STATE OF FLORIDA
DEPARTMENT OF HEALTH
INVESTIGATIVE SERVICES
503b Outsourcing Inspection

File #
Insp #

NAME	PERMIT NUMBER	DATE OF INSPECTION	
DOING BUSINESS AS			
STREET ADDRESS		TELEPHONE #	EXT
CITY	COUNTY	STATE/ZIP	

Additional Information

Registered Pharmacist / Intern / Tech

Basic License Data - PSD

Business Operation Hours

License Relations

Pharmacy Affiliate

	License #
	License #
	License #

Special Sterile Compounding

	License #

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Quality - 21CFR part 211 subpart B

Firm has an independent Quality Control Unit.	
The QC unit has the authority and responsibility to approve or reject all components, drug product containers or closures, end process materials, packaging materials, labeling and drug products.	
QC unit reviews and approves/rejects: SOP's, Batch Records (completeness and accuracy, components, API's, materials, OOS results).	
QC unit reviews production records to assure that no errors have occurred, or if errors have occurred, that they have been fully investigated.	
Adequate laboratory facilities for the testing and approval (or rejection) of components, drug product containers, closures, packaging materials, in-process materials, and drug products are available to the quality control unit.	
The quality unit approves or rejects all procedures or specifications impacting the identity, strength, quality, and purity of the drug product.	
The responsibilities and procedures applicable to the QC unit are in writing and such procedures are followed.	
QC unit personnel are qualified through training and experience.	

Investigations

The QC Unit conducts a written and thorough investigations of any unexplained discrepancy, deviation, equipment malfunctions, and OOS (including a percentage of theoretical yield exceeding the maximum or minimum percentages established in master production and control records) or the failure of a batch or any of its components to meet any of its specifications whether or not the batch has already been distributed.	
Investigations are conducted within time limits specified per SOP.	
When investigations are not conducted, the written records include the reason the investigation was not deemed to be necessary and the name of the person that made that determination.	
Investigations are extended to other batches that may have been impacted by a failure or discrepancy.	
Investigations include findings, conclusions and follow up.	
Record of investigations are maintained at the establishment where the investigation occurred.	

Personnel Qualification - 21CFR Subpart B

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All personnel involved in the processing, packing, or holding of a drug product have the education, training and experience to enable the person to perform the assigned functions.	
Facility has a written training program that describes the required training, frequency of training and process for evaluating the performance of individuals involved in compounding.	
Facility has documentation that compounding personnel have the required skills necessary to perform their assigned functions.	
Prior to beginning to prepare CSP's personnel have completed training and have demonstrated proficiency in the principles and hands on skills of aseptic manipulations.	
CGMP trainers are qualified through experience and training.	
Personnel receive ongoing periodic CGMP training by qualified trainers for the specific tasks they are authorized to perform.	
Personnel are qualified for the number of units they can compound and the processes they perform.	
Prior to beginning to prepare CSP's personnel have completed training and have demonstrated proficiency in the principles and hands on skills of aseptic manipulations.	
Personnel have been periodically trained in core competencies, visual observation is conducted to confirm personnel have necessary skills (i.e. Hand hygiene and garbing, aseptic manipulations, cleaning and disinfecting).	
Personnel sampling including GFT is conducted after compounding and documented on each batch record.	
Personnel have completed media fill simulations for all aseptic compounding processes under the most difficult and challenging conditions which include the most manipulations/units, most complex flow of material, longest time to compound and all breaks and interventions.	
Personnel are retrained and requalified after failure of media fill, GFT or batch failures.	
Firm has adequate written procedures for visual inspection.	
Personnel conducting visual inspection of the final product have been qualified through training in applicable SOPs and have annual eye exams.	
Personnel conducting visual inspections have been qualified for the number of units and amount of time they can inspect before taking a break.	
Significant defect categories are identified in the SOP and personnel conducting visual inspection have demonstrated competency in identifying common defects.	
Persons supervising the manufacture, processing, packing or holding of a drug product have the education, training, and experience to perform assigned functions in a manner to provide assurance of the safety, identity, strength, quality and purity of the drug product.	
Employees are required to report to their supervisor any health issues that might impact the quality, safety and purity of the product.	
Temporary employees are given the same orientations as permanent employees.	
The firm has records stating the name, address, and qualification of all consultants and the type of service they provide.	
Documentation of training personnel on use of equipment.	

Facilities and Equipment - 21CFR part 211 subpart C and subpart D

The facility design is suitable for compounding sterile products.	
The facility is designed to allow adequate flow of components, drug product containers, closures, labeling, in-process materials and drug products through the building to prevent contamination.	
The facility has the space, construction, and location to facilitate cleaning, maintenance, and proper operation.	
There is adequate space for the orderly placement of equipment and materials to prevent mixups between different components, containers, closures, labeling, in-process materials, or drug products and to prevent contamination.	
Facility had adequate space to quarantine incoming components, drug product containers, closures, and labeling pending the sampling, testing or examination by the quality control unit prior to release.	
Facility has space to hold rejected components, container, closures and labeling prior to disposition.	
There is a separate, defined area for quarantine storage before release of drug products.	
Compounding of hazardous drugs is clearly separated from non-hazardous drugs to prevent cross contamination.	
Beta lactams are separated to prevent cross contamination with other drug products.	
Certifications of primary and secondary engineering controls are current and are conducted under dynamic, worst case conditions with the maximum number of personnel allowed per SOP present.	
All HEPA filters are leak tested.	
Visual smoke studies have been conducted under operational conditions to demonstrate laminar flow air in all primary engineering controls.	
Floors, walls and ceilings and other structures are smooth and easily cleanable.	
Ceiling tiles are clean room grade and gasketed and sealed/clipped.	
Air return vents are not blocked and are placed in a manner that allows adequate dilution of HEPA filtered air to prevent airborne contamination.	
The control of air pressure, dust, humidity and temperature is adequate for the manufacturing, processing, storage or testing of drug products.	
Pressure gauges that monitor pressure differentials are calibrated.	
The facility is maintained in a clean and sanitary condition.	
The facility has written procedures that describe in sufficient detail the cleaning schedule, methods, equipment and materials used in cleaning the facilities. Procedures are followed.	
The firm has an SOP for controlling rodents, birds, insects and other vermin. Pest control contracts specify which pesticides can be used. Procedures are followed and documented.	
The facility has a procedure for rotating cleaning solutions and documents in the cleaning record.	
Sporicidal agents are used . How often?	

The facility has validated the effectiveness of the cleaning solutions.	
All equipment has written procedures for use.	
Written procedures and schedules are established and followed for cleaning and maintenance of equipment and utensils used in the manufacture, processing, packing, or holding of a drug product.	
Surfaces that contact components, in-process materials, or drug products are not reactive, additive, or absorptive so as to alter the safety, identity, strength, quality or purity of the drug product.	
Ovens and autoclaves have been temperature mapped, the cycles have been validated, and are monitored with calibrated thermometers.	
Autoclaved cycles are verified with BI's.	
Depyrogenation cycles have been validated with ECVs and demonstrates a 3 log reduction in endotoxin units.	
All equipment is validated for its intended use.	
Refrigerators and freezers are monitored with calibrated thermometers.	
Written SOPs for changing the filters and prefilters of all engineering controls are established and followed.	
Appropriate controls over computer or related systems assure the changes in master production and control records are made by authorized personnel only.	

Environmental Monitoring - 21CFR 211 - Subpart F

Facility has an environmental monitoring program.	
Air quality is monitored regularly using volumetric air sampling to ensure the environment remains suitable for sterile compounding.	
Settling plates are used during compounding to monitor the quality of air during compounding processes and documented in the batch records.	
Non-viable particle counts occur during operations in areas most at risk to exposed product, containers and closures.	
Surface sampling is conducted after each batch prior to cleaning and documented on batch records.	
Surface sampling is routinely conducted in all classified spaces in those locations identified to be at highest risk of contamination.	
Surface sampling is conducted in critical areas that are in contact with products, containers or other components used in compounding.	
Media used in environmental and personnel monitoring has been shown to promote the growth of microorganisms and contains agents to neutralize cleaning solutions and disinfectants.	
Sampling data is collected and reviewed on a periodic basis as a means of evaluating the overall state of control of the compounding environment.	
Environmental Monitoring Data is trended to support the adequacy of clean room quality.	
Adverse changes in the environment are investigated and promptly remediated.	
Alert and action levels for CFU counts have been established in SOP's for the facility.	
Air pressure differentials are continuously monitored and demonstrate that a cascading pressure differential is maintained throughout the compounding area during production of sterile compounding. Alarms and deviations are documented, investigated, and remediated.	

Control of Components, Containers and Closures 21CFR part211 Subpart E

Facility has a quality agreement with API suppliers to ensure all API's are manufactured in registered FDA facilities.	
Written procedures describe with sufficient detail the receipt, identification, storage, handling, sampling, testing, and approval or rejection of components and drug product containers and closures. Procedures are followed.	
Components and drug product containers and closures are handled and stored, at all times, in a manner to prevent contamination.	
Bagged or boxed components of drug product containers or closures are stored off the floor and suitably spaced to permit cleaning and inspection.	
Components, containers and closures are stored under quarantine until they have been sampled, tested or examined and released for use by the quality control unit. Each lot of components, containers and closures is appropriately identified as to its status (quarantined, approved, or rejected).	
Each component is tested for conformity to written specifications for identity, purity, strength and quality. Supplier analysis may be accepted provided that at least one specific identity test has been conducted by the firm and the firm has established the reliability of the supplier's analysis through validation of supplier's test results at appropriate intervals.	
Containers and closures are tested for conformity to written specifications. A certificate of testing from the supplier is acceptable if the reliability of the suppliers' test results is established and at least a visual identification is conducted by the firm.	
Each lot of component with potential for microbiological contamination are subjected to microbiological tests before use.	
Components, drug product containers and closures approved for use are rotated so that the oldest approved stock is used first. Deviations from this are temporary and appropriate.	
Drug product containers and closures are not reactive, additive, or adsorptive so as to alter the safety, identity, strength, quality or purity of the drug.	
Firm has written specifications, methods of testing if indicated, methods of cleaning, sterilizing and depyrogenating drug product containers and closures.	
Facility has a system in place to ensure final drug product containers, closures and stoppers are endotoxin free. Failures are investigated and documented.	
Written procedures include material transfer from less classified air to higher classified air and include procedures to sanitize materials prior to introduction into the clean room.	
Facility has appropriate sterile PPE.	
Materials for cleaning the PEC's are sterile.	
Filters used for sterilization have documentation that they are compatible with the product, are pharmaceutical grade, non-pyrogenic and capable of sterilizing the intended volume.	
Written procedures identify storage times beyond which materials must be reexamined before use.	
Release of re tested material clearly identified for reuse.	

Production - 21CFR part 211 subpart F

There are written procedures for production and process controls to assure the drug products have the identity, strength, quality, and purity they purport to possess. Procedures are followed. Deviations are recorded and justified.	
Components removed from the original container to another are properly labeled.	
Weighing, measuring, or sub-dividing of components is supervised. Each container of component dispensed to manufacturing is examined by a second person.	
Each component added to the batch is verified by a second person unless added by automated equipment under 211.68.	
Actual and theoretical yields are determined at each production phase and are verified by a second person. If yields are calculated by automated equipment, verification is done by one person.	
Written procedures indicate how and who verifies that correct containers and packages are used for the finished product.	
In-process specifications have been established and followed for each production phase to ensure uniformity of drug product.	
Control procedures include disintegration time, adequacy of mixing, dissolution times and rates where appropriate.	
Quality control unit approves or rejects in- process materials that are tested during the production process after completion of significant phases of production.	
Time limits are established for the completion of each production phase; Deviations are justified and documented.	
Sterilization methods are validated.	
SOP's identify hold times for depyrogenated glassware and the hold times have been validated.	
Integrity testing is conducted on all filters used to sterilize product and is documented on the batch record.	
Products prepared for lyophilization are maintained in ISO 5 laminar flow air throughout the production process from sterilization, filling, and transport to the lyophilizer.	
There are an adequate number of personnel to supervise the manufacture processing, packing, or holding of each drug product.	
All finished products are held in quarantine until QC has completed testing and releases the batch.	
A 100% inspection of finished sterile products for cracks, visible particles and significant defects is performed.	
Firm has written procedures that define the defects to be removed from the lot and actions to take if the number of critical defects exceeds the pre-determined level.	
Firm has a program for sampling and examination of inspected products that evaluates the effectiveness of inspection.	

Packaging and Labeling - 21 CFR part 211 subpart G

Written procedures describe the receipt, identification, storage, handling, examination and/or testing of labeling and packaging material. Procedures are followed.	
Written procedures describe control procedures employed for issuance of labeling. Procedures are followed.	
Written procedure specifies who is authorized to issue labels and strict control is exercised over labeling operations.	
Records are maintained for each shipment received of each different labeling material indicating receipt, examination/testing, and whether accepted or rejected.	
Labels and other labeling materials for each different drug product, strength, dosage form, or quantity of contents are stored separately and properly identified.	
Access to label storage area is limited to authorized personnel.	
Obsolete and outdated labels, labeling and packaging materials are destroyed.	
Unlabeled drug filled product containers intended for future labeling are identified with drug name, strength, quantity and lot number.	
Written procedure specify how labels are issued, used, reconciled with production, returned when unused, and the specific steps for evaluation of any discrepancies.	
Written procedures call for the destruction of excess labeling on which lot and control #'s have been stamped or imprinted.	
100% Visual inspection is conducted for correct labeling during or after completion of finishing operations for hand applied labeling. Such examination is performed by one person and independently verified by a second person. Or use of electronic equipment to conduct 100% examination.	
Procedures are established and followed to assure that correct labels, labeling, and packaging materials are used.	
Procedures are designed to prevent mix-ups and cross-contamination by physical or spatial separation from operations on other products.	
Written procedures detail examination of packaging and labeling materials for suitability and correctness and is documented on the batch record.	
Drug labels include the statement "this is a compounded drug, the name, address and phone # of the facility.	
The label of the drugs contains the lot or batch #, the established name of the drug, dosage form and strength, quantity or volume, the date the drug was compounded, the expiration date, storage and handling instructions, NDC # (if available), the statement "not for resale" and "For Office Use Only," and a list of active and inactive ingredients identified by established name and the quantity or proportion of each ingredient and route of administration.	
The label or container contains the following: www.fda.gov/medwatch and 1-800-FDA-1088.	
Written procedures detail how equipment is to be checked immediately prior to use for removal of any labels, labeling, and packaging material from prior print operations and is documented on the batch record. Procedures are followed.	

Holding and Distribution 21CFR Part 211 Subpart H

Written procedures describing warehousing of drugs include quarantine of drug product before release by QC unit, storage under appropriate temperature, relative humidity, and light.	
Procedures for the warehousing of drugs are followed.	
Written procedures include FIFO of product distributed and a system whereby product can be recalled.	
The firm has conducted shipping studies to confirm that drug products can be shipped without negatively impacting the safety, identity, strength, quality and purity of the drug product.	

Laboratory - 21 CFR part 211 subpart I

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Contract labs are FDA registered.	
Facility has qualified their contract labs.	
Laboratory specifications, standards, sampling plans and test procedures are approved by Quality Unit; deviations from written specifications are recorded and justified.	
All laboratory procedures are followed and documented contemporaneously.	
Laboratory controls include procedures designed to assure that components, containers, closures, drug products, and in-process materials, conform to appropriate standards of identity, strength, quality and purity.	
Instruments, apparatus, gauges, and recording devices are calibrated at suitable intervals in accordance with an established written program.	
Stability tests are derived from reliable, meaningful and specific tests methods and justify the assigned BUD of each drug product.	
There is a written program to assess the stability characteristics of each product. The program includes sample size and test interval, storage conditions, and testing the drug product in the same container closure system in which the product is distributed.	
Lyophilized products have stability data for both before and after reconstitution.	
Facility has approved finished product specifications for all CSPs.	
All batches of drug products have undergone appropriate laboratory testing to determine conformance to specifications.	
Procedures describe sampling and testing plans and include method of sampling and the number of units per batch to be tested.	
Acceptance criteria for sampling and testing conducted by the quality control unit are adequate to assure that batches of drug products meet appropriate specifications.	
Drug products failing to meet established specifications or any other relevant quality control criteria are rejected.	
Stability studies, microbial effectiveness testing on the preservative, container closure studies and sterility testing have been conducted to ensure the CSP continues to meet all specifications over the intended shelf life of the product.	
Sterility testing for all batches is conducted using a USP 71 test or a validated alternate test that is proven equivalent or superior to the USP<71> test.	
Sterility tests for products requiring reconstitution are conducted using preservative free diluent.	
Method suitability has been conducted for all products.	
Endotoxin testing is conducted on all batches.	
Potency is conducted on all batches.	
Appropriate # of articles/volume is tested for sterility.	
The accuracy, sensitivity, specificity, and reproducibility of test methods are established and documented; failures are rejected.	
A reserve sample, representative of each lot or batch of drug product, is retained and stored under conditions consistent with product labeling and in the same container-closure system for 1 year past the BUD of the drug product.	

Records and Reports 21CFR Part 211 subpart J

All records associated with a batch, including records of containers, closures and labeling are retained for at least 1 year after expiration of the batch. Records related to product distributed into the state of Florida are retained 4 years.	
Written records are maintained so that data can be used for evaluating, at least annually, the quality standards of each drug product. Procedures include a review of complaints, recalls, and investigations for each drug product, and include a representative number of batches, whether approved or rejected.	
Records of maintenance, cleaning, sanitizing, inspection and use of major equipment are kept and show the date, time, product, and lot number of each batch produced.	
Logs are signed or initialed and dated by persons performing and double checking the cleaning and maintenance of equipment. Entries are in chronological order.	
All components, containers, closures, and labeling are identified on batch records and traceable to the finished product.	
Master production and control records for each drug product are prepared and include batch size, name and strength of product, dosage form, name and weight of each ingredient, complete list of all components, statement of theoretical yield, % deviation from theoretical yield that requires an investigation, description of containers, closures and packaging materials, specimen of labels, complete manufacturing and control instructions, sampling and testing procedures, product specification, special notations and precautions to follow.	
Master production and control records are prepared, dated and signed with a full signature by one person and independently checked, dated and signed by a second person.	
Batch Production and Control records are accurate and complete.	
Batch records include documentation that each significant step was accomplished and includes date and time.	
Major equipment is identified on the batch record.	
The identity of each person performing, supervising, or checking each step is documented on the batch record.	
The firm has an SOP for product release. The production batch and control records, including those for packaging and labeling, are reviewed and approved by the quality unit to determine compliance before a batch is released or distributed.	
Complete records of any modification of an established method used in testing are maintained.	
Records of calibration for laboratory equipment and gauges are maintained.	
Distribution records contain the name, strength, description, dosage form, lot number, quantity of the drug product and the date shipped as well as the name and address of the consignee.	
Firm has written procedures for handling all complaints which include provisions for review by the quality control unit. Procedures are followed.	
A written record of each complaint is maintained in a file designated for drug product complaints. Records are maintained at the establishment where the drug product was manufactured, or if kept at another facility, are readily retrievable.	
Records of complaints include the name, strength and lot number of the drug as well as the name of the complainant, nature of the complaint and response to complaint.	

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The firm maintains separate, complete and readily retrievable records of distribution into the state of Florida.	
The firm has SOPs for adverse event reporting to the FDA.	
Firm has record of adverse event reports submitted to FDA.	
ADEs are adequately reported to FDA. Reasons for not reporting an ADE are documented.	

Remarks:

I have read and have had this inspection report and the laws and regulations concerned herein explained, and do affirm that the information given herein is true and correct to the best of my knowledge.

Inspector Signature

Representative:

Date:

Date: