INVESTIGATOR INSIGHTS

- Gina Brackett
- Benjamin Dastoli
- Laureen Geniusz
- Phil Pontikos

OBJECTIVE

- Categorize and address questions submitted by attendees
- Approximately 25 questions received
- Investigator insight: Issues we may have seen over the past year. Incorporated into presentation

Topics of Discussion

- General Questions
- Common supplier issues
- Contract manufacturers
- Complaints/MDRs
- 510(k) clearance
- Export Certificates
- Importing Investigational Devices
- IVD inspections
- Interstate documentation

Topics of Discussion

- Warning Letters
- Photographs
- Electronic records
- Guidance documents
- Device Enhancements
- Environmental Controls
- Risk Management
- Statistical Analysis
- Questions

General Inspection Questions

- Prepping for an FDA inspection
- Accommodations for the inspectional team / Investigator
- Records, how long is too long?
- What records are public record?
  Governed by freedom of information act (FOI).

Common Supplier Issues

- How does FDA assess supplier quality?

  Inspectional approach: ASL, SOP, supplier files, quality data (oversight)

- Define, determine, document critical suppliers

  Off the shelf parts? (could be critical)

  Should link to design! (CTQ parts/elements/specifications/processes) require Engineering input)

- Type and extent of control over suppliers defined (risk based)

Common Supplier Issues

- Identify what processes are required to manufacture supplied parts
  - Such as ensuring suppliers have performed adequate/appropriate validation studies
  - Appropriate monitoring of the production processes
  - Who is inspecting the CTQ attributes? Don't assume that all specifications are tested/inspected by supplier.
- Methods for documenting oversight, i.e. scorecards (visible outside of mgmt rev.)
- Preamble – discusses FDAs interpretation of regulation

Contract Manufacturers

- Approach to inspection?
  - Requirements for contract manufacturing and process validations
  - Risk management
  - Recall actions
- Contractual agreements
- Registration and Listing
- Complaint Handling

Complaints/MDRs

- "Examples of best practices seen in inspections?"
  - SOP - complete, customized to your operation
  - Organized files – all related records referenced in file (i.e.: CAPA, NCR, Investigations, e-mails)
  - Clear/concise documentation - Need event details. Initial contact is the best time to obtain
  - Linkage to risk management - New risk? Change in the severity or occurrence rate?
  - Consideration of 21 CFR 806

Complaints/MDRs

- "Complaint = CAPA"….when?
  - Should be defined procedurally
  - CAPAs should be significant actions, typically not all complaints = CAPA
  - Identified through data analyses, risk based
- Service/repair vs complaints; (820.200 vs 820.198)
  - Expected failures - derived from design
  - Translated into procedures
  - Service reports can escalate to a complaint
- Electronic MDRs
- MDRs occurring OUS?

510(k) clearance

- Inspectional Coverage
  - Product is cleared but not marketed, what are the QS responsibilities?
  - Look at design changes for potential new / amended 510(k)s – decision trees helpful

Export Certificates and FDA Inspections

- Certificate to Foreign Government – legally marketed devices
- Certificate of Exportability (COE) for not approved or cleared Class I and II devices under section 801(e)(1)
- Certificate of Exportability (COE) for unapproved devices that require a PMA (Class III), devices required to meet performance standards and banned devices under section 802

Exports

- Obtaining Export Certificates
  - CDRH Export Certification and Tracking System (CECATS) http://www.fda.gov/medicaldevices/deviceregulationandguidance/importingandexportingdevices/ucm329896.htm
  - Guidance http://www.fda.gov/RegulatoryInformation/Guidances/ucm122048.htm

Importing Investigation Devices

- An approved Investigational Device Exemptions (IDE) for significant risk devices
- An investigational plan approved by an institutional review board (IRB) for non-significant risk devices

IVD Inspections

- Coverage of IVDs. What areas are focused on? Unique requirements such as labeling, micro, packaging, expiration dating.

Interstate Documentation

- Records collected:
  - Invoices, Bill of lading, labeling, shipping records, Freight bills, DHRs
- Affidavits
- Component vs finished device (301a 301k)

Warning Letters

- If violative, sent to the Compliance Branch for review.
- Compliance Officer reviews EIR, FDA-483, EIR Attachments and Exhibits, and firm's response, if there is one.
- Determines if the violations meet Situation I in Compliance Program and recommends action (7382.845 Part V)

Situation I

- “Documented evidence indicating that one or more **major deficiencies** with the Quality System regulation have resulted in the inspection being classified as Official Action Indicated (OAI)”

- Examples

Warning Letters

- Direct Reference Warning Letter for 21 CFR Part 820 violations
- CDRH Office of Compliance concurrence with Warning Letter for labeling, premarket, MDR, and Correction and Removal violations

Photographs

- FDA policy/authority
- Cases

Electronic records

- Review of paper verses electronic records during inspections.
- Analyses, data sorts

Guidance documents

- Compliance Programs
- Applicable guidance used
  - Industry standards
  - Specific FDA Guidance documents

Device Enhancements

- Most recent guidance
- Software upgrades/enhancement
- Hazard analyses of software

Environmental Controls

- Endotoxin testing
- Environmental testing
- Alert/Action levels
- Clean room vs Controlled environment

Risk Management

- Incorporating post market data!!!!!!!
- Adequately defining your variables in FMEA's (i.e. severity, frequency)
- Consistency in ranking. (i.e. misdiagnosis, medium then high severity)

Risk Management

- Severity of a potential hazard does not change post mitigation but rather the occurrence. Exceptions: design changes or hazard has been eliminated

Statistical Analyses

- Are you using the correct (appropriate) method?
- Referenced in the QSRs, i.e. 820.100 (CAPA), 820.200 (service)

Questions