Corrective and Preventive Actions

"A Five Step Approach"

Tonya White-Salters

Topics to Be Covered

- What is CAPA?
- Governing authority
- Five steps to a good CAPA process
- Where companies have difficulty
- Example citations
- Recap…

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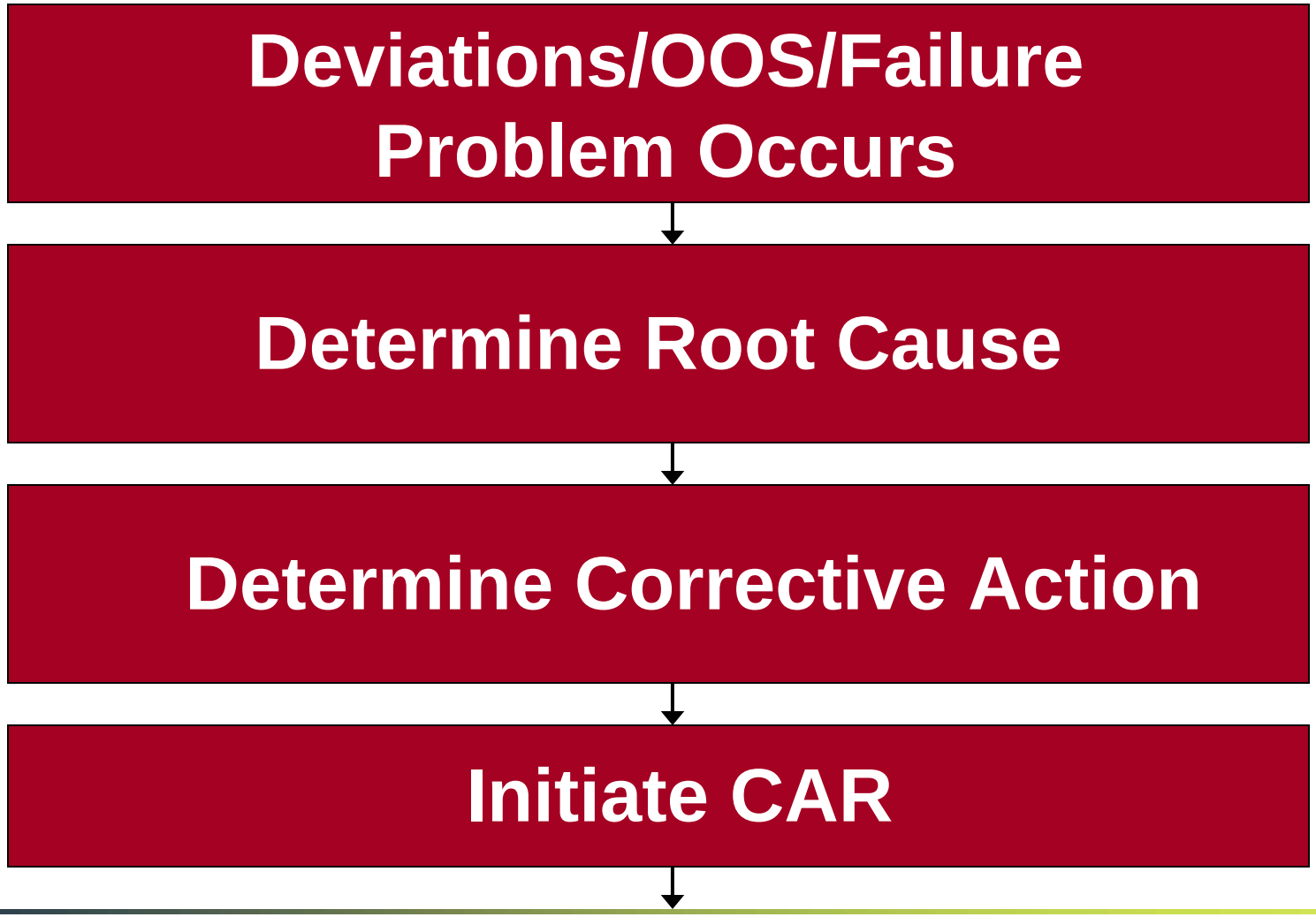
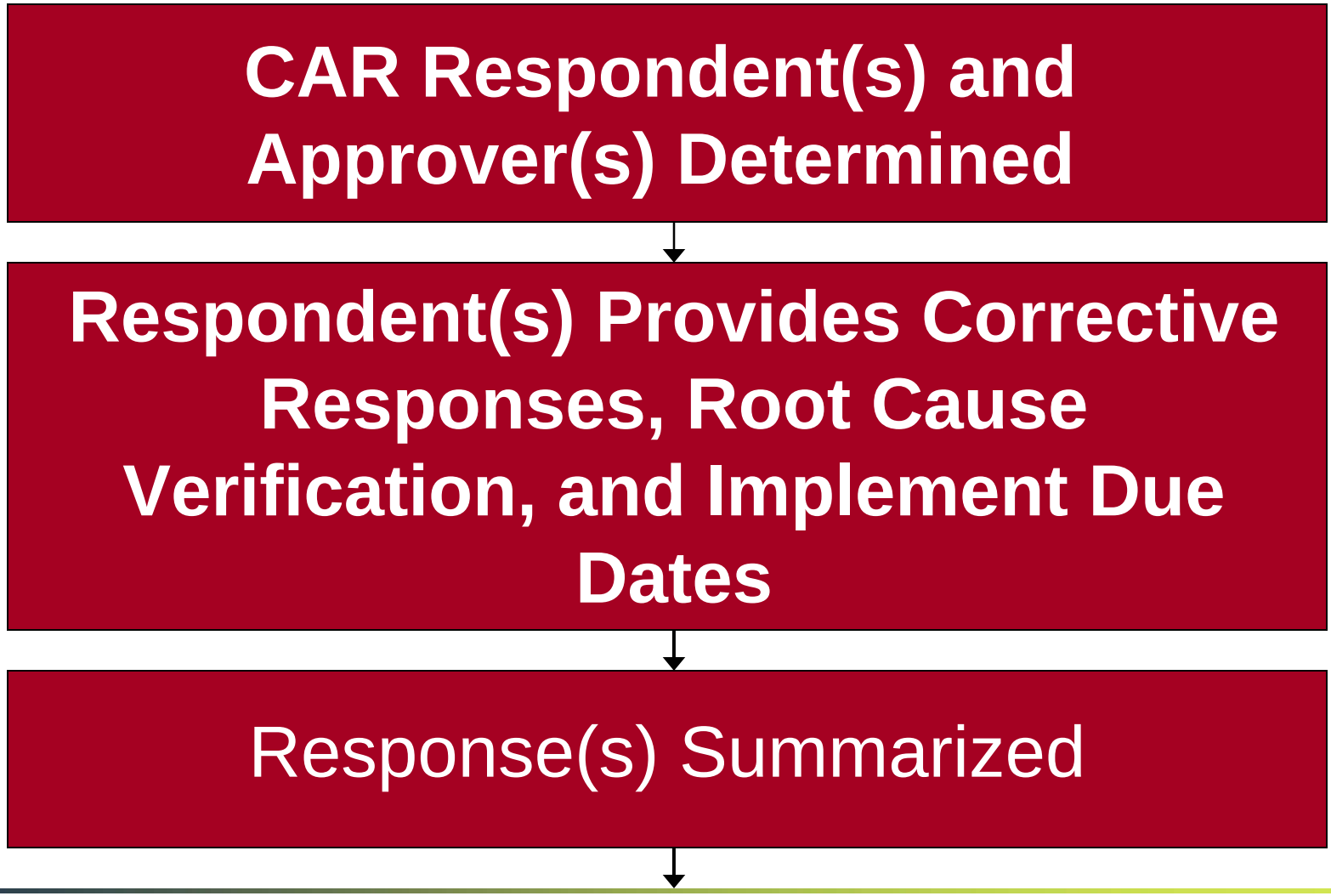
What Is CAPA?

- Corrective Action
  - eliminate detected nonconformity
- Preventive Action
  - prevent nonconformity occurrence

CAPA Process Map



CAPA Process Map



CAPA Process Map

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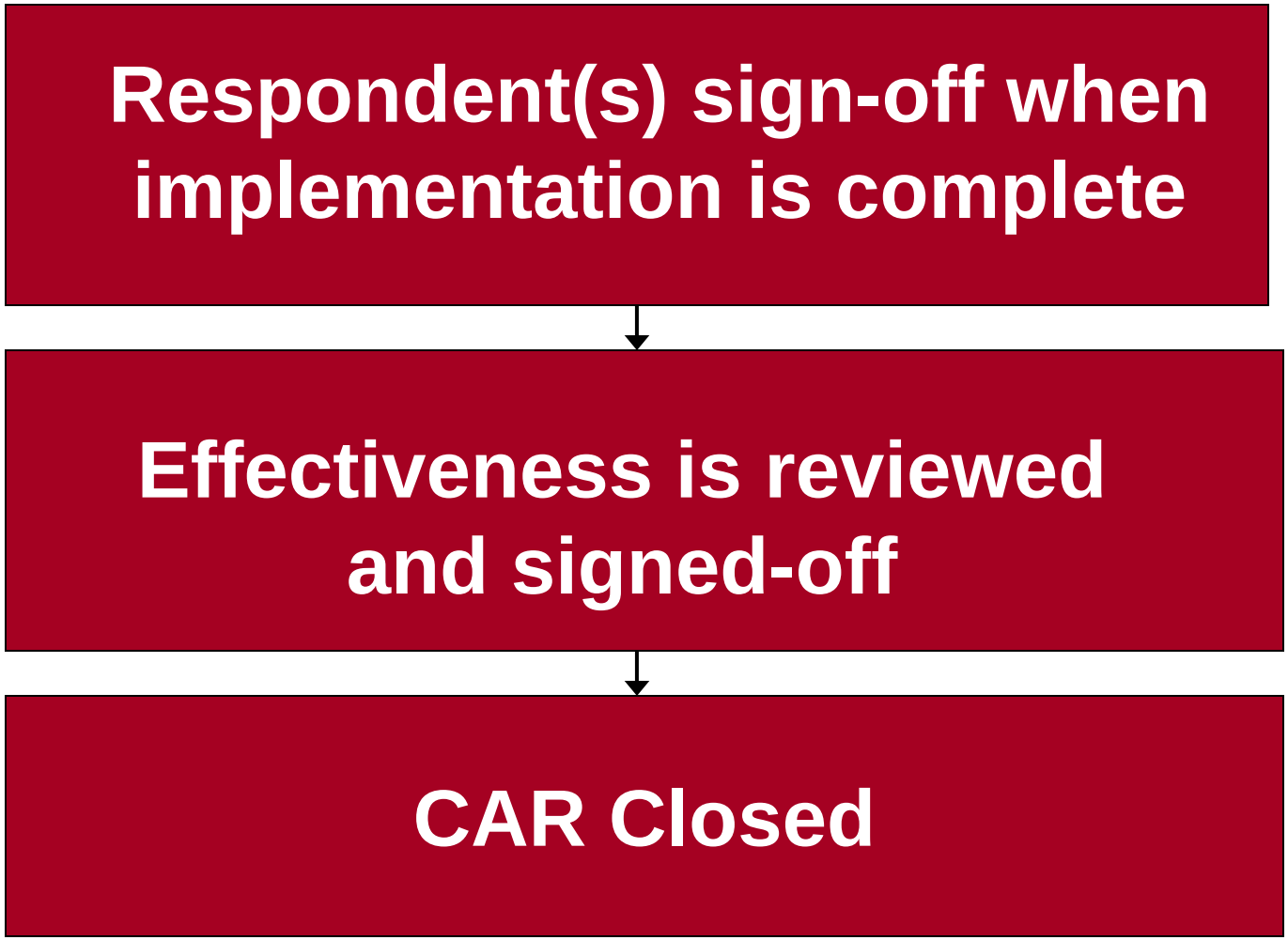


Governing Authority, FDA CFR Part 211- Finished Pharmaceuticals

- **Subpart J – Records and Reports**

- **211.192** "Any unexplained discrepancy shall be thoroughly investigated. The investigation shall extend to other batches …that may have been associated with the specific failure or discrepancy. A written record of the investigation shall be made and shall include conclusions and follow-up."

Governing Authority, ICH Q7A – Active Pharmaceutical Ingredients

6.5 - Batch Production Records

6.53 - "Written procedures should be established for investigating critical deviations or batch failures of intermediate or API to meet specifications. Investigations should extend to other batches."

Governing Authority, FDA CFR Part 820 - Quality System Regulation

Subpart J - Corrective and Preventive Action

(a) Manufacturer **shall establish procedures** for implementing **corrective and preventive action**. The procedures **shall include requirements** for:

Governing Authority, FDA CFR Part 820 - Quality System Regulation

Subpart J – CAPA cont.

(1) "**Analyzing processes**, work operations, concessions, quality audit reports, quality records, service records, complaints, returned product" …"**identify** existing and potential causes of nonconforming product, or other quality problems"…"statistical methodology shall be employed to detect **recurring quality problems**"

Governing Authority, FDA CFR Part 820 - Quality System Regulation

Subpart J - Corrective and Preventive Action

(2) **“**Investigating the cause of nonconformities relating to product, processes, and the quality system;”

Governing Authority, FDA CFR Part 820 - Quality System Regulation

"**Identify action(s)** needed **to correct and prevent recurrence** of nonconforming product and **other quality problems**;"

(4) **Verifying** or validating the **corrective and preventive action** to **ensure** actions are **effective**;"

Governing Authority, FDA CFR Part 820 - Quality System Regulation

Subpart J - Corrective and Preventive Action

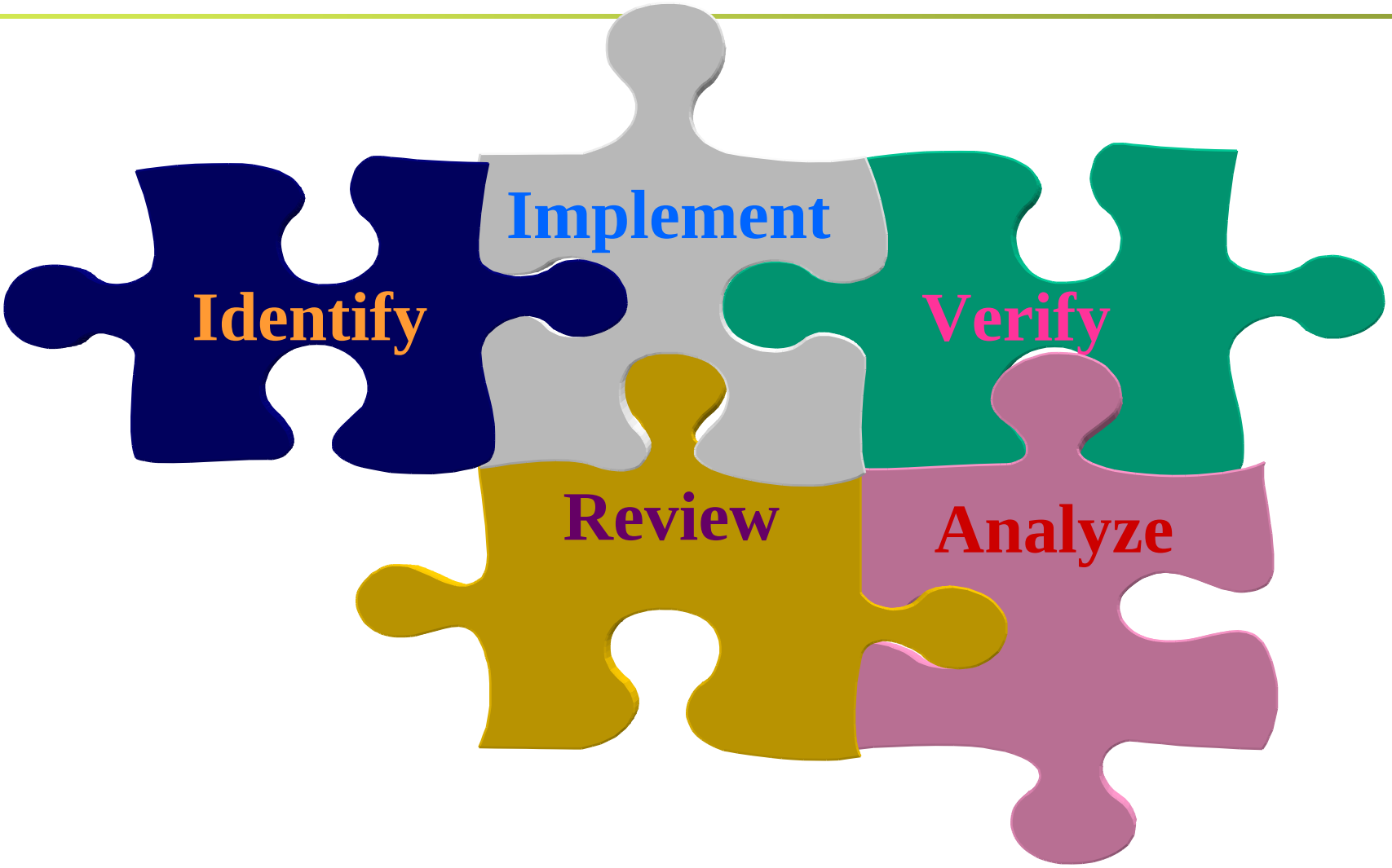
(5) "**Implement** and record changes in **methods** and procedures needed **to correct and prevent** identified **quality problems**;

Governing Authority, FDA CFR Part 820 - Quality System Regulation

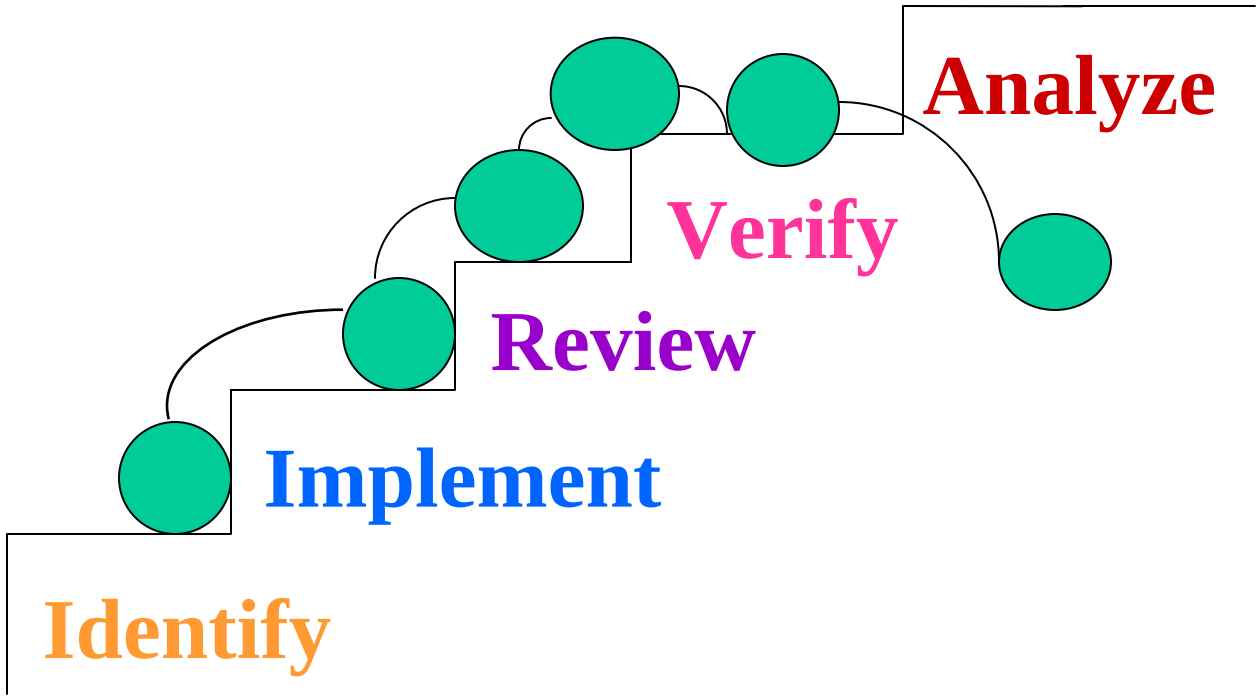
Subpart J - Corrective and Preventive Action

(7) **Submitting** relevant **information** on corrective and preventive actions, for **management review**.

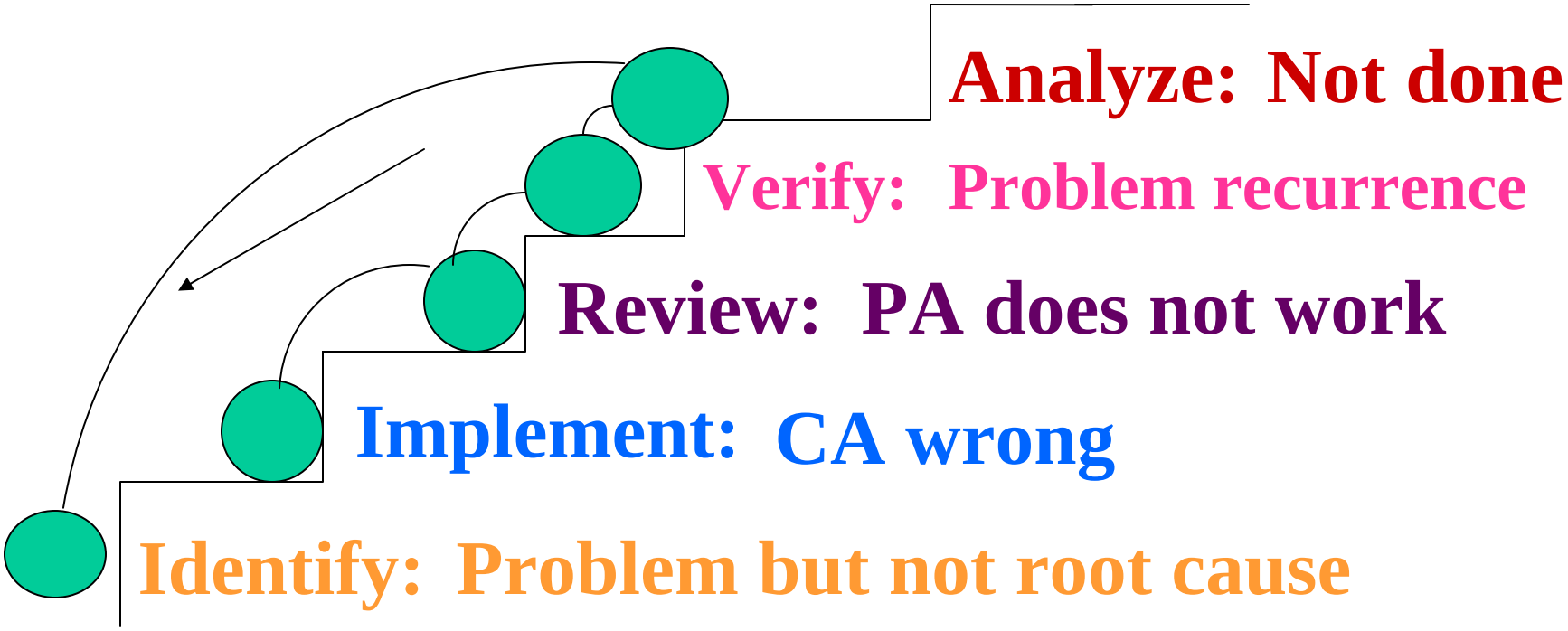
Five Step Approach



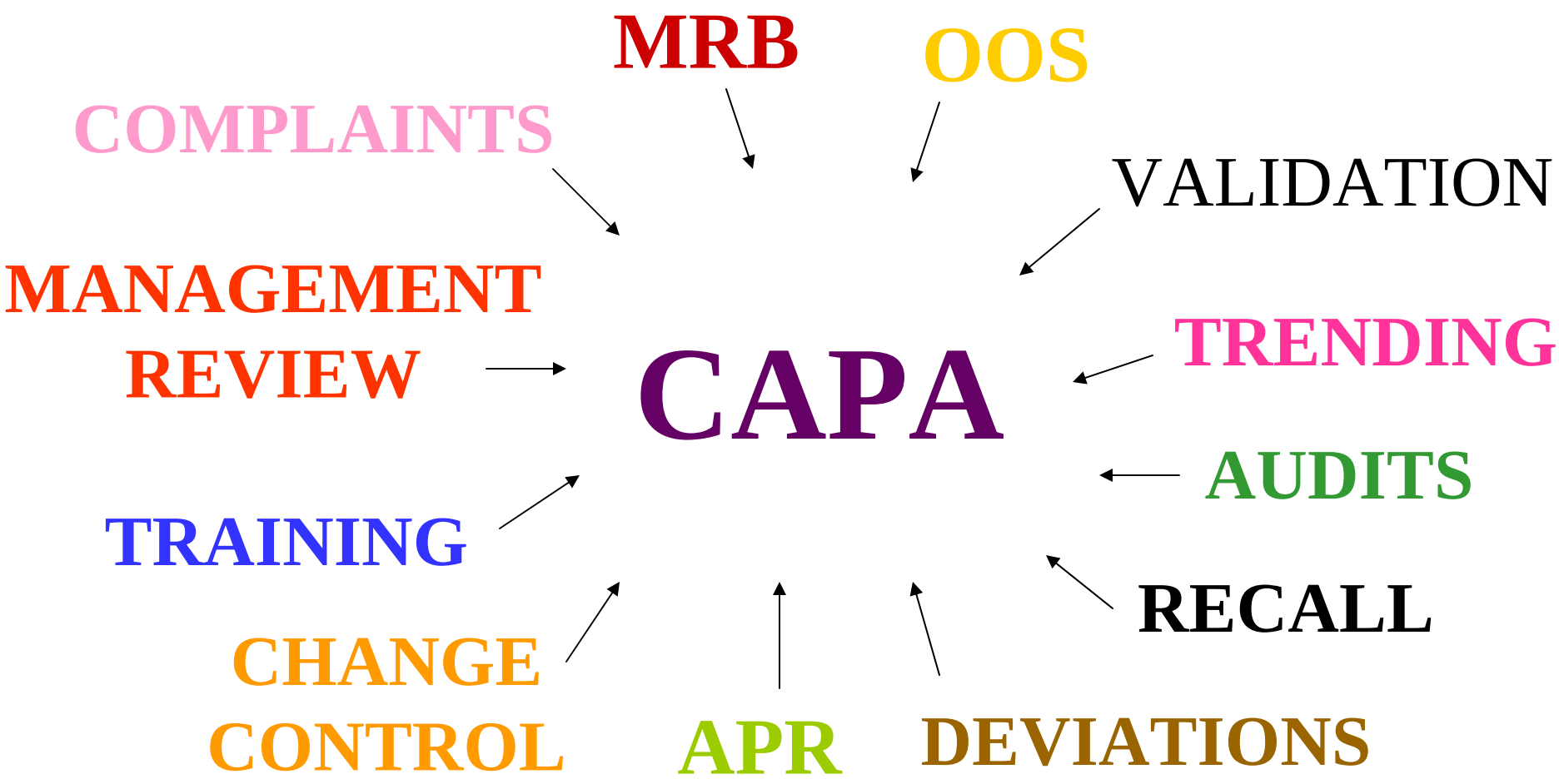
Where Companies Have Difficulty



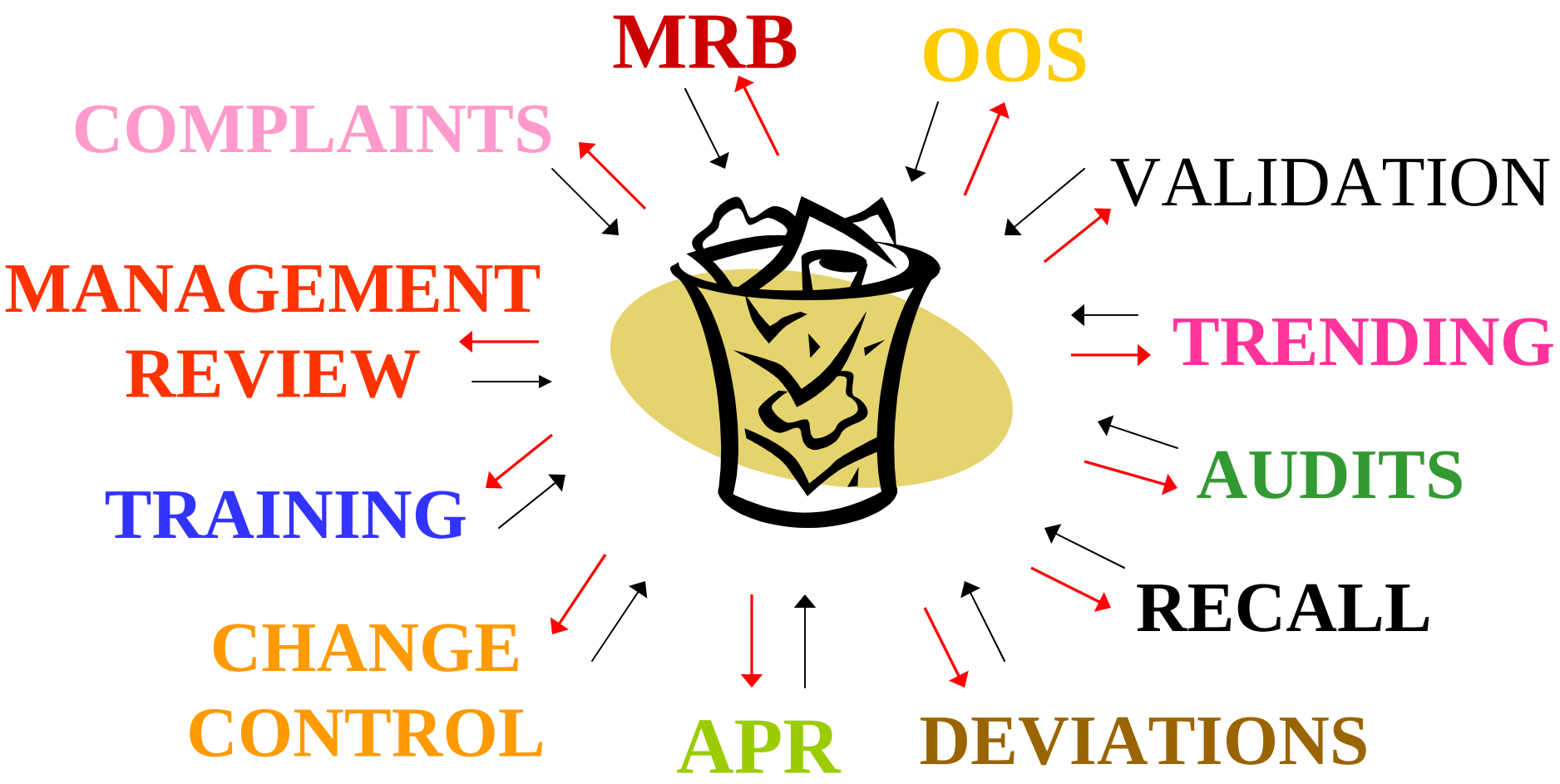
Why? Incorrect Root Cause Identified!

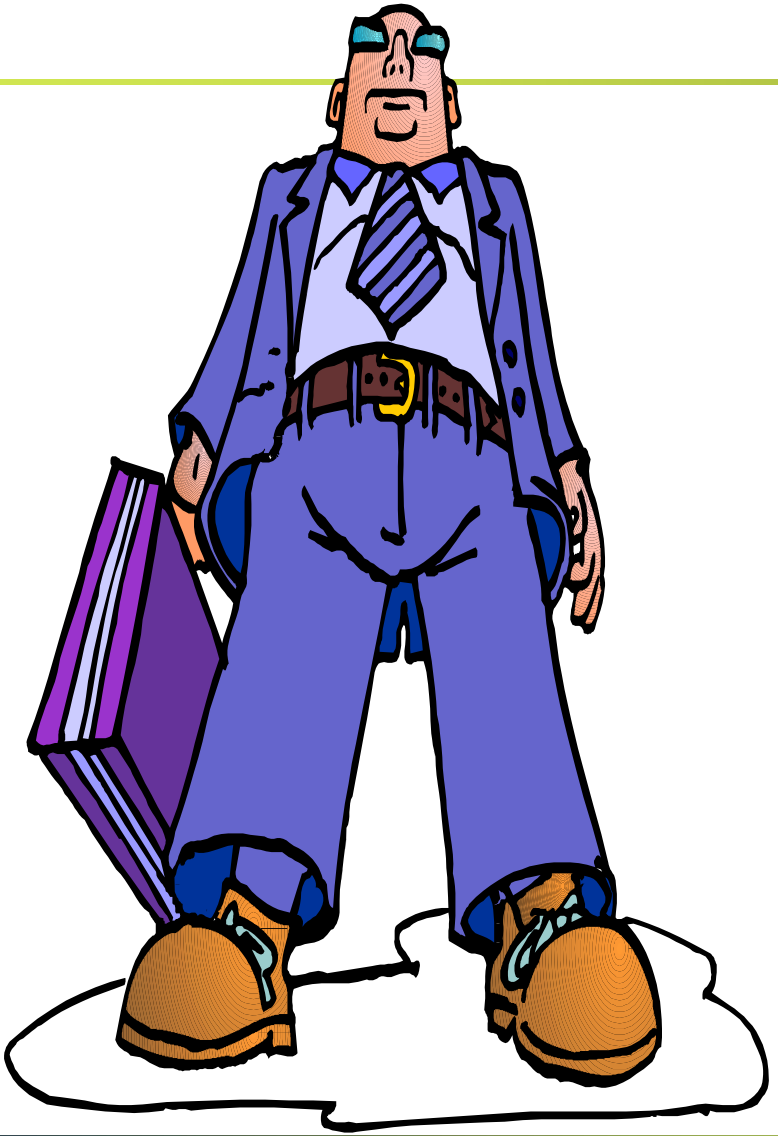


CAPA Subsystems



CAPA Subsystems





Example Citations

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Example Citations - CDER

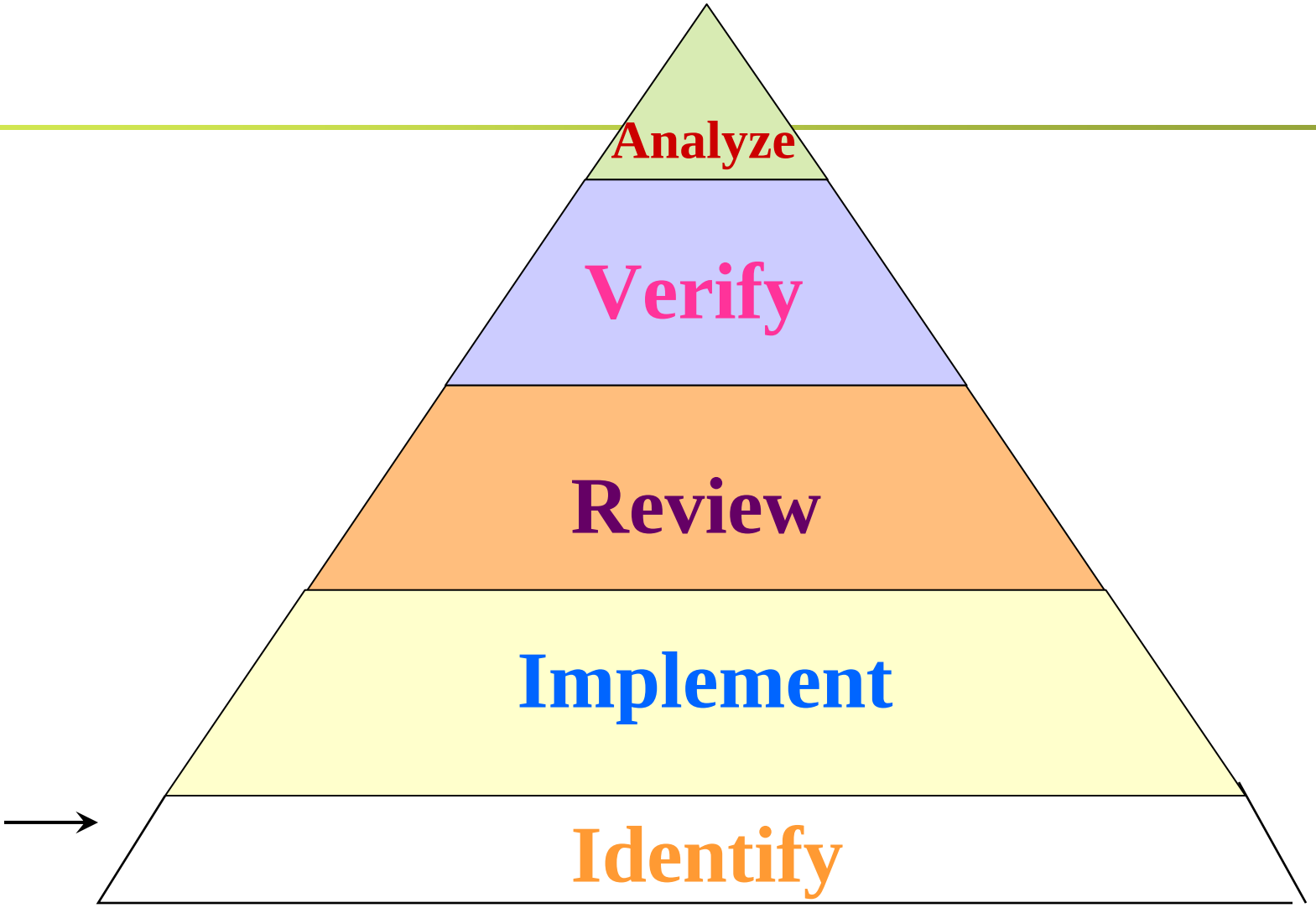
Failure to implement corrective/preventive action or conduct a thorough investigation

- **21 CFR 211.192**
- **21 CFR 820.100**

Examples

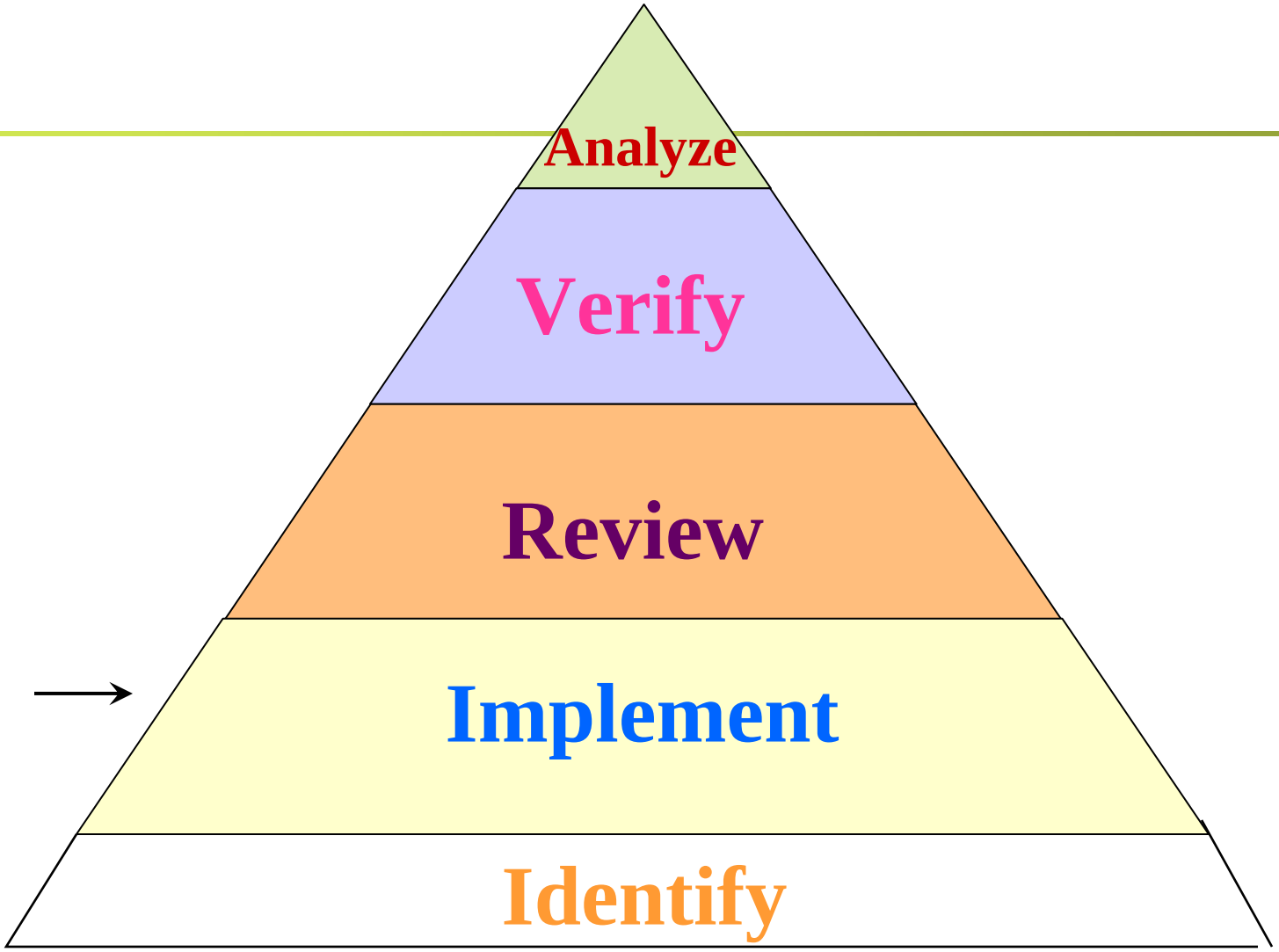
Repeated test failures not investigated

Inadequate investigation of failed particulate inspection


Analyze
Verify
Review
Implement
Identify

Example Citation – CDER –Q7A

- “Failure to document corrective action regarding instrument calibration check which did not meet specification”


Analyze
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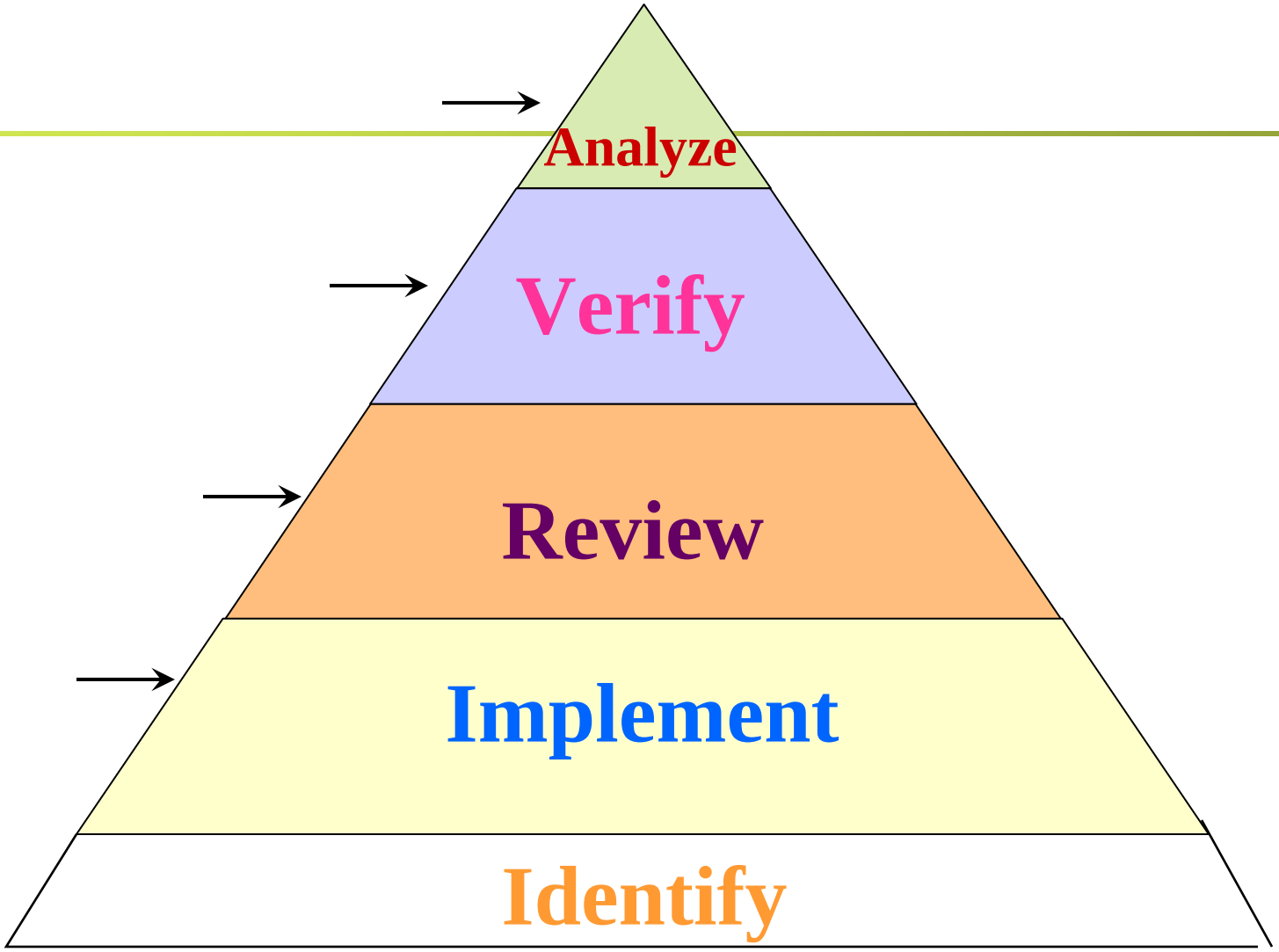
Implement
Identify

Example Citation - CBER

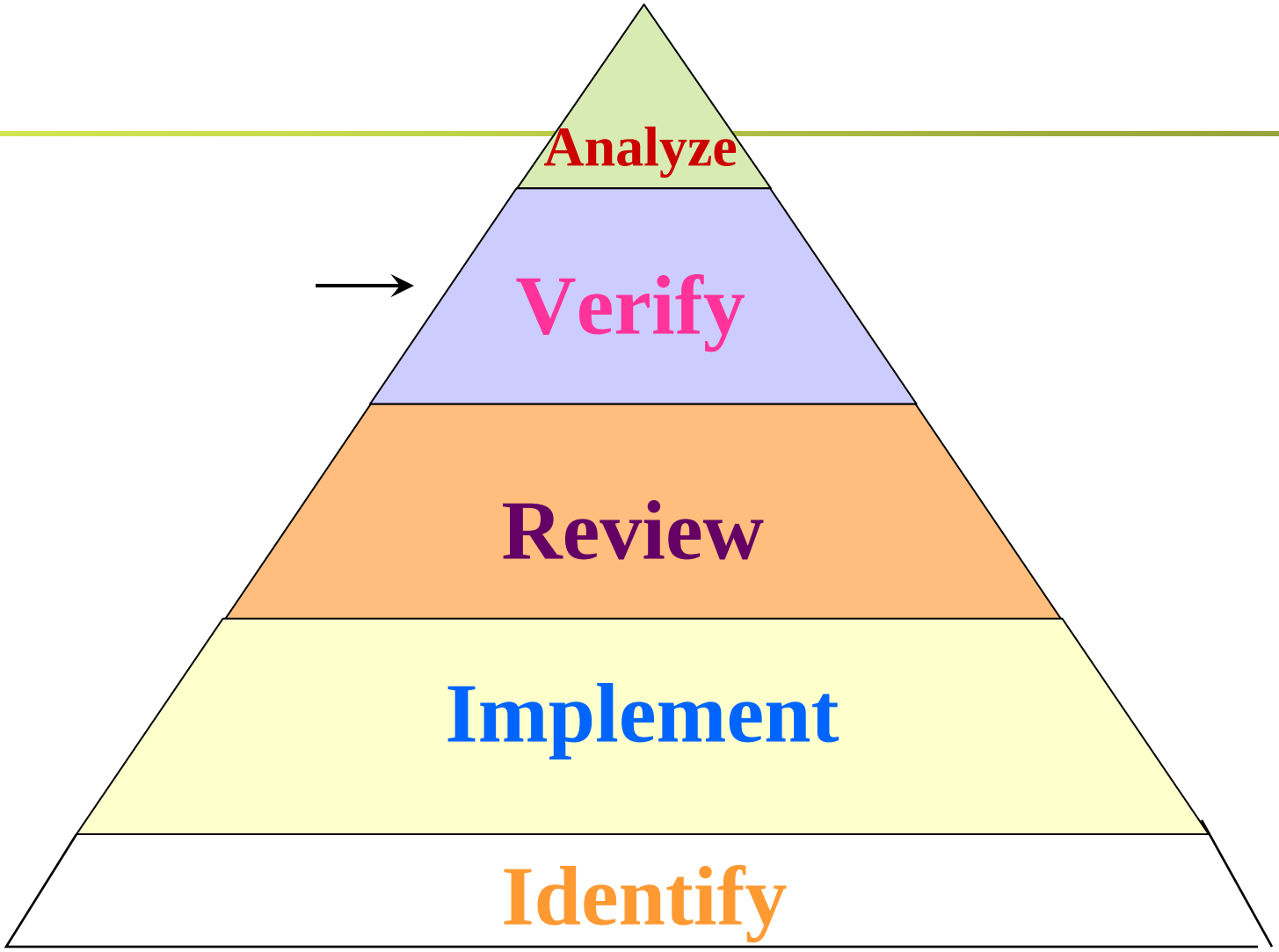
- Failure to establish and maintain adequate procedures for implementing corrective and preventive action, as required by 21 CFR 820.100(a) and (b). For-example:
- (a) The procedure titled corrective Action Handling [redacted] was not approved and implemented to address corrective and preventive action and no established procedure was found to have been in place.


Analyze
Verify
Review
Implement
Identify

Example Citation - CDRH

"Failure to adequately establish and maintain procedures for implementing corrective and preventive actions as required by 21 CFR 820.100(a)(1)"

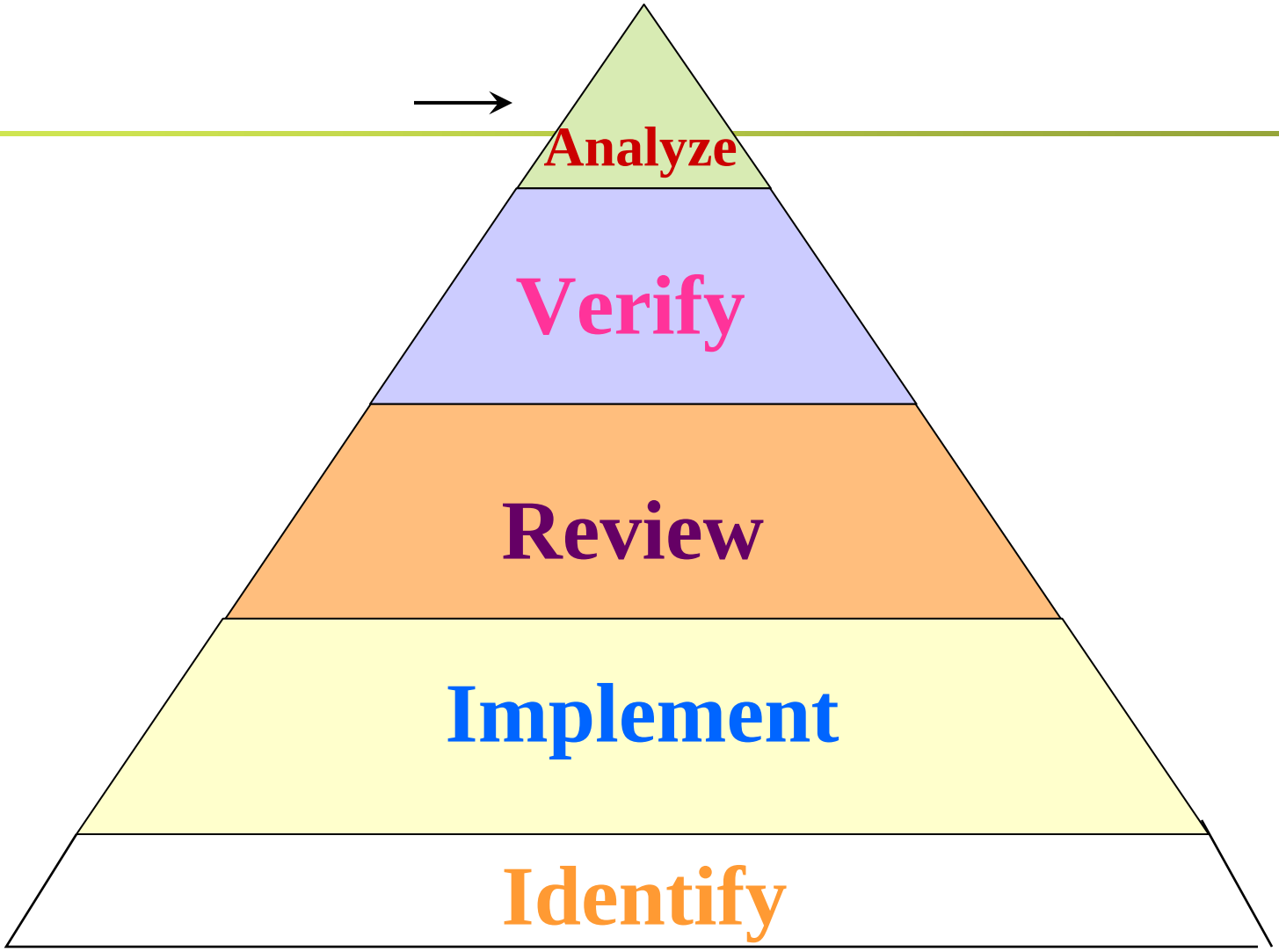
Example : a. "Corrective Action Request # & # were not closed out by the QC Supervisor as required by (SOP) Corrective and Preventive Action, Rev 1; and


Analyze
Verify
Review
Implement
Identify

Example Citation - CDRH

"Failure to adequately establish and maintain procedures for implementing corrective and preventive actions as required by 21 CFR 820.100(a)(1)"

Example :(b) (SOP) Corrective and Preventive Action, identifies repair reports as a source for identification of potential CAPA activities; however, repair reports are not being trended or reviewed for CAPA


Analyze
Verify
Review
Implement
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RECAP

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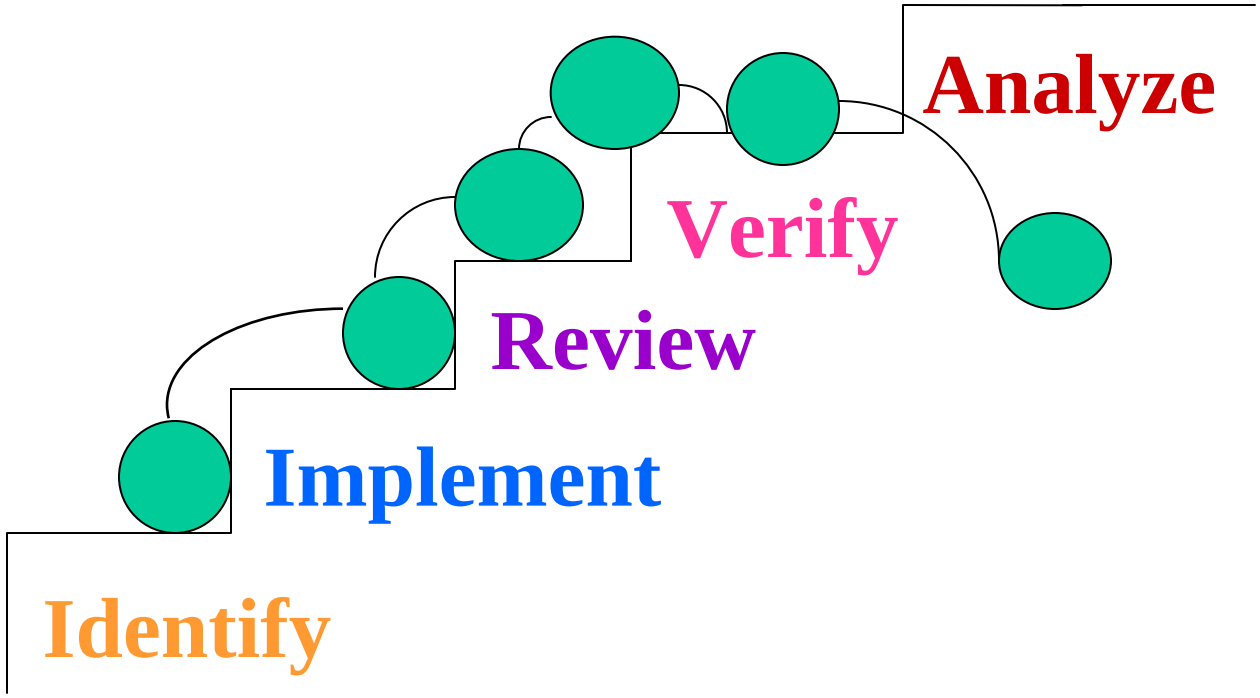
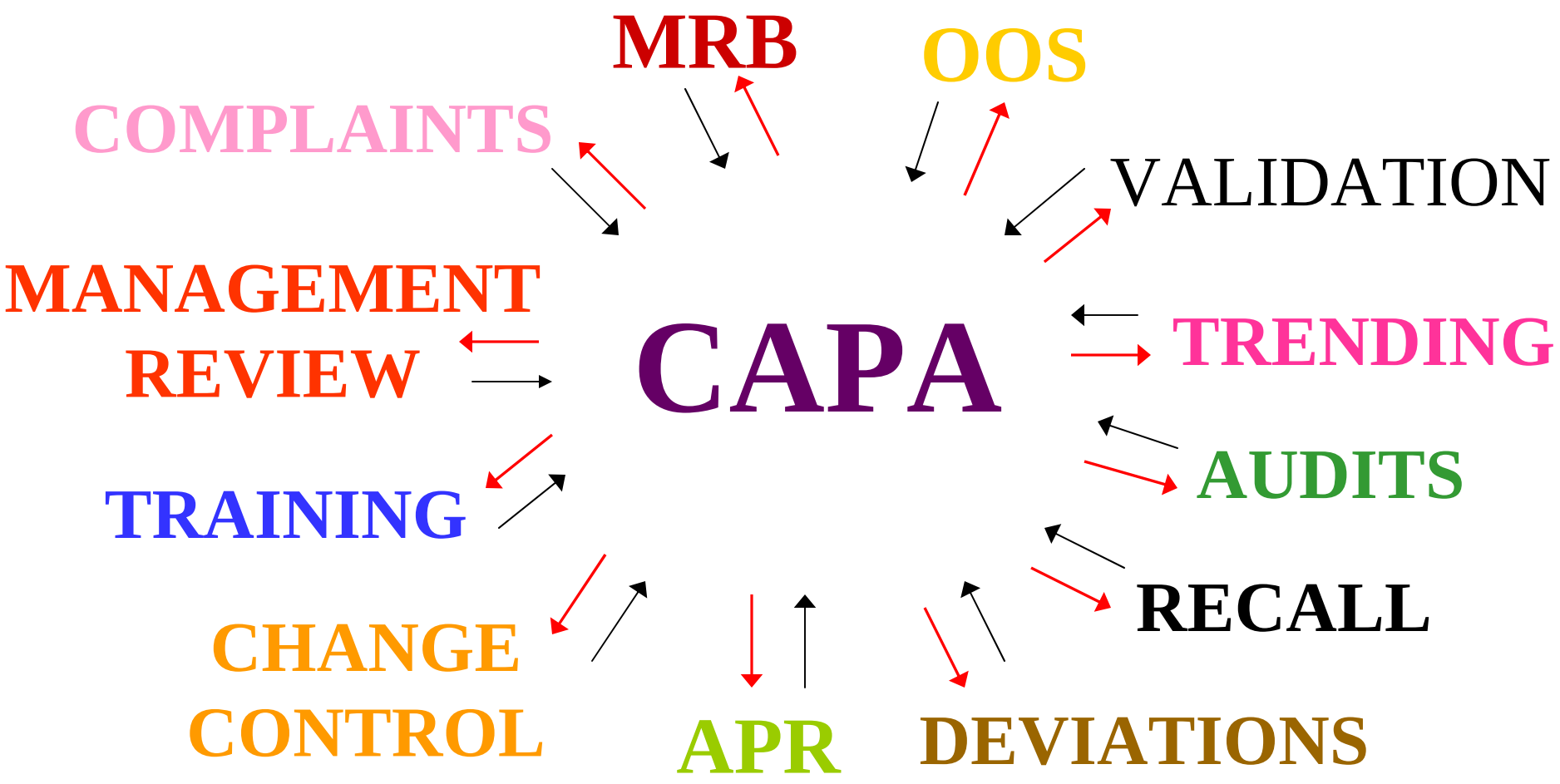
Recap

LACK OF ROOT CAUSE ANALYSIS



CAPA Subsystems



Questions?