

DOCUMENT NUMBER: COMM-QA-042	FRM4
DOCUMENT TITLE: Deviation and Investigation Report FRM4	
DOCUMENT NOTES:	
Document Information	
Revision: 05	Vault: COMM-QA-rel
Status: Release	Document Type: COMM-QA
Date Information	
Creation Date: 29 Oct 2019	Release Date: 30 Oct 2020
Effective Date: 30 Oct 2020	Expiration Date:
Control Information	
Author: BS76	Owner: RB232
Previous Number: COMM-QA-042 FRM4 Rev 04	4 Change Number: COMM-CCR-131

Form Number:
Initiator:
Date Initiated:
TAB 1: GENERAL INFORMATION
Program (select one):
Project Affected/Impacted (select all that apply): CCBB Bone Marrow CCBB CBUs CCBB PBSCs GMP Baebies GMP BM-MSC GMP CT-MSC GMP DUOC GMP Parathyroid GMP RVT-802 STCL All Other NA
Specify Other
Date Discovered:
Date Affected (start): Date Affected (end):
Title:
Supply/Reagent:
Equipment:

Note: Reference COMM-QA-042 Appendix A for instructions.

Problem Statement:			
Containment Actions:			

TAB 2: PROBLEM STATEMENT and CONTAINMENT

Note: Reference COMM-QA-042 Appendix A for instructions.

Investigation (Identifying Root Cause):	
Root Cause (Statement of Detailed Root Cause):	
Root Cause Analysis Tool Attached?	
C Yes C No C N/A	

COMM-QA-042 FRM4 Deviation and Investigation Report Office of Regulatory Affairs and Quality, DU Durham, NC

Note: Reference COMM-QA-042 Appendix A for instructions.

TAB 4: DEVIATION INFORMATION and REPORTING

Deviation Identification: Was any deviation from SOP identified? O Yes No
If Yes, select: Unplanned Deviation Planned Deviation
If Yes, List SOP reference (SOP Number only):
Reports Associated with this Deviation/Investigation List applicable reports (ex. DEV, CAPA, AE, OOS, COMP, Validation, Risk Assessment):
External Reporting:
Does this event require external reporting? Yes No
Explain determination for external reporting: [This section to be populated by author/initiator if known at time of report and/or OSU at time of review]

Note: Reference COMM-QA-042 Appendix A for instructions.

TAB 5: RISK ASSESSMENT and RATIONALE

Risk Assessment (Refer to procedure COMM-QA-077 Risk Assessment Procedure):

When assessing risk within one parameter, if two scores are determined (such as severity on product vs patient), the more stringent (higher score) assessment will be used when calculating the final risk score. Rationale for the lower score should also be provided.

Severity Assessment Score (S):

Severity Assessment Rationale (S):

S	Severity	Definition	Anticipated Harm	GMP Non-	Impact on Product
			to the Patient	compliance	
1	Negligible	Insignificant	None	None	No perceived impact on product
2	Marginal	At the outer or lower limits, minimal for requirements	Minimal	Minor	Unlikely impact on product, SQIPP not likely to be affected
3	Moderate	Within reasonable limits, transient or persistent	Transient or persistent, not life threatening	Significant	May indirectly impact product quality/SQIPP
4	Serious	Very important	Permanent, life threatening	Major	High likelihood of impacting product quality/SQIPP
5	Critical	Abnormal, unstable, unfavorable	May cause or contribute to death	Serious	Evidence of Product Impact, SQIPP affected

Probability Assessment Score (P):

Probability Assessment (Occurrence and Recurrence) Rationale (P):

P	Probability	Definition (Occurrence)	Definition (Recurrence)
1	Rare	Not likely to happen, nearly impossible	Extremely unlikely to recur
2	Low	Occurrence is hardly likely, but possible	Unlikely to recur
3	Occasional	May occur sometimes	Likely to recur sometimes
4	Probable	Repeated occurrence, high likelihood of occurrence	Recur at moderate rate
5	Frequent	Will happen for certain, a regularly observed event	Likely to recur regularly

Note: Reference COMM-QA-042 Appendix A for instructions.

Detectability Assessment Rationale (D):

D	Detectability	Definition	Examples
1	High	l	Automatic detection system that is a direct measure of
	Iligii	certain	the failure
2	Good	Control system is in place with a high probability	SOP driven process that facilitates a direct measure of
	Good	to detect the issue or its effects	the failure
3	Moderate	Control system in place could detect the issue or	SOP driven process that is NOT directly measuring or
3		its effects	assessing the failure
1	Fair	Control system in place with a low probability to	Non-SOP driven process for detection of direct
*	T'an	detect the issue or its effects	measure of the failure
5	Low	Low No control system in place to detect the issue.	No ability to detect the failure or no SOP-driven
			process to indirectly detect the failure

COMBINED RISK ASSESSMENT SCORE:
□N/A
Risk Assessment Summary/Conclusion (If one risk parameter is scored a 5 and no CAPA is launched, justification is required as detailed in Appendix A on "Attachments and Appendix Tab"):
Image of Table 4 From COMM-QA-077

TAB 6: CAPA
CAPA Number (if applicable): CAPA Report
Summary of CAPA (Provide an Overview of CAPA(s) to be implemented, if applicable):

TAB 7: UPIs/QUARANTINE/LICENSURE
<u>Unique Product Identifier(s):</u>
<u>List UPI(s)</u>
Was quarantined applied to product associated with this report? Yes No N/A Describe Rationale For Selection:
If all specifications for licensure are met, is there any reason that product(s) cannot be released under the license
due to this event? Yes No N/A Describe Rationale For Selection:

TAB 8: EVENT CODING an	nd BPDR	
QA Assessment (Completed l	by QSU):	
If a BPDR is required, enter the	e BPDR Number:	(text field)
Event Code (select)	Specify Other (Describe)	
•		
Deviation Category (Select)		
•		
TAB 9: ATTACHMENTS a	nd APPENDIX	
Attachment(s)		
Appendix from COMM-QA-	042	

Signature Manifest

Document Number: COMM-QA-042 FRM4 **Revision:** 05

Title: Deviation and Investigation Report FRM4

Effective Date: 30 Oct 2020

All dates and times are in Eastern Time.

COMM-QA-042 FRM4 Deviation and Investigation Report FRM4

Author

Name/Signature	Title	Date	Meaning/Reason
Bing Shen (BS76)		23 Oct 2020, 03:42:46 PM	Approved

Medical Director

Name/Signature	Title	Date	Meaning/Reason
Joanne Kurtzberg (KURTZ001)		23 Oct 2020, 05:18:16 PM	Approved

Quality

Name/Signature	Title	Date	Meaning/Reason
Richard Bryant (RB232)		26 Oct 2020, 10:28:27 AM	Approved

Document Release

Name/Signature	Title	Date	Meaning/Reason
Sandy Mulligan (MULLI026)		27 Oct 2020, 06:12:10 PM	Approved