Partnership for DSCSA Governance (PDG) Pilot Tabletop and Workshop Report

On June 15th and 16th, the Partnership for DSCSA Governance (PDG) hosted a two-day pilot tabletop workshop (the "Workshop") for industry participants and federal and state regulators to work through simulated scenarios related to the DSCSA requirements for 2023. This report summarizes the Workshop and captures conclusions and action items for participants.

Contents

PDG Overview

PDG is an independent, balanced, sector-neutral nonprofit industry governance body that supports the secure, electronic, interoperable tracing, and verification of prescription drugs in the U.S. supply chain, as required by the Drug Supply Chain Security Act (DSCSA).

PDG membership includes leading authorized manufacturers, repackagers, wholesalers, third-party logistics providers, and dispensers (hospitals and retail and independent pharmacies), as well as leading industry trade associations and technical experts. Together, these members are working to establish a comprehensive vision for industry's implementation of secure, electronic systems and processes for drug traceability in the United States.

For additional information, visit www.DSCSAgovernance.org.

Executive Summary

Pharmaceutical supply chain industry participants and federal and state regulators came together to explore PDG's work thus far in establishing a system of governance for DSCSA compliance. Participants worked through multiple scenarios and use cases on TI exchange, tracing, verification, credentialing, and suspect and illegitimate product investigations. Through the different exercises and discussions, participants found that (1) DSCSA compliance requires extensive coordination between trading partners and utilization of both human and technology resources, (2) compliance requires effective management of large volumes of data, and (3) while DSCSA regulations are one factor in securing the US pharmaceutical supply chain, it is not the only factor. At the conclusion of the Workshop, participants identified areas of remaining work, including a need for increased collaboration between industry and federal and state regulators, determination of best practices to fill identified gaps, and continued discussions to identify issues that necessitate clarification, consideration, and resolution.

Background

Title II of the Drug Supply Chain Security Act of 2013 (DSCSA) requires coordination among pharmaceutical supply chain trading partners to create an interoperable system to exchange and use transaction data. While some DSCSA requirements are already in effect, a set of enhanced drug distribution security requirements take effect on November 27, 2023. To assist industry in meeting these requirements, PDG designed the Workshop to test and validate the PDG functional design and specifications for tracing and verification request and response protocols, to facilitate dialogue on use cases, and to identify remaining gaps and challenges for industry, FDA, and states.

In January 2022, the National Association of Boards of Pharmacy (NABP) launched a pilot project that engaged state regulators and industry participants to identify remaining gaps in achieving DSCSA compliance. Through the exploration of multiple use cases and leveraging PDG work to date on a tracing request-response protocol, the NABP found that there was a need for clarification for state regulators, training to understand DSCSA compliance requirements, improvements to tracing request and response templates, and other general improvements to aide trading partners. NABP recommended some of the identified gaps to PDG to address, and the PDG Workshop was designed to help close those gaps and find solutions.

A full participant list may be found in Appendix A.

Goals of the Workshop

The primary goal of the Workshop was to test and validate the functional design and specifications of the PDG Blueprint, which includes a request and response protocol for tracing, verification, and credentialing. The format of the PDG Workshop facilitated dialogue on the enhanced interoperable network among participants who represented industry, FDA, and state boards of pharmacy. Following from the NABP Pilot, the PDG Workshop sought to identify remaining gaps in DSCSA compliance and to close previously identified gaps. Another goal of the Workshop was for the participants to model and evaluate FDA-ATP interactions within the enhanced network through multiple use cases looking at how the components are used within an investigation or recall.

Use Cases

Two types of exercises were used to work through various pre-defined use cases. The first type of exercise was a roleplay of the enhanced network *process* aimed at helping participants visualize the processes for TI exchange, verification, and tracing. In this exercise, a selected group of 10 participants were assigned to the various supply chain roles (manufacturer, wholesaler, dispenser) as well as the FDA and a State Board of Pharmacy.

In the second type of exercise, participants use simulated DSCSA data and systems to explore various use cases. During these exercises, each table of at least six Workshop participants were assigned to the roles manufacturer, wholesaler, dispenser, State Board of Pharmacy, or FDA.

Each table was asked to use an online worksheet created in advance with extensive simulated data. Examples of the data used in these simulations are included in Appendix B. Participants used this simulated data to simulate and discuss their processes and decisions in the context of the following: (1) verification request, (2) verification response, (3) TI document, (4) tracing request, (5) tracing response, (6) filing of Form 3911.

Suspect and Illegitimate Product

USE CASE 1:

> *Scenario 1: On November 24, 2024, Wholesaler 1 is delivering a mixed tote to Dispenser 1. During the last mile of the delivery, the delivery vehicle is robbed, and the tote is stolen.*
>
> *Scenario 2: On December 14, 2024, Wholesaler 2 delivers a tote with 18 packages of the drug Ziptozane to Dispenser 2. The pharmacist at Dispenser 2 notices that the TI shows 18 unique product identifiers, but the physical product contains 6 packages with identical product identifiers.*
>
> *Scenario 3: On January 7, 2025, Manufacturer 1 received a complaint from a patient who purchased a product at Dispenser 3 and claims the product has not worked and the color of the package was different from other packages of the same product. The patient provided Manufacturer 1 with the lot number, SN, GTIN, and expiration number.*

* * * * *

This use case and its scenarios highlighted the important role of Forms 3911 and related notification requirements in building awareness among trading partners that may be impact by nefarious activity. It also highlighted the importance and role of processes for the identification and investigation of suspect product and created recognition that tracing and verification are only components of those broader processes.

This use case also highlighted the important role serialization plays in robust receiving processes. For example, in the case of Scenario 2, Dispenser 2 was more likely to identify the duplicate serial numbers—which did not match the accompanying TI—by reconciling each physical unit. Even so,

participants noted the difficulty distinguishing a duplicate serial number from multiple observations of the same product; a duplicate could mean the product is being scanned a second time or there is an issue with either the TI or the scanner, among other possible reasons. Regardless of the reason, some participants stated that a non-unique identifier is an illegitimate product and cannot be dispensed.

In Scenario 3, the patient notification to Manufacturer 1 highlighted the challenge that exists when a manufacturer does not have a direct relationship with the dispensers of its products. Verification requests and the ability to provide specific contact information as part of a verification request will help alleviate challenges in such instances. When challenges like this occur and there is an apparent break in the supply chain, multiple trading partners are expected to coordinate the investigation, and easily accessible contact information will facilitate coordination.

Another significant takeaway from this use case was a better understanding of the role Federal and state regulators play in these scenarios. Interestingly, in the exercises, trading partners did not routinely engage the state regulators in their investigations or reporting. The following were noted:

- For situations where product is stolen, the FDA may work with state regulators to determine the scope of data sharing and enforcement.
- Many states have non-DSCSA regulations which require theft and loss be reported to the state.
- When a trading partner sends a Form 3911 to the FDA, they can also consider notifying the state regulators. There will likely be some duplicate work between states and FDA, but notifications to the state regulators early on can help prevent some duplication and allow the FDA and states to work together.

Suspicious Labeling

USE CASE 2:

> *During this simulation, trading partners were operating in the ordinary course of business when wholesalers and dispensers identified labels on products that were inaccurate in a way that caused the product to be suspect.*

* * * * *

The trading partners that discovered the suspicious labels must leverage their broader suspect product investigation processes to determine whether the product is legitimate, suspect, or illegitimate and to quarantine the product during the investigation. Many participants initiated a PI verification request to the manufacturer as it is a required step in a suspect product investigation. Manufacturers then compared the labels to their commissioning files and communicated a response to the requesting trading partner.

This process highlighted the fact that a response to a verification request carrying the reason of “suspect and illegitimate” should lead to a broader conversation between the trading partners, but what the process for engaging looks like will be a business decision. Providing a phone number, email address, or other contact information in either a request or response can allow for a much quicker connection and discussion on what the problem is and how to resolve it.

pdg Partnership for DSCSA Governance

Class I Recall

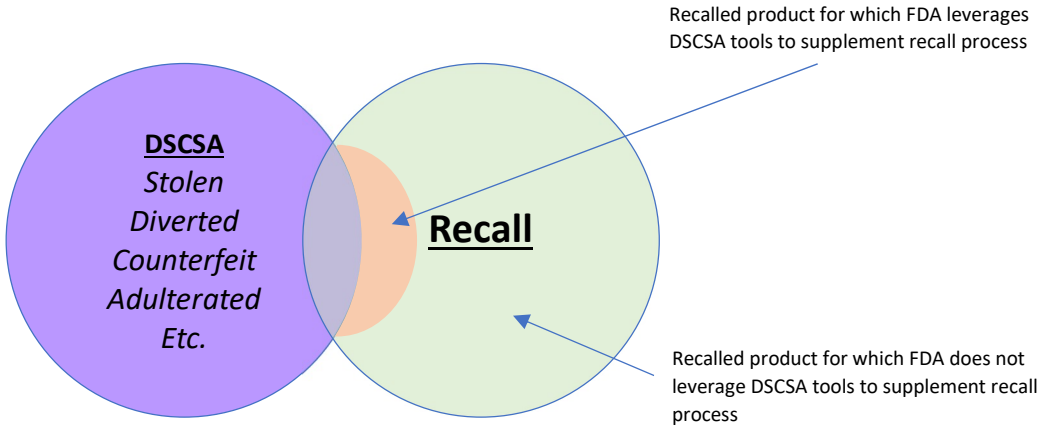
USE CASE 3:

> *A manufacturer has voluntarily initiated a Class 1 recall for a specific lot number of a product. FDA has requested the relevant product tracing information from the trading partners regarding the recalled product.*

* * * * *

This use case highlighted the difficulty industry is facing in understanding the anticipated scope and applicability of verification and tracing systems as part of the standard recall process. This is particularly true because the statute only authorizes regulators (not trading partners) to initiate the tracing process on account of a recall. Within PDG, most trading partners have assumed that FDA will leverage the tools of verification and tracing to supplement certain types of recalls but will not use those tools as part of *all* recalls. Understanding the anticipated volumes—represented by the orange component in the graphic below—in these cases is critical to help design and construct the appropriate system capacity.

The severity of a Class 1 recall generated discussion about the potential value (or lack thereof) that tracing brings to the recall process. Most importantly, it highlighted the challenge associated with the large volumes of tracing when attempting to trace every package included in a recall. As demonstrated, this led to thousands upon thousands of trace requests that implicate hundreds of trading partners, making any one piece of data from that process nearly valueless. Most challenging is the fact that some unknown volume of product will have already exited the supply chain (e.g., been dispensed), resulting in thousands of open tracing requests where it is impossible to know whether the product at issue is still in the supply chain. This process also highlighted the challenge that DSCSA tracing provides product ownership information but not possession or location information, and ownership and possession often diverge in our complex supply chain.



Data Simulation of Targeted Recall

USE CASE 4:

> *One manufacturer learned that a case of cold-chain product has been diverted and is recalled by the manufacturer. Through scanning serial numbers, trading partners have discovered that one package from this case has re-entered the supply chain. FDA requests the relevant product tracing information from the trading partners regarding the recalled product.*

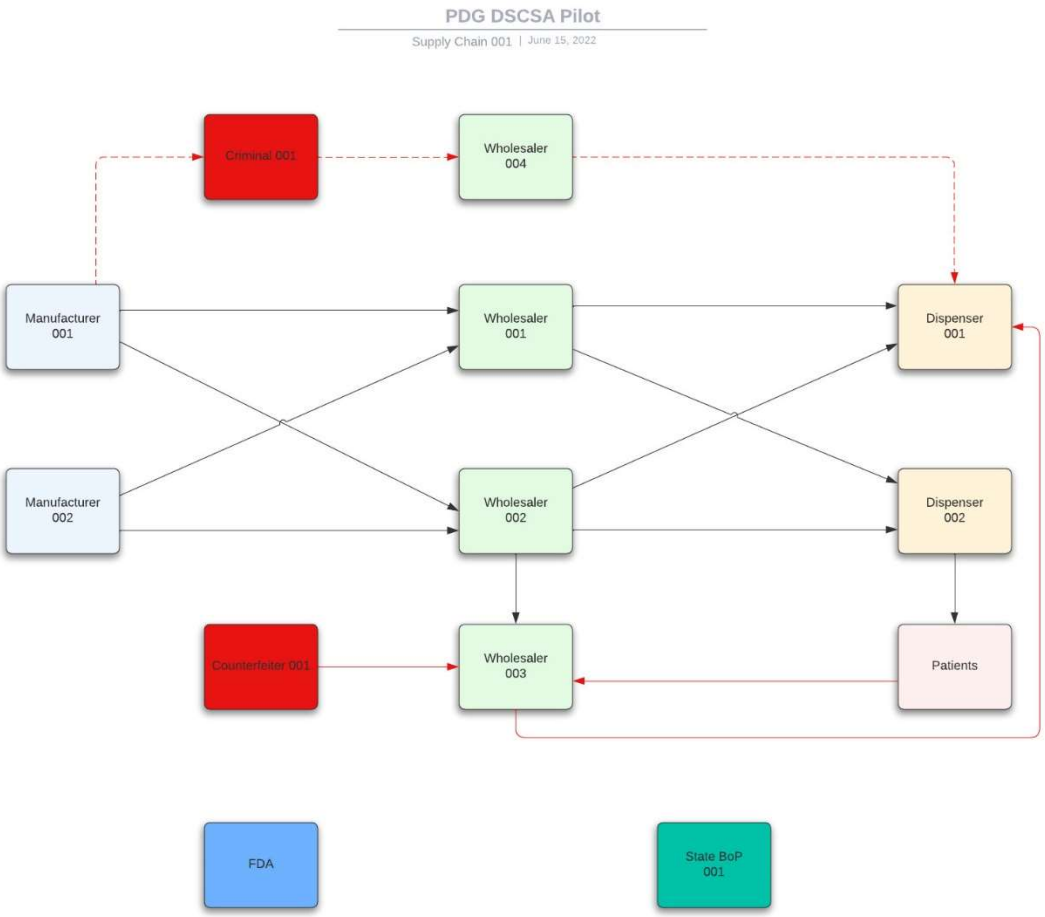
* * * * *

This discussion highlighted the challenge and potential benefit of industry alert capabilities. Conceptually, it was recognized that if one of the diverted serial numbers has reentered the supply chain, others may soon follow, but there was much debate about whether or how trading partners could be notified of this risk outside of today's recall processes. Participants highlighted the importance of continued dialogue on this issue to identify potential value in leveraging DSCSA systems for business value in the recall context and the need for capability to trace individual packages for recall purposes. The latter will mitigate unneeded work on the part of the trading partner and reduce the volume of unnecessary data.

Data Simulation of Counterfeits, Theft, and Diversion

USE CASE 5:

> *Scenario 1: Wholesaler 3 purchases product from Wholesaler 1 and Wholesaler 2, then sells its product to Dispenser 2. Wholesaler 3 purchases product from patients of Dispenser 1 and Dispenser 2 that it sells back into the supply chain.*
>
> *Scenario 2: Wholesaler 3 purchases counterfeits from an illegal source and sells the product into the supply chain.*
>
> *Scenario 3: Criminals stole product from Manufacturer 1, then sells to Wholesaler 4, who sells the product into the legitimate supply chain.*



* * * * *

This use case and its scenarios highlighted the complexity of an investigation when a nefarious actor penetrates the supply chain as well as both the value and limitations of the DSCSA tools for verification and tracing. Once again, the complexity of this intersection between investigation processes and the DSCSA tools of verification and tracing was brought to the forefront, as well as the challenge each company faces in moving from "something is suspicious" to "there is actually a problem" to notification of others that there is a problem. Continued work among trading partners to understand how best to leverage and apply those DSCSA tools will be critical.

Outcomes

Several key themes and conclusions emerged throughout the exercises. Each of these will inform and shape PDG's continued work and ongoing implementation of DSCSA systems and processes.

The Conjunction of Tools and Human Investigation: The DSCSA places great emphasis on the requirement for and role of interoperable data systems. The Workshop experience and discussions, however, continued to emphasize that the electronic interoperable tools established by the DCSSA will

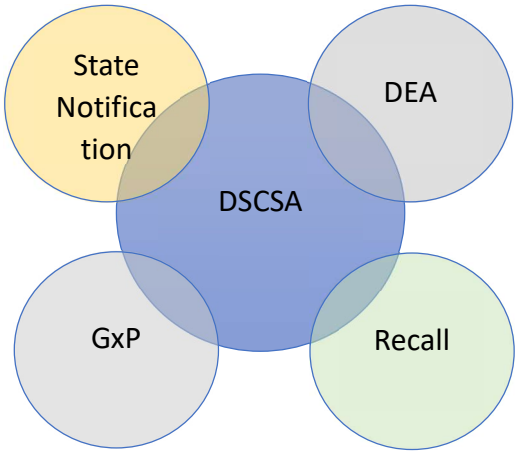
be used within the context of much larger, traditional, human-to-human investigations. This has several key implications.

1. Participants built a greater awareness and understanding of the reality that verification and tracing systems are *tools* that will enhance existing investigation processes; they will not replace those processes. Ultimately, these DSCSA systems will be additional tools in the toolkit used to investigate suspect and illegitimate product.
2. While the notion of interoperable electronic systems often invokes a perception of automation, the reality is these DSCSA processes—especially tracing—will be incorporated into human-to-human investigation processes that move much more slowly than the speed of electronic automation. This has implications for target speeds of the tracing process.
3. Interoperable systems and processes for tracing following a set protocol may often lack the precision or context that may be needed in an investigation. This is not an indictment of standardized protocols—they are essential in an electronic environment—but rather a recognition that clarity or context that is lacking through the protocol can be sought through other follow up and human-to-human interactions. For example, if a trading partner responding to a tracing request does not have information for the SNI at issue but wishes to provide other context about similar transactions (e.g., a transaction on the same date with the same party), that information does not need to be captured within the protocol because it can be provided through other means as part of the investigation.
4. Verification and tracing offer a snapshot in time of a very active supply chain, highlighting the need to develop investigative strategies to detect nefarious activities as early as possible.

Volume of Data: Through the simulated data sets, participants gained a great appreciation for the number of systems and volume of data involved and the complexity of making informed conclusions from that data. While our simulations represented a miniscule portion of the data a trading partner will be responsible for managing given the 6-year data retention requirement in the DSCSA, it still highlighted the difficulty of sifting through that data, across multiple systems, to reach a conclusion.

Scope of Verification Systems: Discussions continued to highlight the significant difference between systems and processes to investigate and verify a product and the narrower electronic process for verification of a product identifier. It is important that stakeholders understand where and how these systems differ and interrelate.

The Breadth of Pharmaceutical Supply Chain Regulations: Numerous Workshop discussions highlighted that the DSCSA is only one piece of the supply chain regulatory landscape, and it overlaps with numerous other regulatory requirements, such as Drug Enforcement Agency (DEA) requirements, the recall process, Good Practice (GxP) requirements, and numerous state laws. This overlap creates challenges, inefficiencies, and ambiguities because the interrelationship of them is unclear. Trading partners would do well to consider how these other requirements might trigger a suspect or illegitimate product investigation that would benefit from information gathered via a verification or tracing request.



Verification Fields: One of the most significant challenges in DSCSA implementation is reaching the appropriate person to engage in DSCSA processes. For example, a dispenser may recognize it needs to engage with a large manufacturer, but finding the right location or person within that manufacturer to engage quickly is difficult. The addition of verification fields to include contact information may serve as a valuable safety valve when dealing with product that has undergone multiple transactions, recalls, or investigations. At a minimum, the trading partner requesting verification through interoperable systems can include contact information for more direct engagement.

Resource Availability: There is great variation among States and regulators of the resources that are available to integrate into a DSCSA system. States have been generally more focused on the compounding requirements of the Drug Quality and Security Act. Each State's Board of Pharmacy will operate and investigate differently. State authorities should be encouraged to assess their resources and capabilities well in advance of November 27, 2023 and communicate their general plans and approaches to avoid a learning curve and enforcement confusion.

Requirements versus Best Practices: Although there are statutory and regulatory data exchange requirements, there are still gaps that must be filled in with industry accepted "best practices," such as how particular content should be communicated. Continued progress and broad adoption is critical.

Industry & Regulator Interactions: The DSCSA requirements will heavily rely on cooperation between industry and both State and Federal regulators. Continued interaction and collaborative planning among industry and regulators will be essential to effective implementation. The pilot required state and federal regulators, industry, and solution providers to solve real issues using the same DSCSA tools. This created a shared understanding of the benefits and limitations of the tools and further developed the participants' appreciation of collaboration

Conclusion & Next Steps

Throughout the Workshop, three major themes emerged: (1) While electronic systems and processes are required and helpful, they will almost always be applied within the context of a broader human-to-human investigation; (2) Because the DSCSA is only one piece of the vast pharmaceutical supply chain regulatory landscape, which includes state notification, DEA, GxP, and recall, understanding the various

regulations and how they fit together will be critical in properly engaging and responding to regulators going forward; and (3) The sheer complexity and volume of gathering and maintaining quality data will require regulatory bodies and industry to interact more closely and intentionally than has previously been done.

The Workshop revealed areas that PDG will continue to explore and address in preparation for a successful November 2023:

1. Collaboration with state regulators and NABP to standardize state regulator roles and resources.
2. Establishment of industry best practices to fill in operational gaps the DSCSA does not directly address.
3. Collaboration with FDA to develop greater specificity regarding the applicability of tracing in recalls.
4. Continued discussion of the processes trading partners may follow and tools available to help them in actual product investigations as they transition from identification of a supply chain ambiguity to a determination of what has likely occurred to how to address it quickly and in full compliance with the DSCSA.
5. Refinement of the PDG Blueprint's functional design.

PDG will continue to discuss, explore, and respond to the various themes and next steps identified during the workshop to continue preparing industry participants and regulators for a successful go-live in November 2023!

pdg Partnership for DSCSA Governance

Appendix A: Participants

Government and Government Representatives

Connie Jung, FDA
Christina Picard, FDA
Patrick Whelan, FDA-OCI
Jenni Wai, OH Board of Pharmacy
Caroline Juran, VA Board of Pharmacy
Deena Speights-Napata, MD Board of Pharmacy
Justin Ortique, D.C. Board of Pharmacy
Mark Karhoff, NABP
Josh Bolin, NABP

Manufacturers

Diane Redler, Bristol Myers Squibb
Barry DeDominicis, Bristol Meyers Squibb
Aladin Alkhawam, Endo Pharmaceutical
Don Wrocklage, Endo Pharmaceutical
Vidya Rajaram, Genentech
Nirmal Annamreddy, Genentech
Mike Mazur, Pfizer
Shivendra Mahendran, Apotex Corp.
Richard Lanier, AbbVie, Inc.
Rathna Arumugam, Gilead Sciences
Lee Murtagh, Harmony Biosciences
Garrick Heidt, Harmony Biosciences
April Sese, Johnson & Johnson
Tristan Ault, Johnson & Johnson
Peter Colosi, Gilead Sciences

Wholesalers and 3PLs

Matthew Price, Medline Industries LP
Eduardo Cedeno, Hercules Pharmaceuticals, Inc.
Jake Beck, Reliance Wholesale, Inc.
Gerard Sartori, Inmar Intelligence
Eddie Shey, Inmar Intelligence
Jeffery Denton, Amerisourcebergen
Cathy Marcum, Amerisourcebergen
Maryann Nelson, Cardinal Health
Scott Mooney, McKesson Corp
Liz Gallenagh, HDA
Pat McGinn, Eversana

Dispensers

Max Peoples, Uptown Pharmacy / RxScan
David Brown, Walgreens
Melva Chavoya, Walgreens
Christian Nygaard, Avita Health System
Kyle Longo, CVS
Angela Nelson, CVS
Melissa Wilkins, Veterans Affairs
Marian Daum, Veterans Affairs
Adnan Raza, Acaria Health

Technology Providers

Greg Makin, Two Labs
Anil Kumar Suresh, SAP
Elizabeth Waldorf, TraceLink
Ben Taylor, LedgerDomain
Georg Jurgens, Spherity
Michael Palage, InfoNetworks
David Kessler, Legisym, LLC
Octavio Rodriguez, Systech
Christopher Stickel, Excellis Health Solution
Herb Wong, rfxcel
Mark Tate, InfiniTrack
Lloyd Mager, .med
Michael Keech, IQVIA
Andrew Meyer, GS1 US

Appendix B: Sample Simulation Data

Scenario Brief

	A	B	C
1	pdg Partnership for DSCSA Governance		
2	**PDG DSCSA Pilot**		
3	*Scenario 001 - Run 001*		
4	**Scenario Brief**		
5	**Title**	**Description**	**Notes**
6	**Scenario Story:**	This is a basic (happy path) scenario where two manufacturers produces and serializes drug packages, packs them into 12 package cases and ships them to two wholesalers. The wholesalers receives the cases, unpacks them, packs packages into totes and ships to the two Dispenser. The dispensers unpacks the totes and places the packages into inventory and dispenses to patients from that inventory.	
7			
8	**Constraints:**	1. This scenario generates TI only (No TS and No aggregation or packing events). 2. Master data (Entity and Product) are repeated for each case and package.	
9			
10	**Participants**	**Activities**	
11	Manufacturer 001:	1. Create Packages & assign Product Identifier. 2. Create Case & assign Product Identifier. 3. Pack 12 Packages per Case. 6. Ship Cases to Wholesaler. 4. Archive TI/TS internally 5. Send TI/TS to Wholesaler.	
12	Manufacturer 002:	1. Create Packages & assign Product Identifier. 2. Create Case & assign Product Identifier. 3. Pack 12 Packages per Case. 6. Ship Cases to Wholesaler. 4. Archive TI/TS internally 5. Send TI/TS to Wholesaler.	
13	Wholesaler 001:	1. Archive Manufacturer's TI/TS 1. Unpack Cases 2. Place Packages in Inventory. 3. Pack 5 Packages per Tote. 4. Archive TI/TS internally 5. Send TI/TS to Dispenser. 6. Ship Totes to Dispenser.	Wholesaler reconciles Packages on hand to Manufacturer's TI/TS on outbound.

Exercises

	A	B	C
1	pdg Partnership for DSCSA Governance		
2	**PDG DSCSA Pilot**		
3	*Scenario 001 - Run 001*		
4	**Exercises**		
5	**Title**	**Description**	**Hints / Tools**
6	**Scenario Objectives**		
7	Product Reconcillation	Make sure you haven't sent TI for packages that you have in inventory.	*Check TI Sent against Current Inventory.*
8	PI Verify	Reply to PI Verifications from others in the supply chain.	*Use the DSCSA Electronic Systems below.*
9	Trace a Package	Initiate TI Requests to trace a package	*Use the DSCSA Electronic Systems below.*
10	Reply to TI Requests	Reply to TI Requests that you receive.	*Check your TI Requests Received often.*
11			
12	**FDA and State BoP Interactions**		
13		Submit a 3911 Form	
14		Email the FDA or State Board of Pharmacy	
15	**SoPs**	**Activities**	
16		Initiate Suspect Product Investigation	
17		Initiate Illegitimate Product Investigation	
18			
19	**Trading Partner Dialog**	**Activities**	
20		Contact my Wholesaler	
21		Contact the Manufacturer	
22		Contact my Regulator (FDA, State Board of Pharmacy, etc.)	
23			
24	**DSCSA Electronic System**	**Activities**	
25		Initiate PI Verification	Verify a product with the Manufacturer
26		Initiate a TI Request (a series of TI Requests = a TI Trace)	Submit a TI Request
27		Initiate a TI Response to a request received	Respond to TI Request

Current Inventory

4	Manufacturer 001 Current Inventory									
5	**Status: Hold, Suspect, Illegitimate and Recalled will show the product in Quarrantine**	**Manufacturer**	**Product Name**	**Package GTIN**	**Package NDC**	**Package Serial Number**	**Case GTIN**	**Case NDC**	**Case Serial Number**	**Lot Number**
6		Manufacturer001	PharmLivy	_00374340987248	7434-0987-24	10369	_10374340987245	7434-0987-24	20036	M001-8
7		Manufacturer001	PharmLivy	_00374340987248	7434-0987-24	10370	_10374340987245	7434-0987-24	20037	M001-8
8		Manufacturer001	PharmLivy	_00374340987248	7434-0987-24	10371	_10374340987245	7434-0987-24	20037	M001-8
9		Manufacturer001	PharmLivy	_00374340987248	7434-0987-24	10372	_10374340987245	7434-0987-24	20037	M001-8

Emails Sent

	A	B	C	D	E
1	**Timestamp**	**From**	**To**	**Subject**	**Message**
2	6/13/2022 3:24:18	Manufacturer001	Wholesaler001	Your TI	Sorry, I just found your TI and will send it this afternoon. Best Regards, Joe

TI Request Received

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	**Respond to Request**	**Timestamp**	**Request ID**	**Entity to request TI from**	**Your Company**	**Requester GLN**	**Contact Information (email or phone #)**	**Is this a test of the TI Tracing System (Trade Partners may redact data and will not initiate their own investigation).**	**Reason for Verification request**	**Suspect Investigation Circumstances**	**3911 Incident Number (for Illegitimate investigations)**	**Recall Depth**	**Which Dataset are you requesting (tracing output type)**	**NDC (10 digit format with dashes, 4-4-2, 5-3-2 or 5-4-1)**
2	https://docs.google.com/forms/	6/14/2022 8:28:06	RC001	Wholesaler001	Manufacturer00	GLN001	555-555-5555	Yes	Suspect Product	The label color is different than usual, faded.			Full transaction I	NDC001

TI Sent

PDG DSCSA Pilot

Manufacturer 001 TI Sent

Sold from GLN	Sold from Proprietary Name	Sold from Address	Sold to GLN	Sold to Proprietary Name	Sold to Address	Ship to GLN
_0037434000017	Manufacturer001	12 State St Summit NJ _08147 US	_0085554000015	Wholesaler001	123 Main St Kearney NJ _08712 US	_0085554000029
_0037434000017	Manufacturer001	12 State St Summit NJ _08147 US	_0085554000015	Wholesaler001	123 Main St Kearney NJ _08712 US	_0085554000029
_0037434000017	Manufacturer001	12 State St Summit NJ _08147 US	_0085554000015	Wholesaler001	123 Main St Kearney NJ _08712 US	_0085554000029

Verifications Received

Respond to a Request	Timestamp	Manufacturer or Repackager	Requester GLN	Contact Information: Email Address	Contact Information: Phone Number	Reason for this PI Verification Request	Do you attest that you have possession or control of the product?	GTIN
https://docs.google.com/forr	6/3/2022 17:05:47	Manufacturer001	_008123456789	rc@c4scs.org	609-947-2720	Suspect or Legitimate Product Investigation	Yes	00312345678909
https://docs.google.com/forr	6/7/2022 10:26:34	Manufacturer001	_0085554000015	rc@c4.org	555-555-5555	Suspect or Legitimate Product Investigation	Yes	12345
https://docs.google.com/forr	6/7/2022 11:43:47	Manufacturer001	_0085554000015	rc@c4.org	555-555-5555	Suspect or Legitimate Product Investigation	Yes	_00374340987248
https://docs.google.com/forr	6/7/2022 14:15:38	Manufacturer001	_0085554000015	rc@c4.org	555-555-5555	Suspect or Legitimate Product Investigation	Yes	_00374340987248