DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
19701 Fairchild Irvine, CA 92612-2445 (949) 608-2900 Fax: (949) 608-4417	8/2/2021-8/13/2021* FEI NUMBER 3012890460

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Christopher Dinoffria, Director of Compliance

FIRM NAME	STREET ADDRESS
Optum Compounding Services, LLC	24416 N 19th Ave
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED
Phoenix, AZ 85085-1887	Outsourcing Facility

This document lists observations made by the FDA representative(s) during the inspection of your facility. They are inspectional observations, and do not represent a final Agency determination regarding your compliance. If you have an objection regarding an observation, or have implemented, or plan to implement, corrective action in response to an observation, you may discuss the objection or action with the FDA representative(s) during the inspection or submit this information to FDA at the address above. If you have any questions, please contact FDA at the phone number and address above.

DURING AN INSPECTION OF YOUR FIRM WE OBSERVED:

OBSERVATION 1

The quality control unit lacks responsibility to approve and reject all procedures or specifications impacting on the identity, strength, quality and purity of drug products.

Specifically,

A) The visual inspection program is inadequate to ensure defected/non-conforming syringes can be accurately rejected. For example:

1. Bevacizumab 2mg/0.08mL lot #138-20213103@12 was 100% visually inspected on 04/07/21 and 04/16/21 resulting in (b) (4) non-conforming units out of a total of (b) (4) resulting in a rejectable defect of (b) (4)%. The specification is (b) (4) %. The non-conforming units were identified as follows:

Fibers/Lint	Black Particles	White Particles	Clear Particles	Barrel defects	Plunger defects	Leakage behind the plunger
(b) (4)						

The acceptable units from this batch were re-inspected on 04/20/21 resulting in an additional (b) (4) non-conforming units out of a total of (b) (4) resulting in a rejectable defect of (b) (4)%. The specification for a re-inspection is (b) (4) %. The non-conforming units were identified as follows:

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE		DATE ISSUED
	Darren S Brown, Investigator Jeffrey P Raimondi, Investigator	X Darren S Brown Investigator Signed By: 2001847760 Date Signed: 08-13-2021 14:39:09	8/13/2021

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
19701 Fairchild Irvine, CA 92612-2445 (949) 608-2900 Fax: (949) 608-4417	8/2/2021-8/13/2021* FEI NUMBER 3012890460

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Christopher Dinoffria, Director of Compliance

FIRM NAME	STREET ADDRESS
Optum Compounding Services, LLC	24416 N 19th Ave
CITY, STATE, ZIP CODE, COUNTRY Phoenix, AZ 85085-1887	TYPE ESTABLISHMENT INSPECTED Outsourcing Facility

Fibers/Lint	White Particles	Clear Particles	Barrel defects	Plunger defects	Leakage behind the plunger
(b) (4)					

Subsequently, an AQL visual inspection was conducted by the quality unit on the remaining acceptable syringes and resulted in (b) (4) being rejected for a major defect which was categorized as a white particle.

Bevacizumab 2mg/0.08mL lot #138-20213103@12 was released.

2. Bevacizumab 1.25mg/0.05mL (25mg/mL) lot #138-20211901@19 was visually inspected from 02/02/21 - 02/03/2021 resulting in (b) (4) non-conforming units out of a total of (b) (4) resulting in a rejectable defect of (b) (4)%, which is a passing result, and was sent for AQL testing. The non-conforming units were classified as follows:

Black Particles	White Particles	Clear Particles	Plunger defects	Leakage behind the plunger
(b) (4)				

The AQL visual inspection was conducted by the quality unit on the remaining acceptable syringes on 02/03/2021 and failed. The AQL inspection resulted in (b) (4) total defects, (b) (4) of which were classified as critical and (b) (4) classified as major. The batch was sent back for another 100% visual inspection on the remaining acceptable units.

The 100% re-inspection of this batch was conducted on 02/04/2021 and resulted in (b) (4) non-conforming units out of a total of (b) (4) resulting in a rejectable defect of (b) (4)%, which is passing. The specification for a re-inspection is (b) (4) %. The non-conforming units were classified as follows:

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE		DATE ISSUED
	Darren S Brown, Investigator Jeffrey P Raimondi, Investigator	X Darren S Brown Investigator Signed By: 2001847760 Date Signed: 08-13-2021 14:39:09	8/13/2021

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
19701 Fairchild Irvine, CA 92612-2445 (949) 608-2900 Fax: (949) 608-4417	8/2/2021-8/13/2021* FEI NUMBER 3012890460

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED	
Christopher Dinoffria, Director of Compliance	
FIRM NAME Optum Compounding Services, LLC	STREET ADDRESS 24416 N 19th Ave
CITY, STATE, ZIP CODE, COUNTRY Phoenix, AZ 85085-1887	TYPE ESTABLISHMENT INSPECTED Outsourcing Facility

White Particles	Barrel defect	Plunger defect	Leakage behind plunger
(b) (4)			

A second AQL was performed on the remaining acceptable syringes from the batch and passed. Bevacizumab lot #138-20211901@19 was subsequently released.

B) A limit or specification of typical rejection rates during 100% visual inspection of filled syringes has not been established. For example, there are no limits established for categories of defects, such as critical, major, and minor, or specific types of defects, such as particles. The defect specification is set for the total number of rejected syringes per batch with a limit of (b) (4)% for an initial inspection, and < (b) (4)% for a re-inspection.

C) Release testing for syringes is not adequate to identify defective syringes containing white particles. For example, syringes are released to production after an AQL sample size of the lot is visually inspected. Although no white particles were observed during the release AQL of the 1mL (b) (4) Syringe lot (b) (4) these syringes were used in Bevacizumab 2mg/0.08mL lot #138-20213103@12 and approximately (b) (4) units were rejected due to white particles. The white particles have been identified as a particle that is intrinsic to the manufacturing of the syringe.

OBSERVATION 2

There is a failure to thoroughly review any unexplained discrepancy whether or not the batch has been already distributed.

Specifically,

A) QRE 27255 was opened to investigation an adverse event associated with Bevacizumab lot #138-20191212@3. The investigation is inadequate in that the retain samples were not retested for parameters such as, but not limited to, sub visible particles.

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE		DATE ISSUED
	Darren S Brown, Investigator Jeffrey P Raimondi, Investigator	X Darren S Brown Investigator Signed By: 2001847760 Date Signed: 08-13-2021 14:39:09	8/13/2021

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
19701 Fairchild Irvine, CA 92612-2445 (949) 608-2900 Fax: (949) 608-4417	8/2/2021-8/13/2021* FEI NUMBER 3012890460

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Christopher Dinoffria, Director of Compliance

FIRM NAME	STREET ADDRESS
Optum Compounding Services, LLC	24416 N 19th Ave
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED
Phoenix, AZ 85085-1887	Outsourcing Facility

B) Investigation into QRE #25723, dated 12/16/2019, was initiated due to a customer complaint regarding a fiber that was found in a syringe of Bevacizumab (b) (4) 1.25mg/0.05mL lot #138-20192110@17. The investigation was inadequate in that it did not identify what the fiber was.

C) Although the majority of particles identified in filled syringes during visual inspection have been attributed to the lubricant (b) (4) a CAPA has not been implemented to adequately reduce or eliminate the presence of particles in finished product.

OBSERVATION 3

Drug product containers or closures are additive so as to alter the safety, identity, strength, quality, and purity of the drug beyond the official or established requirements.

Specifically, the (b) (4) lubricant used in (b) (4) Normject syringes was identified as a cause of white particles seen in finished product bevacizumab, which are rejected when observed. Additionally, the supplier of these syringes has not been re-audited or re-surveyed when these quality related issues were identified, as mentioned by procedure: OCS-SOP-011, Qualification of Vendors, Effective Date: 11/17/2020, Version 1.

*DATES OF INSPECTION

8/02/2021(Mon), 8/03/2021(Tue), 8/04/2021(Wed), 8/05/2021(Thu), 8/06/2021(Fri), 8/09/2021(Mon), 8/10/2021(Tue), 8/11/2021(Wed), 8/12/2021(Thu), 8/13/2021(Fri)

X Jeffrey P Raimondi
Investigator
Signed By: Jeffrey P. Raimondi -S
Date Signed: 08-13-2021 14:39:57

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE	DATE ISSUED
	Darren S Brown, Investigator Jeffrey P Raimondi, Investigator X Darren S Brown Investigator Signed By: 2001847760 Date Signed: 08-13-2021 14:39:09	8/13/2021

The observations of objectionable conditions and practices listed on the front of this form are reported:

1. Pursuant to Section 704(b) of the Federal Food, Drug and Cosmetic Act, or
2. To assist firms inspected in complying with the Acts and regulations enforced by the Food and Drug Administration.

Section 704(b) of the Federal Food, Drug, and Cosmetic Act (21 USC 374(b)) provides:

"Upon completion of any such inspection of a factory, warehouse, consulting laboratory, or other establishment, and prior to leaving the premises, the officer or employee making the inspection shall give to the owner, operator, or agent in charge a report in writing setting forth any conditions or practices observed by him which, in his judgment, indicate that any food, drug, device, or cosmetic in such establishment (1) consists in whole or in part of any filthy, putrid, or decomposed substance, or (2) has been prepared, packed, or held under insanitary conditions whereby it may have become contaminated with filth, or whereby it may have been rendered injurious to health. A copy of such report shall be sent promptly to the Secretary."