Risk Based Surveillance Inspections

The who, what and where...

Russell Wesdyk
Acting Director
Office of Surveillance
Surveillance - Past

Dirty data
Poor systems
Not integrated

Recalls  Incidents  EIR Review

SSM  eDRLS
Surveillance - Future

Use data → knowledge to make better internal decisions

SSM | NIPP

Quality Intelligence

eDRLS | Quality Metrics

Recalls | Incidents | EIR Review

Cleaned Data, Integrated Systems, Enhanced Regs
Office of Surveillance... Eventually

• The questions
  – Who/what is out there?
  – What do we know/think about them?
  – Where should we go to inspect?
  – What might we find or focus on?
  – How should we inspect and classify findings?

• The output
  – Inventory/supply chain lists
  – Site Dossiers
  – Product Dossiers
  – GMP classification standards and site classifications

• All with a little (a lot) of help from our friends
Office of Surveillance

Office of Surveillance Immediate Office

Division of Quality Intelligence, Risk Analysis and Modeling
- DIB
  - Sites/Products
  - Who/what is out there?
- QIB
  - Quality Metrics
  - Quality Intelligence
- RAMB
  - SSM & SSI List
  - Where to go?

Division of Quality Surveillance Assessment
- QDAB
  - FARs/BPRDs Sampling
- IAB
  - EIR Evaluation
- ORA
  - NIPP

What might we find? (dossiers)
What are we seeing?
What should we do when we get there?
Office of Surveillance

Office of Surveillance Immediate Office

Division of Quality Intelligence, Risk Analysis and Modeling

DIB
Sites/Products

QIB
Quality Metrics

RAMB
SSM & SSI List

QDAB
FARs/BPRDs Sampling

IAB
EIR Evaluation

ORA
NIPP

Who/what is out there?

Where to go?

What might we find? (dossiers)

What are we seeing?

What should we do when we get there?
FDASIA 705

(A) The compliance history of the establishment.

(B) The record, history, and nature of recalls linked to the establishment.

(C) The inherent risk of the drug manufactured, prepared, propagated, compounded, or processed at the establishment.

(D) The inspection frequency and history of the establishment, including whether the establishment has been inspected pursuant to section 704 within the last 4 years.

(E) Whether the establishment has been inspected by a foreign government or an agency of a foreign government recognized under section 809.

(F) Any other criteria deemed necessary and appropriate by the Secretary for purposes of allocating inspection resources.”

• FDASIA 706 allows information to be requested “in advance or in lieu of an inspection”
Context - Surveillance Model Structure

SITE SCORE

PRODUCT & PROCESS
- Product List

FACILITY FACTORS
- Establishment Type
- Inspection History
- Establishment Size

TIME SINCE LAST INSPECTION

Quality Metrics
SSM → SSI List → ORA Work Plan

- Inventory → SSM → Resource Considerations → SSI List → ORA Work Plan

- For 2016 the foreign and domestic inventory was combined

- SSM Steering Committee and ratifier process launched
  - There will be annual enhancements
  - Foreign inspection outcomes, recalls and scored FARs/BPDRs
  - Eventually quality metrics

- Submission of metrics would result in diminished risk rank score in SSM

- The inventory is large, the world is BIG, and our ORA inspectional resources are finite

- Has to be about how to not visit low risk and high performing sites
  - FDASIA 706 in lieu of language can assist us
How To Better Assist Our ORA Colleagues?

- **Site Dossiers**
  - Inspection history, coverage and scoring including foreign regulator inspection outcomes
    - Firm commitments noted
  - Product lists and history including FARs, recalls, etc...
  - Approvals since last inspection

- **Product Dossiers**
  - View across manufacturers of same product, class, or technology

- **OS staff available to investigators in advance and during**
  - POC for every site and inspection
  - Questions re observations, classification

- **Greater integration, involvement of specialized investigator, and faster path to facility classification**
A Site Surveillance (CGMP) Inspection

• With elimination of “2/3/4” there will be fewer combined PAI/SSIs

• PAI is product focused
  – Readiness
  – Conformance to application
  – Data Integrity

• SSI is systems based; scope is not changing
  – Though open to ideas such as quality culture....

• But the process by which FDA inspects is evolving
NIPP Organization Schematic

New Inspection Protocols Project
Steering Committee

Pre-Approval Inspection Protocol(s) Subgroup

Observations to inform premarket review decisions

Surveillance Inspection Protocol(s) Subgroup

Observations on state of quality in a facility to assess quality risk

For Cause Inspection Protocol(s) Subgroup

Evidence of cGMP violations to support enforcement

*Name TBD*
NIPP Expected Outcomes for FDA

- Maximize the value of time and resources spent on inspections
- Provide more consistent inspectional coverage and observations
- Facilitate faster and more consistent review of inspection reports

- Provide easily analyzable inspection data for trending, within and between sites
- Produce an assessment of the relative state of quality assurance of the firm being inspected (both positive and negative)
- Provide a tool to help determine the future inspection frequency based on risk
Status of SSI NIPP

• Phase I evaluation ongoing
  – Exploratory phase for feasibility
  – Have completed some SSI NIPP inspections
  – Protocol only used for evaluation purposes, and not factored into regulatory decision making or classification

• Investigators provided positive feedback

• Next steps
  – Continue pilot and review findings
  – Continuing to develop further modules
Overarching Message

• We are evolving

• We welcome input
A Provocative Question...

• When talking risk and inspections, does one size fit all... how far do we go and how far should we go? Which tools should we use and how should we use them?

• Imagine a continuum from on-site to virtual (off-site) inspections or even...
  – No inspection at all based on quality metrics via 706, and available data
  – Off site virtual inspection via quality metrics via 706, and other 706 requests
  – Abbreviated on site information gathering supported by 706 quality metrics
  – On site information gathering and assessment
  – On site evidence collection to support observations
  – On site evidence collection to support enforcement action

• Imagine a range of sites and segments
  – Sterile biologic
  – OTC topical non-systemic
  – Sterile small molecule
  – OTC systemic
  – Small molecule oral
  – API
  – Small molecule oral NTI
  – Medical gas