

Pharmacy	Policy		
Title	Hazardous Drug Handling – Sterile Compounding Pharmacy		
Policy No.	5.35 – Choice	Revision	0

- Compounding HDs that can be assayed include cyclophosphamide, ifosfamide, methotrexate, fluorouracil, and platinum-containing drugs. Many assays are being developed. Research suppliers to ensure appropriate residues will be detected if present.
- If any measurable contamination is found, the designated person must identify, document, and contain the cause of contamination. This may include:
 - Performing thorough deactivation, decontamination and cleaning
 - Reevaluating work practices
 - Re-training personnel
 - Improving engineering controls.
 - Repeating the wipe sampling to validate that the deactivation/decontamination and cleaning steps have been effective.

11.00 Disposal

- The pharmacy has contracted with a hazardous waste disposal company.
- The company has provided color-coded bins in which to put hazardous waste and/or contaminated materials. Black for contaminated or HD waste, yellow for trace-contaminated materials, and red for nonhazardous or sharps.
- HD waste bins are located in all areas where HDs are handled.
- All personnel are trained in the appropriate procedures to identify and handle HD waste, and in cleaning of areas that may be contaminated with HD residue. This includes all housekeeping or custodial personnel that perform cleaning or waste removal from the pharmacy.
- Appropriate disposal of HD waste is handled by the contracted HD waste disposal company.
- If the pharmacy does not contract with a company, the pharmacy must comply to all local, state, and federal (including EPA) regulations for the segregation, handling, and disposal of HD waste.

11.00 Spill control

- Spill kits of the appropriate size and composition to contain and clean up spill of HD handled by the facility.
- Spill kits must be available in areas where HDs are received, stored, compounded, and with delivery drivers.
- All employees are trained in handling spills. Training employees that are delivery drivers, initially annually.
- A “spill” of an HD includes dropping solid dosage forms, spilling of liquid HDs, damaged or leaking containers of HDs received, HD packaging damaged when handling, etc.
- Procedure:
 - A spill is identified.

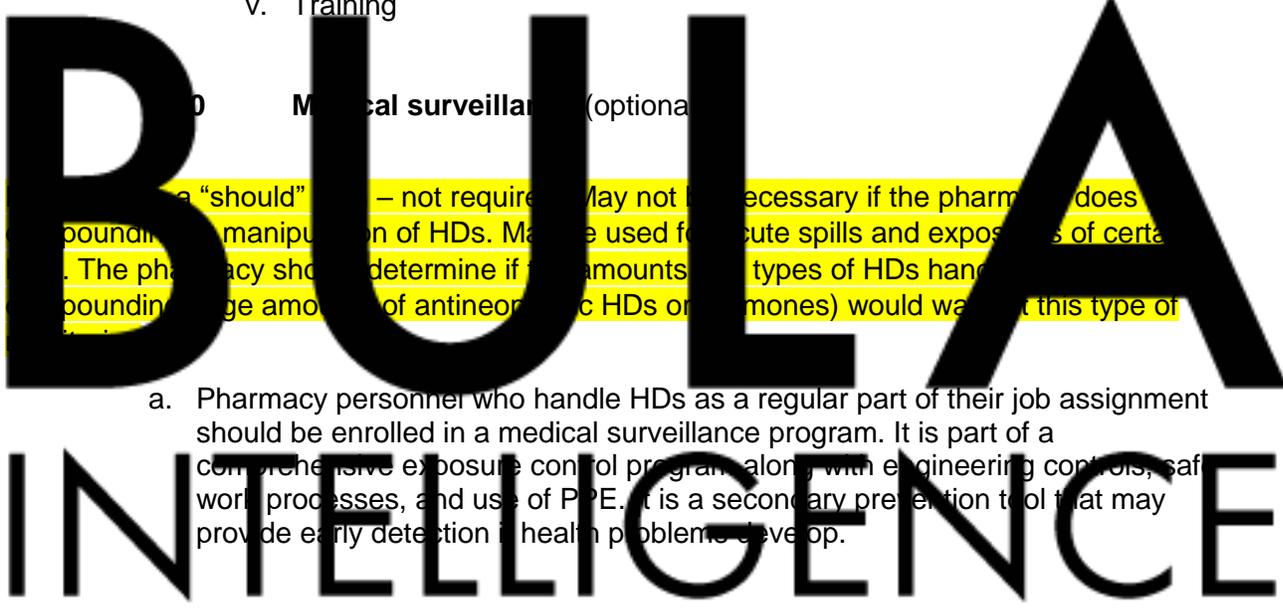
Pharmacy	Policy		
Title	Hazardous Drug Handling – Sterile Compounding Pharmacy		
Policy No.	5.35 – Choice	Revision	0

- ii. Signage is posted or other means used to alert staff to the spill and restrict access to the spill area until clean-up is complete.
- iii. Name appropriate personnel (or spill team, if you have one) dons PPE and retrieves the spill kit. PPE includes a cap and gown, respirator or, if the capacity of the spill kit is exceeded or there is potential exposure to vapors or gases, a full-facepiece, chemical cartridge-type respirator is used.
- iv. The materials in the spill kit are used to contain and soak up any HDs, and to collect any solids, packaging and broken glass for disposal.
- v. The spill area is then thoroughly cleaned by deactivating the HD, decontaminating the area, cleaning and sanitizing.
- vi. All spill and clean-up materials are placed in the bag(s) supplied with the spill kit, sealed, and disposed of as contaminated or bulk hazardous waste (black bin).
- vii. The spill and actions taken afterward are documented.
- f. Personnel and others who are exposed during the spill or clean-up or who have direct skin or eye contact with HDs require immediate evaluation.
 - i. Provide a copy of the HD SDS to medical personnel requesting the evaluation for reference to the specific HD the person was exposed to.
 - ii. Document the exposure
 - iii. Monitor for exposure-related health changes (see 5.35 Medical surveillance)
- g. All spills and any related incidents of exposure are investigated as part of the pharmacy quality program. This may include investigation of:
 - i. Administrative controls
 - ii. Engineering controls
 - iii. PPE and spill kits available
 - iv. SOPs
 - v. Training

5.35 Medical surveillance (optional)

a “should” – not required. May not be necessary if the pharmacy does not routinely perform manipulation of HDs. May be used for acute spills and exposures of certain types of HDs. The pharmacy should determine if large amounts of certain types of HDs handled in the compounding (e.g. amount of antineoplastic HDs or hormones) would warrant this type of surveillance.

- a. Pharmacy personnel who handle HDs as a regular part of their job assignment should be enrolled in a medical surveillance program. It is part of a comprehensive exposure control program, along with engineering controls, safe work processes, and use of PPE. It is a secondary prevention tool that may provide early detection if health problems develop.



Pharmacy	Policy		
Title	Hazardous Drug Handling – Sterile Compounding Pharmacy		
Policy No.	5.35 – Choice	Revision	0

- b. Medical surveillance programs involve assessment and documentation of symptoms, complaints, physical findings, and laboratory values (such as a blood count) to determine whether there is a deviation from the expected norms.
- c. The data-gathering elements of a medical surveillance program are used to establish a baseline of workers' health and then to monitor the future health for changes that may result from exposure to HDs.
- d. Medical surveillance programs also look for trends in population of workers. Examining grouped data compared with data from unexposed workers may reveal a small alteration or increase in the frequency of a health need that would be obscured if individual workers' results alone were considered.

Procedure:

- i. Identify personnel who are potentially exposed to HDs as part of their regular job duties.
- ii. Contract with a health service to perform the tests while protecting the employee medical information.

Have a baseline assessment performed.

1. Medical and reproductive history
2. Physical examination including lab tests linked to target organs based on the types of HDs handled
3. Exposure history (HDs handled, dosage forms, quantities, estimated time handling HDs weekly or monthly, etc.)
4. Blood or urine levels of a specific HD only with acute spills and exposure to the specific HD.
5. Monitoring and documentation performed according to OSHA.
6. Prospective monitoring is performed and monitoring for changes.
7. Develop follow-up plan for changes suggesting toxicity or for those with acute exposure. The occurrence of exposure-related health changes should prompt immediate re-evaluation of primary preventive measures (including administrative and engineering controls, PPE, etc.).

Completion of an exit examination when an employee leaves employment at the pharmacy to document the information on the employee's medical, reproductive, and exposure histories.

References

- USP Chapter <797> Hazardous Drugs
- NIOSH List of Antineoplastic and Other Hazardous Drugs in Healthcare Settings https://www.cdc.gov/niosh/topics/antineoplastic/pdf/hazardous-drugs-list_2016-161.pdf [note that current edition is 2016, the 2018 revision is anticipated to be released in July 2019]

Respirators:

https://www.cdc.gov/niosh/nptl/topics/respirators/asp_part/resresources.html

This template and all others in this manual, are reviewed and updated annually. Due to the dynamic nature of the pharmacy industry, changes may require Bula to make modifications between annual update cycles. As a result, you are advised to check online at <https://www.bulalaw.com> to verify that you are working with the most current version before you customize the template for your pharmacy. This template and all others in this manual, are designed to comply with federal law however, some states have requirements that differ from federal law. We advise consulting a local attorney familiar with your state's laws to determine if any changes are required to meet state-specific laws. Confidential and Proprietary. 2019 copyright. BulaLaw LLC. All rights reserved. May not be reproduced, copied, transmitted in any form, by any means, electronic, mechanical, photo copying, recording or otherwise without prior written permission of Bula Law LLC.

Pharmacy	Policy		
Title	Hazardous Drug Handling – Sterile Compounding Pharmacy		
Policy No.	5.35 – Choice	Revision	0

- Respirator Training: https://www.osha.gov/video/respiratory_protection_attesting_transcript.html
- Medical Surveillance: <https://www.cdc.gov/niosh/docs/wp-solutions/2013-103/pdfs/2013-103.pdf>

[NOTE: Should the respirator and medical surveillance references be incorporated directly into the specific sections or stay here with the references?

VII. Attachments

Hazardous Drug Handling and Exposure Acknowledgement

Hazardous Drug Handling and Exposure Acknowledgement

Employee Print Name: _____

I understand that this pharmacy handles and dispenses hazardous drugs.

Hazardous drugs are those drugs that have one or more of the following characteristics: carcinogenicity, teratogenicity, reproductive toxicity, organ toxicity at low doses, or genotoxicity.

I have been provided training that includes a review of the pharmacy's standard operating procedures (SOPs) and I agree to comply with them.

I have taken and passed the assessment questions for hazardous drug handling, and successfully demonstrated competency in the handling of hazardous drugs.

I am familiar with SDS and the assessment of risk for the hazardous drugs handled at this pharmacy.

I acknowledge that exposure to hazardous drugs may cause acute and chronic effects including skin rashes, infertility, miscarriage, birth defects

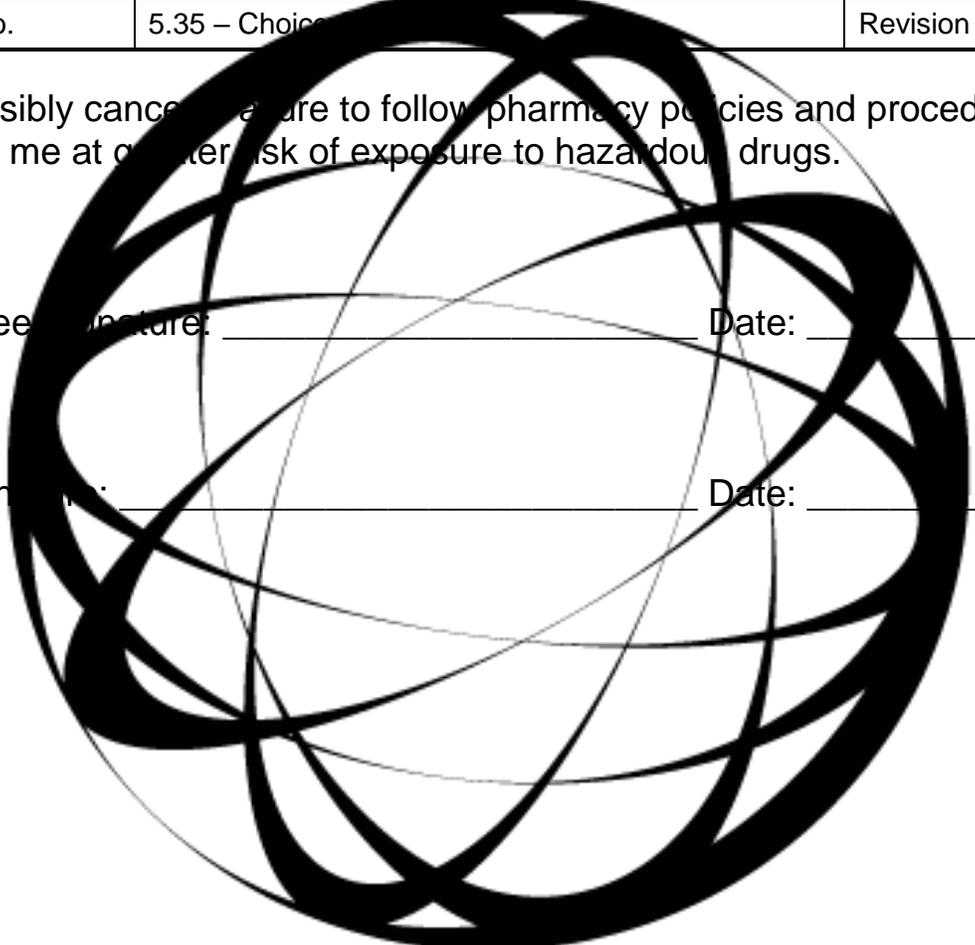
This template and all others in this manual, are reviewed and updated annually. Due to the dynamic nature of the pharmacy industry, changes may require Bula to make modifications between annual update cycles. As a result, you are advised to check online at <https://www.bulalaw.com> to verify that you are working with the most current version before you customize the template for your pharmacy. This template and all others in this manual, are designed to comply with federal law however, some states have requirements that differ from federal law. We advise consulting a local attorney familiar with your state's laws to determine if any changes are required to meet state-specific laws. Confidential and Proprietary. 2019 copyright. BulaLaw LLC. All rights reserved. May not be reproduced, copied, transmitted in any form, by any means, electronic, mechanical, photo copying, recording or otherwise without prior written permission of Bula Law LLC.

Pharmacy	Policy		
Title	Hazardous Drug Handling – Sterile Compounding Pharmacy		
Policy No.	5.35 – Choice	Revision	0

and possibly cancer. Failure to follow pharmacy policies and procedures may put me at greater risk of exposure to hazardous drugs.

Employee Signature: _____ Date: _____

PIC Signature: _____ Date: _____



BULA

INTELLIGENCE

This template and all others in this manual, are reviewed and updated annually. Due to the dynamic nature of the pharmacy industry, changes may require Bula to make modifications between annual update cycles. As a result, you are advised to check online at <https://www.bulalaw.com> to verify that you are working with the most current version before you customize the template for your pharmacy. This template and all others in this manual, are designed to comply with federal law however, some states have requirements that differ from federal law. We advise consulting a local attorney familiar with your state's laws to determine if any changes are required to meet state-specific laws. Confidential and Proprietary. 2019 copyright. BulaLaw LLC. All rights reserved. May not be reproduced, copied, transmitted in any form, by any means, electronic, mechanical, photo copying, recording or otherwise without prior written permission of Bula Law LLC.