U.S. Food and Drug Administration
Division of Pharmaceutical Quality Operations III
300 River Place, Suite 5900
Detroit, MI 48207
Telephone: (313) 393-8100
Fax: (313) 393-8139
www.fda.gov

April 29, 2019

UPS NEXT DAY
SIGNATURE REQUIRED

Stacey Jassey
President
Minnesota State Board of Pharmacy
2829 University Avenue SE
Minneapolis, MN 55414-2842

Dear Ms. Jassey:

The purpose of this letter is to refer to the Minnesota State Board of Pharmacy (BOP) for appropriate follow up, the U.S. Food and Drug Administration's (FDA) concerns about poor sterile practices observed during an FDA inspection at a pharmacy licensed by the Minnesota BOP, Fairview Compounding Pharmacy, located at 711 Kasota Ave SE, Minneapolis, MN 55414-2842. (Community/Outpatient, Nonsterile Product Compounding, and Sterile Product Compounding (#262526; expires 6/30/19).

FDA inspected the firm from April 2, 2018, to April 18, 2018. FDA investigators were accompanied by Minnesota State investigators for 5 days. A copy of a Form FDA 483 that documents our investigators' observations from the inspection can be found at https://www.fda.gov/ucm/groups/fdagov-public/@fdagov-afda-orgs/documents/document/ucm606081.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 investigators reviewed a small sample of records for products compounded by Fairview Compounding 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. In the response to the Form FDA 483, received on May 8, 2018, the firm advised FDA that it prepares "compounded preparations for identified patients upon receipt of a patient-specific prescription order, and prepares some compound preparations in anticipation of the receipt of a patient-specific prescription."

During the inspection, the FDA investigators observed deviations from appropriate sterile practice standards that, if not corrected, could lead to contamination of drugs, potentially putting patients at risk. Examples of deviations observed during our inspection include:

1. Non-sterilized and non-depyrogenated equipment were used in sterile production.
2. The frequency of sporicidal disinfection in the classified aseptic processing areas was inadequate.
3. Personnel did not disinfect and change gloves frequently enough to prevent contamination.
4. Non-sterile wipes were used in the ISO 5 area.
5. Biological indicators were not used to verify the adequacy of the sterilization cycle.
6. ISO 5 classified areas were not certified under dynamic conditions.

Fairview Compounding Pharmacy committed to FDA in its responses dated May 8, 2018, and September 26, 2018, 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 Minnesota State BOP 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 human or animal 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 Tina Pawlowski, Compliance Officer, at (313) 393-8217, or by email at Tina.Pawlowski@fda.hhs.gov.

Sincerely,

Nicholas F. Lyons -S

Digitally signed by Nicholas F. Lyons -S
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Date: 2019.04.29 14:59:51 -05'00'

On behalf of,
Art O. Czabaniuk
Program Division Director
Division of Pharmaceutical Quality Operations III

Cc: Robert W. Beacher
President
Fairview Pharmacy Services
711 Kasota Avenue SE
Minneapolis, MN 55414-2842