MEMORANDUM

# DEPARTMENT OF HEALTH & HUMAN SERVICES Public Health Service Food and Drug Administration

Center for Biologics Evaluation and Research

DATE:

AUG - 2 1999

FROM:

Sharon O'Callaghan, CSO,

Division of Inspections and Surveillance (HFM-650)

SUBJECT:

Error and Accident Reports - Summary for Third Quarter FY99

TO:

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

Between April 1, 1999 and June 30, 1999, the Division of Inspections and Surveillance received 1,570 error and accident reports from the American Red Cross (ARC), 1,641 error and accident reports from non-ARC licensed blood establishments, 25 error and accident reports from unlicensed registered blood establishments, 11 reports from transfusion services, 597 error and accident reports from plasma centers, 15 reports from blood derivative manufacturers, 3 reports from an in-vitro diagnostic manufacturers, 4 reports from vaccine manufacturers, 6 reports from allergenics manufacturers, and 3 reports from therapeutic manufacturers. A total of 3,875 error and accident reports were received. There were 300 (7.7%) 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, 168 (4.3%) 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, 1998 and June 30, 1999, the Division of Inspections and Surveillance received a total of 11,574 error and accident reports. There were 1,407 (12.2%) 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, 558 (4.8%) 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

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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 Establishments

# THIRD QUARTER - FY99 **ALL REPORTING ESTABLISHMENTS**

·	TOTAL REPO	ORTS RECEIVED	POTENTIAL	RECALLS
	THIRD	YEAR-TO-DATE	THIRD	YEAR-TO-DATE
	QUARTER		QUARTER	
AMERICAN RED CROSS	1570	4868	105	339
NON-ARC LICENSED BLOOD BANKS	1641	5104	147	916
UNLICENSED BLOOD BANKS	25	109	2	15
TRANSFUSION SERVICES	11	23	0	0
PLASMA CENTERS	597	1401	38	119
BLOOD DERIVATIVE MANUFACTURER	15	29	5	6
IN-VITRO DIAGNOSTIC MANUFACTURER	3	13	0	4
VACCINE MANUFACTURER	4	7	0	1
ALLERGENICS MANUFACTURER	6	10	3	4
THERAPEUTIC MANUFACTURER	3	10	0	3
TOTAL	3875		300	
TOTAL - YEAR-TO-DATE 10/1/98 - 6/30/99		11574		1407

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

# THIRD QUARTER - FY99 BLOOD AND PLASMA ESTABLISHMENTS

### TOTAL ERRORS AND ACCIDENTS

TYPE OF ERROR/ACCIDENT	ARC	NON-ARC LICENSED	UNLICENSED TRANSFUSION		PLASMA	ТО	TAL
		BLOOD BANKS	BLOOD BANKS	SERVICES	CENTERS		1
ROUTINE TESTING	25	48	3	1	0	77	2.0%
VIRAL TESTING	7	11	0	0	1	19	0.5%
COLLECTION	19	11	0	0	1	31	0.8%
COMPONENT PREPARATION	17	27	2	0	0	46	1.2%
LABELING	127	132	3	3	1	266	6.9%
DONOR SCREENING	53	113	0	0	44	210	5.5%
DONOR DEFERRAL	10	8	0	0	2	20	0.5%
POST DONATION INFO	1179	1090	4	0	522	2795	72.7%
STORAGE/DISTRIBUTION	110	175	10	7	23	325	8.5%
MISCELLANEOUS	23	26	3	0	3	55	1.4%
TOTAL	1570	1641	25	11	597	3844	100%

### POTENTIAL RECALLS

TYPE OF ERROR/ACCIDENT	ARC	NON-ARC LICENSED	UNLICENSED	TRANSFUSION	PLASMA	TC	OTAL
		BLOOD BANKS	BLOOD BANKS	SERVICES	CENTERS		
ROUTINE TESTING	1	0	0	0	0	1	0.3%
VIRAL TESTING	3	5	0	0	1	9	3.1%
COLLECTION	4	3	0	0	1	8	2.7%
COMPONENT PREPARATION	11	11	0	0	0	22	7.5%
LABELING	11	16	0	0	0	27	9.2%
DONOR SCREENING	33	70	0	0	18	121	41.4%
DONOR DEFERRAL	5	8	0	0	2	15	5.1%
POST DONATION INFO	18	4	0	0	3	25	8.6%
STORAGE/DISTRIBUTION	19	30	2	0	13	64	21.9%
MISCELLANEOUS	0	0	0	0	0	0	0.0%
TOTAL	105	147	2	0	38	292	100%

# THIRD QUARTER - FY99 NON-BLOOD MAUFACTURERS

	DERIVATITVE				VAC	CINE	TOTAL		POTENTIAL					
			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	0	0	0	0	0	0	0	0	0	0.0%	0	0.0%
STERILITY COMPROMISED	2	0	0	0	0	0	0	0	1	0	3	9.7%	0	0.0%
LABELING	1	1	2	0	3	3	1	0	0	0	7	22.6%	4	50.0%
STORAGE/DISTRIBUTION	0	0	1	0	1	0	0	0	0	0	2	6.5%	0	0.0%
MISCELLANEOUS	11	4	0	0	2	0	2	0	3	0	18	58.1%	4	50.0%
NOT REPORTABLE	11	0	0	0	0	0	0	0	0	0	1	3.2%	0	0.0%
TOTAL	15	5	3	0	6	3	3	0	4	0	31	100%	8	100%

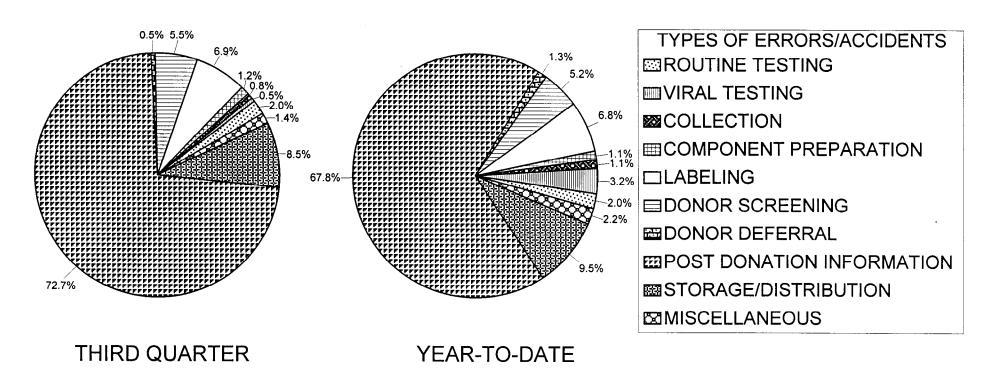
### YEAR-TO-DATE - FY99

### NON-BLOOD MAUFACTURERS

	DERIV	'ATITVE	ł .	ITRO NOSTIC	ALLEF	RGENIC	THERA	PUETIC	VAC	CINE		OTAL PORTS		ENTIAL 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	1.4%	1	5.6%
STERILITY COMPROMISED	3	0	2	1	1	0	3 ·	3	1	0	10	14.5%	4	22.2%
LABELING	2	1	7	2	6	4	1	0	0	0	16	23.2%	7	38.9%
STORAGE/DISTRIBUTION	2	0	1	0	1	0	1	0	1	0	6	8.7%	0	0.0%
MISCELLANEOUS	21	5	1	0	2	0	5	0	4	1	33	47.8%	6	33.3%
NOT REPORTABLE	0	0	1	0	0	0	0	0	1	0	3	4.3%	0	0.0%
TOTAL	28	6	13	4	10	4	10	3	7	1	69	100%	18	100%

### ALL BLOOD AND PLASMA ESTABLISHMENTS

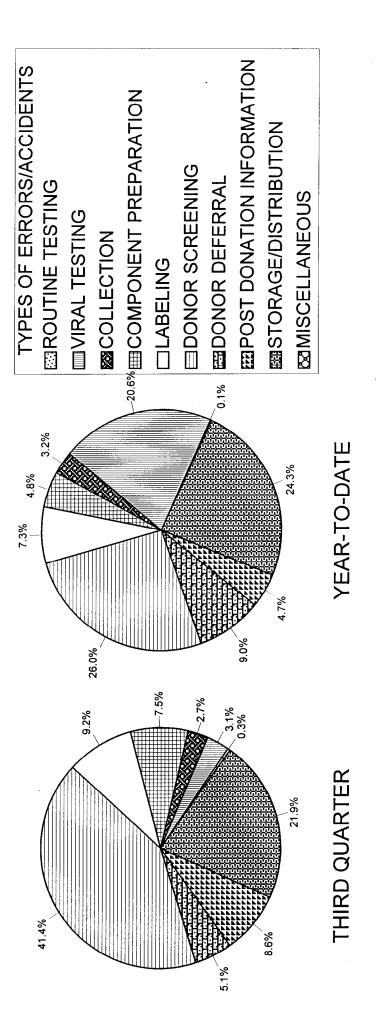
### TOTAL REPORTS FY99



REPORTS RECEIVED THIRD QUARTER (4/1/99 - 6/30/99) = 3844 REPORTS RECEIVED YEAR-TO-DATE (10/1/98 - 6/30/99) = 11,505

# ERROR AND ACCIDENT REPORTS ALL BLOOD AND PLASMA ESTABLISHMENTS POTENTIAL RECALLS

**FY99** 



REPORTS RECEIVED YEAR-TO-DATE (10/1/98 - 6/30/99) = 1389 REPORTS RECEIVED THIRD QUARTER (4/1/99 - 6/30/99) = 292

### THIRD QUARTER - FY99

### **BLOOD AND PLASMA ESTABLISHMENTS**

TYPE OF ERROR/ACCIDENT	NON-REPORTABLE	REPORTABLE	TOTAL	%NON-REPORTABLE
ROUTINE TESTING	0	77	77	0.0%
VIRAL TESTING	0	19	19	0.0%
COLLECTION	9	22	31	29.0%
COMPONENT PREPARATION	0	46	46	- 0.0%
LABELING	42	224	266	15.8%
DONOR SCREENING	21	189	210	10.0%
DONOR DEFERRAL	2	18	20	10.0%
POST DONATION INFORMATION	27	2768	2795	1.0%
STORAGE/DISTRIBUTION	15	310	325	4.6%
MISCELLANEOUS	51	4	55	92.7%
TOTAL	167	3677	3844	4.3%

<sup>%</sup>NON-REPORTABLE = Non-Reportable/Total for each category

YEAR-TO-DATE - FY99

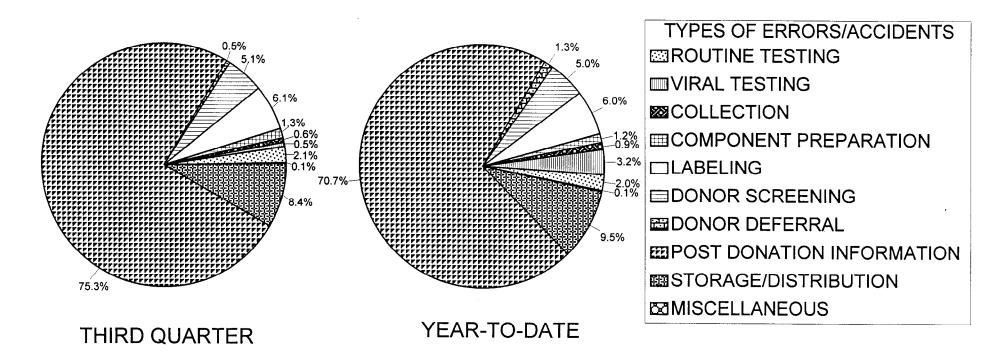
### **BLOOD AND PLASMA ESTABLISHMENTS**

TYPE OF ERROR/ACCIDENT	NON-REPORTABLE	REPORTABLE	TOTAL	%NON-REPORTABLE
ROUTINE TESTING	2	223	225	0.9%
VIRAL TESTING	10	353	363	2.8%
COLLECTION	29	101	130	22.3%
COMPONENT PREPARATION	2	129	131	1.5%
LABELING	121	662	783	15.5%
DONOR SCREENING	49	544	593	8.3%
DONOR DEFERRAL	5	139	144	3.5%
POST DONATION INFO	53	7742	7795	0.7%
STORAGE/DISTRIBUTION	50	1042	1092	4.6%
MISCELLANEOUS	234	15	249	94.0%
TOTAL	555	10950	11505	4.8%

<sup>%</sup>NON-REPORTABLE = Non-Reportable/Total for each category

# ALL BLOOD AND PLASMA ESTABLISHMENTS REPORTABLE ERRORS/ACCIDENTS

**FY99** 



REPORTS RECEIVED THIRD QUARTER (4/1/99 - 6/30/99) = 3677 REPORTS RECEIVED YEAR-TO-DATE (10/1/98 - 6/30/99) = 10,950

### **FY99 YEAR-TO-DATE**

### REPORTABLE ERRORS/ACCIDENTS – 10,950 (95.2% of total reports)

### Top Three Categories of Errors/Accidents:

Post Donation Information - 7742 (70.7% of reportables)

\*Examples:

Information provided post donation:

- Donor received tattoo, earpiercing, accidental needlestick, or transfusion
- Donor traveled to a malarial endemic area
- Donor had a history of cancer
- Donor became ill after donation,

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

Storage/Distribution – 1042 (9.5% 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 incorrect, incomplete, or positive testing
  - Failure to quarantine a unit that was designated to be quarantined due to testing not performed or documented

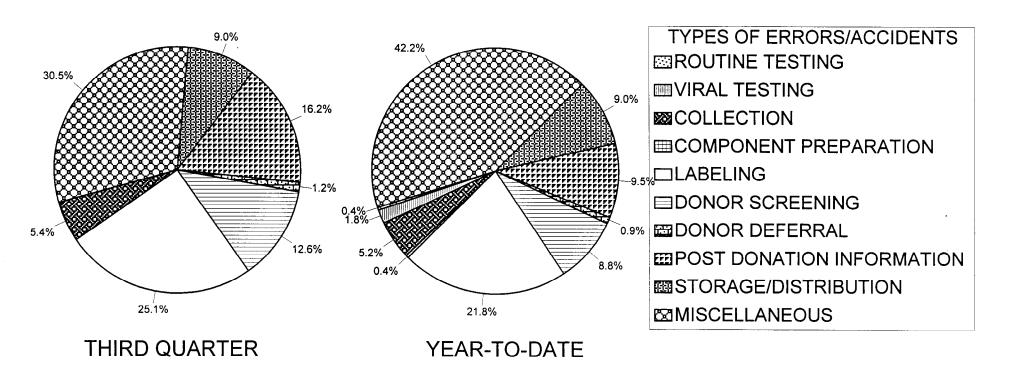
Labeling – 662 (6.0% of reportables)

- \*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
    - Missing or incorrect donor/unit number
    - Incorrect ABO/Rh

<sup>\*</sup>Examples of errors and accidents represent at least 50% of reports in each category.

# ALL BLOOD AND PLASMA ESTABLISHMENTS NON-REPORTABLE ERRORS/ACCIDENTS

**FY99** 



REPORTS RECEIVED THIRD QUARTER (4/1/99 - 6/30/99) = 167 REPORTS RECEIVED YEAR-TO-DATE (10/1/98 - 6/30/99) = 555

### **FY99 YEAR-TO-DATE**

### NON-REPORTABLE ERRORS/ACCIDENTS - 555 (4.8% of total reports)

### Top Three Categories of Errors/Accidents:

Miscellaneous 234 (42.2% of non-reportables)

### \*Examples:

- No products made available for distribution
- Notification/retrieval procedures not followed (e.g., notification not performed within appropriate time)
- Routine quality control (e.g., QC for scale, centrifuge, temperatures) not performed or inadequate, does not include product, viral marker, or ABO/Rh QC

Labeling - 121 (21.8% of non-reportables)

### \*Examples:

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

Post Donation Information (9.5% of non-reportables)

### \*Example:

- Post donation cold/flu symptoms
- Donor pregnant

<sup>\*</sup>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 THIRD QUARTER - FY99

### 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)
10%	16	15	7	12	14
25%	21	21	15	16	21
50%	28	34	33	28	30
75%	38	71	93	50	47
90%	48	160	127	97	97
# REPORTS	1477	1581	33	579	3670
RANGE	1-264	5-2385	1-237	4-3301	1-3301

### ERROR AND ACCIDENT REPORTS RECEIVED 10/1/98 - 6/30/99

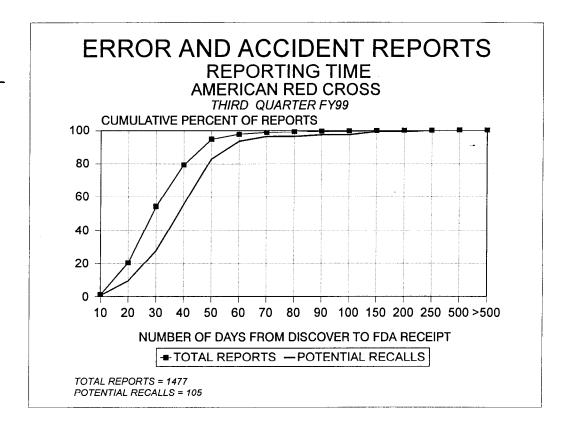
### NUMBER OF DAYS FROM DATE E/A DISCOVERED TO FDA RECEIVED **BLOOD ESTABLISHMENTS**

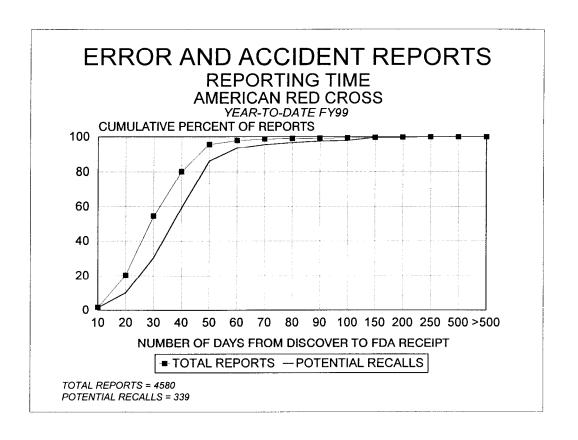
CUMULATIVE PERCENT	ARC	NON-ARC LICENSED	UNLICENSED	PLASMA	TOTAL
OF REPORTS	(DAYS)	(DAYS)	(DAYS)	(DAYS)	(DAYS)
10%	16	15	7	12	14
25%	21	22	14	16	21
50%	28	36	32	28	31
75%	38	86	80	53	48
90%	47	316	197	123	117
# REPORTS	4580	4891	97	1364	10932
RANGE	1-383	3-2385	1-831	4-3301	1-3301

### **ERROR AND ACCIDENT REPORTS** REPORTING TIME ALL REPORTING BLOOD ESTABLISHMENTS THIRD QUARTER FY99 **CUMULATIVE PERCENT OF REPORTS** 100 80 60 40 20 0 40 50 60 70 80 90 100 150 200 250 500 >500 20 30 NUMBER OF DAYS FROM DISCOVER TO FDA RECEIPT **■** TOTAL REPORTS —POTENTIAL RECALLS

TOTAL REPORTS = 3670 POTENTIAL RECALLS = 287

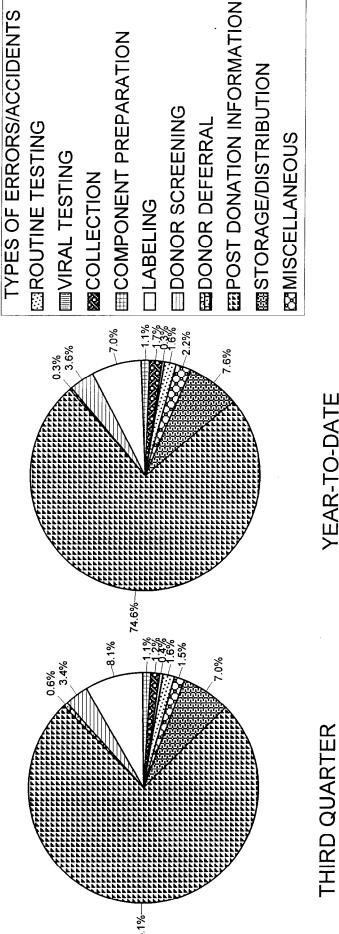
### **ERROR AND ACCIDENT REPORTS** REPORTING TIME ALL REPORTING BLOOD ESTABLISHMENTS YEAR -TO-DATE FY99 **CUMULATIVE PERCENT OF REPORTS** 100 80 60 40 20 0 30 40 50 60 70 80 90 100 150 200 250 500 >500 NUMBER OF DAYS FROM DISCOVER TO FDA RECEIPT **■** TOTAL REPORTS —POTENTIAL RECALLS TOTAL REPORTS = 10,932 POTENTIAL RECALLS = 1381





# ERROR AND ACCIDENT REPORTS **AMERICAN RED CROSS**

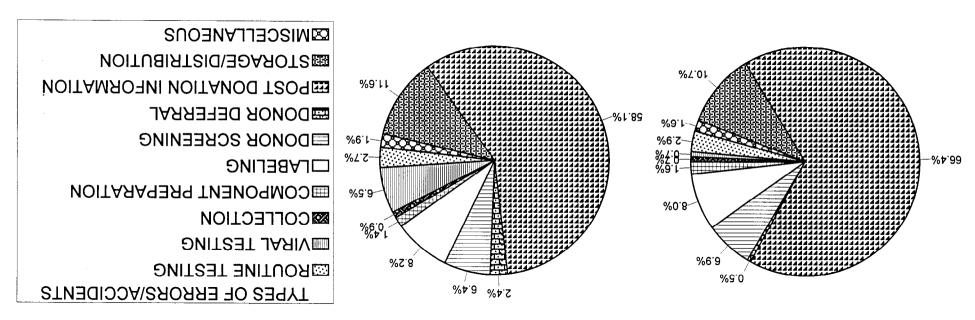
**FY99** 



YEAR-TO-DATE

REPORTS RECEIVED THIRD QUARTER (4/1/99 - 6/30/99) = 1570 REPORTS RECEIVED YEAR-TO-DATE (10/1/98 - 6/30/99) = 4868

# EKBOR AND ACCIDENT REPORTS | FROM PROPERTY | FROM PRINTER | PROPERTY | PROPE

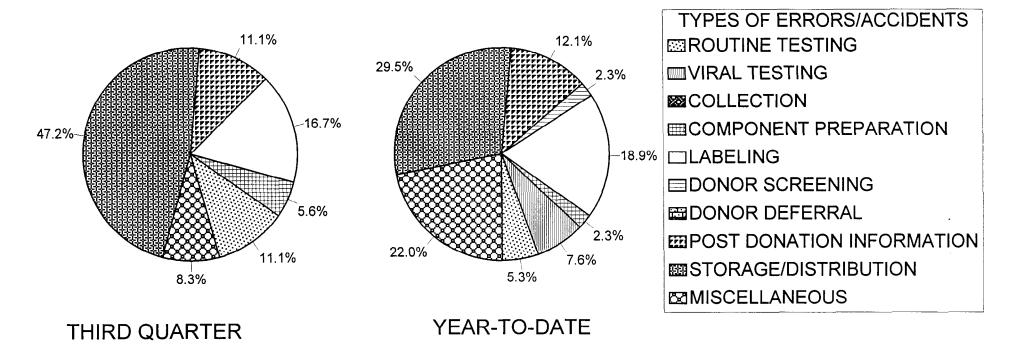


**JTAG-OT-AA3Y** 

THIRD QUARTER

REPORTS RECEIVED YEAR-TO-DATE (10/1/99 - 6/30/99) = 5104

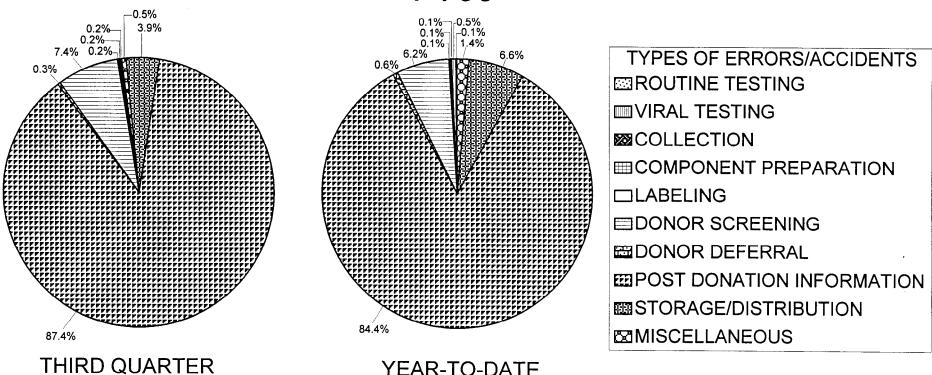
### UNLICENSED BLOOD BANKS FY99



REPORTS RECEIVED THIRD QUARTER (4/1/99 - 6/30/99) = 36 (11 REPORTS - TRANSFUSION SERVICES)
REPORTS RECEIVED YEAR-TO-DATE (10/1/98 - 6/30/99) = 132 (23 REPORTS - TRANSFUSION SERVICES)

# PLASMA CENTERS

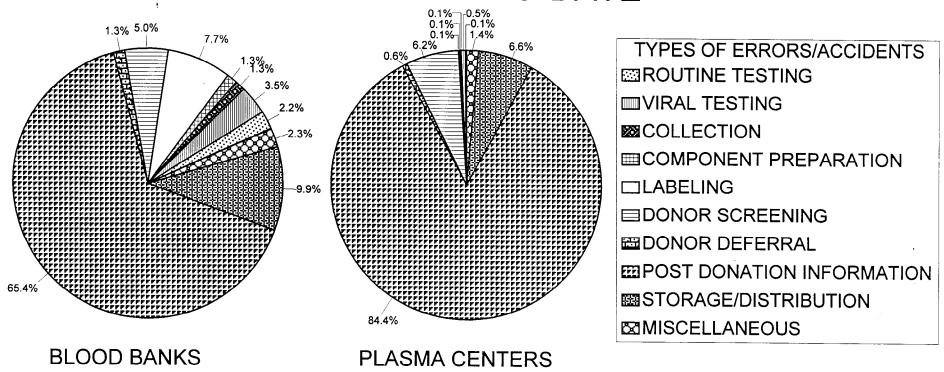




REPORTS RECEIVED THIRD QUARTER (4/1/99 - 6/30/99) = 597 REPORTS RECEIVED YEAR-TO-DATE (10/1/98 - 6/30/99) = 1401

### BLOOD BANKS VERSUS PLASMA CENTERS

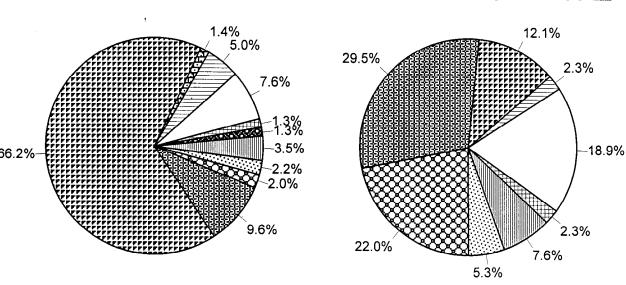
### FY99 YEAR-TO-DATE

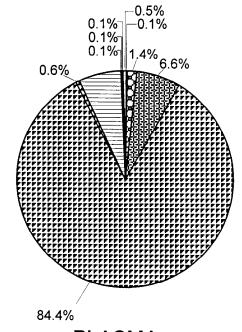


REPORTS RECEIVED 10/1/98 - 6/30/99 BLOOD BANKS = 10,104 PLASMA CENTERS = 1401

### **BLOOD BANKS VERSUS PLASMA CENTERS**

FY99 YEAR-TO-DATE





LICENSED BLOOD BANKS UNLICENSED BLOOD BANKS

PLASMA CENTERS

TYPES OF ERRORS/ACCIDENTS

**⊠ROUTINE TESTING** 

**WIRAL TESTING** 

**™**COLLECTION

**■COMPONENT PREPARATION** □LABELING

III VII VAL TEOTING

**DONOR SCREENING** 

☐ DONOR DEFERRAL

™ MISCELLANEOUS

REPORTS RECEIVED 10/1/98 - 6/30/99 LICENSED BLOOD BANKS = 9972 UNLICENSED BLOOD BANKS= 132 PLASMA CENTERS = 1401

