



Advancing Pharmaceutical Quality: Quality Management Maturity Program

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State of Quality in the Pharmaceutical Industry

FDA 21st century vision for manufacturing and quality with input from academia and industry. The desired state was described as follows:

“A maximally efficient, agile, flexible pharmaceutical manufacturing sector that reliably produces high-quality drug products without extensive regulatory oversight.”

“While much progress has been made, we have not fully realized our 21st century vision for manufacturing and quality.”

Food and Drug Administration [Docket No. FDA-2018-N-1903] Modernizing Pharmaceutical Quality Systems; Studying Quality Metrics and Quality Culture; Quality Metrics Feedback Program, June 2018

ISPE Advancing Pharmaceutical Quality (APQ) Program Overview

- ❖ An industry-led program for advancing the state of Pharmaceutical Quality that companies could leverage to achieve the goal of ensuring a continuous supply of quality medicines to patients
- ❖ Built on the ICH Q10 framework enhanced to include operational excellence and quality culture
- ❖ Deliverables are Guides to include maturity assessments, KPIs, and continual improvement tools focused on the ICH Q10 elements
- ❖ Complementary, where possible, to current regulatory initiatives promoting quality excellence e.g. PIC/S Data Integrity Guidance, FDA New Inspection Project (NIPP), and the MHRA Data Integrity Guideline.



Primary Goals of APQ Program



❖ Industry

- ❖ **Supports and incentivizes sustained, continual improvement** of a firm's PQS
- ❖ **Benchmarking & best practice sharing** to accelerate progress

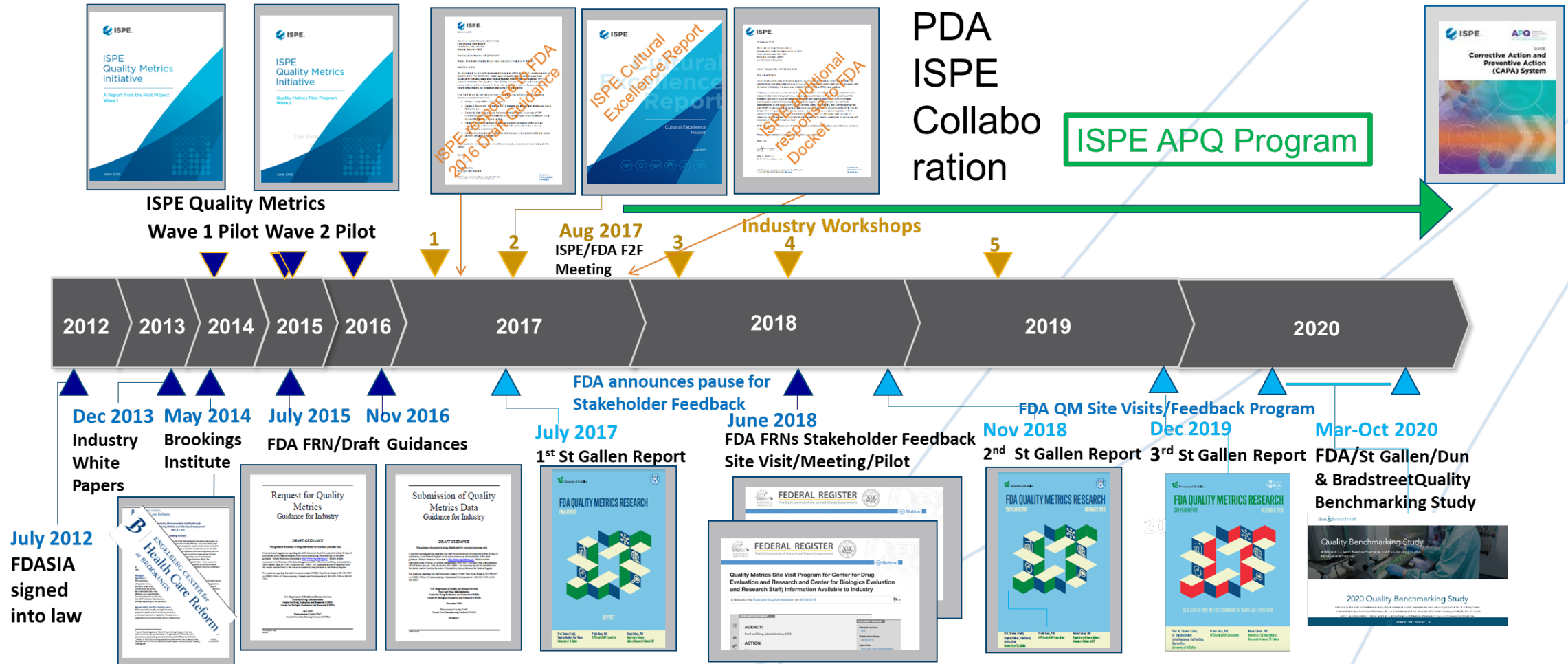
❖ Patients and Consumers

- ❖ **Increased reliability of supply** of quality product

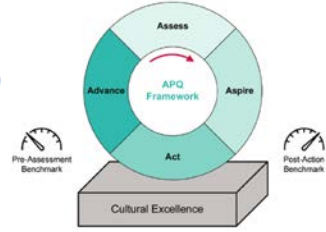
❖ Health Agencies

- ❖ Better insight into **industry's focus and current expectations** regarding critical quality areas for advancing pharma quality

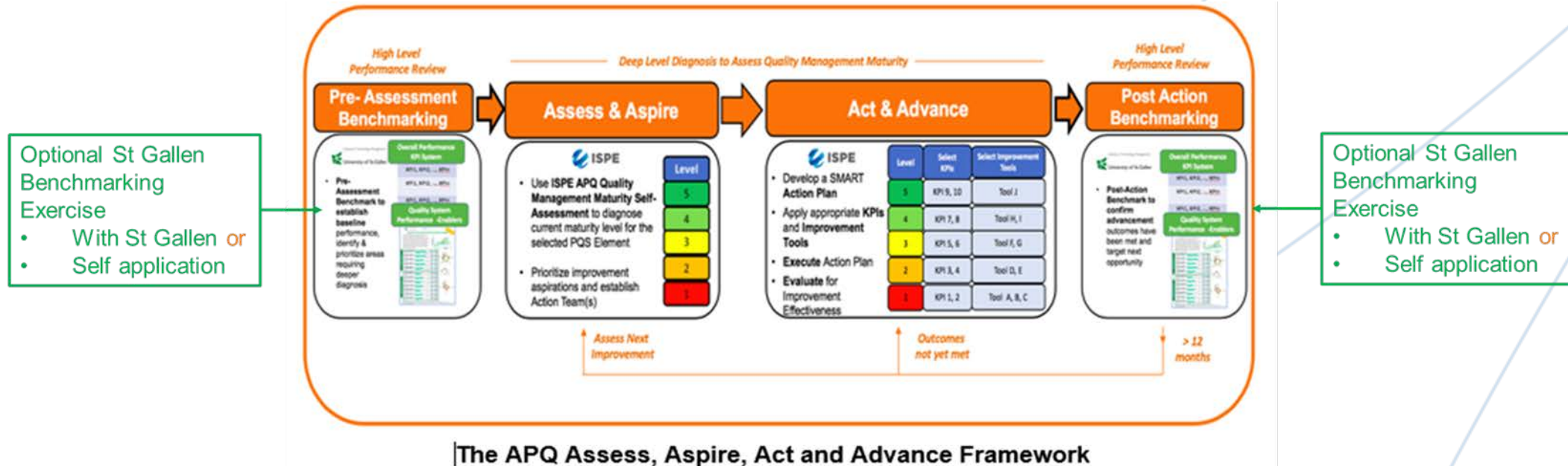
The ISPE Quality Metrics/Advancing Pharmaceutical Quality (APQ) Timeline



APQ Program Framework Based upon ICH Q10



- ❖ Quality Management Maturity Program: maturity assessment, KPIs, and improvement tools
 - ❖ Assess, Aspire, Act, Advance
- ❖ Incorporated Pre- and Post-Benchmark Assessment for targeted improvement focus
- ❖ Piloted concepts with interested companies to validate and understand value to industry.
- ❖ Leverage Operational Excellence and Cultural Excellence as Foundation

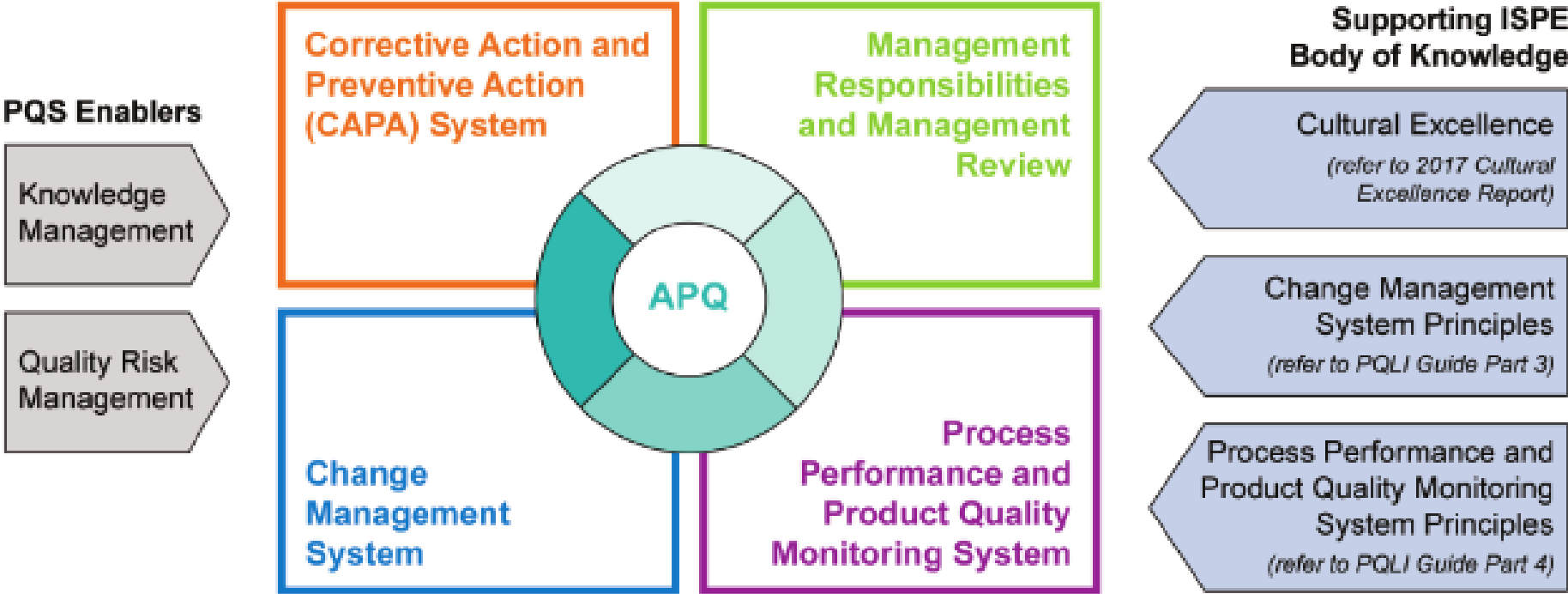


ISPE Advancing Pharmaceutical Quality Program



ISPE APQ Guide Series

Application of the APQ framework to Pharmaceutical Quality System (PQS) elements based upon ICH Q10



ISPE APQ Guide Series - Content

Each of the 4 Modules of the Guide Series will contain:

- Background of the APQ Framework
- Overview and Structure of the APQ Framework
- How to conduct the Quantitative Pre- and Post-Assessments
 - In the St Gallen Benchmarking program
 - OR**
 - By conducting internally
- How to conduct and score a deep dive **Assess and Aspire** exercise for each Q10 element
- How to set up an **Act and Advance** improvement program
- A worked example to assist practitioners

CAPA Maturity Assessment

Assess: Determine overall CAPA maturity level utilizing **CAPA Maturity Assessment**.

	Undefined	Defined	Managed	Improved	Optimized
CAPA Maturity Area	Level 1	Level 2	Level 3	Level 4	Level 5
	*Undefined *Uncontrolled *Not monitored *No evidence	*Partially defined *Not formally controlled *Not formally monitored *Person dependent	*Defined policy and processes *Meets Requirements for Application *Process monitoring and controls in place	*Defined policy and processes *Routine application *Routine monitoring, advancing improvements	*Proactive *Continuous Improvement *Predictive

Maturity Assessed for each of the following areas/sub-elements of the CAPA system:

1. Documentation
2. Problem Identification
3. Root Cause Investigation
4. Corrective and/or Preventive Actions
5. Effectiveness
6. Metrics
7. Governance, Management Oversight, & CAPA Prioritization

Level 4
Demonstrates improved/optimized execution
*Defined policy and processes *Routine application *Routine monitoring, advancing improvements

Aspire: Determine what overall CAPA maturity level your company would like to achieve.

CAPA Maturity Assessment

Overall high level
descriptors for all
areas →

Detailed descriptors
for individual area →

	Undefined	Defined	Managed	Improved	Optimized
CAPA Maturity Area	Level 1	Level 2	Level 3	Level 4	Level 5
	<ul style="list-style-type: none"> *Undefined *Uncontrolled *Not monitored *No evidence 	<ul style="list-style-type: none"> *Partially defined *Not formally controlled *Not formally monitored *Person dependent 	<ul style="list-style-type: none"> *Defined policy and processes *Meets Requirements for Application *Process monitoring and controls in place 	<ul style="list-style-type: none"> *Defined policy and processes *Routine application *Routine monitoring, advancing improvements 	<ul style="list-style-type: none"> *Proactive *Continuous Improvement *Predictive
CAPA Effectiveness	<ul style="list-style-type: none"> There is no SOP and/or training that outlines that effectiveness check criteria must be established. Effectiveness checks are not completed to demonstrate that the Corrective Actions or Preventive Actions were effective at eliminating or mitigating the root cause(s) of the deviation/nonconformance or potential nonconformance (preventive action). 	<ul style="list-style-type: none"> A SOP and/or training exists that outlines that effectiveness check criteria must be established, however effectiveness check criteria is not always documented within the records. Effectiveness checks are sometimes completed to demonstrate that the Corrective Actions or Preventive Actions were effective at eliminating or mitigating the root cause(s) of the deviation/nonconformance or potential nonconformance (preventive action). 	<ul style="list-style-type: none"> A SOP and/or training exists that outlines that effectiveness check criteria must be established. The effectiveness check criteria is always documented within the records, however the criteria may not always be adequate. Effectiveness checks are always completed/documentd to demonstrate that the Corrective Actions or Preventive Actions were effective at eliminating or mitigating the root cause(s) of the deviation/nonconformance or potential nonconformance (preventive action). 	<ul style="list-style-type: none"> A SOP and/or training exists that outlines that effectiveness check criteria must be established. The effectiveness check criteria is always documented within the records. The criteria includes the following (or equivalent): <ul style="list-style-type: none"> The data sources to be evaluated Quantifiable criteria to meet in order to eliminate/mitigate the deviation/nonconformance Length of time or number of opportunities to review. Statistical methodology is sometimes used Effectiveness checks are always completed/documentd to demonstrate that the Corrective Actions or Preventive Actions were effective at eliminating or mitigating the root cause(s) of the deviation/nonconformance or potential nonconformance (preventive action) 	<ul style="list-style-type: none"> Effectiveness check process has become predictive, not only in addressing corrective actions but truly emphasizing preventive and predictive measures for effectiveness. Predictive Analytics are used to continually improve and foster a culture of preventive action within the QMS. This is engrained in the QMS processes, provides seamless network collaboration and proactive actions to drive continual improvement. Best practices related to training are shared across the sites and network to improve overall performance.

CAPA Program Tool Catalogue

CAPA Tool Catalogue

Use: For a given maturity level, utilize recommended tools at current level as well as lower levels as appropriate.

Note: Utilizing tools at a level or two higher than current level may be considered when building an organization's capability.

	Undefined	Defined	Managed	Improved	Optimized
CAPA Maturity Area	Level 1	Level 2	Level 3	Level 4	Level 5
	<ul style="list-style-type: none"> *Undefined *Uncontrolled *Not monitored *No evidence 	<ul style="list-style-type: none"> *Partially defined *Not formally controlled *Not formally monitored *Person dependent 	<ul style="list-style-type: none"> *Defined policy and processes *Meets Requirements for Application *Process monitoring and controls in place 	<ul style="list-style-type: none"> *Defined policy and processes *Routine application *Routine monitoring, advancing improvements 	<ul style="list-style-type: none"> *Proactive *Continuous Improvement *Predictive
CAPA Documentation					
Problem Identification					
Root Cause Investigation					
Corrective and/or Preventive Actions					
CAPA Effectiveness					
CAPA Metrics	Recommended metrics included		Note: Clearly define which issues or signals contribute to each metric. Note: Either establish targets (based on what makes sense for your business) or use metrics to identify trends.		
Governance, Management Oversight, & CAPA Prioritization					

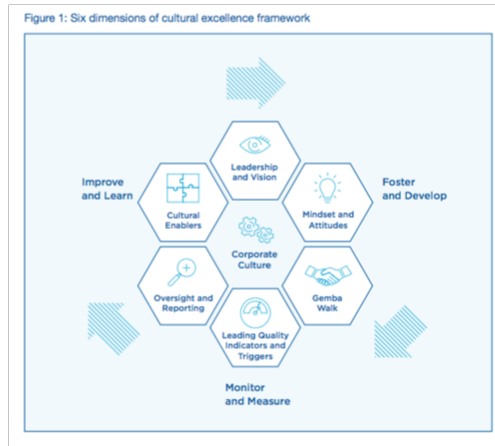
Recommended tools, KPIs, actions and procedures given

ISPE Cultural Excellence Support Materials

• 2017 Cultural Excellence Report

The Six Dimensions of Cultural Excellence

A holistic framework of those elements required to foster, develop, monitor, measure, learn, and ultimately improve your organization's quality culture



Source: ISPE Cultural Excellence Report, April 2017

• ISPE/PDA Collaboration

www.ispe.org/improveculture or www.pda.org/improveculture

• ISPE Cultural Excellence Report 2

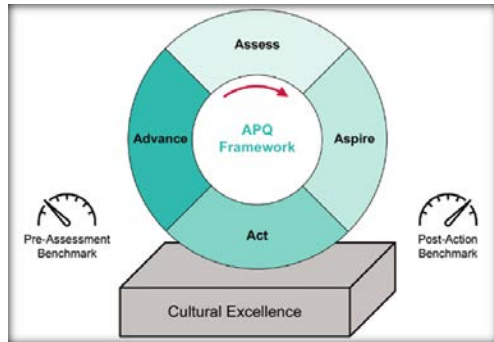
Cultural Excellence Assessment Tool – Appendix 1

DESIRED STATE	LEVEL 1 Strongly disagree	LEVEL 2 Disagree	LEVEL 3 Neutral	LEVEL 4 Agree	LEVEL 5 Strongly agree	POSSIBLE IMPROVEMENT ACTIONS	CULTURAL ENABLERS
2. Mindset and attitudes							
2.1 All employees consistently see quality and compliance as a personal responsibility.						<ul style="list-style-type: none"> 1. Ensure employee job descriptions reflect the importance of quality work, upholding GMPs and continual improvement. 2. Have quality culture behavior and performance goals built into yearly objectives for business and employees. 3. Ensure reward and recognition program is aligned to support employee ownership of quality and quality culture behavior demonstration. 4. Deploy and enable common continuous improvement methodology training and experiences within the organization (e.g., Lean Six Sigma, quality risk management, knowledge management) to engage employees in quality improvement work and provide positive quality improvement experiences where they take the responsibility to directly improve quality. 	<ul style="list-style-type: none"> • Job descriptions • Performance management process • People recognition systems • Training and coaching
2.2 Employees have sufficient authority to make decisions and feel trusted to do their job well.						<ul style="list-style-type: none"> 1. Ensure there are decision-making guidelines, training and coaching in place to support the expectation that both business and quality issues are considered. 2. Deploy and enable common continuous improvement methodology training and experiences within the organization (e.g., Lean Six Sigma, quality risk management, knowledge management) to engage employees in quality improvement work and provide positive quality improvement experiences where they take the responsibility to directly improve quality. 3. Ensure process is in place to capture ideas to improve current processes and encourages employees to submit improvement suggestions (with a feedback loop in place to provide an update on whether improvement actions will be implemented and the status of implementation to the employees). 4. Ensure employees have job function training that is competency based as well as training in good manufacturing practices. Employees need to have the technical knowledge to understand how their role and responsibilities impact quality. 	<ul style="list-style-type: none"> • Training and coaching • Communications • Decision-making guidelines • Improvement suggestion process

Root Cause Analysis Guide

Reward and Recognition GEMBA Walk

APQ Guide Reviews



Industry Review & Pilot

Academia Review

Health Authority Review

ISPE Advancing Pharmaceutical Quality Core Team Members



Tami Frederick	APQ Chair, Perrigo	Harry Jeffreys	Bausch Health
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Lori Chelemedos	Consultant, Pac Side LLC	Jennifer Peszek	Pfizer
Andrew Denny	Bristol Meyers Squibb	Chris Potter	ISPE
Joseph Famulare	Genentech	Christine Teipen-Smith	Eli Lilly
Kira Ford	Eli Lilly	Nelson Webb	Proctor and Gamble
Betsy Fritschel	Johnson and Johnson	Carol Winfield	ISPE
Steve Greer	Genesis Assist	Bryan Winship	Jubilant Cadista
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