APPLICATION-RELATED INSPECTIONS

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AGENDA

- FDA Inspection Authority
- Types of Application-Related Inspections
- What to Provide in an Application to Prepare for an Inspection
- What to Expect Before an Inspection
- Inspection Objectives
- Initiating an Inspection
- Inspection Close-out
- Resources

FDA INSPECTION AUTHORITY

Section 704(a) of the FD&C Act:

- Factories, warehouses, establishments, vehicles.
- All pertinent equipment, finished and unfinished materials, containers, and labeling.

Inspections are performed by:

- Office of Regulatory Affairs (ORA)
  - Tobacco Operations Staff
- Center for Tobacco Products (CTP)
  - Representatives from the Office of Compliance & Enforcement (OCE)

TYPES OF APPLICATION-RELATED INSPECTIONS

Manufacturing (Establishment) Inspections:

- Establishments associated with the manufacture, testing, or storage of the tobacco product(s) subject of the application(s) submitted to the Agency.
- Should be inspection-ready at the time of application submission.

Bioresearch Monitoring (BIMO) Inspections:

- Sites and entities associated with clinical and nonclinical studies submitted in support of the premarket application(s) submitted to the Agency.

Inspections may be performed domestically or internationally.

- Form FDA 482, Notice of Inspection will be issued during domestic inspections.

WHAT TO PROVIDE IN AN APPLICATION TO PREPARE FOR AN INSPECTION

FDA

Manufacturing Inspections:

- A full description of each manufacturing and testing facility:
  - Address, point of contact, and assigned Firm Establishment Identifier (FEI) number.
  - A full description of all manufacturing and testing activities, processes, and controls performed at each facility.
  - A narrative description, accompanied by a list and summary of all standard operating procedures (SOPs).
  - If available, production schedule(s) for each of the final manufactured products subject to the application(s) for the first four months after the dates of the submission of your application(s).

WHAT TO PROVIDE IN AN APPLICATION TO PREPARE FOR AN INSPECTION

FDA

Bioresearch Monitoring:

- List of all clinical / nonclinical studies submitted in support of an application.
- List of all sites and investigators that conducted the study.
- All versions of protocols and amendments that were used in the study.
- Line data.
- Location of all source data.
- List of all contractors who participated in the study.
- Full report of all findings.

WHAT TO PROVIDE IN AN APPLICATION TO PREPARE FOR AN INSPECTION

FDA

Bioresearch Monitoring:

- Documentation of all actions taken to ensure the reliability of the study data and protection of human subjects.
- All versions of study materials.
- All versions of case report forms.
- Individual subject case report forms.

WHAT TO EXPECT BEFORE AN APPLICATION-RELATED INSPECTION

FDA

Pre-Inspection Notification:

- Manufacturing Inspection(s)
- BIMO Inspection(s)

Purpose of Pre-announcing:

- To notify the applicant/sponsor/investigator what sites are planned for inspection.
- To provide information to prepare the appropriate documentation for the inspection.
- Note that documents other than what was requested in the inspection pre-announcement may be requested during the inspection.

INSPECTION OBJECTIVES

- Review processes and procedures.
- Observe and evaluate operations (manufacturing only).
- Document and collect information.
- Identify violations.
- Communicate potential violations to firm management.
- Document any proposed corrective action plans.

INITIATING AN INSPECTION

- Meet with most responsible person on site.
- Present FDA credentials.
- Issue Form FDA 482, Notice of Inspection.
  - domestic inspections only.

WHAT IS COVERED DURING AN APPLICATION-RELATED INSPECTION

Manufacturer Inspection	BIMO Inspection
• Administrative information • Facility walk-through • Observe the manufacturing process • Review of packaging, labeling, and advertising	• Human subject protection • Protocol compliance • Data audit

INSPECTION CLOSE-OUT

What happens:

- Close-Out discussion.
- Discuss observations with management.
- Issue Form FDA 483, if necessary.
- Solicit firm's responses to observations.

INSPECTIONS – FINAL REPORT

Establishment Inspection Report (EIR):

- Describes the information discussed and collected during the inspection.

Field Management Directive 145:

- Copy of EIR to inspected entity.
  - Sent to most responsible individual identified during the inspection after decision has been made on the application(s).

FDA RESOURCES AND CONTACT INFORMATION

CTP Website:

- http://www.fda.gov/TobaccoProducts/default.htm

CTP Webinars:

- https://www.fda.gov/tobaccoproducts/guidancecomplianceregulatoryinformation/ucm220111.htm

For General Inquiries, contact via email or phone:

- AskCTP@fda.hhs.gov
- 1-877-CTP-1373

Sign up for updates:

- https://www.fda.gov/tobacco-products/ctp-newsroom/sign-email-updates-ctp

Investigations Operations Manual (IOM):

- https://www.fda.gov/iceci/inspections/iom/default.htm

Regulations: Good Clinical Practice and Clinical Trials:

- https://www.fda.gov/science-research/clinical-trials-and-human-subject-protection/regulations-good-clinical-practice-and-clinical-trials

Reporting Complaints Related to FDA-Regulated Clinical Trials:

- https://www.fda.gov/science-research/clinical-trials-and-human-subject-protection/reporting-complaints-related-fda-regulated-clinical-trials