Auditing Trends for The New cGMP Initiatives

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Presentation Objectives

- To provide the top 10 trends in auditing for the new cGMP Initiatives from 2003
- To share a process for auditing
- To share a model for auditing
- To make the complex simple

Learning Objectives

- Understand how the auditing trends impact the quality, cost and timeliness of cGMP compliance
- Understand how management controls can enhance the quality, cost and timeliness of audits
- Complete a regulatory training requirement

The Top 10 Auditing Trends

1. Quality Systems Audits
2. Risk Based Audits
3. Auditor Certification
4. Strategic Auditing
5. Ethical Auditing
6. Gorilla Auditing
7. Recreational Auditing
8. Saks 5th Avenue Auditing
9. Creative Auditing
10. Alfred E. Neumann Auditing

Quality Systems Audits

- Quality System Review
- Sub-system Review
- Team Approach

Risk Based Auditing

- Health of the Patient first priority
- Health of the Organization
- Health of the Stakeholders

Auditor Certification

- Experience
- Knowledge
- Education

Strategic Auditing

- One, Three and Five Year Plans
- Auditor as Leader
- Performance Management

Ethical Auditing

- Protecting the Public Trust
- Values Centered
- Outcomes Focused

Gorilla Auditing

- Ego Driven
- Wants Focused
- Gratification Oriented

Recreational Auditing

- Something to do
- Competition focused
- Win oriented

Saks 5th Avenue Auditing

- No limits
- No boundaries
- No constraints

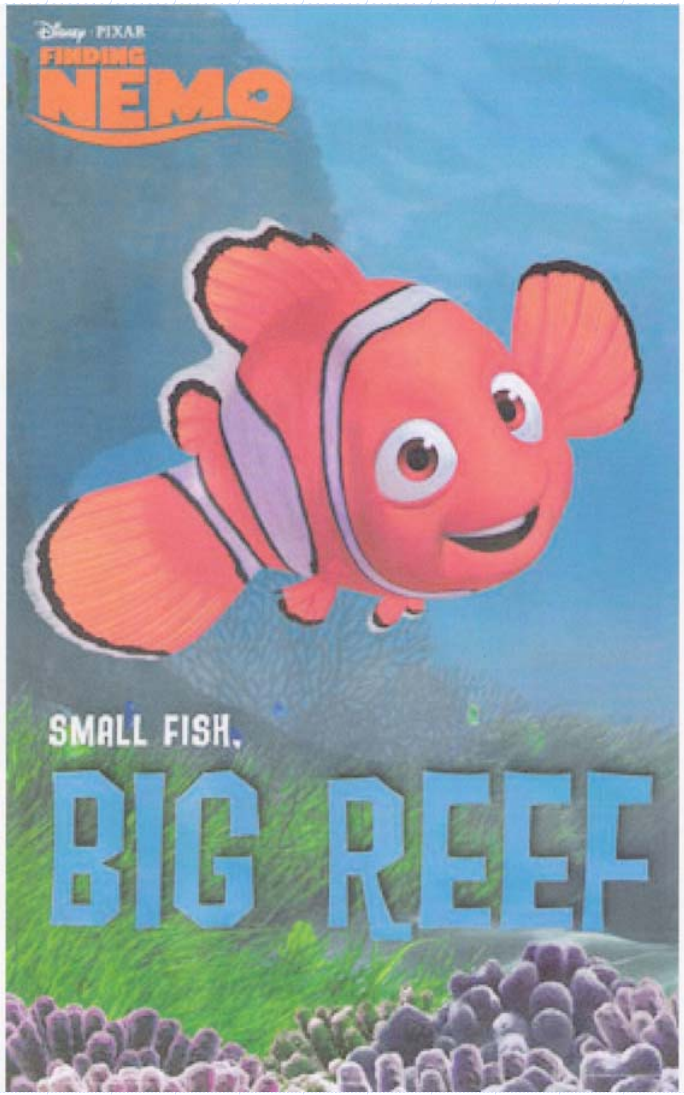
Creative Auditing

- No plan
- No process
- No objectives

Alfred E. Neumann Auditing

- Clueless
- Linear
- Blissful

WHAT TO DO?



FDA Organization

Major FDA Areas

CDER
Center for Drug Evaluation and Review

CVM
Center for Veterinary Medicine

CBER
Center for Biologics Evaluation and Review

CDRH
Center for Device and Radiological Health

Types of FDA Inspections

- Pre-Approval Inspections
- Statutory Inspections
- Issue Follow-up

Pre-Approval Inspections

- Result of a regulatory filing: NDA, ANDA, New Submissions.
- Acceptable Inspection must be obtained prior to approval of application.
- You know it is coming.
- Originally called the “hostage scenario”.

Statutory Inspections

- Required By Law
- Every Two Years
- Specific to Product Class - Tablets, Sterile, Liquids, Cream, Ointment, etc.

Issue Follow-up

- Complaints
- Warning Letters
- Field Concerns

How Are They Performed

- Team approach
- Lead Investigator will be designated
- Additional members can be: Investigators, chemists, microbiologists, computer specialists, & engineers.

How the Inspection Progresses

- FD 482
- FD 483 ?
- For a PAI Approval/Non-Approval Indicated.

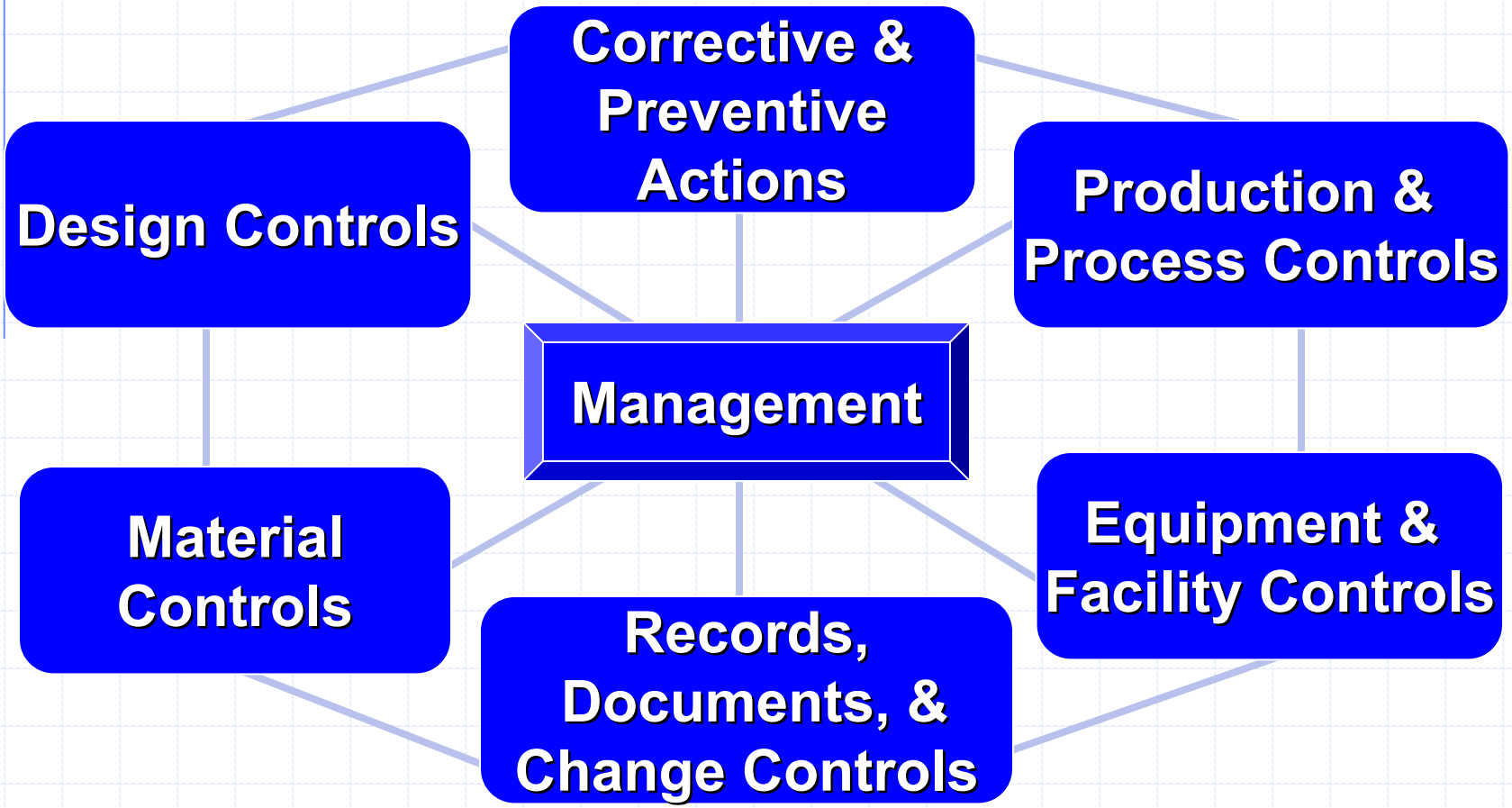
FDA Enforcement Tools

- FD483
- Warning Letters
- Seizure
- Injunction
- Consent Decree
- Criminal Prosecution
- Debarment

An Auditing Model from the FDA

for 2004

Quality System



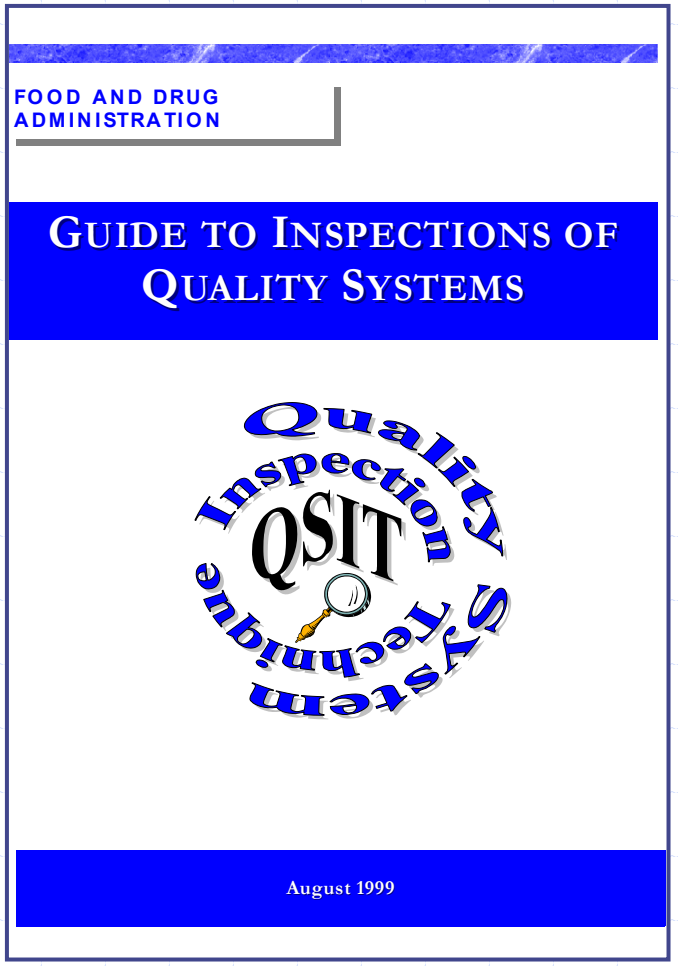
QSIT Progression

1. *Management Controls*
2. Design Controls
3. Corrective and Preventive Actions
4. Production and Process Controls
5. *Management Controls*

How Will Management be Inspected?

- QSIT Guide
  - Purpose and Importance
  - Objectives
  - Flow chart
  - Narratives

Source: www.fda.gov



Assessment

"Top Down" - *Defined and Documented*

1. Quality Policy

    Management Review Procedures

    Quality Audit Procedures

    Quality Plan

    QS Procedures and Instructions

Assessment
"Top Down" - *Implemented*

2. Quality Policy and Objectives
3. Organizational Structure
4. Management Representative
5. Management Reviews
6. Quality Audits

Assessment
"Top Down" *(At Inspection Conclusion)*

7. Quality System Established and Maintained

Quality Policy - 820.3(u)

- The overall intentions and direction of an organization with respect to quality
- As established by management with executive responsibility

Quality System - 820.3(v)

- The organizational structure, responsibilities, procedures, processes, and resources for implementing quality management

FDA's Authority to Hold Management Responsible

- FD&C Act - Section 704(a)(1)
- 21 CFR 820.20
- Case Law - Dotterweich & Park
- FDA will determine authority and responsibility to the highest level of the firm as well as the corporation or organization.

Source: www.fda.gov

Delegation by Management with Executive Responsibility

- Establishment of quality objectives
- Translation of objectives into methods and procedures
- Implementation of quality system

Responsibility of Highest Level of Management

- Establish Quality Policy
- Ensure that it is followed

How to Demonstrate Compliance

- Procedures ...
- Verbal Communications
- Written Records and Documents

Establish [21 CFR 820.3(k)]

- Define
- Document
- Implement

What FDA Evaluates

- Duties
- Responsibilities
- Authorities

Procedures … FDA Looks At

- Quality Policy
- Quality Plan
- Management Review
- Quality Audit
- Quality System Procedures and Instructions

Verbal Communications: FDA "Looks At"

- Management with Executive Responsibility
  - Commitment to Quality
  - Dialogue during "Daily Wrap-ups"
  - Commitment to Correction and Prevention

Verbal Communications: FDA "Looks At"

- Management Representative
  - Interviewed prior to review of each subsystem
  - Provide overview of each subsystem
  - Demonstrate knowledge and understanding of each subsystem
  - Dialogue during "daily wrap-ups"

Verbal Communications: FDA "Looks At"

- Employees
  - Familiar with the Quality Policy
  - Other dialogue

Written Records/ Documents FDA Looks At

- Organizational Structure
- Appointment of Management Representative

Written Records/ Documents FDA Looks At

- Documentation that audits were conducted as scheduled.
- Documentation that management reviews were conducted as scheduled.

FDA Access to Audit and Management Review Reports

- FDA's policy relative to the review of quality audit reports is stated in CPG 7151.02 (CPG Manual subchapter 130.300).
- This policy restricts FDA access to a firm's audit reports.

more...

FDA Access to Audit and Management Review Reports

- Under the Quality System Regulation, this restriction extends to reviews of supplier audit reports and management reviews.

more...

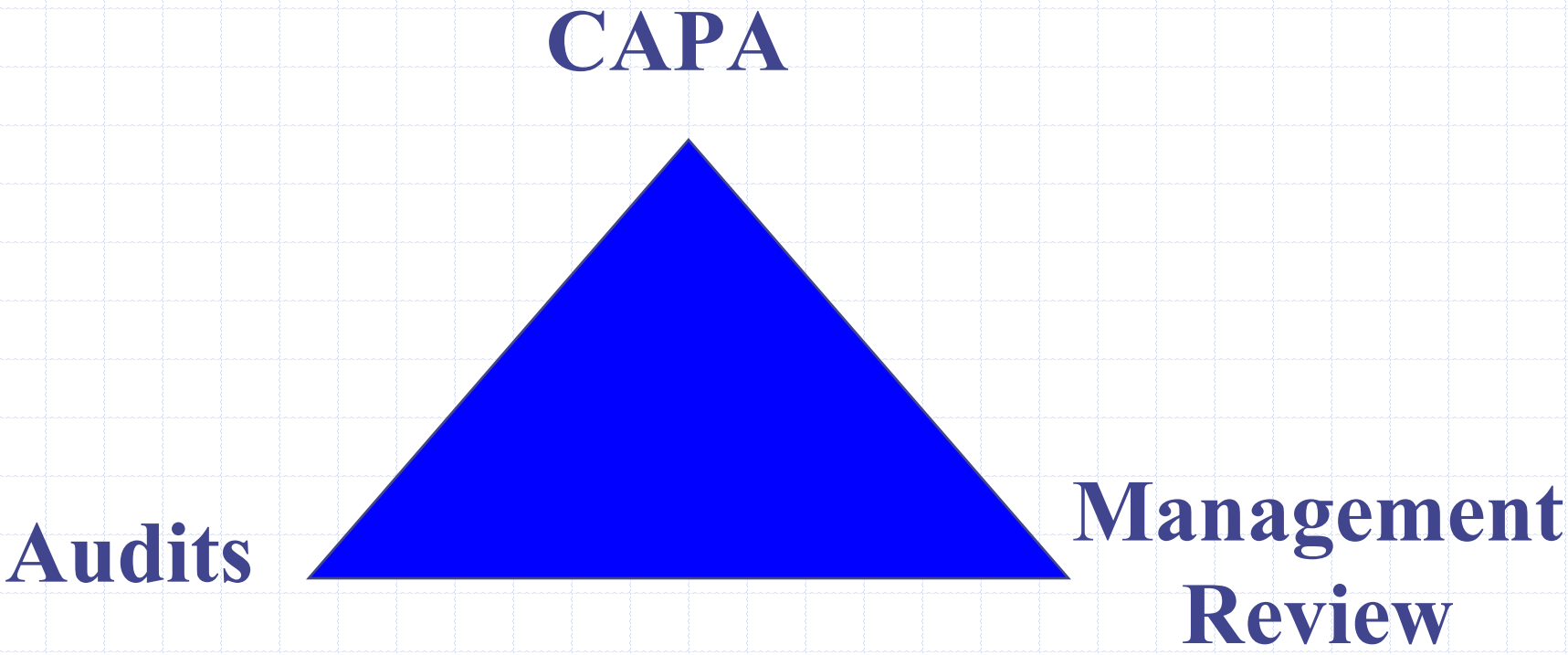
FDA Access to Audit and Management Review Reports

- However, the procedures that show conformance with 21 CFR 820.50, Purchasing Controls, and 21 CFR 820.20(3)(c), Management Reviews, and 21 CFR 820.22, Quality Audit, are subject to FDA inspection.

FDA Access to Audit and Management Review Reports

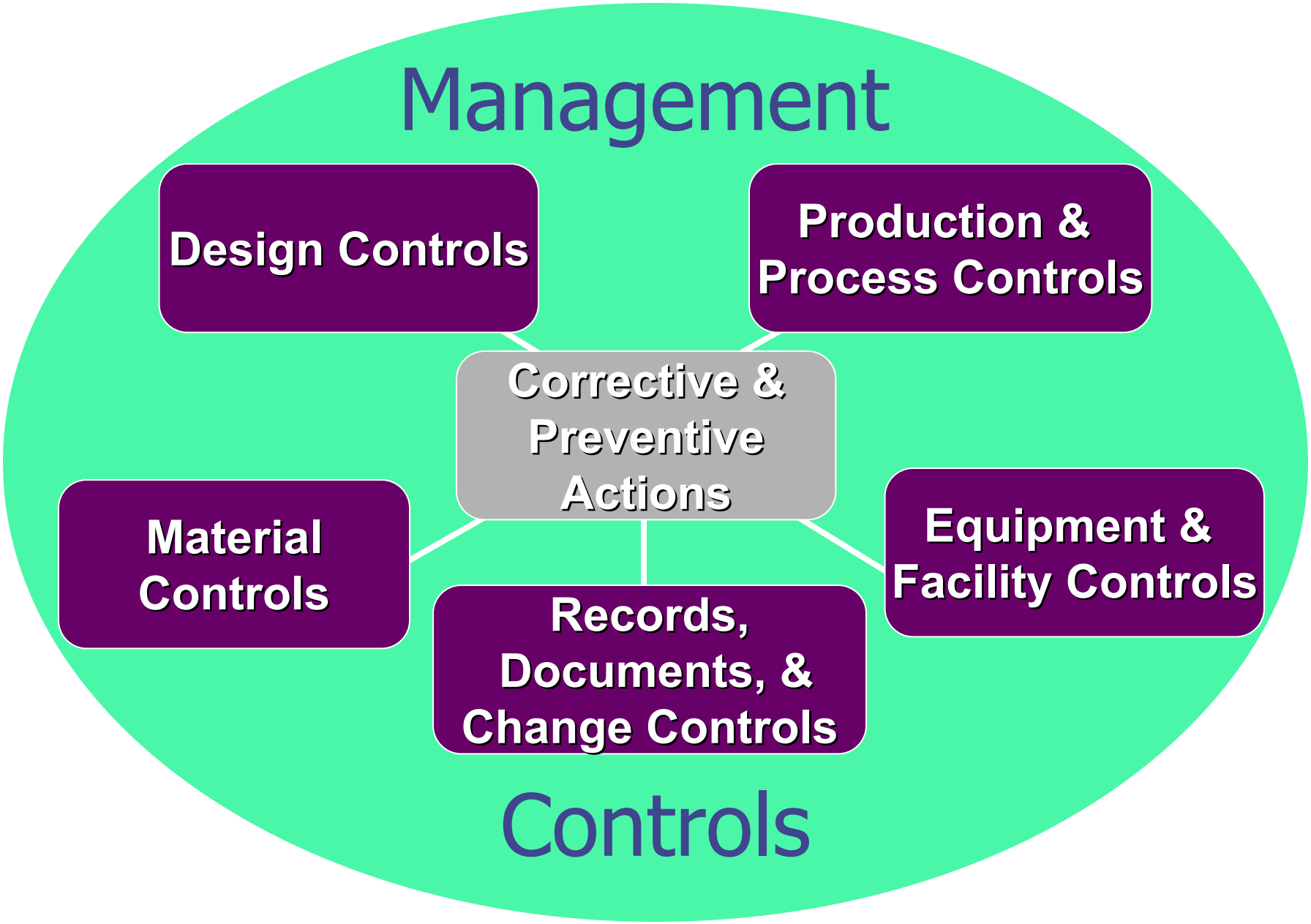
- FDA may look at those portions of these audit reports and reviews that contain corrective and preventive actions if these are the only places these action decisions are documented.

How does Management Assure an Effective Quality System?



At the Conclusion of the Inspection ...

"Evaluate whether management with executive responsibility ensures that an adequate and effective quality system has been established and maintained."


Management
Design Controls
Production & Process Controls
Corrective & Preventive Actions
Material Controls
Equipment & Facility Controls
Records, Documents, & Change Controls
Controls

A Proposed Worksheet for Auditing cGMP Responsibilities and Accountabilities

Job Title/Employee	Quality System	21 CFR Part 211 Subparts										
		A	B	C	D	E	F	G	H	I	J	K

A Basic Model for Auditing for the New cGMP Initiatives

I keep six honest serving-men:

They taught me all I knew;

Their names are What and Where and When

And How and Why and Who.

I send them over land and sea,

I send them east and west;

But after they have worked for me,

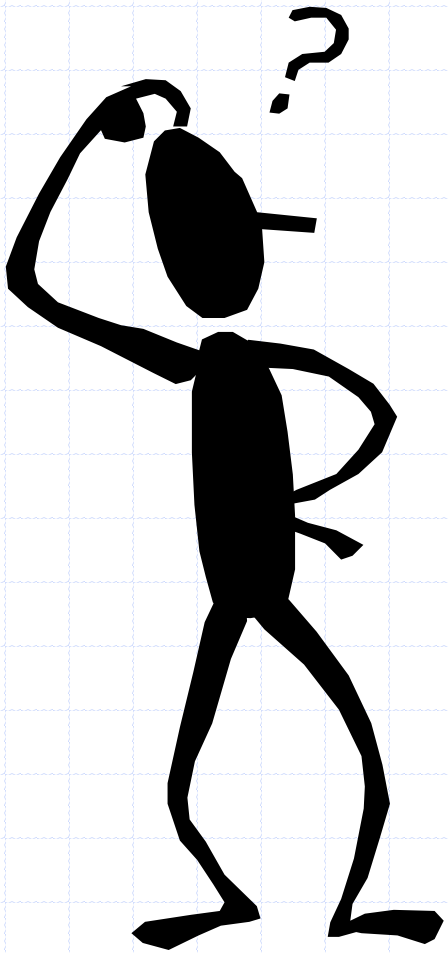
I give them all a rest.

"The Elephant Child", Rudyard Kipling

A Proposed Process for Auditing for the New cGMP Initiatives

- What are the responsibilities?
- Where are the gaps?
- When are the cGMP Priorities at risk?
- How are the cGMP priorities impacted?
- Why is the impact important?
- Who can close the gap?

Questions and Conclusion



In conclusion, I need to say

"Yes, I have Questions."

I know I have not answered all of your questions, and some of your questions have not been answered fully.

In fact, I know you may now feel confused on subjects where you once felt command and control. Totally new questions in entirely foreign areas may now be opened for you.

For those of you with these discomforting feelings of confusion and searching, I sincerely apologize.

To that end, I close with a prayer that we are now confused and searching for knowledge on more important things with much higher priority

using a balanced quality and training systems approach.

Mitch Manning
Balanced Quality and Training Systems Advocate

Other Auditing Trends

11. Alarm Clock Auditing
12. Hot Potato Auditing
13. Hot Seat Auditing
14. On the Other Hand Auditing
15. I'll Know It When I See It Auditing
16. You Tell Me Auditing
17. Ostrich Auditing
18. Dodge Ball Auditing
19. Tennis Match Auditing
20. Budget Battle Auditing
21. Co-sourcing Auditing
22. We Are Here To Help You Audit

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