GQP/GVP/GPSP Division, Activity Summary of the 13th Term (April 2016 – March 2018)	
Study Group	**Study Group 1: GVP**
Subgroup	**P-1-A**
Theme	**Examination of quality assurance based on the concept of risk-based audits**

In JSQA, the GCP Division and the GLP Division examined quality assurance based on Risk-based Approach in the past (No. 131, No. 13C11, No. 15C11, and No. 15L05); however, the quality assurance has not been examined by the Postmarketing Division. Because the number of GVP operations has been increased rapidly due to worldwide reinforcement of PV regulations, there is an increased need for efficient and accurate GVP operations with limited resources.

In response to the need, Subgroup A, Study Group 1 of the Postmarketing Division (P-1-A) examined the possibility of effective improvement in the quality of GVP operations by incorporating the concept of Risk-based Audit (instead of testing all items, a great amount of effort is dedicated to checking high-risk items while saving efforts on low-risk items) into self-inspection of GVP operations. Specifically, risk assessment was performed by assuming risk faced by P-1-A (hypothetical company) as GVP (GPSP)-related findings listed in the previous deliverables and problems with high probability of occurrence, which were collected from group members. As a result, “collection” and “planning” involved a lot of high-risk items, and “procedures” and “planning” involved a lot of low-risk items. An audit plan was then prepared by reflecting the risk assessment results. As the audit plan, a mid- to long-term plan, annual audit plan, and individual audit plans were prepared under the audit policy based on Risk-based Approach.

Perceiving the risk is greatly affected by the characteristics of drugs and size of the company. In the deliverables of our group, an examination process, which is performed to determine an audit method for detection of risk, is indicated so that results can be used as reference in the actual situation faced by readers and each company. In an individual audit plan, “collection,” which is the highest-risk item in the Safety Management Division, has been selected as a specific example, and a checklist has been prepared based on the audit method. Self-inspection is performed as an “audit” by some companies while it is just “self-inspection” for other companies. For P-1-A, a GVP self-inspection plan is indicated as an “audit plan.”

GQP/GVP/GPSP Division, Activity Summary of the 13th Term (April 2016 – March 2018)	
Study Group	**Study Group 1: GVP**
Subgroup	**P-1-B**
Theme	**Analysis of risk detected during PV inspections by overseas authorities and PV audits** - Comparison between Japan, the United States, and Asia based on European regulations -

The globalization of the pharmaceutical market leads to a significant increase in pharmaceutical companies which should conduct Pharmacovigilance (PV) audits and should accept PV audits and PV inspections in accordance with the EU GVP Module. The global system for PV audits and/or PV inspections is essential to implement worldwide consistent PV and safety measures, and it is hoped that such global pharmaceutical companies shall establish such global system. However, some Japan-based marketing authorization holders (MAHs) neither have organized and established such global system sufficiently, nor understand matters to be focused on, focal points, and regionally specific regulations and operations adequately during PV audits and/or PV inspections.
Based on differences between the actual PV operations and regulations specified by Japan, the United States, and Asian countries based on European regulations, Subgroup B, Study Group 1 of the Postmarketing Division (P-1-B) evaluated risk, which could be pointed out by PV audits and/or PV inspections, based on the following respective items and put together information on characteristics, precautions, etc. to prepare “analysis of risk detected during PV inspections by overseas authorities and PV audits.”

Evaluation items
· Collection of safety information from divisions other than the PV Division, such as a call center
· Reference Safety Information (RSI)
· Qualified Person for Pharmacovigilance (QPPV) · Signal Management · Special Situations
· Quality Management System (QMS) · External Service Providers (ESP) · Compassionate Use
· Clinical Research · Post-marketing individual case reports · Aggregate Report (PSUR)
· Risk minimization and PV planning · Literature information/literature search · Annual Reports

Details of investigation/evaluation
·Risk: Evaluation of the possibility that there will be findings from PV audits and/or PV inspections on a scale of low/medium/high
·Actual situation/regulations in Europe: the EU GVP Module and activities based on the Module
·Actual situation/laws and regulations in Japan, the United States, and Asian countries: Relevant laws and regulations, and activities based on the laws and regulations
·Characteristics: Outline of differences between Europe and other regions
·Precautions: Precautions to be observed when accepting PV audits and/or PV inspections based on results of examination of differences of each item
·Examples of findings (reference): Things experienced in PV audits and/or PV inspections
·Discussion: Knowledge etc. required when accepting PV audits and/or PV inspections

We hope that the deliverables will be used as basic information when PV audit and/or PV inspection system is prepared based on the EU GVP Module and that they will help subsidiaries/partner companies in Europe, the United States, and Asian countries when they are subject to PV audits and/or PV inspections by overseas authorities.

GQP/GVP/GPSP Division, Activity Summary of the 13th Term (April 2016 – March 2018)	
Study Group	**Study Group 1: GVP**
Subgroup	**P-1-D**
Theme	**Examination of the self-inspection method for the Safety Management Implementation Division etc.**

In Subgroup D, Study Group 1 (hereinafter referred to as "the group"), the theme of the present term is "examination of the self-inspection method for the Safety Management Implementation Division." In order to establish and propose an audit/self-inspection method for the accuracy, completeness, and conservation of operations performed by the Safety Management Implementation Division etc., the group was divided into 4 teams to examine the following matters.

I. Examination of the self-inspection method for MR (branches/sales offices) (Team A)
II. Examination of the self-inspection method for the call center (section receiving inquiries) (Team B)
III. Examination of the self-inspection method for divisions other than MR and call center (Team C)
IV. Examination of the self-inspection method for outsourcing contractors and subcontractors (Team D)

After a recent scandal caused by a failure to report safety management information in the Safety Management Implementation Division, collection of safety management information was inspected, and the method for quality assurance was examined in the Safety Management Implementation Division (including outsourcing contractors and subcontractors). Then, deliverables were prepared.
For the examination, members of the group were asked about a scope of task in the Safety Management Implementation Division. As a result, the following 3 angles were set and grasped exhaustively because organizations (names) and Safety Management Implementation Division had been set differently by companies to which the members belonged.

- Target information: Literature, research, measures, spontaneous, and others
- Channels of collection: General implementation divisions (branches [sales offices], MR, call center, clinical studies/investigation, etc.), implementation divisions, which vary among companies (medical affairs, marketing, etc.), non-implementation divisions receiving adverse event information (public relations, market research, etc.), outsourcing contractors/subcontractors, and others
- Method for collection/reporting to the Safety Management Division: A flow from collection to reporting/procedures, clarification of involved parties, source documents (memos, voice), reporting forms (paper, electronic), and management database

Based on opinions that proposals could be made efficiently if the self-inspection method was examined by classifying implementation divisions (including outsourcing contractors etc.) based on the "channels of collection," the group was divided into 4 teams for examination. Major proposals made by each team are listed below.

Team A: Regarding self-inspection of MR, it is preferable that a self-inspector or person in charge in the control division checks the status of reporting of AE by having an interview with or sending a questionnaire to an implementation division in addition to inspection of AE report forms.

Team B: As the method for inspection in the call center, it is important to have the following 2 perspectives: “adequacy” as manuals (checking of the details of SOPs etc.) and “appropriateness (checking of operation records).”
Team C: It is desirable to know which divisions are subject to self-inspection and determine priorities for the self-inspection by examining which division is likely to fail to report, which division is likely to face serious risk, and others.
Team D: Because self-inspection of an outsourcing contractor is subject to contractual restrictions, it is necessary to know problems of the outsourcing contractor, risk associated with a failure of collection, and so forth in advance and to make sure that inspection can be performed at an equivalent level to that of one’s company. Overall, it is important for relevant parties to know that self-inspection ensures the reliability of safety management activities by inspecting the compliance with regulations/procedures and gives an opportunity for implementation divisions to improve their activities.

We hope that the deliverables prepared by the group will contribute to quality assurance performed by those belonging to the Safety Management Implementation Division and quality assurance performed by outsourcing contractors and help people involved in collection of safety management information (regardless of whether or not they belong to the Safety Management Implementation Division) in assuring the quality of safety assurance activities.

GQP/GVP/GPSP Division, Activity Summary of the 13th Term (April 2016 – March 2018)	
Study Group	**Study Group 2: GPSP**
Subgroup	**P-2-A**
Theme	**Basic GPSP self-inspection methods** - Examination of self-inspection for post-marketing surveillance etc. -

Study Group 2 of the Postmarketing Division performed various activities to examine self-inspection methods from the perspective of reliability assurance for post-marketing surveillance activities and prepared deliverables summarizing the results. Many of those previous deliverables are still very useful; however, some need to be reviewed to fit with the times. Therefore, the group examined and updated the deliverable, "GPSP self-inspection methods – examination of self-inspection of use results surveillance –" (Document No. 07X02) (hereinafter referred to as "07X02"), which was examined during a period from fiscal 2006 to 2007 by Subgroup A, Study Group 2 of the Postmarketing Division at the time.
Ten years have already passed since 07X02 was prepared. The way companies think about self-inspection and inspection methods have gradually been changed during the period, and there is no wide gap in perception among companies in these days. The meaning of reviewing and updating of 07X02 was found, and the following matters, which were not discussed sufficiently back then, were examined so that the content of the present deliverable was improved.

- "Self-inspection activities" were newly added as items subject to inspection.
- Based on the facts that self-inspection by a contract giver is important in cases where operations, which are performed after case registration, are outsourced to CRO and that the number of outsourcing-related findings and directions from PMDA conformity inspections is increasing, confirmation items for "outsourced tasks" are updated by reference to the previous deliverables, "investigation of self-inspection methods for outsourced GPSP (Good Post-marketing Study Practice) tasks - assuming partial outsourcing of use results surveillance tasks to a CRO (Contract Research Organization) - (P-2-D)" (Document No. 11X06) and "self-inspection techniques pertaining to outsourced tasks (sales companies, CRO etc.) (P-2-A)" (Document No. 15X04).
- Confirmation items for "reexamination application dossiers" are updated by reference to the previous deliverable, "GPSP self-inspection methods - examination of self-inspection for reexamination application dossiers -" (Document No. 11X03).

The present deliverable was prepared based on the assumption that it would be used by a beginner in post-marketing surveillance activities or person in charge of self-inspection, who is relatively inexperienced in post-marketing surveillance activities.
In the first section of confirmation items for each operation, the "concept of self-inspection" and "frequency/timing of self-inspection" were presented. A "checklist" was prepared in tabular form, containing confirmation items, documents to be checked, and relevant regulations used as the basis for checking so that it could be processed easily when used as a self-inspection checklist by each company. Documents (target period: 2014 to 2017) released by PMDA at lecture meetings etc. were checked again. Excerpts from the documents were categorized into relevant items as "findings from PMDA etc. and precautions" and added so that the deliverable could be used as a tool for sharing information on administrative/industry trends of recent years. The "concept of and method for self-inspection of reexamination application dossiers" were summarized in the last section. This is also one of the characteristics of the deliverable.

In October 2017 (at the end stage of the activity period of the group), the "Ordinance for Partial

Revision of the Ordinance on Standards for Conducting Post-marketing Surveillance and Studies on Drugs" was released, and subsequently, notifications related to reexamination application and periodic safety update reports etc. were released. Unfortunately, these changes in operating environment could not be reflected in the examination performed by the group. However, this will lead to future examination by JSQA. We hope that the deliverable of the group will contribute to further improvement of the reliability of post-marketing surveillance etc. performed by each company.

GQP/GVP/GPSP Division, Activity Summary of the 13th Term (April 2016 – March 2018)	
Study Group	**Study Group 2: GPSP**
Subgroup	**P-2-B**
Theme	**Examination of cases from conformity inspections of reexamination application dossiers**

New drugs etc. are subject to reexamination based on the provisions of Article 14-4 of the Act on Securing Quality, Efficacy, and Safety of Pharmaceuticals, Medical Devices, Regenerative and Cellular Therapy Products, Gene Therapy Products, and Cosmetics (hereinafter referred to as "PMD Act"). Data collected and prepared in accordance with the following ministerial ordinances and regulations must be attached to reexamination application dossiers: parts of the "Ordinance on Standards for Conducting Post-marketing Surveillance and Studies on Drugs," "Ordinance on Standards for Conducting Post-marketing Surveillance and Studies on Medical Devices (Good Post-marketing Study Practice; GPSP Ordinance)," "Ordinance on Standards for Post-marketing Safety Management of Drugs, Quasi-drugs, Cosmetics, Medical Devices, and Regenerative Medical Products (Good Vigilance Practice; GVP Ordinance)," and "Enforcement Regulations of the Act on Securing Quality, Efficacy, and Safety of Pharmaceuticals, Medical Devices, Regenerative and Cellular Therapy Products, Gene Therapy Products, and Cosmetics (hereinafter referred to as "Enforcement Regulations of the PMD Act")," as well as the "Ordinance on Standards for Conducting Clinical Trials on Pharmaceuticals" and "Ordinance on Standards for Conducting Clinical Trials on Medical Devices (Good Clinical Practice; GCP Ordinance)."

Marketing authorization holders etc. strive to assure the reliability of reexamination application dossiers by constructing an organizational framework for complying with the Enforcement Regulations of the PMD Act and ordinances and by specifying operating procedures for post-marketing surveillance activities and post-marketing safety management activities. The reexamination application dossiers prepared in that manner will be reviewed only after a notification of "Compliant" results of a conformity inspection performed by the Pharmaceuticals and Medical Devices Agency (PMDA) is received. Therefore, knowing specific findings from conformity inspections by PMDA will be helpful in objective self-evaluation of own activities and conduct of more reliable activities and will also be useful for a smooth transition to a review.
To date, Subgroup B, Study Group 2 of the Postmarketing Division has carried out questionnaire surveys targeting corporations belonging to the Division to collect findings etc. of conformity inspections and provided feedback. In this term, our group conducted questionnaire surveys in September 2016 and May 2017 to collect findings etc. of conformity inspections performed during a period from April 2015 to March 2017 and subdivided the findings (1. GVP, 2. Outsourcing management, 3. Self-inspection, 4. Education and training, 5. Storage of documents, 6. Reinvestigation, 7. Procedures, 8. Deviations from procedures, 9. DM/tabulation analysis, 10. CSV, 11. Writing, 12. Basic plans for post-marketing surveillance etc., 13. Reporting to marketing authorization holders etc., and 14. Others) to examine the backgrounds, trends, points to keep in mind, and so forth. We hope that the information will be used as reference along with the findings for your daily work.

Regarding the "outsourcing management, DM/tabulation analysis, reporting to marketing authorization holders etc., and others," a panel discussion was held at the "conference for reviewing cases from conformity inspections of reexamination application (on March 02, 2018)."

GQP/GVP/GPSP Division, Activity Summary of the 13th Term (April 2016 – March 2018)	
Study Group	**Study Group 2: GPSP**
Subgroup	**P-2-C**
Theme	**Quality assurance techniques using EDC for use results surveillance** - From start-up to closing of ASP-type EDC -

An increasing number of post-marketing surveillance activities are using EDC systems (hereinafter referred to as “EDC surveillance”). Many of the systems are packages created by vendors, and a large part of a system lifecycle has been outsourced to a vendor.
When EDC surveillance is performed, requirements of a user, pharmaceutical company (hereinafter referred to as “manufacturer”), must be reflected in an EDC system. The requirements need to be documented as User Requirement Specification (URS) to check whether or not the EDC system satisfies the requirements by “computerized system validation (CSV).”
However, the department in charge of post-marketing surveillance, which introduces an EDC system, does not always have workers who are familiar with the EDC system, and the period from marketing approval to implementation of surveillance is short. Because of the constraints, preparation of URS is outsourced to a vendor, and requirements are determined/approved upon consultation in some cases.

Based on the circumstances, points to keep in mind and others were put together in the previous term by extracting necessary self-inspection items and inspection methods mainly on ”start-up to full functionality” of ASP-type EDC systems (which are mainstream now) by reference to findings from conformity inspections, various notifications, EDC management sheets, etc.
In the present term, we continued to work on the theme of the previous term, “quality assurance techniques using EDC for use results surveillance,” and examined the closing of EDC systems, which was not covered during the previous term. Also, in order to understand the actual CSV situation in each company, “fact-finding questionnaires regarding quality assurance using EDC for use results surveillance” targeting companies belonging to the Postmarketing Division were conducted. Based on the results, the deliverables from the previous term were revised by examining how CSV (requirement of the ER/ES policy) could be secured, how responsibilities of a manufacturer (contract giver) should be carried out as required by the GPSP Ordinance, and so forth.

We hope that the present deliverable will be of some help to member companies using EDC systems for self-inspection and useful in ensuring the reliability of the EDC systems.

GQP/GVP/GPSP Division, Activity Summary of the 13th Term (April 2016 – March 2018)	
Study Group	**Study Group 3: GQP**
Subgroup	**P-3-A**
Theme	**Training for person who audits pharmaceutical manufacturing plant** - Fostering of auditors for solid dosage form -

Study Group 3 of the Postmarketing Division examined the details of training given to a person who audits pharmaceutical manufacturing plant (hereinafter called "Auditor") based on results from the theme of the previous term, "actual practice of training for Auditor."

In the previous term, the group conducted a questionnaire targeting marketing authorization holders belonging to the Postmarketing Division of JSQA and received answers from 36 companies regarding training given to Auditor. As a result, the actual practice of training was revealed as follows: (i) About 60% of marketing authorization holders does not have concrete training programs; (ii) 80% or more of marketing authorization holders does not evaluate the capability of Auditor continuously; and (iii) 90% or more of marketing authorization holders does not implement training at different levels of Auditor. We, P-3-A members, prepared the deliverables targetted on to improve the situation.

The details of "training given to Auditor" differ depending on items being manufactured at manufacturing plants subject to audit. Therefore, the deliverables were prepared only focusing on solid dosage form with the following preconditions: "manufacturing plants of film-coated tablets with a single active pharmaceutical ingredient, which will be packed in PTP."

In the deliverables, Auditor are classified into 3 levels, "Beginner," "Lead," and "Senior." Their necessary knowledge and skills as well as their roles etc. are described as specifically as possible. We set a manufacturing plant model in the deliverables in order to specify the scope of an on-site tour during an audit of a manufacturing plant and the tips for checking documents at each level of Auditor. Furthermore, points to be checked both in the manufacturing process and documents are listed.

Lastly, we proposed feedback sheet and discussion-type questions for evaluation of the Auditor's capability.

For marketing authorization holders who supervise manufacturing plants, audits of manufacturing plants have an important role in assuring the constant quality of drug product as well as drug substance. We hope that the deliverables will be of some help to instructors and useful in providing training to Auditor for maintenance/improvement of the "quality" of audits.

GQP/GVP/GPSP Division, Activity Summary of the 13th Term (April 2016 – March 2018)	
Study Group	**Study Group 3: GQP**
Subgroup	**P-3-B**
Theme	**Clause-by-clause interpretation of the PIC/S GDP Guide** - For introduction of the Japanese version of GDP guidelines -

Subgroup B, Study Group 3 of the Postmarketing Division of JSQA consists of members who want to exchange information with other companies in the same industry and to prepare for GDP that will be required in Japan. We want to propose what should be done for introducing GDP with thorough understanding of the PIC/S GDP Guide (PIC/S Guide to Good Distribution Practice for Medical Products, effective on June 01, 2014) from the view of those who engage in the actual operation. The proposals were put together in the present deliverable as a clause-by-clause interpretation of the PIC/S GDP Guide.
Differences between the Japanese version of the GDP guidelines and PIC/S GDP Guide were planned to be analyzed and included in the deliverable after release of the Japanese version of the GDP guidelines during our activity period; however, because the Japanese version of the GDP guidelines was not released during the period, only the clause-by-clause interpretation of the PIC/S GDP Guide was included in the deliverable. After the Japanese version of the GDP guidelines is released, a lot of interpretations will probably be published by industry organizations and consultants. Since we suppose the PIC/S GDP Guide will serve as a base for GDP, information was provided in a way that the basic concept the PIC/S GDP Guide could be confirmed.

In the deliverable, the background to the PIC/S GDP Guide was briefly explained first. For the clause-by-clause interpretation of the original PIC/S GDP Guide, essential points and their interpretations, and points to be handled were described in each clause. In the section of essential points and their interpretations, intent described in each clause was summarized briefly. In the section of points to be handled, specific cases and information on related regulations or guidelines etc. as well as glossary were provided so that the person in charge of the actual operation could determine what he/she should do based on the information.
PIC/S GDP and PIC/S GMP have many items in common (examples: Quality Management, Employees, Premises, Documentation, Complaints and Recalls, and Self-inspections and so on). As well, the concept of GDP is suggested in Article 7 of the GQP Ordinance. It can be probably be said GDP is not the concept which has emerged suddenly, but it had gradually been embodied and became visible after Japan joined as PIC/S members.
Items unique to PIC/S GDP Guide are the conduct of Operations (Chapter 5), Falsified drugs (Chapter 6.4), and Transportation (Chapter 9). The importance of environmental control, including temperature control is mentioned. It also calls attention from the perspective of security in each distribution process. Requirement of qualification of customers (sale destinations) as well as suppliers is another unique item. A risk-based approach is required to determine what and to what extent it should be done and this idea is the same as that of GMP.

While preparing the deliverable, we found that there are so many things that have been performed conventionally. On the other hand we felt systemization and documentation of operations, which Japanese people are not good at, are insufficient in many areas. There are many unclear points when GDP is applied to Japan: to what extenet each marketing authorization holder should/can intervene in the operation of wholesale distributors. For those who wonder how GDP should be introduced, we would like to make the following proposals:

- Put together activities being performed currently.
- Compare the current activities with the deliverable.

Just take the first step, and you will see something. Please open the deliverable when you are wondering, and think what GDP is trying to convey and when you can say that you are operating GDP.

GQP/GVP/GPSP Division, Activity Summary of the 13th Term (April 2016 – March 2018)	
Study Group	**Study Group 3: GQP**
Subgroup	**P-3-C**
Theme	**Research of findings from inspections by PMDA, FDA, and EMA** - Questionnaire survey about cases etc. that are difficult to be handled -

As the theme of activities in the present term, Subgroup C, Study Group 3 collected information on inspections performed by regulatory authorities in three regions and analyzed gaps among them to find characteristics and similarities among the inspections so that deliverables could be prepared for the purposes of discovering a new perspective on GMP audits and improving GMP activities at one's manufacturing plants etc. In the beginning, findings from inspections by regulatory authorities were planned to be collected by members of Subgroup C and analyzed to find characteristics and similarities. However, due to a limited number of group members, the approach was changed, and a questionnaire targeting companies belonging to Study Group 3 of the Postmarketing Division was conducted to collect information on inspections performed by regulatory authorities in three regions. Specifically, companies belonging to Study Group 3 of the Postmarketing Division were asked to provide the following information in a free format regarding inspections performed by authorities in the past 5 years or so: "findings that were difficult to be handled," "how they were handled," and "questions they wanted to ask other companies." Then, information associated with recent GMP topics and information of interest to member companies were selected from the information collected, and a questionnaire was conducted again to ask the companies belonging to Study Group 3 of the Postmarketing Division about the actual operation status, findings received from authorities, and so forth. Based on results of the questionnaire, the following 6 items were selected. Members of Subgroup C believed that the items were associated with recent GMP topics and information of interest to member companies.

a. Data Integrity
b. Sampling of excipients
c. Quantitative evaluation of OJT education
d. Eligibility requirements to become a self-inspector (person performing self-inspection)
e. Interpreters
f. Understanding of requirements unique to Japan

The 2nd questionnaire was conducted to ask the companies belonging to Study Group 3 of the Postmarketing Division about the above 6 items to grasp the handling status at each company and instructions given by authorities. The questionnaire was sent to 32 companies, and a response was received from 8 companies. The 8 companies provided us with information on 10 inspections, and the results were discussed within the group.

GQP/GVP/GPSP Division, Activity Summary of the 13th Term (April 2016 – March 2018)	
Study Group	**Study Group 3: GQP**
Subgroup	**P-3-D**
Theme	**Case study of deviations control on GQP/GMP**

Subgroup D, Study Group 3 of the Postmarketing Division, worked on the continued theme from the 12th term, "Case study of deviation control on GQP/GMP." From the perspective of quality assurance by marketing authorization holders, deviation cases were defined as events that needed to be handled by the quality assurance personnel in accordance with Article 11 of the GQP Ordinance, "handling of quality information and quality defects etc.," and 22 deviation cases were collected from members of the group (buildings and facilities [4 cases], management of raw materials and packaging/labeling materials [3 cases], manufacturing and in-process control [including tests] [6 cases], packaging and labeling [3 cases], storage and release from manufacturing plants [3 cases], and test management [3 cases]). Case studies were performed regarding each deviation cases to determine what happened (handling of items affected, and classification), why it happened (cause investigation), and what was done to prevent it from happening again (CAPA).

The deviations were categorized into 3 classes based on the impact on products; whether the products had already been released to the market, whether the deviation is regarded violation of the PMD Act or quality defects, possibility of removal of the impact, and so forth. The classification is needed to decide deviation handling procedures which is the requirement of Article 11 of the GQP Ordinance.

As a result of this case study, marketing authorization holders may need to focus on the following points when they evaluate deviation information received from manufacturer.

(1) Evaluation of the possibility of quality defects

Deviation information (comprehension of facts), emergency measures (prevention of the spread of damages), and classification of deviations (primary evaluation, clarification of risk caused by deviations) should be evaluated.

(2) Investigation of the cause of deviations and handling of the product

Investigation/identification of the cause of deviations, handling of lots affected by the deviations, classification of the deviations based on investigation results (secondary evaluation), and its reasons should be made obviously.

(3) Identification of the root cause and CAPA implementation

The Quality Assurance Manager of a manufacturing authorization holder evaluates deviation information promptly and properly to determine the impact on the quality, efficacy, safety, and human health. Based on evaluation and following investigation, it is necessary to determine whether the deviation causes quality defects or whether manufacturing control and quality control are needed improvement. It would be grateful if the model cases will be useful for everyone's business.

GQP/GVP/GPSP Division, Activity Summary of the 13th Term (April 2016 – March 2018)	
Study Group	**Special Project Group 1**
Subgroup	**P-T-1**
Theme	**Examination of prefectural inspection cases related to marketing business license for drugs and medical devices (GQP・QMS/GVP)**

GQP/GVP inspections related to marketing business licenses by prefectural governments started in 2005. JSQA established Special Project Group 1 (hereinafter referred to as "the Project") in the Postmarketing Division in fiscal 2006 to collect inspection cases from member companies through questionnaire surveys and to provide information for maintenance and improvement of GQP/GVP compliance systems. The Project conducted 7 questionnaire surveys during a period from fiscal 2006 to 2015 and summarized the results in 6 Postmarketing Division reports (No. 07X09, No. 09X01, No. 09X02, No. 10X01, No. 13X04, and No. 15X11). In 2014, the "Ordinance on Standards for System of Manufacturing Control and Quality Control of Medical Devices and In-vitro Diagnostics Reagents (hereinafter referred to as "QMS Ordinance")" went into effect. Cases to be investigated for confirmation of compliance with the QMS Ordinance were also included in the 8th questionnaire.

The 8th questionnaire included inspection cases observed in and after April 2015. On January 30, 2017, the questionnaire started to be sent to 83 representative member companies of the division. A response was received from 51 companies, and 29 inspection cases were obtained from 27 companies (17 cases from Tokyo, 6 cases from Osaka, and 6 cases from other prefectures). Regarding the compliance with the QMS Ordinance, which was newly included in the 8th questionnaire, 4 cases were obtained (license renewal investigation: 2 cases, investigation of compliance with the QMS Ordinance by Osaka: 2 cases).

From among the responses, 127 answers on findings etc. (GQP-related: 66 cases, QMS-related: 16 cases, and GVP-related: 45 cases) and 279 answers on the investigation status (GQP-related: 115 cases, QMS-related: 5 cases, and GVP-related: 159 cases) were selected to be introduced to members by the project.

Regarding GQP-related answers, findings etc. (16 cases) related to agreements with manufacturers (related to Article 7 of GQP) and findings etc. (15 cases) related to securing of proper manufacturing control and quality control (related to Article 10 of GQP) account for a large percentage of the answers. Many of the agreement-related findings are associated with unconcluded agreements, and many of the manufacturing/quality control-related findings are associated with GMP investigation performed by marketing authorization holders against manufacturers. The number of answers on the investigation status related to these findings are 13 and 29, respectively.

Regarding QMS-related answers, all of the 16 findings are associated with preparation of standard codes/procedures etc. for quality control supervising systems, and development of a documentation tree and procedures has been required.

The most common answers on GVP-related findings etc. (11 cases) are associated with examination of safety management information and planning (related to Article 8 of GVP) of safety measures based on examination results. They are related to procedures etc. for evaluation of safety management information collected.

In addition to provision of information on cases included in answers to the questionnaire, the Project presented 90 ideas regarding points to be checked during self-inspection, points to be taken into account during operations, things to be prepared for smooth inspections, and so forth as needed by providing a section of "editor's comments." We hope that the information helps you to improve and enhance GQP/QMS/GVP compliance systems.

GQP/GVP/GPSP Division, Activity Summary of the 13th Term (April 2016 – March 2018)	
Study Group	**Special Project Group 2**
Subgroup	**P-T-2**
Theme	**The Planning, Development, and Implementation of Self-inspectors (GVP/ GQP/ GPSP)**

Special Project Group 2 set up "Discussions on Education and Training for Self-inspectors" as its group theme in the 13th term (fiscal year of 2016-2017). The group planned and conducted educational training courses for both JSQA members and non-members, evaluated results of each course and took actions for improvements for future educational training courses.
This theme has been continued since the 12th term, however the Special Project group of the 13th term was started as a very small group because the number of group member was only 3 at the beginning (2 of them have continued to participate in the group since the previous term). Therefore, it was decided that Post-marketing division management, such as Division Chief, Director and Auditors, participated in the group, and also decided that the group started its activities aiming to conduct an educational training course related to GVP- GPSP once in the fiscal year of 2016. We also run its activities with intention of renewing educational training courses, while considering educational training courses conducted in the previous term. The number of the group members was increased; genuinely 2 people-increased, until the end of fiscal year of 2017 and the group could run smoothly throughout the 13th term.
We achieved 2 major results during the 13th term. As for the first achievement, we conducted the following 3 educational training courses and 1 lecture meeting. Regarding the Educational Training Course- GVP/GPSP BASIC, the course was conducted again in 2018, after making revisions on program and materials of the first course conducted in 2016. Due to the revisions, the course can be stably conducted on regular bases in the future.

- ✧ Educational Training Course- GVP/GPSP BASIC "Self-inspection Techniques (General introduction)" conducted on November 11, 2016
- ✧ Lecture Meeting- "Quality Management System of Medical Devices, Understanding characteristic features of medical devices and real meaning of QMS" conducted on March 16, 2017
- ✧ Educational Training Course- GQP BASIC "Management conditions and issues of Marketing Authorization Holders related to GQP, searched through PMDA's GMP inspections" conducted on November 17, 2017
- ✧ Educational Training Course- GVP/GPSP BASIC "Self-inspection Techniques (General introduction)" conducted on February 2, 2018

All seats were sold out in these 3 educational training courses and more than 50 people participated in the lecture. As a result, we could provide educational opportunities for about 140 people through JSQA in the 13th term. According to results of the questionnaires for participants of these courses and the lecture, each course and lecture could get very high evaluation results on level of participant's understanding, course/ lecture contents and level of participant's satisfaction. Every time we conducted a course/ lecture, we repeated a review-cycle, meaning we have discussed lessons-learned, identified issues, reviewed actions for improvements and proceeded with the actions. Through the cycle, we could achieve efficient solutions for course impremention using limited human resources and those for know-how knowledge utilization and transfer. Especially, we thought it is not ideal that the knowledge transfer depends a lot on a group member who continues to participate in the group between terms. We tried to archive our

materials in JSQA's drive, not only slides which were used in the courses but also documents which were created for course preparations.

As for the second achievement, we developed a big picture of educational training courses in Post-marketing division as a document, "Framework of JSQA Post-marketing Division Educational Training Courses". We expect that this framework could help future training sessions in a planned and consistent way. This framework consists of two parts, "Overview of Educational Training Courses" and "Outline of each Educational Training Course". The Outline provides a list of purposes, targets and contents for the courses. While we were developing the framework, we had opportunities to observe beginner courses in GLP and GCP divisions. Unfortunately, there was not sufficient cooperation in training area among the divisions in the past. We could learn a lot from their frameworks and course programs and utilize what we learned not only for developing our framework but also for conducting our courses in 2017 and 2018.

In order to conduct educational training courses stably and regularly and to develop new courses in the future, we found some challenges below:

- ✧ Insufficient human resources in a training group (current Special Project group 2). It is necessary to set the environment in which each group member can be easy to work for JSQA's educational training. Providing more incentives for a group member and his/her company may help to solve the challenge.
- ✧ Insufficient human resources of instructors. There would be performance and operational limits, if we try to run a course only by internal instructors in a training group (current Special Project group 2). It would be better to accelerate the use of external instructors and to get more supports from other groups in Post-marketing division/ other JSQA divisions. If there is a course which could be run by joint hosting among JSQA divisions, for example Beginner course, it would be ideal to pursue collaboration between the divisions.
- ✧ More efficient executions using limited human resources and those for know-how knowledge utilization and transfer, especially between terms.
- ✧ Review the priorities of course execution and course development and put resources on a course which JSQA members really need. It would not be necessary to pay a lot of attention to three-layer course structure, such as Beginner, Basic and Advanced. Providing a training session about a hot topic which JSQA member want to have would be ideal.

This theme will continue to be discussed in the next term. We hope that more members would be included into activities for planning and conducting JSQA's educational training and the educational training would become more efficient for each member.