



Drug Supply Chain Security Act (DSCSA) Webinar Q&A

How much does the InfiniTrak subscription cost?

The RedSail price for the InfiniTrak services is \$50/month/location for the non-integrated product. The integrated solution will be \$75/month/location and will be available in the fall. Customers wanting the integrated product can sign up for the non-integrated product now and switch to the integrated solution once it is available.

Who will be enforcing DSCSA?

DSCSA will largely be enforced by the state Boards of Pharmacy with the FDA playing a smaller role in enforcement.

How do I enroll with InfiniTrak?

To get started with InfiniTrak, please use the following link: <https://infinitrak.us/dscsa-compliance-solution-for-redsail/>. You will need to complete the registration for each of your pharmacy locations, and you will be billed for the monthly InfiniTrak service via your monthly RedSail or PioneerRx invoice. You can also visit the website above to see a demo video for InfiniTrak. If you do not use the above link to sign up, you may not see the RedSail contracted pricing.

Does the EPCIS file replace our EDI files?

No. The EPCIS file will contain the data required for electronic interoperability as outlined by DSCSA. This will not replace EDI files that are transmitted to your pharmacy management software.

What if we purchase from a manufacturer or wholesaler that does not transmit EDI files electronically?

Manufacturers and wholesalers that do not transmit EDI files electronically will be required to transmit EPCIS files electronically to comply with DSCSA.

Are OTC products exempt from DSCSA?

Yes – DSCSA only applies to prescription drug products.

What is the website for acquiring a GLN if our pharmacy does not have one?

[GLN Registration Website](#)

What does it mean to choose the “integrated” option?

While customers of all RedSail products are eligible for the discounted price offered through the RedSail/InfiniTrak partnership, only PioneerRx and Axys will offer an integration between InfiniTrak and the software management systems. The integration will allow users to complete most actions (scanning inventory via 2D barcode into the

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pharmacy management system, receiving notifications about suspect products, etc.) within the pharmacy management system without having to visit InfiniTrak's website/portal. Customers who are unable to choose the integrated product (PrimeCare and NRx users) will be able to receive the same discount and the same InfiniTrak services through the InfiniTrak website/portal.

When will the integration be completed?

We expect the integration between InfiniTrak and PioneerRx to be complete in the early fall, and customers who would like to take advantage of the integration can sign up for the non-integrated subscription at this time and switch to the integrated option when it is available.

Does the next implementation phase of DSCSA require tracing down to the patient level?

No. The next phase of implementation requires electronic tracing down to the dispenser (pharmacy) level but does not require electronic tracing to the patient level.

Do I still need to trace products electronically and store the data if I am only ordering from one wholesaler?

Yes – even if you are only ordering from one wholesaler, you must comply with the requirements of DSCSA.

What information is contained in the 2D barcode?

The 2D barcode contains the following information: NDC, serial number, lot number, and expiration date.

How do I order a 2D barcode scanner?

Please submit a support request via your normal hardware request process for additional information on purchasing 2D barcode scanners.

How will my pharmacy workflow need to change to comply with the next phase of DSCSA?

Once the next phase of the DSCSA rolls out on November 27, 2023, electronic product verification will be required. To ensure you meet this requirement, your processes must include confirming the validity/accuracy of the product tracing data you receive as it compares to the physical product you receive. Best practices will be that each individual product be scanned with a 2D barcode scanner at the time it is received in the pharmacy and before it is integrated into the pharmacy's physical inventory.

For customers who choose our integrated solution, products will be scanned into the inventory in the pharmacy management software, and the barcode information will be transmitted to InfiniTrak. For customers choosing the non-integrated solution, products will need to be scanned directly into the InfiniTrak website/portal.

To comply with the law, you will not necessarily need to scan the 2D barcode at the time of dispensing, but pharmacies may choose to scan the drug at that point in the workflow process. While you may choose to scan the product at the time of dispensing, scanning the product for dispensing will not replace the requirement to scan each product into your

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pharmacy management system or into the InfiniTrak website to verify the product against the EPCIS file when it is initially received in inventory.

Receiving inventory by EDI will not replace the need to scan each individual product into the pharmacy management system (for integrated users) or into InfiniTrak's system (for non-integrated users).

With multiple stores and common ownership under 50%, how will this impact us with inter-store transfers?

Commonly held stores are typically defined as 100% owners of the same store, so you would be required to track the orders between stores.

Do you have any guidance about transferring drugs from a pharmacy to a medical provider?

Health practitioners are exempt from the law as long as they are not defined as large facilities. The pharmacy needs to create the transaction and have the data available for the health practitioner if they request it.

How does it work for pharmacy-to-pharmacy product sales that are not patient-specific?

The InfiniTrak platform has a New Transaction tool that allows the pharmacy to create the TG# data required to be sent to the pharmacy in the transaction, and the T3 data is sent as a flat file in an email.

That explains common ownership. How about if you are getting the drug from a pharmacy not under your ownership?

You must track the T3 data.

How are drugs transferred between individual pharmacies handled?

The InfiniTrak platform has a New Transaction tool on the platform that allows pharmacists to create the required T3 data and send it with the product to the store.

If a pharmacy supplies a doctor's office or clinic, what is the requirement for the pharmacy?

The pharmacy must make the data available to the doctor's office.

What if you are transferring drugs between pharmacies (same ownership)?

Tracking is exempt between pharmacies under common ownership.

We borrow back and forth from our neighbor pharmacies. Will this mess us up?

You will need to track these transactions. InfiniTrak has a tool to help you track them.

Where do I find answers to questions specific to individual pharmacy management

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systems?

For answers to questions about a specific pharmacy management system (PioneerRx, Axys, PrimeCare, NRx), users should submit a support request through their normal support request process.

How do I access the DSCSA webinar recording?

The recent DSCSA webinar is now available to watch online. Please select from one of the following destinations below based upon your pharmacy management system:

PioneerRx customers can find the webinar on PioneerRx University linked here [here](#) in the DSCSA course material.

Axys, PrimeCare, and NRx customers can find the webinar on the RedSail Hub linked directly [here](#) (video is located under Webinars and Presentations > Industry News & Impacts). Not yet registered for the Hub? Sign up [here](#).