FDA U.S. FOOD & DRUG ADMINISTRATION
OFFICE OF REGULATORY AFFAIRS

August 9, 2018

Steven Saxe, R.Ph., FACHE
Executive Director
Washington State Pharmacy Quality Assurance Commission
PO Box 47852
Olympia, WA 98501

Dear Mr. Saxe:

The purpose of this letter is to refer to the Washington State Pharmacy Quality Assurance Commission for appropriate follow up, the U.S. Food and Drug Administration's (FDA) concerns about insanitary conditions observed during an FDA inspection at a pharmacy licensed by the Washington State Pharmacy Quality Assurance Commission, JD & SN Inc., dba Moses Lake Professional Pharmacy, located at 1555 Pilgrim St., Moses Lake, Washington 98837-4623 (Pharmacy license # PHAR.CF.00056175).

FDA inspected the firm from June 28, 2017, to July 12, 2017. Washington State Pharmacy Quality Assurance Commission was informed of the inspection, but did not accompany the FDA investigator during the inspection. A copy of a Form FDA 483 that documents our investigator's observations from the inspection can be found at https://www.fda.gov/downloads/AboutFDA/CentersOffices/OfficeofGlobalRegulatoryOperationsandPolicy/ORA/ORAElectronicReadingRoom/UCM575059.pdf, with any nonpublic information redacted. Because we consider this inspection to be "closed" under 21 CFR 20.64(d)(3), you may request a copy of the Establishment Inspection Report (EIR) that FDA will provide to the firm, which contains additional information about our inspection. If you are a Commissioned Official or if your state agency has entered into a 21 CFR 20.88 information sharing agreement, you may be able to receive a copy of the Form FDA 483 or the EIR that includes certain nonpublic information. Alternatively, you may also choose to request a copy of the EIR directly from the firm.

During the inspection, the FDA investigator reviewed a small sample of records for products compounded by JD & SN Inc., dba Moses Lake Professional Pharmacy and determined, based on this sample, that this firm appears to obtain valid prescriptions for individually-identified patients for the drug products that it compounds and distributes.

During the inspection, the FDA investigator observed deviations from appropriate practice standards that, if not corrected, could lead to contamination of drugs, potentially putting patients at risk. Specifically, the firm produced hazardous drug products without providing adequate containment, segregation, and cleaning of work surfaces and utensils to prevent cross-contamination.

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JD & SN Inc., dba Moses Lake Professional Pharmacy committed to FDA in its responses dated July 19, 2017, and October 13, 2017, to correct the deviations in the Form FDA 483 and provided documentation in support of those corrective actions. In addition, the deviations identified appear to be readily correctable.

After review of the record, FDA does not intend to take further action at this time with regard to the findings of this inspection. This firm apparently obtains prescriptions for identified individual patients before distributing its compounded drugs, as required by section 503A(a) of the Federal Food, Drug and Cosmetic Act, and FDA believes that the corrective actions can be appropriately overseen by the State. Therefore, FDA is referring this matter to the Washington State Pharmacy Quality Assurance Commission for follow up to ensure appropriate corrective action is taken. Please notify us if you become aware of any adverse events or product quality concerns associated with drugs made at this facility, or if you observe any practices at this facility that concern you or that could be violations of Federal law.

We look forward to continuing to work with you on the oversight of compounding pharmacies. If you have additional questions, please contact William V. Millar, Compliance Officer, at (510) 337-6896, or by email at william.millar@fda.hhs.gov.

Sincerely,

Katherine E. Jacobitz -S

Digitally signed by Katherine E. Jacobitz -S
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CAPT Katherine Jacobitz
Acting Director, Division of Pharmaceutical Quality Operations IV

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CMS WA 165827

Cc: Shawn W. Needham, R.Ph., President
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