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Analysis of the Advantages of and Barriers to Adoption of Smart Manufacturing for Medical Products – Focus on Response to Emerging and Pandemic Threats such as SARS-CoV-2

MxD 20-19-01 – FDA OCET Project - Executive Summary

ISSUED 30 JUNE 2021

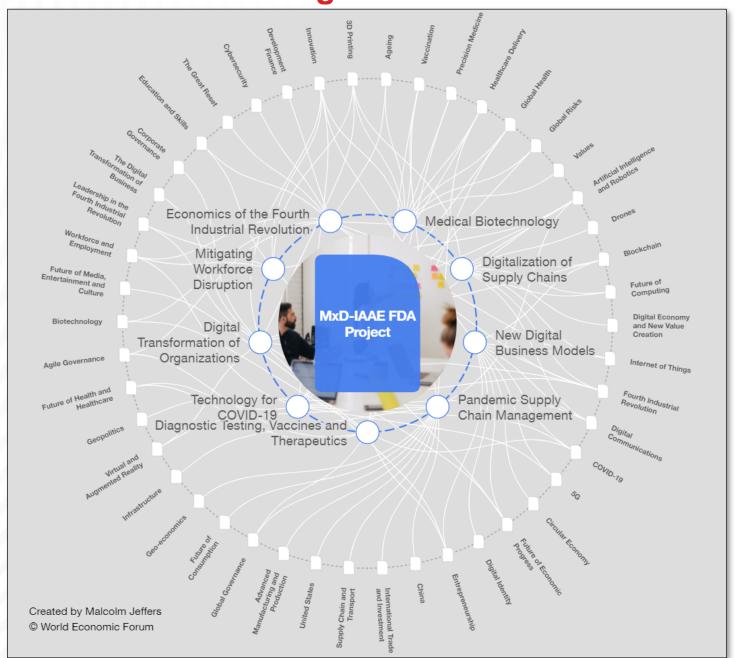
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06 JUL 2020 - 30 JUN 2021

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Context of Technologies and Themes



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- Future of tesp themes, in the context of regulated industry 4.0 pharmaceutical
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- The Digital Transformation of **Business**
- Cybersecurity
- Innovation

Level of Digital Mastery – Results and Analysis

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No overarching vision

Based on responses to silvey

questions under the category

of Business Process factors it

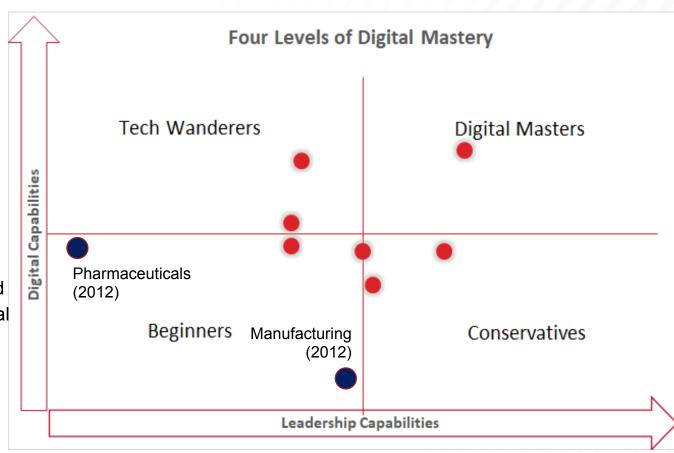
was determined that very few manufactures wision, but may be underdeveloped manufactures wision, but may be underdeveloped manufactures wision, but may be underdeveloped manufactures. The state of the

Detailed recommendations Active steps to build digital skills and culture were given to each

maritiacturer in a site-specific

report. Strong overarching digital vision

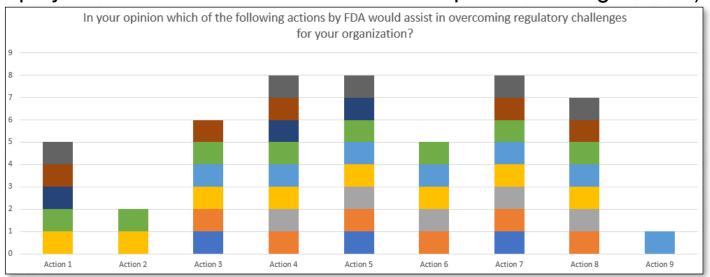
- Excellent governance across silos
- Many digital initiatives generating business value in measurable ways
- Strong digital culture



Level of digital mastery (all participating manufacturers that completed business process surveys) (n=7)

Selection of Key Findings – Regulatory Factors

Manufacturers responded to a list of suggested actions from a 2020 National Academies report (N=9; Other = FDA employees to be more consistent in both inspections and guidance)



- Action 1: Work with the industry to distinguish regulatory language from descriptions of scientific or engineering principles and practices (e.g., the term 'control').
- Action 2: Communicate innovation value proposition in the context of the pharmaceutical supply chain, financials, and operations.
- Action 3: For FDA to give greater presence in FDA's discussions of new control approaches and innovations relating to concepts of "people, process, and technology" and related business processes such as stage gating and change management.
- Action 4: Become familiar with condition-based monitoring approaches and provide incentives for their use.
- Action 5: That inspection staff have the expertise to understand the technologies and best practices in their application.
- Action 6: For FDA to influence standards for modularization that have integrated sensing and control technologies.
- Action 7: For FDA to become more aware of the trend towards greater use of expert-system digitized work instructions.
- Action 8: Relating to innovations in sensing, modeling, ML applications, and advanced control, for FDA to issue focused guidance on cGMP implementation and expectations for their management.
- Action 9: Other

Project team analysis

The project team conducting this study decided to build upon work carried out during 2020 by reflecting back these suggested actions to each of the nine site-level regulatory factors interviewees, noting the participants agreement or disagreement, and related clarifications on each suggestion.

Note: These are the responses of the participants or syntheses of their comments.

Useful Links:

1. FDA-funded study (PDF, 2.2 MB), conducted by MxD and IAAE (MxD 20-19-01 – FDA OCET Project - Executive Summary)

https://www.fda.gov/media/152569/download

2. <u>Analysis of the Advantages of and Barriers to Adoption of Smart Manufacturing for Medical Products</u> (infographic) (PDF, 760 KB)

https://www.fda.gov/media/152568/download

