

**STANDARD OPERATING PROCEDURE**  
**International Pharmaceutical Excipients Auditing, Inc.**

Title <b>Post Certification Review</b>		Revision <b>1</b>	SOP Number <b>17</b>
Originator Irwin Silverstein	Approved By IPEA Management Committee	Effective Date May 24, 2011	Page Page 1 of 4

**PURPOSE:**

This procedure describes the various incidents that may have an impact on the continuing certification of the site for substantial conformance to the Joint IPEC-PQG Good Manufacturing Practices Guide for Pharmaceutical Excipients and the evaluation of those incidents by IPEA.

**SCOPE:**

This procedure applies to incidents that may adversely impact the sites Excipient GMP Conformance certification including unauthorized use of the IPEA Certificate and Mark.

**RESPONSIBILITIES:**

1. **Certification Board:** Review the impact of regulatory actions, complaints, and changes, as provided by IPEA Executive Management, to the continued certification of the applicant site.
2. **IPEA Executive Management:** Review all complaint investigations to assure the applicant site continues to meet IPEA Excipient GMP Conformance program requirements and direct review by the Certification Board where the incident may impact substantial conformance to excipient GMP.

**REFERENCES:**

1. SOP 16, Appeals, Complaints, and Disputes
2. SOP 25, Authorized Use of the Certificate and Mark

**DEFINITIONS:**

**See Glossary**

**PROCEDURE:**

1. An applicant may experience incidents that can impact their continuing substantial conformance to excipient GMP. Such incidents include, but are not limited to:
  - Adverse regulatory actions such as a U.S. FDA form 483 or Warning Letter.
  - Market withdrawal, recall or request by a Health Authority to stop distribution.
  - Complaint from a customer of the applicant to IPEA concerning site conformance to excipient GMP.
  - Change in ownership, management, or structure.
  - Change in quality system design.
  - Unauthorized use of the IPEA Certificate or Mark.
  - **Adverse Regulatory Actions:** All notices of adverse regulatory actions such as a U.S. FDA Form 483 or Warning Letter, or similar notification from competent authorities from other jurisdictions are reviewed by the

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Certification Board to ascertain their impact on Certification of the applicant. Where the Board recommendation is to withdraw Certification, the applicant is notified and has 30-days within which to file an appeal.

- **Withdrawal:** All actions whereby excipient is removed from the distribution whether due to quality or conformance deficiencies or at the request by a Health Authority are reviewed by the Certification Board to ascertain the impact to Certification of the applicant. Where the Board recommendation is to withdraw Certification, the applicant is notified and has 30-days within which to file an appeal.
- **Complaints:** Where a complaint concerning the applicant sites conformance to excipient GMP has been received and the investigation has been completed, IPEA Executive Management reviews the complaint report and issues a recommendation concerning the impact of the complaint on continued certification of the applicant to Excipient GMP Conformance. Where the report concludes the site continues to be in substantial conformance, the report is placed in the applicant file and at the next site audit is provided to the Lead Auditor.

If the complaint investigation report raises a concern for the continuing certification of the applicant, the report is submitted to the Certification Board for their review and recommendation.

- i. Where the Certification Board recommendation is to withdraw the Certification, the applicant is notified and has 30-days to file an appeal.
  - ii. Where the decision of the Certification Board is evenly split, the IPEA CEO or designate casts the deciding vote.
- **Change in Ownership, Management, or Structure:** Executive Management reviews changes to the applicant site such as:
    - **Ownership:** The relationship between the original owner and the new owner, and its impact on the Quality system and responsibility.
    - **Management:** Leadership from the Quality Unit up to the individual with overall responsibility for the site and changes in the reporting arrangements for the Quality Unit through above-site reports.
    - **Organizational structure:** Any department with responsibility for conformance to Excipient GMP.

Executive Management issues a report evaluating the impact of the change to the continued Certification of the applicant site. If the report raises a concern for the continuing certification of the applicant, the report is submitted to the Certification Board for their review and recommendation.

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- i. Where the Certification Board recommendation is to withdraw the Certification, the applicant is notified and has 30-days to file an appeal.
  - ii. Where the decision of the Certification Board is evenly split, the IPEA CEO or designate casts the deciding vote.
- **Change in Quality System Design:** Executive Management reviews changes to the Quality System design and issues a report of the impact to applicant conformance to excipient GMP. The report is submitted to the Certification Board for their review and recommendation.
  - Where the Certification Board recommendation is to withdraw the Certification, the applicant is notified and has 30-days to file an appeal.
  - Where the decision of the Certification Board is evenly split, the IPEA CEO or designate casts the deciding vote.
- **Unauthorized Use of the IPEA Certificate or Mark:** Notification of the unauthorized use of the IPEA Certificate or Mark is forwarded to Executive Management. A review of the documentation is conducted and where the conclusion is that the use of the IPEA Certificate or Mark is not authorized, the applicant is notified to correct the matter. The applicant notifies Executive Management of the corrective measures to be implemented along with the due date for implementation. Executive Management assures there is confirmation that the corrective measures were implemented.
  - If the applicant disagrees with the conclusion of Executive Management that the use of the IPEA Certificate or Mark is not appropriate, the applicant can file an appeal.
  - If the applicant continues to use the IPEA Certificate or Mark in a manner that is not appropriate and they have not filed an appeal within 30-days or their appeal has been denied, the applicant is requested in writing by registered mail, or other suitable means, to immediately stop using the IPEA Certificate and Mark in the unsuitable manner.
    1. If the applicant continues to use the IPEA Certificate and Mark 30-days after they have received the notification, the applicant is notified via registered mail, or other suitable means, that the certification of the site will be withdrawn unless the situation is remedied within 5 business days.
    2. If the applicant continues to use the IPEA Certificate and Mark, IPEA adds a notice to the certification website that the applicant is no longer certified. IPEA also notifies the U.S. Food and Drug Administration that the applicant continues to use the IPEA Certificate and Mark even though no longer certified.

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2. The applicant may request an amendment to the scope of their certification such as:

- Additions to their excipient product line at the certified site,
- Broadening to include an additional site, or
- Inclusion or removal of operations conducted at the site.

Such requests are reviewed by Executive Management:

- a. If such amendment is supported, without modification, by the Quality System, the change is reviewed by the Certification Board.
  - i. If the amendment is rejected, the applicant is notified as to the reason for the rejection and can file an appeal.
- b. Where the request is to add an excipient, Executive Management determines if its manufacture is covered by the existing certification and if not, an audit is arranged.
- c. Where an additional site is to be added to the Certificate, an audit is arranged.

**HISTORY OF REVISIONS**

<b>Revision No.</b>	<b>Effective Date</b>	<b>Description of Changes</b>
0	May 15, 2009	New Procedure
1	May 24, 2011	Minor changes to responsibility