Customer FAQs – Drug Supply Chain Security Act (DSCSA) - Unit of Measure Impact

DUE TO UPCOMING DEADLINES ASSOCIATED WITH THE DRUG SUPPLY CHAIN SECURITY ACT (DSCSA), THE UNITS OF MEASURE YOU HAVE GROWN ACCUSTOMED TO PURCHASING MAY NO LONGER BE AVAILABLE FOR SALE.

Q: What are the upcoming DSCSA deadlines?
A: On November 27, 2019, wholesalers like Emergency Medical Products can only buy and sell products that are serialized at every unit of sale and affixed with a product identifier that complies with the DSCSA.

In anticipation of the November deadline set by the DSCSA, Pfizer is requiring early adoption of the selling UOM for their products. Pfizer’s requirement is to ensure its distribution partners address any compliance concerns in advance of the official FDA deadline.

Q: How do these deadlines affect my business?
A: You will no longer be able to buy individual units of use such as vials or bottles, or by the each, as you might have done in the past. The deadlines require pharmaceutical products subject to DSCSA to be affixed with a product identifier at every unit of sale. Manufacturers like Pfizer determine what constitutes a unit of a sale. Unfortunately, in most instances, manufacturers do not consider a unit of sale anything less than a box. This means all units of use contained within a box are not affixed with a complete product identifier and are therefore not able to be sold individually according to the DSCSA. As a result, EMP and other distributors, in most instances, are no longer able to offer for sale individual units of use such as vials or bottles.

Q: Why is compliance to DSCSA requirements important?
A: Failure to comply with DSCSA requirements is prohibited and may result in civil and criminal penalties, injunction of unlawful activity and seizure of goods. In addition, individual state penalties may apply.

Q: Can I buy other items by the each unit of measure from companies other than Pfizer, up until the national deadline of November 27, 2019?
A: At this time, yes, you can still buy non-Pfizer brand pharmaceuticals at an each unit of measure from EMP. We have created a list of the Pfizer products that we carry, with a cross-reference to other brands where applicable. Please refer to the list of impacted items and equivalent products from other manufacturers.

Q: What happens if I have a backorder?
A: Your order will remain in our system and will be fulfilled when inventory is available.

Q: How do I know which Pfizer products are impacted?
A: Please refer to the list of impacted items and equivalent products from other manufacturers.

Q: Which IMS International and Pfizer items are increasing in price?
A: Most Pfizer and IMS International products are receiving a price increase. Please consult your Account Manager or call Customer Service for pricing.