

## Biological Product Deviation Reporting and HCT/P Deviation Reporting - Deviation Codes

[Blood BPD Codes](#) | [Licensed Non-Blood BPD Codes](#) | [HCT/P Deviation Codes](#)

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### Blood BPD Codes:

Use the following list of Biological Product Deviation (BPD) Codes to assign a specific code to a reportable event when you submit the report to FDA. Use the guidance document, "[Biological Product Deviation Reporting for Blood and Plasma Establishments](#)," to determine if you must report an event. The list includes deviations from regulations, standards, and established specifications that may affect the safety, purity, or potency of a product. The use of BPD Codes will assist the FDA in analyzing the data submitted and streamline the trend analysis.

Use one of the following BPD Codes to report an event that was recognized by a staff member who determined, *prior to distribution*, that the event has the potential to affect the safety, purity, or potency of the distributed product and that the product was either not quarantined or inappropriately released from quarantine.

QC-94-\*\* Distribution of product that did not meet specifications

QC-94-12 Product identified as unsuitable due to a collection deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product}*

QC-94-13 Product identified as unsuitable due to a component preparation deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product}*

QC-94-14 Product identified as unsuitable due to a labeling deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product}*

QC-94-15 Product identified as unsuitable due to a donor screening deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product}*

QC-94-16 Product identified as unsuitable due to a donor deferral deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product}*

QC-94-17 Product identified as unsuitable due to a shipping or storage deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product}*

QC-94-18 Product identified as unsuitable due to a transfusion-transmitted infection testing deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product}*

If you are a transfusion service only, the deviation codes you should select from are Component Preparation (CP), Routine Testing (RT), Labeling (LA), Quality Control and Distribution (QC).

### 1. Revisions to Blood BPD Reporting Codes for FY2025

For FY2025, we modified codes to clarify specific events that are reportable.

### 2. Summary of FY2025 Revisions

An overview of the changes that were made to the BPD codes for FY2025 is provided below. Refer to each section below for the complete list of BPD codes.

#### A. The following code has been added:

- LA-81-\*\* Labeling; Labels applied to blood unit incorrect or missing information
  - LA-81-19 Pathogen reduction status incorrect or missing

#### B. The following code has been modified:

LA82 - Crossmatch tag, tie tag or transfusion record incorrect or missing **applicable** information

**C. The information within the parenthesis for the following BPD code has been modified to clarify reportable events:**

QC-94-08 Product distributed prior to resolution of discrepancy *{conflicting information that requires investigation which is not resolved prior to distribution, e.g., discrepant test results, ABO discrepancy, Whole Blood Number discrepancy; **product issued prior to completion of transfusion reaction work-up**; do not use QC9408 if more specific code applies, such as QC9412 through QC9418}*

### 3. Blood BPD Reporting Codes

Please use the appropriate code(s) from the listing below to report a deviation or unexpected event that occurred in a blood or plasma establishment.

Changes made on October 1, 2024 (the beginning of FY2025) are identified with a dagger (†).

The following list is a summary of abbreviations used to identify each category of Blood BPD codes:

Donor Eligibility

DS - Donor Screening

DD - Donor Deferral

BC - Blood Collection

CP - Component Preparation

Laboratory Testing

VT - Transfusion-Transmitted Infection Testing

RT - Routine Testing

LA - Labeling

QC - Quality Control and Distribution

#### **DS/DD DONOR ELIGIBILITY**

#### **DS-\*\*-\*\* DONOR SCREENING**

DS-20-\*\*-\*\* Miscellaneous

DS-20-01 Other

DS-21-\*\*-\*\* Donor did not meet eligibility criteria

DS-21-01 Other

DS-21-02 Hemoglobin or Hematocrit unacceptable, not documented, or testing performed incorrectly *{includes use of expired reagents for hemoglobin or hematocrit}*

DS-21-03 Temperature unacceptable or not documented

DS-21-04 Medical history interview or physical assessment not performed or inadequate

DS-21-05 Platelet count, no documented platelet count for product

DS-22-\*\*-\*\* Donor record incomplete or incorrect

DS-22-01 Other *{includes missing donor records}*

DS-22-02 Donor identification *{includes donor using false identification, e.g., twins}*

DS-22-03 Donor history questions *{includes response to educational material/AIDS questions not documented; incorrect gender specific question asked; donor comprehension questionable}*

DS-22-04 Arm inspection

DS-26-\*\* Deferral screening not done or incorrectly performed, including incorrect ID used during search  
DS-26-01 Donor not previously deferred *{use DS2601 when the deferral file is not searched or searched using incorrect donor identification information, or the deferral file was incorrectly searched, and the donor was not previously deferred}*

DS-27-\*\* Deferral screening not done or incorrectly performed, including incorrect ID used during search, prior deferral due to testing for: *{use DS27\*\* when the deferral file is not searched or searched using incorrect donor identification information, or the deferral file was incorrectly searched, and the donor was previously deferred due to testing}*

DS-27-01 Other  
DS-27-02 HIV  
DS-27-03 HBV  
DS-27-04 Anti-HBc  
DS-27-05 HCV  
DS-27-06 Anti-HTLV  
DS-27-08 Syphilis  
DS-27-10 West Nile Virus  
DS-27-11 T. Cruzi (Chagas)  
DS-27-12 Babesia

DS-28-\*\* Deferral screening not done or incorrectly performed, including incorrect ID used during search, prior deferral due to history *{use DS28\*\* when the deferral file is not searched or searched using incorrect donor identification information, or the deferral file was incorrectly searched, and the donor was previously deferred due to history}*

DS-28-01 Other *{includes type of behavior or history unknown or not specified; unacceptable address; donor unreliable, for example mental status questionable}*  
DS-28-02 History of hepatitis, not specified  
DS-28-03 History of jaundice  
DS-28-04 History of Hepatitis B  
DS-28-05 History of Hepatitis C  
DS-28-06 History of, or treatment for, syphilis or gonorrhea  
DS-28-07 Intimate contact with risk for a relevant transfusion-transmitted infection - syphilis  
DS-28-13 Non-specific intimate contact with risk for a relevant transfusion-transmitted infection *{includes contact with an individual who was deferred by another center, on a national deferral list, or tested reactive for an unknown viral marker}*  
DS-28-14 Male donor had sex with another man  
DS-28-15 Female had sex with a man who had sex with another man  
DS-28-16 History of non-prescription injection drug use  
DS-28-17 History of sex with a person with a history of non-prescription drug use  
DS-28-22 History of exchanging sex for money, drugs, or other payment  
DS-28-23 History of sex with a person with a history of exchanging sex for money, drugs, or other payment  
DS-28-28 History of receiving a transfusion of Whole Blood or blood components *{e.g., packed red blood cells, platelets, plasma}*  
DS-28-29 Donor received xenotransplantation product (specify product) *{does not include human tissue}*  
DS-28-36 Travel to or residence in a malaria endemic area/history of malaria  
DS-28-37 History of disease *{donor was aware of condition or disease prior to donation; does not include diseases that do not affect the safety, purity, or potency of the product e.g., heart disease, hemochromatosis, autoimmune disorders, such as Rheumatoid Arthritis, Lupus}*  
DS-28-40 Risk factors associated with Creutzfeldt-Jakob Disease - received human cadaveric (allogeneic) dura mater transplant  
DS-28-41 Risk factors associated with Creutzfeldt-Jakob Disease - family history (blood relative diagnosed with familial prion disease {e.g., fCJD, GSS, or FFI})

DS-28-44 Received cadaveric pituitary growth hormone  
 DS-28-45 Received finasteride, etretinate, isotretinoin, dutasteride (specify medication) {e.g., Proscar, Propecia, Tegison, Accutane, Avodart, Jalyn, or Absorica}  
 DS-28-46 Received antibiotics or medication which may adversely affect the product (specify medication) {e.g., platelet inhibitor drugs; drugs with teratogenic effect; medication to treat or prevent HIV infection; does not include anticoagulant therapy}  
 DS-28-47 Received vaccine or immune globulin  
 DS-28-48 Exposure to a disease  
 DS-28-49 Incarcerated  
 DS-28-53 Multiple high-risk behaviors/contacts  
 DS-28-55 Donor deferred by another center due to history or tested reactive, specific history or testing unknown {reason for deferral unknown or not provided by the other center – use more specific DS code if reason known}  
 DS-28-58 Risk factor associated with Chagas {includes tested reactive prior to donation}  
 DS-28-59 History of tattoo and/or piercing  
 DS-28-60 History of contact with blood of another individual through percutaneous inoculation such as needlestick, or contact with a donor's open wound or mucous membranes  
 DS-28-61 Intimate contact with risk for a relevant transfusion-transmitted infection - HIV  
 DS-28-62 Intimate contact with risk for a relevant transfusion-transmitted infection - HTLV  
 DS-28-63 Intimate contact with risk for a relevant transfusion-transmitted infection - HBV  
 DS-28-64 Intimate contact with risk for a relevant transfusion-transmitted infection - HCV  
 DS-28-65 Intimate contact with risk for a relevant transfusion-transmitted infection - hepatitis, not specified  
 DS-28-66 Intimate contact with risk for a relevant transfusion-transmitted infection – Other  
 DS-28-67 History of sex with a new partner and having anal sex  
 DS-28-68 History of sex with more than one partner and having anal sex

DS-29-\*\* Donor gave history which warranted deferral or follow up and was not deferred or follow up questions were not asked {use DS29\*\* when a donor gives disqualifying information during the screening process and was not appropriately deferred or provides some information that requires further questioning to determine donor eligibility and follow up questioning was not done}

DS-29-01 Other {includes type of behavior or history unknown or not specified; donor unreliable, for example mental status questionable; unacceptable address}  
 DS-29-02 History of hepatitis, not specified, or tested reactive prior to donation  
 DS-29-03 History of jaundice  
 DS-29-04 History of Hepatitis B, or tested reactive prior to donation  
 DS-29-05 History of Hepatitis C, or tested reactive prior to donation  
 DS-29-06 History of, or treatment for, syphilis or gonorrhea  
 DS-29-07 Intimate contact with risk for a relevant transfusion-transmitted infection - syphilis  
 DS-29-13 Non-specific intimate contact with risk for a relevant transfusion-transmitted infection {includes contact with an individual who was deferred by another center, on a national deferral list, or tested reactive for an unknown viral marker}  
 DS-29-14 Male donor had sex with another man  
 DS-29-15 Female had sex with a man who had sex with another man  
 DS-29-16 History of non-prescription injection drug use  
 DS-29-17 History of sex with a person with a history of non-prescription drug use  
 DS-29-22 History of exchanging sex for money, drugs, or other payment  
 DS-29-23 History of sex with a person with a history of exchanging sex for money, drugs, or other payment  
 DS-29-28 History of receiving a transfusion of Whole Blood or blood components {e.g., packed red blood cells, platelets, plasma}  
 DS-29-29 Donor received xenotransplantation product (specify product) {does not include human tissue products}  
 DS-29-36 Travel to or resided in a malaria endemic area/history of malaria

DS-29-37 History of disease *{donor was aware of condition or disease **prior** to donation; does not include diseases that do not affect the safety, purity, or potency of the product e.g., heart disease, hemochromatosis, autoimmune disorders, such as Rheumatoid Arthritis, Lupus}*

DS-29-40 Risk factors associated with Creutzfeldt-Jakob Disease - received human cadaveric (allogeneic) dura mater transplant

DS-29-41 Risk factors associated with Creutzfeldt-Jakob Disease - family history (blood relative diagnosed with familial prion disease {e.g., fCJD, GSS, or FFI})

DS-29-44 Received cadaveric pituitary growth hormone

DS-29-45 Received finasteride, etretinate, isotretinoin, dutasteride (specify medication) {e.g., Proscar, Propecia, Tegison, Accutane, Avodart, Jalyn, or Absorica}

DS-29-46 Received antibiotics or medication which may adversely affect the product (specify medication) {e.g., platelet inhibitor drugs; drugs with teratogenic effect; medication to treat or prevent HIV infection; does not include anticoagulant therapy}

DS-29-47 Received vaccine or immune globulin

DS-29-48 Exposure to a disease

DS-29-49 Incarcerated

DS-29-53 Multiple high-risk behaviors/contacts

DS-29-55 Donor deferred by another center due to history or tested reactive, specific history or testing unknown *{reason for deferral unknown or not provided by the other center – use more specific DS code if reason known}*

DS-29-58 Risk factor associated with Chagas *{includes tested reactive prior to donation}*

DS-29-59 History of tattoo and/or piercing

DS-29-60 History of contact with blood of another individual through percutaneous inoculation such as needlestick, or through contact with a donor's open wound or mucous membranes

DS-29-61 Intimate contact with risk for a relevant transfusion-transmitted infection - HIV

DS-29-62 Intimate contact with risk for a relevant transfusion-transmitted infection – HTLV

DS-29-63 Intimate contact with risk for a relevant transfusion-transmitted infection - HBV

DS-29-64 Intimate contact with risk for a relevant transfusion-transmitted infection - HCV

DS-29-65 Intimate contact with risk for a relevant transfusion-transmitted infection - hepatitis, not specified

DS-29-66 Intimate contact with risk for a relevant transfusion-transmitted infection – Other

DS-29-67 History of sex with a new partner and having anal sex

DS-29-68 History of sex with more than one partner and having anal sex

#### **DD-\*\*-\*\* DONOR DEFERRAL**

DD-30-\*\*-\*\* Miscellaneous  
 DD-30-01 Other

DD-31-\*\*-\*\* Donor missing, incorrectly deleted, or incorrectly identified on deferral list, donor was or should have been previously deferred due to testing for *{use DD31\*\* if the donor should have been deferred due to testing at a previous donation and was either not on the deferral list or incorrectly identified on the deferral list, e.g. listed as temporary deferral instead of permanent deferral; also, includes if the donor was not reentered appropriately}*

DD-31-01 Other  
 DD-31-02 HIV  
 DD-31-03 HBV  
 DD-31-04 Anti-HBc  
 DD-31-05 HCV  
 DD-31-06 Anti-HTLV  
 DD-31-08 Syphilis  
 DD-31-10 West Nile Virus  
 DD-31-11 T. Cruzi (Chagas)  
 DD-31-12 Babesia

DD-32-\*\*-\*\* Donor missing, incorrectly deleted, or incorrectly identified on deferral list, donor was or should have been previously deferred due to history *{use DD32\*\* if the donor should have been deferred due to*

*history at a previous donation and was either not on the deferral list or incorrectly identified on the deferral list, e.g., listed as temporary deferral instead of permanent deferral; also, includes if the donor was not reentered appropriately}*

DD-32-01 Other *{includes type of behavior or history unknown or not specified; unacceptable address; donor unreliable, for example mental status questionable}*

DD-32-02 History of hepatitis, not specified

DD-32-03 History of jaundice

DD-32-04 History of Hepatitis B

DD-32-05 History of Hepatitis C

DD-32-06 History of, or treatment for, syphilis or gonorrhea

DD-32-07 Intimate contact with risk for a relevant transfusion-transmitted infection - syphilis

DD-32-13 Non-specific intimate contact with risk for a relevant transfusion-transmitted infection *{includes contact with an individual who was deferred by another center, on a national deferral list, or tested reactive for an unknown viral marker}*

DD-32-14 Male donor had sex with another man

DD-32-15 Female had sex with a man who had sex with another man

DD-32-16 History of non-prescription injection drug use

DD-32-17 History of sex with a person with a history of non-prescription drug use

DD-32-22 History of exchanging sex for money, drugs, or other payment

DD-32-23 History of sex with a person with a history of exchanging sex for money, drugs, or other payment

DD-32-28 History of receiving a transfusion of Whole Blood or blood components *{e.g., packed red blood cells, platelets, plasma}*

DD-32-29 Donor received xenotransplantation product (specify product) *{does not include human tissue products}*

DD-32-36 Travel to or residence in a malaria endemic area/history of malaria

DD-32-37 History of disease *{donor was aware of condition or disease prior to donation; does not include diseases that do not affect the safety, purity, or potency of the product e.g., heart disease, hemochromatosis, autoimmune disorders, such as Rheumatoid Arthritis, Lupus}*

DD-32-40 Risk factors associated with Creutzfeldt-Jakob Disease - received human cadaveric (allogeneic) dura mater transplant

DD-32-41 Risk factors associated with Creutzfeldt-Jakob Disease - family history (blood relative diagnosed with familial prion disease {e.g., fCJD, GSS, or FFI})

DD-32-44 Received cadaveric pituitary growth hormone

DD-32-45 Received finasteride, etretinate, isotretinoin, dutasteride (specify medication) *{e.g., Proscar, Propecia, Tegison, Accutane, Avodart, Jalyn, or Absorica}*

DD-32-46 Received antibiotics or medication which may adversely affect the product (specify medication) *{e.g., platelet inhibitor drugs; drugs with teratogenic effect; medication to treat or prevent HIV infection; does not include anticoagulant therapy}*

DD-32-47 Received vaccine or immune globulin

DD-32-48 Exposure to a disease

DD-32-49 Incarcerated

DD-32-53 Multiple high-risk behaviors/contacts

DD-32-55 Donor deferred by another center due to history or tested reactive, specific history or testing unknown *{reason for deferral unknown or not provided by the other center – use more specific DD code if reason known}*

DD-32-58 Risk factor associated with Chagas *{includes tested reactive prior to donation}*

DD-32-59 History of tattoo and/or piercing

DD-32-60 History of contact with blood of another individual such as needlestick, or through contact with a donor's open wound or mucous membranes

DD-32-61 Intimate contact with risk for a relevant transfusion-transmitted infection - HIV

DD-32-62 Intimate contact with risk for a relevant transfusion-transmitted infection - HTLV

DD-32-63 Intimate contact with risk for a relevant transfusion-transmitted infection - HBV

DD-32-64 Intimate contact with risk for a relevant transfusion-transmitted infection - HCV

DD-32-65 Intimate contact with risk for a relevant transfusion-transmitted infection - hepatitis, not specified

- DD-32-66 Intimate contact with risk for a relevant transfusion-transmitted infection – Other
- DD-32-67 History of sex with a new partner and having anal sex
- DD-32-68 History of sex with more than one partner and having anal sex

**BC-\*\*-\*\* BLOOD COLLECTION**

BC-40-\*\*-\*\* Miscellaneous

BC-40-01 Other

BC-41-\*\*-\*\* Sterility compromised

BC-41-01 Other

BC-41-02 Bacterial contamination (identify organism if possible) *{use BC4102 if contamination is discovered as a result of a patient transfusion reaction; if contamination was found during Bacterial Detection Testing, use QC9216}*

BC-41-03 Air contamination *{includes system open during collection process, e.g., during sample collection}*

BC-41-04 Arm prep not performed or performed inappropriately *{includes the use of incorrect arm preparation supplies; supplies not maintained appropriately, e.g., stored at unacceptable temperature}*

BC-42-\*\*-\*\* Collection bag

BC-42-01 Other

BC-42-02 Blood drawn into outdated bag

BC-42-03 Incorrect anticoagulant

BC-42-04 Outdated anticoagulant

BC-42-05 Potential collection set (bag, tubing) defect (e.g., product leaking) *{use BC4205 if event not related to component preparation}*

BC-42-06 Incorrect collection bag used (e.g., 500 ml bag instead of 450ml bag)

BC-43-\*\*-\*\* Collection process

BC-43-01 Other *{includes use of incorrect collection supplies; use of supplies that were not maintained appropriately; product contained clots and was hemolyzed which was not discovered prior to distribution}*

BC-43-03 Overweight collection (anticoagulant ratio unacceptable); not discovered prior to component preparation

BC-43-05 Product contained clots or fibrin, not discovered prior to distribution *{includes clots discovered by consignee upon receipt of product or during transfusion}*

BC-43-06 Product hemolyzed, not discovered prior to distribution *{reporting is not required if hemolyzed product discovered after consignee accepted it into their inventory}*

BC-43-08 Donor sample tube mix-up or donor sample tube mislabeled

BC-43-09 Apheresis collection process

BC-44-\*\*-\*\* Apheresis collection device

BC-44-01 Other *{includes collection kits not used within acceptable time period (or not documented) after loading or priming}*

BC-44-02 Device defect

BC-44-03 Softgoods defect (bags, tubing, etc.)

**CP-\*\*-\*\* COMPONENT PREPARATION**

CP-50-\*\*-\*\* Miscellaneous

CP-50-01 Other

CP-51-\*\*-\*\* Sterility compromised

CP-51-01 Other

CP-51-03 Air contamination

CP-51-04 Product integrity compromised during component preparation (e.g., leaking at sterile connection site)

- CP-52-\*\* Component not prepared in accordance with specifications
  - CP-52-01 Other *{includes insufficient or excessive plasma volume}*
  - CP-52-02 Platelets made from Whole Blood collected from donor who took medication that may affect platelet function
  - CP-52-04 Platelets not agitated
  - CP-52-05 Platelet count or platelet yield not acceptable as a result of a component preparation deviation or unexpected event *{includes platelet count too high to store in one bag or platelet count too low to store in multiple bags}*
  - CP-52-06 Product processed at incorrect centrifuge setting
  - CP-52-07 Product not frozen within the appropriate time frame or freezing time not documented
  - CP-52-08 Product prepared at incorrect temperature or held at incorrect temperature during component preparation
  - CP-52-09 Washing/deglycerolization not performed in accordance with specifications *{includes expired saline or incorrect wash solution used}*
  - CP-52-10 Leukoreduction not performed in accordance with specifications *{includes time component returned to controlled temperature not documented or discrepant; product not leukoreduced within allowable time frame; filtration process incomplete or performed incorrectly}*
  - CP-52-11 Irradiation not performed in accordance with specifications *{includes time component returned to controlled temperature not documented or discrepant; documentation of irradiation process incomplete; product irradiated more than once; irradiation process incomplete or inadequate}*
  - CP-52-12 Components not prepared within appropriate time frame after collection
  - CP-52-13 Additive solution not added, added incorrectly, or added to incorrect product or expired additive solution added
  - CP-52-14 Thawing frozen product not performed in accordance with specifications
  - CP-52-15 Pooling not performed in accordance with specifications *{includes incorrect number of units pooled}*
  - CP-52-16 Aliquot preparation not performed in accordance with specifications
  - CP-52-17 Sterile docking procedure not performed in accordance with specifications *{includes incorrect, missing, or discrepant documentation of weld inspection}*
  - CP-52-18 Pathogen reduction not performed in accordance with specifications

- CP-53-\*\* Component prepared from a unit that was
  - CP-53-01 Other
  - CP-53-02 Overweight
  - CP-53-03 Underweight
  - CP-53-04 Stored at unacceptable or undocumented temperature

- CP-54-\*\* Component manufactured that was
  - CP-54-01 Other
  - CP-54-02 Overweight
  - CP-54-03 Underweight
  - CP-54-04 Lipemic
  - CP-54-05 Bloody

**VT/RT LABORATORY TESTING**

**VT-\*\*-\*\* TRANSFUSION-TRANSMITTED INFECTION TESTING**

- VT-70-\*\* Miscellaneous
  - VT-70-01 Other

- VT-71-\*\* Testing performed, interpreted or documented incorrectly; not performed; incompletely performed; or not documented for *{includes QC not performed or unacceptable, expired reagents used; use QC92\*\* if testing is positive}*
  - VT-71-00 Other
  - VT-71-01 HBV



- VT-71-02 HIV
- VT-71-06 Syphilis
- VT-71-07 HTLV
- VT-71-10 HCV
- VT-71-11 More than 1 test, e.g., all viral markers
- VT-71-12 Cytomegalovirus
- VT-71-15 Multiplex Nucleic Acid Test (NAT)
- VT-71-17 West Nile Virus
- VT-71-18 T. Cruzi (Chagas)
- VT-71-19 Bacterial testing
- VT-71-21 Babesia

VT-72-\*\* Sample identification

- VT-72-01 Other
- VT-72-02 Incorrect sample tested
- VT-72-03 Sample used for testing was incorrectly or incompletely labeled
- VT-72-04 Unsuitable sample used for testing

**RT-\*\*-\*\* ROUTINE TESTING**

RT-60-\*\* Miscellaneous

- RT-60-01 Other

RT-61-\*\* Testing performed, interpreted, or documented incorrectly; not performed; incompletely performed; or not documented for *{includes discrepancies in testing due to weak reactions; QC not performed, performed incorrectly, or unacceptable; expired reagents used; use QC92\*\* if testing positive; use QC9406 if reagents used on automated instrument were expired or QC was not performed or documented}*

- RT-61-01 Other
- RT-61-04 ABO and/or Rh *{includes failure to perform patient recheck/retyping}*
- RT-61-05 Antibody screening or identification
- RT-61-06 Antigen typing
- RT-61-07 Platelet count
- RT-61-08 Compatibility *{includes electronic or immediate spin crossmatch performed instead of full crossmatch, when required}*
- RT-61-09 ABO, Rh, and antibody screen
- RT-61-10 ABO, Rh, antibody screen, and compatibility
- RT-61-11 Antibody screen and compatibility
- RT-61-12 Antigen typing and compatibility
- RT-61-13 All routine testing

RT-62-\*\* Sample identification

- RT-62-01 Other
- RT-62-02 Incorrect sample tested
- RT-62-03 Sample used for testing was incorrectly or incompletely labeled
- RT-62-04 Unsuitable sample used for testing (e.g., too old)

**LA-\*\*-\*\* LABELING**

LA-80-\*\* Miscellaneous

- LA-80-01 Other

LA-81-\*\* Labels applied to blood unit incorrect or missing information

- LA-81-01 Other *{includes units collected from a paid donor labeled as collected from a volunteer donor}*
- LA-81-02 ABO and/or Rh incorrect or missing

LA-81-04 Product type or code incorrect or missing (e.g., RBC labeled as Whole Blood) *{reporting is not required if part or container identification was incorrect or missing; do not use LA8104 if there is a specific code available, e.g., use LA8113 if unit not labeled as leukoreduced}*  
 LA-81-06 Expiration date or time extended or missing  
 LA-81-08 Anticoagulant incorrect or missing (e.g., CPD vs ACD)  
 LA-81-09 Donor/unit number incorrect or missing  
 LA-81-10 Combination of incorrect or missing information *{e.g., unit number and expiration date}*  
 LA-81-11 Product volume incorrect or missing  
 LA-81-12 Irradiation status incorrect or missing  
 LA-81-13 Leukoreduction status incorrect or missing  
 LA-81-14 Irradiation and leukoreduction status incorrect or missing  
 LA-81-15 CMV status incorrect or missing  
 LA-81-16 Machine-readable bar code incorrect or missing *{Lot number, product code, or ABO and Rh of the donor}*  
 LA-81-17 Transfusion-transmitted infection testing status incorrect or missing *{e.g., HIV, HBV, HCV}*  
 LA-81-18 Anticoagulant volume on Whole Blood unit incorrect or missing  
 †LA-81-19 Pathogen reduction status incorrect or missing

†LA-82-\*\* Crossmatch tag, tie tag or transfusion record incorrect or missing applicable information *{Use LA-82 if tag physically attached to the unit is incorrect or missing information, the transfusion record, accompanied with unit, is incorrect or missing information, or both the tag and transfusion record are incorrect or missing applicable information}*

LA-82-01 Other *{includes required information that's not identified in any other deviation code}*  
 LA-82-02 Unit ABO and/or Rh incorrect or missing  
 LA-82-03 Recipient ABO and/or Rh incorrect or missing  
 LA-82-04 Product type or code incorrect or missing *{reporting is not required if part or container identification was incorrect or missing}*  
 LA-82-05 Expiration date or time extended or missing  
 LA-82-06 Unit or pool number incorrect or missing *{reporting is not required if tag/transfusion record was switched between two units intended for the same patient}*  
 LA-82-07 Recipient identification incorrect or missing  
 LA-82-08 Antigen incorrect or missing  
 LA-82-09 Antibody incorrect or missing  
 LA-82-10 Platelet count/yield incorrect or missing  
 LA-82-12 Product volume incorrect or missing  
 LA-82-13 CMV status incorrect or missing  
 LA-82-14 Irradiation status incorrect or missing  
 LA-82-15 Leukoreduced status incorrect or missing  
 LA-82-17 Compatibility information incorrect or missing  
 LA-82-19 Combination of incorrect or missing information *{e.g., unit number and expiration date}*  
 LA-82-20 Crossmatch tag, tie tag, or transfusion record missing or attached to incorrect unit *{e.g., intended for different patient; reporting is not required if tag/transfusion record was switched between two units intended for the same patient}*

## **QC-\*\*-\*\* QUALITY CONTROL AND DISTRIBUTION**

QC-90-\*\* Miscellaneous  
 QC-90-01 Other

QC-91-\*\* Failure to quarantine unit due to medical history *{includes failure to quarantine after receiving post donation information, use the code specific to the post donation information}*

QC-91-01 Other *{includes type of behavior or history unknown or not specified; unacceptable address; donor unreliable, for example mental status questionable}*  
 QC-91-02 History of hepatitis, not specified, or tested reactive prior to donation  
 QC-91-03 History of jaundice  
 QC-91-04 History of Hepatitis B, or tested reactive prior to donation

QC-91-05 History of Hepatitis C, or tested reactive prior to donation  
 QC-91-06 History of, or treatment for, syphilis, or gonorrhea  
 QC-91-07 Intimate contact with risk for a relevant transfusion-transmitted infection - syphilis  
 QC-91-13 Non-specific intimate contact with risk for a relevant transfusion-transmitted infection *{includes contact with an individual who was deferred by another center, on a national deferral list, or tested reactive for an unknown viral marker}*  
 QC-91-14 Male donor had sex with another man  
 QC-91-15 Female had sex with a man who had sex with another man  
 QC-91-16 History of non-prescription injection drug use  
 QC-91-17 History of sex with a person with a history of non-prescription drug use  
 QC-91-22 History of exchanging sex for money, drugs, or other payment  
 QC-91-23 History of sex with a person with a history of exchanging sex for money, drugs, or other payment  
 QC-91-28 History of receiving a transfusion of Whole Blood or blood components *{e.g., packed red blood cells, platelets, plasma}*  
 QC-91-29 Donor received xenotransplantation product (specify product) *{does not include human tissue products}*  
 QC-91-36 Travel to or residence in a malaria endemic area/history of malaria  
 QC-91-37 History of disease *{donor was aware of condition or disease prior to donation; does not include diseases that do not affect the safety, purity, or potency of the product e.g., heart disease, hemochromatosis, autoimmune disorders, such as Rheumatoid Arthritis, Lupus}*  
 QC-91-39 History of Creutzfeldt-Jakob Disease  
 QC-91-40 Risk factors associated with Creutzfeldt-Jakob Disease - received human cadaveric (allogeneic) dura mater transplant  
 QC-91-41 Risk factors associated with Creutzfeldt-Jakob Disease - family history (blood relative diagnosed with familial prion disease *{e.g., fCJD, GSS, or FFI}*)  
 QC-91-44 Received cadaveric pituitary growth hormone  
 QC-91-45 Received finasteride, etretinate, isotretinoin, dutasteride (specify medication) *{e.g., Proscar, Propecia, Tegison, Accutane, Avodart, Jalyn, or Absorica}*  
 QC-91-46 Received antibiotics or medication which may adversely affect the product (specify medication) *{e.g., platelet inhibitor drugs; drugs with teratogenic effect; medication to treat or prevent HIV infection; does not include anticoagulant therapy}*  
 QC-91-47 Received vaccine or immune globulin  
 QC-91-48 Exposure to a disease  
 QC-91-49 Incarcerated  
 QC-91-53 Multiple high-risk behaviors/contacts  
 QC-91-55 Donor deferred by another center due to history or tested reactive, specific history or testing unknown *{reason for deferral unknown or not provided by the other center – use more specific QC code if reason known}*  
 QC-91-56 Post donation illness  
 QC-91-59 Risk factor associated with Chagas *{includes tested reactive prior to donation}*  
 QC-91-60 History of tattoo and/or piercing  
 QC-91-61 History of contact with blood of another individual through percutaneous inoculation such as needlestick, or through contact with a donor's open wound or mucous membranes  
 QC-91-62 Intimate contact with risk for a relevant transfusion-transmitted infection - HIV  
 QC-91-63 Intimate contact with risk for a relevant transfusion-transmitted infection - HTLV  
 QC-91-64 Intimate contact with risk for a relevant transfusion-transmitted infection - HBV  
 QC-91-65 Intimate contact with risk for a relevant transfusion-transmitted infection - HCV  
 QC-91-66 Intimate contact with risk for a relevant transfusion-transmitted infection - hepatitis, not specified  
 QC-91-67 Intimate contact with risk for a relevant transfusion-transmitted infection – Other  
 QC-91-68 History of sex with a new partner and having anal sex  
 QC-91-69 History of sex with more than one partner and having anal sex

QC-92-\*\* Product identified as unsuitable due to positive testing, event discovered subsequent to distribution *{Use RT61\*\* or VT71\*\* if testing was performed incorrectly, not performed, incompletely}*

*performed, or not documented; use QC9418, for events involving RTTI, if discovered prior to distribution but failed to quarantine product}*

- QC-92-01 Other
- QC-92-02 HIV
- QC-92-03 HBV (HBsAg, HBV NAT)
- QC-92-04 Anti-HBc
- QC-92-05 HCV (Anti-HCV, HCV NAT)
- QC-92-06 Anti-HTLV
- QC-92-10 Antibody screen or identification (donor/unit or recipient)
- QC-92-11 Antigen screen
- QC-92-12 Syphilis
- QC-92-13 All viral markers
- QC-92-14 Compatibility
- QC-92-15 Multiplex Nucleic Acid Test (NAT)
- QC-92-16 Bacterial testing (identify organism if possible) *{reporting is not required if the gram stain is negative, and no organism was identified}*
- QC-92-18 West Nile Virus
- QC-92-19 T. Cruzi (Chagas)
- QC-92-20 Babesia

QC-94-\*\* Distribution of product that did not meet specifications

- QC-94-01 Other *{includes product distributed prior to required record review}*
- QC-94-02 Outdated product
- QC-94-04 Product QC unacceptable, not performed, not documented, or incomplete *{includes platelet count/yield; product hematocrit/hemoglobin; RBC recovery; absolute red cell volume or product volume; WBC count; pH; product QC not performed during validation of the apheresis process}*
- QC-94-05 Product in which specification, other than QC, was not met *{includes incorrect dose (e.g., single unit vs. pooled unit); age of product; appearance (foreign object or particle); distribution of low titer plasma}*
- QC-94-06 Product in which instrument QC, calibration, or validation was unacceptable, incomplete, not performed or not documented *{includes hemoglobin/hematocrit reagents; microhematocrit centrifuge; trip scale; collection device; incubator/heat block; waterbath; centrifuge; irradiator; hematology analyzer/cell counter; immunohematology instrument/analyzer; bacterial detection device}*
- †QC-94-08 Product distributed prior to resolution of discrepancy *{conflicting information that requires investigation which is not resolved prior to distribution, e.g., discrepant test results, ABO discrepancy, Whole Blood Number discrepancy; product issued prior to completion of transfusion reaction work-up; do not use QC9408 if more specific code applies, such as QC9412 through QC9418}*
- QC-94-09 Product associated with product that contained clots or hemolysis *{use QC9409 if in-house component is discovered to be clotted or hemolyzed and associated component has already been distributed; use QC9412 if in-house component is discovered to be clotted or hemolyzed and associated product was not quarantined; use BC4305 (clotted) or BC4306 (hemolyzed) if consignee discovers component is clotted or hemolyzed and associated components were also distributed}*
- QC-94-12 Product identified as unsuitable due to a collection deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product; includes potential air contamination, arm preparation/inspection not performed or documented incorrectly, unit or associated unit was clotted or hemolyzed}*
- QC-94-13 Product identified as unsuitable due to a component preparation deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product; includes leukoreduction or irradiation not performed in accordance with specifications; transport (from collection center) conditions unacceptable, not documented, or discrepant}*
- QC-94-14 Product identified as unsuitable due to a labeling deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product}*

QC-94-15 Product identified as unsuitable due to a donor screening deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product; includes donor history question not answered or incomplete}*  
QC-94-16 Product identified as unsuitable due to a donor deferral deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product}*  
QC-94-17 Product identified as unsuitable due to a shipping or storage deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product; includes temperature excursions}*  
QC-94-18 Product identified as unsuitable due to a transfusion-transmitted infection testing deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product; includes products released with positive or incomplete testing, e.g., HBV, HCV, HIV, bacterial testing}*

QC-96-\*\* Shipping and storage

QC-96-01 Other  
QC-96-03 Product stored at incorrect temperature  
QC-96-04 No documentation that product was stored at appropriate temperature  
QC-96-07 Product shipped at incorrect temperature *{includes shipment with incorrect or missing coolant, e.g., no ice in RBC shipment; number of units did not meet validated container}*  
QC-96-08 Product was reissued without a record of proper temperature maintenance *{includes no record of inspection upon return}*  
QC-96-09 Visual inspection not performed or documented by blood center prior to distribution

QC-97-\*\* Distribution procedure not performed in accordance with blood bank transfusion service's specifications

QC-97-01 Other  
QC-97-02 Product not irradiated as required  
QC-97-03 Product issued to wrong patient  
QC-97-04 Improper product selected for patient *{e.g., FFP issued instead of RBC; use more specific codes, such as RT6106 if specific antigen typing is not performed; use QC9405 if incorrect dose (e.g., single unit vs. pooled unit) or incorrect age of product (e.g., not fresh) is issued}*  
QC-97-05 Improper ABO or Rh type selected for patient  
QC-97-06 Product not leukoreduced as required  
QC-97-07 Product released prior to obtaining current sample for ABO, Rh, antibody screen and/or compatibility testing *{includes original sample was expired, patient left facility and new sample was required; antibody screen/crossmatch expired}*  
QC-97-08 Product not CMV negative as required  
QC-97-10 Filter not issued with product or incorrect filter issued  
QC-97-11 Product not irradiated and leukoreduced as required  
QC-97-12 Product not irradiated and CMV negative as required  
QC-97-13 Procedure for issuing not performed or documented in accordance with specifications; use QC9719 if the visual inspection was not performed *{includes request slip labeled with incorrect or missing patient identification; emergency release procedure not followed}*  
QC-97-16 Product inspected and accepted upon receipt from blood center, subsequently discovered to be hemolyzed  
QC-97-17 Product not washed as required  
QC-97-18 Product returned and reissued inappropriately  
QC-97-19 Visual inspection not performed, not documented, or inadequate, includes product not documented or incorrectly documented as issued in the computer (computer documentation is final check of issue process)  
QC-97-20 Product not volume reduced as required  
QC-97-21 Product not hemoglobin S negative or Sickle Cell protocol not met as required *{includes testing positive, not performed, performed incorrectly, QC not performed or unacceptable; product labeled incorrectly}*

QC-97-22 Product not HLA matched as required *{includes testing positive, not performed, performed incorrectly, product labeled incorrectly}*

QC-98-\*\* Distribution of unit collected from a donor implicated in relevant transfusion-transmitted disease

- QC-98-01 Other
- QC-98-02 HIV
- QC-98-03 Hepatitis (specify type, if known)
- QC-98-04 West Nile Virus
- QC-98-05 Babesia
- QC-98-06 Chagas
- QC-98-07 Malaria

QC-99-\*\* Distribution of a unit collected from a donor who subsequently tested confirmed positive for a relevant transfusion transmitted disease *{use QC-99-\*\* when confirmatory or additional supplemental testing is positive; if confirmatory or additional supplemental testing is not positive, a report is not required}*

- QC-99-01 Other *{multiple markers}*
- QC-99-02 HIV
- QC-99-03 HBV
- QC-99-04 HCV
- QC-99-05 West Nile Virus
- QC-99-06 HTLV
- QC-99-07 Babesia
- QC-99-08 Chagas

??-??-?? DO NOT KNOW

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### Licensed Non-Blood BPD Codes:

Use the following list of Biological Product Deviation (BPD) Codes to assign a specific code to a reportable event when you submit the report to FDA. Use the guidance document, ["Biological Product Deviation Reporting for Manufacturers of Biological Products Other than Blood and Blood Components,"](#) to determine if you must report an event. The list includes deviations from regulations, standards, and license application specifications that may affect the safety, purity, or potency of a product. These codes may not apply to all establishments. The use of BPD Codes will assist the FDA in analyzing the data submitted and streamline the trend analysis.

### Licensed Non-Blood BPD Reporting Codes

Please use the appropriate code(s) from the listing below to report a deviation or unexpected event that occurred in a licensed non-blood establishment. No changes to the Non-Blood deviation codes were made for FY2025.

**The following list is a summary of abbreviations used to identify each category of Licensed Non-Blood BPD codes:**

- IM - Incoming Material Specifications
- PC - Process Controls
- TE - Testing
- LA - Labeling
- PS - Product Specifications
- QC - Quality Control and Distribution

**IM-\*\*-\*\* INCOMING MATERIAL SPECIFICATIONS**

IM-10-\*\*-\*\* Miscellaneous  
IM-10-01 Other

IM-14-\*\*-\*\* Source or raw material does not meet specifications or otherwise found to be unsuitable  
IM-14-01 Other *{includes source material collected from donor who was at risk for vCJD/CJD or tested positive for a RTTI}*  
IM-14-02 Contains precipitate/particle  
IM-14-03 Contaminated with microorganism  
IM-14-04 Contaminated with mold  
IM-14-05 Impurities exceed specification  
IM-14-06 Testing deviation  
IM-14-07 Stored or shipped at incorrect temperature or lack of controlled temperature

IM-15-\*\*-\*\* Incoming container, closure or device constituent part did not meet specifications or discovered defective *{includes vial, syringe, stopper, metal seal closure, syringe tip cap, delivery system}*

IM-15-01 Other  
IM-15-02 Vial/container  
IM-15-03 Syringe  
IM-15-04 Container closer (e.g., stopper)  
IM-15-05 Syringe tip cap  
IM-15-06 Delivery system (autoinjector, insulin infusion pump)

**PC-\*\*-\*\* PROCESS CONTROLS**

PC-20-\*\*-\*\* Miscellaneous  
PC-20-01 Other

PC-21-\*\*-\*\* Manufacturing or processing performed using incorrect parameters  
PC-21-01 Other  
PC-21-02 Incorrect temperature  
PC-21-03 Filling not performed according to procedures  
PC-21-04 Aseptic processing not performed according to procedures

PC-22-\*\*-\*\* Process/Procedure  
PC-22-01 Other  
PC-22-02 Interruption of process  
PC-22-03 Environmental monitoring excursions; environmental monitoring not performed or performed incorrectly  
PC-22-04 Equipment not performing properly  
PC-22-05 Sanitization, cleaning or maintenance of equipment not performed or performed incorrectly  
PC-22-06 Media fill failure or media fill performed incorrectly  
PC-22-07 In-process testing/controls not performed, performed incorrectly, or inadequate

PC-23-\*\*-\*\* Process Water - specification not met  
PC-23-01 Other  
PC-23-02 Water for injection  
PC-23-03 Purified water

PC-24-\*\*-\*\* Bulk or intermediate material does not meet specifications or otherwise found to be unsuitable  
PC-24-01 Other  
PC-24-02 Contains precipitate/particle  
PC-24-03 Contaminated with microorganism  
PC-24-04 Contaminated with mold  
PC-24-05 Impurities exceed specification

PC-24-06 Stored at incorrect temperature  
PC-24-07 Stored for an excessive hold time

**TE-\*\*-\*\* TESTING**

TE-30-\*\* Miscellaneous  
TE-30-01 Other

TE-31-\*\* Safety  
TE-31-01 Performed incorrectly  
TE-31-02 Not performed or not documented

TE-32-\*\* Purity  
TE-32-01 Performed incorrectly  
TE-32-02 Not performed or not documented

TE-33-\*\* Potency  
TE-33-01 Performed incorrectly  
TE-33-02 Not performed or not documented

TE-34-\*\* Sterility  
TE-34-01 Performed incorrectly  
TE-34-02 Not performed or not documented

TE-35-\*\* Identity  
TE-35-01 Performed incorrectly  
TE-35-02 Not performed or not documented

TE-36-\*\* Stability  
TE-36-01 Performed incorrectly  
TE-36-02 Not performed or not documented

**LA-\*\*-\*\* LABELING**

LA-40-\*\* Miscellaneous  
LA-40-01 Other

LA-41-\*\* Package insert  
LA-41-01 Incorrect/illegible  
LA-41-02 Missing  
LA-41-03 Not current or approved

LA-42-\*\* Product label  
LA-42-01 Incorrect/illegible  
LA-42-02 Missing

LA-43-\*\* Carton label  
LA-43-01 Incorrect/illegible  
LA-43-02 Missing

LA-44-\*\* Expiration date  
LA-44-01 Extended/illegible  
LA-44-02 Missing

LA-45-\*\* Lot number  
LA-45-01 Incorrect/illegible  
LA-45-02 Missing



LA-46-\*\* Storage temperature  
LA-46-01 Incorrect/illegible  
LA-46-02 Missing

LA-47-\*\* Administration route  
LA-47-01 Incorrect/illegible  
LA-47-02 Missing

LA-48-\*\* Concentration or volume  
LA-48-01 Incorrect/illegible  
LA-48-02 Missing

LA-49-\*\* Multiple information {e.g., lot number and expiration date}  
LA-49-01 Incorrect/illegible  
LA-49-02 Missing

**PS-\*\*-\*\* PRODUCT SPECIFICATIONS**

PS-50-\*\* Miscellaneous  
PS-50-01 Other

PS-51-\*\* Product specification not met  
PS-51-01 Other  
PS-51-02 Contains precipitate  
PS-51-03 Contaminated with microorganism  
PS-51-04 Contaminated with mold  
PS-51-05 Impurity levels  
PS-51-06 Moisture  
PS-51-07 Preservative content  
PS-51-08 Potency  
PS-51-09 Appearance {includes cloudy; hemolyzed; foreign object/particle, color}  
PS-51-10 Fill volume  
PS-51-12 Unexpected positive, negative, or weak reactions in testing

PS-52-\*\* Component packaged with final product did not meet specifications  
PS-52-01 Other  
PS-52-02 Contains precipitate/particle  
PS-52-03 Contaminated with microorganism  
PS-52-04 Contaminated with mold  
PS-52-05 Fill volume  
PS-52-06 Broken/cracked vial

PS-53-\*\* Stability testing failed  
PS-53-01 Other  
PS-53-02 Potency  
PS-53-03 Preservative  
PS-53-04 Container closure integrity  
PS-53-05 Chemical analysis/purity  
PS-53-06 Moisture  
PS-53-07 pH  
PS-53-08 Appearance

PS-54-\*\* Administration set, or device constituent part (packaged with product) did not meet specifications  
PS-54-01 Other  
PS-54-02 Incorrect or missing label  
PS-54-04 Expired

## **QC-\*\*-\*\* QUALITY CONTROL AND DISTRIBUTION**

QC-60-\*\*-\*\* Miscellaneous

QC-60-01 Other

QC-61-\*\*-\*\* Product distributed inappropriately

QC-61-01 Other

QC-61-02 Product distributed prior to completion of required testing

QC-61-03 Product distributed prior to CBER approval of a PAS

QC-61-04 Product distributed less than 30 days after submission of CBE-30 or prior to submission of CBE-30

QC-61-05 Product distributed prior to validation of process

QC-61-06 Outdated product distributed

QC-61-07 Product distributed prior to record review or release by the quality control unit

QC-62-\*\*-\*\* Shipping and storage

QC-62-01 Other

QC-62-02 Product shipped at incorrect temperature

QC-62-03 Product stored at incorrect temperature

QC-62-04 No documentation product was shipped or stored at appropriate temperature

QC-63-\*\*-\*\* Product identified as unacceptable, and not quarantined

QC-63-01 Other

QC-64-\*\*-\*\* Packing

QC-64-01 Other

QC-64-02 Vial missing

QC-64-03 Packaged incorrectly

QC-64-04 Broken or cracked vial/syringe/container/device constituent part

QC-64-05 Improper orientation (e.g., sideways)

??-??-?? DO NOT KNOW

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### **HCT/P Deviation Codes:**

Use the following list of Human Cells, Tissues and Cellular and Tissue-based Products (HCT/P) Deviation Codes to assign a specific code to a reportable event when you submit the report to FDA. Use the guidance document, [“Deviation Reporting for Human Cells, Tissues, and Cellular and Tissue-Based Products Regulated Solely Under Section 361 of the Public Health Service Act and 21 CFR Part 1271”](#) to determine if you must report an event. The list includes numerous codes for HCT/P deviations [see 21 CFR 1271.3(dd)] that may occur. However, an event is only required to be reported, if it relates to core Current Good Tissue Practices (CGTP) [see 21 CFR 1271.150(b)], involves a distributed HCT/P, and occurs in your facility or a facility that performs a manufacturing step for you under contract, agreement, or other arrangement [see 21 CFR 1271.350(b)(2)]. The use of the HCT/P Deviation Codes will assist the FDA in analyzing the data submitted and streamline the trend analysis.

### **HCT/P Deviation Reporting Codes**

Please use the appropriate code(s) from the listing below to report an HCT/P deviation. No changes to the HCT/P Deviation Codes were made for FY2025.

**The following list is a summary of abbreviations used to identify each category of HCT/P Deviation Codes based on applicable core CGTP:**

DE - Donor Eligibility  
DS - Donor Screening  
DT - Donor Testing  
FA - Facilities  
EC - Environmental Control  
EQ - Equipment  
SR - Supplies and Reagents  
RE - Recovery  
PC - Processing and Process Controls  
LC - Labeling Controls  
ST - Storage  
SD - Receipt, Pre-Distribution, Shipment, and Distribution

**DE-\*\*-\*\* DONOR ELIGIBILITY (21 CFR 1271.50)**

DE-02-\*\*-\*\* Ineligible donor accepted [except as provided in §1271.65(b)]  
DE-02-01 Risk factors for, or clinical evidence of infection due to relevant communicable disease agents and diseases according to §1271.75(a)(1)  
DE-02-02 Xenotransplant recipient accepted as donor  
DE-02-04 Donor tested reactive for relevant communicable disease

DE-03-\*\*-\*\* Donor eligibility determination  
DE-03-01 Not determined by a responsible person, as defined in §1271.3(t)

DE-99-\*\*-\*\* Miscellaneous  
DE-99-01 Other

**DS-\*\*-\*\* DONOR SCREENING (21 CFR 1271.75)**

DS-02-\*\*-\*\* Donor screening not performed [except as provided in §1271.60(d)] or performed incorrectly in the:  
DS-02-01 Donor medical history interview  
DS-02-02 Physical assessment of a cadaveric donor or physical examination of a living donor  
DS-02-03 Medical record review  
DS-02-04 Evaluation of communicable disease risks associated with xenotransplant  
DS-02-05 Abbreviated donor screening inappropriately used or not performed  
DS-02-06 Donor of viable, leukocyte-rich HCT/PS not properly evaluated for evidence of infection due to HTLV

DS-99-\*\*-\*\* Miscellaneous  
DS-99-01 Other

**DT-\*\*-\*\* DONOR TESTING (21 CFR 1271.80 and 1271.85)**

DT-01-\*\*-\*\* Testing not performed or documented when required, for:  
DT-01-01 Human immunodeficiency virus  
DT-01-03 Hepatitis B virus  
DT-01-04 Hepatitis C virus  
DT-01-05 Treponema pallidum  
DT-01-06 Human T-lymphotropic virus  
DT-01-08 Cytomegalovirus  
DT-01-11 Multiple tests  
DT-01-12 West Nile Virus

DT-02-\*\*-\*\* Testing incorrectly performed when required, for:  
DT-02-01 Human immunodeficiency virus  
DT-02-03 Hepatitis B virus  
DT-02-04 Hepatitis C virus  
DT-02-05 Treponema pallidum

DT-02-06 Human T-lymphotropic virus  
DT-02-08 Cytomegalovirus  
DT-02-11 Multiple tests  
DT-02-12 West Nile Virus

DT-03-\*\* Unacceptable specimen tested

DT-03-01 Specimen collected more than 7 days before or after recovery (except for peripheral blood stem/progenitor cells)  
DT-03-02 Specimen collected from donor 1 month of age or younger, instead of from birth mother  
DT-03-03 Specimen collected from a peripheral blood stem cell donor more than 30 days before recovery  
DT-03-04 Specimen storage conditions not met  
DT-03-05 Specimen did not meet requirements in test kit package insert *{includes filtered specimen, specimen collected in an expired tube, outdated specimen}*  
DT-03-06 Donor incorrectly evaluated for plasma dilution  
DT-03-07 Donor not evaluated, or evaluation not documented for plasma dilution

DT-04-\*\* Inappropriate test or test laboratory used

DT-04-01 Required test used was not licensed, approved, or cleared *{includes HIV/HCV NAT performed on pooled samples instead of individual samples}*  
DT-04-02 Required tests approved for cadaveric specimens not used when available  
DT-04-03 Laboratory performing tests not CLIA certified (or equivalent for CMS)  
DT-04-04 Laboratory performing tests not FDA approved

DT-99-\*\* Miscellaneous

DT-99-01 Other

**FA -\*\*-\*\* FACILITIES** (21 CFR 1271.190(a) and (b))

FA-01-\*\* Design

FA-01-01 Facility not suitable in size, construction, and/or location  
FA-01-02 Inadequate lighting, ventilation, plumbing, drainage and/or access to sinks and toilets

FA-02-\*\* Cleaning and sanitization

FA-02-01 Facility not maintained in a clean, sanitary, and orderly manner  
FA-02-02 Sewage, trash, and other refuse not disposed of in a timely, safe, and sanitary manner

FA-99-\*\* Miscellaneous

FA-99-01 Other

**EC-\*\*-\*\* ENVIRONMENTAL CONTROL** (21 CFR 1271.195(a))

EC-01-\*\* Environmental controls, when required, not performed or documented for

EC-01-01 Temperature controls  
EC-01-02 Humidity controls  
EC-01-03 Ventilation and air filtration  
EC-01-04 Cleaning and disinfecting of rooms and equipment to ensure aseptic processing operations  
EC-01-05 Maintenance of equipment used to control conditions necessary for aseptic processing operations

EC-02-\*\* Environmental controls, when required, incorrectly performed for

EC-02-01 Temperature controls  
EC-02-02 Humidity controls  
EC-02-03 Ventilation and air filtration  
EC-02-04 Cleaning and disinfecting of rooms and equipment to ensure aseptic processing operations

EC-02-05 Maintenance of equipment used to control conditions necessary for aseptic processing operations

EC-99-\*\* Miscellaneous  
EC-99-01 Other

**EQ-\*\*-\*\* EQUIPMENT (21 CFR 1271.200(a))**

EQ-01-\*\* Design

EQ-01-01 Equipment is not of an appropriate design for its use, and/or suitably located  
EQ-01-02 Equipment not capable of producing valid results

EQ-02-\*\* Maintenance

EQ-02-01 Cleaning, sanitization, or maintenance of equipment not performed or documented in accordance with established schedules

EQ-99-\*\* Miscellaneous  
EQ-99-01 Other

**SR-\*\*-\*\* SUPPLIES AND REAGENTS (21 CFR 1271.210(a) and (b))**

SR-01-\*\* Not verified to meet specifications for use

SR-01-01 Supplies  
SR-01-02 Reagents

SR-02-\*\* Reagent unsuitable

SR-02-01 Not sterile, where appropriate

SR-99-\*\* Miscellaneous  
SR-99-01 - Other

**RE-\*\*-\*\* - RECOVERY (21 CFR 1271.215)**

RE-01-\*\* Manner of recovery

RE-01-01 HCT/P contaminated, potentially contaminated, or cross-contaminated during recovery

RE-99-\*\* Miscellaneous  
RE-99-01 Other

**PC-\*\*-\*\* PROCESSING AND PROCESS CONTROLS (21 CFR 1271.220)**

PC-01-\*\* Processing

PC-01-01 HCT/P contaminated, potentially contaminated, or cross-contaminated during processing  
PC-01-02 HCT/Ps from two or more donors were pooled during manufacturing

PC-02-\*\* In-process controls

PC-02-01 Not followed  
PC-02-02 Inadequate

PC-03-\*\* In-process testing

PC-03-01 Sample not representative of the material to be evaluated

PC-04-\*\* Processing of Dura mater

PC-04-01 Available published validated process that reduces the risk of transmissible spongiform encephalopathy not used  
PC-04-02 Available published validated process that reduces the risk of transmissible spongiform encephalopathy used, but not verified

PC-99-\*\* Miscellaneous

PC-99-01 Other

**LC-\*\*-\*\* LABELING CONTROLS** (21 CFR 1271.250(a) and (b))

LC-01-\*\*-\*\* Procedures to control labeling of HCT/Ps

LC-01-01 Not established or maintained

LC-01-02 Did not prevent mix-ups

LC-01-03 Did not allow proper identification

LC-02-\*\*-\*\* Verification procedures not performed for:

LC-02-01 Accuracy, legibility, or integrity

LC-99-\*\*-\*\* Miscellaneous

LC-99-01 Other

**ST-\*\*-\*\* STORAGE** (21 CFR 1271.260(a) through (d))

ST-01-\*\*-\*\* Storage area and stock room not controlled to prevent mix-ups pertaining to the following items:

ST-01-01 HCT/Ps

ST-01-02 Supplies

ST-01-03 Reagents

ST-02-\*\*-\*\* Storage area and stock room not controlled to prevent contamination or cross-contamination pertaining to the following items:

ST-02-01 HCT/Ps

ST-02-02 Supplies

ST-02-03 Reagents

ST-03-\*\*-\*\* Storage temperature

ST-03-01 Not appropriate

ST-04-\*\*-\*\* Expiration date, where appropriate

ST-04-01 Incorrect or missing

ST-99-\*\*-\*\* Miscellaneous

ST-99-01 Other

**SD-\*\*-\*\* RECEIPT, PRE-DISTRIBUTION SHIPMENT, AND DISTRIBUTION** (21 CFR 1271.265(a) through (d))

SD-01-\*\*-\*\* Quarantined HCT/Ps

SD-01-01 Shipped without quarantine identification

SD-02-\*\*-\*\* Inappropriate distribution

SD-02-01 Distributed without review of required records

SD-02-02 Distributed without sign-off by a responsible person

SD-02-03 Quarantined HCT/P that was determined ineligible for release

SD-02-04 Contaminated or potentially contaminated HCT/P

SD-02-05 Release criteria related to expiration date of product not met

SD-03-\*\*-\*\* Inappropriate shipping conditions

SD-03-01 Temperature

SD-03-02 Packaging

SD-03-03 Container construction

SD-04-\*\*-\*\* Receipt of incoming HCT/P

SD-04-01 Not evaluated for the presence and significance of microorganisms and inspected for damage and contamination

SD-99-\*\* Miscellaneous  
SD-99-01 Other

??-??-?? DO NOT KNOW

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Last Updated: 10/1/2024