

Investigation of Sterility Test Failure

Investigation # _____

Part 1. Batch Information:

Product Name: _____ Product Code & Batch #: _____
 Date of Manufacturing/Filling: _____ Filling Machine: _____
 Container and Closure: _____ Filling Room: _____

Part 2. Description of Test Failure & Possible Root Cause:

Notification of QA: Who was notified/Date & Time _____

Part 3. QC Test Data

Date of Test: _____ Test Room: _____
 Technician: _____ Test Method #: _____
 Results Date & Time: _____
 Negative Control: _____ Manipulative Control: _____
 Media Growth Promotion: _____
 Media Type & Batch #: _____
 Media Expiration Date: _____
 Number of Positive Units: _____ Organism(s) identified: _____

Environmental Results During Test: Viables- Air- _____
 Surface- _____
 Personnel Monitoring- _____

Viable Organism Identification (Note which sample):

Non-Viable Counts: _____

Is the first sterility test invalid? Yes/No, and if yes, explain

Get QA Approval for Retest: _____

If it is invalid, get retain samples for a repeat sterility test: _____

Repeat Test Results: _____

Part 4. Review of QC Data & History:

Data/History	Comments	Reviewed By/Date
Sterility Isolate found elsewhere in lab?		
Technician comments?		
Test Deviations?		
Review of Cleaning/Disinfection of Sterility Test Suite & Exp. Date of Disinfectants		

Review of sample handling/Chain of Custody		
False Positives in testing or Controls?		
Other batches positive if tested the same day?		
Review of C of A's for materials, filters, solutions		
Certification of HEPAs, LF or Isolation Unit		
Review of Sterilization Cycles for equipment		
Technician Training & Qualification Record		

Written By (QC Staff)/Date: _____

Approved By (QC)/Date: _____

Part 5. Quality Assurance Review of Manufacturing/Filling:

Review interventions during filling of the batch: _____

Review of Media Fills (12 months): _____

Review Deviations/Investigations/Interventions for this batch:

Review History of Deviations and Investigations for product: _____

Review of Sterility or Environmental Positives with Same Isolate: _____

Filling Room Environmental Monitoring Results:

Sample	Location	Results
Viables- Air		
Viables- Surface		
Viables-Personnel*		
Non-Viables **		

*Note Activity of Person prior to taking sample exiting room. Review previous excursions for same person in last 6 months.

**If possible, isolate source by using portable particulate monitor.

Attach Review of Manufacturing (Compounding) and Filling Activities by Production Personnel Include:

Bioburden/ Filter Integrity for Aseptic Products

Sterilization Cycle for Terminally Sterilized Products
Disinfection of Areas
Raw Material/Component Tests and Handling
Utility Tests

List Batches to be placed on hold:

Written By/Date: _____

Approved By/Date: _____

Part 6. Risk Based Assessment:

Explain if non-viable or viable count (EM results) could potentially impact the sterility of the product. _____

Dosage Form of the Product: Injectable _____ Ophthalmic _____ Topical _____

Sterility Test Organism _____

Possible sources of specific organism recovered _____

Other dates specific organism was recovered and location (e.g., EM monitoring in Sterility Testing Suite or Aseptic Filling Room) _____

List specific deviations or interventions during batch filling: _____

Is the product capable of sustaining growth of the organism? _____

Is there more sampling that needs to be done to find root causes?
Describe _____

List possible root causes. _____

What is the most probable root cause? _____

Are experiments needed to confirm? _____

Written By/Date: _____

Approved By/Date: _____

Part 7. Final QA Assessment:

Corrective Action: What should be an immediate action? How should batch disposition be impacted? _____

Preventive Action: What needs to be done to prevent a recurrence of the event?

Follow-up to ensure effectiveness of actions _____

Written By/Date: _____ Approved By/Date: _____

QA notes/Batch Disposition Decision: _____

QA approval/Date: _____