Northern Highlights

NEW ENGLAND REGIONAL CHAPTER of the SOCIETY of QUALITY ASSURANCE

Volume 10 Issue Number 1 June 2007

President's Message

George Kuniholm, President, NERCSQA

Welcome to 2007!

As chapter President and on behalf of the Board of Directors, I would like to express my enthusiasm and optimism for a meaningful and productive year at the New England Regional Chapter of the Society of Quality Assurance (NERCSQA). Since our inception on October 17, 1995 NERCSQA has been actively conducting seminars and trainings, issuing newsletters, and providing networking opportunities to meet the needs of its members.

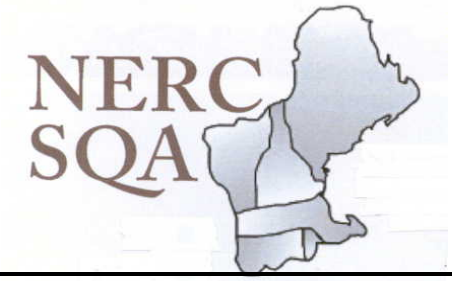
This year is no exception. Our first seminar in April includes various GMP scale up topics and a facility tour of Genzyme's Drug and Biomaterial R&D facility in Waltham. Our second event will be a two-day *Introduction to GLP* training conducted by Deb Garvin, Pacific Rim Consulting and a former SQA President. Our third event of the year will feature the annual members meeting and social and may include an agency speaker as well.

This year we are working to make membership more attractive than ever. Discounted rates will be offered to Government employees and students. Corporate membership has been revised to ensure that it is attractive from both providing appropriate opportunities for admission to trainings and name recognition and advertising.

The website continues to be an indispensable resource for the chapter. Currently, I am working with Past Presidents in order to ensure that we have the history of NERCSQA captured in terms of historical newsletters and seminar fliers.

Lastly, this year marks a transition for the chapter as we have now engaged the National SQA as our professional management firm – this will ensure the absolute most efficient service to our membership. For more information see the related article in this issue.

Again, welcome to NERCSQA 2007!



Inside This Issue

June 12th and 13th NERCSQA Presents A 2-Day Event

A Practical Approach to GLP's For the Study Directors, Quality Assurance and Scientific Staff

Presentation By: **Debra Garvin**
Location:

Double Tree Hotel
5400 Computer Drive
Westborough, MA 01581

You Must pre-register with VP@NERCSQA.org
For more information please visit our website www.NERCSQA.org

Updates from the Board

MaryEllen Lander, SQA VP & RCPC Chair

The SQA Board of Directors and the Regional Chapter Presidents Committee have agreed that the SQA Vice President shall write short articles for dissemination through Regional Chapter Newsletters or websites. The purpose of these articles is to summarize SQA Board activities that are relative to the Regional Chapters. The SQA Board minutes are posted on the SQA website but this article, provided quarterly, will hit the highlights of interest to Chapter members.

All of the regional Chapters are in the final stages of the administrative services transition effort. The SQA Board is excited about the opportunities this will provide to the Chapters and hopes that the Chapter members feel the same.

The Board is currently working on updating the Strategic Plan to assure it accurately reflects the current goals and objectives of the Society. Many of you on committees and specialty sections within SQA will have experience already with the Plan but if you haven't seen it before, there is a link on the SQA website. There are goals related to international relations and continuing development of our members that will be specifically addressed; look for more about these in future articles!

I also wanted to spread the word about the fall quarterly meeting in Las Vegas. The Pacific and Rocky Mountain Chapters are holding their annual meetings during this time, which will include a two-day schedule of trainings and seminars, followed by SQA and Chapter Board, Specialty Section and Committee meetings. The dates of the meeting are October 22-26, 2007; more information will follow from SQA Headquarters. I would encourage each Chapter to consider hosting one of the quarterly meetings in the future. It's a great way to get exposure for your Chapter and attendees appreciate the personal touches only a Regional Chapter can add.

Finally, please feel free to contact any SQA Board member with any comments, questions or concerns you might have regarding the Society. We are here to serve the membership and welcome any feedback you might want to provide. You can find our contact information (along with great pictures) on the SQA website.

April cGMP Training & Facility Tour

NERCSQA would like to thank **Genzyme** for their generous support and sponsorship of the April training event. This event had a total of 47 participants and included a only 1-day seminar program as well as a Facility tour. The following is a summary of the event.

On April 12th under the sponsorship of Genzyme, NERCSQA presented cGMP's: Today's Trends and Expectations. The program consisted of a tour of the Genzyme Waltham facility and featured guest speakers, Mark Goodsell; Director of Quality Assurance of Genzyme Drug and Biomaterial R&D, Larry Luba; Project Management NJ Compliance, IPS Validation Services, and Fran McAteer; Vice President of Quality at Microbiology Research Associates, Inc.

Mark Goodsell opened the meeting with a presentation on "**QA Expectations of the cGMP Facility Qualification Process.**"

The focus of the presentation was on the challenges of the merging of GMPs with Discovery Laboratories and scientists. Mr. Goodsell discussed the factors that, from a QA perspective, are necessary for the success of such an endeavor. These include:

- Internal audits
- Operations participation in the development of corrective actions
- The QA group taking on many non-QA activities
- Establishing a collaborative relationship with scientific experts

In addition the presentation further detailed the challenges, from the perspective of QA's responsibilities, of establishing a new facility with both GMP and development activities under one roof which included:

- Soliciting input from scientific operations
- Obtaining operations commitment
- Drafting documentation from a "top down" approach
- Maintaining compliance to site and corporate policies
- Addressing facility considerations including layout and construction materials
- HVAC, and water systems

The specifics of equipment qualification versus validation requirements for this type of facility as well as cleaning qualification versus validation were discussed in depth.

The take home message of this presentation was that planning is a vital component to success of any project however, even with a plan; circumstance may require changes to activities so flexibility as well as management of expectations is imperative.

Project Management of Facility Qualifications

Presented by Larry Luba:

Larry Luba discussed management of projects with a focus on time, cost and quality.
Specifically discussed was facility qualification: design, building construction, commissioning and qualification/validation

Ideally it was suggested that one should leverage commissioning as part of validation because waiting to execute on a validation plan toward the end of the project tends to increase costs.

The speaker clearly defined of the concept of management of a project versus a program as well as outlining how to evaluate new projects against predefined project objectives. He sited timelines in particular as sometimes being unrealistic because quality had not been factored into the equation. So while project managers are responsible for driving projects to completion as well as ensuring communication, rational planning of projects is necessary for success.

The take home message is that skilled project management is important both when projects run smoothly as well as when challenges and risks arise. No project manager can account for every circumstance, which might affect the project therefore time and project scope are factors that must also be managed closely.

Mr. Luba's second presentation dealt with a **Science and Risk Based Approach to Qualification: ICH Q8/Q9/Q10**.

During this presentation discussion centered on how companies should focus on the risk to patients based on their understanding of the product, the process, as well as the science because quality by design allows for regulatory flexibility so that changes can be made without involving regulatory authorities.

The focus is now on critical documentation rather than all documents such as:

- User requirements based on risk
- Quality plans
- Any other elements deemed critical

Since not all requirements are critical they need to be evaluated and categorized appropriately; commissioning and good engineering practices will take care of the rest.
Risk assessment which was previously laborious and done after the design is now done along with the design thus allowing qualification documents to be written by appropriate technical experts with QA approval.

Also discussed were highlights from the FDAs Pharmaceutical Quality Initiative, implementation of a modern risk based approach held in Washington DC which took place from Feb 28 – Mar 2nd 2007.

Getting the Bugs Out: The Ins and Outs of Facility Sanitization in a cGMP Environment

Presented by Fran McAteer:

Fran's, presentation was an overview of basic sanitization requirements.
The presentation included discussion regarding:

- A validation plan to prove the cleaning process and the sanitant's efficacy for the job at hand.
- Customizing the program to meet your needs. Does your process require a bactericidal, or would a sporicidal better meet your needs.
- Confirmation that any residue would not adversely affect your product or process.
- The importance of streamlined SOP's and proper training.

Aspects of use of sanitants on a rotating basis with other sanitants as well as problematic issues were also outlined. The general aspects of a sanitization programs, equipment used, contact times, frequency, pre and post environmental monitoring and operator training were also reviewed.

A key point was that being a global industry cleaning documents may need to be in different languages as the people using them may not have English as a primary language.
Also discussed was the cleaning flow, which should go clean to dirty including ceiling, walls, equipment and floors. Fran also noted that there has been a use of robotics in this area.

The take home message from this presentation was to justify your cleaning program to management: failure to be able to meet the demand for your product or a product recall are all highly undesirable factors.

Detailed transcripts from this meeting courtesy of Patience Miller and Theresa Donegan

BSE Modifications to Title 21

By: George Kuniholm

On January 12, 2007 the FDA issued draft modifications to 21 CFR Parts 211, 226, 300, 500, 530, 600, 895, and 1271 pertaining to cGMPs, Medicated Feeds, New Drugs, Animal Feeds, Extralabel drug use, Biologics, Devices, and Tissues titled "Use of Materials Derived from Cattle in Medical Products intended for Use in Humans and Drugs Intended for use in Ruminants; Proposed Rule"[1]. The modifications to these rules are intended to limit the possibility of transmission of Bovine Spongiform Encephalopathy (BSE) through Drugs, Biologics, Tissues, and animal Feeds (collectively called LifeScience technologies in this article) to either Humans or other Ruminants. The comment period for this proposed rule closed 13-March-2007 with expected finalization 14-May-2007 and expected effectively 14-June-2007.

The copy of the Federal Register provides a detailed account of the history and science of BSE in both the United States and worldwide and describes regulatory actions taken thus far taken to minimize its BSE presence in livestock. The rule examines methods by which LifeScience Technologies could possibly provide routes for transmission of BSE and related prion factors.

The proposed modifications to each of the rules all address the risk of transmission according to the ways in which cattle are processed. The proposed rule identified Specified Risk Materials – brain, spinal cord, and retina of cattle. By extension the skull, vertebral column and dorsal root ganglia are also considered Specified Risk Materials (SRMs) where the cattle is 30 months or older. In addition the distal ileum of the small intestine and tonsil are also included as SRM. The use of SRM is essentially prohibited in the manufacture of Life-Science Technologies however companies can request an exemption to allow SRM by specifically requesting the same from the Agency.

The following explanations give further elucidation of how the rule will be implemented in today's environment where cattle derived products are omnipresent. Mechanically separated beef, Nonambulatory Disabled Cattle, and Cattle not inspected and passed by the USDA (for human consumption) are explicitly prohibited. Fetal Calf Serum needs to be collected using procedures that segregate the calf carcass from the cow carcass to prevent biocontamination. Tallow (often used as an emulsifier in the production of plastics) is permissible to the extent that it does not exceed 0.15 percent. Tallow derivatives are permissible so long as it has undergone processing at high temperature or pressure. In vitro diagnostics do not have to be clear of SRM.

The proposed rule provides the exact textual modification to each of the rules. For the most part, the modifications provide the definitions of prohibited material, a statement prohibiting the use of prohibited material with reference given to the exception process, and record requirements which vary by the part affected by the proposed rule. Note that these record requirements will require LifeScience Technology firms to query their supply chain to ensure that they can product evidence that SRM is not used in their products. Firms that have already performed the queries to establish compliance with EMEA 410/01 Guidance on minimizing the risk of transmitting animal spongiform encephalopathy agents via human and veterinary medicinal products will still likely have to query their supply chains as the EU guidance focuses on selecting cattle from safe herds and not on SRMs.

The record retention requirements are 1 year following the expiration of drugs or 3 years following the last distribution of drugs that do not nave an expiration date, 2 years following the last distribution of medicated animal feed, the later of 6 months following expiration or 5 years following manufacturing of biologics, the anticipated life of a medical device but not less than 2 years following commercial distribution, and 10 years following the disposition of tissue based therapies.

The impacts on pharmaceutical firms will depend on the nature of the product, but may not be too extensive. Biotechnology and firms engaged in tissue culture will need to certify various source materials. Medical Device firms and critical component suppliers will be impacted in the use of tallow for plastic components. The author's firm is currently preparing an inventory of items that may be impacted and a plan for surveying the supply chain.

1. Department of Health and Human Services, Food and Drug Administration, ***Federal Register*** January 12, 2007 Pages 1582 to 1619

George Kuniholm is the Corporate Quality System Manager for Millipore Corporation

Conducting GLP Tests in GMP Laboratories

By: Linda Hook-D'Innocenzo, MS

On March 28, 2007 the FDA News aired a teleconference, which concentrated on the conduct of GLP studies in laboratories compliant in the cGMP regulations. Krisin Arpin, Quality Assurance expert for Purdue Pharma gave the presentation.

Ms. Arpin's, focus was directed toward strategies to mitigate the challenges companies would face if choosing to adapt this type of operational model.

Organizations typically consider the use of this operational model because of perceived cost savings, as there is an already established regulated laboratory environment, which with some "small" changes may provide an additional function to support perceived business needs. Perhaps the most difficult obstacle to surmount prior to implementation of the GLP compliant studies may be the simple lack of understanding of both the regulatory requirements for GLP studies as well as the fundamentally different philosophies that exists between the disciplines (cGMP vs. GLP). Therefore, in order for GLP studies to be successfully executed in this environment, establishing an "action plan" which adequately addresses these issues may mitigate any problems and/or staff related concerns or confusion.

The differences between the 2 disciplines (GLP vs. GMP) are based on the fundamental differences for which the regulations were first established. Some general considerations for adaptation of GLP to an established cGMP environment are to leverage the already established QA/QC staff partnership to manage the change, as well as provide in depth education on the regulatory requirements for GLP studies.

To conclude, managing this change is the key to success for this type of initiative. Of paramount importance is the need for a comprehensive education and training process for laboratory personnel, with a focus on the requirements surrounding GLP studies as well as articulating the differing role of QA within this process. As with many new situations resistance to change is typically the result of a lack of understanding of the rational for the change as well as any newly associated responsibilities. Clearly articulating those roles and responsibilities empowers staff by removing the "fear of the unknown."

Linda Hook-D'Innocenzo, MS manages Vertex Pharmaceuticals, Inc. Quality Assurance Audit Program for GCP and GLP.

REFERENCES:

- **March 28, 2007 FDA Audio-conference "Conducting Portions of GLP Studies in GMP Laboratories: Similarities, Differences, & Solutions**
- **Kuwahara, SS Good Laboratory Practice to Good Manufacturing Practice Transitions During the Product Development Process. J GxP Compl 2002; 7(1):13-19**
- **Roberge, K. Conducting Portions of GLP Studies in GMP Laboratories. Qual Assur J 2004; 8, 253-257**
- **Hume, E GMP and GLP: A Regulatory Comparison. SQA 20th Annual Meeting**

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Contact us at DirectorP@NERCSQA.org or visit us at www.NERCSQA.org

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New England Regional Chapter of SQA

BENEFITS OF MEMBERSHIP

As a member of NERCSQA, you will receive:

- Our periodic newsletter, *Northern Highlights,*
- A discount on training sessions
- An annual membership directory
- End of the year social following Members Meeting
- Opportunity to network with other Quality Assurance professionals.

JOIN TODAY!

Established 1996

CHAPTER INFORMATION

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NERCSQA Mission:

Serve as the focal point for Quality Assurance interests in Connecticut, New Hampshire, Maine, Massachusetts, Rhode Island, and Vermont.

Encourage interactions among Quality Assurance professionals in government, private industry, research/testing, and academia.

Provide and/or sponsor educational programs for the benefit of Quality Assurance professionals.