PathWise

Pharmaceuticals Audit Checklist Example

21 CFR 211

Requirement	Yes	No	N/A	Comments
21 CFR Part 211 CURRENT GOOD MANUFACTURING PRACTICE FOR FINISHED PHARMACEUTICALS				
Subpart B—Organization and Personnel				
Is there a quality control (QC) unit with approval/ rejection responsibility and authority? Does the QC have the authority to review production records to assure that no errors have occurred or, if errors have occurred, that they have been fully investigated? (211.22)				
Are the laboratory facilities adequate for testing and approval/rejection process? (211.22(b))				
Are there written procedures outlining the responsibilities and procedures applicable to QC? Are they followed? (211.22(d))				
Do employees, supervisors, and consultants have the necessary education, training, and experience to enable that person to perform the assigned functions? (211.25, 211.34)				
Are employees trained in current GMP on a continuing basis to assure that employees remain familiar with CGMP requirements applicable to them? (211.25)				
Is there an adequate number of qualified personnel to perform and supervise the manufacture, processing, packing, or holding of each drug product? (211.25(c))				

Additional Notes:

Requirement	Yes	No	N/A	Comments
Do personnel wear clean clothing appropriate for the duties they perform, including protective apparel worn as necessary to protect drug products from contamination? (211.28(a))				
Are areas of facilities and buildings designated as limited-access areas only accessible to personnel authorized by supervisory personnel? (211.28(c))				
Are personnel shown to have illness/ lesions that may adversely affect the safety or quality of drug products excluded from direct contact with components, containers, closures, in-process materials, and drug products? (211.28(d))				
Are records maintained stating the name, address, and qualifications of consultants and the type of service they provide? (211.34)				
Subpart C—Buildings and Facilities				
Are facilities of suitable size, construction and location to facilitate cleaning, maintenance, and proper operations? Is the space adequate and flow through the building designed to prevent mix-up/ contamination? (211.42(a))				
Are operations performed within specifically defined areas of adequate size? (211.42(c))				
If performing operations relating to penicillin, are these operations performed in facilities separate from used for other drug products for human use? (211.42(d))				
Is there adequate lighting and ventilation in all areas? (211.44, 211.46)				

Additional Notes:

Requirement	Yes	No	N/A	Comments
Is equipment for adequate control over air pressure, micro-organisms, dust, humidity, and temperature provided (where appropriate)? (211.46(b))				
Are air filtration systems used on air supplies to production areas? Where air contamination occurs during production, are there adequate exhaust systems or other systems adequate to control contaminants? (211.46(c))				
Are air-handling systems for the manufacture, processing, and packing of penicillin completely separate from those for other drug products for human use? (211.46(c))				
Is potable water supplied under continuous positive pressure in a plumbing system free of potentially contaminating defects? (211.48(a))				
Are drains of adequate size and, where connected directly to a sewer, provided with an air break or other mechanical device to prevent back-siphonage? (211.48(b))				
Is sewage, trash, and other refuse in and from the building and immediate premises disposed of in a safe, timely, and sanitary manner? (211.50)				
Are adequate washing facilities provided, including hot and cold water, soap or detergent, air driers or single-service towels, and clean toilet facilities easily accessible to working areas? (211.52)				
Are facilities maintained in a clean and sanitary condition? (211.56(a))				
Is building free of infestation by rodents, birds, insects, and other vermin (other than laboratory animals)? (211.56(a))				

Additional Notes:

Requirement	Yes	No	N/A	Comments
Is there a written procedure assigning responsibility for sanitation and describing in sufficient detail the cleaning schedules, methods, equipment, and materials to be used in cleaning facilities? Are written procedures followed? (211.56(b))				
Are there written procedures for use of suitable (e.g. registered) rodenticides, insecticides, fungicides, fumigating agents, and cleaning and sanitizing agents designed to prevent contamination? Are the procedures followed? (211.56(c))				
Are buildings used in the manufacture, processing, packing, or holding of a drug product maintained in a good state of repair? (211.58)				
Subpart D—Equipment				
Is equipment appropriately designed, sized, and located to facilitate operations for its intended use and for its cleaning and maintenance? (211.63)				
Is equipment constructed so that surfaces are not reactive, additive, or absorptive so as to alter the safety, identity, strength, quality, or purity of the drug product beyond the official or other established requirements? (211.65)				
Are substances required for operation (e.g. lubricants or coolants) prevented from coming into contact so as to alter the safety, identity, strength, quality, or purity of the drug product beyond the official or otherwise established requirements? (211.65)				

Additional Notes:

Requirement	Yes	No	N/A	Comments
Are written procedures established and followed for cleaning and maintaining equipment / utensils? (211.67) Do these procedures cover:				
a. Assignment of responsibility for cleaning/ maintaining equipment				
b. Maintenance and cleaning schedules				
c. Description of the methods, equipment, and materials used in cleaning and maintenance operations, and the methods of disassembling and reassembling equipment as necessary to assure proper cleaning and maintenance				
d. Removal or obliteration of previous batch identification				
e. Protection of clean equipment from contamination				
f. Inspection of equipment for cleanliness immediately before use				
Are records of maintenance, cleaning, sanitizing, and inspection kept? (211.67)				
7. If automatic, mechanical, or electronic equipment is used, is it routinely calibrated, inspected, or checked according to a written program? Are written records of those checks and inspections maintained? (211.68(a))				
Are appropriate controls exercised over computer systems or related systems to assure changes in master production and records are instituted only by authorized personnel? (211.68(b))				
Is input and output from the computer or related system of formulas or other records or data checked for accuracy? Is the frequency of verification based on the complexity and reliability of the computer or related system? (211.68(b))				

Additional Notes:

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Is there a backup file of data entered into the computer or related system maintained? (211.68(b))				
Are hard copy or alternative systems maintained and designed to assure that backup data is secure from alterations or loss? (211.68(b))				
Where liquid filtration filters are used in the manufacture, processing, or packing of injectable drug products intended for human use, do they comply with the following: - Prevented from releasing fibers? - If fiber-releasing, is it used with an additional non-fiber-releasing filter? - No asbestos? (211.72)				
Subpart E—Control of Components and Drug Product Containers and Closures				
Are there written procedures describing the receipt, identification, storage, handling, sampling, testing, and approval/rejection of components and drug product containers and closures? Are procedures followed? (211.80(a))				
Are components and drug product containers and closures handled and stored in a manner to prevent contamination? (211.80(b))				
Are bagged or boxed components of drug product containers or closures stored off the floor and suitably spaced to permit cleaning and inspection? (211.80(c))				
Is each container or grouping of containers identified with a distinctive code for each lot in each shipment received? Is this				

Additional Notes:

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code used in recording the disposition of each lot, allowing for the lot to be identified as to its status (i.e. quarantined, approved, rejected)? (211.80(d))				
Upon receipt and prior to acceptance, is each container or grouping of containers examined visually for appropriate labeling, damage, and contamination? (211.82(a))				
Are components, containers, and closures stored under quarantine until they have been tested or examined and released? (211.82(b))				
Is each lot withheld from use until it has been appropriately sampled, tested, or examined and released by the QC unit? (211.84(a)-(d))				
Is the number of samples taken based on appropriate criteria? (211.84(b))				
Are samples collected appropriately, including cleaning and sterilization to prevent contamination? (211.84(c))				
Are samples tested appropriately, including tests for identity, conformity with specifications, and contamination? (211.84(d))				
Are lots of materials that do not meet specifications rejected? (211.84(e))				
Are components, containers, and closures approved for use organized so that the oldest stock is used first? (211.86)				
Is retesting performed as necessary (e.g. after storage for long periods or exposure to air/heat)? (211.87)				
Are rejected materials identified and controlled to prevent use in operations for which they are unsuitable? (211.89)				

Additional Notes:

Requirement	Yes	No	N/A	Comments
Are there documented standards or specifications, testing methods, and (where indicated) methods of cleaning/ sterilization for drug product containers and closures? (211.94(d))				
Do container closure systems provide adequate protection against foreseeable external factors in storage and use that can cause contamination? (211.94(b))				
Are drug product containers and closures clean and (where appropriate) sterilized? Are they designed so as not to alter the drug? (211.94(a)(c))				
Do medical gas containers and closures meet the requirements of 211.94(e), including required gas-specific use outlet connections and proper labeling?				
Subpart F—Production and Process Controls				
Are there written procedures for production and process control to assure that drug products have the identity, strength, quality, and purity they are represented to possess? Are these procedures drafted, reviewed, and approved by appropriate organizational units and QC? (211.100(a))				
Are procedures documented at the time of execution and performance of the relevant functions, including justifications for any deviations? (211.100(b))				
Is the batch formulated to provide not less than 100% of established active ingredients? (211.101(a))				
Are components weighed, measured, or subdivided as appropriate? Is this process supervised by a second person? (211.101(b)-(c))				

Additional Notes:

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Where components are removed from the original container to another, is the new container able to be appropriately identified? (211.101(b))				
Is each component added to the batch verified by someone other than the person/equipment that added it? (211.101(d))				
Are yields determined at the conclusion of each appropriate phase of manufacturing, processing, packaging, or holding? Is yield verified outside of the person/equipment that calculated it? (211.103)				
Is all equipment used during production properly identified by a distinctive identification number recorded in the batch production record? (211.105(a)-(b))				
Are written procedures established to assure batch uniformity and integrity of drug products? Do these include at least the following, where appropriate: - Tablet or capsule weight variation - Disintegration time - Adequacy of mixing to assure uniformity and homogeneity - Dissolution time and rate - Clarity, completeness, or pH of solutions - Bioburden (211.110(a))				
Are in-process specifications consistent with final specifications, and assure that the product and material conform to specifications? (211.110(b))				
Are in-process materials inspected and approved or rejected by QC during the production process? (211.110(c))				

Additional Notes:

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Are rejected in-process materials controlled to prevent use in operations for which they are unsuitable? (211.110(d))				
Are time limits for completion of each phase established where appropriate to assure quality? Are deviations acceptable (i.e. do not compromise quality) and justified and documented? (211.111)				
Are written procedures established and followed to prevent objectionable microorganisms of nonsterile products or microbiological contamination of sterile products (including validation of aseptic and sterilization processes)? (211.113)				
Are written procedures established and followed prescribing a system for reprocessing batches that do not conform to standards or specifications? Is all reprocessing approved by QC prior to performance? (211.115)				
Subpart G—Packaging and Labeling Control				
Are there written procedures regarding the labeling and packaging materials? (211.122(a))				
Are records maintained for each shipment received of labeling and packaging materials indicating receipt, examination, and whether accepted or rejected? (211.122(c))				
Are labels for different products, strengths, dosages, or quantities stored separately with suitable identification? Is access to the storage area limited to authorized personnel? (211.122(d))				
Are obsolete/outdated labels or packaging materials destroyed? (211.122(e))				

Additional Notes:

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Is gang-printed labeling for different products or different strengths or net contents of the same product either avoided or limited to labeling adequately differentiated by size shape or color? (211.122(f))				
Is a special control procedure in place for labeling and packaging using cut labeling for immediate container labels, individual unit cartons, or multi-unit cartons containing immediate containers that are not packaged in individual unit cartons? (211.122(g))				
Are printing devices used to imprint labeling monitored to assure that all imprinting conforms to specifications? (211.122(h))				
Is labeling strictly controlled, including examination for identity and conformity to specifications? Are written procedures in place describing control for issuance of labelling? (211.125(a), (b), (f))				
Are procedures used to reconcile quantities of labeling with quantities of finished drug products (unless 100-percent examination is performed for cut/roll labelling or wraparound labels on portable cryogenic medical gas containers)? Are discrepancies outside narrow preset limits investigated? (211.125(c))				
Are all excess labeling bearing lot/control numbers destroyed? (211.125(d))				
Is returned labeling maintained and stored to prevent mix-ups? (211.125(e))				

Additional Notes:

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Are there written procedures in place to assure that correct labels, labeling, and packaging materials are used? Are they followed? (211.130)				
Do the labeling/ packaging procedures incorporate the following: - Prevention of mix-ups - Identification of unlabeled drug products set aside for future labeling - Identification of drug product with lot/control number - Inspection and documentation of inspection of packaging and labeling materials before packaging operations - Inspection of packaging/labeling facilities immediately before use, including assurance that packaging and labeling materials not suitable for subsequent operations have been removed. Results of inspection documented in batch production records (211.130)				
Do over the counter (OTC) human drug products comply with tamper-evident packaging requirements of 211.132, including tamper-evident packages distinctive by design and labeling identifying all tamper-evident features? (211.132)				
Are packaged and labeled products examined to provide assurance of correct label? Are results of sample examinations recorded in batch production or control records? (211.134)				
Do labels bear an expiration date (related to storage conditions stated on the labeling) determined by appropriate stability testing? (211.137(a)(b)) (211.166)				

Additional Notes:

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This does not apply to allergenic extracts labeled "No U.S. Standard of Potency" or homeopathic drug products (211.137 (e)-(g))				
Do reconstituted products bear expiration information for both reconstituted and non-reconstituted drug products? (211.137(c))				
Subpart H—Holding and Distribution				
Are there written procedures describing warehousing of drug products, including quarantine before QC release and storage under appropriate conditions? Are they followed? (211.142)				
Are there written procedures describing the distribution of drug products, including use of oldest approved stock first and maintaining distribution records of each lot to facilitate recall if necessary? Are the procedures followed? (211.150)				
Subpart I—Laboratory Controls				
Does each batch of drug product have laboratory (lab) determination of satisfactory conformance to final specifications prior to release? (211.165(a))				
Is lab testing performed as necessary on each batch of drug product required to be free of objectionable microorganisms? (211.165(b)				
Do written procedures outline sampling and testing plans, including methods and numbers of units? Are procedures followed? (211.165(c)(e))				
Are acceptance criteria for the sampling and testing adequate to assure batches meet specifications as a condition of their approval and release? Where reprocessing is performed on				

Additional Notes:

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rejected products, are all appropriate specifications and standards met prior to acceptance and use? (211.165 (d)(f))				
Is there a written testing program implemented to assess the stability characteristics of drug products? (211.166)				
Are written lab testing procedures implemented and followed to determine conformance of sterile and/or pyrogen-free products to such requirements? (211.167(a))				
Are there written and followed lab test procedures regarding presence of foreign particles and harsh/abrasive substances for each batch of ophthalmic ointment? (211.167(b))				
Are there written and followed lab test procedures to determine the conformance of the rate of release of each active ingredient for each batch of controlled-release dosage form? (211.167(c))				
Is an appropriately identified reserve sample (twice needed for specification conformance tests) representative of each lot in each shipment of each active ingredient retained for the appropriate time? (211.170(a))				
Is an appropriately identified reserve sample (twice needed for tests other than sterility/pyrogen) of each lot/batch of drug product retained and stored under conditions consistent with product labeling? (3 years for OTC product, 3-6 months past expiration date for radioactive product, and 1 year after expiration date for others) (211.170(b))				
Is the product reserve sample visually examined at least once a year for evidence of deterioration (unless radioactive or visual examination would affect integrity)? Are the results of				

Additional Notes:

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the examination recorded and maintained with stability data on the product? (211.170 (b))				
Are animals used in testing identified, maintained, and controlled in a manner that assures their suitability for their intended use? Are adequate records maintained showing the history of their use? (211.173)				
If a reasonable possibility exists that a non-penicillin drug product has been exposed to cross-contamination with penicillin, is the non-penicillin drug product tested for the presence of penicillin? (211.176)				
Subpart J—Records and Reports				
Are records associated with a batch of a drug product retained for the appropriate time? (i.e. at least 1 year after the expiration date of the batch or 3 years after distribution of OTC drug products lacking expiration dating) (211.180(a))				
Are records available for authorized inspection? (211.180(c))				
Are procedures established to assure that responsible officials are notified in writing of any investigations, recalls, reports of FDA inspections, or regulatory actions brought by the FDA? (211.180(f))				
Is a written record of major equipment cleaning, maintenance, and use included in individual equipment logs that show the date, time, product, and lot number of each batch processed? Is it dated and signed/initialed indicating that the work was performed? (211.182)				

Additional Notes:

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Do records contain the identity and quantity of each shipment, name of the supplier, supplier lot numbers (if known), receiving code, receipt date, and name and location of the prime manufacturer if different from supplier? (211.184(a))				
Do records contain the results of any test performed and the conclusions derived? (211.184(b))				
Do records include an individual inventory record of each component, container, and closure? (211.184(c))				
Do records include documentation of the examination and review of labels and labeling? (211.184(d))				
Do records include the disposition of rejected components, drug product containers, closure, and labeling? (211.184(e))				
Are master production and control records for each drug product prepared, dated, and signed by one person and independently checked, dated, and signed by a second person? Is the preparation of master production and control records described in a written procedure that is followed? (211.186(a))				
Do master production and control records include: - Name and strength of the product and description of the dosage form - Name and weight or measure of each active ingredient per dosage unit and a statement of the total weight or measure of any dosage unit - Complete list of components designated by names or codes - Accurate statement of the weight/measure of component				

Additional Notes:

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- Statement concerning any calculated excess of component - Statement of theoretical weight or measure at appropriate processing phases - Statement of theoretical yield (including max and min percentages beyond which investigation is required) - Description of the containers, closures, packaging materials, and labels - Complete manufacturing and control instructions, sampling and testing procedures, specifications, special notations, and precautions to be followed (211.186(b))				
Are batch production and control records prepared for each batch of drug product produced? (211.188)				
Do batch production and control records include accurate reproduction of the appropriate master production or control record and documentation that each significant step was accomplished including dates, identity of used equipment and lines, sampling performed, etc.? (211.188)				
Are all drug product production and control records reviewed and approved by QC? Are any unexplained discrepancies or failures to meet specifications thoroughly investigated? (211.192)				
Do laboratory records include complete data derived from all tests, including description of samples, methods, data, calculations, results, and appropriate signatures? (211.194(a))				
Are complete records maintained of any modification of an established test method? (211.194(b))				

Additional Notes:

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Are complete records maintained regarding testing and standardization of lab reference standards, reagents, and standard solutions? (211.194(c))				
Are complete records maintained of periodic calibration of lab instruments and devices? (211.194(d))				
Are complete records maintained of all stability testing performed? (211.194(e))				
Do distribution records contain the name and strength of the product, description of the dosage form, name and address of the consignee, date and quantity shipped, and lot/control number of the product? (211.196)				
Are there written procedures describing the handling of all written and oral complaints regarding a drug product? Are they followed? (211.198(a))				
Are written records of complaints maintained in a file designated for drug product complaints? (211.198(b))				
Do written records include the name and strength of the product, lot number, name of complainant, nature of complaint, and reply to complaint? (211.198(b))				
Do complaint records include findings of investigations and follow up? Where investigations are not conducted, does the record include justification? (211.198(b))				
Subpart K—Returned and Salvaged Drug Products				
Are there written procedures for the holding, testing, and reprocessing of returned drug products, and are they followed? (211.204)				

Additional Notes:

Requirement	Yes	No	N/A	Comments
When returned product or its container, carton, or labeling is doubtful on the safety identity, strength, quality, or purity of the product, is the returned product destroyed unless investigation proves the product meets appropriate standards? (211.204)				
Are drug products that have been subjected to improper storage conditions prevented from being salvaged? Where drug products may have been subjected to improper storage conditions, are they prevented from being salvaged unless there is evidence from lab tests that the drug meets all standards/specifications and evidence that the products /packaging were not subjected to improper storage conditions? Are records including name, lot number, and disposition maintained? (211.208)				

Please note: The above Checklist is provided as an example only. Please reference the applicable standard / regulation for additional details.

Additional Notes: