



FIGURE 3.4

Approved chemicals are labeled and placed into the supply chain to await being repacked into smaller, more usable amounts. (From PCCA. With permission.)



FIGURE 3.5

Rejected chemicals are labeled, pulled out of the supply chain, and shipped back to the supplier. (From PCCA. With permission.)

According to PCCA personnel, 3% of all shipments fail the QC test and are refused.¹ Rejected shipments become part of supplier reviews and the contract renewal process (Figure 3.5).

The Drug Quality and Security Act

One major item to be determined is the track and trace requirement as dictated by the Drug Quality and Security Act. As of 2014, lawfully compounded drugs are exempt from the track and trace regulations, but not exempt from pedigree requirements.² The critical question is, where does the pedigree start? Does the pedigree have to start with the supplier in