While the FDA are the regulatory body, there is actually no legal requirement to respond to a Form 483 inspection report.

According to the FDA’s own website, a form 483 report records “inspectional observations, and do not represent a final agency determination regarding your compliance.”

It all sounds quite benign, but the consequences and ramifications can be serious and a timely, proper, structured and formal response is crucial to avoid further investigation. Furthermore, it is fact that all warning letters are posted on the FDA website, in html format.

This means that, once you receive a Form 483, the details of your non-compliance are very much in the public domain through a quick search on Google.
Guidelines for a meaningful response to an FDA 483 inspection report

Here is a simple checklist of items suggested to generate a formal and authoritative response to a Form 483 report from the FDA:

**Timely Response**
You have been allowed 15 days to respond, so use them effectively. Ensure that all the relevant details are gathered in time to meet the needs of final editing and despatch to ensure delivery within the allocated timeframe. This probably implies that you only really have 10 days to collate the information.

**Accept and move on with Positivity**
Demonstrate a thorough understanding of the FDA regulations and communicate a positive will to comply with their “inspectional observations” – make this statement the opening lines of your response.

**Specific Responses to Specific Issues**
Take each item identified by the FDA in their warning letter line by line and detail a reasonable response to meet compliance to each one and be specific. Experience would indicate that to try to solve all issues in a couple of paragraphs seriously risks rejection, and further action from the FDA.

**Prioritise Quality Improvement**
Ascribe greater priority in your response to items most likely to impact product quality.

**Detailed Corrective Action**
Detail specifically the corrective action to each deficiency, including timescales for implementation as opposed to explaining how the problem occurred. The FDA is only interested in how and when the issue will be fixed.
If appropriate, provide written documentary evidence of the responsible department’s commitment to each corrective action.

**Be Positive**
Address each item in the form 483 using language that is pro-active in a way that fine-tunes the departmental quality and compliance protocols and do not ascribe fault or blame.

**Include New System Protocols**
When detailing specific remedies, such as automation, that support the corrective action on a long-term basis, include product specifications of each and any new system to be implemented.

**Re-Evaluate Internal Systems**
To be a victim of a Form 483, there was something fundamentally wrong with internal process so internal compliance protocols and systems need to be fully re-evaluated.
The inspector was able to identify compliance issues to raise a form 483; why were these issues not detected already? If in doubt, the FDA’s IOM (Investigations Operations Manual) can be found on their website http://www.fda.gov/ICECI/Inspections/IOM/default.htm and this details what the inspectors are looking for.

Highlight your reappraisal processes in detail in the response letter, reinforcing your organization’s commitment to QC/QA management.

**Support Claims of Isolated Deficiencies**
If the during the inspection, you feel that the inspector has picked up on an isolated incident reported, document this fact at the time and refer to it in your response but be very sure that your supporting data is complete, accurate and repeatable.

**Formal Dispute Resolution**
If communication breaks down completely, be aware that there is a formal dispute resolution process which can be found on the FDA website http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM070279.pdf should you feel that any of the notified findings in the form 483 are in error.

**Seek Clarification**
During the inspection itself, it is crucial to seek clarification from the inspector, if needed and in writing. If the investigator advises his intention to raise a form 483 after the inspection. It is important to understand each observation that the inspector has made. Ask for a reasonable explanation of each item raised and make notes that can be later referred to in your letter of response – it will be too late when the inspector has left the building.

**Policy Issues**
If there are questions concerning FDA policy, contact the FDA headquarters as the local FDA is not responsible and cannot affect policy.

In summary, the response to a form 483 needs to communicate three key points:

- Acknowledgement of the observations and an understanding of the specific requirements referenced.
- Establish credibility by demonstrating that your facility is committed to corrective and evidenced actions, both short and long-term.
- Answer each issue specifically, individually, concisely and in detail and generate credibility by giving evidence of cross-departmental cooperation where appropriate.
The Modern Regulatory Landscape

Increasingly, regulatory authorities demand more detail of the activities of any institution operating in the field of medicine, healthcare and clinical research for good reasons. But the burden it places on valuable resources to monitor and maintain records that build an authoritative audit trail can be very cost-inefficient.

Furthermore, the rising value of inventory in for example a hospital pharmacy, refrigerated warehousing, plasma centers or blood banks is such that a fail-safe system is needed to ensure that, even with perfect medical monitoring systems in place, advance warning of any potential threats to the compliance of the inventory is flagged up as a matter of urgency to prevent unavoidable losses and subsequent non-compliance.

Compliance is not going to get any easier – and a fully automated medical monitoring and alarming system is the long term answer to delivering the level of detail to provide a rock-solid audit trail and to prevent costly non-compliance and inventory loss.

Tutela Medical Monitoring Systems - Automation that Delivers Compliance

The Tutela wireless medical monitoring system was developed as a web-based technology from the ground up as we recognized that this brings significant benefits to the medical sector.

Being in “the cloud”, there is no on-site PC hardware and software for our customers to manage/validate and, by utilizing our customer’s existing IT network infrastructure coupled with wireless sensing, local installation time and associated costs are massively reduced.

Our customers love our web interface as it is truly intuitive and simple to use, needing the minimum of staff training, ensuring that their electronic records are available anywhere in the world on any device able to support a web browser.

Plus there are no licencing costs or hidden software upgrade fees.

The Tutela wireless medical monitoring system offers a full end to end service that includes system validation, NIST traceable calibration services and DQ, IQ, OQ protocol documentation.

With our highly secure website application utilizing ‘HTTPS’ and encryption security protocols, Tutela is a truly paperless service and all electronic records fully comply with FDA 21 CFR part 11.

At Tutela, we operate a 24/7 remote alarm bureau that ensures that any exception alarm is promptly delivered to our customer’s staff for action without misinterpretation.

For more information on the Tutela Wireless temperature monitoring system please visit: http://www.tutelamedical.com