

The Situation

A major US-based solid dosage repackaging corporation (client) experienced multiple recalls of its products due to product mix-ups occurring within its processes. The client sought assistance from Protocol Link to provide cGMP compliance assistance to identify root causes, redevelop the quality systems to prevent recurrence, and manage the product recall efforts to closure.

The Solution

Protocol Link provided tactical management, subject matter experts (SMEs) for process and recall remediation, and On-the-Floor QA Mentors to accomplish a series of compliance initiatives. The initiatives included detailed compliance gap analyses, regulatory (FDA) liaison, comprehensive quality improvement strategies, batch record reviews, product inspection management, SOP and protocol generation, employee training and testing, contract laboratory assessments, on-the-floor mentoring, and comprehensive recall management services.

Tracking of project status was provided through daily briefings, detailed status reporting, electronic project scheduling, and regularly scheduled conference calls with senior client management during project execution. The project spanned a time period of more than 1 year. The solution required a coordinated, multi-faceted team approach. The key work elements to determine root cause and subsequent actions to fully remediate the situation and set a new, compliant course were as follows:

Quality Assurance (QA) - Provided cGMP compliance assessment, quality assurance, and quality control consulting services as listed below:

- Performed a comprehensive gap analysis to identify processes and procedures needing remediation, modification or addition.
- Prepared new SOPs, revised existing SOPs, and related technical documentation. Conducted extensive employee training for new and current SOPs, including competency testing.
- Reengineered the employee training recordkeeping system, and ensured employee cGMP training records were accurate and complete.
- Set up the Document Control Center for cGMP records retention.
- Provided constant on-the-floor QA mentoring across and throughout all shifts, specifically addressing the line changeover process. Developed and trained operators on new line changeover procedures and practices.
- Audited third party testing laboratories qualified and able to carry out microbiological testing in order to address potential cross-contamination issues.

FDA 483 and QSAP Management Activities - Created the client Quality System Action Plan (QSAP), FDA-483s responses, and represented client in FDA District meetings.

- Assisted client with review and content development of FDA-483 responses.
- Prepared the facility-wide QSAP and presented the plan and its implementation to the FDA.
- Managed the execution of the QSAP plan for the client. Ensured compliance gaps and prior commitments to FDA were incorporated into the plan. Directed client resources in implementation of the QSAP elements.
- Coordinated and documented completion of QSAP actions. Prepared evidence books supporting QSAP action items for ongoing client and FDA review.

Batch Record Review and Product Inspection - Reviewed client Batch Records and performed product inspection as part of the remediation effort.

- Prepared and executed a protocol-driven detailed review of over 1,500 Batch Records and associated products for re-inspection.
- Based on the Batch Record review and inspection results, worked closely with client QA management to re-disposition lots as either acceptable for release, acceptable for release after completion of additional remedial activities, or reject.
- Prepared Final Reports for the Batch Record Review and Product Inspection Protocol, and issued them to client management.

Product Recall Management and Coordination - Administered, coordinated and managed multiple product recall activities associated with over 4000 released-to-market lots in compliance with associated regulatory requirements.

- Completed a detailed gap analysis of the client product recall procedures versus current regulatory requirements and standards.
- Prepared new product recall procedures and associated protocols in support of product recall activities and ongoing cGMP compliance.
- Coordinated product recall activities to include risk evaluation, recall strategy, public notification, recall communications, recall status reports, and recall effectiveness.
- Communicated with the client network of pharmacies and served facilities nationwide.
- Maintained extensive databases to track responses received from pharmacies and served facilities, coordinators, inspectors and customers as well as follow-up calls made to these entities.
- Managed counting activities for recalled product returned by the pharmacies and served facilities. Performed accountability for all lots to include troubleshooting of count discrepancies.
- Prepared and distributed correspondence to FDA at routine intervals to report on product recall status, status, schedules, and closure.

The Result

Utilizing the expertise and guidance provided by Protocol Link, client operations were restructured. Repackaging operations were extensively modified with enhanced supply sourcing. The client quality system was re-established to meet FDA requirements. The multiple product recalls were completed and verified by the FDA and closed-out.