

XVII Corso Nazionale di Aggiornamento SIdEM
Parallela SIdEM-GITMO
Aggiornamento in tema di raccolta e conservazione di cellule
emopoietiche

Recepimento dello Standard JACIE nel Laboratorio di Manipolazione

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INTERNATIONAL STANDARDS FOR CELLULAR THERAPY PRODUCT COLLECTION, PROCESSING, AND ADMINISTRATION



Part D: Processing Facility Standards

Activities

Processing
Storage
Distribution

CTP (from living donors)

BM, PB, CB cells
TC-T, TC-MSC, TC-NK, TC-Tregs
cells

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FACT-JACIE Standards:
professional standards
designed to provide
minimum guidelines for
quality care and
laboratory practice



EUD 2004/23/EC: “Setting
standards on quality and safety
fo the donation, procurement,
testing, processing preservation,
storage and distribution of
tissue and cells”.
EUD 2006/17/EC and EUD
2006/86/EC

EUD 2001/83/EC and ATMP for cellular
therapy products used in clinical trials (GMP
manufacturing license)

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Processing Facility

.... Adequate space, design and location....to minimize the risk of errors (ie cross-contamination, mix-ups, improper labeling)....



***SAFETY OF CTP AND PERSONNEL,
PATIENTS, DONORS***



- **Defined areas** for receipt, processing, storage , research activities (*defined workflow*)
- Process to **control storage areas** (individual freezers, unequivocal labeling, quarantine etc)
- **Access** to facility limited to authorized personnel
- **Prevention** of introduction, transmission or spread of communicable disease

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Critical facility parameters

- Temperature
- Humidity
- Ventilation
- Air quality (particle counts and/or microbial colony counts)
- Surface contaminates

“Open Systems”!!

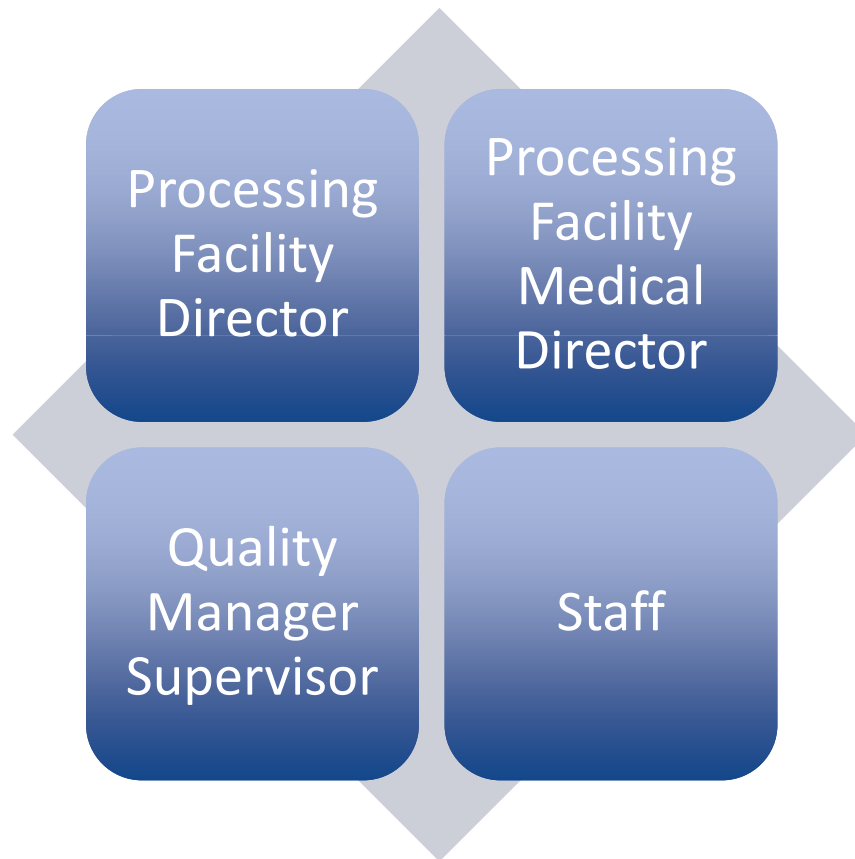


EUD /86/EC and GMP guidelines:

Grade A : environment to CTP are exposed during processing

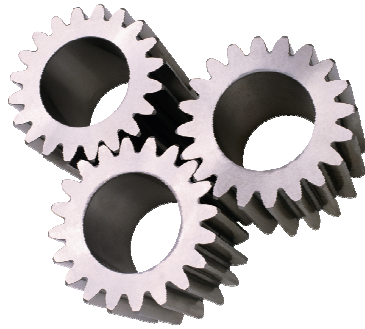
Grade D background environment
(as regard to air quality with particle counts and microbial colony counts)

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- ✓ Qualification
- ✓ Training
- ✓ Experience
- ✓ Responsibility
- ✓ Continuing education

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Quality Manager Supervisor

Active role in:

- ✓ Preparing, reviewing, approving and/or implementing QM policies and procedures in compliance with JACIE Standards
- ✓ Developing systems for auditing facility activities
- ✓ Defining the “**facility-defined time period**” for specific activities

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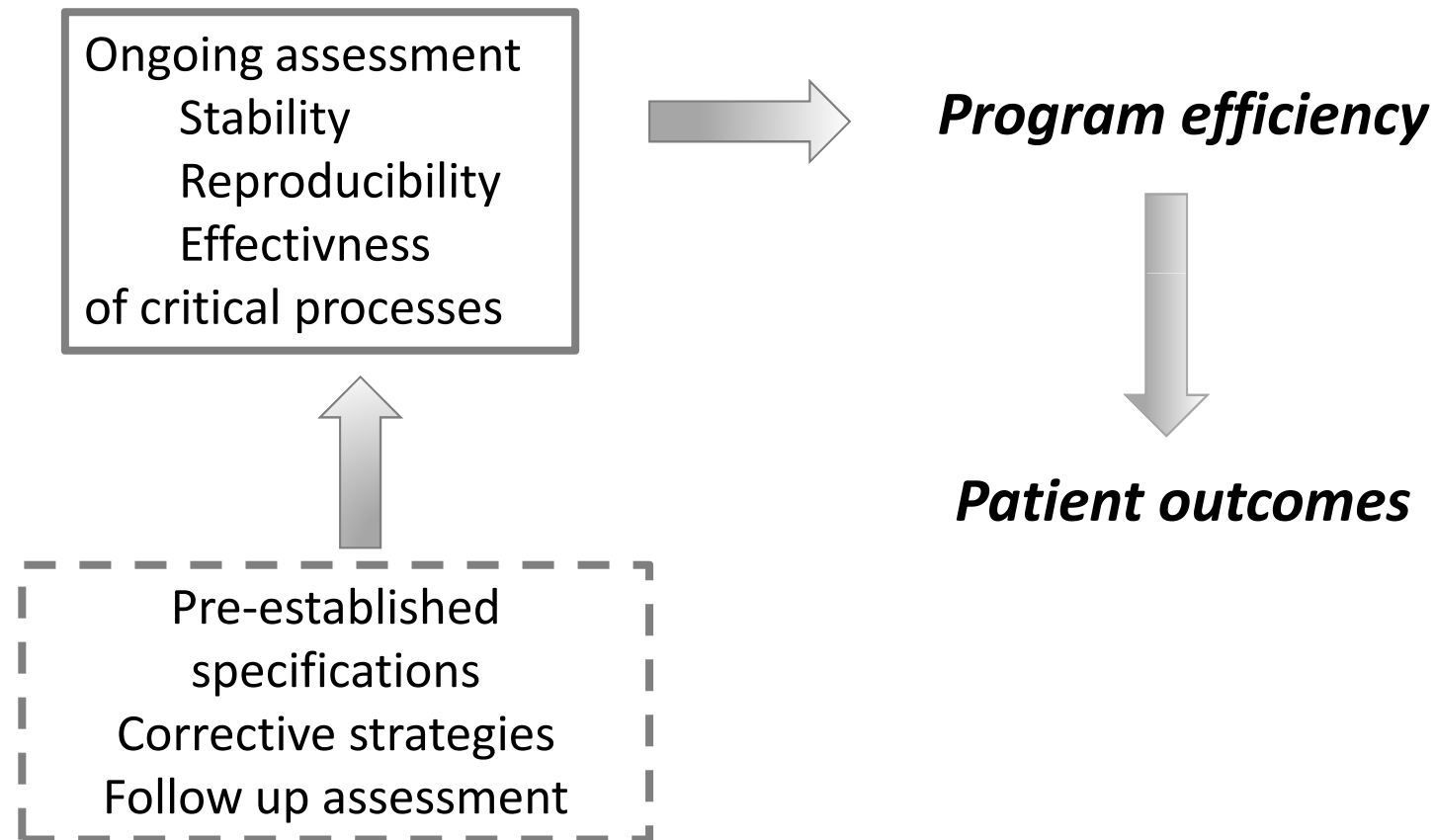
Quality Managment Plan



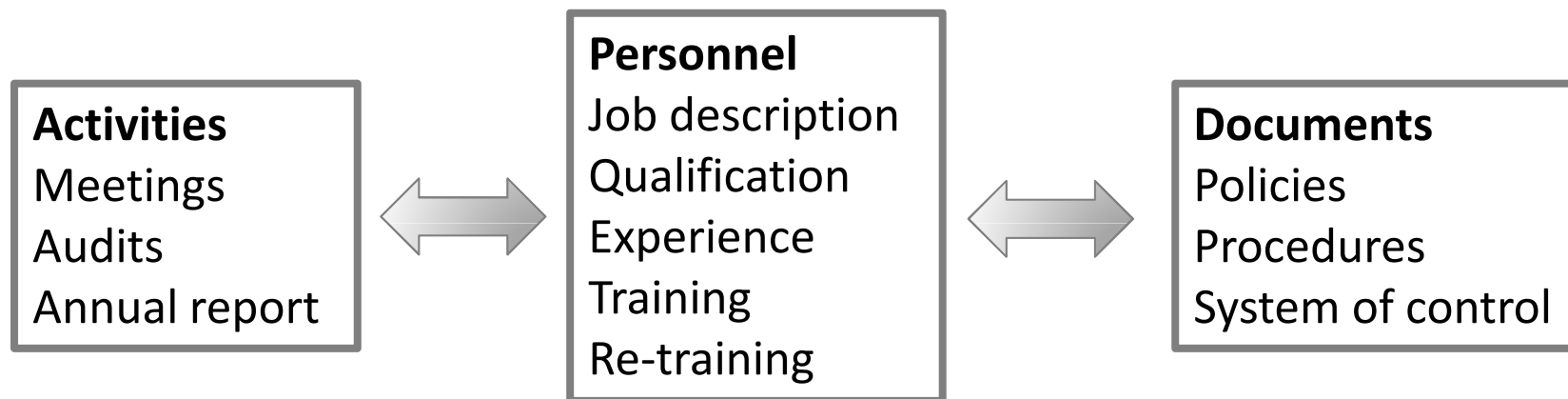
“.... The most challenging and time-consuming exercise that the Processing Facility will encounter when preparing for JACIE inspection....”!!

Purpose: *to define **WHO** (Organizational chart) and **HOW** (meetings, partecipants, schedule, documentation) works and interacts to implement the quality managment acitivities)*

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Process: a goal directed, interrelated series of actions, events or steps

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Efficacy and Outcome analysis

- ✓ Pre-established criteria for each CTP (*integrated approach!!!*)
- ✓ Collection
- ✓ Evaluation
- ✓ Distribution of patient outcome data
 - engraftment
 - adverse events/corrective action
- ✓ Documentation

Efficacy

CD34 cell dose (median/range)
Viability
Sterility



Outcome analysis

Engraftment (ANC/PLT)
Adverse events (Graft Failure;
adverse reaction during infusion)

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CTPs with positive microbial cultures

- ✓ Documentation and product labeling
- ✓ Product quarantine
- ✓ Release
(responsibility/criteria)
- ✓ Investigation of cause
- ✓ Notification
- ✓ Reporting to regulatory agencies
- ✓ Outcome analysis and preventive/corrective actions

NOTIFICA AL DIRETTORE DEL PROGRAMMA	
Si notifica che la seguente unità:	
Codice.....	Tipo di materiale.....
data di raccolta.....	
Donatore.....	
Ricevente.....	
Sono risultate:	
<input type="checkbox"/> positive per ricerca batteri aerobi, anaerobi e miceti positivi (vedi referto allegato)	
<input type="checkbox"/> non hanno raggiunto l'endpoint previsto:.....	
<input type="checkbox"/> scadenza prodotto :	
<input type="checkbox"/> Altro:.....	
Note:.....	
.....	
.....	
Notificato da:	Data / /
(timbro e firma)	Per accettazione
	(timbro e firma)
Il Direttore del Programma	

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CTPs with positive microbial cultures (II)

Review of

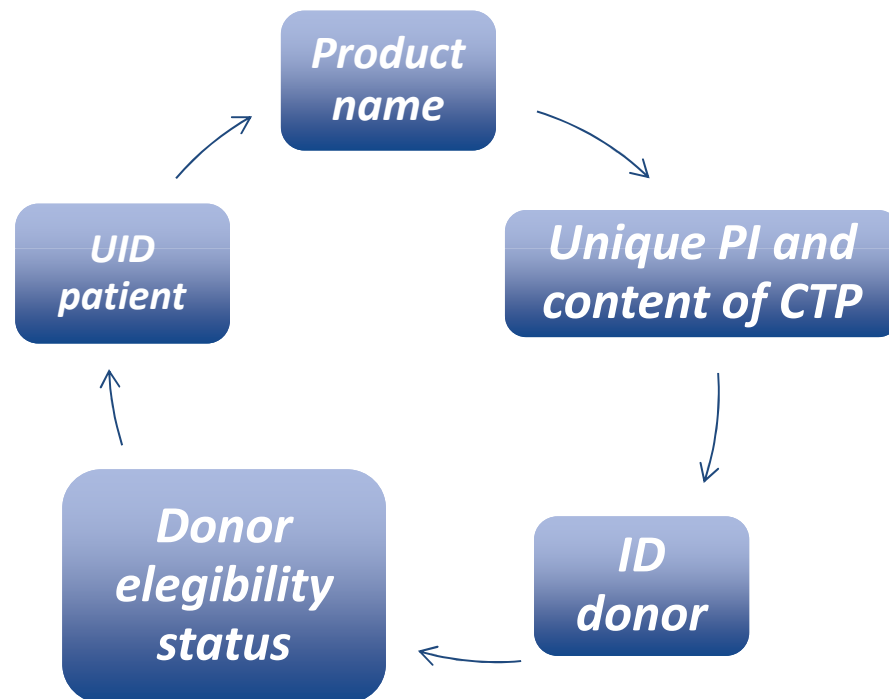
- ✓ Processing records
- ✓ Documentation of equipment cleaning (biological safety cabinet)
- ✓ Environmental conditions
- ✓ Staff competency

FASE	Data Firma Operatore	Indagine eseguita SI/NO	Esito P/N
Emocoltura paziente/donatore pre-aferesi			
Disinfezione cute Nursing CVC			
Emocoltura pre-manipolazione			
Emocoltura post-manipolazione			
Emocoltura allo scongelamento pre-infusione			
Etichetta Biohazard			
Quarantena			

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Tracking and tracing



- ✓ *Outcome information to other facilities*
- ✓ *Final disposition of CTP*

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Interruption of Processing Facility's operations

- ✓ Electronic record systems failure
- ✓ Drug shortage
- ✓ Power outages
- ✓ Equipment failure



To identify

- Personnel (key personnel to be involved)
- Documents (Policies, Procedures, worksheet etc)



To monitor

- Staff training
- Alternate systems

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Qualification of critical supplies, reagents , equipment and facilities

“ The establishment of confidence in equipment, supplies, and reagents function consistently with established limits”

- ✓ SOP
- ✓ Minimal standards for the acceptance
- ✓ Qualification of the manner in which they are used
- ✓ Control of vendors as regard to the provision according to applicable governmental laws and regulations and FACT-JACIE Standards



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Validation and/or verification of critical procedures

Validation: confirmation by examination and provision of objective evidence that particular requirements can be consistently fulfilled

Retrospective, concurrent or prospective

Verification: confirmation of the accuracy of something or that specified requirements have been fulfilled

Processing
Cryopreservation
Labeling
Storage
Distribution

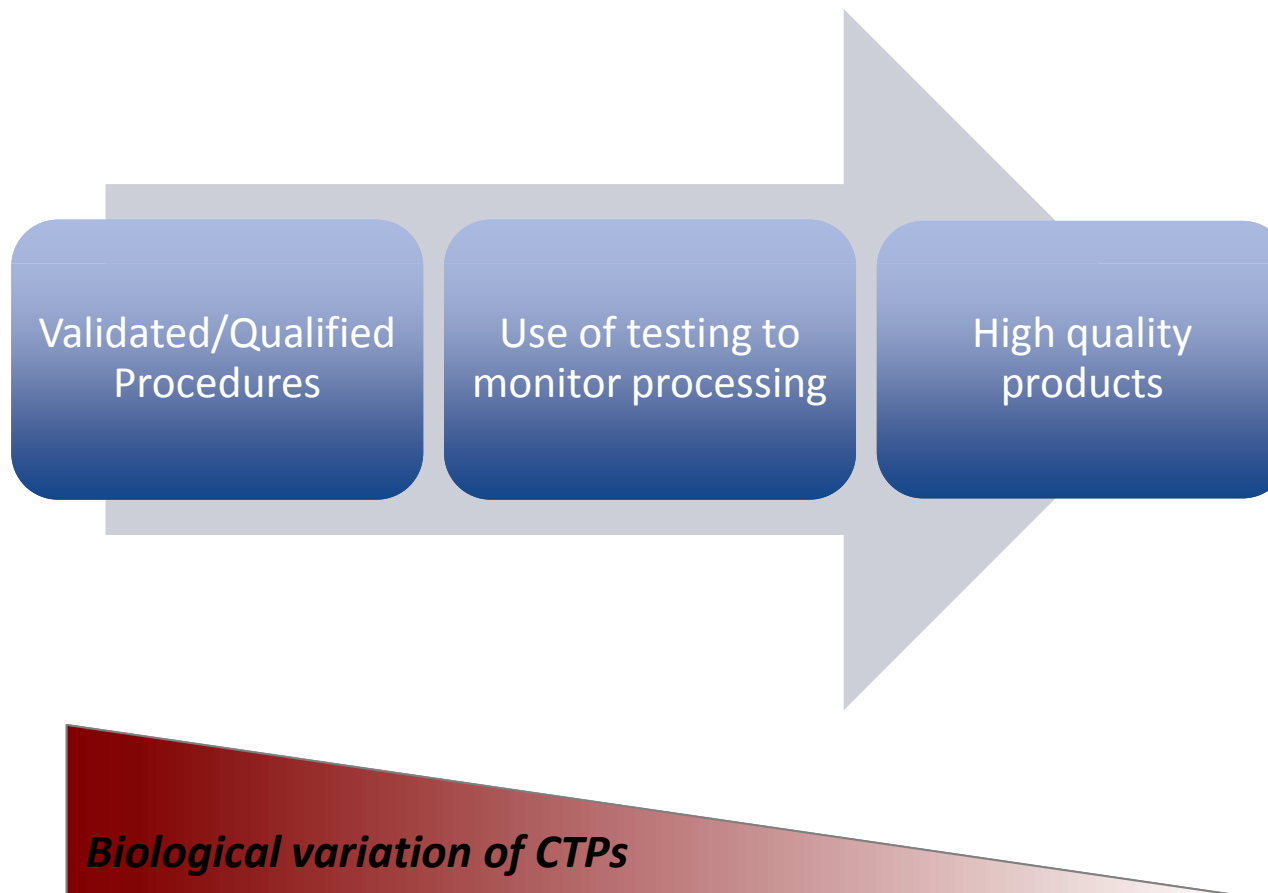
Equipments
Reagents
Supplies
Electronic record systems

Pre-established specifications
Format/Report
Validation studies:
 Analysis
 Review
 Acceptance
 Changes/Implementation

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Process Controls



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Process Controls

- ✓ Tests to ensure safety, viability and integrity of CTPs (***Release and exceptional release criteria***)
- ✓ Identification and handling of test samples (representative of CTP)
- ✓ Required validated assays and procedures for evaluation of CTP
 - TNC
 - Viability
 - CD34 testing (manipulation other than minimal)
 - Monitoring assays for target populations after enrichment or depletion
 - Post-processing microbial cultures
 - ABO/RH (allogeneic donors)
 - Communicable disease testing (specifically for cGTP facilities)

Standard V Edition: minimal tests required: TNC count and CTP viability (not specified when they are to be performed)

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Release/Exceptional Release **Expansion in the V Edition of Standards**

- ✓ Notification of the transplant physician of all nonconforming CTPS (*in the IV edition testing and screening results of inelegible products*) and documented approval for their release
- ✓ All products distributed from the Processing Facility are required to meet pre-determined criteria whether or not destined to the administration (*in the IV Edition: only those distributed for administration*)
- ✓ Quarantine for products with positive infection disease results and/or positive microbial cultures also with products with incomplete donor eligibility determination (*in the IV Edition*)

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Process Controls Cord Blood Administration

Shall:

- ✓ To communicate with registries and/or third parties regarding the manufacturer's instructions for preparation and administration and follow these to the extent possible
- ✓ To verify the processing procedure utilizing practice units similar to the CTP.
- ✓ Do not perform processing on a type of product (cord blood) for the first time on a unit intended for administration to a patient

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ISBT 128 CODING and LABELING

Developed and maintained by ICCBBA (www.iccbba.com) supported by CTCLAG (Ashford P et Al. *Transfusion* 2007; 47:1319-27 and . *Transfusion* 2007; 47: 1312-8)

Advantages

- ✓ Unique identification, coding and labeling of CTPs worldwide
- ✓ Standard for the transfer of informations
- ✓ Provides standard data structure for bar coding and electronic data interchange

IV Standard Edition: ISBT128 **terminology** mandatory

V Standard Edition: implementation plan of ISBT 128 **coding and labeling** mandatory

Pending decision by the EU on a European Coding System

Regulation of Bone Marrow Facilities?!

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Labeling Operations

- ✓ Finalized to prevent mislabeling or misidentification of CTP
- ✓ Approved/Validated “pre-printed” or “on-demand” labels
- ✓ Label version and labeling control system

Element ¹	Partial label	Label at completion of collection	Label at completion of processing	Label at distribution for administration ²
Unique numeric or alphanumeric identifier	AF	AF	AF	AF
Proper name of product ¹	AF	AF	AF	AF
Product modifiers ¹	AF		AF	AF
Product attributes (manipulations) ¹			AC	AC
Recipient name and identifier (if applicable)	AF	AT	AT	AT
Identity and address of collection facility or donor registry		AT	AC	AC
Date, time collection ends, and (if applicable) time zone		AT	AC	AC
Approximate volume		AT	AT	AT
Name and volume or concentration of anticoagulant and other additives		AT	AT	AT
Donor identifier and (if applicable) name		AT	AT	AT
Recommended storage temperature range		AT	AT	AT
Biohazard and/or Warning Labels (as applicable, see CM7.4, C7.4, D7.4).		AT	AT	AT
If applicable: Statement “NOT EVALUATED FOR INFECTIOUS SUBSTANCES”				
Statement “WARNING: Advise Patient of Communicable Disease Risks”		AT	AT	AT
Statement “WARNING: Reactive Test Results for [name of disease agent or disease]”		AT	AT	AT
Identity and address of processing and distribution facility(ies)			AC	AC
Statement “Do Not Irradiate”			AT	AT
Expiration Date (if applicable)			AT	AT
Expiration Time (if applicable)			AC	AT
ABO and Rh of donor (if applicable)			AC	AC
RBC compatibility testing results (if applicable)				AC
Statement “Properly Identify Intended Recipient and Product”				AT
Statement indicating that leukoreduction filters should not be used.				AT
Statement “FOR AUTOLOGOUS USE ONLY” (if applicable)		AT	AT	AT
Statement “For Use By Intended Recipient Only” (if for allogeneic recipient)				AT
Statement “For Nonclinical Use Only” (if applicable)				AT
Date of distribution				AC

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CTP Labels for shipping and transport on public roads

- ✓ Release and exceptional release criteria
- ✓ CTP integrity and safety
 - Temperature-controlled environment
 - Outer container (material, labeling)
- ✓ Method of transportation/shipping
 - Time
 - Qualified courier
 - Alternative means

Element	Inner container document	Outer container label
Date of distribution and time, if appropriate	AC	AF
Statement "Do Not X-Ray" and /or "Do Not Irradiate", if applicable	AC	AF
Statements "Human Cells for Administration" or equivalent and "Handle with Care"	AC	AF
Shipper handling instructions	AC	AF
Shipping facility name, street address, contact person, and phone number	AC	AF
Receiving facility name, street address, contact person, and phone number	AC	AF
Biohazard and/or Warning Labels (as applicable, see CM7.4, C7.4, D7.4).	AC	
If applicable: Statement "NOT EVALUATED FOR INFECTIOUS SUBSTANCES"	AC	
Statement "WARNING: Advise Patient of Communicable Disease Risks"	AC	
Statement "WARNING: Reactive Test Results for [name of disease agent or disease]"	AC	

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Accompanying Documents at Distribution

Documentation	Allogeneic Donors-Eligible	Allogeneic Donor-Ineligible ¹	Allogeneic Donor-Incomplete ¹	Autologous Donors ³
Statement that the donor has been determined to be either eligible or ineligible, based upon results of donor screening and testing	X	X		X (if positive)
Summary of records used to make the donor-eligibility determination ²	X	X		X (if positive)
Name and address of the establishment that made the donor-eligibility determination	X	X		X (if positive)
Listing and interpretation of the results of all communicable disease testing performed	X	X	X	X (if positive)
Statement that the communicable disease testing was performed by a laboratory meeting regulatory requirements ³	X	If applicable	If applicable	If applicable
Statement noting the reason(s) for the determination of ineligibility		X		If applicable
Statement that the donor-eligibility determination has not been completed			X	
Statement that the product must not be transplanted or infused until completion of the donor-eligibility determination, except under condition of urgent medical need			X	
Listing of any required screening or testing that has not yet been completed			X	
Results of donor screening that has been performed			X	
Documentation that the physician using the cellular therapy product was notified of incomplete testing or screening			X	
Instructions for product use to prevent the introduction, transmission, or spread of communicable diseases	X	X	X	X
Instructions for reporting serious adverse reactions or events to the distributing facility ⁴	X	X	X	X

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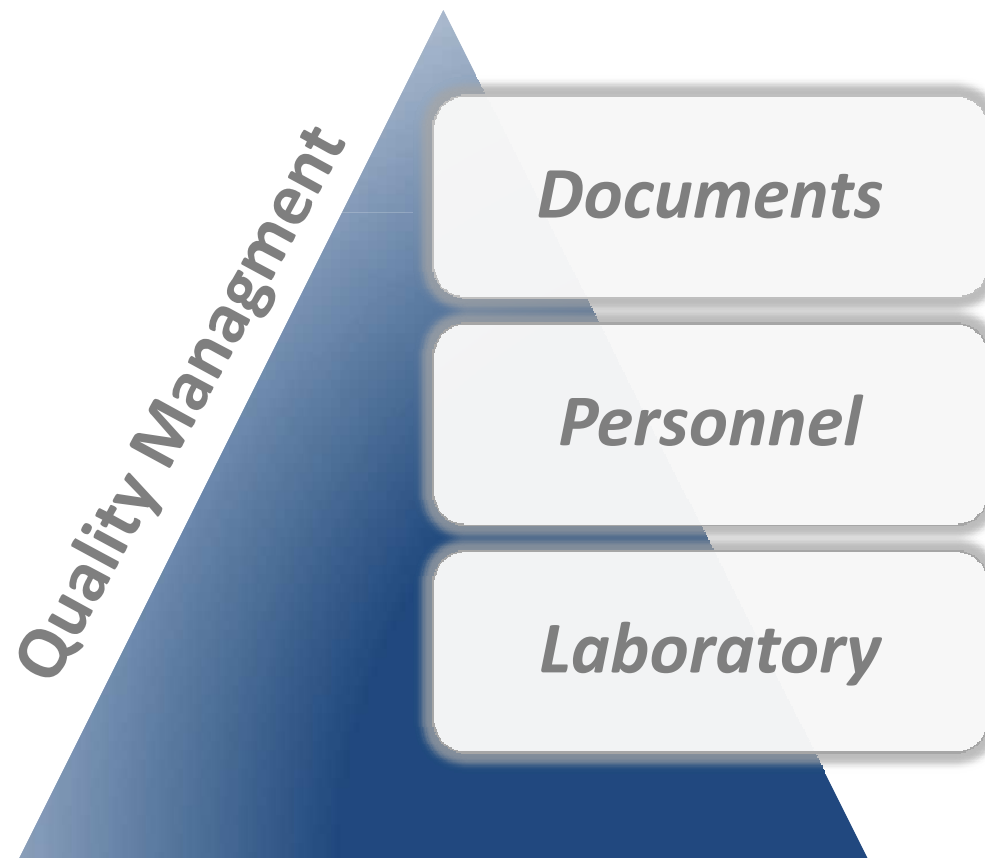
Storage/Disposal

- ✓ Clinical and Processing facilities agreement as regard to the duration and conditions of storage and indication of disposal
- ✓ Informed consent by donor/recipient to storage/disposal policy before CTP collection
 - Length of storage
 - Circumstances of CTP disposal (death of the recipient, no further need for CTPs, written agreements with donor registries)
 - Option to transfer CTP
- ✓ Documentation of recipient's death or no further need of CTP before product discarding
- ✓ Approval by PF Medical Director or recipient's physician for discard, other disposition and method of disposal

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Application/Accreditation



INTERNATIONAL STANDARDS FOR CELLULAR THERAPY PRODUCT COLLECTION, PROCESSING, AND ADMINISTRATION **ACCREDITATION MANUAL**



Standard B 1.2

The Clinical Program **shall** use cell collection and processing facilities that meet FACT-JACIE Standards with respect to their **interactions** with the Clinical Program