

Biological Product Deviation Reporting and HCT/P Deviation Reporting - Deviation Codes

[Blood BPD Codes](#) | [Licensed Non-Blood BPD Codes](#) | [HCT/P Deviation Codes](#)

Blood BPD Codes:

Use the following list of Biological Product Deviation (BPD) Codes to assign a specific code to a reportable event when you submit the report to FDA. Use the guidance document, "[Biological Product Deviation Reporting for Blood and Plasma Establishments](#)," to determine if you must report an event. The list includes deviations from regulations, standards, and established specifications that may affect the safety, purity, or potency of a product. The use of BPD Codes will assist the FDA in analyzing the data submitted and streamline the trend analysis.

Use one of the following BPD Codes to report an event that was recognized by a staff member who determined, *prior to distribution*, that the event has the potential to affect the safety, purity, or potency of the distributed product and that the product was either not quarantined or inappropriately released from quarantine.

QC-94-** Distribution of product that did not meet specifications

QC-94-12 Product identified as unsuitable due to a collection deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product}*

QC-94-13 Product identified as unsuitable due to a component preparation deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product}*

QC-94-14 Product identified as unsuitable due to a labeling deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product}*

QC-94-15 Product identified as unsuitable due to a donor screening deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product}*

QC-94-16 Product identified as unsuitable due to a donor deferral deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product}*

QC-94-17 Product identified as unsuitable due to a shipping or storage deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product}*

QC-94-18 Product identified as unsuitable due to a transfusion-transmitted infection testing deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product}*

If you are a transfusion service only, the deviation codes you should select from are Component Preparation (CP), Routine Testing (RT), Labeling (LA), Quality Control and Distribution (QC).

1. Revisions to Blood BPD Reporting Codes for FY2023

For FY2023, we modified codes to clarify specific events that are reportable. We deleted codes for events in which reporting is no longer required.

2. Summary of FY2023 Revisions

An overview of the changes that were made to the BPD codes for FY2023 is provided below. Refer to each section below for the complete list of BPD codes.

A. The following codes have been deleted:

- DS-28-** Deferral screening not done or incorrectly performed, including incorrect ID used during search, prior deferral due to history

- DS-28-42 Risk factors associated with Creutzfeldt-Jakob Disease - travel
- DS-29-** Donor gave history which warranted deferral or follow up and was not deferred or follow up questions were not asked
 - DS-29-42 Risk factors associated with Creutzfeldt-Jakob Disease - travel
- DD-32-** Donor missing, incorrectly deleted, or incorrectly identified on deferral list, donor was or should have been previously deferred due to history
 - DD- 32-42 Risk factors associated with Creutzfeldt-Jakob Disease - travel
- QC-91-** Failure to quarantine unit due to medical history
 - QC-91-42 Risk factors associated with Creutzfeldt-Jakob Disease - travel

B. The following BPD codes have been modified:

- DS-28-** Deferral screening not done or incorrectly performed, including incorrect ID used during search, prior deferral due to history
 - DS-28-40 Risk factors associated with Creutzfeldt-Jakob Disease - received human cadaveric (allogeneic) dura mater transplant
 - DS-28-41 Risk factors associated with Creutzfeldt-Jakob Disease - family history (blood relative diagnosed with familial prion disease (e.g., fCJD, GSS, or FFI))
- DS-29-** Donor gave history which warranted deferral or follow up and was not deferred or follow up questions were not asked
 - DS-29-40 Risk factors associated with Creutzfeldt-Jakob Disease - received human cadaveric (allogeneic) dura mater transplant
 - DS-29-41 Risk factors associated with Creutzfeldt-Jakob Disease - family history (blood relative diagnosed with familial prion disease (e.g., fCJD, GSS, or FFI))
- DD-32-** Donor missing, incorrectly deleted, or incorrectly identified on deferral list, donor was or should have been previously deferred due to history
 - DD-32-40 Risk factors associated with Creutzfeldt-Jakob Disease - received human cadaveric (allogeneic) dura mater transplant
 - DD-32-41 Risk factors associated with Creutzfeldt-Jakob Disease - family history (blood relative diagnosed with familial prion disease (e.g., fCJD, GSS, or FFI))
- QC-91-** Failure to quarantine unit due to medical history
 - QC-91-40 Risk factors associated with Creutzfeldt-Jakob Disease - received human cadaveric (allogeneic) dura mater transplant
 - QC-91-41 Risk factors associated with Creutzfeldt-Jakob Disease - family history (blood relative diagnosed with familial prion disease (e.g., fCJD, GSS, or FFI))

C. The information within the parenthesis for the following BPD code has been modified to clarify reportable events:

- QC-96-07 Product shipped at incorrect temperature *{includes shipment with incorrect or missing coolant, e.g., no ice in RBC shipment; **number of units did not meet validated container}**}*

3. Blood BPD Reporting Codes

Please use the appropriate code(s) from the listing below to report a deviation or unexpected event that occurred in a blood or plasma establishment.

Changes made on October 1, 2022 (the beginning of FY2023) are identified with a dagger (†).

The changes to the deviation codes for FY2023 are listed below.

The following list is a summary of abbreviations used to identify each category of Blood BPD codes:

Donor Eligibility

DS - Donor Screening

DD - Donor Deferral

BC - Blood Collection

CP - Component Preparation

Laboratory Testing

VT - Transfusion-Transmitted Infection Testing

RT - Routine Testing

LA - Labeling

QC - Quality Control and Distribution

DS/DD DONOR ELIGIBILITY

DS--** DONOR SCREENING**

DS-20-**-** Miscellaneous

DS-20-01 Other

DS-21-**-** Donor did not meet eligibility criteria

DS-21-01 Other

DS-21-02 Hemoglobin or Hematocrit unacceptable, not documented, or testing performed incorrectly *{includes use of expired reagents for hemoglobin or hematocrit}*

DS-21-03 Temperature unacceptable or not documented

DS-21-04 Medical history interview or physical assessment not performed or inadequate

DS-21-05 Platelet count, no documented platelet count for product

DS-22-**-** Donor record incomplete or incorrect

DS-22-01 Other *{includes missing donor records}*

DS-22-02 Donor identification *{includes donor using false identification, e.g., twins}*

DS-22-03 Donor history questions *{includes response to educational material/AIDS questions not documented; incorrect gender specific question asked; donor comprehension questionable}*

DS-22-04 Arm inspection

DS-26-**-** Deferral screening not done or incorrectly performed, including incorrect ID used during search

DS-26-01 Donor not previously deferred *{use DS2601 when the deferral file is not searched or searched using incorrect donor identification information, or the deferral file was incorrectly searched, and the donor was not previously deferred}*

DS-27-**-** Deferral screening not done or incorrectly performed, including incorrect ID used during search, prior deferral due to testing for: *{use DS27** when the deferral file is not searched or searched using incorrect donor identification information, or the deferral file was incorrectly searched, and the donor was previously deferred due to testing}*

DS-27-01 Other

DS-27-02 HIV

DS-27-03 HBV

DS-27-04 Anti-HBc

DS-27-05 HCV

DS-27-06 Anti-HTLV

DS-27-08 Syphilis

DS-27-10 West Nile Virus

DS-27-11 T. Cruzi (Chagas)

DS-27-12 Babesia

DS-28-** Deferral screening not done or incorrectly performed, including incorrect ID used during search, prior deferral due to history *{use DS28** when the deferral file is not searched or searched using incorrect donor identification information, or the deferral file was incorrectly searched, and the donor was previously deferred due to history}*

DS-28-01 Other *{includes type of behavior or history unknown or not specified; unacceptable address; donor unreliable, for example mental status questionable}*

DS-28-02 History of hepatitis, not specified

DS-28-03 History of jaundice

DS-28-04 History of Hepatitis B

DS-28-05 History of Hepatitis C

DS-28-06 History of syphilis

DS-28-07 Intimate contact with risk for a relevant transfusion-transmitted infection - syphilis

DS-28-13 Non-specific intimate contact with risk for a relevant transfusion-transmitted infection *{includes contact with an individual who was deferred by another center, on a national deferral list, or tested reactive for an unknown viral marker}*

DS-28-14 Male donor had sex with another man

DS-28-15 Female had sex with a man who had sex with another man

DS-28-16 IV drug use not prescribed by a doctor *{includes taking illegal drugs by needle, e.g., IM}*

DS-28-17 Sex partner used IV drugs not prescribed by a doctor

DS-28-22 Exchanged sex for drugs or money

DS-28-23 Sex partner exchanged sex for drugs or money

DS-28-28 Donor received transfusion

DS-28-29 Donor received xenotransplantation product (specify product) *{does not include human tissue}*

DS-28-36 Travel to or residence in a malaria endemic area/history of malaria

DS-28-37 History of disease *{donor was aware of condition or disease prior to donation; does not include diseases that do not affect the safety, purity, or potency of the product e.g., heart disease, hemochromatosis, autoimmune disorders, such as Rheumatoid Arthritis, Lupus}*

†DS-28-40 Risk factors associated with Creutzfeldt-Jakob Disease - received human cadaveric (allogeneic) dura mater transplant

†DS-28-41 Risk factors associated with Creutzfeldt-Jakob Disease - family history (blood relative diagnosed with familial prion disease {e.g., fCJD, GSS, or FFI})

DS-28-44 Received cadaveric pituitary growth hormone

DS-28-45 Received finasteride, etretinate, isotretinoin, dutasteride (specify medication) *{e.g., Proscar, Propecia, Tegison, Accutane, Avodart, Jalyn, or Absorica}*

DS-28-46 Received antibiotics or medication which may adversely affect the product (specify medication) *{e.g., platelet inhibitor drugs; drugs with teratogenic effect; does not include anticoagulant therapy}*

DS-28-47 Received vaccine or immune globulin

DS-28-48 Exposure to a disease

DS-28-49 Incarcerated

DS-28-53 Multiple high-risk behaviors/contacts

DS-28-55 Donor deferred by another center due to history or tested reactive, specific history or testing unknown *{reason for deferral unknown or not provided by the other center – use more specific DS code if reason known}*

DS-28-58 Risk factor associated with Chagas *{includes tested reactive prior to donation}*

DS-28-59 Donor received tattoo and/or piercing *{includes tattoo, any type of piercing or a combination of tattoo and/or piercing and any other type of potential blood exposure}*

DS-28-60 Donor was exposed to blood or body fluids other than tattoo or piercing *{includes accidental needlestick, animal bite; human bite; occupational exposure; scarification; branding; exposure not specified; multiple exposures, not including tattoo or piercing}*

DS-28-61 Intimate contact with risk for a relevant transfusion-transmitted infection - HIV

DS-28-62 Intimate contact with risk for a relevant transfusion-transmitted infection - HTLV

DS-28-63 Intimate contact with risk for a relevant transfusion-transmitted infection - HBV

DS-28-64 Intimate contact with risk for a relevant transfusion-transmitted infection - HCV
DS-28-65 Intimate contact with risk for a relevant transfusion-transmitted infection - hepatitis, not specified
DS-28-66 Intimate contact with risk for a relevant transfusion-transmitted infection – Other

DS-29-** Donor gave history which warranted deferral or follow up and was not deferred or follow up questions were not asked *{use DS29** when a donor gives disqualifying information during the screening process and was not appropriately deferred or provides some information that requires further questioning to determine donor eligibility and follow up questioning was not done}*

DS-29-01 Other *{includes type of behavior or history unknown or not specified; donor unreliable, for example mental status questionable; unacceptable address}*

DS-29-02 History of hepatitis, not specified, or tested reactive prior to donation

DS-29-03 History of jaundice

DS-29-04 History of Hepatitis B, or tested reactive prior to donation

DS-29-05 History of Hepatitis C, or tested reactive prior to donation

DS-29-06 History of syphilis, or tested reactive prior to donation

DS-29-07 Intimate contact with risk for a relevant transfusion-transmitted infection - syphilis

DS-29-13 Non-specific intimate contact with risk for a relevant transfusion-transmitted infection *{includes contact with an individual who was deferred by another center, on a national deferral list, or tested reactive for an unknown viral marker}*

DS-29-14 Male donor had sex with another man

DS-29-15 Female had sex with a man who had sex with another man

DS-29-16 IV drug use not prescribed by a doctor *{includes taking illegal drugs by needle, e.g., IM}*

DS-29-17 Sex partner used IV drugs not prescribed by a doctor

DS-29-22 Exchanged sex for drugs or money

DS-29-23 Sex partner exchanged sex for drugs or money

DS-29-28 Donor received transfusion

DS-29-29 Donor received xenotransplantation product (specify product) *{does not include human tissue products}*

DS-29-36 Travel to or resided in a malaria endemic area/history of malaria

DS-29-37 History of disease *{donor was aware of condition or disease prior to donation; does not include diseases that do not affect the safety, purity, or potency of the product e.g., heart disease, hemochromatosis, autoimmune disorders, such as Rheumatoid Arthritis, Lupus}*

†DS-29-40 Risk factors associated with Creutzfeldt-Jakob Disease - received human cadaveric (allogeneic) dura mater transplant

†DS-29-41 Risk factors associated with Creutzfeldt-Jakob Disease - family history (blood relative diagnosed with familial prion disease {e.g., fCJD, GSS, or FFI})

DS-29-44 Received cadaveric pituitary growth hormone

DS-29-45 Received finasteride, etretinate, isotretinoin, dutasteride (specify medication) *{e.g., Proscar, Propecia, Tegison, Accutane, Avodart, Jalyn, or Absorica}*

DS-29-46 Received antibiotics or medication which may adversely affect the product (specify medication) *{e.g., platelet inhibitor drugs; drugs with teratogenic effect; does not include anticoagulant therapy}*

DS-29-47 Received vaccine or immune globulin

DS-29-48 Exposure to a disease

DS-29-49 Incarcerated

DS-29-53 Multiple high-risk behaviors/contacts

DS-29-55 Donor deferred by another center due to history or tested reactive, specific history or testing unknown *{reason for deferral unknown or not provided by the other center – use more specific DS code if reason known}*

DS-29-58 Risk factor associated with Chagas *{includes tested reactive prior to donation}*

DS-29-59 Donor received tattoo and/or piercing *{includes tattoo, any type of piercing or a combination of tattoo and/or piercing and any other type of potential blood exposure}*

DS-29-60 Donor was exposed to blood or body fluids other than tattoo or piercing *{includes accidental needlestick, animal bite; human bite; occupational exposure; scarification; branding; exposure not specified; multiple exposures, not including tattoo or piercing}*

- DS-29-61 Intimate contact with risk for a relevant transfusion-transmitted infection - HIV
- DS-29-62 Intimate contact with risk for a relevant transfusion-transmitted infection – HTLV
- DS-29-63 Intimate contact with risk for a relevant transfusion-transmitted infection - HBV
- DS-29-64 Intimate contact with risk for a relevant transfusion-transmitted infection - HCV
- DS-29-65 Intimate contact with risk for a relevant transfusion-transmitted infection - hepatitis, not specified
- DS-29-66 Intimate contact with risk for a relevant transfusion-transmitted infection – Other

DD--** DONOR DEFERRAL**

DD-30-**-** Miscellaneous

DD-30-01 Other

DD-31-**-** Donor missing, incorrectly deleted, or incorrectly identified on deferral list, donor was or should have been previously deferred due to testing for *{use DD31** if the donor should have been deferred due to testing at a previous donation and was either not on the deferral list or incorrectly identified on the deferral list, e.g. listed as temporary deferral instead of permanent deferral; also, includes if the donor was not reentered appropriately}*

- DD-31-01 Other
- DD-31-02 HIV
- DD-31-03 HBV
- DD-31-04 Anti-HBc
- DD-31-05 HCV
- DD-31-06 Anti-HTLV
- DD-31-08 Syphilis
- DD-31-10 West Nile Virus
- DD-31-11 T. Cruzi (Chagas)
- DD-31-12 Babesia

DD-32-**-** Donor missing, incorrectly deleted, or incorrectly identified on deferral list, donor was or should have been previously deferred due to history *{use DD32** if the donor should have been deferred due to history at a previous donation and was either not on the deferral list or incorrectly identified on the deferral list, e.g., listed as temporary deferral instead of permanent deferral; also, includes if the donor was not reentered appropriately}*

- DD-32-01 Other *{includes type of behavior or history unknown or not specified; unacceptable address; donor unreliable, for example mental status questionable}*
- DD-32-02 History of hepatitis, not specified
- DD-32-03 History of jaundice
- DD-32-04 History of Hepatitis B
- DD-32-05 History of Hepatitis C
- DD-32-06 History of syphilis
- DD-32-07 Intimate contact with risk for a relevant transfusion-transmitted infection - syphilis
- DD-32-13 Non-specific intimate contact with risk for a relevant transfusion-transmitted infection *{includes contact with an individual who was deferred by another center, on a national deferral list, or tested reactive for an unknown viral marker}*
- DD-32-14 Male donor had sex with another man
- DD-32-15 Female had sex with a man who had sex with another man
- DD-32-16 IV drug use not prescribed by a doctor *{includes taking illegal drugs by needle, e.g., IM}*
- DD-32-17 Sex partner used IV drugs not prescribed by a doctor
- DD-32-22 Exchanged sex for drugs or money
- DD-32-23 Sex partner exchanged sex for drugs or money
- DD-32-28 Donor received transfusion
- DD-32-29 Donor received xenotransplantation product (specify product) *{does not include human tissue products}*
- DD-32-36 Travel to or residence in a malaria endemic area/history of malaria

DD-32-37 History of disease *{donor was aware of condition or disease **prior** to donation; does not include diseases that do not affect the safety, purity, or potency of the product e.g., heart disease, hemochromatosis, autoimmune disorders, such as Rheumatoid Arthritis, Lupus}*

†DD-32-40 Risk factors associated with Creutzfeldt-Jakob Disease - received human cadaveric (allogeneic) dura mater transplant

†DD-32-41 Risk factors associated with Creutzfeldt-Jakob Disease - family history (blood relative diagnosed with familial prion disease {e.g., fCJD, GSS, or FFI})

DD-32-44 Received cadaveric pituitary growth hormone

DD-32-45 Received finasteride, etretinate, isotretinoin, dutasteride (specify medication) *{e.g., Proscar, Propecia, Tegison, Accutane, Avodart, Jalyn, or Absorica}*

DD-32-46 Received antibiotics or medication which may adversely affect the product (specify medication) *{e.g., platelet inhibitor drugs; drugs with teratogenic effect; does not include anticoagulant therapy}*

DD-32-47 Received vaccine or immune globulin

DD-32-48 Exposure to a disease

DD-32-49 Incarcerated

DD-32-53 Multiple high-risk behaviors/contacts

DD-32-55 Donor deferred by another center due to history or tested reactive, specific history or testing unknown *{reason for deferral unknown or not provided by the other center – use more specific DD code if reason known}*

DD-32-58 Risk factor associated with Chagas *{includes tested reactive prior to donation}*

DD-32-59 Donor received tattoo and/or piercing *{includes tattoo, any type of piercing or a combination of tattoo and/or piercing and any other type of potential blood exposure}*

DD-32-60 Donor was exposed to blood or body fluids other than tattoo or piercing *{includes accidental needlestick, animal bite; human bite; occupational exposure; scarification; branding; exposure not specified; multiple exposures, not including tattoo or piercing}*

DD-32-61 Intimate contact with risk for a relevant transfusion-transmitted infection - HIV

DD-32-62 Intimate contact with risk for a relevant transfusion-transmitted infection - HTLV

DD-32-63 Intimate contact with risk for a relevant transfusion-transmitted infection - HBV

DD-32-64 Intimate contact with risk for a relevant transfusion-transmitted infection - HCV

DD-32-65 Intimate contact with risk for a relevant transfusion-transmitted infection - hepatitis, not specified

DD-32-66 Intimate contact with risk for a relevant transfusion-transmitted infection – Other

BC--** BLOOD COLLECTION**

BC-40-**-** Miscellaneous

BC-40-01 Other

BC-41-**-** Sterility compromised

BC-41-01 Other

BC-41-02 Bacterial contamination (identify organism if possible) *{use BC4102 if contamination is discovered as a result of a patient transfusion reaction; if contamination was found during Bacterial Detection Testing, use QC9216}*

BC-41-03 Air contamination *{includes system open during collection process, e.g., during sample collection}*

BC-41-04 Arm prep not performed or performed inappropriately *{includes the use of incorrect arm preparation supplies; supplies not maintained appropriately, e.g., stored at unacceptable temperature}*

BC-42-**-** Collection bag

BC-42-01 Other

BC-42-02 Blood drawn into outdated bag

BC-42-03 Incorrect anticoagulant

BC-42-04 Outdated anticoagulant

BC-42-05 Potential collection set (bag, tubing) defect (e.g., product leaking) *{use BC4205 if event not related to component preparation}*

BC-42-06 Incorrect collection bag used (e.g., 500 ml bag instead of 450ml bag)

BC-43-** Collection process

BC-43-01 Other *{includes use of incorrect collection supplies; use of supplies that were not maintained appropriately; product contained clots and was hemolyzed which was not discovered prior to distribution}*

BC-43-03 Overweight collection (anticoagulant ratio unacceptable); not discovered prior to component preparation

BC-43-05 Product contained clots or fibrin, not discovered prior to distribution *{includes clots discovered by consignee upon receipt of product or during transfusion}*

BC-43-06 Product hemolyzed, not discovered prior to distribution *{reporting is not required if hemolyzed product discovered after consignee accepted it into their inventory}*

BC-43-08 Donor sample tube mix-up or donor sample tube mislabeled

BC-43-09 Apheresis collection process

BC-44-** Apheresis collection device

BC-44-01 Other *{includes collection kits not used within acceptable time period (or not documented) after loading or priming}*

BC-44-02 Device defect

BC-44-03 Softgoods defect (bags, tubing, etc.)

CP--** COMPONENT PREPARATION**

CP-50-** Miscellaneous

CP-50-01 Other

CP-51-** Sterility compromised

CP-51-01 Other

CP-51-03 Air contamination

CP-51-04 Product integrity compromised during component preparation (e.g., leaking at sterile connection site)

CP-52-** Component not prepared in accordance with specifications

CP-52-01 Other *{includes insufficient or excessive plasma volume}*

CP-52-02 Platelets made from Whole Blood collected from donor who took medication that may affect platelet function

CP-52-04 Platelets not agitated

CP-52-05 Platelet count or platelet yield not acceptable as a result of a component preparation deviation or unexpected event *{includes platelet count too high to store in one bag or platelet count too low to store in multiple bags}*

CP-52-06 Product processed at incorrect centrifuge setting

CP-52-07 Product not frozen within the appropriate time frame or freezing time not documented

CP-52-08 Product prepared at incorrect temperature or held at incorrect temperature during component preparation

CP-52-09 Washing/deglycerolization not performed in accordance with specifications *{includes expired saline or incorrect wash solution used}*

CP-52-10 Leukoreduction not performed in accordance with specifications *{includes time component returned to controlled temperature not documented or discrepant; product not leukoreduced within allowable time frame; filtration process incomplete or performed incorrectly}*

CP-52-11 Irradiation not performed in accordance with specifications *{includes time component returned to controlled temperature not documented or discrepant; documentation of irradiation process incomplete; product irradiated more than once; irradiation process incomplete or inadequate}*

CP-52-12 Components not prepared within appropriate time frame after collection

CP-52-13 Additive solution not added, added incorrectly, or added to incorrect product or expired additive solution added

CP-52-14 Thawing frozen product not performed in accordance with specifications

CP-52-15 Pooling not performed in accordance with specifications *{includes incorrect number of units pooled}*
CP-52-16 Aliquot preparation not performed in accordance with specifications
CP-52-17 Sterile docking procedure not performed in accordance with specifications *{includes incorrect, missing, or discrepant documentation of weld inspection}*
CP-52-18 Pathogen reduction not performed in accordance with specifications

CP-53-** Component prepared from a unit that was
CP-53-01 Other
CP-53-02 Overweight
CP-53-03 Underweight
CP-53-04 Stored at unacceptable or undocumented temperature

CP-54-** Component manufactured that was
CP-54-01 Other
CP-54-02 Overweight
CP-54-03 Underweight
CP-54-04 Lipemic
CP-54-05 Bloody

VT/RT LABORATORY TESTING

VT--** TRANSFUSION-TRANSMITTED INFECTION TESTING**

VT-70-** Miscellaneous
VT-70-01 Other

VT-71-** Testing performed, interpreted or documented incorrectly; not performed; incompletely performed; or not documented for *{includes QC not performed or unacceptable, expired reagents used; use QC92** if testing is positive}*

VT-71-00 Other
VT-71-01 HBV
VT-71-02 HIV
VT-71-06 Syphilis
VT-71-07 HTLV
VT-71-10 HCV
VT-71-11 More than 1 test, e.g., all viral markers
VT-71-12 Cytomegalovirus
VT-71-15 Multiplex Nucleic Acid Test (NAT)
VT-71-17 West Nile Virus
VT-71-18 T. Cruzi (Chagas)
VT-71-19 Bacterial testing
VT-71-21 Babesia

VT-72-** Sample identification
VT-72-01 Other
VT-72-02 Incorrect sample tested
VT-72-03 Sample used for testing was incorrectly or incompletely labeled
VT-72-04 Unsuitable sample used for testing

RT--** ROUTINE TESTING**

RT-60-** Miscellaneous
RT-60-01 Other

RT-61-** Testing performed, interpreted, or documented incorrectly; not performed; incompletely performed; or not documented for *{includes discrepancies in testing due to weak reactions; QC not performed or unacceptable; expired reagents used; use QC92** if testing positive; use QC9406 if reagents used on automated instrument were expired or QC was not performed or documented}*

RT-61-01 Other
RT-61-04 ABO and/or Rh (*includes failure to perform patient recheck/retyping*)
RT-61-05 Antibody screening or identification
RT-61-06 Antigen typing
RT-61-07 Platelet count
RT-61-08 Compatibility *{includes electronic or immediate spin crossmatch performed instead of full crossmatch, when required}*
RT-61-09 ABO, Rh, and antibody screen
RT-61-10 ABO, Rh, antibody screen, and compatibility
RT-61-11 Antibody screen and compatibility

RT-62-** Sample identification

RT-62-01 Other
RT-62-02 Incorrect sample tested
RT-62-03 Sample used for testing was incorrectly or incompletely labeled
RT-62-04 Unsuitable sample used for testing (e.g., too old)

LA--** LABELING**

LA-80-** Miscellaneous
LA-80-01 Other

LA-81-** Labels applied to blood unit incorrect or missing information

LA-81-01 Other *{includes units collected from a paid donor labeled as collected from a volunteer donor}*
LA-81-02 ABO and/or Rh incorrect or missing
LA-81-04 Product type or code incorrect or missing (e.g., RBC labeled as Whole Blood) *{reporting is not required if part or container identification was incorrect or missing; do not use LA8104 if there is a specific code available, e.g., use LA8113 if unit not labeled as leukoreduced}*
LA-81-06 Expiration date or time extended or missing
LA-81-08 Anticoagulant incorrect or missing (e.g., CPD vs ACD)
LA-81-09 Donor/unit number incorrect or missing
LA-81-10 Combination of incorrect or missing information *{e.g., unit number and expiration date}*
LA-81-11 Product volume incorrect or missing
LA-81-12 Irradiation status incorrect or missing
LA-81-13 Leukoreduction status incorrect or missing
LA-81-14 Irradiation and leukoreduction status incorrect or missing
LA-81-15 CMV status incorrect or missing
LA-81-16 Machine-readable bar code incorrect or missing *{Lot number, product code, or ABO and Rh of the donor}*
LA-81-17 Transfusion-transmitted infection testing status incorrect or missing *{e.g., HIV, HBV, HCV}*
LA-81-18 Anticoagulant volume on Whole Blood unit incorrect or missing

LA-82-** Crossmatch tag, tie tag or transfusion record incorrect or missing information *{Use LA-82 if tag physically attached to the unit is incorrect or missing information, the transfusion record, accompanied with unit, is incorrect or missing information, or both the tag and transfusion record are incorrect or missing information}*

LA-82-01 Other *{includes required information that's not identified in any other deviation code}*
LA-82-02 Unit ABO and/or Rh incorrect or missing
LA-82-03 Recipient ABO and/or Rh incorrect or missing
LA-82-04 Product type or code incorrect or missing *{reporting is not required if part or container identification was incorrect or missing}*
LA-82-05 Expiration date or time extended or missing
LA-82-06 Unit or pool number incorrect or missing *{reporting is not required if tag/transfusion record was switched between two units intended for the same patient}*
LA-82-07 Recipient identification incorrect or missing

LA-82-08 Antigen incorrect or missing
 LA-82-09 Antibody incorrect or missing
 LA-82-10 Platelet count incorrect or missing
 LA-82-12 Product volume incorrect or missing
 LA-82-13 CMV status incorrect or missing
 LA-82-14 Irradiation status incorrect or missing
 LA-82-15 Leukoreduced status incorrect or missing
 LA-82-17 Compatibility information incorrect or missing
 LA-82-19 Combination of incorrect or missing information *{e.g., unit number and expiration date}*
 LA-82-20 Crossmatch tag, tie tag, or transfusion record missing or attached to incorrect unit *{e.g., intended for different patient; reporting is not required if tag/transfusion record was switched between two units intended for the same patient}*
 LA-82-21 Anticoagulant volume on Whole Blood unit incorrect or missing

QC--** QUALITY CONTROL AND DISTRIBUTION**

QC-90-**-** Miscellaneous
 QC-90-01 Other

QC-91-**-** Failure to quarantine unit due to medical history *{includes failure to quarantine after receiving post donation information, use the code specific to the post donation information}*

QC-91-01 Other *{includes type of behavior or history unknown or not specified; unacceptable address; donor unreliable, for example mental status questionable}*

QC-91-02 History of hepatitis, not specified, or tested reactive prior to donation

QC-91-03 History of jaundice

QC-91-04 History of Hepatitis B, or tested reactive prior to donation

QC-91-05 History of Hepatitis C, or tested reactive prior to donation

QC-91-06 History of syphilis, or tested reactive prior to donation

QC-91-07 Intimate contact with risk for a relevant transfusion-transmitted infection - syphilis

QC-91-13 Non-specific intimate contact with risk for a relevant transfusion-transmitted infection *{includes contact with an individual who was deferred by another center, on a national deferral list, or tested reactive for an unknown viral marker}*

QC-91-14 Male donor had sex with another man

QC-91-15 Female had sex with a man who had sex with another man

QC-91-16 IV drug use not prescribed by a doctor *{includes taking illegal drugs by needle, e.g., IM}*

QC-91-17 Sex partner used IV drugs not prescribed by a doctor

QC-91-22 Exchanged sex for drugs or money

QC-91-23 Sex partner exchanged sex for drugs or money

QC-91-28 Donor received transfusion

QC-91-29 Donor received xenotransplantation product (specify product) *{does not include human tissue products}*

QC-91-36 Travel to or residence in a malaria endemic area/history of malaria

QC-91-37 History of disease *{donor was aware of condition or disease prior to donation; does not include diseases that do not affect the safety, purity, or potency of the product e.g., heart disease, hemochromatosis, autoimmune disorders, such as Rheumatoid Arthritis, Lupus}*

QC-91-39 History of Creutzfeldt-Jakob Disease

†QC-91-40 Risk factors associated with Creutzfeldt-Jakob Disease - received human cadaveric (allogeneic) dura mater transplant

†QC-91-41 Risk factors associated with Creutzfeldt-Jakob Disease - family history (blood relative diagnosed with familial prion disease {e.g., fCJD, GSS, or FFI})

QC-91-44 Received cadaveric pituitary growth hormone

QC-91-45 Received finasteride, etretinate, isotretinoin, dutasteride (specify medication) *{e.g., Proscar, Propecia, Tegison, Accutane, Avodart, Jalyn, or Absorica}*

QC-91-46 Received antibiotics or medication which may adversely affect the product (specify medication) *{e.g., platelet inhibitor drugs; drugs with teratogenic effect; does not include anticoagulant therapy}*

QC-91-47 Received vaccine or immune globulin
 QC-91-48 Exposure to a disease
 QC-91-49 Incarcerated
 QC-91-53 Multiple high-risk behaviors/contacts
 QC-91-55 Donor deferred by another center due to history or tested reactive, specific history or testing unknown *{reason for deferral unknown or not provided by the other center – use more specific QC code if reason known}*
 QC-91-56 Post donation illness
 QC-91-59 Risk factor associated with Chagas *{includes tested reactive prior to donation}*
 QC-91-60 Donor received tattoo and/or piercing *{includes tattoo, any type of piercing or a combination of tattoo and/or piercing and any other type of potential blood exposure}*
 QC-91-61 Donor was exposed to blood or body fluids other than tattoo or piercing *{includes accidental needlestick, animal bite; human bite; occupational exposure; scarification; branding; exposure not specified; multiple exposures, not including tattoo or piercing}*
 QC-91-62 Intimate contact with risk for a relevant transfusion-transmitted infection - HIV
 QC-91-63 Intimate contact with risk for a relevant transfusion-transmitted infection - HTLV
 QC-91-64 Intimate contact with risk for a relevant transfusion-transmitted infection - HBV
 QC-91-65 Intimate contact with risk for a relevant transfusion-transmitted infection - HCV
 QC-91-66 Intimate contact with risk for a relevant transfusion-transmitted infection - hepatitis, not specified
 QC-91-67 Intimate contact with risk for a relevant transfusion-transmitted infection – Other

QC-92-** Product identified as unsuitable due to positive testing, event discovered subsequent to distribution *{Use RT61** or VT71** if testing was performed incorrectly, not performed, incompletely performed, or not documented; use QC9418, for events involving RTTI, if discovered prior to distribution but failed to quarantine product}*

QC-92-01 Other
 QC-92-02 HIV
 QC-92-03 HBV (HBsAg, HBV NAT)
 QC-92-04 Anti-HBc
 QC-92-05 HCV (Anti-HCV, HCV NAT)
 QC-92-06 Anti-HTLV
 QC-92-10 Antibody screen or identification (donor/unit or recipient)
 QC-92-11 Antigen screen
 QC-92-12 Syphilis
 QC-92-13 All viral markers
 QC-92-14 Compatibility
 QC-92-15 Multiplex Nucleic Acid Test (NAT)
 QC-92-16 Bacterial testing (identify organism if possible) *{reporting is not required if the gram stain is negative, and no organism was identified}*
 QC-92-18 West Nile Virus
 QC-92-19 T. Cruzi (Chagas)
 QC-92-20 Babesia

QC-94-** Distribution of product that did not meet specifications

QC-94-01 Other *{includes product distributed prior to required record review}*
 QC-94-02 Outdated product
 QC-94-04 Product QC unacceptable, not performed, not documented, or incomplete *{includes platelet count/yield; product hematocrit/hemoglobin; RBC recovery; absolute red cell volume or product volume; WBC count; pH; product QC not performed during validation of the apheresis process}*
 QC-94-05 Product in which specification, other than QC, was not met *{includes incorrect dose (e.g., single unit vs. pooled unit); age of product; appearance (foreign object or particulates); distribution of low titer plasma}*
 QC-94-06 Product in which instrument QC, calibration, or validation was unacceptable, incomplete, not performed or not documented *{includes hemoglobin/hematocrit reagents}*;

microhematocrit centrifuge; trip scale; collection device; incubator/heat block; waterbath; centrifuge; irradiator; hematology analyzer/cell counter; immunohematology instrument/analyzer; bacterial detection device}

QC-94-08 Product distributed prior to resolution of discrepancy *{conflicting information that requires investigation which is not resolved prior to distribution, e.g., discrepant test results, ABO discrepancy, Whole Blood Number discrepancy; do not use QC9408 if more specific code applies, such as QC9412 through QC9418}*

QC-94-09 Product associated with product that contained clots or hemolysis *{use QC9409 if in-house component is discovered to be clotted or hemolyzed and associated component has already been distributed; use QC9412 if in-house component is discovered to be clotted or hemolyzed and associated product was not quarantined; use BC4305 (clotted) or BC4306 (hemolyzed) if consignee discovers component is clotted or hemolyzed and associated components were also distributed}*

QC-94-12 Product identified as unsuitable due to a collection deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product; includes potential air contamination, arm preparation/inspection not performed or documented incorrectly, unit or associated unit was clotted or hemolyzed}*

QC-94-13 Product identified as unsuitable due to a component preparation deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product; includes leukoreduction or irradiation not performed in accordance with specifications; transport (from collection center) conditions unacceptable, not documented, or discrepant}*

QC-94-14 Product identified as unsuitable due to a labeling deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product}*

QC-94-15 Product identified as unsuitable due to a donor screening deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product; includes donor history question not answered or incomplete}*

QC-94-16 Product identified as unsuitable due to a donor deferral deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product}*

QC-94-17 Product identified as unsuitable due to a shipping or storage deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product; includes temperature excursions}*

QC-94-18 Product identified as unsuitable due to a transfusion-transmitted infection testing deviation or unexpected event *{event discovered prior to distribution, but failed to quarantine product; includes products released with positive or incomplete testing, e.g., HBV, HCV, HIV, bacterial testing}*

QC-96-** Shipping and storage

QC-96-01 Other

QC-96-03 Product stored at incorrect temperature

QC-96-04 No documentation that product was stored at appropriate temperature

†QC-96-07 Product shipped at incorrect temperature *{includes shipment with incorrect or missing coolant, e.g., no ice in RBC shipment; number of units did not meet validated container}*

QC-96-08 Product was reissued without a record of proper temperature maintenance *{includes no record of inspection upon return}*

QC-96-09 Visual inspection not performed or documented by blood center prior to distribution

QC-97-** Distribution procedure not performed in accordance with blood bank transfusion service's specifications

QC-97-01 Other

QC-97-02 Product not irradiated as required

QC-97-03 Product issued to wrong patient

QC-97-04 Improper product selected for patient *{e.g., FFP issued instead of RBC; use more specific codes, such as RT6106 if specific antigen typing is not performed; use QC9405 if incorrect dose (e.g., single unit vs. pooled unit) or incorrect age of product (e.g., not fresh) is issued}*

QC-97-05 Improper ABO or Rh type selected for patient

QC-97-06 Product not leukoreduced as required
QC-97-07 Product released prior to obtaining current sample for ABO, Rh, antibody screen and/or compatibility testing *{includes original sample was expired, patient left facility and new sample was required; antibody screen/crossmatch expired}*
QC-97-08 Product not CMV negative as required
QC-97-10 Filter not issued with product or incorrect filter issued
QC-97-11 Product not irradiated and leukoreduced as required
QC-97-12 Product not irradiated and CMV negative as required
QC-97-13 Procedure for issuing not performed or documented in accordance with specifications; use QC9719 if the visual inspection was not performed *{includes request slip labeled with incorrect or missing patient identification; emergency release procedure not followed}*
QC-97-16 Product inspected and accepted upon receipt from blood center, subsequently discovered to be hemolyzed
QC-97-17 Product not washed as required
QC-97-18 Product returned and reissued inappropriately
QC-97-19 Visual inspection not performed, not documented, or inadequate, includes product not documented or incorrectly documented as issued in the computer (computer documentation is final check of issue process)
QC-97-20 Product not volume reduced as required
QC-97-21 Product not hemoglobin S negative or Sickle Cell protocol not met as required *{includes testing positive, not performed, performed incorrectly, QC not performed or unacceptable; product labeled incorrectly}*
QC-97-22 Product not HLA matched as required *{includes testing positive, not performed, performed incorrectly, product labeled incorrectly}*

QC-98-** Distribution of unit collected from a donor implicated in relevant transfusion-transmitted disease

QC-98-01 Other
QC-98-02 HIV
QC-98-03 Hepatitis (specify type, if known)
QC-98-04 West Nile Virus
QC-98-05 Babesia
QC-98-06 Chagas
QC-98-07 Malaria

QC-99-** Distribution of a unit collected from a donor who subsequently tested confirmed positive for a relevant transfusion transmitted disease *{use QC-99-** when confirmatory or additional supplemental testing is positive; if confirmatory or additional supplemental testing is not positive, a report is not required}*

QC-99-01 Other *{multiple markers}*
QC-99-02 HIV
QC-99-03 HBV
QC-99-04 HCV
QC-99-05 West Nile Virus
QC-99-06 HTLV
QC-99-07 Babesia
QC-99-08 Chagas

Licensed Non-Blood BPD Codes:

Use the following list of Biological Product Deviation (BPD) Codes to assign a specific code to a reportable event when you submit the report to FDA. Use the guidance document, ["Biological Product Deviation Reporting for Manufacturers of Biological Products Other than Blood and Blood Components,"](#) to determine if you must report an event. The list includes deviations from regulations, standards, and license application specifications that may affect the safety, purity, or potency of a product. These codes may not apply to all establishments. The use of BPD Codes will assist the FDA in analyzing the data submitted and streamline the trend analysis.

1. Revisions to Licensed Non-Blood BPD Reporting Codes for FY2023

A. The following codes have been modified:

- PS-54-** Administration set, or device constituent part (packaged with product) did not meet specifications
- QC-64-04 Broken or cracked vial/syringe/container/device constituent part

B. The following codes have been deleted:

- IM-12-** Container
 - IM-12-01 Specification not met
 - IM-12-02 Defective
- IM-13-01 Closures
 - IM-13-01 Specification not met
 - IM-13-02 Defective
- PS-51-** Product specification not met
 - PS-51-11 Container closure not secure or damaged
- PS-54-** Administration set (packaged with product) or device constituent part did not meet specification
 - PS-54-03 Defective

C. The following codes have been added:

- IM-15-** Incoming container, closure or device constituent part did not meet specifications or discovered defective
 - IM-15-01 Other
 - IM-15-02 Vial/container
 - IM-15-03 Syringe
 - IM-15-04 Container closer (e.g., stopper)
 - IM-15-05 Syringe tip cap
 - IM-15-06 Delivery system (autoinjector, insulin infusion pump)

Note: IM-15-** codes, which replace the use of the deleted codes in Section B, include complaints of leaking vials/syringes due to a loose cap; missing stoppers; damaged or incomplete seal. However, a deviation report is not required if the event was due to an administration error or if your investigation determines there is not enough information to reasonably suggest that a reportable event occurred (i.e., associated with manufacturing and occurred in your facility).

2. Licensed Non-Blood BPD Reporting Codes

Please use the appropriate code(s) from the listing below to report a deviation or unexpected event that occurred in a licensed non-blood establishment.

Changes made on October 1, 2022 (the beginning of FY2023) are identified with a dagger (†).

The changes to the deviation codes for FY2023 are listed below.

The following list is a summary of abbreviations used to identify each category of Licensed Non-Blood BPD codes:

IM - Incoming Material Specifications

PC - Process Controls

TE - Testing

LA - Labeling

PS - Product Specifications

QC - Quality Control and Distribution

IM--** INCOMING MATERIAL SPECIFICATIONS**

IM-10-**-** Miscellaneous

IM-10-01 Other

IM-14-**-** Source or raw material does not meet specifications or otherwise found to be unsuitable

IM-14-01 Other *{includes source material collected from donor who was at risk for vCJD/CJD or tested positive for a RTTI}*

IM-14-02 Contains precipitate/particle

IM-14-03 Contaminated with microorganism

IM-14-04 Contaminated with mold

IM-14-05 Impurities exceed specification

IM-14-06 Testing deviation

IM-14-07 Stored or shipped at incorrect temperature or lack of controlled temperature

†IM-15-**-** Incoming container, closure or device constituent part did not meet specifications or discovered defective *{includes vial, syringe, stopper, metal seal closure, syringe tip cap, delivery system}*

IM-15-01 Other

IM-15-02 Vial/container

IM-15-03 Syringe

IM-15-04 Container closer (e.g., stopper)

IM-15-05 Syringe tip cap

IM-15-06 Delivery system (autoinjector, insulin infusion pump)

PC--** PROCESS CONTROLS**

PC-20-**-** Miscellaneous

PC-20-01 Other

PC-21-**-** Manufacturing or processing performed using incorrect parameters

PC-21-01 Other

PC-21-02 Incorrect temperature

PC-21-03 Filling not performed according to specifications

PC-21-04 Aseptic processing not performed according to procedures

PC-22-**-** Process/Procedure

PC-22-01 Other

PC-22-02 Interruption of process

PC-22-03 Environmental monitoring excursions; environmental monitoring not performed or performed incorrectly

PC-22-04 Equipment not performing properly
PC-22-05 Sanitization, cleaning or maintenance of equipment not performed or performed incorrectly
PC-22-06 Media fill failure or media fill performed incorrectly
PC-22-07 In-process testing/controls not performed, performed incorrectly, or inadequate

PC-23-** Process Water - specification not met

PC-23-01 Other
PC-23-02 Water for injection
PC-23-03 Purified water

PC-24-** Bulk or intermediate material does not meet specifications or otherwise found to be unsuitable

PC-24-01 Other
PC-24-02 Contains precipitate/particle
PC-24-03 Contaminated with microorganism
PC-24-04 Contaminated with mold
PC-24-05 Impurities exceed specification
PC-24-06 Stored at incorrect temperature
PC-24-07 Stored for an excessive hold time

TE--** TESTING**

TE-30-** Miscellaneous

TE-30-01 Other

TE-31-** Safety

TE-31-01 Performed incorrectly
TE-31-02 Not performed or not documented

TE-32-** Purity

TE-32-01 Performed incorrectly
TE-32-02 Not performed or not documented

TE-33-** Potency

TE-33-01 Performed incorrectly
TE-33-02 Not performed or not documented

TE-34-** Sterility

TE-34-01 Performed incorrectly
TE-34-02 Not performed or not documented

TE-35-** Identity

TE-35-01 Performed incorrectly
TE-35-02 Not performed or not documented

TE-36-** Stability

TE-36-01 Performed incorrectly
TE-36-02 Not performed or not documented

LA--** LABELING**

LA-40-** Miscellaneous

LA-40-01 Other

LA-41-** Package insert

LA-41-01 Incorrect/illegible
LA-41-02 Missing
LA-41-03 Not current or approved

LA-42-** Product label
LA-42-01 Incorrect/illegible
LA-42-02 Missing

LA-43-** Carton label
LA-43-01 Incorrect/illegible
LA-43-02 Missing

LA-44-** Expiration date
LA-44-01 Extended/illegible
LA-44-02 Missing

LA-45-** Lot number
LA-45-01 Incorrect/illegible
LA-45-02 Missing

LA-46-** Storage temperature
LA-46-01 Incorrect/illegible
LA-46-02 Missing

LA-47-** Administration route
LA-47-01 Incorrect/illegible
LA-47-02 Missing

LA-48-** Concentration or volume
LA-48-01 Incorrect/illegible
LA-48-02 Missing

LA-49-** Multiple information *{e.g., lot number and expiration date}*
LA-49-01 Incorrect/illegible
LA-49-02 Missing

PS--** PRODUCT SPECIFICATIONS**

PS-50-** Miscellaneous
PS-50-01 Other

PS-51-** Product specification not met
PS-51-01 Other
PS-51-02 Contains precipitate
PS-51-03 Contaminated with microorganism
PS-51-04 Contaminated with mold
PS-51-05 Impurity levels
PS-51-06 Moisture
PS-51-07 Preservative content
PS-51-08 Potency
PS-51-09 Appearance *{includes cloudy; hemolyzed; foreign object/particle, color}*
PS-51-10 Fill volume
PS-51-12 Unexpected positive, negative, or weak reactions in testing

PS-52-** Component packaged with final product did not meet specifications
PS-52-01 Other
PS-52-02 Contains precipitate/particle
PS-52-03 Contaminated with microorganism
PS-52-04 Contaminated with mold
PS-52-05 Fill volume

PS-52-06 Broken/cracked vial

PS-53-** Stability testing failed

- PS-53-01 Other
- PS-53-02 Potency
- PS-53-03 Preservative
- PS-53-04 Container closure integrity
- PS-53-05 Chemical analysis/purity
- PS-53-06 Moisture
- PS-53-07 pH
- PS-53-08 Appearance

†PS-54-** Administration set, or device constituent part (packaged with product) did not meet specifications

- PS-54-01 Other
- PS-54-02 Incorrect or missing label
- PS-54-04 Expired

QC--** QUALITY CONTROL AND DISTRIBUTION**

QC-60-** Miscellaneous

- QC-60-01 Other

QC-61-** Product distributed inappropriately

- QC-61-01 Other
- QC-61-02 Product distributed prior to completion of required testing
- QC-61-03 Product distributed prior to CBER approval of a PAS
- QC-61-04 Product distributed less than 30 days after submission of CBE-30 or prior to submission of CBE-30
- QC-61-05 Product distributed prior to validation of process
- QC-61-06 Outdated product distributed
- QC-61-07 Product distributed prior to record review or release by the quality control unit

QC-62-** Shipping and storage

- QC-62-01 Other
- QC-62-02 Product shipped at incorrect temperature
- QC-62-03 Product stored at incorrect temperature
- QC-62-04 No documentation product was shipped or stored at appropriate temperature

QC-63-** Product identified as unacceptable, and not quarantined

- QC-63-01 Other

QC-64-** Packing

- QC-64-01 Other
- QC-64-02 Vial missing
- QC-64-03 Packaged incorrectly
- †QC-64-04 Broken or cracked vial/syringe/container/device constituent part
- QC-64-05 Improper orientation (e.g., sideways)

??-??-?? DO NOT KNOW

HCT/P Deviation Codes:

Use the following list of Human Cells, Tissues and Cellular and Tissue-based Products (HCT/P) Deviation Codes to assign a specific code to a reportable event when you submit the report to FDA. Use the guidance document, "[Deviation Reporting for Human Cells, Tissues, and Cellular and Tissue-Based Products Regulated Solely Under Section 361 of the Public Health Service Act and 21 CFR Part 1271](#)" to determine if you must report an event. The list includes numerous codes for HCT/P deviations [see 21 CFR 1271.3(dd)] that may occur. However, an event is only required to be reported, if it relates to core Current Good Tissue Practices (CGTP) [see 21 CFR 1271.150(b)], involves a distributed HCT/P, and occurs in your facility or a facility that performs a manufacturing step for you under contract, agreement, or other arrangement [see 21 CFR 1271.350(b)(2)]. The use of the HCT/P Deviation Codes will assist the FDA in analyzing the data submitted and streamline the trend analysis.

1. Revisions to HCT/P Deviation Reporting Codes for FY2023

The following codes have been added:

- DT-01-** Testing not performed or documented when required, for:
 - DT-01-12 West Nile Virus
- DT-02-** Testing incorrectly performed when required, for:
 - DT-02-12 West Nile Virus

2. HCT/P Deviation Reporting Codes

Please use the appropriate code(s) from the listing below to report an HCT/P deviation.

The following list is a summary of abbreviations used to identify each category of HCT/P Deviation Codes based on applicable core CGTP:

DE - Donor Eligibility
DS - Donor Screening
DT - Donor Testing
FA - Facilities
EC - Environmental Control
EQ - Equipment
SR - Supplies and Reagents
RE - Recovery
PC - Processing and Process Controls
LC - Labeling Controls
ST - Storage
SD - Receipt, Pre-Distribution, Shipment, and Distribution

DE--** DONOR ELIGIBILITY** (21 CFR 1271.50)

DE-02-** Ineligible donor accepted [except as provided in §1271.65(b)]
DE-02-01 Risk factors for, or clinical evidence of infection due to relevant communicable disease agents and diseases according to §1271.75(a)(1)
DE-02-02 Xenotransplant recipient accepted as donor
DE-02-04 Donor tested reactive for relevant communicable disease

DE-03-** Donor eligibility determination
DE-03-01 Not determined by a responsible person, as defined in §1271.3(t)

DE-99-** Miscellaneous
DE-99-01 Other

DS--** DONOR SCREENING (21 CFR 1271.75)**

DS-02-**-** Donor screening not performed [except as provided in §1271.60(d)] or performed incorrectly in the:

- DS-02-01 Donor medical history interview
- DS-02-02 Physical assessment of a cadaveric donor or physical examination of a living donor
- DS-02-03 Medical record review
- DS-02-04 Evaluation of communicable disease risks associated with xenotransplant
- DS-02-05 Abbreviated donor screening inappropriately used or not performed
- DS-02-06 Donor of viable, leukocyte-rich HCT/PPs not properly evaluated for evidence of infection due to HTLV

DS-99-**-** Miscellaneous

- DS-99-01 Other

DT--** DONOR TESTING (21 CFR 1271.80 and 1271.85)**

DT-01-**-** Testing not performed or documented when required, for:

- DT-01-01 Human immunodeficiency virus
- DT-01-03 Hepatitis B virus
- DT-01-04 Hepatitis C virus
- DT-01-05 Treponema pallidum
- DT-01-06 Human T-lymphotropic virus
- DT-01-08 Cytomegalovirus
- DT-01-11 Multiple tests
- †DT-01-12 West Nile Virus

DT-02-**-** Testing incorrectly performed when required, for:

- DT-02-01 Human immunodeficiency virus
- DT-02-03 Hepatitis B virus
- DT-02-04 Hepatitis C virus
- DT-02-05 Treponema pallidum
- DT-02-06 Human T-lymphotropic virus
- DT-02-08 Cytomegalovirus
- DT-02-11 Multiple tests
- †DT-02-12 West Nile Virus

DT-03-**-** Unacceptable specimen tested

- DT-03-01 Specimen collected more than 7 days before or after recovery (except for peripheral blood stem/progenitor cells)
- DT-03-02 Specimen collected from donor 1 month of age or younger, instead of from birth mother
- DT-03-03 Specimen collected from a peripheral blood stem cell donor more than 30 days before recovery
- DT-03-04 Specimen storage conditions not met
- DT-03-05 Specimen did not meet requirements in test kit package insert *{includes filtered specimen, specimen collected in an expired tube, outdated specimen}*
- DT-03-06 Donor incorrectly evaluated for plasma dilution
- DT-03-07 Donor not evaluated, or evaluation not documented for plasma dilution

DT-04-**-** Inappropriate test or test laboratory used

- DT-04-01 Required test used was not licensed, approved, or cleared *{includes HIV/HCV NAT performed on pooled samples instead of individual samples}*
- DT-04-02 Required tests approved for cadaveric specimens not used when available
- DT-04-03 Laboratory performing tests not CLIA certified (or equivalent for CMS)
- DT-04-04 Laboratory performing tests not FDA approved

DT-99-**-** Miscellaneous

- DT-99-01 Other

FA --** FACILITIES** (21 CFR 1271.190(a) and (b))

FA-01-**-** Design

FA-01-01 Facility not suitable in size, construction, and/or location

FA-01-02 Inadequate lighting, ventilation, plumbing, drainage and/or access to sinks and toilets

FA-02-**-** Cleaning and sanitization

FA-02-01 Facility not maintained in a clean, sanitary, and orderly manner

FA-02-02 Sewage, trash, and other refuse not disposed of in a timely, safe, and sanitary manner

FA-99-**-** Miscellaneous

FA-99-01 Other

EC--** ENVIRONMENTAL CONTROL** (21 CFR 1271.195(a))

EC-01-**-** Environmental controls, when required, not performed or documented for

EC-01-01 Temperature controls

EC-01-02 Humidity controls

EC-01-03 Ventilation and air filtration

EC-01-04 Cleaning and disinfecting of rooms and equipment to ensure aseptic processing operations

EC-01-05 Maintenance of equipment used to control conditions necessary for aseptic processing operations

EC-02-**-** Environmental controls, when required, incorrectly performed for

EC-02-01 Temperature controls

EC-02-02 Humidity controls

EC-02-03 Ventilation and air filtration

EC-02-04 Cleaning and disinfecting of rooms and equipment to ensure aseptic processing operations

EC-02-05 Maintenance of equipment used to control conditions necessary for aseptic processing operations

EC-99-**-** Miscellaneous

EC-99-01 Other

EQ--** EQUIPMENT** (21 CFR 1271.200(a))

EQ-01-**-** Design

EQ-01-01 Equipment is not of an appropriate design for its use, and/or suitably located

EQ-01-02 Equipment not capable of producing valid results

EQ-02-**-** Maintenance

EQ-02-01 Cleaning, sanitization, or maintenance of equipment not performed or documented in accordance with established schedules

EQ-99-**-** Miscellaneous

EQ-99-01 Other

SR--** SUPPLIES AND REAGENTS** (21 CFR 1271.210(a) and (b))

SR-01-**-** Not verified to meet specifications for use

SR-01-01 Supplies

SR-01-02 Reagents

SR-02-**-** Reagent unsuitable

SR-02-01 Not sterile, where appropriate

SR-99-** Miscellaneous
SR-99-01 - Other

RE--** - RECOVERY (21 CFR 1271.215)**

RE-01-** Manner of recovery
RE-01-01 HCT/P contaminated, potentially contaminated, or cross-contaminated during recovery

RE-99-** Miscellaneous
RE-99-01 Other

PC--** PROCESSING AND PROCESS CONTROLS (21 CFR 1271.220)**

PC-01-** Processing
PC-01-01 HCT/P contaminated, potentially contaminated, or cross-contaminated during processing
PC-01-02 HCT/Ps from two or more donors were pooled during manufacturing

PC-02-** In-process controls
PC-02-01 Not followed
PC-02-02 Inadequate

PC-03-** In-process testing
PC-03-01 Sample not representative of the material to be evaluated

PC-04-** Processing of Dura mater
PC-04-01 Available published validated process that reduces the risk of transmissible spongiform encephalopathy not used
PC-04-02 Available published validated process that reduces the risk of transmissible spongiform encephalopathy used, but not verified

PC-99-** Miscellaneous
PC-99-01 Other

LC--** LABELING CONTROLS (21 CFR 1271.250(a) and (b))**

LC-01-** Procedures to control labeling of HCT/Ps
LC-01-01 Not established or maintained
LC-01-02 Did not prevent mix-ups
LC-01-03 Did not allow proper identification

LC-02-** Verification procedures not performed for:
LC-02-01 Accuracy, legibility, or integrity

LC-99-** Miscellaneous
LC-99-01 Other

ST--** STORAGE (21 CFR 1271.260(a) through (d))**

ST-01-** Storage area and stock room not controlled to prevent mix-ups pertaining to the following items:
ST-01-01 HCT/Ps
ST-01-02 Supplies
ST-01-03 Reagents

ST-02-** Storage area and stock room not controlled to prevent contamination or cross-contamination pertaining to the following items:
ST-02-01 HCT/Ps
ST-02-02 Supplies
ST-02-03 Reagents

ST-03-** Storage temperature
ST-03-01 Not appropriate

ST-04-** Expiration date, where appropriate
ST-04-01 Incorrect or missing

ST-99-** Miscellaneous
ST-99-01 Other

SD--** RECEIPT, PRE-DISTRIBUTION SHIPMENT, AND DISTRIBUTION (21 CFR 1271.265(a) through (d))**

SD-01-** Quarantined HCT/Ps
SD-01-01 Shipped without quarantine identification

SD-02-** Inappropriate distribution
SD-02-01 Distributed without review of required records
SD-02-02 Distributed without sign-off by a responsible person
SD-02-03 Quarantined HCT/P that was determined ineligible for release
SD-02-04 Contaminated or potentially contaminated HCT/P
SD-02-05 Release criteria related to expiration date of product not met

SD-03-** Inappropriate shipping conditions
SD-03-01 Temperature
SD-03-02 Packaging
SD-03-03 Container construction

SD-04-** Receipt of incoming HCT/P
SD-04-01 Not evaluated for the presence and significance of microorganisms and inspected for damage and contamination

SD-99-** Miscellaneous
SD-99-01 Other

??-??-?? DO NOT KNOW

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