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
Review of CAPA; Components for Success

- Strong Investigation Program
- Sr. Management Support
- Accurate Status Tracking
- Metrics Reports & Forum for Review
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
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
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
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
• 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”
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
The Biogen Idec Contract Management Model

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

Why?

• Compliance needs; both contractor and product owner accountable
• Business needs- $$ benefit for both
• Continuous improvement
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
Tool: Quality Agreement

- Comprehensive document approved by key department heads of both companies
- Generated by Biogen Idec
- Includes:
  - Responsibilities
  - Change Control
  - Material Mgt
  - Batch Disposition
  - Exceptions and CAPA handling
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
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
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, proactive not reactive
Case Studies

• Responding to In-process QC Assay Variability

• Capsule reconciliation issues: small lot, clinical product, limited contract
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
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