MEMORANDUM

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service Food and Drug Administration ter for Piologies Evolution and Passarch

Center for Biologics Evaluation and Research

DATE:

FEB 1 | 1999

FROM:

Sharon O'Callaghan, CSO,

Division of Inspections and Surveillance (HFM-650)

SUBJECT:

Error and Accident Reports - Summary for Fourth Quarter FY98

TO:

Acting Director, Division of Inspections and Surveillance (HFM-650)

Between July 1, 1998 and September 30, 1998, the Division of Inspections and Surveillance received 1,720 error and accident reports from the American Red Cross (ARC), 1,480 error and accident reports from non-ARC licensed blood establishments, 57 error and accident reports from unlicensed registered blood establishments, 269 error and accident reports from plasma centers, 7 reports from transfusion services, 6 reports from blood derivative manufacturers, 9 reports from in-vitro diagnostic manufacturers, and 1 report from an allergenic manufacturer. A total of 3,549 error and accident reports were received. There were 460 (13.0%) reports forwarded to the District Offices for follow-up and evaluation as potential recall situations. Based on the information submitted in the error and accident reports, 236 (6.7%) reports did not appear to meet the threshold for reporting, i.e., products were not made available for distribution or the safety, purity, or potency of a product was not affected.

Between October 1, 1997 and September 30, 1998, the Division of Inspections and Surveillance received a total of 13,232 error and accident reports. There were 1692 (12.8%) reports forwarded to the District Offices for follow-up and evaluation as potential recall situations. Based on the information submitted in the error and accident reports, 903 (6.8%) reports did not appear to meet the threshold for reporting, i.e., products were not made available for distribution or the safety, purity, or potency of a product was not affected.

Attached are tables and charts that identify the types of reportable and non-reportable errors and accidents submitted. Examples of errors and accidents in the top three categories are provided. A table and graphs representing reportable errors and accidents are also provided that illustrate the distribution of the reporting time, i.e., time from the date the error or accident was discovered to the date CBER received the report.

Attachments

1 - Table - Total Error/Accident Reports

All Reporting Establishments

2 - Tables - Types of Errors/Accidents

Blood and Plasma Establishments

Total Reports, Potential Recalls

3 - Tables - Types of Errors/Accidents

Non-Blood Manufacturers

4 - Pie charts - All Blood and Plasma Establishments

Total Reports

5 - Pie charts - All Blood and Plasma Establishments

Potential Recalls

6 - Pie charts - Types of Errors/Accidents

ARC

7 - Pie charts - Types of Errors/Accidents

Non-ARC Licensed Blood Banks

8 - Pie charts - Types of Errors/Accidents

Unlicensed Blood Banks

9 - Pie charts - Types of Errors/Accidents

Plasma Centers

10 - Pie charts - Types of Errors/Accidents

Blood Banks, Plasma Centers

11 - Pie charts - Types of Errors/Accidents

Licensed Blood Banks, Unlicensed Blood Banks, Plasma Centers

12 - Tables - Types of Errors/Accidents

Blood and Plasma Establishments

Non-Reportable, Reportable, Total

13 - Pie charts - Types of Errors/Accidents

Reportable E/A's

14 - List - Top Three Categories of Reportable Errors/Accidents

Year-To-Date

15 - Pie charts - Types of Errors/Accidents

Non-Reportable E/A's

16 - List - Top Three Categories of Non-Reportable Errors/Accidents

Year-To-Date

17 - Tables - Reporting Time

18 - Line graphs - Reporting Time

All Reporting Blood Establishments

19 - Line graphs - Reporting Time

ARC

20 - Line graphs - Reporting Time

Non-ARC Licensed Blood Banks

21 - Line graphs - Reporting Time

Unlicensed Blood Banks

22 - Line graphs - Reporting Time

Plasma Centers

23 - Line graphs - Reporting Time

All Licensed Blood Banks

FOURTH QUARTER - FY98

ALL REPORTING ESTABLISHMENTS

	TOTAL REPO	ORTS RECEIVED	POTENTIAL	RECALLS
	FOURTH	YEAR-TO-DATE	FOURTH	YEAR-TO-DATE
	QUARTER		QUARTER	
AMERICAN RED CROSS	1720	6035	124	528
NON-ARC LICENSED BLOOD BANKS	1480	5819	299	1045
UNLICENSED BLOOD BANKS	57	211	6	18
TRANSFUSION SERVICES	7	19	0	0
PLASMA CENTERS	269	1103	23	86
BLOOD DERIVATIVE MANUFACTURER	6	17	0	0
IN-VITRO DIAGNOSTIC MANUFACTURER	9	19	7	12
VACCINE MANUFACTURER	0	3	0	0
ALLERGENICS MANUFACTURER	1	3	1	3
THERAPEUTICS MANUFACTURER	0	3	0	0
TOTAL	3549		460	
TOTAL - YEAR-TO-DATE 10/1/97 - 9/30/98		13232		1692

The following tables and pie charts show the type of errors and accidents reported:

FOURTH QUARTER - FY98 **BLOOD AND PLASMA ESTABLISHMENTS**

TOTAL ERRORS AND ACCIDENTS

TYPE OF ERROR/ACCIDENT	ARC	NON-ARC LICENSED	UNLICENSED	TRANSFUSION	PLASMA	TC	TAL
		BLOOD BANKS	BLOOD BANKS	SERVICES	CENTERS		
ROUTINE TESTING	31	52	2	0	0	85	2.4%
VIRAL TESTING	17	135	3	0	1	156	4.4%
COLLECTION	33	11	1	0	0	45	1.3%
COMPONENT PREPARATION	20	24	1	1	0	46	1.3%
LABELING	148	160	10	0	0	318	9.0%
DONOR SCREENING	63	130	2	0	21	216	6.1%
DONOR DEFERRAL	4	8	2	0	6	20	0.6%
POST DONATION INFO	1228	753	10	0	203	2194	62.1%
STORAGE/DISTRIBUTION	136	168	14	6	14	338	9.6%
MISCELLANEOUS	40	39	12	0	24	115	3.3%
TOTAL	1720	1480	57	7	269	3533	100%

POTENTIAL RECALLS

I OTENTIAL RECALES											
TYPE OF ERROR/ACCIDENT	ARC			TRANSFUSION			OTAL				
		BLOOD BANKS	BLOOD BANKS	SERVICES	CENTERS						
ROUTINE TESTING	0	0	0	0	0	0	0.0%				
VIRAL TESTING	4	127	1	0	0	132	29.2%				
COLLECTION	9	6	0	0	0	15	3.3%				
COMPONENT PREPARATION	14	11	0 .	0	0	25	5.5%				
LABELING	19	28	1	0	0	48	10.6%				
DONOR SCREENING	36	67	1	0	11	115	25.4%				
DONOR DEFERRAL	3	7	2	0	6	18	4.0%				
POST DONATION INFO	11	4	0	0	1	16	3.5%				
STORAGE/DISTRIBUTION	28	48	1	0	5	82	18.1%				
MISCELLANEOUS	0	1	0	0	0	1	0.2%				
TOTAL	124	299	6	0	23	452	100%				

FOURTH QUARTER - FY98
NON-BLOOD MAUFACTURERS

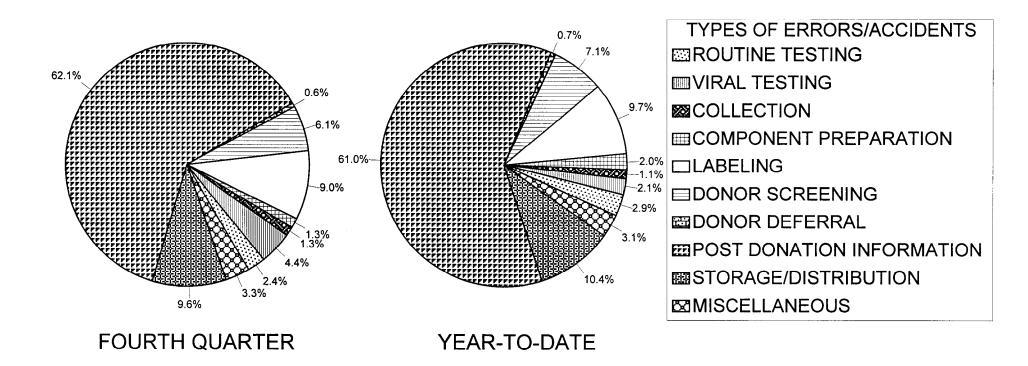
	DERIVATITVE		IN-V	/ITRO	VAC	CCINE	ALLE	RGENIC	THER/	PUETIC	TC	OTAL	POT	ENTIAL
			DIAG	NOSTIC							REF	PORTS	RE	CALL
TYPE OF ERROR/ACCIDENT	TOTAL	RECALL	TOTAL	RECALL	TOTAL	RECALL	TOTAL	RECALL	TOTAL	RECALL				
REAGENT PERFORMANCE	0	0	1	1	0	0	0	0	0	0	1	6.3%	1	12.5%
STERILITY COMPROMISED	0	0	1 `	1	0	0	0	0	0	0	1	6.3%	1	12.5%
LABELING	0	0	4	3	0	0	1	1	0	0	5	31.3%	4	50.0%
STORAGE/DISTRIBUTION	2	0	1	1	0	0	0	0	0	0	3	18.8%	1	12.5%
MISCELLANEOUS	4	0	2	1	0	0	0	0	0	0	6	37.5%	1	12.5%
NON-REPORTABLE	0	0	0	0	0	0	0	0	0	0	0	0.0%	0	0.0%
TOTAL	6	0	9	7	0	0 .	1	1	0	0	16	100%	8	100%

YEAR-TO-DATE - FY98 NON-BLOOD MAUFACTURERS

	DERIV	ATITVE		ITRO NOSTIC	VACCINE ALLERGENI		RGENIC	THERAPUETIC			OTAL PORTS		ENTIAL CALL	
TYPE OF ERROR/ACCIDENT	TOTAL	RECALL	TOTAL	RECALL	TOTAL	RECALL	TOTAL	RECALL	TOTAL	RECALL			<u> </u>	
REAGENT PERFORMANCE	0	0	1	1	0	0	0	0	0	0	1	2.2%	1	6.7%
STERILITY COMPROMISED	1	.0	1	1	0	0	0	0	2	0	4	8.9%	1	6.7%
LABELING	1	0	8	5	2	0	3	3	0	0	14	31.1%	8	53.3%
STORAGE/DISTRIBUTION	4	0	3	1	0	0	0	0	1	0	8	17.8%	1	6.7%
MISCELLANEOUS	10	0	5	4	1	0	0	0	0	0	16	35.6%	4	26.7%
NON-REPORTABLE	1	0	1	0	0	0	0	0	0	0	2	4.4%	0	0.0%
TOTAL	17	0	19	12	3	0	3	3	3	0	45	100%	15	100%

ERROR AND ACCIDENT REPORTS ALL BLOOD AND PLASMA ESTABLISHMENTS

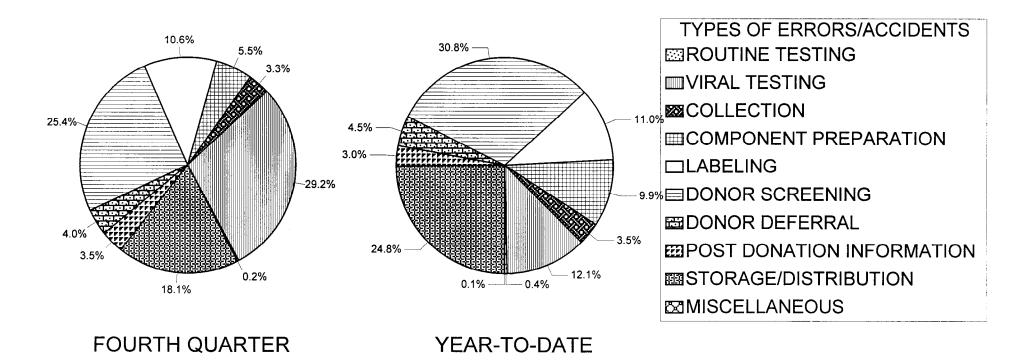
TOTAL REPORTS FY98



REPORTS RECEIVED FOURTH QUARTER (7/1/98 - 9/30/98) = 3533 REPORTS RECEIVED YEAR-TO-DATE (10/1/97 - 9/30/98) = 13,187

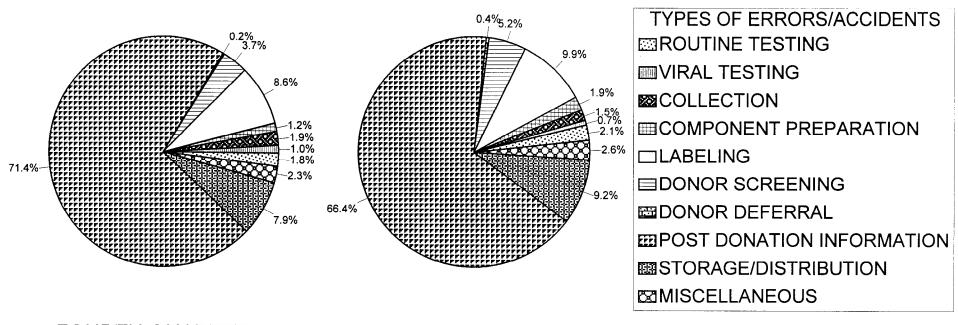
ERROR AND ACCIDENT REPORTS ALL BLOOD AND PLASMA ESTABLISHMENTS POTENTIAL RECALLS

FY98



REPORTS RECEIVED FOURTH QUARTER (7/1/98 - 9/30/98) = 452 REPORTS RECEIVED YEAR-TO-DATE (10/1/97 - 9/30/98) = 1677

AMERICAN RED CROSS FY98

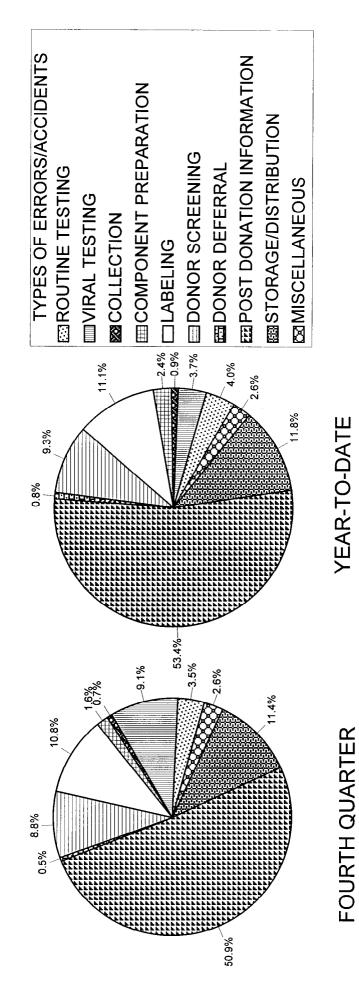


FOURTH QUARTER

YEAR-TO-DATE

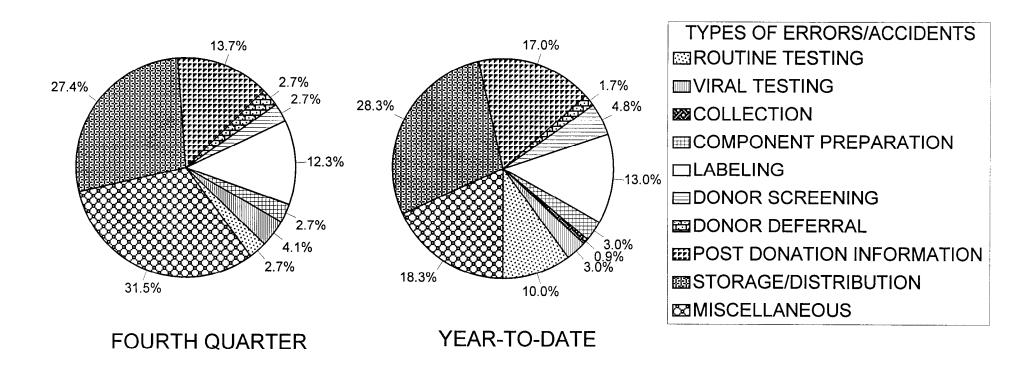
REPORTS RECEIVED FOURTH QUARTER (7/1/98 - 9/30/98) = 1720 REPORTS RECEIVED YEAR-TO-DATE (10/1/97 - 9/30/98) = 6035

ERROR AND ACCIDENT REPORTS NON-ARC LICENSED BLOOD BANKS **FY98**



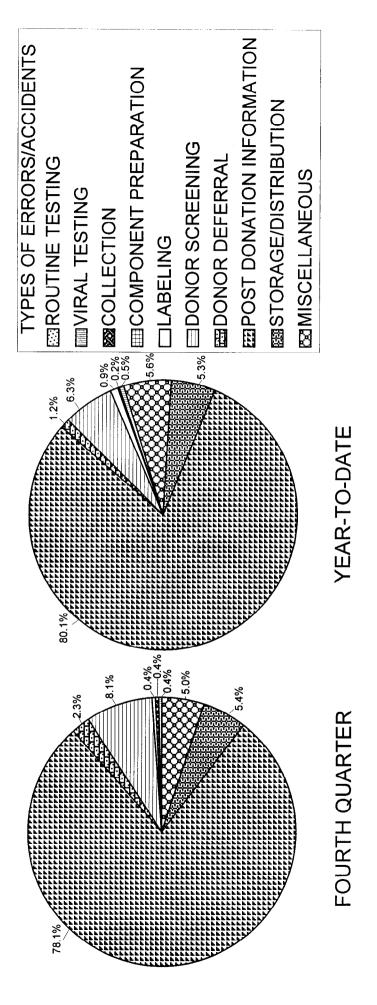
REPORTS RECEIVED FOURTH QUARTER (7/1/98 - 9/30/98) = 1480 REPORTS RECEIVED YEAR-TO-DATE (10/1/97 - 9/30/98) = 5819

UNLICENSED BLOOD BANKS FY98



REPORTS RECEIVED FOURTH QUARTER (7/1/98 - 9/30/98) = 73 (7 REPORTS - TRANSFUSION SERVICES)
REPORTS RECEIVED YEAR-TO-DATE (10/1/97 - 9/30/98) = 230 (19 REPORTS - TRANSFUSION SERVICES)

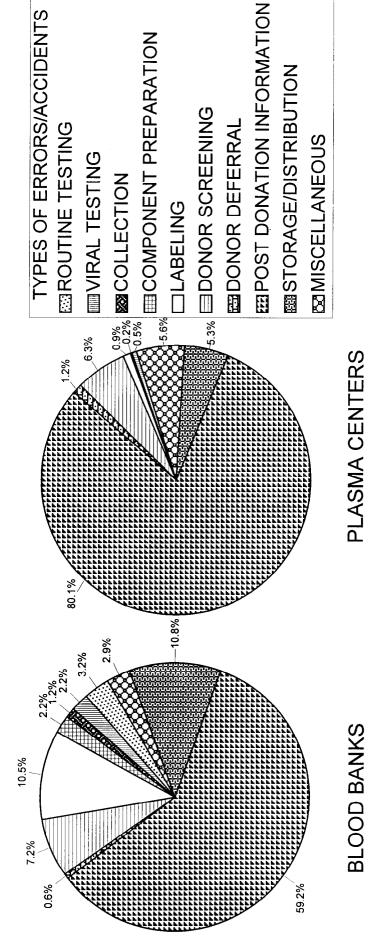
ERROR AND ACCIDENT REPORTS PLASMA CENTERS **FY98**



REPORTS RECEIVED FOURTH QUARTER (7/1/98 - 9/30/98) = 260 REPORTS RECEIVED YEAR-TO-DATE (10/1/97 - 9/30/98) = 1103

ERROR AND ACCIDENT REPORTS **BLOOD BANKS VERSUS PLASMA CENTERS**

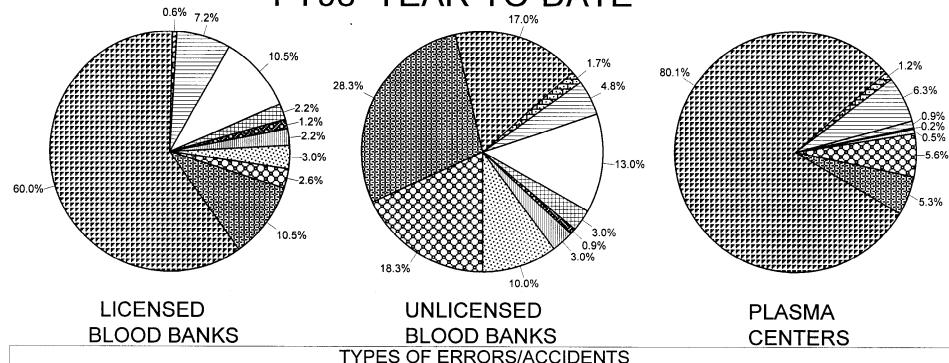




REPORTS RECEIVED 10/1/97 - 9/30/98 BLOOD BANKS = 12,084 PLASMA CENTERS = 1103

ERROR AND ACCIDENT REPORTS BLOOD BANKS VERSUS PLASMA CENTERS

FY98 YEAR-TO-DATE



ROUTINE TESTING

WIVIRAL TESTING

™COLLECTION

■COMPONENT PREPARATION □LABELING

DONOR SCREENING

□ DONOR DEFERRAL

四POST DONATION INFORMATION 國STORAGE/DISTRIBUTION

MISCELLANEOUS

REPORTS RECEIVED 10/1/97 - 9/30/98 LICENSED BLOOD BANKS = 11,854 UNLICENSED BLOOD BANKS= 230 PLASMA CENTERS = 1103

FOURTH QUARTER - FY98 **BLOOD AND PLASMA ESTABLISHMENTS**

TYPE OF ERROR/ACCIDENT	NON-REPORTABLE	REPORTABLE	TOTAL	%NON-REPORTABLE
ROUTINE TESTING	1	84	85	1.2%
VIRAL TESTING	0	156	156	0.0%
COLLECTION	18	27	45	40.0%
COMPONENT PREPARATION	1	45	46	2.2%
LABELING	37	281	318	11.6%
DONOR SCREENING	24	192	216	11.1%
DONOR DEFERRAL	1	19	20	5.0%
POST DONATION INFORMATION	10	2184	2194	0.5%
STORAGE/DISTRIBUTION	33	305	338	9.8%
MISCELLANEOUS	111	4	115	96.5%
TOTAL	236	3297	3533	6.7%

[%]NON-REPORTABLE = Non-Reportable/Total for each category

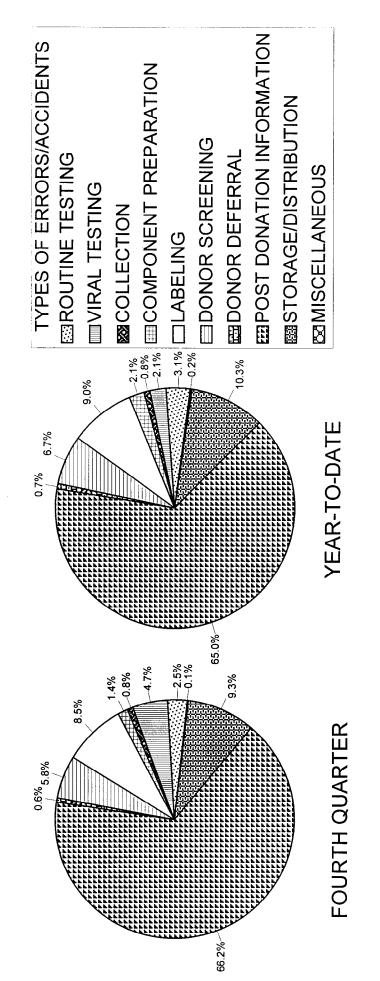
FY98 - YEAR-TO-DATE
BLOOD AND PLASMA ESTABLISHMENTS

TYPE OF ERROR/ACCIDENT	NON-REPORTABLE	REPORTABLE	TOTAL	%NON-REPORTABLE
ROUTINE TESTING	3	380	383	0.8%
VIRAL TESTING	9	263	272	3.3%
COLLECTION	48	101	149	32.2%
COMPONENT PREPARATION	6	256	262	2.3%
LABELING	181	1101	1282	14.1%
DONOR SCREENING	111	824	935	11.9%
DONOR DEFERRAL	3	85	88	3.4%
POST:DONATION INFORMATION	52	7986	8038	0.6%
STORAGE/DISTRIBUTION	107	1261	1368	7.8%
MISCELLANEOUS	381	29	410	92.9%
TOTAL	901	12286	13187	6.8%

[%]NON-REPORTABLE = Non-Reportable/Total for each category

ERROR AND ACCIDENT REPORTS ALL BLOOD AND PLASMA ESTABLISHMENTS REPORTABLE ERRORS/ACCIDENTS

FY98



REPORTS RECEIVED FOURTH QUARTER (7/1/98 - 9/30/98) = 3297 REPORTS RECEIVED YEAR-TO-DATE (10/1/97 - 9/30/98) = 12,286

FY98 YEAR-TO-DATE

REPORTABLE ERRORS/ACCIDENTS - 12,286 (93.2% of total reports)

Top Three Categories of Errors/Accidents:

Post Donation Information - 7986 (65.0% of reportables)

*Examples:

Information provided post donation:

- Donor traveled to a malarial endemic area
- Donor received tattoo, earpiercing, needlestick, or transfusion
- Donor became ill after donation,

not related to hepatitis, HIV, HTLV-I, sexually transmitted diseases or cold/flu symptoms

- Donor had a history of cancer

Storage/Distribution - 1261 (10.3% of reportables)

*Examples:

- Release of product that contained clots or would not flow through a filter
- Product was shipped or stored at incorrect temperature
- Failure to quarantine a unit that was designated to be quarantined due to testing not performed or not documented
- Failure to quarantine a unit that was designated to be quarantined due to unsuitable medical history

Labeling - 1101 (9.0% of reportables)

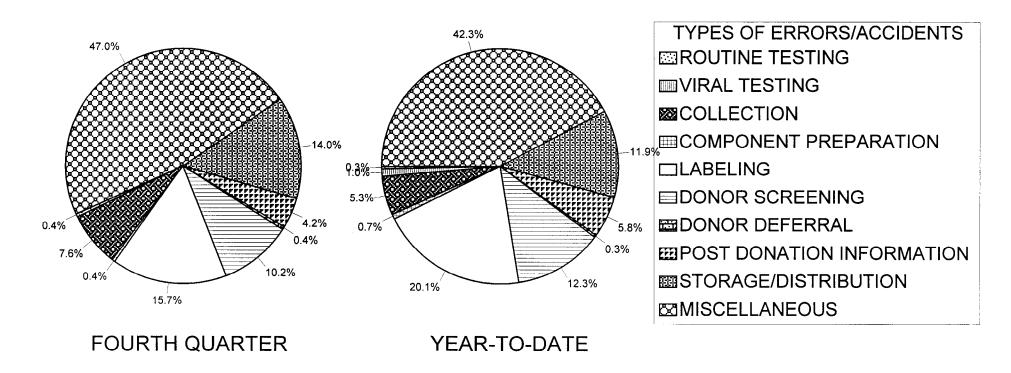
*Examples:

- Additional information on autologous unit incorrect or missing, e.g., name, social security number, or date of birth
- Product labeled with extended expiration date
- Product labeled with incorrect ABO and/or Rh

^{*}Examples of errors and accidents represent at least 50% of reports in each category.

ALL BLOOD AND PLASMA ESTABLISHMENTS NON-REPORTABLE ERRORS/ACCIDENTS

FY98



REPORTS RECEIVED FOURTH QUARTER (7/1/98 - 9/30/98) = 236 REPORTS RECEIVED YEAR-TO-DATE (10/1/97 - 9/30/98) = 901

FY98 YEAR-TO-DATE

NON-REPORTABLE ERRORS/ACCIDENTS - 901 (6.8% of total reports)

Top Three Categories of Errors/Accidents:

Miscellaneous 381 (42.3% of non-reportables)

*Examples:

- No products made available for distribution
- Recordkeeping error/accident record is incorrect or not reviewed, testing and labeling acceptable
- Notification/retrieval procedures not followed (e.g., recall not performed within appropriate time)

Labeling - 181 (20.1% of non-reportables)

*Examples:

- Unit labeled with incorrect weight, volume, collection date, or facility identifiers; unit acceptable
- Unit missing label for ABO/Rh, product, or expiration date
- Unit labeled with a shortened expiration date

Donor Suitability - 111 (12.3% of non-reportables)

*Example:

- Donor did not meet acceptance criteria for time interval between donations Donor did not meet acceptance criteria for age
- Donor did not meet acceptance criteria for total protein or SPE

^{*}Examples of errors and accidents represent at least 50% of reports in each category.

The following table and graphs show the time periods in which the reports were received by CBER. The evaluation of timeliness is limited to only reports that met the threshold for reporting.

ERROR AND ACCIDENT REPORTS FOURTH QUARTER - FY98

NUMBER OF DAYS FROM DATE E/A DISCOVERED TO FDA RECEIVED **BLOOD ESTABLISHMENTS**

CUMULATIVE PERCENT	ARC	NON-ARC	UNLICENSED	PLASMA	TOTAL
OF REPORTS	(DAYS)	LICENSED (DAYS)	(DAYS)	(DAYS)	(DAYS)
10%	15	14	8	12	14
25%	20	21	15	16	20
50%	29	33	23	25	30
75%	40	64	37	55	46
90%	49	128	56	103	81
# REPORTS	1606	1394	48	245	3293
RANGE	7-708	4-1009	4-307	5-265	4-1009

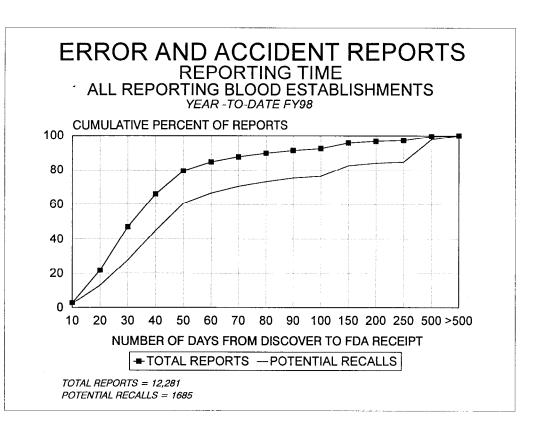
ERROR AND ACCIDENT REPORTS RECEIVED 10/1/97 - 9/30/98

NUMBER OF DAYS FROM DATE E/A DISCOVERED TO FDA RECEIVED **BLOOD ESTABLISHMENTS**

CUMULATIVE PERCENT	ARC	NON-ARC LICENSED	UNLICENSED	PLASMA	TOTAL
OF REPORTS	(DAYS)	(DAYS)	(DAYS)	(DAYS)	(DAYS)
25%	21	21	14	18	21
50%	29	34	24	33	31
75%	40	62	48	71	47
90%	48	119	81	133	80
# REPORTS	5622	5437	176	1046	12281
RANGE	5-708	4-1132	4-727	3-559	3-1132

ERROR AND ACCIDENT REPORTS REPORTING TIME ALL REPORTING BLOOD ESTABLISHMENTS FOURTH QUARTER FY98 CUMULATIVE PERCENT OF REPORTS 100 80 60 40 20 20 30 40 50 60 70 80 90 100 150 200 250 500 NUMBER OF DAYS FROM DISCOVER TO FDA RECEIPT TOTAL REPORTS — POTENTIAL RECALLS

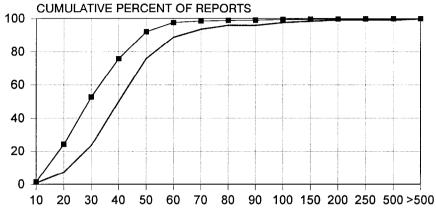
TOTAL REPORTS = 3293 POTENTIAL RECALLS = 452



REPORTING TIME

AMERICAN RED CROSS

FOURTH QUARTER FY98



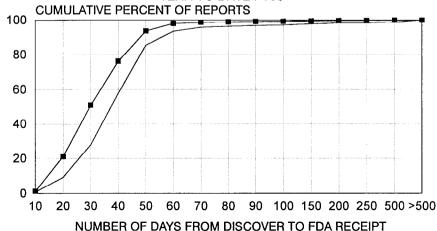
NUMBER OF DAYS FROM DISCOVER TO FDA RECEIPT

■ TOTAL REPORTS —POTENTIAL RECALLS

TOTAL REPORTS = 1606 POTENTIAL RECALLS = 124

ERROR AND ACCIDENT REPORTS

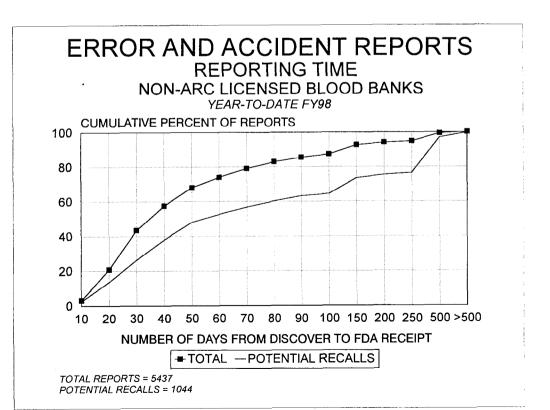
REPORTING TIME AMERICAN RED CROSS YEAR-TO-DATE FY98

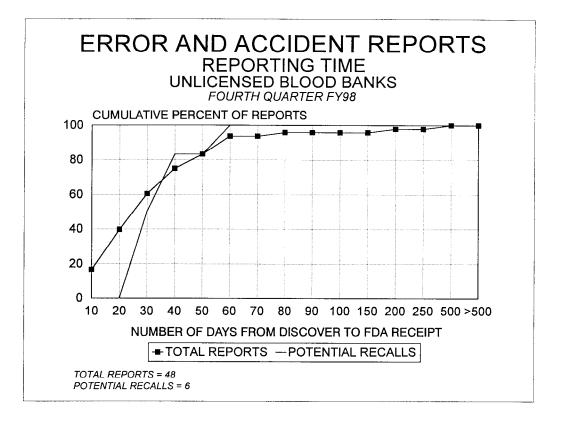


■ TOTAL REPORTS —POTENTIAL RECALLS

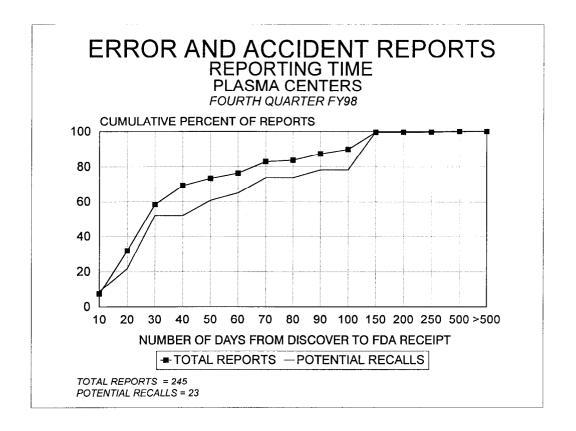
TOTAL REPORTS = 5622 POTENTIAL RECALLS = 528

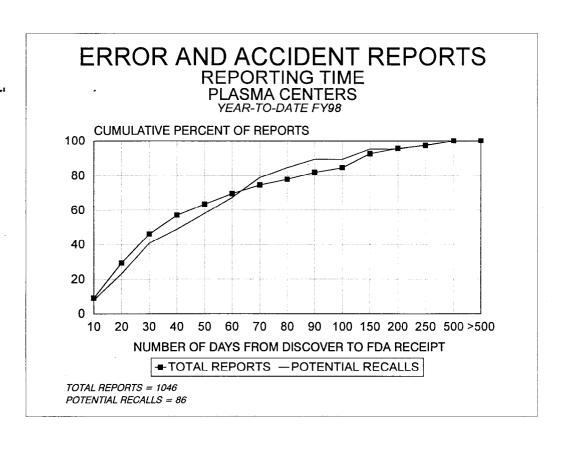
ERROR AND ACCIDENT REPORTS REPORTING TIME NON-ARC LICENSED BLOOD BANKS FOURTH QUARTER FY98 CUMULATIVE PERCENT OF REPORTS 100 80 60 10 20 30 40 50 60 70 80 90 100 150 200 250 500 >500 NUMBER OF DAYS FROM DISCOVER TO FDA RECEIPT TOTAL REPORTS = 1394 POTENTIAL RECALLS = 299



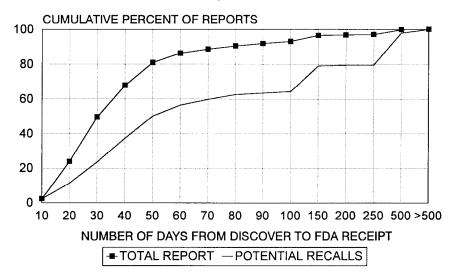


ERROR AND ACCIDENT REPORTS REPORTING TIME UNLICENSED BLOOD BANKS YEAR-TO-DATE FY98 CUMULATIVE PERCENT OF REPORTS 100 10 20 30 40 50 60 70 80 90 100 150 200 250 500 >500 NUMBER OF DAYS FROM DISCOVER TO FDA RECEIPT 107AL REPORTS = 176 POTENTIAL RECALLS = 18





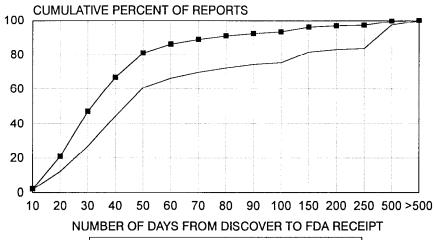
REPORTING TIME ALL LICENSED BLOOD BANKS FOURTH QUARTER FY98



TOTAL REPORTS = 3000 POTENTIAL RECALLS = 423

ERROR AND ACCIDENT REPORTS

REPORTING TIME ALL LICENSED BLOOD BANKS YEAR-TO-DATE FY98



■ TOTAL REPORTS — POTENTIAL RECALLS

TOTAL REPORTS = 11,059 POTENTIAL RECALLS = 1572