February 5, 2013

Dear CAPS Customer:

For more than 20 years Central Admixture Pharmacy Services, Inc. (CAPS®) has provided a compounded sterile preparation (CSP) admixing service to customers across the nation. The recent meningitis outbreak has caused the health care industry to question every aspect of their CSP procurement programs. Although CAPS is not associated in any way with the meningitis tragedy or any of the pharmacies implicated, we want to reassure you of CAPS business practices, regulatory status, and quality systems. High quality and service to our customers, and mutual patients, are always the highest priorities at CAPS.

CAPS is registered with the FDA, DEA, and state Boards of Pharmacy, and a Certificate of Insurance is available to customers upon request. CAPS dispenses patient specific CSPs and CSPs in anticipation of a prescription. As FDA registrants, CAPS is subject to periodic FDA inspections. CAPS does not dispense, distribute, or otherwise sell copies of commercially available products. CAPS does not dispense CSPs to be used to further compound additional CSPs. All CSPs dispensed by CAPS are intended for direct patient administration. CAPS does not dispense compounded steroid injections.

CAPS’ policy is to use FDA approved, commercially available, sterile drugs as ingredients when available. In cases where FDA approved sterile drug ingredients are not available, vendor qualification, including regulatory compliance audits, must be completed for any Active Pharmaceutical Ingredients (API) used in non-sterile to sterile compounding. All lots of API provided by qualified vendors are tested for chemical identification, impurities, heavy metals, and endotoxin per current USP/NF standards prior to release for use in any CAPS facility. The high risk non-sterile to sterile compounding process is validated every six months through a media-fill validation in accordance with USP <797> and FDA Guidance. Each CAPS employee who participates in non-sterile to sterile compounding must complete a bi-annual media-fill validation. Once the solutions are prepared from the raw materials, they are sterilized using a cold filtration process. This means they are passed through a 0.2μm pharmaceutical grade sterilizing filter into the final sterile container within an ISO Class 5 Laminar Airflow Work Station (LAFW). All sterile solutions that are compounded from non-sterile components undergo validation testing before a CAPS facility may use the solution. All sterility and chemical testing procedures are validated and performed according to current USP/NF standards. These sterile filtered solutions are quarantined until quality assurance testing, including sterility testing, is complete as required by CAPS Standard Operating Procedures and USP <797>.

The following quality assurance tests are completed for each batch solution compounded from non-sterile powders: mixing vessel/liner integrity testing, filter integrity testing (Bubble Point Test), yield verification, label ID verification, visual appearance, LAL (Endotoxin testing per USP/NF), USP <71> sterility testing using membrane filtration method or Rapid Sterility Method using an FDA Approved BacT Alert System, particulate matter test (per current USP/NF HIAC), chemical identifications, pH, and concentration per USP.

Each batch is reviewed by a Registered Pharmacist and the on-site independent Quality Assurance personnel. No lot may be released for use unless all tests performed return results within specifications and the on-site independent Quality Assurance personnel has authorized the batch for release.

The rigorous CAPS Quality Assurance program is designed to provide CSPs of the highest quality. The program provides a framework for integrating measurement, audit, evaluation and improvement systems. These systems are governed by a strict set of standard operating procedures (SOPs) that are supported by didactic learning modules and skill based training.
CAPS categorizes all finished CSPs sold to its customers as either low or medium-risk CSPs. CAPS’ aseptic process and individual media fill verifications routinely demonstrate that the compounding staff, equipment, and environment used in the CAPS compounding processes are capable of maintaining the appropriate level of sterility assurance during the performance of low and medium-risk aseptic processing. Three media fill verification runs are performed initially to evaluate each process and individual. These low and medium risk processes are validated at least twice a year using a media fill process validation in accordance with USP <797> and FDA Guidance. Each CAPS employee who participates in this compounding process must complete an annual media fill validation, at minimum.

Staff and facility performance are measured and evaluated on a continuous basis. CAPS admixes CSPs in ISO Class 5 LAFWs within ISO Class 7 buffer rooms adjacent to ISO Class 8 anterooms. Cleanroom temperature, humidity, and air exchanges are continuously controlled and maintained. CAPS’ comprehensive environmental cleanroom and employee monitoring programs are designed to ensure that preparations are compounded in an environment that minimizes the potential for the introduction of microbial contamination. The battery of tests in these programs include: weekly dynamic (viable) gloved fingertip bioburden testing, weekly dynamic (viable) sterile sleeve cover bioburden testing, weekly dynamic (viable) air bioburden testing, weekly dynamic (non-viable) particulate matter air counts, and weekly dynamic (viable) surface bioburden testing.

For CSPs labeled with extended beyond use dating, sterility testing using USP <71> membrane filtration method or FDA approved BacT Alert Rapid Sterility System, is conducted daily for each ISO 5 work bench for each low or medium-risk compounding process used. Sterility test method (Bacteriostasis & Fungistasis) validation has been conducted using 100% of the USP <71> challenge organisms, and other environmental isolates. Challenge organisms include gram positive cocci, gram negative bacilli, spore-forming organisms, anaerobic bacteria, yeast, and mold. The sterility testing method is designed and demonstrated through validation to detect the entire spectrum of microorganisms, including Aspergillus and Exserohilum species.

For all container systems, Container Closure Integrity (CCI) validation is performed to demonstrate that both the container and closure maintain sterility throughout the shelf life of the preparation. Containers such as IVPBs, syringes, and elastomeric devices are first filled with a sterile growth media with simulation of worst-case, post-aseptic-fill manipulations and delivery process conditions. The test samples are then subjected to a severe microbial aerosol challenge (≥1 x 10⁶ cfu/mL) for a specified amount of time. Containers are removed from the challenge, rinsed, incubated, and then examined for growth. A successful CCI test shows that the container maintains the sterility of the preparation throughout the duration of its labeled shelf life.

CAPS’ beyond use dating is based on published pharmacy references, guidelines from manufacturers of FDA approved drugs, pharmacy research literature, or stability extension studies performed by CAPS. All CAPS stability extension studies are performed using only validated stability indicating methods (as opposed to simple potency testing). The combination of the CAPS daily process sterility testing, stability extension studies, container closure integrity testing, extensive individual and process media fill verifications, comprehensive cleanroom and employee environmental monitoring, and enhanced process controls described above, provide the foundation for the CAPS continuous quality assessment and improvement program.

In summary, CAPS will continue to offer the highest quality admixture service to our customers and to their patients. If you would like to receive additional information regarding our quality processes or need other assistance of any kind, please contact CAPS at (800) 853-6498.

Best regards,

Michael A. Koch, R.Ph., MBA
Vice President, Marketing and Support Services