The Biogen Idec Approach to Managing Corrective and Preventive Action

- Internal
- External

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Strategies for CAPA Management

- Components for CAPA Success
- How does it work in Cambridge?
- Applying CAPA to the Contract World
- Review some contractor case studies

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Review of CAPA; Components for Success

- Strong Investigation Program
- Sr. Management Support
- Accurate Status Tracking
- Metrics Reports & Forum for Review

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Strong Investigation Program

- Investigating to true root cause leads to effective CAPA
- Use multi-discipline investigation teams
- Timely follow up (30 day target)
- Tools in the Toolbox
  - **Brainstorming**
  - **Data Gathering**
  - **Repetitive Why**
  - **Cause-Effect Diagram**
  - **Interviews**

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Sr. Management Support

- Sets tone for commitment to CAPA
- Accountability of managers & operators
- Quality Assurance should not be the only driver
- Provide resources for CAPA: personnel, equipment, schedule modifications

Accurate CAPA Status Tracking

- Allows for progress tracking and ensures closure
- Provide basis for reporting metrics and cycle time calculations
- Quality maintained
- Linked to exceptions, searchable

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Metrics and Trending

- Need to identify system measures that provide key information on system status and effectiveness
  - **Focus on cycle time for closure, such as no. overdue by >30 days, >60 days, etc.**
  - **CAPA “type” such as Document, Retraining, or Equipment Modification**
  - **Trend by department to highlight issues**
  - **Metrics reported monthly**

Forum For CAPA Status Review

- Multi-level, interdepartmental team
- Formed to critically review exceptions and associated CAPAs
- Routine meeting, led by QA or Ops
- Summary reports with status provided by QA

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Biogen Idec CAPA Management in Cambridge

- Strong Investigation Program
  - **KT Structured Problem Solving**
  - **ASQ Problem Solving *Toolbox***
- Sr. Management Support
  - **Participate in all CAPA review forums**
  - **Challenge teams to think out of the box**
- Accurate Status Tracking
  - **Trackwise for CAPA Management**
  - **Auto-reports, searchable, paperless**

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Biogen Idec CAPA Management in Cambridge *cont.*

- Metrics Reports - Cambridge Quality Monthly Report
  - **Review of all key site metrics**
  - **Includes CAPA cycle times, no. closed in period, overdue CAPAs by department, etc.**
- Forum for Review
  - **Weekly Exceptions Meeting (*next slide*)**

Cambridge Weekly Exceptions Mtg

- Each new deviation filed since last mtg is reviewed
- Area mgr. provides description of exception, investigation update, and proposed CAPA….informal
- Reps from all departments participate
- Be aware of CAPA trends: “retraining” or “document changes”

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Managing CAPA in Contract Manufacturing

- The Biogen Idec contract management model: SQM and COM
- Why Do You Need to Manage Contract CAPA?
- Different Rules and Different Tools; Contact Manufacturing CAPA Toolbox

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The Biogen Idec Contract Management Model

- Supplier Quality Manager and Contract Operations Manager oversee contract
- SQM oversees product disposition activities, Change Control, BPR review, metrics
- COM handles contract/logistic issues, investigation lead, CAPA development

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External CAPA Management System

Why?

- Compliance needs; both contractor and product owner accountable
- Business needs- $$ benefit for both
- Continuous improvement

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Different Rules and Different Tools

One of a number of customers….

- Quality Agreement and Legal Contract
- Partnering-Collaboration-Negotiation
- Product specific Metrics…DATA
- Management Team Meetings
- Sr. Management Reviews - Quarterlies

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Tool: Quality Agreement

- Comprehensive document approved by key department heads of both companies
- Generated by Biogen Idec
- Includes:
  - **Responsibilities**
  - **Material Mgt**
  - **Exceptions and CAPA handling**
  - **Change Control**
  - **Batch Disposition**

Tool: Partnering-Collaborating-Negotiating

- The primary “tool” for success
- Fosters more candid communication
- Allows co-development of investigation paths and CAPA avenues
- Use metrics data to support position
- Built on mutual respect

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Tool: Metrics

- Most contractors maintain limited metrics
  - **deviations per batch, yield, some cycle times**

- Product owner must maintain product specific metrics
  - **Deviations per batch**
  - **Recurring deviations**
  - **Defects**
  - **In-process QC**
  - **Yield**
  - **Cycle times**
  - **GMP Issues**

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Tool: Management Team Meetings

- Routine team meetings
- SQM, COM, Area mgrs, operators participate
- Standing Agenda
  - **Deviation and investigation status review**
  - **CAPA closure status**
  - **Metrics & trend review, <u>proactive not reactive</u>**

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Case Studies

- Responding to In-process QC Assay Variability
- Capsule reconciliation issues: small lot, clinical product, limited contract

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Responding to In-process QC Assay Variability

- Issue: Contract filler with ~13% avg variability from expected protein conc.
- Intra-company, multi-discipline investigation team formed
- Outcome:
  - **Re-transfer assay to contractor**
  - **Establish SMEs, Qualification program**
  - **Check other assays/contractors**

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Capsule Reconciliation Issues

- Issue: Noted during repackaging protocol; Capsule counts did not reconcile
- Investigation revealed in-process checks based on bottle weight inaccurate
- CAPA: Contractor systems need revision to accommodate small scale mfr, verify closure at next start-up

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