Reporting HCT/P Deviations

FDA AND THE CHANGING PARADIGM FOR TISSUE REGULATION

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Las Vegas, Nevada

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“Money won is twice as sweet as money earned”

From the movie *The Color of Money*

Topics to be covered

- Review of HCT/P Deviation reporting requirements
  - –What, who, how, when?
- Reports received to date

Subpart E - **Additional Requirements for Establishments Described in 21 CFR 1271.10**

- 1271.330 Applicability
- 1271.350 Reporting

21 CFR 1271.330 - Applicability

- Nonreproductive HCT/Ps, and
- Regulated solely under PHS Section 361
  - Reproductive HCT/Ps (semen, oocyte, embryo) –reporting not required at this time

21 CFR 1271.350 - Reporting

(a) Adverse reaction reports

(b) Reports of HCT/P deviations

- What, when, and how?

HCT/P Deviation Reporting

- Required for 361 HCT/Ps as of May 25, 2005
- Biological Product Deviation reporting for licensed products already required by 21 CFR 600.14
- Investigational new drugs used in a clinical investigation – neither HCT/P deviation reporting nor biological product deviation reporting is required

HCT/P Deviation means an event: (21 CFR 1271.3(dd))

- That represents a deviation from applicable regulations in this part or from applicable standards or established specifications that relate to the prevention of communicable disease transmission or HCT/P contamination; or
- That is an unexpected or unforeseeable event that may related to the transmission or potential transmission of a communicable disease or may lead to HCT/P contamination

HCT/P Deviation Reporting (21 CFR 1271.350(b))

All HCT/P deviations related to a distributed HCT/P

- Must be investigated by the manufacturer
- Must report any such HCT/P deviation
  - That occurred in that facility or in a facility that performed a a manufacturing step for the facility under contract, agreement, or other arrangement
  - Only those related to "Core CGTPs"

Distribution
21 CFR 1271.3(bb)

- *Distribution* means any conveyance or shipment of an HCT/P that has been determined to meet all release criteria.

Core CGTPs
21 CFR 1271.150(b)

- Requirements directly related to preventing the introduction, transmission, or spread of communicable diseases
- Other requirements support the core CGTPs

Core CGTPs (10)
21 CFR 1271.150

- Facilities
- Environmental control
- Equipment
- Supplies & reagents
- Recovery
- Processing and process controls
- Labeling controls
- Storage
- Receipt, pre-distribution shipment, and distribution
- Donor eligibility determination (donor screening and donor testing)

When must I report HCT/P deviations?
21 CFR 1271.350(b)(3)

You must report each such HCT/P deviation *that relates to a core CGTP*...within 45 days of the discovery of the event.

Who must report HCT/P deviations?

- "You"
- Establishments that manufacture HCT/Ps
- If the HCT/P deviation occurred in your facility or in a facility that performed a mfr step for you under contract, agreement, or other arrangement

How do I report HCT/P Deviations?

Report on Form FDA 3486, electronically or by

mail to:

Director, Office of Compliance & Biologics Quality, CBER (HFM-600)

1401 Rockville Pike, Suite 200N

Rockville, MD 20852-1448

- http://www.fda.gov/cber/biodev/biodev.htm
  - Product codes
  - Deviation codes

DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

BIOLOGICAL PRODUCT DEVIATION REPORT

FDA USE ONLY	
Date Received:	
Date Reviewed:	
BPD ID:	
BPD No.	

* Indicates required information

A. FACILITY INFORMATION

1. Reporting Establishment information

* Reporting Establishment Name

* Street Address Line 1

Street Address Line 2

* City | * State

Country | * Zip Code

* Point of Contact

* Telephone # ( )

E-mail

2. * Reporting Establishment Identification Number

FDA Registration #

CLIA #

3. If the BPD occurred somewhere other than the above facility, please complete this Section and Section A4, otherwise continue onto Section B1.

* Establishment Name

Street Address Line 1

Street Address Line 2

* City | * State

* Country | Zip Code

4. Establishment Identification Number:

FDA Registration #

CLIA #

B. BIOLOGICAL PRODUCT DEVIATION (BPD) INFORMATION

1. Establishment Tracking #

2. Date BPD Occurred

3. * Date BPD Discovered

4. * Date BPD Reported

5. * Description of BPD *(use Page 2 for additional space)* Go To Page 2

6. * Description of Contributing Factors or Root Cause *(use Page 3 for additional space)* Go To Page 3

7. * Follow-Up *(use Page 4 for additional space)* Go To Page 4

8. * Please Enter the 6 Character BPD Code

C. UNIT / PRODUCT INFORMATION

Please check the type of product:

Blood ☐ (Continued on Page 5)

Non-Blood ☐ (Continued on Page 5)

Biological Product Deviation Report

C2. NON-BLOOD PRODUCTS

TOTAL NUMBER OF LOTS:

Lot #	Expiration Date *(MM/DD/YYYY)*	Product Type	Product Code	Disposition	Notification (Y,N)
1.)					
2.)					
3.)					
4.)					
5.)					
6.)					
7.)					
8.)					
10.)					

U.S. Food and Drug Administration

Department of Health and Human Services

CENTER FOR BIOLOGICS EVALUATION AND RESEARCH

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CBER On-Line - Login Screen

If you are a first time user, please Create a New Account. If you are an existing user, please enter your User Name and Password below. If you have forgotten your password, but remember your username and e-mail address, go to the Forgot Password screen. If you need further assistance e-mail us with your account information: Contact CBER On-Line Technical Support

REMINDER:

User Names and Passwords are CASE SENSITIVE

Leading and trailing spaces will be removed from User Name and Password.

***User Name:**

***Password:**

***Application:** CBER On-Line - Main Menu

Enter CBER On-Line

***Required**

Forgot Password / Create New Account / Help

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CBER On-Line - Main Menu

Production Applications	Welcome to CBER On-Line
Biological Product Deviation Reporting (eBPDR)	
Blood Establishment Registration (eBER)	
HCT/P Establishment Registration (eHCTERS)	

Exit CBER On-Line Application | Edit Current Account | Change Password

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Electronic Biological Product Deviation Report (eBPDR)

Select Establishment for Reporting

Enter your establishment identification number below. Be sure to select the type of establishment identification number you are entering as either a Registration (CFN or FEI) or CLIA number. Note: The default establishment identification number type is CFN.

If you wish to retrieve a saved BPD Report enter both the establishment identification number and pre-confirmation number.

*Establishment Identification Number:

*Establishment Identification Number Type:

- (•) CFN Number
- ( ) FEI Number
- ( ) CLIA Number

P

*** Required**

Continue | View Report | CBER On-Line Main Menu

eBPDR Establishment Associations | eBPDR List of Active Users

What should I do if I have questions about HCT/P deviation reporting?

- Email account for questions about HCT/P deviations: HCTP_Deviations@fda.hhs.gov
- Contact CBER's Division of Inspections and Surveillance, Sharon O'Callaghan at (301) 827- 6220

HCT/P Deviation Reporting

- Encourage end users to forward reports on possible deviations to the manufacturer
- Guidance will be developed
- Reports are reviewed, tracked, and trended

HCT/P Deviation Reporting to date

- 77 reports received to date (some multiple products)
  - Reportable = 29
  - Non-Reportable = 48

HCT/P Deviation Reports
Products Involved

27 peripheral stem cells

25 cornea

11 bone

3 tendon

3 skin

3 oocyte

2 leukocytes

2 bone marrow stem cells

1 ligament

1 vascular graft

1 limbal graft

1 heart valve

HCT/P Deviation Reports
Reports to date include:

1. Donor screening or testing not performed or documented
2. Ineligible donor accepted
   - Risk factor, clinical evidence or physical evidence of communicable disease identified
   - Donor tested reactive for communicable disease
   - Donor incorrectly evaluated for plasma dilution

HCT/P Deviation Reports

Reports to date include:

3. Donor testing-testing not performed, not documented or incorrectly performed – HIV
4. Donor testing-unlicensed test used
5. Processing-HCT/P contaminated, potentially contaminated or cross-contaminated during processing

HCT/P Deviation Reports

Reports to date include:

6. Processing-in-process testing sample not representative of material to be evaluated
7. Inappropriate distribution
   - No review of required records
   - No sign-off by responsible person
   - Contaminated or potentially contaminated

HCT/P Deviation Reports

Reports to date include:

8. Incoming HCT/P not evaluated and inspected for damage and contamination
9. Supplies not verified to meet specifications for use

HCT/P Deviation Reports Not Reportable

- No products were distributed
- Not associated with disease transmission or contamination
- Not related to core GTP

HCT/P Deviation Reports Not Reportable

- Problem corrected prior to distribution of product
- Product released under urgent medical need

HCT/P Deviation Reports Not Reportable

- Positive pre-implant culture is in general not reportable as a deviation
  - Unless a complaint results in an investigation that reveals a departure from GTPs or
  - If the recipient had an adverse event, then report as an adverse reaction not HCT/P deviation

HCT/P Deviation Reports Not Reportable

- Reporting establishment was not manufacturer
- Reproductive HCT/Ps not required to report
- Product not regulated by FDA

“The safest way to double your money is to fold it over once and put it in your pocket”

Kin Hubbard