated compounding area -Temperature logs -Accommodations to personnel compounding CNSPs -Any required routine review (e.g., yearly review of QA and QC programs, yearly review of chemical hazard and disposal information) 	Click or tap here to enter text.
				Is documentation maintained for all required records?	

Standard Operating Procedure Locations

Please provide the physical location of the document in the pharmacy, or file pathway if policies are maintained in electronic format. Please be as specific as possible, there can be many file cabinets and binders.

D45.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <795> 2. PERSONNEL TRAINING AND EVALUATION Facility SOPs must describe procedures for monitoring and observing compounding activities and personnel.	Click or tap here to enter text.
D46.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <795> 3.3 Garb and Glove Requirements Garbing requirements and frequency of changing garb must be determined by the facility and documented in the facility's SOPs.	Click or tap here to enter text.
D47.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <795> 3.3 Garb and Glove Requirements The facility's SOPs must describe cleaning and sanitization procedures for reusing goggles, respirators, and other reusable equipment.	Click or tap here to enter text.
D48.	Title or SOP number: Click or tap here to enter text. Location or file path Click or tap here to enter text. way:	USP <795> 4.1 Compounding Area An area must be designated for nonsterile compounding. The method of designation must be described in the facility's SOPs.	Click or tap here to enter text.
D49.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <795> 6.2 Components The compounding facility must have written SOPs for the selection and inventory control of all components from receipt to use in a CNSP.	Click or tap here to enter text.
D50.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <795> 12. QUALITY ASSURANCE AND QUALITY CONTROL A facility's QA and QC programs must be formally established and documented in the facility's SOPs that ensure that all aspects of the preparation of CNSPs are conducted in accordance with the requirements in this chapter (<795>) and the laws and regulations of the applicable regulatory jurisdiction.	Click or tap here to enter text.
D51.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <795> 12. QUALITY ASSURANCE AND QUALITY CONTROL The facility's SOPs must describe the roles, duties, and training of the personnel responsible for each aspect of the QA program. Designated person(s) responsible for the QA program must have the training, experience, responsibility, and authority to perform these duties.	Click or tap here to enter text.

Standard Operating Procedure Locations

D52.	<p>Title or SOP number: Click or tap here to enter text.</p> <p>Location or file pathway: Click or tap here to enter text.</p>	<p>USP <795> 12.1 Notification About and Recall of Dispensed CNSPs</p> <p>An SOP for recall of dispensed CNSPs must contain</p> <ul style="list-style-type: none"> -Procedures to determine the severity of the problem and the urgency for implementation and completion of the recall -Procedures to determine the distribution of any affected CNSP, including the data and quantity of distribution -Procedures to identify patients who have received the CNSP -Procedures for disposal and documentation of the recalled CNSP -Procedures to investigate and document the reason for recall 	Click or tap here to enter text.
D53.	<p>Title or SOP number: Click or tap here to enter text.</p> <p>Location or file pathway: Click or tap here to enter text.</p>	<p>USP <795> 12.2 Complaint Handling</p> <p>Compounding facilities must develop and implement SOPs for handling complaints.</p>	Click or tap here to enter text.
D54.	<p>Title or SOP number: Click or tap here to enter text.</p> <p>Location or file pathway: Click or tap here to enter text.</p>	<p>USP <795> 13.1 Packaging of CNSPs</p> <p>The facility's SOPs must describe packaging of CNSPs.</p>	Click or tap here to enter text.
D55.	<p>Title or SOP number: Click or tap here to enter text.</p> <p>Location or file pathway: Click or tap here to enter text.</p>	<p>USP <795> 13.2 Transporting of CNSPs</p> <p>If transporting CNSPs, the facility must have written SOPs to describe the mode of transportation, any special handling instructions, and whether temperature monitoring devices are needed.</p>	Click or tap here to enter text.



Read this page carefully

**WA Pharmacy Quality Assurance Commission
Pharmacy Self-Inspection Worksheet
2023 USP 797 – Sterile Compounding Addendum**

Attention: Responsible Pharmacy Manager or Equivalent Manager

Washington law holds the responsible manager (or equivalent manager) and all pharmacists on duty responsible for ensuring pharmacy compliance with all state and federal laws governing the practice of pharmacy. Failure to complete this addendum within the month of March and within 30 days of becoming responsible manager (as required by WAC 246-945-005) may result in disciplinary action. The following addendum is required to be filled out and kept on file with the General Pharmacy or Hospital Pharmacy Self-Inspection Worksheet. **Do not send to the commission office.**

The primary objective of this report, and your self-inspection, is to provide an opportunity to identify and correct areas of non-compliance with state and federal law. This worksheet does not replace U.S. Pharmacopeia (USP) <797> Pharmaceutical Compounding – Sterile Preparations. (**Note:** Neither the self-inspection nor a commission inspection evaluates your complete compliance with all laws and rules of the practice of pharmacy.)

By answering the questions and referencing the appropriate laws/rules/CFR provided, you can determine whether you are compliant with many of the rules and regulations. If you have corrected any deficiencies, please write corrected and the date of correction by the appropriate question.

Compounding does not include mixing, reconstituting, or other such acts that are performed in accordance with directions contained in approved labeling or supplemental materials provided by the product's manufacturer. Preparing a conventionally manufactured sterile product in accordance with the directions in the manufacturer's approved labeling is out of scope of this chapter only if: 1. The product is prepared as a single dose for an individual patient; and 2. The approved labeling includes information for the diluent, the resultant strength, the container closure system, and storage time.

Date responsible manager/change of responsible manager inspection was performed: Click or tap to enter a date.

Signature of responsible pharmacy manager: [Click or tap here to enter text.](#)

General Rule Reference - Applies to all questions through worksheet.

RCW 18.64.270(2) "Any medicinal products that are compounded for patient administration or distribution to a licensed practitioner for patient use or administration shall, at a minimum, meet the standards of the official United States pharmacopeia as it applies to nonsterile products and sterile administered products."

To request this document in another format, call 1-800-525-0127. Deaf or hard of hearing customers, please call 711 (Washington Relay) or email civil.rights@doh.wa.gov. View translated versions of this statement [here](#).

Please Note: When determining compliance with a question that has multiple requirements, if the facility is NOT compliant with any single requirement in the question check the "No" compliance box. Include an explanation of which part is noncompliant in the "Notes/Corrective Actions" column. Checking the "Yes" compliance box indicates compliance with all requirements in a question.

Does the pharmacy engage in compounding with hazardous drugs?
If yes, you must also complete the 2023 USP 800 – Hazardous Drugs Addendum

Compliant			#	USP Reference	Notes/Corrective Actions
Yes	No	N/A			
Introduction and Scope					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D1.	<p>Are manipulations of patient’s blood-derived or other biological material separated from other compounded activities and equipment used to prepare CSP and controlled to avoid cross-contamination?</p> <p>USP <797> 1.1.2 Specific practices Blood-derived and other biological materials: When compounding activities require the manipulation of a patient’s blood-derived or other biological material (e.g., autologous serum), the manipulations must be clearly separated from other compounding activities and equipment used in CSP preparation activities, and they must be controlled by specific standard operating procedures (SOPs) to avoid any cross-contamination. Handling of blood components and other biological materials must additionally comply with laws and regulations of the applicable regulatory jurisdiction.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D2.	<p>Does the compounding facility have a designated person(s) responsible for the performance and operation of the facility and personnel?</p> <p>1.1.3 Personnel and settings affected: The compounding facility must designate one or more individuals (i.e., the designated person(s)) to be responsible and accountable for the performance and operation of the facility and personnel in the preparation of CSPs and for performing other functions as described in this chapter.</p> <p><i>***Enter the name of designated person(s) in the Notes/Corrective Actions field</i></p>	Click or tap here to enter text.

2023 USP <797> Sterile Compounding Self-Inspection Addendum

Compliant			#		USP Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D3.	Does immediate-use compounding meet all requirements?	<p>USP <797> 1.3 Immediate-Use CSPs When all of the following conditions are met, compounding of CSPs for direct and immediate administration is not subject to the requirements for Category 1, Category 2, or Category 3 CSPs:</p> <ol style="list-style-type: none"> 1. Aseptic techniques, processes, and procedures are followed, and written SOPs are in place to minimize the potential for contact with nonsterile surfaces, introduction of particulate matter or biological fluids, and mix-ups with other conventionally manufactured products or CSPs. 2. Personnel are trained and demonstrate competency in aseptic processes as they relate to assigned tasks and the facility's SOPs. 3. The preparation is performed in accordance with evidence-based information for physical and chemical compatibility of the drugs (e.g., approved labeling, stability and compatibility studies). 4. The preparation involves not more than 3 different sterile products. 5. Any unused starting component from a single-dose container must be discarded after preparation is complete. Single-dose containers must not be used for more than one patient. 6. Administration begins within 4 h following the start of preparation. If administration has not begun within 4 h following the start of preparation, it must be promptly, appropriately, and safely discarded. 7. Unless directly administered by the person who prepared it or administration is witnessed by the preparer, the CSP must be labeled with the names and amounts of all active ingredients, the name or initials of the person who prepared the preparation, and the 4-h time period within which administration must begin. 	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D4.	Is docking of proprietary bag and vial systems for future use performed in an ISO Class 5 environment and the BUD assigned per manufacturer's labeling?	<p>USP <797> 1.4 Preparation Per Approved Labeling Proprietary bag and vial systems: Docking and activation of proprietary bag and vial systems in accordance with the manufacturer's labeling for immediate administration to an individual patient is not considered compounding and may be performed outside of an International Organization for Standardization (ISO) Class 5 environment. Docking of the proprietary bag and vial systems for future activation and administration is considered compounding and must be performed in an ISO Class 5 environment in accordance with this chapter, with the exception of 14. Establishing Beyond-Use Dates. Beyond-use dates (BUDs) for proprietary bag and vial systems must not be longer than those specified in the manufacturer's labeling.</p>	Click or tap here to enter text.

Compliant			#		USP Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D5:	When CSPs are prepared using any nonsterile components, is the component sterilized, is sterility maintained if subsequently manipulated, and are bacterial endotoxins mitigation strategies employed?	USP <797> 1.5 CSP Categories If one or more of the starting components being used to compound is not sterile, the sterility of the compounded preparation must be achieved through a sterilization process (e.g., terminal sterilization in the final sealed container) or sterilizing filtration, and then sterility must be maintained if the CSP is subsequently manipulated. When compounding with nonsterile starting components, supplies, or equipment, the quality of the components, the effectiveness of the sterilization step, and bacterial endotoxin mitigation strategies are critical to achieving a sterile preparation that is free from excessive bacterial endotoxins.	Click or tap here to enter text.

Personnel Training and Evaluation

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D6:	Has the designated person(s) created and implemented a written training program for initial and ongoing training completed and documented for personnel who compound and those who have direct oversight of compounding personnel?	2. PERSONNEL TRAINING AND EVALUATION All personnel who compound or have direct oversight of compounding personnel must be initially trained and qualified by demonstrating knowledge and competency in compounding CSPs according to the requirements in this section before being allowed to perform their job functions independently. Designated person(s) are responsible for creating and implementing a training program for personnel and for ensuring that compounders, personnel who have direct oversight of compounders, and personnel who perform restocking or cleaning and disinfection duties are initially trained and qualified by demonstrating knowledge and competency in maintaining the quality of the sterile compounding environment before being allowed to perform their job functions independently. Personnel who compound or have direct oversight of compounding personnel must complete training initially and at least every 12 months in appropriate sterile compounding principles and practices as described below (see 2.1 <i>Demonstrating Knowledge and Competency of Core Skills</i>). Personnel who only perform restocking or cleaning and disinfecting duties outside of the primary engineering control (PEC) must complete ongoing training as required by the facility's SOPs. Each compounding facility must develop a written training program that describes the required training, the frequency of training, and the process for evaluating the performance of individuals who compound, have direct oversight of compounding personnel, perform in-process checks, final verification, and dispensing of CSPs.	Click or tap here to enter text.
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Compliant			#	USP Reference	Notes/Corrective Actions
Yes	No	N/A			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D7.	<p>2.1 Demonstrating Knowledge and Competency of Core Skills Before beginning to compound CSPs independently or have direct oversight of compounding personnel, personnel must complete training and be able to demonstrate knowledge of principles and competency of skills for performing sterile manipulations and achieving and maintaining appropriate environmental conditions as applicable to their assigned job functions. This must be completed initially and at least every 12 months in at least the following:</p> <ul style="list-style-type: none"> • Hand hygiene • Garbing • Cleaning and disinfection • Calculations, measuring, and mixing • Aseptic technique • Achieving and/or maintaining sterility (and apyrogenicity if compounding with nonsterile components) • Use of equipment • Documentation of the compounding process (e.g., master formulation and compounding records) • Principles of high-efficiency particulate air (HEPA)-filtered unidirectional airflow within the ISO Class 5 area • Proper use of PECs • Principles of movement of materials and personnel within the compounding area <p>If the facility has only one person in the compounding operation, that person must document that they have obtained training and demonstrated competency, and they must comply with the other requirements of this chapter.</p>	Click or tap here to enter text.

2023 USP <797> Sterile Compounding Self-Inspection Addendum

Compliant			#	USP Reference	Notes/Corrective Actions
Yes	No	N/A			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D8.	<p>2.2 Demonstrating Competency in Garbing and Hand Hygiene Before beginning to compound Category 1, Category 2, or Category 3 CSPs or have direct oversight of compounding personnel, personnel must successfully complete an initial garbing competency evaluation no fewer than 3 separate times. The 3 successful completions must be in succession—failure of any of the 3 initial garbing competency evaluations requires repeat testing until personnel successfully complete 3 evaluations in a row. The garbing competency evaluation consists of a visual observation and gloved fingertip and thumb sampling (GFT) of both hands (see <i>Box 1</i>). Each of the 3 initial competency evaluations must occur after performing a separate and complete hand hygiene and full garbing procedure. All garbing competencies must be completed with gloved fingertip and thumb sampling after garbing (see <i>Box 1</i>) and a documented visual audit while performing hand hygiene and garbing procedures (see 3. <i>Personal Hygiene and Garbing</i>). Gloved fingertip and thumb sampling after garbing, but before applying sterile 70% IPA to gloves, must be performed on donned sterile gloves on both hands in a classified area or segregated compounding area (SCA).</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D9.	<p>2.2 Demonstrating Competency in Garbing and Hand Hygiene Failure is indicated by visual observation of improper hand hygiene and garbing procedures and/or gloved fingertip and thumb sampling results that exceed the action levels in <i>Table 1</i>. Results of the evaluation and corrective actions, in the event of failure, must be documented and the documentation maintained to provide a record and long-term assessment of personnel competency.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D10.	<p>2.2 Demonstrating Competency in Garbing and Hand Hygiene Documentation must at a minimum include the name of the person evaluated; evaluation date and time; media and components used including manufacturer, expiration date, and lot number; starting temperature for each interval of incubation; dates of incubation; results and identification of the observer and personnel reading and documenting the results. Microbial identification of the colony-forming units (cfu) is not required for gloved fingertip and thumb sampling.</p>	Click or tap here to enter text.

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Compliant			#	USP Reference	Notes/Corrective Actions
Yes	No	N/A			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D11.	<p>2.2 Demonstrating Competency in Garbing and Hand Hygiene After the initial garbing competency evaluations, compounding personnel must successfully complete the garbing competency (see <i>Table 1</i>) at least one time every 6 months for personnel compounding Category 1 and Category 2 CSPs, and at least one time every 3 months for personnel compounding Category 3 CSPs.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D12.	<p>2.2 Demonstrating Competency in Garbing and Hand Hygiene Personnel who have direct oversight of compounding personnel, but do not compound, must complete a garbing competency evaluation every 12 months. The evaluation should correspond to the type of garbing activities of the personnel they oversee. Personnel who have direct oversight of compounding personnel must not compound unless they successfully complete the garbing competency evaluation at the same intervals required for compounding personnel.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D13.	<p>2.3 Competency Testing in Aseptic Manipulation Before beginning to compound Category 1, Category 2, or Category 3 CSPs independently or have direct oversight of compounding personnel, personnel must successfully complete an aseptic manipulation competency evaluation. The aseptic manipulation competency evaluation consists of a visual observation, media-fill testing, followed by a gloved fingertip and thumb sampling on both hands, and surface sampling of the direct compounding area to assess aseptic technique and related practices (see <i>Box 2</i>). For personnel compounding Category 1 and Category 2 CSPs, the aseptic manipulation competency must occur initially and at least every 6 months thereafter. For personnel compounding Category 3 CSPs, the aseptic manipulation competency must occur initially and at least every 3 months thereafter. Personnel who have direct oversight of compounding personnel must complete an aseptic manipulation competency evaluation annually. Personnel who have direct oversight of compounding personnel must not compound unless they successfully complete the aseptic manipulation competency evaluation that simulates the most difficult and challenging aseptic compounding procedures encountered by the person at the same intervals required for compounding personnel.</p>	Click or tap here to enter text.

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Compliant			#	USP Reference	Notes/Corrective Actions
Yes	No	N/A			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D14.	<p>Do media-fill test procedures simulate the most difficult and challenging aseptic compounding procedures?</p> <p>2.3 Competency Testing in Aseptic Manipulation When performing a media-fill test, simulate the most difficult and challenging aseptic compounding procedures encountered by the person replacing all the components used in the CSPs with soybean–casein digest media. The simulation must capture elements that could potentially affect the sterility of the CSP including but not limited to:</p> <ul style="list-style-type: none"> • Factors associated with the length of the process that can pose contamination risk (e.g., operator fatigue, quality of equipment) • Number of aseptic additions or transfers • Number, type, and complexity of manipulations • Number of personnel in the buffer room or SCA 	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D15.	<p>Does sterile microbial growth media support growth as demonstrated by a COA from the supplier or by growth promotion testing for growth media prepared in house?</p> <p>2.3 Competency Testing in Aseptic Manipulation If using commercial sterile microbial growth media, a certificate of analysis (COA) must be obtained from the supplier stating that the lot of the growth media will support the growth of microorganisms. Store microbial growth media in accordance with manufacturer instructions and initiate the media-fill test by the expiration date of the media. If preparing sterile microbial growth media in-house for sterile-to-sterile media-fill testing, the growth promotion capability of the media must be demonstrated for each batch and documented as described in <i>Sterility Tests (71), Culture Media and Incubation Temperatures, Growth Promotion Test of Aerobes, Anaerobes, and Fungi</i>.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D16.	<p>Is gloved fingertip and thumb sampling performed on both hands immediately following the media-fill test inside an ISO Class 5 PEC?</p> <p>2.3 Competency Testing in Aseptic Manipulation Immediately following the media-fill test, gloved fingertip and thumb sampling must be performed on both hands and inside of an ISO Class 5 PEC. If conducting gloved fingertip and thumb sampling in a compounding aseptic isolator (CAI), compounding aseptic containment isolator (CACI), or a pharmaceutical isolator, samples must be taken from the sterile gloves placed over the gloves attached to the restricted-access barrier system (RABS) or pharmaceutical isolator sleeves.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>		D17.	<p>Is surface sampling of the direct compounding area performed following media-fill testing?</p> <p>2.3 Competency Testing in Aseptic Manipulation Surface sampling of the direct compounding area must occur in accordance with the requirements in <i>6.3 Monitoring Surfaces for Viable Particles</i>. A failure in the media fill, gloved fingertip and thumb sampling, or surface sample constitutes an overall failure of the aseptic manipulation competency.</p>	Click or tap here to enter text.

Compliant			#		USP Reference	Notes/Corrective Actions						
Yes	No	N/A										
<input type="checkbox"/>	<input type="checkbox"/>		D18.	Are the results of evaluation and corrective actions documented and maintained to provide long-term assessment of personnel competency?	2.3 Competency Testing in Aseptic Manipulation Results of the evaluation and corrective actions must be documented, and the documentation maintained to provide a record and long-term assessment of personnel competency.	Click or tap here to enter text.						
<input type="checkbox"/>	<input type="checkbox"/>		D19.	Does documentation of media-fill testing include all required elements?	2.3 Competency Testing in Aseptic Manipulation Documentation must at a minimum include 1) the name of the person evaluated, 2) evaluation date and time, 3) media and components used including their manufacturer or supplier, 4) expiration dates and lot numbers, 5) starting temperature for each interval of incubation, 6) dates of incubation, 7) the results, and 8) the names or other identification of the observer and the person who reads and documents the results.	Click or tap here to enter text.						
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D20.	Are action levels for gloved fingertip and thumb sampling set at the appropriate thresholds?	2.3 Competency Testing in Aseptic Manipulation Table 1. Action Levels for Gloved Fingertip and Thumb Sampling <table border="1" style="margin-left: 20px;"> <tr> <td>Gloved Fingertip and Thumb Sampling</td> <td>Action Levels (cfu, total from both hands)</td> </tr> <tr> <td>After garbing</td> <td>>0</td> </tr> <tr> <td>After media-fill testing</td> <td>>3</td> </tr> </table>	Gloved Fingertip and Thumb Sampling	Action Levels (cfu, total from both hands)	After garbing	>0	After media-fill testing	>3	Click or tap here to enter text.
Gloved Fingertip and Thumb Sampling	Action Levels (cfu, total from both hands)											
After garbing	>0											
After media-fill testing	>3											
Personal Hygiene and Garbing												
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D21.	Do personnel that have a higher risk of contaminating a CSP or the environment report their conditions to the designated person(s)?	USP <797> PERSONAL HYGIENE AND GARBING Individuals that may have a higher risk of contaminating the CSP and the environment (e.g., personnel with rashes, recent tattoos, oozing sores, conjunctivitis, or active respiratory infections) must report these conditions to the designated person(s). The designated person(s) may permit accommodations to personnel preparation as long as the quality of the CSP and environment will not be affected. Accommodations must be documented.	Click or tap here to enter text.						
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D22.	Are food and drinks prohibited from anterooms, buffer rooms, and SCAs?	USP <797> 3.1 Personnel Preparation Food (including mints, gum, etc.) and drinks must not enter anterooms, buffer rooms, or segregated compounding areas.	Click or tap here to enter text.						

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Compliant			#		USP Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D23.	Before entering a compounding area do personnel remove unnecessary items and items not easily cleanable?	<p>USP <797> 3.1 Personnel Preparation Before entering a compounding area, individuals must remove any items that are not easily cleanable or are not necessary for compounding. At a minimum, individuals must:</p> <ul style="list-style-type: none"> • Remove personal outer garments (e.g., bandanas, coats, hats, jackets, sweaters, vests) • Remove all cosmetics because they shed flakes and particles • Remove all hand, wrist, and other exposed jewelry, including piercings that could interfere with the effectiveness of garbing (e.g., the fit of gloves, cuffs of sleeves, and eye protection) or otherwise increase the risk of contamination of the CSP. Cover any jewelry that cannot be removed. • Not wear earbuds or headphones • Not bring electronic devices that are not necessary for compounding or other required tasks into the compounding area • Keep nails clean and neatly trimmed to minimize particle shedding and avoid glove punctures. Nail products (e.g., polish, artificial nails, and extenders) must not be worn • Wipe eyeglasses, if worn 	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D24.	Are hand hygiene requirements met before initiating compounding activities?	<p>USP <797> 3.2 Hand Hygiene Any person entering a compounding area where Category 1, Category 2, or Category 3 CSPs are prepared must wash hands and forearms up to the elbows with soap and water before initiating compounding activities. Brushes must not be used for hand hygiene. Hand dryers must not be used. To minimize the risk of extrinsic contamination, disposable soap containers must not be refilled or topped off. Hands must be sanitized with alcohol-based hand rub before donning sterile gloves (see <i>Box 4</i>).</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D25.	Are sterile gloves donned in a classified room or SCA?	<p>USP <797> 3.2 Hand Hygiene Sterile gloves must be donned in a classified room or SCA.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D26.	Are all persons entering a compounding area properly garbed following facility SOPs?	<p>USP <797> 3.3 Garbing Requirements Any person entering a compounding area where Category 1, Category 2, or Category 3 CSPs are prepared must be properly garbed. Garb must be donned and doffed in an order that reduces the risk of contamination. The required garb, manner of storage, and order of garbing must be determined by the facility and documented in the facility's SOPs. If hand hygiene is completed outside of a classified area, alcohol-based hand rub must be used prior to donning garb.</p>	Click or tap here to enter text.

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Compliant			#		USP Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D27.	Is skin exposure prohibited inside the ISO Class 5 PEC?	USP <797> 3.3 Garbing Requirements Skin must not be exposed inside the ISO Class 5 PEC (e.g., gloves must not be donned or doffed inside the ISO Class 5 PEC exposing bare hands).	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D28.	Are garbing requirements for preparing Category 1 and Category 2 CSPs followed?	USP <797> 3.3 Garbing Requirements The minimum garbing requirements for preparing Category 1 and Category 2 CSPs include the following: <ul style="list-style-type: none"> • Low-lint garment with sleeves that fit snugly around the wrists and an enclosed neck (e.g., gown or coverall) • Low-lint covers for shoes • Low-lint cover for head that covers the hair and ears, and if applicable, cover for facial hair • Low-lint face mask • Sterile powder-free gloves • If using a RABS (i.e., a CAI or CACI), disposable gloves should be worn inside the gloves attached to the RABS sleeves. Sterile gloves must be worn over the gloves attached to the RABS sleeve 	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D29.	Is garb replaced immediately if soiled or if integrity is compromised, stored to minimize contamination, and discarded or laundered as appropriate?	USP <797> 3.3 Garbing Requirements Garb must be replaced immediately if it becomes visibly soiled or if its integrity is compromised. Gowns and other garb must be stored in a manner that minimizes contamination (e.g., away from sinks to avoid splashing). When personnel exit the compounding area, garb, except for gowns, cannot be reused and must be discarded or laundered before reuse.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D30.	Does the facility have SOPs that describe the disinfection procedure for reusable goggles, respirators, and other equipment?	USP <797> 3.3 Garbing Requirements The facility's SOPs must describe disinfection procedures for reusing goggles, respirators, and other reusable equipment.	Click or tap here to enter text.

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Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D31.	Do facilities that compound Category 3 CSPs follow additional garbing requirements?	<p>USP <797> 3.3 Garbing Requirements If the facility compounds Category 3 CSPs, additional garbing requirements must be continuously met in the buffer room in which Category 3 CSPs are prepared. The following additional garbing requirements must be followed in the buffer room where Category 3 CSPs are prepared for all personnel regardless of whether Category 3 CSPs are compounded on a given day:</p> <ol style="list-style-type: none"> 1. Do not allow any exposed skin in the buffer room (i.e., face and neck must be covered). 2. All low-lint outer garb must be sterile, including the use of sterile sleeves over gauntlet sleeves when a RABS is used. 3. Disposable garbing items must not be reused, and laundered garb must not be reused without being laundered and resterilized with a validated cycle. 4. The facility’s SOPs must describe disinfection procedures for reusing goggles, respirators, and other reusable equipment. 	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D32.	Is 70% sIPA appropriately applied to gloves and are gloves inspected as required?	<p>USP <797> 3.3 Garbing Requirements Gloves: Application of sterile 70% IPA to gloves must occur immediately before compounding and regularly throughout the compounding process. All gloves must be inspected for holes, punctures, or tears and must be replaced immediately if such defects are detected.</p>	Click or tap here to enter text.

Compliant			#	USP Reference	Notes/Corrective Actions
Yes	No	N/A			
Facilities and Engineering Controls					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D33.	<p>Are facilities designed to meet air quality classifications?</p> <p>USP <797> 4.1.2 Design requirements to maintain air quality: Facilities used for compounding CSPs must be designed so that air quality improves with movement through separate operational areas to the PEC. Classified areas in which the air quality is controlled (see Table 4) include anterooms, buffer rooms, and PECs.</p> <ul style="list-style-type: none"> • Anterooms providing access only to positive-pressure buffer rooms must meet at least ISO Class 8 classification. Anterooms providing access to negative-pressure buffer rooms must meet at least ISO Class 7 classification (see 800). Typically, personnel hand hygiene and garbing procedures, staging of components, and other activities that potentially generate higher levels of particulates are performed in the anteroom. Anterooms are also transition areas to ensure that proper air classification and pressure relationships are maintained between classified and unclassified areas. • A buffer room must meet at least ISO Class 7 air quality. Activities in the buffer room must be controlled to minimize any effects on air quality in the area where CSPs are prepared. • Category 1, Category 2, and Category 3 CSPs must be compounded in an ISO Class 5 or better PEC. If compounding only Category 1 CSPs, the PEC may be placed in an unclassified SCA. 	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D34.	<p>Are the anteroom and buffer room appropriately constructed and equipped with a pressure-differential monitoring system?</p> <p>USP <797> 4.2.1 Types of SECs and design Cleanroom suite: The ISO-classified anteroom and buffer room must be separated from the surrounding unclassified areas of the facility by fixed walls and doors, and controls must be in place to minimize the flow of lower-quality air into the more controlled areas. The classified rooms must be equipped with a pressure-differential monitoring system.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D35.	<p>Does the cleanroom suite have ceiling mounted HEPA filters?</p> <p>USP <797> 4.2.1 Types of SECs and design Cleanroom suite: Air supplied to the cleanroom suite must be introduced through HEPA filters that are located in the ceiling of the buffer room and anteroom.</p>	Click or tap here to enter text.

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Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D36.	If the cleanroom suite does not have low wall returns do smoke studies confirm the absence of stagnant airflow?	USP <797> 4.2.1 Types of SECs and design Cleanroom suite: Air returns in the cleanroom suite must be low on the wall unless a visual smoke study demonstrates an absence of stagnant airflow.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D37.	Are smoke studies and environmental monitoring completed when equipment is moved or other room alterations occur?	USP <797> 4.2.1 Types of SECs and design Cleanroom suite: This smoke study along with environmental monitoring must be repeated whenever a change is made to the placement of equipment within the room or any other alteration is performed within the cleanroom suite that affects the quality of the air (e.g., HVAC alterations, change of HEPA filter units).	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D38.	Does the anteroom have a demarcation method to separate the clean side from the dirty side?	USP <797> 4.2.1 Types of SECs and design Cleanroom suite: The anteroom must have a line of demarcation to separate the clean side from the dirty side. Alternatively, facilities may be designed with two separate anterooms—a dirty anteroom and a clean anteroom. The anteroom is entered through the dirty anteroom, and the clean anteroom is the area closest to the buffer room.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D39.	Are pass-through chambers prohibited from having both doors opened simultaneously?	USP <797> 4.2.1 Types of SECs and design Cleanroom suite: If a pass-through chamber is used, both doors must never be opened at the same time, and doors should be interlocking.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D40.	Are tacky mats prohibited within ISO-classified areas?	USP <797> 4.2.1 Types of SECs and design Cleanroom suite: Tacky mats must not be placed within ISO-classified areas.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D41.	When compounding both sterile and nonsterile preparations are the PECs appropriately placed?	USP <797> 4.2.1 Types of SECs and design Cleanroom suite: If compounding both sterile and nonsterile preparations (e.g., presterilization procedures), the respective PECs must be placed in separate rooms unless those PECs are sufficiently effective that the room can continuously maintain ISO Class 7 classification. If the PECs used for sterile and nonsterile compounding are placed in the same room, they must be placed at least 1 m apart, and particle-generating activity must not be performed when sterile compounding is in process.	Click or tap here to enter text.

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Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D42.	Are SCAs limited to Category 1 CSPs and located away from environmental challenges that could negatively affect air quality?	USP <797> 4.2.1 Types of SECs and design Segregated compounding area: The SCA must be located away from unsealed windows, doors that connect to the outdoors, and traffic flow, all of which may adversely affect the air quality in the PEC. An SCA must not be located where environmental control challenges (e.g., restrooms, warehouses, or food preparation areas) could negatively affect the air quality of the PEC within the SCA. The impact of activities (e.g., patient care activities) that will be conducted around or adjacent to the SCA must be considered carefully when designing such an area.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D43.	Do PECs meet ISO Class 5 under dynamic conditions and maintain appropriate airflow?	USP <797> 4.2.2 The CSP compounding environment The PEC must be certified to meet ISO Class 5 or better conditions (see <i>Table 4</i>) during dynamic operating conditions and must be designed to minimize the risk of contamination during compounding of CSPs. Unidirectional airflow must be maintained in the PEC. HEPA-filtered air must be supplied by the PEC at a velocity sufficient to sweep particles away from critical sites and maintain unidirectional airflow during operations.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D44.	Is there sufficient room to clean around the PEC?	USP <797> 4.2.3 Types of PECs and placement Placement of the PEC must allow for cleaning around the PEC.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D45.	Are LAFS located in areas appropriate for the type of compounding performed and are smoke studies completed as required?	USP <797> 4.2.3 Types of PECs and placement Placement of LAFS The LAFS must be located out of traffic patterns and away from room air currents that could disrupt the intended airflow patterns inside the PEC. If used to prepare Category 2 or Category 3 CSPs, the LAFS must be located within a cleanroom suite with an ISO Class 7 or better buffer room with an ISO Class 8 or better anteroom. A dynamic airflow smoke pattern test must be performed in the PEC initially and at least every 6 months to ensure that 1) the LAFS is properly placed into the facility and 2) compounders understand how to utilize the unidirectional airflow to maintain first air in the DCA.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D46.	Is air exchange into the CAI HEPA filtered?	USP <797> 4.2.3 Types of PECs and placement Compounding aseptic isolator Air exchange into the CAI from the surrounding environment must not occur unless the air has first passed through a HEPA filter.	Click or tap here to enter text.

Compliant			#		USP Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D47.	Are RABS appropriately located according to the type of compounding performed?	USP <797> 4.2.3 Types of PECs and placement Placement of RABS If used to prepare only Category 1 CSPs, the ISO Class 5 environment may be achieved by placing the RABS in an unclassified SCA. If used to prepare Category 2 or Category 3 CSPs, the RABS must be located within a cleanroom suite with an ISO Class 7 or better buffer room with an ISO Class 8 or better anteroom. When a RABS is used, the recovery time after opening the transfer chamber to achieve ISO Class 5 air quality must be documented (e.g., by the manufacturer), and internal procedures must be developed to ensure that adequate recovery time is allowed after opening and closing the RABS, both before and during compounding operations.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D48.	Are transfer chamber recovery time procedures in place to ensure ISO 5 is achieved before and during compounding?	USP <797> 4.2.3 Types of PECs and placement Placement of RABS When a RABS is used, the recovery time after opening the transfer chamber to achieve ISO Class 5 air quality must be documented (e.g., by the manufacturer), and internal procedures must be developed to ensure that adequate recovery time is allowed after opening and closing the RABS, both before and during compounding operations.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D49.	If used to prepare Category 2 or Category 3 CSPs is the pharmaceutical isolator placed in an ISO Class 8 or better room and are dynamic airflow smoke studies performed as required?	USP <797> 4.2.3 Types of PECs and placement Placement of Pharmaceutical Isolators If the pharmaceutical isolator is used to prepare Category 2 or Category 3 CSPs, the pharmaceutical isolator must be placed in an ISO Class 8 or better room. If a robotic enclosure is used as the PEC, or placed within the PEC, a dynamic airflow smoke pattern test must be performed initially and at least every 6 months thereafter to ensure that 1) it is properly integrated into the facility, 2) there is no turbulence or refluxing at any critical site(s), 3) room air does not enter the PEC where sterile products and/or preparations may be exposed, and 4) all processes can be performed without introducing contamination to the DCA(s).	Click or tap here to enter text.

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Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D50.	Do ISO class 7 rooms meet air supply requirements?	<p>USP <797> 4.2.4 Air exchange requirements A minimum of 30 total HEPA-filtered ACPH must be supplied to ISO Class 7 rooms: --The total HEPA-filtered air change rate must be adequate to maintain ISO Class 7 during dynamic operating conditions considering the factors listed above --At least 15 ACPH of the total air change rate in a room must come from the HVAC through HEPA filters located in the ceiling --The HEPA-filtered air from the PEC, when added to the HVAC-supplied HEPA-filtered air, must increase the total HEPA-filtered ACPH to at least 30 ACPH --If the PEC is used to meet the minimum total ACPH requirements, the PEC must not be turned off except for maintenance --Rooms where activity levels are high may require more HEPA-filtered ACPH to maintain ISO Class 7 air quality under dynamic operating conditions --The ACPH from HVAC, ACPH contributed from the PEC, and the total ACPH must be documented on the certification report</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D51.	Do ISO class 8 rooms meet air supply requirements?	<p>USP <797> 4.2.4 Air exchange requirements A minimum of 20 total HEPA-filtered ACPH must be supplied to ISO Class 8 rooms: --The total HEPA-filtered air change rate must be adequate to maintain ISO Class 8 under dynamic operating conditions considering the factors listed above --At least 15 ACPH of the total air change rate in a room must come from the HVAC through HEPA filters located in the ceiling --Rooms where activity levels are high may require more HEPA-filtered ACPH to maintain ISO Class 8 air quality under dynamic operating conditions --The total ACPH must be documented on the certification report</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D52.	Is the pressure differential between the anteroom and the unclassified areas at least 0.020-inch water column?	<p>USP <797> 4.2.5 Establishing and maintaining pressure differentials The pressure differential between the anteroom and the unclassified area must not be less than 0.020-inch water column.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D53.	Are pressure differential monitoring device continuously monitored?	<p>USP <797> 4.2.5 Establishing and maintaining pressure differentials Where pressure differentials are required, a pressure differential monitoring device must be used to continuously monitor the pressure differentials.</p>	Click or tap here to enter text.

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Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D54.	Are results from the pressure monitoring device reviewed and documented at least daily on days when compounding occurs?	USP <797> 4.2.5 Establishing and maintaining pressure differentials The quantitative results from the pressure monitoring device must be reviewed and documented at least daily on the days when compounding is occurring.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D55.	When preparing Category 2 or Category 3 CSPs from nonsterile components are presterilization requirements met?	USP <797> 4.2.6 Facilities preparing Category 2 or Category 3 CSPs from nonsterile starting components If preparing Category 2 or Category 3 CSP from nonsterile component(s), presterilization procedures, such as weighing and mixing, must be completed in an ISO Class 8 or better environment (e.g., anteroom or buffer room). Presterilization procedures must be performed in single-use containment glove bags, containment ventilated enclosures (CVEs), BSCs, or CACIs to minimize the risk of airborne contamination. CVEs, BSCs, or CACIs used for presterilization procedures must be certified at least every 6 months. Presterilization procedures must not adversely affect the required air quality of the SEC as demonstrated during certification under dynamic operating conditions.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D56.	Is the cleanroom suite appropriately constructed to facilitate cleaning and minimize spaces where contaminants can accumulate?	USP <797> 4.3.1 Cleanroom suite The surfaces of ceilings, walls, floors, doors, door frames, fixtures, shelving, work surfaces, counters, and cabinets in the classified area must be smooth, impervious, free from cracks and crevices, and nonshedding so they can be cleaned and disinfected and to minimize spaces in which microorganisms and other contaminants can accumulate. Junctures between the ceiling and the walls and between the walls and the floor must be sealed to eliminate cracks and crevices where dirt can accumulate. If ceilings consist of inlaid panels, the panels must be caulked around each panel to seal them to the support frame. Walls must be constructed of, or may be covered with, durable material (e.g., epoxy painted walls or heavy-gauge polymer) and the integrity of the surface must be maintained. Panels must be joined together and sealed to each other and the support structure. Floors must include coving to the sidewall, or the juncture between the floor and the wall must be caulked. If overhangs or ledges are present, they must be easily cleanable. The exterior lens surface of ceiling light fixtures must be smooth, mounted flush, and sealed. Any other penetrations through the ceiling or walls must be sealed.	Click or tap here to enter text.

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Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D57.	Is the SCA and the surfaces within the SCA clean, uncluttered, and dedicated to compounding?	USP <797> 4.3.2 SCA The SCA and all surfaces (e.g., walls, floors, counters, and equipment) in the SCA must be clean, uncluttered, and dedicated to compounding. If overhangs or ledges are present, they must be easily cleanable.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D58.	Are compounding facilities designed and maintained so that activities such as hand hygiene and garbing do not adversely affect PEC function?	USP <797> 4.4 Water Sources The facility where CSPs are prepared must be designed so that activities such as hand hygiene and garbing will not adversely affect the ability of the PEC to function as designed. Sinks should be hands-free use. Surfaces of the sink(s) must be cleaned and disinfected each day of use, and a sporicidal disinfectant must be applied at least monthly (see 7.1 <i>Agents and Supplies for Cleaning, Disinfecting, and Applying Sporicidal Disinfectants</i>).	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D59.	Are water sources appropriately placed?	USP <797> 4.4 Water Sources In facilities with a cleanroom suite, the sink used for hand hygiene may be placed either inside or outside of the anteroom. If the sink is located outside of the anteroom, it must be located in a clean space to minimize the risk of bringing contaminants into the anteroom. If the sink is located inside the anteroom, it may be placed on either the clean side or the dirty side of the anteroom. [NOTE—The order of hand washing and garbing depends on the placement of the sink (see 3.2 Hand Hygiene and 3.3 Garbing Requirements)]. The buffer room must not contain plumbed water sources [e.g., sink(s), eyewash(es), shower(s), or floor drain(s)]. The anteroom must not contain floor drain(s). In a facility with an SCA design, a hand-washing sink must be placed not closer than 1 m to the PEC and may be either inside the SCA or in close proximity to the SCA.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D60.	Are items other than furniture, equipment, and other materials necessary for performing compounding activities cleanable and installed not to impact air quality?	USP <797> 4.5 Placement and Movement of Materials Only furniture, equipment, and other materials necessary for performing compounding activities are permitted in a classified area or SCA, and they should be low-shedding and easily cleaned and disinfected. Their number, design, location, and manner of installation must not impact environmental air quality and must promote effective cleaning and disinfecting.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D61.	Are shipping cartons, corrugated cardboard, or uncoated cardboard prohibited in classified areas or SCAs?	USP <797> 4.5 Placement and Movement of Materials No shipping carton(s) or other corrugated or uncoated cardboard are allowed in a classified area or SCA.	Click or tap here to enter text.

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Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D62.	Are transport carts appropriately constructed to facilitate cleaning?	USP <797> 4.5 Placement and Movement of Materials Carts used to transport components or equipment into classified areas must be constructed from nonporous materials with cleanable casters and wheels to promote mobility and ensure ease of cleaning and disinfection. In a cleanroom suite, carts must not be moved from the dirty side to the clean side of the anteroom unless the entire cart, including casters, is cleaned and disinfected.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D63.	Is proper placement of equipment in the PEC verified by a dynamic airflow smoke pattern test initially and when equipment is moved?	USP <797> 4.5 Placement and Movement of Materials Only equipment necessary for performing compounding activities is permitted in the PEC. Proper placement of equipment in a PEC must be initially verified by a dynamic airflow smoke pattern test to demonstrate minimal disruption in airflow. The dynamic airflow smoke pattern test must be repeated if equipment is placed in a different location.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D64.	Do items used in a classified area or SCA remain in place except for maintenance?	USP <797> 4.5 Placement and Movement of Materials Equipment and other items used in a classified area or SCA should not be removed except for calibration, servicing, cleaning, or other activities associated with maintenance. If removed, these items must be cleaned and wiped with sterile 70% IPA or a suitable disinfectant before they are returned to the classified area or the SCA.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D65.	Are materials exposed in patient care and treatment areas prohibited from entry into anterooms, buffer rooms, or SCAs unless thoroughly cleaned and disinfected?	USP <797> 4.5 Placement and Movement of Materials Materials necessary for performing compounding activities that have been exposed in patient care and treatment areas must not enter anterooms, buffer rooms, or segregated compounding areas unless thoroughly cleaned and disinfected.	Click or tap here to enter text.

Compliant			#		USP Reference	Notes/Corrective Actions
Yes	No	N/A				
Certification and Recertification						
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D66.	Do certifications of classified areas and PECs meet all requirements?	<p>USP <797> 5. Certification and Recertification Certification of the classified areas including the PEC must be performed initially, and recertification must be performed at least every 6 months and must include:</p> <ul style="list-style-type: none"> • <i>Airflow testing:</i> Airflow testing is performed to determine acceptability of the air velocity, the room air exchange rate, and the room pressure differential in doorways between adjacent rooms to ensure consistent airflow and that the appropriate quality of air is maintained under dynamic operating conditions. The ACPH from HVAC, ACPH contributed from the PEC, and the total ACPH must be documented on the certification report. • <i>HEPA filter integrity testing:</i> HEPA filters must be leak tested at the factory and then leak tested again after installation and as part of recertification. • <i>Total particle count testing:</i> (See 5.1 Total Airborne Particle Sampling.) Total particle count testing must be performed under dynamic operating conditions using calibrated electronic equipment. • <i>Dynamic airflow smoke pattern test:</i> Smoke pattern tests must be performed for each PEC during dynamic operating conditions to demonstrate unidirectional airflow and sweeping action over and away from the preparation(s). 	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D67.	Are classified areas recertified following changes to the classified areas or PECs?	<p>USP <797> 5. Certification and Recertification Classified areas additionally must be recertified if there are changes to the area such as redesign, construction, replacement or relocation of any PEC, or alteration in the configuration of the room that could affect airflow or air quality.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D68.	Are certification and recertification records reviewed by the designated person(s)?	<p>USP <797> 5. Certification and Recertification All certification and recertification records must be reviewed by the designated person(s) to ensure that the classified environments meet the minimum requirements in this chapter.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D69.	Is the number of personnel present in each PEC and SEC documented for total particle-count and dynamic airflow smoke-pattern tests?	<p>USP <797> 5. Certification and Recertification The number of personnel present in each PEC and SEC during total particle-count tests and dynamic airflow smoke-pattern tests must be documented. Records must be maintained in accordance with the requirements in 20. <i>Documentation.</i></p>	Click or tap here to enter text.

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Compliant			#		USP Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D70.	Is a corrective action plan implemented and documented if out-of-range results occur?	USP <797> 5. Certification and Recertification A corrective action plan must be implemented and documented in response to any out-of-range results. Data collected in response to corrective actions must be reviewed to confirm that the actions taken have been effective.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D71.	Do SOPs describe particle sampling sites and procedures?	USP <797> 5.1 Total Airborne Particle Sampling Total airborne particle sampling sites must be selected in all classified areas. Measurements of total airborne particles must be taken in each PEC at locations where there is greatest risk to the exposed CSPs, containers, and closures. All sampling sites and procedures must be described in the facility's SOPs.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D72.	If action levels of air samples are exceeded is the cause investigated and corrective actions taken and documented.	USP <797> 5.1 Total Airborne Particle Sampling Data evaluation and action levels: If levels measured during the total air sampling program exceed the criteria in <i>Table 4</i> for the ISO classification of the area sampled, the cause must be investigated and corrective action taken and documented. Data collected in response to corrective actions must be reviewed to confirm that the actions taken have been effective. Some examples of corrective action include process or facility improvements or HEPA filter replacement or repair. The extent of the investigation should be consistent with the deviation and should include an evaluation of trends.	Click or tap here to enter text.
Microbiological Air and Surface Monitoring						
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D73.	Is sampling data reviewed for trends in conjunction with personnel data?	USP <797> 6.1 General Monitoring Requirements Regular review of the sampling data must be performed to detect trends and the results of the review must be documented. In addition, results from microbiological air and surface sampling must be reviewed in conjunction with personnel data (i.e., training records, visual observations, competency assessments) to assess the state of control and to identify potential risks of contamination.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D74.	Is corrective action taken and resulting data reviewed in response to adverse findings?	USP <797> 6.1 General Monitoring Requirements Corrective action in response to any adverse findings is required to maintain the necessary environmental quality for preparation of CSPs. Data must also be reviewed following corrective actions to confirm that the actions taken have been effective in achieving the required microbiological air and surface quality levels (see <i>Table 4, Table 7, and Table 8</i>).	Click or tap here to enter text.

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Compliant			#	USP Reference	Notes/Corrective Actions
Yes	No	N/A			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D75.	<p>USP <797> 6.1 General Monitoring Requirements Microbiological air and surface monitoring must be performed initially for sterile compounding facilities to establish a baseline level of environmental quality. After initial sampling, the environment in which sterile compounding activities are performed must be monitored according to the minimum frequencies described in this section to ensure that the environment remains suitable for sterile compounding. Microbiological air and/or surface monitoring must be conducted in all classified areas during dynamic operating conditions to confirm that the required environmental quality is maintained. In addition to the specific sampling frequencies described in this section, sampling must be performed in the following circumstances:</p> <ul style="list-style-type: none"> • In conjunction with the certification of new facilities and equipment • After any servicing of facilities or equipment (see 4. <i>Facilities and Engineering Controls</i>) • In response to identified problems (e.g., positive growth in sterility tests of CSPs) • In response to identified trends (e.g., repeated positive gloved fingertip and thumb sampling results, failed media fill testing, or repeated observations of air or surface contamination) <p>In response to changes that could impact the sterile compounding environment (e.g., change in cleaning agents) The microbiological air and surface monitoring program must be clearly described in the facility's SOPs, which must include a diagram of the sampling locations, procedures for collecting samples, frequency of sampling, size of samples (e.g., surface area, volume of air), time of day of sampling in relation to activities in the compounding area, and action levels that will trigger corrective action. To obtain air and surface samples that are representative of the typical compounding conditions at the facility, in all PECs and classified rooms, air sampling must be conducted during dynamic operating conditions and surface sampling should be performed at the end of a compounding activity or shift but before the area has been cleaned and disinfected. The monitoring program must be designed and conducted in a manner that minimizes the chance that the sampling itself will contribute to contamination of the CSP or the environment. All impaction air samplers must be serviced and calibrated as recommended by the manufacturer.</p>	Click or tap here to enter text.

Compliant			#	USP Reference	Notes/Corrective Actions										
Yes	No	N/A													
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D76.	<p>USP <797> 6.2.1 Viable air sampling—timing and locations Volumetric active air sampling of all classified areas using an impaction air sampler must be conducted in each classified area [e.g., ISO Class 5 PEC and ISO Class 7 and 8 room(s)] during dynamic operating conditions. For entities compounding Category 1 and Category 2 CSPs, this must be completed at least every 6 months. For entities compounding any Category 3 CSPs, this must be completed within 30 days prior to the commencement of any Category 3 compounding and at least monthly thereafter regardless of the frequency of compounding Category 3 CSPs. Air sampling sites must be selected in all classified areas.</p>	Click or tap here to enter text.										
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D77.	<p>USP <797> 6.2.2 Viable air sampling procedures When conducting sampling of the PEC, care should be taken to avoid disturbing unidirectional airflow. See <i>Box 5</i> for active air sampling procedures. A general microbiological growth media that supports the growth of bacteria and fungi must be used (e.g., TSA). COAs from the manufacturer must verify that the sampling media devices meet the expected growth promotion, pH, and sterilization requirements. The incubator temperature must be monitored during incubation, either manually or by a continuous recording device, and the results must be reviewed and documented as described in the facility’s SOPs. The incubator must be placed in a location outside of the sterile compounding area.</p>	Click or tap here to enter text.										
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D78.	<p>USP <797> 6.2.3 Viable air sampling data evaluation and action levels</p> <table border="1" data-bbox="800 1062 1409 1252"> <thead> <tr> <th colspan="2">Table 7. Action Levels for Viable Airborne Particle Air Sampling</th> </tr> <tr> <th>ISO Class</th> <th>Air Sampling Action Levels</th> </tr> </thead> <tbody> <tr> <td>5</td> <td>>1</td> </tr> <tr> <td>7</td> <td>>10</td> </tr> <tr> <td>8</td> <td>>100</td> </tr> </tbody> </table> <p>If levels measured during the viable air monitoring program exceed the levels in <i>Table 7</i> for the ISO classification levels of the area sampled, the cause must be investigated and corrective action must be taken.</p>	Table 7. Action Levels for Viable Airborne Particle Air Sampling		ISO Class	Air Sampling Action Levels	5	>1	7	>10	8	>100	Click or tap here to enter text.
Table 7. Action Levels for Viable Airborne Particle Air Sampling															
ISO Class	Air Sampling Action Levels														
5	>1														
7	>10														
8	>100														
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D79.	<p>USP <797> 6.3 Monitoring Surfaces for Viable Particles All sampling sites and procedures must be described in the facility’s SOPs.</p>	Click or tap here to enter text.										

Compliant			#	USP Reference	Notes/Corrective Actions
Yes	No	N/A			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D80.	<p>USP <797> 6.3.1 Surface sampling—timing and locations Each classified area, including each room and the interior of each ISO Class 5 PEC and pass-through chambers connecting to classified areas, must be sampled for microbial contamination using a risk-based approach. For entities compounding Category 1 and Category 2 CSPs, surface sampling of all classified areas, and pass-through chambers connecting to classified areas, must be conducted at least monthly (see <i>Microbiological Control and Monitoring of Aseptic Processing Environments</i> <1116>). For entities compounding any Category 3 CSPs, surface sampling of all classified areas, and pass-through chambers connecting to classified areas, must be completed prior to assigning a BUD longer than the limits established in <i>Table 13</i>, and at least weekly (see <1116>) on a regularly scheduled basis regardless of the frequency of compounding Category 3 CSPs. Additionally, surface sampling must be conducted within the PEC used to prepare Category 3 CSPs, at the end of each batch before cleaning and disinfection occurs, unless a self-enclosed robotic device is used. When a self-enclosed robotic device is used as the PEC to prepare Category 3 CSPs, surface sampling must be conducted at least once daily at the end of compounding operations, before cleaning and disinfection occurs, unless a self-enclosed robotic device is used. When a self-enclosed robotic device is used as the PEC to prepare Category 3 CSPs, surface sampling must be conducted at least once daily at the end of compounding operations, before cleaning and disinfection occurs.</p>	Click or tap here to enter text.

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Compliant			#	USP Reference	Notes/Corrective Actions
Yes	No	N/A			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D81.	<p>Does surface sampling media support growth, meet requirements, and are temperatures monitored during incubation with results documented per facility SOPs?</p> <p>USP <797> 6.3.2 Surface sampling procedures Surface sampling media devices (e.g., plates, paddles, or slides) containing microbial growth media must be used for sampling flat surfaces. COAs from the manufacturer must verify that the sampling media devices meet the expected growth promotion, pH, and sterilization requirements. Surface sampling media devices must contain general microbial growth media (e.g., TSA) supplemented with neutralizing additives (e.g., lecithin and polysorbate 80) to neutralize the effects of any residual disinfecting agents. Surface sampling media devices must have a raised convex surface. After sampling, the sampled area must be thoroughly cleaned and disinfected (see 7. <i>Cleaning, Disinfecting, and Applying Sporicidal Disinfectants and Sterile 70% IPA</i>). The incubator temperature must be monitored during incubation, either manually or by a continuous recording device, and the results must be reviewed and documented. The incubator must be placed in a location outside of the sterile compounding area.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D82.	<p>Are results of surface sampling evaluated and corrective action taken when required?</p> <p>USP <797> 6.3.3 Surface sampling data evaluation and action levels If two sampling media devices are collected at a single location, all recovered growth on each must be documented and action levels applied to each sampling media device separately. If levels measured during surface sampling exceed the levels in <i>Table 8</i>, an attempt must be made to identify any microorganism recovered to the genus level (see <1113>) with the assistance of a microbiologist. Data collected in response to corrective actions must be reviewed to confirm that the actions taken have been effective. The corrective action plan must be dependent on the cfu count and the microorganism recovered. The corrective action plan must be documented.</p>	Click or tap here to enter text.

Compliant			#	USP Reference	Notes/Corrective Actions
Yes	No	N/A			
Cleaning, Disinfecting, and Applying Sporicidal Disinfectants and Sterile 70% IPA					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D83.	<p>USP <797> 7. Cleaning, Disinfecting, and Applying Sporicidal Disinfectants and Sterile 70% IPA Additionally, in a PEC, sterile 70% IPA must be applied after cleaning and disinfecting, or after the application of a one-step disinfectant cleaner or sporicidal disinfectant, to remove any residue. Sterile 70% IPA must also be applied immediately before initiating compounding. During the compounding process sterile 70% IPA must be applied to the horizontal work surface, including any removable work trays, of the PEC at least every 30 min if the compounding process takes 30 min or less. If the compounding process takes more than 30 min, compounding must not be disrupted, and the work surface of the PEC must be disinfected immediately after compounding.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D84.	<p>USP <797> 7. Cleaning, Disinfecting, and Applying Sporicidal Disinfectants and Sterile 70% IPA Surfaces must be cleaned prior to being disinfected with an EPA-registered disinfectant (or equivalent for entities outside the US) unless an EPA-registered (or equivalent for entities outside the US) one-step disinfectant cleaner is used to accomplish both the cleaning and disinfection in one step.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D85.	<p>USP <797> 7. Cleaning, Disinfecting, and Applying Sporicidal Disinfectants and Sterile 70% IPA All cleaning and disinfecting activities must be performed by trained and appropriately garbed personnel using facility-approved agents and procedures, which must be described in written SOPs. Personnel must be trained if there are any changes in the cleaning and disinfecting procedures. The frequency, method(s), and location(s) of cleaning, disinfecting, and applying sporicidal disinfectants must be established in written SOPs, in accordance with the manufacturer’s instructions and must be followed by all cleaning personnel.</p>	Click or tap here to enter text.

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Compliant			#		USP Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D86.	Are cleaners, disinfectants, and sporicides applied according to the facility's SOPs?	USP <797> 7. Cleaning, Disinfecting, and Applying Sporidical Disinfectants and Sterile 70% IPA Cleaning must be performed in the direction of clean to dirty areas. The same floor mop may be used in both the buffer and anteroom, but only in that order. The frequency, method(s), and location(s) of cleaning, disinfecting, and applying sporidical disinfectants must be established in written SOPs, in accordance with the manufacturer's instructions and must be followed by all cleaning personnel. The manufacturer's directions or published data for the minimum contact time must be followed for each of the cleaning, disinfecting, and sporidical disinfectants used. When sterile 70% IPA is used, it must be allowed to dry. All cleaning, disinfecting, and application of sporidical disinfectants must be documented according to the facility's SOPs.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D87.	Are cleaning and disinfecting agents allowed proper dwell time?	USP <797> 7.1 Agents and Supplies for Cleaning, Disinfecting, and Applying Sporidical Disinfectants 7.1.1 Agents Considerations when selecting and using disinfectants include their antimicrobial activity, inactivation by organic matter, residue, shelf life, preparation requirements of the agent, and suitability for surfaces being disinfected. After the disinfectant or sporidical disinfectant is applied to the surface, the agent must be allowed to dwell for the minimum contact time specified by the manufacturer.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D88.	Are all agents used within a PEC sterile?	USP <797> 7.1 Agents and Supplies for Cleaning, Disinfecting, and Applying Sporidical Disinfectants 7.1.1 Agents Cleaning, disinfecting and sporidical agents used within the PEC must be sterile. When diluting concentrated cleaning and disinfecting agents for use in the PEC, sterile water must be used.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D89.	Are all cleaning and disinfecting supplies low lint and are disposable supplies discarded after cleaning activity?	USP <797> 7.1 Agents and Supplies for Cleaning, Disinfecting, and Applying Sporidical Disinfectants 7.1.2 Supplies All cleaning and disinfecting supplies (e.g., wipers, sponges, pads, and mop heads) with the exception of tool handles and holders must be low lint. If disposable cleaning supplies are used, they must be discarded after each cleaning activity.	Click or tap here to enter text.

Compliant			#	USP Reference	Notes/Corrective Actions
Yes	No	N/A			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D90.	<p>Do reusable cleaning tools remain in the classified area or SCA and are tools cleaned and disinfected before and after each use?</p> <p>USP <797> 7.1 Agents and Supplies for Cleaning, Disinfecting, and Applying Sporicidal Disinfectants 7.1.2 Supplies Reusable cleaning tools must be made of cleanable materials (e.g., handles should not be made of wood or any other porous material) and must be cleaned and disinfected before and after each use. Reusable cleaning tools must be dedicated for use in the classified areas or SCA and must not be removed from these areas except for disposal. Cleaning supplies used in the classified areas and SCAs must be disposed of in a manner that minimizes the potential for dispersing contaminants into the air (e.g., with minimal agitation, away from work surfaces).</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D91.	<p>Is the PEC interior cleaned and disinfected at the minimum frequencies following required procedures?</p> <p>USP <797> 7.2 Procedures for Cleaning, Disinfecting, and Applying Sporicidal Disinfectants and Sterile 70% IPA in the PEC Clean, disinfect, and apply a sporicidal disinfectant to equipment and all interior surfaces in the PEC at the minimum frequencies specified in Table 10. See Box 7 and Box 8 for procedures for cleaning, disinfecting, and applying a sporicidal disinfectant in the PEC.</p>	Click or tap here to enter text.
Introducing Items into the SEC and PEC					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D92.	<p>Are all items wiped with a sporicidal disinfectant, EPA-registered disinfectant, or sIPA 70% prior being introduced into the clean side of an anteroom, placed in a pass-through, or brought into the SCA?</p> <p>USP <797> 8.1 Introducing Items into the SEC Before any item is introduced into the clean side of anteroom(s), placed into pass-through chamber(s), or brought into the SCA, providing that packaging integrity will not be compromised, it must be wiped with a sporicidal disinfectant, EPA-registered disinfectant, or sterile 70% IPA using low-lint wipers by personnel wearing gloves. If an EPA-registered disinfectant or sporicidal disinfectant is used, the agent must be allowed to dwell for the minimum contact time specified by the manufacturer. If sterile 70% IPA is used, it must be allowed to dry. The wiping procedure should not compromise the packaging integrity or render the product label unreadable.</p>	Click or tap here to enter text.

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Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D93.	Are items wiped with sIPA 70% prior to introduction into the PEC?	USP <797> 8.2 Introducing Items into the PEC Just before any item is introduced into the PEC, it must be wiped with sterile 70% IPA using sterile low-lint wipers and allowed to dry before use. When sterile items are received in sealed containers designed to keep them sterile until opening, the sterile items may be removed from the covering as the supplies are introduced into the ISO Class 5 PEC without the need to wipe the individual sterile supply items with sterile 70% IPA. The wiping procedure must not render the product label unreadable.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D94.	Are critical sites wiped with sIPA 70% to remove contaminants and allowed to dry prior to use in the PEC?	USP <797> 8.3 Use of Sterile 70% IPA on Critical Sites within the PEC Critical sites (e.g., vial stoppers, ampule necks, and intravenous bag septums) must be wiped with sterile 70% IPA in the PEC to provide both chemical and mechanical actions to remove contaminants. The sterile 70% IPA must be allowed to dry before personnel enter or puncture stoppers and septums or break the necks of ampules.	Click or tap here to enter text.
Equipment, Supplies, and Components						
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D95.	Are SOPs for equipment use, cleaning, and maintenance followed?	USP <797> 9.1 Equipment Equipment that must be brought into classified areas must be wiped with a sporicidal disinfectant, EPA-registered disinfectant, or sterile 70% IPA using low-lint wipers. Equipment must be placed in a manner that facilitates sterile compounding operations. The equipment must be capable of operating properly and within required performance parameters. Compounding personnel must follow established SOPs for the calibration, maintenance, cleaning, and use of the equipment based on the manufacturer’s recommendations. Personnel must maintain records from equipment calibration, verification, and maintenance in accordance with the requirements in 20. <i>Documentation.</i>	Click or tap here to enter text.

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Compliant			#		USP Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D96.	When using ACDs or similar equipment, do personnel conduct and document accuracy assessments on days the equipment is used?	USP <797> 9.1 Equipment Before using ACDs or other similar equipment, compounding personnel must conduct an accuracy assessment before the first use and again each day the equipment is used to compound CSPs. The precision of the equipment can be monitored based on an assessment of day-to-day variations in its accuracy measures. Compounding personnel must maintain a daily record of the accuracy measurements on the days the equipment is in use. Corrective actions must be implemented if accuracy measurements are outside the manufacturer’s specification.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D97.	Are components that could generate airborne particles evaluated to determine if manipulations must be performed in a PEC or other closed system processing device in accordance with facility SOPs?	USP <797> 9.1 Equipment Weighing, measuring, or otherwise manipulating components that could generate airborne chemical particles (e.g., active pharmaceutical ingredients [APIs], added substances, conventionally manufactured products) must be evaluated to determine if these activities must be performed in a PEC or other closed system processing device (e.g., single use containment glove bag) to reduce the potential exposure to personnel or contamination of the facility or CSPs (See 4.2.6 <i>Facilities preparing Category 2 or Category 3 CSPs from nonsterile starting component(s)</i>). The process evaluation must be carried out in accordance with the facility’s SOPs and the assessment must be documented.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D98.	Are supplies that come into direct contact with CSPs sterile and depyrogenated?	USP <797> 9.2 Supplies Supplies (e.g., beakers, utensils, needles, syringes, filters, and tubing sets) should be of suitable composition such that the surfaces that contact components are not reactive or sorptive. Supplies in direct contact with the CSP must be sterile and depyrogenated.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D99.	Do personnel follow facility SOPs which address CSP component selection, receipt, handling, and storage?	USP <797> 9.3 Components Compounding personnel must follow the facility’s SOPs, which must address the selection, receipt, evaluation, handling, storage, and documentation of all CSP components, including all ingredients and container closures.	Click or tap here to enter text.

Compliant			#	USP Reference	Notes/Corrective Actions
Yes	No	N/A			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D100.	<p>USP <797> 9.3.1 Component selection When APIs are used: --Must comply with the criteria in the USP–NF monograph, if one exists --Must have a COA that includes the specifications (e.g., compendial requirements for quality) and that test results for the component show that the API meets expected quality --In the United States, must be manufactured by an FDA-registered facility --Outside of the United States, must comply with the laws and regulations of the applicable regulatory jurisdiction For all components other than APIs: --Must comply with the criteria in the USP–NF monograph, if one exists --Must be accompanied by documentation (e.g., COA, labeling) that includes the specifications and test results and shows that the component meets the specifications --In the US, should be manufactured by an FDA-registered facility --If a component cannot be obtained from an FDA-registered facility, the designated person(s) must select an acceptable and reliable source (see Good Distribution Practices for Bulk Pharmaceutical Excipients (1197)). --The compounding facility must establish the identity, strength, purity, and quality of the ingredients obtained from that supplier by reasonable means. Reasonable means may include but are not limited to visual inspections, evaluation of a COA supplied by the manufacturer, and/or verification by analytically testing a sample to determine conformance with the COA or other specifications. Outside of the US, must comply with the laws and regulations of the applicable regulatory jurisdiction All APIs and other components used must be evaluated for suitability for use in sterile drug preparation. Components labeled with “not for pharmaceutical use”, “not for injectable use”, “not for human use” or an equivalent statement must not be used to compound for these purposes.</p>	Click or tap here to enter text.

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Compliant			#		USP Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D101.	Is documentation available for sterilization and depyrogenation of containers and closures?	USP <797> 9.3.1 Component selection Each lot of commercially available sterile, depyrogenated containers and container closure systems must be accompanied by a COA or other documentation showing conformance with established specifications (i.e., sterility and depyrogenation requirements). If sterilization and depyrogenation of supplies or container closure systems are performed on site, the efficacy of each process must be established and documented (see <i>Sterilization of Compendial Articles (1229)</i>).	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D102.	Are external packaging, labeling and condition of components examined upon receipt and are components rejected if unacceptable quality?	USP <797> 9.3.2 Component receipt Upon receipt of each lot of a component, the external packaging must be examined for evidence of deterioration and other aspects of unacceptable quality. Facility personnel must verify the labeling and condition of the component [e.g., whether the outer packaging is damaged and whether temperature-sensing indicators show that the component has been exposed to excessive temperature(s)]. Any component found to be of unacceptable quality must be promptly rejected, clearly labeled as rejected, and segregated from active stock to prevent use before appropriate disposal. Any other lots of that component from that vendor must be examined to determine whether other lots have the same defect.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D103.	Are APIs which lack a manufacturer's expiration date marked with the date of receipt and assigned a conservative expiration date?	USP <797> 9.3.2 Component receipt The date of receipt by the compounding facility must be clearly marked on each API or added substance package that lacks a vendor expiration date. Packages of components (i.e., API and added substances) that lack a vendor's expiration date must be assigned a conservative expiration date, not to exceed 1 year after receipt by the compounding facility.	Click or tap here to enter text.

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Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D104.	Are components properly evaluated prior to use?	USP <797> 9.3.3 Component evaluation before use Compounding personnel must ascertain before use that components for CSPs are of the correct identity, appropriate quality, within expiry date and have been stored under appropriate conditions. All components must be reinspected before use. All packages must be reinspected to detect container breaks, looseness of the cap or closure, and deviation from the expected appearance, aroma, and/or texture of the contents that might have occurred during storage. Sterile container closures must be visually reinspected to ensure that they are free from defects that could compromise sterility and that they are otherwise suitable for their intended use. Any component found to be of unacceptable quality must be promptly rejected, clearly labeled as rejected, and segregated from active stock to prevent use before appropriate disposal. Any other lots of that component from that vendor must be examined to determine whether other lots have the same defect.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D105.	Are components handled and stored as required?	USP <797> 9.3.4 Component handling and storage All components must be handled and stored in a manner that prevents contamination, mix-ups, and deterioration. Components must be stored in closed containers under temperature, humidity, and lighting conditions consistent with those indicated in official monographs or specified by the suppliers and/or manufacturers. Personnel must monitor temperature in the area(s) where components are stored either manually at least once daily on days that the facility is open or by a continuous temperature recording device to determine whether the temperature remains within the appropriate range. The results of the temperature readings must be documented on a temperature log or stored in the continuous recording device and must be retrievable. All monitoring equipment must be calibrated or verified for accuracy as recommended by the manufacturer or every 12 months if not specified by the manufacturer.	Click or tap here to enter text.

Compliant			#	USP Reference	Notes/Corrective Actions
Yes	No	N/A			
Sterilization and Depyrogenation					
<p>If the facility compounds preparations from nonsterile components or if the compounded preparation comes into contact with nonsterile devices, please complete the Sterilization and Depyrogenation section of the worksheet. If the facility does not engage in these activities, please skip this section, and continue with the next section Master Formulation and Compounding Records.</p>					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D106.	<p>USP <797> 10. Sterilization and Depyrogenation Injectable compounded preparations that contain nonsterile components or that come into contact with nonsterile devices (e.g., containers, tubing) during any phase of the compounding procedure must be sterilized within 6 h after completing the preparation to minimize the generation of bacterial endotoxins in CSPs. A description of the terminal sterilization and depyrogenation process, including the temperature, pressure (if applicable), duration, permissible load conditions for each cycle, and the use of biological indicators and endotoxin challenge vials (ECVs) must be included in the facility's SOPs. SOPs must include training and competency of personnel on all sterilization methods and equipment used by the facility. In addition, the SOPs must include a schedule and method for establishing and verifying the effectiveness of the terminal sterilization and depyrogenation methods selected, as well as the methods for maintaining and cleaning the sterilizing and depyrogenation equipment.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D107.	<p>USP <797> 10.1 Depyrogenation Dry heat depyrogenation must be used to render glassware, metal, and other thermostable containers and components pyrogen free. The duration of the exposure period must include sufficient time for the items to reach the depyrogenation temperature. The items must remain at the depyrogenation temperature for the duration of the depyrogenation period. The effectiveness of the dry heat depyrogenation cycle must be established initially and verified annually using ECVs to demonstrate that the cycle is capable of achieving a ≥3-log reduction in endotoxins (see Bacterial Endotoxins Test (85)). The effectiveness of the depyrogenation cycle must be re-established if there are changes to the depyrogenation cycle described in SOPs (e.g., changes in load conditions, duration, or temperature). This verification must be documented. Items that are not thermostable must be depyrogenated by multiple rinses with sterile, nonpyrogenic water (e.g., <i>Sterile Water for Injection</i> or <i>Sterile Water for Irrigation</i>) and then thoroughly drained or dried immediately before use in compounding See <i>Depyrogenation by Rinsing</i> (1228.4).</p>	Click or tap here to enter text.

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Compliant			#		USP Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D108.	Does the designated person ensure appropriate sterilizing filters are used and tested to meet the requirements?	<p>USP <797> 10.2 Sterilization by Filtration Sterilizing filters must be sterile, depyrogenated, have a nominal pore size of 0.22 µm or smaller, and be appropriate for pharmaceutical use. Sterilizing filters with labeling that states “for laboratory use only” or a similar statement must not be used for compounding CSPs. Sterilizing filters must be certified by the manufacturer to retain at least 107 microorganisms of a strain of <i>Brevundimonas diminuta</i> per square centimeter of upstream filter surface area under conditions similar to those in which the CSPs will be filtered (i.e., pressure, flow rate, and volume filtered). The designated person(s) must ensure—from available published information, from supplier documentation, or through direct challenge (e.g., filtering the CSP)—that the filters 1) are chemically and physically compatible with all ingredients in the CSP (e.g., water-miscible alcohols may damage filter integrity); 2) are chemically stable at the pressure and temperature conditions that will be used; and 3) have enough capacity to filter the required volumes. Filter units used to sterilize CSPs must be subjected to the manufacturers’ recommended integrity testing, such as a post-use bubble point test. If multiple filters are required for the compounding process, each of the filters must pass a filter-integrity test. When CSPs are known to contain excessive particulate matter, a prefiltration step must be performed using a filter of larger nominal pore size (e.g., 1.2 µm) or a separate filter of larger nominal pore size should be placed upstream of (i.e., prior to) the sterilizing filter to remove gross particulate contaminants before the CSP is passed through the sterilizing-grade filter</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D109.	When filters fail integrity testing is the CSP discarded, or if appropriate is the CSP refiltered?	<p>USP <797> 10.2 Sterilization by Filtration CSPs that were prepared using a filter that failed integrity tests must be discarded or, after investigating the cause of the failure and selection of an appropriate filter, refiltered for sterilization not more than one additional time.</p>	Click or tap here to enter text.

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Compliant			#		USP Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D110.	Does the process of steam sterilization meet all requirements?	USP <797> 10.3 Sterilization by Steam Heat To achieve sterility when steam sterilization is used, all materials must be directly exposed to steam under adequate pressure for the length of time necessary, as determined by use of appropriate biological indicators, to render the items sterile (e.g., 20–60 min at 121° saturated steam under a pressure of 15 psi, depending on the volume or size of the CSP being sterilized). The duration of the exposure period must include sufficient time for the entire contents of the CSP and other items to reach the sterilizing temperature. The CSP and other items must remain at the sterilizing temperature for the duration of the sterilization period. CSPs must be placed in the autoclave to allow steam to reach the CSPs without entrapment of air. Flat, stainless-steel trays with low sides or ventilated bottoms will permit steam contact. When preparing items that must be wrapped for steam sterilization, wrap them in low-lint protective fabric or paper or seal in envelopes that will permit steam penetration and are designed to minimize the risk of post-sterilization microbial contamination. For CSPs, immediately before filling containers that will be steam sterilized, solutions must be passed through a filter with a nominal pore size of not larger than 1.2 µm for removal of particulate matter. Sealed containers must be able to generate steam internally. Stoppered and crimped empty vials must contain a small amount of sterile water to generate steam.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D111.	Is the effectiveness of steam sterilization verified and documented with each load using appropriate biological indicators?	USP <797> 10.3 Sterilization by Steam Heat The effectiveness of steam sterilization must be verified and documented with each sterilization run or load by using appropriate biological indicators, such as spores of <i>Geobacillus stearothermophilus</i> (ATCC 12980, ATCC 7953, or equivalent; see <i>Biological Indicators for Sterilization</i> (1229.5)), and other confirmation methods such as physicochemical indicators (see <i>Physicochemical Integrators and Indicators for Sterilization</i> (1229.9)).	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D112.	Does steam heat sterilization follow the required processes and documentation?	USP <797> 10.3 Sterilization by Steam Heat The steam supplied must be generated using water per the manufacturer’s recommendation. A calibrated data recorder or chart must be used to monitor each cycle and to examine for cycle irregularities (e.g., deviations in temperature or pressure). The date, run, and load numbers of the steam sterilizer used to sterilize a CSP must be documented in the CR.	Click or tap here to enter text.

Compliant			#		USP Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D113.	Does the process of dry heat sterilization meet all requirements?	<p>USP <797> 10.4 Sterilization by Dry Heat The CSP and other items must remain at the sterilizing temperature for the duration of the sterilization period. Immediately before filling ampules and vials that will be sterilized by dry heat, CSP solutions must be passed through a filter with a nominal pore size of not larger than 1.2 µm for removal of particulate matter. Dry heat sterilization is usually performed in an oven designed for sterilization at 160° or higher. If lower temperatures are used, they must be shown to achieve effective sterilization (see (1229.8), Validation of Dry Heat Sterilization, Biological Indicators). Heated air must be evenly distributed throughout the chamber, which is typically accomplished by an air blower. The calibrated oven must be equipped with temperature controls and a timer. During sterilization, sufficient space must be left between materials to allow for circulation of the hot air. A calibrated data recorder or chart must be used to monitor each cycle and the data must be reviewed to identify cycle irregularities (e.g., deviations in temperature or exposure time). The effectiveness of the dry heat sterilization method must be verified and documented with each sterilization run or load using appropriate biological indicators such as spores of <i>Bacillus atrophaeus</i> (ATCC 9372; see (1229.5)) and other confirmation methods (e.g., temperature-sensing devices). The date, run, and load numbers of the dry heat oven used to sterilize a CSP must be documented in the CR.</p>	Click or tap here to enter text.
Master Formulation and Compounding Records						
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D114.	Is an MFR created for CSPs prepared from nonsterile ingredients or prepared for more than one patient?	<p>USP <797> 11.1 Creating Master Formulation Records A master formulation record (MFR) is a detailed record of procedures that describes how the CSP is to be prepared. An MFR must be created for all CSPs prepared from nonsterile ingredient(s) or CSPs prepared for more than one patient.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D115.	Are all changes for MFRs approved and documented per facility SOPs?	<p>USP <797> 11.1 Creating Master Formulation Records Any changes or alterations to the MFR must be approved and documented according to the facility's SOPs.</p>	Click or tap here to enter text.

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Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D116.	Do MFRs contain all required elements?	<p>USP <797> 11.1 Creating Master Formulation Records Box 9 Master Formulation Records An MFR must include at least the following information: --Name, strength or activity, and dosage form of the CSP --Identities and amounts of all ingredients; if applicable, relevant characteristics of components (e.g., particle size, salt form, purity grade, solubility) --Type and size of container closure system(s) --Complete instructions for preparing the CSP, including equipment, supplies, a description of the compounding steps, and any special precautions --Physical description of the final CSP --BUD and storage requirements --Reference source to support the stability of the CSP --Quality control (QC) procedures (e.g., pH testing, filter integrity testing) --Other information as needed to describe the compounding process and ensure repeatability (e.g., adjusting pH and tonicity; sterilization method, such as steam, dry heat, irradiation, or filter)</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D117.	Is a CR created for all Category 1, Category 2, and Category 3 CSPs or immediate-use CSPs prepared for more than one patient?	<p>USP <797> 11.2 Creating Compounding Records A CR must be created for all Category 1, Category 2, and Category 3 CSPs. A CR must also be created for immediate-use CSPs prepared for more than one patient.</p>	Click or tap here to enter text.

Compliant			#		USP Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D118.	Do CRs contain all required elements?	<p>USP <797> 11.2 Creating Compounding Records Box 10 Compounding Records CRs must include at least the following information: --Name, strength or activity, and dosage form of the CSP --Date and time of preparation of the CSP --Assigned internal identification number (e.g., prescription, order, or lot number) --A method to identify the individuals involved in the compounding process and individuals verifying the final CSP --Name of each component --Vendor, lot number, and expiration date for each component for CSPs prepared for more than one patient and for CSPs prepared from nonsterile ingredient(s) --Weight or volume of each component --Strength or activity of each component --Total quantity compounded --Final yield (e.g., quantity, containers, number of units) --Assigned BUD and storage requirements --Results of QC procedures (e.g., visual inspection, filter integrity testing, pH testing) If applicable, the CR must also include: --MFR reference for the CSP --Calculations made to determine and verify quantities and/or concentrations of components</p>	Click or tap here to enter text.
Release Inspections and Testing						
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D119.	Are all out-of-specification results investigated with a corrective action implemented and documented as the part of QA and QC program?	<p>USP <797> 12. Release Inspections and Testing Any out-of-specification results must be investigated, and a corrective action plan must be implemented and documented as part of the quality assurance (QA) and QC program (see 18. <i>Quality Assurance and Quality Control</i>).</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D120.	Are visual inspections of CSPs conducted for physical appearance, appropriate labeling, and container closure integrity?	<p>USP <797> 12.1 Visual Inspection At the completion of compounding, before release and dispensing, the CSP must be visually inspected to determine whether the physical appearance of the CSP is as expected (e.g., free of inappropriate visible particulates or other foreign matter, discoloration, or other defects). The CSP label must be visually inspected to confirm that the CSP and its labeling match the prescription or medication order. The inspection also must include a visual inspection of container closure integrity (e.g., checking for leakage, cracks in the container, or improper seals).</p>	Click or tap here to enter text.

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Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D121.	Are CSPs inspected and approved for release or rejected and investigated if found to be of unacceptable quality according to facility SOPs?	<p>USP <797> 12.1 Visual Inspection Any CSP found to be of unacceptable quality (e.g., observed defects) must be promptly rejected, clearly labeled as rejected, and segregated from active stock to prevent use before appropriate disposal.</p> <p>When a CSP will not be released or dispensed on the day of preparation, a visual inspection must be conducted immediately before it is released or dispensed to make sure that the CSP does not exhibit any defects such as precipitation, cloudiness, or leakage, which could develop during storage. Defects that indicate sterility or stability problems must be investigated to determine the cause according to the facility's SOPs (see 18. <i>Quality Assurance and Quality Control</i>).</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D122.	Is sterility testing by approved methods conducted for Category 2 CSPs assigned a BUD that requires sterility testing and all Category 3 CSPs?	<p>USP <797> 12.2 Sterility Testing For Category 2 CSPs assigned a BUD that requires sterility testing (see <i>Table 13</i>) and all Category 3 CSPs, the testing must be performed according to <71> or a validated alternative method (see <1223>) that is noninferior to <71> testing. The maximum batch size for all CSPs requiring sterility testing must be limited to 250 final yield units. If the number of CSPs to be compounded in a single batch is less than the number of CSPs needed for testing as specified in <71>, <i>Table 3</i>, additional units must be compounded to perform sterility testing as follows:</p> <ul style="list-style-type: none"> • If 1–39 CSPs are compounded in a single batch, the sterility testing must be performed on a number of units equal to 10% of the number of CSPs prepared, rounded up to the next whole number. For example: <ul style="list-style-type: none"> ○ If 1 CSP is compounded, 10% of 1 rounded up to the next whole number would indicate that 1 additional CSP must be prepared for sterility testing ○ If 39 CSPs are compounded, 10% of 39 rounded up to the next whole number would indicate that 4 additional CSPs must be prepared for sterility testing • If more than 40 CSPs are prepared in a single batch, the sample sizes specified in <71>, <i>Table 3</i> must be used. <p>If sterility testing is performed according to <71>, the <i>Method Suitability Test</i> from that chapter must be performed to ensure that contamination can be recovered. If an alternative method is used for sterility testing, the method must be validated (see <1223>) and demonstrated to be suitable for that CSP formulation.</p>	Click or tap here to enter text.

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Compliant			#		USP Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D123.	Are sterility test failures investigated and corrective actions documented?	USP <797> 12.2 Sterility Testing Sterility tests resulting in failures must prompt an investigation into the possible causes and must include identification of the microorganism, as well as an evaluation of the sterility testing procedure, compounding facility, process, and/or personnel that may have contributed to the failure. The source(s) of the contamination, if identified, must be corrected, and the facility must determine whether the conditions causing the sterility failure affect other CSPs. The investigation and resulting corrective actions must be documented.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D124.	Is endotoxin testing completed as required?	USP<797> 12.3 Bacterial Endotoxins Testing Category 2 injectable CSPs compounded from one or more nonsterile component(s) and assigned a BUD that requires sterility testing (see Table 13) and Category 3 injectable CSPs compounded from one or more nonsterile component(s) must be tested to ensure that they do not contain excessive bacterial endotoxins (see <85>). Category 2 injectable CSPs compounded from one or more nonsterile component(s) and assigned a BUD that does not require sterility testing should be tested for bacterial endotoxins. In the absence of a bacterial endotoxin limit in an official USP–NF monograph or other CSP formula source, the CSP must not exceed the endotoxin limit calculated as described in <85> for the appropriate route of administration for humans. CSPs for nonhuman species must not exceed the endotoxin limit calculated as described in <85> based on the largest recommended dose and weight (or average weight for more than a single animal) of the target animal species unless a different limit is scientifically supported.	Click or tap here to enter text.
Labeling						
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D125.	Are Category 1, Category 2, and Category 3 CSPs labeled to prevent errors during storage, dispensing, and use?	USP <797> 13. Labeling Category 1, Category 2, and Category 3 CSPs must be labeled with appropriate, legible identifying information to prevent errors during storage, dispensing, and use. The term <i>labeling</i> designates all labels and other written, printed, or graphic matter on the immediate container or on or inside any package or wrapper in which it is enclosed, except any outer shipping container. The term <i>label</i> designates that part of the labeling that is on the immediate container. See <i>Labeling</i> (7).	Click or tap here to enter text.

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Compliant			#		USP Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D126.	Do CSP labels on immediate containers contain all required elements?	<p>USP <797> 13. Labeling The label on each immediate container of the CSP must, at a minimum, display prominently and legibly the following information: --Assigned internal identification number (e.g., barcode, prescription, order, or lot number) --Active ingredient(s) and their amount(s), activity(ies), or concentration(s) --Storage conditions if other than controlled room temperature --BUD --Dosage form --Total amount or volume if it is not obvious from the container --If it is a single-dose container, a statement stating such when space permits --If it is a multiple-dose container, a statement stating such</p> <p>The labeling on the CSP must display the following information, as applicable: --Route(s) of administration --Special handling instructions --Warning statements --Compounding facility name and contact information if the CSP is to be sent outside of the facility or healthcare system in which it was compounded</p>	Click or tap here to enter text.
Establishing Beyond-Use Dates						
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D127.	Are all parameters that may affect quality considered when establishing a BUD?	<p>USP <797> 14.2 Parameters to Consider in Establishing a BUD When establishing a BUD for a CSP, compounders must consider parameters that may affect quality, including but not limited to: --Chemical and physical stability properties of the drug and/or its formulation --Materials of composition of the container closure system and compatibility of the container closure system with the final preparation (e.g., leachables, interactions, adsorption, and storage conditions)</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D128.	Are container closure systems appropriate to withstand frozen storage conditions when applicable?	<p>USP <797> 14.2.4 Storage conditions If the CSP will be stored in a frozen state, the container closure system must be able to withstand the physical stress (i.e., without breaking or cracking) during storage in a freezer.</p>	Click or tap here to enter text.

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Compliant			#		USP Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D129.	Are frozen CSPs thawed and stored under appropriate conditions?	USP <797> 14.2.4 Storage conditions The CSP must be thawed in appropriate conditions to avoid compromising the physical and chemical stability of the preparation and its components (e.g., do not heat in a microwave). Once the CSP is thawed, the CSP must not be refrozen.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D130.	If the storage conditions of a CSP change, is the BUD modified for the new storage conditions?	USP <797> 14.2.4 Storage conditions CSPs may be stored under different storage conditions before they are used (e.g., CSPs may first be frozen, then thawed in the refrigerator, and finally kept at controlled room temperature before administration). The storage time of a CSP must not exceed the original BUD placed on the CSP for its labeled storage condition, and BUDs must not be additive.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D131.	Are assigned BUDs limited to the shortest expiration date or BUD of any component as appropriate?	USP <797> 14.3 Establishing a BUD for a CSP Additionally: --The BUD must not exceed the shortest remaining expiration date of any of the commercially available starting components. --For CSPs prepared from one or more compounded components, the BUD should generally not exceed the shortest BUD of any of the individual compounded components. However, there may be acceptable instances when the BUD of the final CSP exceeds the BUD assigned to compounded components (e.g., pH-altering solutions). If the assigned BUD of the final CSP exceeds the BUD of the compounded components, the physical, chemical, and microbiological quality of the final CSP must not be negatively impacted.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D132.	Are Category 1 CSP BUDs established as required?	USP <797> 14.3 Establishing a BUD for a CSP Table 12. BUD Limits for Category 1 CSPs Storage Conditions: Controlled Room Temperature (20°–25°) -- ≤12 h Refrigerator (2°–8°) -- ≤24 h	Click or tap here to enter text.

Compliant			#		USP Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D133.	Are Category 2 CSP BUDs established as required?	<p>USP <797> 14.3 Establishing a BUD for a CSP Table 13. BUD Limits for Category 2 CSPs Aseptically processed CSPs: -No Sterility Testing Performed/Passed --Prepared from one or more nonsterile starting component(s): Controlled room temperature 1 day; Refrigerator 4 days; Freezer 45 days --Prepared from only sterile starting components: Controlled room temperature 4 days, Refrigerator 10 days, Freezer 45 days -Sterility Testing Performed/Passed --Controlled room temperature 30 days; Refrigerator 45 days; Freezer 60 days Terminally sterilized CSPs: -No Sterility Testing Performed/Passed --Controlled room temperature 14 days; Refrigerator 28 days; Freezer 45 days -Sterility Testing Performed/Passed --Controlled room temperature 45 days; Refrigerator 60 days; Freezer 90 days</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D134.	Are assigned BUDs for Category 3 CSPs supported by stability data using a stability indicating method?	<p>USP <797> 14.4.3 Stability Requirements for Category 3 CSPs The BUD assigned to a Category 3 CSP must be supported by stability data obtained using a stability-indicating analytical method that is able to distinguish the active ingredient from its degradants and impurities (e.g., by forced degradation studies) and quantify the amount of the active ingredient.</p> <ul style="list-style-type: none"> • The Category 3 CSP must be prepared according to the exact formulation (API and other ingredients of identical grade and procedures) from which the stability data are derived. • The Category 3 CSP must be packaged and stored in a container closure of the same materials of composition as that used in the study. • The analytical method must be validated based on characteristics such as those described in <1225>. • The compounding facility must have documentation of the stability study, including a description of the methodology (e.g., number of samples taken, storage conditions), validation of the method, the stability-indicating analytical method, and all of the results of the study. 	Click or tap here to enter text.

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Compliant			#		USP Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D135.	Are Category 3 CSP BUDs established as required?	<p>USP <797> 14.4.4 Establishing a BUD for a CSP Table 14. BUD Limits for Category 3 CSPs -Aseptically processed, sterility tested, and passing all applicable tests for Category 3 CSPs: CRT 60 days; Refrigerator 90 days; Freezer 120 days -Terminally sterilized, sterility tested, and passing all applicable tests for Category 3 CSPs: CRT 90 days; Refrigerator 120 days; Freezer 180 days</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D136.	Do multiple-dose CSPs pass antimicrobial effectiveness testing as required?	<p>USP <797> 14.5 Multiple-Dose CSPs The use of preservatives must be appropriate for the CSP formulation and the route of administration. A multiple-dose CSP must be prepared as a Category 2 or Category 3 CSP. An aqueous multiple-dose CSP must additionally pass antimicrobial effectiveness testing in accordance with <i>Antimicrobial Effectiveness Testing</i> (51). Antimicrobial effectiveness testing may be performed on a low concentration and a high concentration of the active ingredient in the formulation to establish preservative effectiveness across various strengths of the same formulation (e.g., bracketing). The concentration of all other ingredients (including preservatives) must be the same throughout the bracketing study.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D137.	Is the BUD of a punctured multiple-dose CSP limited to the shorter of the assigned BUD or 28 days if supported by antimicrobial testing results?	<p>USP <797> 14.5 Multiple-Dose CSPs After a multiple-dose CSP container is initially entered or punctured, the multiple-dose container must not be used for longer than the assigned BUD or 28 days if supported by antimicrobial effectiveness testing results (see (51)) on the CSP, whichever is shorter.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D138.	Do container closure systems for multiple-dose CSPs conform to container closure integrity?	<p>USP <797> 14.5 Multiple-Dose CSPs The container closure system used to package the multiple-dose CSP must be evaluated for and conform to container closure integrity (see (1207)).</p>	Click or tap here to enter text.

Compliant			#	USP Reference	Notes/Corrective Actions
Yes	No	N/A			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D139.	<p>USP <797> 14.5 Multiple-Dose CSPs Multiple-dose, nonpreserved, aqueous topical, and topical ophthalmic, CSPs The beyond-use date of a multiple-dose, aqueous, nonpreserved CSP intended for topical, including topical ophthalmic, administration may be assigned in accordance with 14.5 Multiple-Dose CSPs. However, unpreserved aqueous, topical, including topical ophthalmic, formulations, are at high risk of microbial proliferation if contaminated during preparation or use. To minimize the risk of patient harm, the requirement for passing antimicrobial effectiveness testing in accordance with <51> is not required only if the preparation is:</p> <ul style="list-style-type: none"> -Prepared as a Category 2 or Category 3 CSP -For use by a single patient -Labeled (in the label or labeling) to indicate that once opened, it must be discarded after 24 h when stored at controlled room temperature and/or that once opened, it must be discarded after 72 hours when stored under refrigeration. 	Click or tap here to enter text.
Use of Conventionally Manufactured Products as Components					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D140.	<p>USP <797> 15.1 Use of Conventionally Manufactured Single-Dose Containers If a single-dose vial is entered or punctured only in an ISO Class 5 or cleaner air, it may be used up to 12 h after initial entry or puncture as long as the labeled storage requirements during that 12-h period are maintained. Opened single-dose ampules must not be stored for any time period.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D141.	<p>USP <797> 15.2 Use of Conventionally Manufactured Multiple-Dose Containers Once initially entering or puncturing the multiple-dose container, the multiple-dose container must not be used for more than 28 days (see <51>) unless otherwise specified by the manufacturer on the labeling.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D142.	<p>USP <797> 15.3 Use of Conventionally Manufactured Pharmacy Bulk Packages The pharmacy bulk package must be used according to the manufacturer’s labeling (see <659>, <i>General Definitions, Injection Packaging Systems</i>). The pharmacy bulk package must be entered or punctured only in an ISO Class 5 PEC.</p>	Click or tap here to enter text.

Compliant			#	USP Reference	Notes/Corrective Actions
Yes	No	N/A			
Use of CSPs as Components					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D143.	<p>USP <797> 16.1 Use of Compounded Multiple-Dose CSPs Multiple-dose CSPs must be stored under the conditions upon which its BUD is based (e.g., refrigerator or controlled room temperature). After a multiple-dose CSP is initially entered or punctured, the multiple-dose CSP must not be used for longer than the assigned BUD or 28 days, whichever is shorter. This time limit for entering or puncturing is not intended to restrict the BUD of the final CSP.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D144.	<p>USP <797> 16.2 Use of Compounded Single-Dose CSPs and CSP Stock Solutions When a compounded single-dose CSP or CSP stock solution is used as a component to compound additional CSPs, the original compounded single-dose CSP or CSP stock solution must be entered or punctured in ISO Class 5 or cleaner air and must be stored under the conditions upon which its BUD is based (e.g., refrigerator or controlled room temperature). The component CSP may be used for sterile compounding for up to 12 h or its assigned BUD, whichever is shorter, and any remainder must be discarded. This time limit for entering or puncturing is not intended to restrict the BUD of the final CSP.</p>	Click or tap here to enter text.
Standard Operating Procedures					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D145.	<p>USP <797> 17. SOPs Facilities that prepare CSPs must develop SOPs for the compounding process and other support activities. SOPs must include the types of CSPs that are prepared (i.e., Category 1, Category 2, Category 3). A designated person(s) must ensure that SOPs are appropriate and are implemented, which includes ensuring that personnel demonstrate competency in performing every procedure that relates to their job function. A designated person(s) must follow up to ensure that corrective actions are taken if problems, deviations, failures, or errors are identified. The corrective action must be documented.</p>	Click or tap here to enter text.

Compliant			#		USP Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D146.	Are all personnel who perform or oversee compounding or support activities trained in the SOPs?	<p>USP <797> 17. SOPs All personnel who perform or oversee compounding or support activities must be trained in the SOPs. All compounding personnel must be trained to:</p> <ul style="list-style-type: none"> --Recognize potential problems, deviations, failures, or errors associated with preparing a CSP (e.g., those related to equipment, facilities, materials, personnel, the compounding process, or testing) that could potentially result in contamination or other adverse impact on CSP quality --Report any problems, deviations, failures, or errors to the designated person(s). 	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D147.	Are SOPs reviewed and updated at appropriate intervals by the designated person(s)?	<p>USP <797> 17. SOPs SOPs must be reviewed initially and at least every 12 months by the designated person(s) to ensure that they reflect current practices, and the review must be documented. Any changes or alterations to an SOP must be made only by a designated person(s) and must be documented. Revisions to SOPs must be communicated to all personnel involved in these processes and procedures, and personnel should document acknowledgment of the communication.</p>	Click or tap here to enter text.
Quality Assurance and Quality Control						
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D148.	Does the facility have established and documented QA and QC programs which are detailed in the facility SOPs?	<p>USP <797> 18. Quality Assurance and Quality Control A facility's QA and QC programs must be formally established and documented in the facility's SOPs that ensure that all aspects of the preparation of CSPs are conducted in accordance with the requirements in this chapter (<797>) and the laws and regulations of the applicable regulatory jurisdiction. Designated person(s) must ensure that the facility has formal, written QA and QC programs that establish a system of:</p> <ol style="list-style-type: none"> 1. Adherence to procedures 2. Prevention and detection of errors and other quality problems 3. Evaluation of complaints and adverse events 4. Appropriate investigations and corrective actions 	Click or tap here to enter text.

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Compliant			#		USP Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D149.	Does the facility have notification and recall procedures in place for CSPs released prior to known testing results?	USP <797> 18.1 Notification About and Recall of Out-of-Specification Dispensed CSPs If a CSP is dispensed or administered before the results of release testing are known, the facility must have procedures in place to: --Immediately notify the prescriber of a failure of specifications with the potential to cause patient harm (e.g., sterility, strength, purity, bacterial endotoxin, or other quality attributes) --Recall any unused dispensed CSPs and quarantine any stock remaining in the pharmacy --Investigate if other lots are affected and recall if necessary.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D150.	Does the facility have SOPs for recalling out-of-specification dispensed CSPs?	USP <797> 18.1 Notification About and Recall of Out-of-Specification Dispensed CSPs An SOP for recall of out-of-specification dispensed CSPs must contain: --Procedures to determine the severity of the problem and the urgency for implementation and completion of the recall --Procedures to determine the distribution of any affected CSP, including the date and quantity of distribution --Procedures to identify patients who have received the CSP --Procedures for disposal and documentation of the recalled CSP --Procedures to investigate and document the reason for failure	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D151.	Does the facility document and report recalls as required?	USP <797> 18.1 Notification About and Recall of Out-of-Specification Dispensed CSPs The sterile compounding facility must document the implementation of the recall procedures. The recall must be reported to appropriate regulatory bodies as required by laws and regulations of the applicable regulatory jurisdiction.	Click or tap here to enter text.

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Compliant			#		USP Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D152.	Does the facility have SOPs, and a review and investigation process for handling complaints?	<p>USP <797> 18.2 Complaint Handling Compounding facilities must develop and implement SOPs for handling complaints. Complaints may include but are not limited to concerns or reports on the quality, labeling, or possible adverse reactions related to a specific CSP. A designated person(s) must review all complaints to determine whether the complaint indicates a potential quality problem with the CSP. If it does, a thorough investigation into the cause of the problem must be initiated and completed. The investigation must consider whether the quality problem extends to other CSPs. Corrective action, if necessary, must be implemented for all potentially affected CSPs. A readily retrievable written or electronic record of each complaint must be kept by the facility, regardless of the source of the complaint (e.g., email, telephone, or mail). The record must contain the name of the complainant or other unique identifier, the date the complaint was received, the nature of the complaint, and the response to the complaint. In addition, to the extent that the information is known, the following should be recorded: the name and strength of the CSP and the assigned internal identification number (e.g., prescription, order, or lot number). The record must also include the findings of any investigation and any follow-up. Records of complaints must be easily retrievable for review and evaluation for possible trends and must be retained in accordance with the record-keeping requirements in 20. <i>Documentation</i>. A CSP that is returned in connection with a complaint must be quarantined until it is destroyed after completion of the investigation and in accordance with laws and regulations of the applicable regulatory jurisdiction.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D153.	Are adverse events potentially associated with the quality of CSPs reported in accordance with the facility's SOPs?	<p>USP <797> 18.3 Adverse Event Reporting Adverse events potentially associated with the quality of CSPs must be reported in accordance with the facility's SOPs and all laws and regulations of the applicable regulatory jurisdiction. If the investigation into an adverse event reveals a quality problem with a CSP that is likely to affect other patients, those patients and prescribers potentially affected must be informed.</p>	Click or tap here to enter text.

Compliant			#	USP Reference	Notes/Corrective Actions
Yes	No	N/A			
CSP Handling, Storage, Packing, Shipping, and Transport					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D154.	<p>Are personnel trained in processes and techniques for handling storing, packaging, and transporting CSPs as outlined in the facility SOPs?</p> <p>USP <797> 19. CSP HANDLING, STORAGE, PACKAGING, SHIPPING, AND TRANSPORT Processes and techniques for handling, storing, packaging, and transporting CSPs must be outlined in the facility's SOPs. Personnel who will be handling, storing, packaging, and transporting CSPs within the facility must be trained in accordance with the relevant SOPs, and the training must be documented.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D155.	<p>Are temperatures of drug storage areas monitored and documented as required?</p> <p>USP <797> 19.1 Handling and Storing CSPs To help ensure that CSP quality is maintained during storage at the compounding facility, personnel must monitor conditions in the storage areas. A controlled temperature area (see (659)) must be established and monitored to ensure that the temperature remains within the appropriate range for the CSP. The temperature must be monitored each day, either manually or by a continuous recording device. The results of the temperature readings must be documented in a temperature log per facility SOPs or stored in the continuous temperature recording device and must be retrievable. Temperature monitoring devices must be verified for accuracy at least every 12 months or as required by the manufacturer.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D156.	<p>Does the facility detect and minimize temperature excursions and evaluate exposed CSPs for product integrity?</p> <p>USP <797> 19.1 Handling and Storing CSPs The compounding facility must detect and minimize temperature excursions that are outside the temperature limits within the controlled temperature areas. When it is known that a CSP has been exposed to temperatures either below or above the storage temperature limits for the CSP, a designated person(s) must determine (e.g., by consulting literature or analytical testing) whether the CSP is expected to retain its integrity or quality. If this cannot be determined, it must be discarded.</p>	Click or tap here to enter text.

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Compliant			#		USP Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D157.	Does the facility select appropriate shipping containers and packaging materials based on product specifications, information from vendors, and mode of transport?	USP <797> 19.2 Packaging of CSPs The facility must select appropriate shipping containers and packaging materials based on the product specifications, information from vendors, and the mode of transport. Alternative modes of transport and/or special packaging (e.g., tamper-evident closures) may be needed to protect the quality of CSPs. If the CSP is sensitive to light, light-resistant packaging materials must be used. In some cases, the CSP must be packaged in a special container (e.g., a cooler) to protect it from temperature fluctuations.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D158.	Do personnel select modes of transport and note specific handling instructions on the exterior container?	USP <797> 19.3 Shipping and Transporting CSPs Compounding personnel must select modes of transport that are expected to deliver properly packed CSPs in an undamaged, sterile, and stable condition. When shipping or transporting CSPs that require special handling (e.g., CSPs with stability concerns), personnel must include specific handling instructions on the exterior of the container.	Click or tap here to enter text.
Documentation						
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D159.	Does the facility maintain all required documentation?	USP <797> 20. Documentation All facilities where CSPs are prepared must have and maintain written or electronic documentation to demonstrate compliance with the requirements in this chapter. This documentation must include, but is not limited to, the following: --Personnel training, competency assessments, and qualification records including corrective actions for any failures --Certification reports, including corrective actions for any failures --Environmental air and surface monitoring procedures and results --Equipment records (e.g., calibration, verification, and maintenance reports) --Receipt of components --SOPs, MFRs (if required), and CRs (if required) --Release inspection and testing records --Information related to complaints and adverse events including corrective actions taken --Results of investigations and corrective actions	Click or tap here to enter text.

Compliant			#	USP Reference	Notes/Corrective Actions
Yes	No	N/A			
Compounding Allergenic Extracts					
If the facility compounds allergenic extracts, please complete the Compounding Allergenic Extracts section of the worksheet. If the facility does not engage in these activities, please skip this section.					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D160.	<p>USP <797> 21.1 Personnel Qualifications for Compounding Allergenic Extract Prescription Sets Allergenic extract prescription sets must follow standards at least as stringent as those in this section as follows: --A designated person(s) with training and expertise in allergen immunotherapy is responsible for ensuring that personnel who will be preparing allergenic extract prescription sets are trained, evaluated, and supervised. --Before beginning to independently prepare allergenic extracts, all compounding personnel must complete training and be able to demonstrate knowledge of principles and skills for sterile compounding. --Annual personnel training and competency must be documented. Personnel must demonstrate knowledge and competency in these procedures by passing written or electronic testing before they can be allowed to compound allergenic extract prescription sets. --Before being allowed to independently compound, all compounders must successfully complete gloved fingertip and thumb sampling on both hands (see <i>Box 1</i> and <i>Table 1</i>) no fewer than 3 separate times. Each fingertip and thumb evaluation must occur after performing separate and complete hand hygiene and garbing procedures. After the initial competency evaluation, compounding personnel must successfully complete gloved fingertip and thumb sampling on both hands at least every 12 months thereafter. --Compounding personnel must have their sterile technique and related practices evaluated at least every 12 months as demonstrated by successful completion of a media-fill test (see <i>Box 2</i>). If compounding outside of a PEC, the post-media-fill surface sample is not required. --Personnel who fail competency evaluations must successfully pass reevaluations in the deficient area(s) before they can resume compounding of allergenic extract prescription sets. The designated person(s) must identify the cause of failure and determine appropriate retraining requirements. --Personnel who have not compounded an allergenic extract prescription set in more than 6 months must be evaluated in all core competencies before resuming compounding duties.</p>	Click or tap here to enter text.

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Compliant			#		USP Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D161.	Do personnel compounding allergenic extracts perform hand hygiene and garbing procedures per facility SOPs ?	<p>USP <797> 21.2 Personnel Hygiene and Garbing for Compounding Allergenic Extract Prescription Sets Before beginning compounding of allergenic extract prescription sets, personnel must perform hand hygiene (see <i>Box 3</i>) and garbing procedures according to the facility's SOPs. The minimum garb requirements include: --A low-lint garment with sleeves that fit snugly around the wrists and an enclosed neck (e.g., gowns) --A low-lint, disposable head cover that covers the hair and ears and, if applicable, a disposable cover for facial hair --Face mask --Sterile powder-free gloves Throughout the compounding process, personnel must apply sterile 70% IPA onto all surfaces of the gloves and allow them to dry thoroughly.</p>	Click or tap here to enter text.

DRAFT

Compliant			#	USP Reference	Notes/Corrective Actions
Yes	No	N/A			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D162.	<p>USP <797> 21.3 Facilities for Compounding Allergenic Extract Prescription Sets</p> <ul style="list-style-type: none"> • The compounding process must occur in an ISO Class 5 PEC or in a dedicated allergenic extract compounding area (AECA). The PEC or AECA used to compound allergenic extract prescription sets must be located away from unsealed windows, doors that connect to the outdoors, and traffic flow, all of which may adversely affect the air quality. Neither a PEC nor an AECA may be located where environmental control challenges (e.g., restrooms, warehouses, or food preparation areas) could negatively affect the air quality. The PEC or the work surfaces in the AECA must be located at least 1 m away from a sink. The impact of activities that will be conducted around or adjacent to the PEC or AECA must be considered carefully when designing such an area. • If used, the PEC must be certified at least every 6 months (see <i>5. Certification and Recertification</i>). • If used, a visible perimeter must define the AECA. <p>--Access to the AECA during compounding must be restricted to authorized personnel. --During compounding activities, no other activity is permitted in the AECA. --The surfaces of walls, floors, fixtures, shelving, counters, and cabinets in the AECA must be cleanable. --Carpet is not allowed in the AECA. --Surfaces should be resistant to damage by cleaning and disinfecting agents. --The surfaces in the AECA upon which the allergenic extract prescription sets are prepared must be smooth, impervious, free from cracks and crevices, and non-shedding to allow for easy cleaning and disinfecting. --Dust-collecting overhangs such as utility pipes, ledges, and windowsills should be minimized. If overhangs or ledges are present, they must be easily cleanable. --The AECA must be designed and controlled to provide a well-lighted working environment, with temperature and humidity controls for the comfort of compounding personnel wearing the required garb.</p>	Click or tap here to enter text.

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Compliant			#		USP Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D163.	Are all interior surfaces of the PEC and the required surfaces in the AECA cleaned and disinfected as specified?	<p>USP <797> 21.4 Cleaning and Disinfecting for Compounding Allergenic Extract Prescription Sets</p> <ul style="list-style-type: none"> • In a PEC, all interior surfaces of the PEC must be cleaned and disinfected each day of use before compounding begins and when surface contamination is known or suspected. Apply sterile 70% IPA to the horizontal work surface between each prescription set. • In an AECA, all work surfaces in the AECA where direct compounding is occurring must be cleaned and disinfected each day of use before compounding begins and when surface contamination is known or suspected. Apply sterile 70% IPA to the horizontal work surface between each prescription set. <p>-If present, walls, doors, and door frames within the perimeter of the AECA must be cleaned and disinfected monthly and when surface contamination is known or suspected.</p> <p>-Ceilings within the perimeter of the AECA must be cleaned and disinfected when visibly soiled and when surface contamination is known or suspected.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D164.	Are vial stoppers of packages of conventionally manufactured sterile ingredients wiped with sIPA 70% and allowed to dry before use?	<p>USP <797> 21.4 Cleaning and Disinfecting for Compounding Allergenic Extract Prescription Sets</p> <p>Vial stoppers on packages of conventionally manufactured sterile ingredients must be wiped with sterile 70% IPA to ensure that the critical sites are wet and allowed to dry before they are used to compound allergenic extract prescription sets.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D165.	Are BUDs appropriately established for allergenic extract prescription sets?	<p>USP <797> 21.5 Establishing BUDs for Allergenic Extract Prescription Sets</p> <p>The BUD for the prescription set must be no later than the earliest expiration date of any allergenic extract or any diluent that is part of the prescription set, and the BUD must not exceed 1 year from the date the prescription set is mixed or diluted.</p>	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D166.	Does the label for an allergenic extract prescription set include all required elements?	<p>USP <797> 21.6 Labeling for Allergenic Extract Prescription Sets</p> <p>The label of each vial of an allergenic extract prescription set must display the following prominently and understandably:</p> <ul style="list-style-type: none"> --Patient name --Type and fractional dilution of each vial, with a corresponding vial number --BUD --Storage conditions 	Click or tap here to enter text.

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Compliant			#		USP Reference	Notes/Corrective Actions
Yes	No	N/A				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D167.	Do shipping and transport labels for allergenic extract prescription sets include specific handling instructions on the exterior of the container?	USP <797> 21.7 Shipping and Transporting Allergenic Extract Prescription Sets When shipping or transporting allergenic extract prescription sets that require special handling, personnel must include specific handling instructions on the exterior of the container.	Click or tap here to enter text.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D168.	Does the facility maintain all required documentation?	USP <797> 21.8 Documentation for Compounding Allergenic Extract Prescription Sets All facilities where allergenic extract prescription sets are prepared must have and maintain written or electronic documentation to include, but not limited to, the following: --SOPs describing all aspects of the compounding process --Personnel training records, competency assessments, and qualification records including corrective actions for any failures --Certification reports of the PEC, if used, including corrective actions for any failures --Temperature logs for refrigerator(s) --CRs for individual allergenic extract prescription sets (see <i>Box 10</i>) --Information related to complaints and adverse events including corrective actions taken --Investigations and corrective actions	Click or tap here to enter text.

Standard Operating Procedure Locations

Please provide the physical location of the document in the pharmacy, or file pathway if policies are maintained in electronic format. Please be as specific as possible, there can be many file cabinets and binders. Checkboxes are not required beyond this point.

D169.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 1.1.2 Specific Practices When compounding activities require the manipulation of a patient's blood-derived or other biological material (e.g., autologous serum), the manipulations must be clearly separated from other compounding activities and equipment used in CSP preparation activities, and they must be controlled by specific standard operating procedures (SOPs) to avoid any cross-contamination.	Click or tap here to enter text.
D170.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 1.3 Immediate-Use CSPs Aseptic techniques, processes, and procedures are followed, and written SOPs are in place to minimize the potential for contact with nonsterile surfaces, introduction of particulate matter or biological fluids, and mix-ups with other conventionally manufactured products or CSPs.	Click or tap here to enter text.

Standard Operating Procedure Locations

D171.	<p>Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.</p>	<p>USP <797> 1.3 Immediate-Use CSPs Personnel are trained and demonstrate competency in aseptic processes as they relate to assigned tasks and the facility's SOPs.</p>	Click or tap here to enter text.
D172.	<p>Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.</p>	<p>USP <797> 2. Personnel Training and Evaluation Personnel who only perform restocking or cleaning and disinfecting duties outside of the primary engineering control (PEC) must complete ongoing training as required by the facility's SOPs.</p>	Click or tap here to enter text.
D173.	<p>Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.</p>	<p>USP <797> 2. Personnel Training and Evaluation Personnel compounding only immediate-use CSPs must complete training as required by the facility's SOPs.</p>	Click or tap here to enter text.
D174.	<p>Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.</p>	<p>USP <797> 2. Personnel Training and Evaluation Each compounding facility must develop a written training program that describes the required training, the frequency of training, and the process for evaluating the performance of individuals who compound, have direct oversight of compounding personnel, perform in-process checks, final verification, and dispensing of CSPs. This program must equip personnel with the appropriate knowledge and train them in the required skills necessary to perform their assigned tasks, and SOPs should specify the training required for such tasks.</p>	Click or tap here to enter text.
D175.	<p>Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.</p>	<p>USP <797> 2.3 Competency Testing in Aseptic Manipulation Box 2. Media-Fill Testing Procedures Incubate the final containers at 20°–25° and 30°–35° for a minimum of 7 days at each temperature band to detect a broad spectrum of microorganisms. The order of the incubation temperatures must be described in the facility's SOPs.</p>	Click or tap here to enter text.
D176.	<p>Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.</p>	<p>USP <797> 2.3 Competency Testing in Aseptic Manipulation Initial and Ongoing Training and Competency Tables Training and competency must be defined by facility SOPs for the personnel who do not compound nor have direct oversight of compounding personnel.</p>	Click or tap here to enter text.
D177.	<p>Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.</p>	<p>USP <797> 2.3 Competency Testing in Aseptic Manipulation Initial and Ongoing Training and Competency Tables Training and competency should supplement facility SOPs for the designated person(s), personnel who compound, and personnel with direct oversight of compounding personnel.</p>	Click or tap here to enter text.

Standard Operating Procedure Locations

D178.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 3. Personal Hygiene and Garbing The order of garbing must be determined by the facility and documented in the facility's SOPs.	Click or tap here to enter text.
D179.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 3.3 Garbing Requirements The required garb, manner of storage, and order of garbing must be determined by the facility and documented in the facility's SOPs.	Click or tap here to enter text.
D180.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 3.3 Garbing Requirements Category 1 and 2: The facility's SOPs must describe disinfection procedures for reusing goggles, respirators, and other reusable equipment.	Click or tap here to enter text.
D181.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 3.3 Garbing Requirements Category 3: The facility's SOPs must describe disinfection procedures for reusing goggles, respirators, and other reusable equipment.	Click or tap here to enter text.
D182.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 3.3 Garbing Requirements The RABS sleeves and gloves and the pharmaceutical isolator sleeves and gloves should be changed per the manufacturer's recommendations and as defined in the facility's SOPs.	Click or tap here to enter text.
D183.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 4.2 Facility Design and Environmental Controls The temperature and humidity readings must be reviewed as described in the facility's SOPs.	Click or tap here to enter text.
D184.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 4.5 Placement and Movement of Materials. The designated person(s) is responsible for addressing other areas of risk in the facility's SOPs.	Click or tap here to enter text.
D185.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 5.1 Total Airborne Particle Sampling All sampling sites and procedures must be described in the facility's SOPs.	Click or tap here to enter text.

Standard Operating Procedure Locations

D186.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 6.1 General Monitoring Requirements The microbiological air and surface monitoring program must be clearly described in the facility's SOPs, which must include a diagram of the sampling locations, procedures for collecting samples, frequency of sampling, size of samples (e.g., surface area, volume of air), time of day of sampling in relation to activities in the compounding area, and action levels that will trigger corrective action.	Click or tap here to enter text.
D187.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 6.2.2 Viable Air Sampling Procedures The incubator temperature must be monitored during incubation, either manually or by a continuous recording device, and the results must be reviewed and documented as described in the facility's SOPs.	Click or tap here to enter text.
D188.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 6.3 Monitoring Surfaces for Viable Particles All sampling sites and procedures must be described in the facility's SOPs.	Click or tap here to enter text.
D189.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 7. Cleaning, Disinfecting, and Applying Sporicidal Disinfectants and Sterile 70% IPA All cleaning and disinfecting activities must be performed by trained and appropriately garbed personnel using facility-approved agents and procedures, which must be described in written SOPs.	Click or tap here to enter text.
D190.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 7. Cleaning, Disinfecting, and Applying Sporicidal Disinfectants and Sterile 70% IPA The frequency, method(s), and location(s) of cleaning, disinfecting, and applying sporicidal disinfectants must be established in written SOPs, in accordance with the manufacturer's instructions and must be followed by all cleaning personnel.	Click or tap here to enter text.
D191.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 7. Cleaning, Disinfecting, and Applying Sporicidal Disinfectants and Sterile 70% IPA All cleaning, disinfecting, and application of sporicidal disinfectants must be documented according to the facility's SOPs.	Click or tap here to enter text.
D192.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 7.1.2 Supplies Once opened, sterile cleaning and disinfecting agents and supplies (e.g., closed containers of sterile wipers) and sterile 70% IPA may be reused for a time period specified as by the manufacturer and/or described in the facility written SOPs.	Click or tap here to enter text.

Standard Operating Procedure Locations

D193.	<p>Title or SOP number: Click or tap here to enter text.</p> <p>Location or file pathway: Click or tap here to enter text.</p>	<p>USP <797> 9.1 Equipment Compounding personnel must follow established SOPs for the calibration, maintenance, cleaning, and use of the equipment based on the manufacturer's recommendations.</p>	Click or tap here to enter text.
D194.	<p>Title or SOP number: Click or tap here to enter text.</p> <p>Location or file pathway: Click or tap here to enter text.</p>	<p>USP <797> 9.1 Equipment Weighing, measuring, or otherwise manipulating components that could generate airborne chemical particles (e.g., active pharmaceutical ingredients [APIs], added substances, conventionally manufactured products) must be evaluated to determine if these activities must be performed in a PEC or other closed system processing device (e.g., single use containment glove bag) to reduce the potential exposure to personnel or contamination of the facility or CSPs (See 4.2.6 Facilities preparing Category 2 or Category 3 CSPs from nonsterile starting component(s)). The process evaluation must be carried out in accordance with the facility's SOPs and the assessment must be documented.</p>	Click or tap here to enter text.
D195.	<p>Title or SOP number: Click or tap here to enter text.</p> <p>Location or file pathway: Click or tap here to enter text.</p>	<p>USP <797> 9.3 Components Compounding personnel must follow the facility's SOPs, which must address the selection, receipt, evaluation, handling, storage, and documentation of all CSP components, including all ingredients and container closures.</p>	Click or tap here to enter text.
D196.	<p>Title or SOP number: Click or tap here to enter text.</p> <p>Location or file pathway: Click or tap here to enter text.</p>	<p>USP <797> 10. Sterilization and Depyrogenation A description of the terminal sterilization and depyrogenation process, including the temperature, pressure (if applicable), duration, permissible load conditions for each cycle, and the use of biological indicators and endotoxin challenge vials (ECVs) must be included in the facility's SOPs.</p>	Click or tap here to enter text.
D197.	<p>Title or SOP number: Click or tap here to enter text.</p> <p>Location or file pathway: Click or tap here to enter text.</p>	<p>USP <797> 10. Sterilization and Depyrogenation SOPs must include training and competency of personnel on all sterilization methods and equipment used by the facility.</p>	Click or tap here to enter text.
D198.	<p>Title or SOP number: Click or tap here to enter text.</p> <p>Location or file pathway: Click or tap here to enter text.</p>	<p>USP <797> 10. Sterilization and Depyrogenation The SOPs must include a schedule and method for establishing and verifying the effectiveness of the terminal sterilization and depyrogenation methods selected, as well as the methods for maintaining and cleaning the sterilizing and depyrogenation equipment.</p>	Click or tap here to enter text.

Standard Operating Procedure Locations

D199.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 10.1 Depyrogenation The effectiveness of the depyrogenation cycle must be re-established if there are changes to the depyrogenation cycle described in SOPs (e.g., changes in load conditions, duration, or temperature).	Click or tap here to enter text.
D200.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 11.1 Creating Master Formulation Records Any changes or alterations to the MFR must be approved and documented according to the facility's SOPs.	Click or tap here to enter text.
D201.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 12. Release Inspections and Testing All release testing procedures (e.g., visual inspections and testing) must be included in the facility's documentation (see 11. Master Formulation and Compounding Records and 17. SOPs).	Click or tap here to enter text.
D202.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 12.1 Visual Inspection Defects that indicate sterility or stability problems must be investigated to determine the cause according to the facility's SOPs (see 18. Quality Assurance and Quality Control).	Click or tap here to enter text.
D203.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 13. Labeling Labeling procedures must be followed as described in the facility's SOPs to prevent labeling errors and CSP mix-ups.	Click or tap here to enter text.
D204.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 17. SOPs Facilities that prepare CSPs must develop SOPs for the compounding process and other support activities.	Click or tap here to enter text.
D205.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 17. SOPs SOPs must include the types of CSPs that are prepared (i.e., Category 1, Category 2, Category 3).	Click or tap here to enter text.
D206.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 18. Quality Assurance and Quality Control A facility's QA and QC programs must be formally established and documented in the facility's SOPs that ensure that all aspects of the preparation of CSPs are conducted in accordance with the requirements in this chapter (<797>) and the laws and regulations of the applicable regulatory jurisdiction.	Click or tap here to enter text.

Standard Operating Procedure Locations

D207.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 18. Quality Assurance and Quality Control The facility's SOPs must describe the roles, duties, and training of the personnel responsible for each aspect of the QA program.	Click or tap here to enter text.
D208.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 18.1 Notification About and Recall of Out-of-Specification Dispensed CSPs An SOP for recall of out-of-specification dispensed CSPs must contain: <ul style="list-style-type: none"> • Procedures to determine the severity of the problem and the urgency for implementation and completion of the recall • Procedures to determine the distribution of any affected CSP, including the date and quantity of distribution • Procedures to identify patients who have received the CSP • Procedures for disposal and documentation of the recalled CSP • Procedures to investigate and document the reason for failure 	Click or tap here to enter text.
D209.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 18.2 Complaint Handling Compounding facilities must develop and implement SOPs for handling complaints.	Click or tap here to enter text.
D210.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 18.3 Adverse Event Reporting Adverse events potentially associated with the quality of CSPs must be reported in accordance with the facility's SOPs and all laws and regulations of the applicable regulatory jurisdiction.	Click or tap here to enter text.
D211.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 19. CSP HANDLING, STORAGE, PACKAGING, SHIPPING, AND TRANSPORT Processes and techniques for handling, storing, packaging, and transporting CSPs must be outlined in the facility's SOPs.	Click or tap here to enter text.
D212.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 19. CSP HANDLING, STORAGE, PACKAGING, SHIPPING, AND TRANSPORT Personnel who will be handling, storing, packaging, and transporting CSPs within the facility must be trained in accordance with the relevant SOPs, and the training must be documented.	Click or tap here to enter text.
D213.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 19.1 Handling and Storing CSPs The results of the temperature readings must be documented in a temperature log per facility SOPs or stored in the continuous temperature recording device and must be retrievable.	Click or tap here to enter text.
D214.	Title or SOP number: Click or tap here to enter text. Location or file pathway: Click or tap here to enter text.	USP <797> 21.2 Personnel Hygiene and Garbing for Compounding Allergenic Extract Prescription Sets Before beginning compounding of allergenic extract prescription sets, personnel must perform hand hygiene (see Box 3) and garbing procedures according to the facility's SOPs.	Click or tap here to enter text.

PQAC Rules Tracker

Title	Status	Short Description	Most Recent WSR #
NARCAN OTC status (emergency)	Emergency rule will sunset; policy statement will replace	Emergency rules for accessing Narcan and similar formularies upon manufacturer availability	Not yet filed
Medication assistance (emergency - filed jointly with DOH)	Under division review	Medication assistance emergency rules in accordance with chapter 69.41 RCW	WSR 23-15-017 (Filed July 7, 2023)
Accessible labeling (visual/print access and translated labels)	Draft Significant Analysis form (and SBEIS if necessary)	Standard/significant rules for establishing standards for prescription drug information access and comprehension	WSR 22-09-065 (Filed June 12, 2023)
Medication assistance (standard - will file jointly with DOH)	Draft language under interagency discussion	Medication assistance rules in accordance with chapter 69.41 RCW	WSR 22-02-015 (Filed December 27, 2021)
Remote dispensing OUD medications - SSB 6086 (standard)	Public comment period for 10/19 public hearing	SSB 6086 - Implementing remote dispensing of OUD medications	WSR 23-16-071 (Filed July 27, 2023)
Rescind Continuing Education rules	CR-103p under internal review prior to division review	Rescind Continuing Education rules	WSR 23-05-010 (Filed February 2, 2023)
Wildlife Capture Drugs	CR-101 under division review	Amending chapter 246-945 WAC to add certain intramammary antibiotic formulations to the list of legend drugs.	Not yet filed
NARCAN OTC status	Draft CR-101	Reclassifying 4mg of NARCAN as an OTC, amending WAC 246-945-030 and creating a new section of WAC	Not yet filed
White Bagging and Brown Bagging	CR-101 under division review	Establishing standards around the practice of white bagging and brown bagging	Not yet filed

PQAC Rules Tracker (cont.)

Title	Status	Short Description	Most Recent WSR #
Health Equity Training – ESSB 5229 (standard)	Public comment period for 10/19 public hearing	Amend sections in Chapter 246-945 WAC pertaining to continuing education standards and establishing health equity CE requirements per ESSB 5229.	WSR 23-16-070 (Filed July 27, 2023)
Uniform Controlled Substances Act – Title 21 CFR (expedited)	Public comment period	Amend language in WAC 246-945-040 to incorporate by reference any changes in Title 21 CFR made after the rule’s effective date	WSR 23-15-015 (Filed July 7, 2023)
Dialysate and dialysis device manufacturer licensing	CR-101 draft pending; policy statement filed in October 2022 under P008	Determine sections in chapter 246-945 WAC (subsection -090 through -093 at least) to amend to comply with SSB 1675	Not yet filed
Access to drugs stored outside pharmacy (standard)	August rules workshop	Allowing access to drugs stored outside the pharmacy by unlicensed employees of a health care facility	WSR 23-01-111 (Filed December 19, 2022)
Mobile OTP unit licensing	CR-101 draft pending	Amend WAC 246-945-060 to clarify licensing standards for mobile OTP units	Not yet filed
Zero Order Reports and Suspicious Orders (standard)	CR-101 filed; drafting rule language	Amending WAC 246-945-001 and WAC 246-945-585 to adjust suspicious order and zero reporting requirement	WSR 23-10-012 (Filed April 24, 2023)
Technical fixes to chapter 246-945 WAC (expedited)	CR-105 under division review	Typos and small edits to multiple sections in chapter 246-945 WAC	Not yet filed
Removing Fenfluramine from Schedule IV	Petition granted and response sent to petitioner; CR-101 being assembled	Amending chapter 246-945 WAC to remove fenfluramine from the list of Schedule IV substances	Not yet filed
Pharmacist Assistant Scope-of-practice	CR-101 draft pending	Provide clarification to the scope-of-practice for pharmacy assistants, use of technology in a pharmacy, and to define “stocking.”	Not yet filed

6.1.1 - Suspicious Orders and Zero Reports for Wholesalers

Suspicious Orders and Zero Reports Language Draft

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WAC 246-945-585 Wholesaler—Suspicious orders and due diligence. (1) For the purposes of this section and WAC 246-945-590, "suspicious order" means when a wholesale distributor, after completing due diligence, ceases distribution of Schedule II-V drugs or drug(s) of concern to a customer licensed in Washington due to an elevated risk or concerns that controlled substances may potentially be diverted from legitimate channels.

Suspicious Orders and Zero Reports for Wholesalers

(2) Wholesalers shall design and operate a system to identify and report suspicious orders of controlled substances and drugs of concern to the commission.

(a) Suspicious orders shall be submitted electronically ~~through a commission approved system or~~ to the commission ~~or~~ within five business days of ~~the order being identified as suspicious by the wholesaler~~ the wholesaler deciding not to supply the order, and must include, but not necessarily be

limited to:

- (i) Customer name;
- (ii) Customer address;
- (iii) Customer DEA registration number, if applicable;
- (iv) Washington State license number(s);
- (v) ~~Transaction~~Order date;
- (vi) Drug name;
- (vii) NDC number;
- (viii) Quantity ordered; and

(ix) ~~Indication of whether the drug was shipped, and if not, t~~The factual basis for the ~~refusal decision not~~ to supply the drugs ordered by the customer.

(b) Zero reports shall be ~~submitted if~~ maintained by a wholesaler when no suspicious orders have been identified by the wholesaler in a calendar month. ~~Zero reports, and such reports shall be submitted within fifteen business days of the end of the calendar month in a readily retrievable format.~~

(c) Wholesalers may apply to the commission for an exemption from the reporting requirements if they do not distribute controlled substances or drugs of concern.

(d) All information submitted under this section must be readable and accessible to the commission.

(~~23~~) Except as provided in subsection (~~34~~) of this section, a wholesaler shall exercise due diligence to identify customers ordering or seeking to order controlled substances or drugs of concern, and establish the normal and expected transactions conducted by those customers, as well as ~~to~~ identify and prevent the sale of controlled substances or drugs of concern that are likely to be diverted from legitimate channels. Such due diligence measures shall include, but are not limited to, the following, which shall be conducted prior to an initial sale and on a regular basis, as necessary:

(a) Questionnaires and affirmative steps by the wholesaler to confirm the accuracy and validity of the information provided, it shall be considered illegal for a customer to provide false or misleading information;

(b) For a customer who is a prescriber, confirmation of prescriber type, specialty practice area, and if the prescriber personally furnishes controlled substances or drugs of concern, the quantity furnished;

(c) Review of drug utilization reports; and

(d) Obtaining and conducting a review of the following:

(i) Methods of payment accepted and in what ratios;

(ii) The ratio of controlled versus noncontrolled prescriptions and overall sales;

(iii) Orders for controlled substances or drugs of concern from other wholesalers U.S. DEA's Automation of Reports and Consolidated Orders System (ARCOS); and

(iv) The ratio of out-of-state patients served compared to in-state patients.

~~(34)~~ A wholesaler receiving a request for an initial sale of a controlled substance or drugs of concern may conduct the sale before complying with subsection ~~(23)~~ of this section if all of the following apply:

(a) The sale is to a new customer;

(b) The wholesaler documents that the order is to meet an emergent need;

(c) The wholesaler completes the requirements of subsection ~~(23)~~ of this section no later than sixty business days from the date of sale.

~~(4) A wholesaler receiving a request from an existing customer to purchase a controlled substance or drug of concern, the size/quantity of which exceeds the established algorithm limitations or quota restrictions for such customer, may sell the drug of concern or controlled substance provided the customer submit documentation explaining the request.~~

(5) Any potential customer that the wholesaler refuses to onboard or current customer that is believed to be engaged in potential diversion activity, including those to whom a wholesaler refuses to sell, the wholesaler terminates due to a concern for diversion of controlled substances or drugs of concern shall be electronically reported to the commission. Such reports shall include:

- (a) ~~Customer name~~Name of potential or current customer;
- (b) ~~Customer address~~Address of potential or current customer;
- (c) Potential or current customer's DEA number, if applicable;
- (d) Washington Sstate license number(s);

(e) A detailed explanation of why the wholesaler identified the potential or current customer as a possible diversion risk; and

(f) Such reports shall be submitted within thirty days of ~~refusal, cessation, or~~ identification by the wholesaler of concerns for diversion of controlled substances or drugs of concern involving a potential or current customer.

~~(6) All licensed wholesalers shall submit all reports to the commission in a DEA ARCOS format where applicable.~~

[Statutory Authority: RCW 18.64.005, 18.64.080, 18.130.075, 18.64.043, 18.64.044, 18.64.045, 18.64.046, 18.64.370, 18.64.460, 69.50.310, 18.64.011, 18.64.245, 18.64.470, 18.64.255, 18.64.205, 18.64.253, 18.64.410, 18.64.500, 18.64.590. WSR 20-12-072, § 246-945-585, filed 6/1/20, effective 7/1/20.]

Access to Drugs Language Draft

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WAC 246-945-455 Drugs stored outside of the pharmacy. (1)

In order for drugs to be stored in a designated area outside the pharmacy including, but not limited to, floor stock, in an emergency cabinet, in an emergency kit, or as emergency outpatient drug delivery from an emergency department at a registered institutional facility, the following conditions must be met:

(a) Drugs stored in such a manner shall remain under the control of, and be routinely monitored by, the supplying pharmacy;

(b) The supplying pharmacy shall develop and implement policies and procedures to prevent and detect unauthorized access, document drugs used, returned and wasted, and regular inventory procedures;

(c) Access to drugs stored in a designated area outside of the pharmacy must be limited to health care professionals licensed under the chapters specified in RCW 18.130.040 acting

within their scope, and nursing students as provided in WAC 246-945-450, except as provided in WAC 246-945-455(2);

(d) The designated area is appropriately equipped to ensure security and protection from diversion or tampering; and

(e) The designated area must be located in a facility licensed or otherwise authorized by law to possess and store drugs.

(2) An unlicensed employee or contractor of the receiving facility may access drugs stored in the designated area if all of the following are met:

(a) The unlicensed employee or contractor is acting within their scope of employment,

(b) The unlicensed employee or contractor is accessing drugs for the purpose of supply chain management at the receiving facility,

(c) The unlicensed employee or contractor is only accessing drugs listed in a policy and procedure that is readily retrievable by the supplying pharmacy, and

(d) The unlicensed employee or contractor is not accessing controlled substances under any circumstances.

(3) For nursing homes and hospice programs an emergency kit or supplemental dose kit must comply with RCW 18.64.560.

[Statutory Authority: RCW 18.64.005, 18.64.080, 18.130.075, 18.64.043, 18.64.044, 18.64.045, 18.64.046, 18.64.370, 18.64.460, 69.50.310, 18.64.011, 18.64.245, 18.64.470, 18.64.255, 18.64.205, 18.64.253, 18.64.410, 18.64.500, 18.64.590. WSR 20-12-072, § 246-945-455, filed 6/1/20, effective 7/1/20.]

DRAFT



RULE-MAKING ORDER EMERGENCY RULE ONLY

CR-103E (December 2017) (Implements RCW 34.05.350 and 34.05.360)

CODE REVISER USE ONLY

OFFICE OF THE CODE REVISER
STATE OF WASHINGTON
FILED

DATE: July 07, 2023

TIME: 12:07 PM

WSR 23-15-017

Agency: Department of Health - Pharmacy Quality Assurance Commission

Effective date of rule:

Emergency Rules

- Immediately upon filing.
 Later (specify)

Any other findings required by other provisions of law as precondition to adoption or effectiveness of rule?

- Yes No If Yes, explain:

Purpose: Medication assistance in community-based and in-home care settings. As provided in RCW 69.41.010 (15) the Pharmacy Quality Assurance Commission (commission) and Department of Health (department) are filing jointly to reinstate medication assistance rules as permitted under chapter 69.41 RCW by adopting new rules in WACs 246-945-710, 246-945-712, 246-945-714, 246-945-716, 246-945-718, 246-945-720, 246-945-722, 246-945-724, 246-945-726, and 246-945-728. This adopted emergency rule will extend WSR 23-07-056 filed on March 09, 2023 without change.

This rule establishes criteria for medication assistance in community-based and in-home care settings in accordance with chapter 69.41 RCW. The definition for medication assistance provided in RCW 69.41.010(15) states:

"Medication assistance" means assistance rendered by a nonpractitioner to an individual residing in a community-based care setting or in-home care setting to facilitate the individual's self-administration of a legend drug or controlled substance. It includes reminding or coaching the individual, handing the medication container to the individual, opening the individual's medication container, using an enabler, or placing the medication in the individual's hand, and such other means of medication assistance as defined by rule adopted by the department.

These emergency rules provide further definitions for terms used within this definition such as "enabler" and establish those "other means of medication assistance as defined by rule adopted by the department." These rules help impacted individuals retain their independence and live in the least restrictive setting, such as their own home, longer by providing means and guidance for medication assistance.

Citation of rules affected by this order:

New: WAC 246-945-710, 246-945-712, 246-945-714, 246-945-716, 246-945-718, 246-945-720, 246-945-722, 246-945-724, 246-945-726, 246-945-728
Repealed: None
Amended: None
Suspended: None

Statutory authority for adoption: RCW 18.64.005; RCW 69.41.010(15); RCW 69.41.075

Other authority:

EMERGENCY RULE

Under RCW 34.05.350 the agency for good cause finds:

- That immediate adoption, amendment, or repeal of a rule is necessary for the preservation of the public health, safety, or general welfare, and that observing the time requirements of notice and opportunity to comment upon adoption of a permanent rule would be contrary to the public interest.
 That state or federal law or federal rule or a federal deadline for state receipt of federal funds requires immediate adoption of a rule.

Reasons for this finding: The commission's new chapter, chapter 246-945 WAC, became effective in July 2020. The old rules, including the former rules on medication assistance (chapter 246-888 WAC), were repealed in March 2021. The commission's repeal of chapter 246-888 WAC has resulted in unintended disruptions for medication assistance in the community-based and in-home care settings permitted under chapter 69.41 RCW. Emergency rulemaking is necessary to immediately restore medication assistance regulations to preserve patient safety and welfare while the commission and the department work on permanent rulemaking. The CR-101 was filed on December 27, 2021 under WSR 22-02-015. Permanent rulemaking was originally delayed due to the novel coronavirus COVID-19 pandemic but is still in progress. Commission staff and the Department of Social and Health Services (DSHS) met for preliminary discussions regarding draft language. Drafts of the amended rule language were written by commission staff and shared with DSHS personnel for interagency review. The commission will distribute draft language to the public leading up to the planned workshops in early fall of 2023.

**Note: If any category is left blank, it will be calculated as zero.
No descriptive text.**

**Count by whole WAC sections only, from the WAC number through the history note.
A section may be counted in more than one category.**

The number of sections adopted in order to comply with:

Federal statute:	New	<u>0</u>	Amended	<u>0</u>	Repealed	<u>0</u>
Federal rules or standards:	New	<u>0</u>	Amended	<u>0</u>	Repealed	<u>0</u>
Recently enacted state statutes:	New	<u>0</u>	Amended	<u>0</u>	Repealed	<u>0</u>

The number of sections adopted at the request of a nongovernmental entity:

New	<u>0</u>	Amended	<u>0</u>	Repealed	<u>0</u>
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The number of sections adopted on the agency's own initiative:

New	<u>10</u>	Amended	<u>0</u>	Repealed	<u>0</u>
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The number of sections adopted in order to clarify, streamline, or reform agency procedures:

New	<u>0</u>	Amended	<u>0</u>	Repealed	<u>0</u>
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The number of sections adopted using:

Negotiated rule making:	New	<u>0</u>	Amended	<u>0</u>	Repealed	<u>0</u>
Pilot rule making:	New	<u>0</u>	Amended	<u>0</u>	Repealed	<u>0</u>
Other alternative rule making:	New	<u>10</u>	Amended	<u>0</u>	Repealed	<u>0</u>

Date Adopted: 7/6/2023

Name: Kenneth Kenyon, PharmD, MBA | Kristin Peterson, JD for Umair A. Shah MD, MPH

Title: Pharmacy Quality Assurance Commission Chair | Chief of Policy for Secretary of Health

Signature:

Kenneth Kenyon

Kristin Peterson

PART 5 - MEDICATION ASSISTANCE

NEW SECTION

WAC 246-945-710 Scope and applicability. (1) This section through WAC 246-945-728 only apply to medication assistance provided in community-based care settings and in-home care settings.

(2) The following definitions apply to this section through WAC 246-945-728 unless the context requires otherwise:

- (a) "Medication" means legend drugs and controlled substances; and
- (b) "Practitioner" has the same meaning as in RCW 69.41.010(17).

NEW SECTION

WAC 246-945-712 Self-administration with assistance, independent self-administration, and medication administration. (1) Self-administration with assistance means assistance with legend drugs and controlled substances rendered by a nonpractitioner to an individual residing in a community-based care setting or an in-home care setting. It includes reminding or coaching the individual to take their medication, handing the medication container to the individual, opening the medication container, using an enabler, or placing the medication in the hand of the individual/resident. The individual/resident must be able to put the medication into their mouth or apply or instill the medication. The individual/resident does not necessarily need to state the name of the medication, intended effects, side effects, or other details, but must be aware that they are receiving medication. Assistance may be provided by a nonpractitioner with prefilled insulin syringes. Assistance is limited to handing the prefilled insulin syringe to an individual/resident. Assistance with the administration of any other intravenous or injectable medication is specifically excluded. The individual/resident retains the right to refuse medication. Self-administration with assistance shall occur immediately prior to the ingestion or application of a medication.

(2) Independent self-administration occurs when an individual/resident is independently able to directly apply a legend drug or controlled substance by ingestion, inhalation, injection or other means. In licensed assisted living facilities, self-administration may include situations in which an individual cannot physically self-administer medications but can accurately direct others. These regulations do not limit the rights of people with functional disabilities to self-direct care according to chapter 74.39 RCW.

(3) If an individual/resident is not able to physically ingest or apply a medication independently or with assistance, then the medication must be administered to the individual/resident by a person legally authorized to do so (e.g., physician, nurse, pharmacist). All

laws and regulations applicable to medication administration apply. If an individual/resident cannot safely self-administer medication or self-administer with assistance or cannot indicate an awareness that they are taking a medication, then the medication must be administered to the individual/resident by a person legally authorized to do so.

NEW SECTION

WAC 246-945-714 Self-administration with assistance in a community-based care setting or an in-home setting. (1) An individual/resident, or their representative, in a community-based care setting or an in-home setting may request self-administration with assistance.

(2) No additional separate assessment or documentation of the needs of the individual/resident are required in order to initiate self-administration with assistance. It is recommended that providers document their decision-making process in the health record of the individual or resident health record.

(3) A nonpractitioner may help in the preparation of legend drugs and controlled substances for self-administration where a practitioner has determined and communicated orally or by written direction that such medication preparation assistance is necessary and appropriate.

NEW SECTION

WAC 246-945-716 Enabler. (1) Enablers are physical devices used to facilitate an individual's/resident's self-administration of a medication. Physical devices include, but are not limited to, a medicine cup, glass, cup, spoon, bowl, prefilled syringes, syringes used to measure liquids, specially adapted table surface, straw, piece of cloth, or fabric.

(2) An individual's hand may also be an enabler. The practice of "hand-over-hand" administration is not allowed. Medication administration with assistance includes steadying or guiding an individual's hand while he or she applies or instills medications such as ointments, eye, ear, and nasal preparations.

NEW SECTION

WAC 246-945-718 Alteration of medication for self-administration with assistance. Alteration of a medication for self-administration with assistance includes, but is not limited to, crushing tablets, cutting tablets in half, opening capsules, mixing powdered medications with foods or liquids, or mixing tablets or capsules with foods or liquids. Individuals/residents must be aware that the medication is being altered or added to their food.

NEW SECTION

WAC 246-945-720 Medication alteration. A practitioner practicing within their scope of practice must determine that it is safe to alter a legend drug or controlled substance. If the medication is altered, and a practitioner has determined that such medication alteration is necessary and appropriate, the determination shall be communicated orally or by written direction. Documentation of the appropriateness of the alteration must be on the prescription container, or in the individual's/resident's record.

NEW SECTION

WAC 246-945-722 Types of assistance provided by nonpractitioner. A nonpractitioner can transfer a medication from one container to another for the purpose of an individual dose. Examples include: Pouring a liquid medication from the medication container to a calibrated spoon or medication cup.

NEW SECTION

WAC 246-945-724 Oxygen order/prescription requirements. Under state law, oxygen is not a medication and is not covered under this rule. While oxygen is not considered a medication under state law, oxygen does require an order/prescription from a practitioner.

NEW SECTION

WAC 246-945-726 Self-administration with assistance of medication through a gastrostomy or "g-tube." If a prescription is written as an oral medication via "g-tube," and if a practitioner has determined that the medication can be altered, if necessary, for use via "g-tube," the rules as outlined for self-administration with assistance would also apply.

NEW SECTION

WAC 246-945-728 Other medication assistance requirements. A practitioner, nonpractitioner, and an individual/resident or their representative should be familiar with the rules specifically regulating the residential setting. The department of social and health services has adopted rules relating to medication services in assisted living facilities and adult family homes.

Incorporations by Reference Language Draft

PharmacyRules@doh.wa.gov

AMENDATORY SECTION (Amending WSR 20-12-072, filed 6/1/20, effective 7/1/20)

WAC 246-945-010 Prescription and chart order—Minimum

requirements. (1) For the purposes of this section, prescription does not include chart orders as defined in RCW 18.64.011(3).

(2) For the purposes of WAC 246-945-010 through 246-945-013, prescription includes written and electronic prescriptions.

(3) A prescription for a noncontrolled legend drug must include, but is not limited to, the following:

(a) Prescriber's name;

(b) Name of patient, authorized entity, or animal name and species;

(c) Date of issuance;

(d) Drug name, strength, and quantity;

(e) Directions for use;

(f) Number of refills (if any);

(g) Instruction on whether or not a therapeutically equivalent generic drug or interchangeable biological product may be substituted, unless substitution is permitted under a prior-consent authorization;

(h) Prescriber's manual or electronic signature, or prescriber's authorized agent signature if allowed by law; and

(i) If the prescription is written, it must be written on tamper-resistant prescription pad or paper approved by the commission pursuant to RCW 18.64.500;

(4) A prescription for a controlled substance must include all the information listed in subsection (1) of this section and the following:

(a) Patient's address;

(b) Dosage form;

(c) Prescriber's address;

(d) Prescriber's DEA registration number; and

(e) Any other requirements listed in ((21 C.F.R., Chapter II))

~~Title 21 Chapter II of the C.F.R. Title 21 of the Code of Federal Regulations Sections 1300 through 1399~~ that was incorporated by reference and in effect as of May 4, 2023.

(5) A chart order must meet the requirements of RCW 18.64.550 and any other applicable requirements listed in ((21 C.F.R., Chapter II))

Title 21 Chapter II of the C.F.R. 21 C.F.R. Sec. 1300 - 1399 that was incorporated by reference and in effect as of May 4, 2023.

(6) A controlled substance listed in Schedule II can only be dispensed pursuant to a valid prescription in accordance with WAC 246-945-011 unless there is an "emergency."

(a) For the purposes of this subsection, an "emergency" exists when the immediate administration of the drug is necessary for proper treatment and no alternative treatment is available, and further, it is not possible for the practitioner to provide a written or electronic prescription for the drug at that time.

(b) If a Schedule II drug is dispensed in an emergency, the practitioner must deliver a signed prescription to the dispenser within seven days after authorizing an emergency oral prescription or if delivered by mail it must be postmarked within the seven day period, and further the pharmacist must note on the prescription that it was filled on an emergency basis.

(7) A controlled substance listed in Schedule III, IV, or V, can only be dispensed pursuant to a valid prescription in accordance with WAC 246-945-011, or an oral prescription. An oral prescription for a controlled substance listed in Schedule III, IV, or V must be promptly

reduced to a written or electronic prescription that complies with WAC 246-945-011.

(8) A noncontrolled legend drug can only be dispensed pursuant to a valid prescription in accordance with WAC 246-945-011, or an oral prescription. An oral prescription for a noncontrolled legend drug must be promptly reduced to a written or electronic prescription that complies with WAC 246-945-011.

[Statutory Authority: RCW 18.64.005, 18.64.080, 18.130.075, 18.64.043, 18.64.044, 18.64.045, 18.64.046, 18.64.370, 18.64.460, 69.50.310, 18.64.011, 18.64.245, 18.64.470, 18.64.255, 18.64.205, 18.64.253, 18.64.410, 18.64.500, 18.64.590. WSR 20-12-072, § 246-945-010, filed 6/1/20, effective 7/1/20.]

AMENDATORY SECTION (Amending WSR 20-12-072, filed 6/1/20, effective 7/1/20)

WAC 246-945-013 Partial filling of prescriptions. (1) A pharmacist may partially fill a prescription for noncontrolled legend drugs and controlled substances listed in Schedule III through V provided that:

(a) The partial fill is requested by the patient or the prescriber;

(b) The partial filling is recorded in the same manner as a refilling;

(c) The total quantity dispensed and delivered in all partial fillings must not exceed the total quantity prescribed; and

(d) Partial fills for controlled substances listed in Schedule III through V comply with ((21 C.F.R. Sec. 1306.23)) Title 21 Sec. 1306.23 of the C.F.R. Title 21 of the Code of Federal Regulations Section 136.23 that was incorporated by reference and in effect as of May 4, 2023.

(2) A pharmacist may partially fill a prescription for a controlled substance listed in Schedule II within the limits of RCW 18.64.265, ((21 U.S.C. Sec. 829, and 21 C.F.R. Sec. 1306.13)) Title 21 Sec. 829 of the U.S.C., and Title 21 Sec. 1306.13 of the C.F.R. Title 21 of the United States Code Section 829 and 21 C.F.R. Sec. 1306.13 that was incorporated by reference and in effect as of May 4, 2023, as applicable.

[Statutory Authority: RCW 18.64.005, 18.64.080, 18.130.075, 18.64.043, 18.64.044, 18.64.045, 18.64.046, 18.64.370, 18.64.460, 69.50.310, 18.64.011, 18.64.245, 18.64.470, 18.64.255, 18.64.205, 18.64.253,

18.64.410, 18.64.500, 18.64.590. WSR 20-12-072, § 246-945-013, filed 6/1/20, effective 7/1/20.]

AMENDATORY SECTION (Amending WSR 20-12-072, filed 6/1/20, effective 7/1/20)

WAC 246-945-030 Identification of legend drugs for purposes of chapter 69.41 RCW. (1) Those drugs determined by the FDA to require a prescription under federal law should be classified as legend drugs under state law because their toxicity, potential for harmful effect, methods of use, or collateral measures necessary to their use indicate they are only safe for use under the supervision of a practitioner.

(2) The commission finds that under state law, legend drugs are those drugs designated as legend drugs under federal law, as of the date of adoption of this rule, and listed in at least one of the following publications that are incorporated by reference and in effect as of May 4, 2023, unless the drug is identified as an over-the-counter drug by the commission in WAC 246-945-034:

(a) The ((39th)) 43rd Edition, including supplements, of the *Approved Drug Products with Therapeutic Equivalence Evaluations "Orange Book"* (available at <https://www.fda.gov/drugs/drug-approvals->

and-databases/approved-drug-products-therapeutic-equivalence-evaluations-orange-book).

(b) The ((2019)) 2023 version, including monthly updates, of the *Approved Animal Drug Products "Green Book"* (available at <https://www.fda.gov/animal-veterinary/products/approved-animal-drug-products-green-book>).

(c) The ((2019)) 2023 *List of Licensed Biological Products with Reference Product Exclusivity and Biosimilarity or Interchangeability Evaluations "Purple Book"* (available at <https://www.fda.gov/drugs/therapeutic-biologics-applications-bla/purple-book-lists-licensed-biological-products-reference-product-exclusivity-and-biosimilarity-or>).

(3) Copies of the reference material listed in subsection (2) of this section are available for public inspection at the commission's office at Department of Health, Town Center 2, 111 Israel Road S.E., Tumwater, WA 98501.

(4) The commission also identifies those ephedrine products specified in WAC 246-945-031 as legend drugs under state law.

(5) There may be changes in the marketing status of drugs after the publication of the above references. Upon application of a manufacturer or distributor, the commission may grant authority for

the over-the-counter distribution of certain drugs designated as legend drugs in these references. These determinations will be made after public hearing and will be published as an amendment to this chapter.

[Statutory Authority: RCW 18.64.005, 18.64.080, 18.130.075, 18.64.043, 18.64.044, 18.64.045, 18.64.046, 18.64.370, 18.64.460, 69.50.310, 18.64.011, 18.64.245, 18.64.470, 18.64.255, 18.64.205, 18.64.253, 18.64.410, 18.64.500, 18.64.590. WSR 20-12-072, § 246-945-030, filed 6/1/20, effective 7/1/20.]

NEW SECTION

WAC 246-945-034 Identification of the over-the-counter drugs.

Although listed as a legend drug in publications that are incorporated by reference in WAC 246-945-030(2), the commission identifies the following as an over-the-counter drug in Washington:

(1) 4 mg naloxone hydrochloride nasal spray under the following brand names: Narcan Nasal Spray, approved by the FDA for distribution as an OTC drug product.

(2) 3 mg naloxone hydrochloride nasal spray under the following brand names: RiVive, approved by the FDA for distribution as an OTC drug product.

(3) 0.075 mg norgestrel tablets under the following brand names: Opill, approved by the FDA for distribution as an OTC drug product.

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AMENDATORY SECTION (Amending WSR 20-12-072, filed 6/1/20, effective 7/1/20)

WAC 246-945-550 ~~Manufacturers—Minimum standards.~~ (1)

Manufacturers shall comply with the applicable requirements in ((21 C.F.R., Part 210)) the material incorporated by reference in ~~Title 21 Part 210 of the C.F.R.~~ Title 21 of the Code of Federal Regulations Section 210, "Current Good Manufacturing Practice in Manufacturing, Processing, Packing, or Holding of Drugs"; and ((21 C.F.R., Part 211)) Title 21 Part 211 of the C.F.R. 21 C.F.R. Sec. 211, "Current Good Manufacturing Practice for Finished Pharmaceuticals; General((-))" in effect as of May 4, 2023.

(2) Manufacturers required to register with the FDA as an outsourcing facility as defined in ((21 U.S.C. Sec. 353b(d)(4)(A))

the material incorporated by reference in ~~Title 21 Sec. 353b(d)(4)(A)~~
U.S.C. Title 21 of the United States Code Section 353b (d) (4) (A) in
effect as of May 4, 2023, shall also comply with FDA guidance
document.

(3) Virtual manufacturers shall ensure its own drugs are
manufactured in compliance with this section.

[Statutory Authority: RCW 18.64.005, 18.64.080, 18.130.075, 18.64.043,
18.64.044, 18.64.045, 18.64.046, 18.64.370, 18.64.460, 69.50.310,
18.64.011, 18.64.245, 18.64.470, 18.64.255, 18.64.205, 18.64.253,
18.64.410, 18.64.500, 18.64.590. WSR 20-12-072, § 246-945-550, filed
6/1/20, effective 7/1/20.]

AMENDATORY SECTION (Amending WSR 20-12-072, filed 6/1/20, effective
7/1/20)

WAC 246-945-565 Wholesaler—Drug storage. (1) Drugs must be
stored at temperatures and under conditions required by the labeling
of the drugs, if any, or by the requirements of the 43rd edition of
USP and 38th edition of the National Formulary (USP/NF) that was
incorporated by reference and in effect as of May 4, 2023, to preserve
product identity, strength, quality, and purity. The USP/NF is

available for public inspection at the commission's office at Department of Health, Town Center 2, 111 Israel Road S.E., Tumwater, WA 98501. Requestors may also contact USP directly to obtain copies.

(2) If no storage requirements are established for a drug, the drug may be held at "controlled" room temperature, as defined in an official compendium, to help ensure that its identity, strength, quality, and purity are not adversely affected.

(3) Temperature and humidity recording equipment, devices, and/or logs shall be used to document proper storage of drugs.

(4) Controlled substance drugs should be isolated from noncontrolled substance drugs and stored in a secured area.

(5) Drugs that are outdated, damaged, deteriorated, misbranded, or adulterated must be physically separated from other drugs in a designated quarantine area until destroyed or returned to the original manufacturer or third party returns processor.

(6) Used drugs and those whose immediate or sealed outer or sealed secondary containers have been opened are adulterated and must be quarantined.

(7) Drugs must be quarantined under any condition that causes doubt as to a drug's safety, identity, strength, quality, or purity

unless under examination, testing, or other investigation the drug is proven to meet required standards.

[Statutory Authority: RCW 18.64.005, 18.64.080, 18.130.075, 18.64.043, 18.64.044, 18.64.045, 18.64.046, 18.64.370, 18.64.460, 69.50.310, 18.64.011, 18.64.245, 18.64.470, 18.64.255, 18.64.205, 18.64.253, 18.64.410, 18.64.500, 18.64.590. WSR 20-12-072, § 246-945-565, filed 6/1/20, effective 7/1/20.]

DRAFT

Day 2

August 25, 2023

3.1 - Budget Subcommittee - PQAC FM24-25 Commission Meeting Report



Pharmacy Quality Assurance Commission
2021-23 Budget & Fund Balance Overview
 For the Period July 1, 2021 through June 30, 2023

Health Professions Account Beginning Fund Balance on July 1, 2021	2,493,136
Revenue To-Date	19,300,590
21-23 HELMS Assessment To-Date	Projected 1,511,515
Expenses To-Date	14,135,931
Health Professions Account Fund Balance as of June 30, 2023	6,146,280

REVENUE	ESTIMATED REVENUE	ACTUAL REVENUE	VARIANCE	% OF ESTIMATED
To-Date	15,014,691	19,300,590	(307,727)	128.5%
Biennium Total	19,608,317			98.43%

EXPENSES - Health Professions Account	TOTAL BIEN BUDGET	BUDGET TO-DATE	EXPENSES TO-DATE	VARIANCE TO-DATE	VARIANCE TO-DATE %
Staff Salaries and Benefits	5,420,468	5,420,468	5,332,961	87,507	1.6%
Commission Pay	92,815	92,815	71,525	21,290	22.9%
Professional Service Contracts	15,456	15,456	485	14,971	96.9%
Attorney General Support	218,621	218,621	522,146	(303,525)	-138.8%
Goods and Services	91,091	91,091	59,584	31,507	34.6%
Travel	99,469	99,469	89,253	10,216	10.3%
IT Equipment	28,656	28,656	18,948	9,708	33.9%
WA Recovery Assist. Prog. for Pharmacy (WRAPP)	134,952	134,952	162,630	(27,678)	-20.5%
Intra-Agency Charges - Discipline	1,663,756	1,663,756	1,283,284	380,472	22.9%
Intra-Agency Charges - Credentialing	3,226,935	3,226,935	3,138,435	88,500	2.7%
Intra-Agency Charges - Other	660,067	663,315	660,811	2,504	0.4%
Total Direct Costs	11,652,286	11,655,534	11,340,063	315,471	2.7%
Agency Indirect Costs	1,935,944	1,935,944	1,711,704	224,240	11.6%
Division Indirect Costs	1,292,404	1,292,404	1,084,164	208,240	16.1%
Total Indirect Costs	3,228,349	3,228,349	2,795,868	432,481	13.4%
Grand Total	14,880,635	14,883,883	14,135,931	747,952	5.0%

