




Supplement Facts

Presented by
Blytheco
sage X3

Preparing For and Surviving **FDA Inspections:** Guidance for Nutraceutical Manufacturers


Beginning now...



Today's Agenda

- Introductions
- Discussion
- Q & A

How to Participate Today



- Arrow = Open/close your panel
- Questions = Submit text questions
- Follow-up email with video link

Joy Joseph, President, Joy's Quality Management Systems Inc.



- Specializes in implementation of the Dietary Supplement Current Good Manufacturing Practices through training programs and facility auditing
- Former Vice President of Quality, Technical Operations, Scientific Affairs and Research & Development for Pharmavite LLC
- Member of the USP Expert Committee on Dietary Supplements, Non Botanical
- Charter member for the American Association of Pharmaceutical Sciences
- Member of the Council for Responsible Nutrition (CRN) and other industry trade associations



Skip Hulme, Strategic Business Analyst, Blytheco



- Has consulted with hundreds of businesses, including many in process manufacturing
- Formerly Senior Product Manager at Sage Software
- Knows Enterprise Resource Planning (ERP) software inside and out after working with them for more than 10 years
- Previous background also includes more than two decades in software development and strategy, serving in a variety of management roles from Director of Operations, to VP of Product Management, to Chief Information Officer
- Holds an MBA in Finance and Operations from Boston University and a BS in Psychology and Mathematics from Duke University



Joy Joseph
Joy's Quality Management Systems

Preparing For and Surviving FDA Inspections: Guidance for Nutraceutical Manufacturers

Purpose Of Our Training Today



- When will FDA inspect my company?
- What is the law?
- What to expect during an FDA inspection?
- Inspection do's and don'ts



FDA Inspection SOP

- Do you have an FDA Inspection SOP?
- Gives guidance about what to do when FDA arrives to conduct an inspection.
- Have you read your company SOP?



Preparing for the cGMP Inspection

The advice that I am sharing today comes from actual experiences with our industry since the finalization of the Dietary Supplement Good Manufacturing Practices in 2007.

- Many FDA inspections could have gone better had the companies been prepared.
- Prepared means having a procedure in place to facilitate the inspection and where possible, reduce the level of non compliance that ends up on a 483.
- Being unprepared could lead to chaos: people running around not knowing what to do. FDA getting a bad impression.



What Does "Prepared" Mean?



- Knowing what is expected by FDA
- Knowing your company policies
- Management must know their responsibilities to ensure compliance
- Employees and management must know their jobs and cGMPs



Prior Warning

- FDA will not give prior notice for an inspection
- Therefore, we must be prepared.
- A training program for key employees is essential to the outcomes of your inspections



Prior Warning



- You will first know of your inspection when the FDA arrives at your plant.
- For a full cGMP inspection, you may see 2-3 FDA inspectors.
- The audit could take three days or longer, and not in any particular sequence.
- Recently, the number of days and inspectors have increased.



Types of Operations

- Manufacturers
- Branded
- Contract
- Packers
- Holders
- Own Label Distributors
- Fulfillment Centers



All of the above are subject to a visit from FDA or other regulators



Mixed Facilities/Mixed Inspections?

Facilities that manufacture, package and hold pharmaceuticals, dietary supplements, and foods:
Some Inspections have been focused upon the more stringent of the requirements. Others have been specific.

- For Drugs: Part 211
- For Dietary Supplements: Part 111
- For Foods: Part 110

Each of these categories must have separate and defined areas with no co-mingling.



Own-Label Distributors and Warehouses

- OLD's and Warehouses are still confused or simply in denial about having to comply with SOPs and cGMPs.
- Standard Response: "We are not manufacturers. We never touch the product. Show me in the regulations where it states we must comply."
- OLDs and Warehouses will be inspected by FDA and other regulators and must comply with regulations.
- Training is a part of your preparedness.



How to Prepare for an FDA Inspection



- Trained Employees
 - cGMPs, SOPs, and Company Policies
- Designated Escorts
 - Usually the lead person for accompanying the inspector is from QA . Management should participate in the opening meeting and the closing with FDA
 - Subject Matter Experts for answering questions pertaining to certain areas
 - Persons for retrieving records
 - Practice these roles!



Preparation Must Haves

- Most Important: Have a Compliant Quality System in Place
- Written SOP on How to Receive and Escort a Regulatory Inspector
- Knowledge of appropriate responses to observations
- Regular In-house Audits simulating FDA and State inspections
- All of the above require training!



FDA Inspection SOP


Why an FDA Inspection SOP:

- Gives guidance about what to do when FDA arrives to conduct an inspection
- Know and practice your company SOP



FDA Expectations

- Management Responsibility
- What does FDA expect from your company, management (managers, directors, CEO)
- Employees




Expectations

FDA expects the managers, and executive management, in particular, to make the right decision

FDA also expects them to know the law, the regulations and to follow them

...Ignorance of the law is not an excuse!

NO EXCUSES




Expectations


Employees:

- Must be trained in and follow cGMPs and SOPs
- Records of training must be available for FDA review

Visiting Service Contractors:

- Pest Control Personnel, etc.
- Need to be made aware of:
 - Type of products being manufactured
 - What is required to prevent cross contamination or any kind of adulteration when providing services
- Need to be made aware of what is required of cGMPs in terms of required records





Responsible Individuals

The identification of those responsible for violations is:

- A critical part of the inspection, and
- As important as determining and documenting violations themselves

Responsibility must be determined to permit administrative judgment on whom to charge with compliance proceedings.

(IOM=Investigations Operations Manual)

FDA wants names!



The Dietary Supplement GMPs

21CFR Part 111, GMPs – Good Manufacturing Practices

- Have all levels of management reviewed them?
- Have you read the preamble (what is the preamble?)
- Have all employees been trained on the GMPs?
- Is GMP training documented in training records?



Training – GMPs and SOPs



FDA may ask about your training

- Show you are trained for the job you are performing
- *Check now – Report any shortcomings in your training records to appropriate management
- Get it done!



Top 5 cGMP Non-Compliance Findings – Previous Inspections

- Vendor/Supplier Qualification
- Raw Material and Product Specifications
- Finish Product Testing
- Master Manufacturing Records
- Quality Control Responsibilities



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FY 2014/2015 Inspectional Observation Summaries (600+ Inspections in 2015)

FY 2014		FY 2015	
Center Name	483s Issued	Center Name	483s Issued
Food	2478	Biopharma	123
Devices	971	Bioresearch Monitoring	283
Drugs	645	Devices	1008
Veterinary Medicine	337	Drugs	678
Bioresearch Monitoring	297	Food	2300
Biologics	146	Human Tissue for Transplantation	81
Human Tissue for Transplantation	115	Parts 1240 and 1250	66
Parts 1240 and 1250	70	Biological Health	17
Biological Health	16	Veterinary Medicine	294
Sum Product Area 483s from System*	5074	Sum Product Area 483s from System*	4850
Actual Total in System 483s**	4943	Actual Total in System 483s**	4751

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Dietary Supplement 483 Observation Break


2015 Top 6 Total Observations By Subpart:

1. Subpart E (Production & Process Controls) – 385
2. Subpart F (Quality Control Unit) – 151
3. Subpart H (Master Manufacturing Records) – 139
4. Subpart I (Batch Records) – 130
5. Subpart C (Physical Plants & Grounds)- 80
6. Subpart O (Complaints)– 63

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NEW – FDA Non-Compliance Findings in Recent Inspections

- Written Justifications for Qualifying Raw Materials for Reduced Testing
- Documentation for Scientifically Validated Tests Methods for Raw Material Identity Tests
- Written Justification for Statistical Sampling Plans for Finish Product Testing
- Inadequate Material Reviews and Corrective Action Plans – Not the Subject of an SOP
- Functional Materials Not Included in Written Raw Material Specifications, Hence Missing From Product Labeling



Preparation Includes:

- Review your last FDA or State Inspection /Make sure all issues have been addressed
- Review your complaint files/Look for trends – **FDA will**
- Review Warning Letters (FDA Website)
- Review and update your SOPs. **Employees change things!**



Preparation Includes:

1. Perform your own internal audits and Gap Analysis
2. Report findings to management and request support to implement corrective action plans
3. Create a To-Do List with a schedule for completion
4. Address the corrective actions, based upon the level and severity of non-compliance



Escorts and SME's



Never lie

- Never make up an answer
- Never guess at an answer

Be careful what you volunteer

- Answer what was asked – only
- Do not provide information that goes beyond what was asked

This can backfire, you must appear to be cooperative!



Escorts and SME's

Interview Techniques

- Relaxed
- Truthful
- Cooperative
- Eye Contact
- Body Language
- Engaged



Include in Escort and SME Training

Be honest

- Don't provide false information



Be careful what you promise

- Deliver what you promise
- Be cooperative but fair and firm




Include in Training


- Don't threaten, confront, or challenge investigators
- Do not offer the investigator gifts
- Do not provide or offer lunch to investigators.



The Importance of the Truth


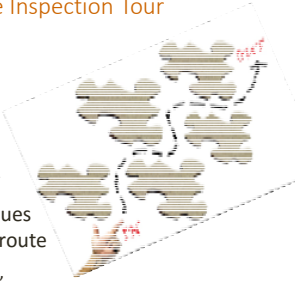


- FDA is trained to get information many ways
- What seems like unimportant information can be used against the company
- Lying to a Federal Officer is a Federal Crime
- Punishment can occur
- FDA Office of Criminal Investigation (OCI)



Handling the Inspection Tour

1. Plan route
 - Avoid weak areas
 - Showcase strong areas
2. Who will narrate
3. Walk route frequently
4. Anticipate possible issues that could affect tour route
 - Deliveries, Maintenance, Construction



The Inspection

1. Keep FDA busy and minimize down time
2. Keep up with their requests
3. Keep up with their concerns (ask them what they are finding)
4. Keep up with the requested "stuff"
 - Access to people
 - Access to places
 - Access to documents
5. Have requested documents available ASAP



Finally

- The information provided herein may not be a cure-all
- Being prepared will take the edge off
- It is intended to make your inevitable cGMP investigation move faster, reduce your anxiety and hopefully reduce the non-compliance observations, if any
- It is intended to result in a better outcome



Skip Hulme
Blytheco



Preparing For and Surviving FDA Inspections:
Guidance for Nutraceutical Manufacturers

Defense Strategies: Technology

What technology can manufacturers use to make sure they are ready for FDA inspections?



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Meeting FDA Requirements

Implement and use modern software designed to manage good manufacturing practices (GMPs) and QA/QC procedure data sets



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What Do Nutraceutical Manufacturers Need in ERP?

Look for a scalable solution that can meet UNPA Industry Standards and USP GMP audit standards and grow with your nutraceutical business. Optimal features include:

- Recipe/Formula Management
- Advanced Unit of Measure Conversion
- Complete Forward and Backward Traceability
- Quality Control
- Audit Trails and Electronic Signatures



More...



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What Do Nutraceutical Manufacturers Need in ERP?

Optimal features continued:

- Traceability of Lots, Sub-lots, Ingredients and Allergens
- Role-Based Menu System
- Stock Status, Shelf-life Management and Expiration Tracking
- Replenishment and Inter-Site Transfers
- Customer Service
 - Flexible Search, Single Point of Control
 - Call, Task and Appointment Tracking
- What about industry-specific ERP?



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Meeting FDA Requirements

Software applications can:

- Help nutraceutical companies quickly compile documentation to defend their products.
- Dramatically ease the burdens of managing enormous volumes of data while facilitating rapid response to regulatory allegations.



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Enterprise Resource Planning (ERP)

ERP systems make management information available throughout an organization, including:

- Finance and accounting,
- Distribution,
- Manufacturing,
- CRM (customer relationship management),
- Sales and service,
- Human resources, payroll, etc.



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How Do You Know When You Need a New System?

Are you experiencing these issues/needs?

- You don't have good visibility into business data—financial, order flow, etc.
- You're using multiple software systems for different processes—or worse, Excel spreadsheets
- Financial/accounting processes are slow and cumbersome
- Your IT management is painful
- Sales and customers feeling pain
- Users are not using the existing system(s)



How Do You Find the Right Software?

Work with a consultant that has experience with thousands of installations, ideally in the same or similar industries

- Thorough discovery
 - Helps you select the right system
 - Avoid budget overruns
 - Smooth integration
- Experience with variety of solutions
- Looks for the right solution for your needs, not just what they sell




Next Steps?



- Get a free 2-hour consultation
- Want more info or a case study? Visit Blytheco.com
- Questions? 949.583.9500, x2500 or solutions@blytheco.com



Q & A



Please type your questions into the Questions Pane on your GoToMeeting Dashboard.

