

# **Trending Observations for Combination Products**

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# DISCLAIMER

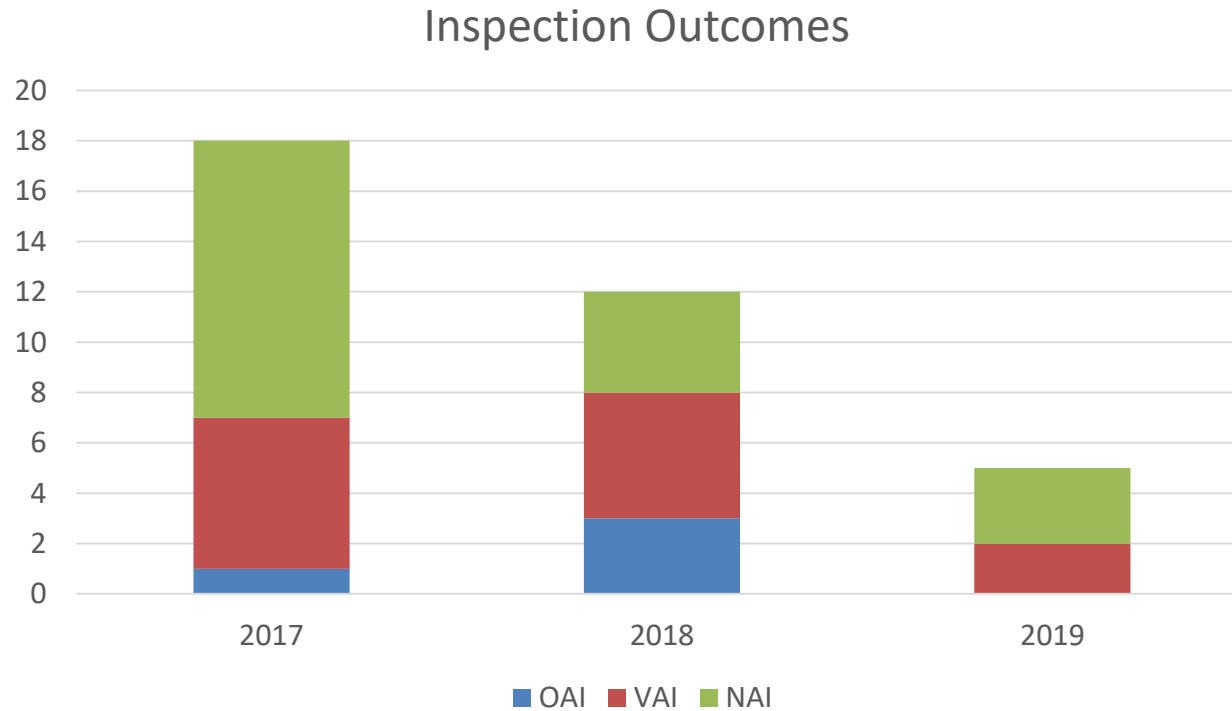
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# Content

- Inspection Classifications for Combination Products
- Predominant Citations for Combination Products  
Inspections from 2017-June 2019
- Adverse Events Related to Combination Products
- Field Corrective Actions Related to Combination  
Products
- References

# CDRH/ORR QS Inspection Outcomes from 2017-2019

*QS Inspection Outcomes for Combination Product from Division 2/Central*



# Predominant FDA-483 Citations for Combination Product from Div. 2

## *Top 5 FDA-483 Citations from January 2017 until June 2019*

- 820.70(a), (c) Production and Process Controls
- 820.100(a) Corrective and Preventive Actions
- 820.30 (i), (f) Design Controls
- 820.198(c) Complaint Files
- 820.40 Documentation Controls

# Predominant FDA-483 Citations for Combination Product from Div. 2(Cont.)

2017-2019

- *820.70(a) (c) Production and Process Controls*

Citations;

- (a) Process control procedures that describe any process controls to ensure conformance to specifications have not been adequately established.
- (c) Procedures to control environmental conditions have not been adequately established.

# Predominant FDA-483 Citations for Combination Product from Div. 2 (Cont.)

2017-2019

- *820.100(a) Corrective and Preventive Actions (CAPA)*

Citations;

- Procedures for Corrective Actions have not been adequately established.

# Predominant FDA-483 Citations for Combination Product from Div.2 (Cont.)

2017-2019

- *820.30 (i),(f) Design Controls*

Citations;

- (i) Procedures for design change have not been adequately established.
- (f) Procedures for design verification have not been adequately established.



# Predominant FDA-483 Citations for Combination Product from Div.2 (Cont.)

2017-2019

- *820.198 (a),(c) Complaint Files*

Citations;

- (a) Procedures for receiving, reviewing, and evaluating complaints by a formally designated unit have not been adequately established.
- (c) Complaints involving the possible failure of a device to meet any of its specifications were not investigated when necessary.

# Predominant FDA-483 Citations for Combination Product from Div. 2 (Cont.)

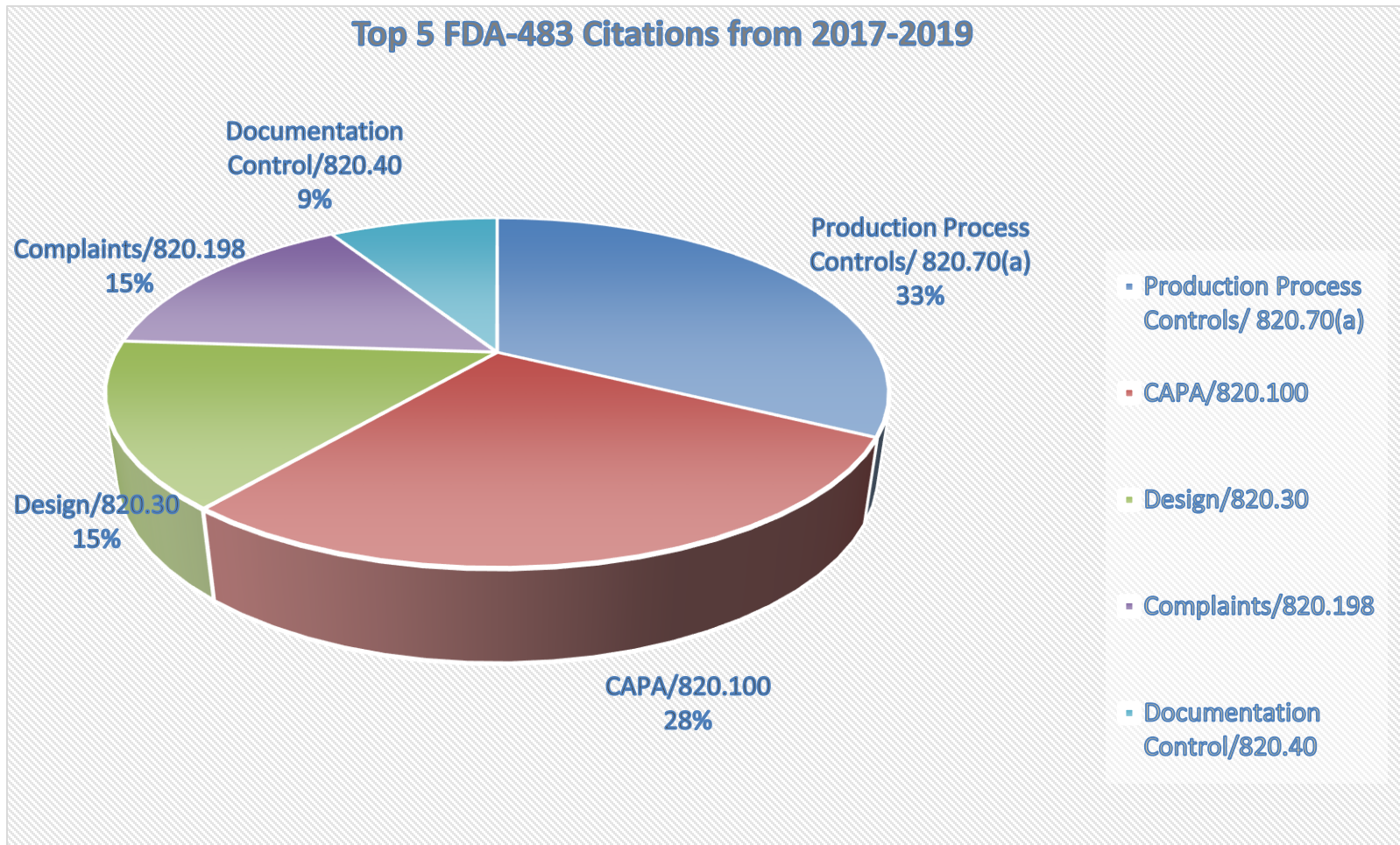
2017-2019

- *820.40 Documentation Control*
- *820.184 Device History Records*

## Citations;

- Document control procedures have not been adequately established.
- The device history record does not demonstrate that the device was manufactured in accordance with the device master record.

# Top FDA 483 Citations for Combination Product from 2017-2019 (Division 2)



# Adverse Events (Reported Problems) Related to Combination Products from 2017-2019

## Division 2

### *Infusion Pumps (Insulin)*

*Top 3 Reported problems from 2017-2019 from product code and all manufacturing firms:*

- An excess flow or over infusion of the infusion pumps.
- An insufficient flow or under infusion of the infusion pumps.
- False alarms of the infusion pumps.

# **Adverse Events (Reported Problems) related to Combination Products from 2017-2019**

## **Division 2**

### ***Drug Eluting Stent (Absorbable Coronary Drug Eluting Stent)***

*Top 3 Reported problems from 2017-2019 from product code and all manufacturing firms:*

- Material separation occurred for the drug eluting stent device.
- Malfunction/the absorb bioresorbable vascular scaffold may be related to under-expansion.
- Stents may not reabsorb as quickly as initially assumed and may be related to thrombosis, restenosis, target lesion failure.

# Adverse Events (Reported Problems) related to Combination Products from 2017-2019 Division 2

## *Collagen Surgical Mesh containing drugs (Surgical Mesh)*

*Top 3 Reported problems from 2017-2019 from product code and all manufacturing firms :*

- Material deformation/defective device.
- Incorrect, Inadequate or Imprecise Results or Readings.
- Material disintegration.

# Adverse Events (Reported Problems) related to Combination Products from 2017-2019

## Division 2

### *Autoinjector (Introducer, Syringe Needle)*

*Top 3 Reported problems from 2017-2019 from product code  
and all manufacturing firms:*

- A defective spring loading mechanism.
- A device operational issue, insertion issues.
- An unintended ejection, cannula does not release.

**Adverse Events (Reported Problems) related to Combination  
Products from 2017-2019  
Division 2  
*Drug Eluting Cardiac Stent***

*Top 3 Reported problems from 2017-2019 from product code and  
all manufacturing firms:*

- Material Integrity problems.
- Failure to sense/does not sense.
- Device sensing problems/ Over sensing.



# Adverse Events (Reported Problems) related to Combination Products from 2017-2019

## Division 2

### Catheter, Hemodialysis, Implanted, Coated

*Top 3 Reported problems from 2017-2019 from product code  
and all manufacturing firms:*

- The device fails to adhere or bond.
- The device is punctured/ leakage occurs.
- Material fragmentation of the device/ device quality problem.

# Adverse Events (Reported Problems) related to Combination Products from 2017-2019 Division 2

## *Inhalers*

*Top 2 Reported problems from 2017-2019 from product code  
and all manufacturing firms:*

- The drug is destroyed if carried at high temperature.
- The device shuts off in the middle of patient's treatment.

# **Adverse Events (Reported Problems) related to Combination Products from 2017-2019 Division 2**

## ***Dry Coated Peripheral Transluminal Angioplasty Catheter***

*Top 3 Reported problems from 2017-2019 from product code and all manufacturing firms:*

- Detachment of the device or the device component.
- A retraction problem with the device.
- A deflation problem with the device/material rupture.

# Adverse Events (Reported Problems) related to Combination Products from 2017-2019 Division 2

## *Condom with Nonoxynol-9*

*Reported problem from 2017-2019 from product code and all  
manufacturing firms:*

- No product problems reported.

# **Recalls Related to Combination Products from 2017-2019**

## ***Infusion Pumps (Insulin)***

*26 Recalls for Infusion Pumps from 2017-2019*

## ***Drug Eluting Stent (absorbable coronary drug eluting stent)***

*1 Recall for drug eluting stent from 2017-2019*

## ***Autoinjector (Introducer, Syringe Needle)***

*1 Recall for the Autoinjector from 2017-2019*

## ***Inhalers***

*7 Recalls for Inhalers from 2017-2019*

# References

- Office of Combination Products  
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- <https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfPCD/PCDSimpleSearch.cfm>
- CDRH's Total Product Life Cycle Database  
<https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfTPLC/tplc.cfm>

# Questions

