Verification of Saleable Returns under the DSCSA

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The DSCSA Path



3PL & Wholesale Distributor reporting to FDA 2014-2015

Product Tracing & Verification

> Authorized Trading Partners 2015

Product Identification (Serialization) 2017-2018 BEGIN AFFIXING

Product Verification (down to package level) 2019 +RETURNS

Licensure standards for 3PLs and wholesale distributors

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Electronic, Interoperable System (product tracing down to package level) 2023

2017/2018 Requirements Underway: **Product Marking**





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2017/2018 is all about labeling product and **NOT** passing serialized data



Product Labeling Guidances Issued

- Product marked with a 2D bar code containing:
 - GTIN/NDC, Serial, Lot, Expiry —
- Manufacturers received Enforcement Discretion allowing them to delay until Nov 2018 to begin affixing new 2D bar codes
- Manufacturers and repackagers received Grandfathering Guidance allowing them to continue to sell unserialized product packaged before Nov 2018





2019 Requirements under Development: Returns Verification



NEW Returns Requirements

- 1) Distributors must associate the original Transaction Information, Transaction History and Transactional Statement with a saleable return.
- 2) Verify that the product identifier affixed to the product corresponds with the data the manufacturer assigned.
 - Manufacturers can send serialized data for their shipments to their trading partners to be used for verification of future saleable returns

---- OR----

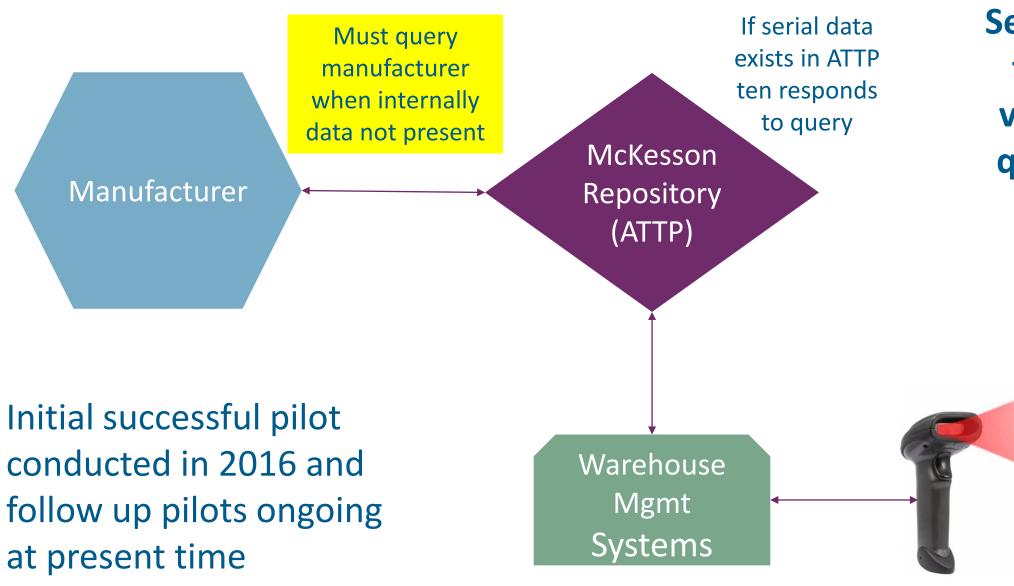
Manufacturers can make serial data available for query using a Verification Router Service requesting data for the distributors

Annual saleable returns in US estimated at 60 million pieces across the industry

McKesson saleable returns approximately 19 Million per year



Returns Verification

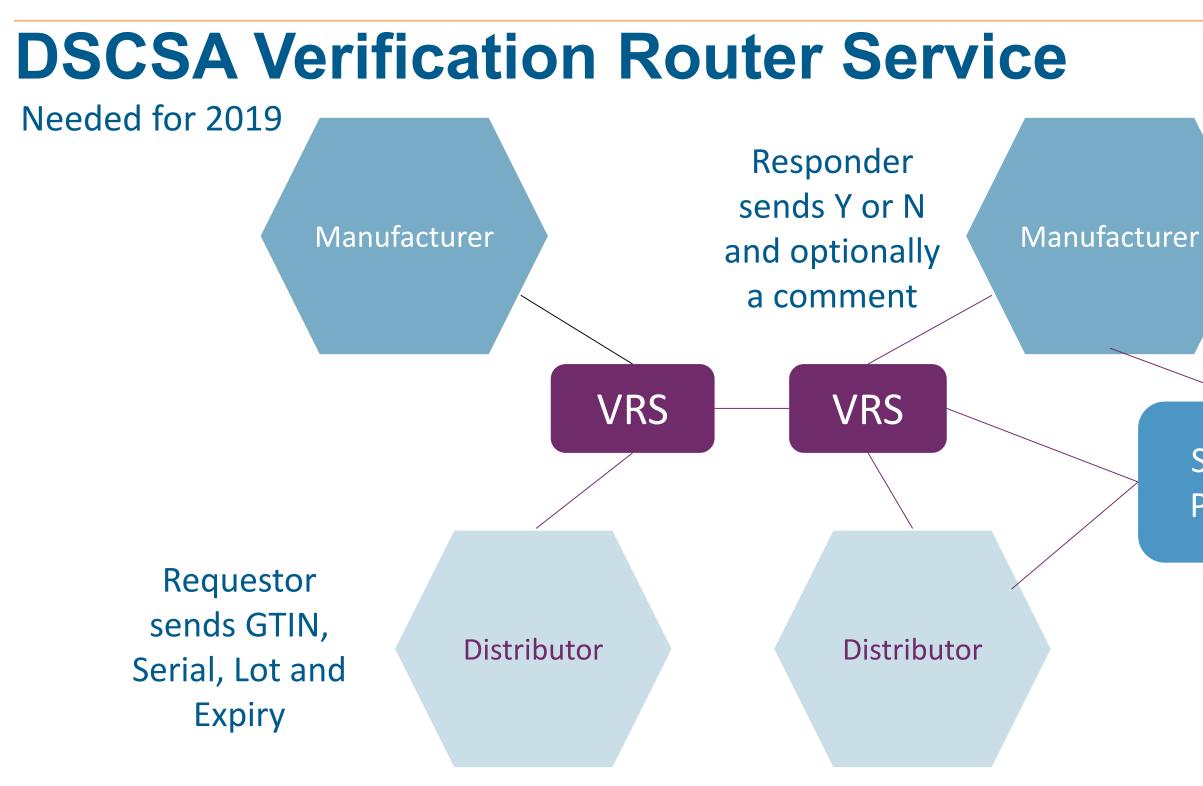


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Serialized product that cannot be verified must be quarantined and investigated

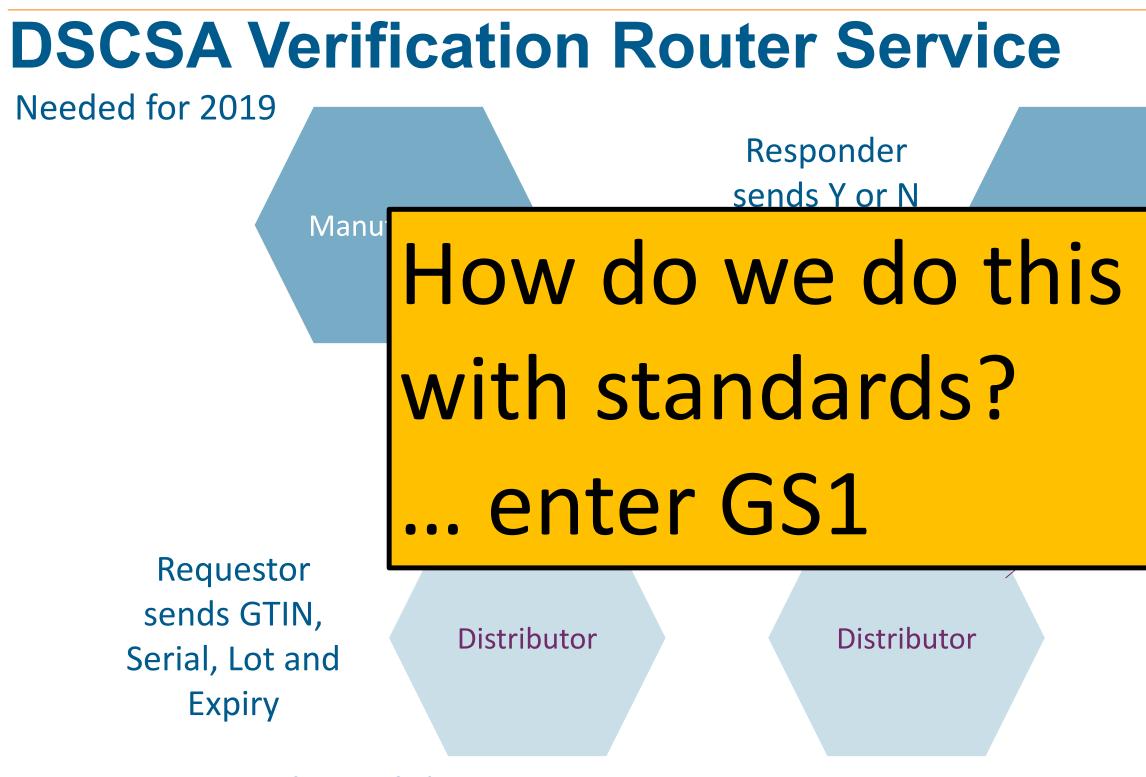




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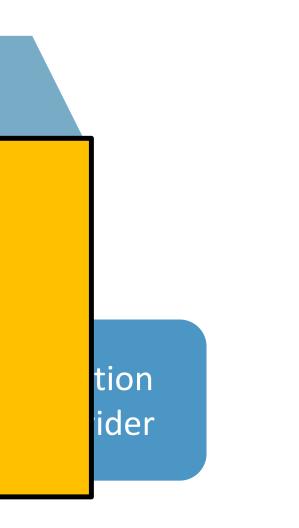
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Solution Provider



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Journey to Verification Messaging Standard

Collaboration between GS1 Global, GS1 US & HDA VRS Taskforce





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GS1 Verification Messaging Standard Designed for global cross sector use

- Driven by urgent (Nov 2019) DSCSA deadlines, but developed as a generic lightweight framework that will support use and extension by other sectors (e.g. food, technical industries) in distinct regulatory jurisdictions
- Specifies a standardised, simple ("lightweight") messaging framework that foresees:
 - verification request and response
 - provision of actionable information that enables the requestor to determine whether to accept, reject, or quarantine the product





GS1 Verification Messaging Standard Positioning within GS1 Architecture

- Verification Message as new addition to the 'Share' layer
- First ever GS1 "Share" standard to...
 - leverage the new GS1 Digital Link standard • (verification request syntax)
 - include JSON as a message response syntax (verification response syntax)





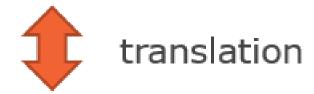


@ GS1 2019

GS1 Verification Messaging Standard What is GS1 Digital Link?

GS1 Digital Link provides a Web-friendly way to express any GS1 identifer (including compound keys) and associated data attributes as a Web URI that works on the Web and enables retrieval of associated information through a straightfoward Web request (HTTP GET)

(01)00361414567894(10)400806(21)1908642E(17)170728



https://id.gs1.org/01/00361414567894/10/400806/21/1908642E?17=170728 https://id.gs1.org/gtin/00361414567894/lot/400806/ser/1908642E?exp=170728 https://example.com/gtin/00361414567894/lot/400806/ser/1908642E?exp=170728

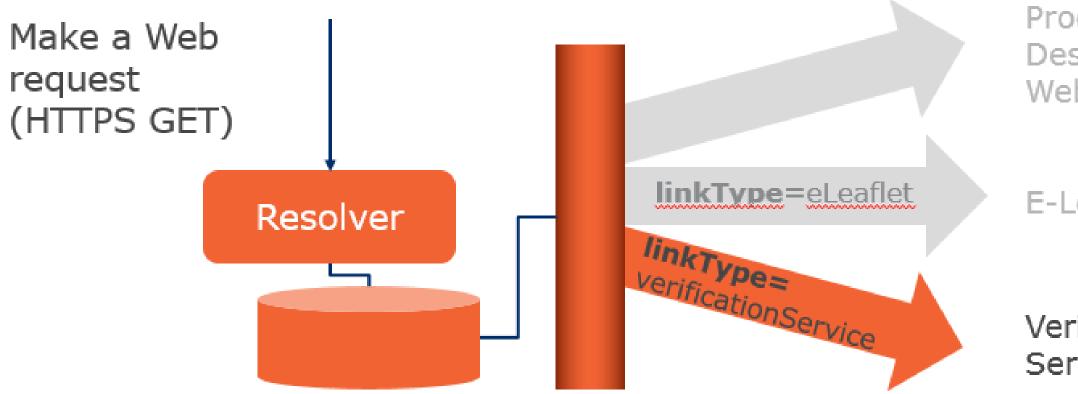


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GS1 Verification Messaging Standard Redirection of GS1 Digital Links

https://id.gs1.org/gtin/00361414567894/lot/400806/ser/1908642E?exp=170728





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Product Description Web Page

E-Leaflet

Verification Service

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GS1 Verification Messaging Standard Verification Requests

- In the DSCSA context, a product instance can be uniquely identified • by the following four data elements:
 - GTIN AI (01)
 - Serial Number AI (21)
 - Batch/Lot Number AI (10)
 - Expiry AI (17)

...encoded in a GS1 DataMatrix as $(01){gtin}(17){exp}(10){lot}(21){ser}$, where {gtin}, {exp}, {lot}, {ser} are placeholders for actual values, e.g.: (01) 00361414567894 (17) 170728 (10) 1908642E (21) 400806



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GS1 Verification Messaging - Requests use of linkType to request specific type of information service

https://id.gs1.org/gtin/00361414567894/lot/1908642E/ser/400806?exp=170728 &linkType=verificationService &context=dscsaSaleableReturn **&corrUUID**=21FC2020-3AFA-4069-A2DD-08002B30309D &reqGLN=0321012345676

GS1 Digital Link (GTIN, Lot, Serial Number, Expiry Date)

linkType=verificationService

context=dscsaSaleableReturn

corrUUID=21EC2020-3AEA-4069-A2DD-08002B30309D

regGLN=0321012345676

(configured for DSCSA Saleable Returns)

Verification

request



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Positive Verification Response

OR

Negative Verification Response

GS1 Verification Messaging Next Steps

Q1/2019

GS1 US Rx workgroup development of Implementation Guideline for Verification Messaging Standard as part of the forthcoming revision (R1.3) of the GS1 US DSCSA guideline / application standard

Q2/2019

Target transition from HDA VRS Request / Response specification to GS1 Verification Messaging Standard



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② GS1 2019



HDA and Industry Next Steps

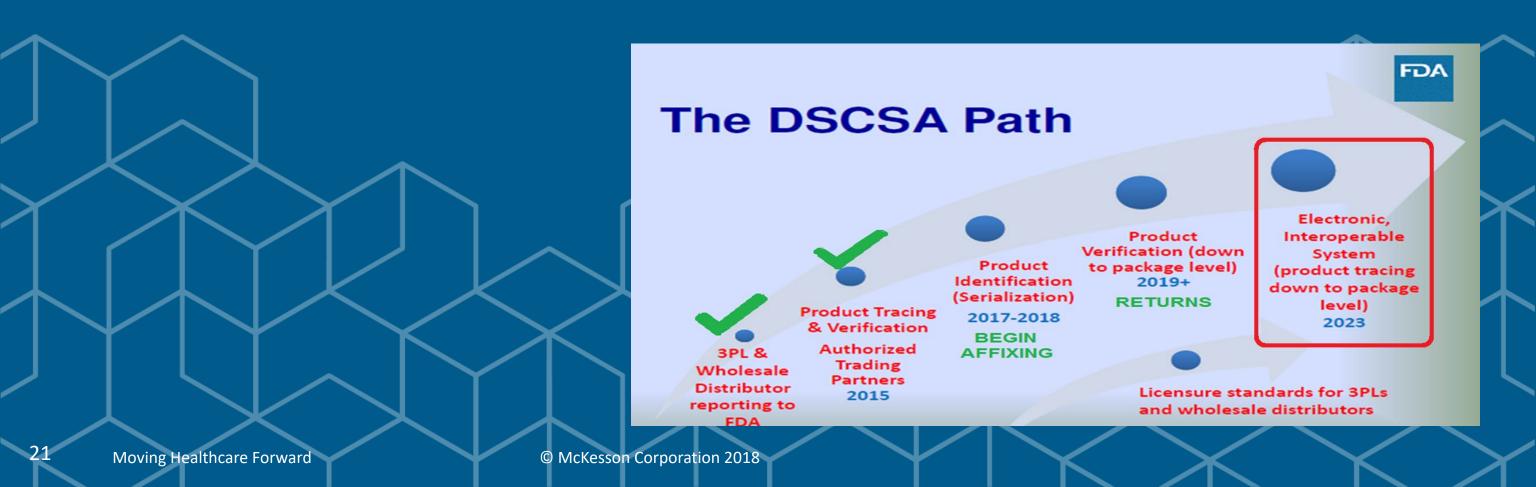
- Solution Providers adopt new messaging standard in to their systems
- HDA exit planning for Verification Router Service
- Long term governance yet to be determined



Thank you!

- Many companies and team members participated in this effort
- Especially though...
 - Craig Alan Repec and Mark Harrison of GS1, Peter Sturtevant of GS1 US,
 - Jeff Denton of Amerisource Bergen, Elizabeth Waldorf of TraceLink and Allison Sheldon of Pfizer

2023 Requirements: Exchanging Serialized DSCSA Data



Serialized DSCSA Data Exchange

- Historical information sunsets in DSCSA transaction data
- Serial number, Lot Number and Expiry become mandatory in DSCSA transaction data
 - Applies to inbound receiving and outbound sales
 - Significant increases in bar code data capture needs



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