EXCEPTIONAL RELEASE OF NON-CONFORMING PRODUCT

REASON FOR ISSUE: DCR40891 180F091 replaced by 111F071 for exceptional release of Cardiovascular (CV) tissue. DCR41380 and DCR41438 SOP now aligned with exceptional release policy. Key responsibilities clarified and incident reporting requirements included. DCR41927 removed reference to 150F089 non-conforming product register as no longer fit for purpose.

1. PURPOSE

To ensure that exceptional release of Non-Conforming Products (NCPs) is carried out only after all other options have been investigated and the requesting clinician has been fully informed of the risks.

2. SCOPE

This is an NZBS national procedure; it applies to the issue of all blood components, Serum Eye Drops (SED), Cellular Therapy Products (CTPs) and tissue products (bone, skin and heart valves) that do not meet the required standard, regardless of the reason.

The release of an NCP can be initiated by the treating clinician e.g., urgent release of a SED preparation that has not completed sterility testing requirements. The exceptional release of a non-conforming platelet component may be initiated by NZBS in situations where a routine product that meets all manufacturing specifications is not available, provided sampling for bacterial contamination monitoring has been performed,) e.g., urgent release of a matched platelet prior to 36 hours having elapsed since collection.

3. KEY RESPONSIBILITIES

The Transfusion Medicine Specialist / Medical Officer (TMS / MO) is responsible for timely consultation with the treating clinician regarding the exceptional release of NCP and for authorising its release.

The Quality Business Partner (QBP), in consultation with the TMS, is responsible for review and approval of the release of the NCP. In the event of an after-hours request the QBP will review the request at their earliest opportunity during office hours.

In those situations, where the treating clinician has requested the release of NCP it is their responsibility to complete the applicable sections of the related request forms after discussion and consultation with NZBS TMS / MO.

Where NZBS has initiated the exceptional release of a non-conforming platelet component the TMS / MO at the site where the patient is situated will authorise the release after contacting the treating clinician. The National Manager Manufacturing is responsible for reviewing the decision to release as an NCP at the earliest opportunity to determine the reason a routine product that meets specification was not available.

Staff in laboratories that issue NCPs are responsible for raising an incident in QPulse at the time of issue, where appropriate. Not all NCPs require a QPulse incident to be raised, refer to section 7.1.3.

4. DEFINITIONS

- **NCP** - Non-Conforming Product.
- **Infectious Disease Testing / Infectious Disease Markers** - Tests including both serological and molecular tests (using nucleic acid amplification techniques, i.e. NAT) for HIV, Hep B, Hep C, Treponema pallidum (Syphilis) and HTLV-I/II.
- **Sterility testing** – the freedom from the presence of viable microorganisms.

5. HEART VALVES

Release of non-conforming cardiovascular tissue onto the Heart Valve List (i.e., into inventory) is already approved by the National Manager Cellular Therapy and Tissue Banking (CTTB), Tissue Bank QBP and Tissue Bank TMS. Cardiac surgeons often request these valves whilst in theatre and are aware that the heart valve is a non-conforming product prior to requesting the valve. It is not possible for a discussion to take place with the TMS or family prior to use due to the urgency of the request. All risks are discussed with the family relating to the use of human tissue before consent is obtained to operate, refer to 180M097 and 111F071.

6. DOCUMENTS

6.1 Required Documents

- All available information on the component / products to be issued.
- 111F019 Request from Treating Clinician for Exceptional Release of Non-Conforming Products*
- 111F024 Exceptional Release of Non-Conforming Platelet Component
- 111F165 Request for Exceptional Release of Non-Conforming Serum Eye Drops
- 111F071 Exceptional Release of Non-Conforming Cardiovascular Tissue
- 111P019 NZBS Terms and Conditions Relating to the Exceptional Release of Non-Conforming Products.
- 151M033 Issue and Return of Cellular Therapy Components
- 110F561 Record of Manual Stock Transfers/Bulk Distribution
- 191U014 Technical Services - Component Transformation
- 150M050d Handling Positive Results from the BacT / Alert System
- 150F013 Clinical Advice Form
- 180M097 Heart Valve Bank Issuing Cardiovascular Tissue to Theatre
- 111L002 Non-Conforming Component Label

*This form used for all NCPs except SEDs (111F165), NZBS initiated platelet non-conformance (111F024) and Cardiovascular Tissue (111F071).

7. PROCEDURE

7.1 Exceptional Release Requested by a Clinician

Possible reasons for a clinician to request a NCP include but are not limited to, the release of:

- Serum Eye Drop (SED) preparation that has not completed sterility testing requirements.
- Any product that has not completed all standard infectious marker testing
- A specifically collected blood component that has not been subjected to leucodepletion.
- Cellular Therapy product (HPC, MNC, NC and Granulocytes) issued:
    - Fresh with incomplete infectious marker results and/or incomplete sterility testing
    - Fresh or post cryopreservation with positive infectious marker results
    - Post cryopreservation with positive bacterial culture results (sterility)
    - Fresh or post cryopreservation which has undergone TMS authorised manipulation that is deviating from SOP e.g., filtration or salvage of leaked Cellular Therapy Product during breakage / breach

When clinicians request exceptional release of NCPs, NZBS requires the clinician to complete a request form prior to the product being released.

7.1.1 NZBS TMS / MO:

- Upon receipt of a request for a non-conforming product, confirm with the treating clinician that it is absolutely necessary to use the non-conforming product and that failure to do so would be considered life threatening, or in the case of SED; failure to use them would pose a risk to the patient's eyesight.
- If no standard product is available forward 111F019 (or 111F165 in the case of SED) to the requesting clinician. Discuss with the treating clinician:
    (a) Additional risks associated with the NCP.
    (b) Any other standard alternative that may be available.
    (c) The terms and conditions upon which the NCP is released and ascertain that they are clearly understood and agreed to as per 111P019.
    (d) That the request must be in writing and that the product can only be released upon receipt of 111F019 or 111F165 (Section One completed).
- It is the responsibility of the treating clinician to obtain informed consent from patient / guardian / representative of the patient for using the NCP (this statement appears in the declaration to be signed by the requesting clinician).
- Upon receipt of 111F019 or 111F165 from the requester, complete **Section Two**.
    - ❖ If the request is not approved record the rationale in Section Two and contact the requestor.
    - ❖ **During office hours**: If the request is approved forward to the local QBP to review and record approval of the process to release the NCP.
    - ❖ **After hours**: Quality staff are not available after hours so forward the form directly to the relevant Technical Services department (Blood Processing / Tissue Bank / CTL).

7.1.2 **NZBS QBP:**

- Upon receipt of 111F019 or 111F165 from the TMS / MO, review and complete **Section Three**.
  - ❖ **During office hours**: If the request is not approved record the rationale in Section Three and inform the TMS / MO
  - ❖ If the request is approved forward to the relevant Technical Services department (Blood Processing / Tissue Bank / CTL)
  - ❖ **After hours**: If a request was actioned after hours review the request at the earliest opportunity, complete Sections Three and Five and if necessary, discuss findings with the TMS / MO, recording the outcome on 150F013.

7.1.3 **Blood Processing / Tissue Bank / CTL:**

- Upon receipt of 111F019 or 111F165 from the QBP (during office hours) or TMS / MO (after hours): release the requested component and complete Section Four. Include a copy of 111F019 with the non-conforming CTP (refer to 151M033), tissue, or blood product at the time of depot move or issue. It may be helpful for clinical staff and Blood Bank to be aware that the product is non-conforming.
- Refer to 110F561 when performing a manual depot move e.g., in the case of an urgent granulocyte.
- Forward a copy of 111F165 (Sections One to Three and part of Section Four completed) to the requesting ophthalmologist when releasing SEDs as a non-conforming product.
- Raise QPulse incident report as required (refer to the table below).
- Following release of the NCP when all testing is complete, update the relevant form and forward to the TMS / MO.
- If the request was received after hours forward the relevant form to the QBP at the first opportunity the next day for their review.

Product Type	**Reason for Non-Conformance**	**QPulse Incident Required**
Autologous Tissue	Positive infectious disease testing and / or sterility testing	N
Autologous CT Product	Incomplete infectious disease testing and / or sterility testing	N
Autologous CT Product	Positive infectious disease testing	N
Autologous CT Product	Positive sterility testing	Y
All Fresh CT Products	Incomplete infectious disease testing and / or sterility testing	N*
Allogeneic CT Products	Incomplete infectious disease testing and / or sterility testing	N*
Cardiovascular Tissue	All non-conforming CV tissue is subject to pre-approval by NM CTTB, NM Quality and TB TMS	N
*Allogeneic CT Product (Fresh or Cryopreserved)	Issued with incomplete infectious disease and/or sterility testing and results are positive on completion	Y Notify TMS of results

7.2 Final Review of Exceptional Release Issue on Completion of Results

7.2.1 TMS / MO:

- Upon receipt of 111F019 or 111F165 from Technical Services staff: review completed results and sign **Section Five**.

N.B. If there are unexpected results, contact the treating clinician to discuss.

7.2.2 NZBS QBP

- Upon receipt of 111F019 or 111F165 from TMS: review and approve final results at the earliest opportunity and sign **Section Five**.

7.3 Exceptional Release of Non-Conforming Platelet Component prior to Routine Bacterial Sampling Initiated by NZBS

7.3.1 Requesting Department

- Complete the patient and clinician request details in **Section One** of 111F024 providing the justification for the request and the details of the non-conformance.
- Obtain authorisation from the local TMS / MO via 111F024. Requests from Palmerston North will be reviewed and authorised by the TMS / MO in Wellington.
- If it is out of office hours and you have contacted the on-call TMS / MO by telephone, record the verbal authorisation on 111F024. Forward to the TMS / MO during office hours for their signature.
- Upon approval by the TMS / MO, complete **Section Two** of 111F024 and forward to the local QBP to review and to record approval of the process to release the NCP. If the request is after-hours the QBP will review at their first opportunity during office hours.
- Inform the National Manager Manufacturing of the request without delay.

7.3.2 NZBS TMS / MO:

- Contact the treating clinician to discuss the risks of and alternatives to the use of the NCP.
- Ensure that the terms and conditions upon which the NCP is released are clearly understood and agreed to as per 111P019. Obtain the treating clinician's consent for the use of the NCP for his patient.
- Ensure that the treating clinician understands his responsibility to obtain informed consent from the patient / guardian / representative of the patient for the use of the NCP.
- Complete **Section One** of 111F024 and return to Blood Processing.

7.3.3 NZBS QBP:

- Review at the first opportunity during office hours and record authorisation in **Section Three** of 111F024.

7.3.4 Blood Processing

- Upon receipt of the authorisation to release the NCP, complete sampling for bacterial contamination of the platelet per routine procedures.
- Reduce the expiry to five days; refer to eProgesa User Guide 191U014. Attach 111L002 Non-Conforming Component Label below the weigh label, ensuring no essential information is covered, and complete relevant parts of **Section Four** of 111F024.

- Include a copy of 111F024 with the NCP at the time of depot move as it may be helpful for Clinical and Blood Bank staff to be aware that the product is non-conforming.
- Following release of the NCP, when all testing is complete, update 111F024.
- In the event that bacterial contamination testing returns an Initial Positive result proceed per 150M050d.

7.3.5 **Blood Bank**

- Record the details of the patient transfused in **Section Five** of 111F024 and forward to the originating Blood Processing department.
- Upon issue of the non-conforming product to a patient attach the non-conforming product paperwork to the eTraceline patient file.
- If the non-conforming product is not transfused to the patient recorded in Section Two, return the non-conforming product to the originating Blood Processing department.

7.3.6 **National Manager Manufacturing**

- Review the issue of non-conforming platelets at the earliest opportunity. The purpose of the review is to determine whether a standard platelet product could have been released and whether any changes to inventory or procedures may be required to minimise the need to release non-conforming platelets in the future.
- Complete **Section Six** of 111F024.

8. MINIMUM TRAINING REQUIREMENTS

☐	Complete Document Sign-Off Sheet (108F060). • Read specified sections: Sections:
☒	Complete Document Sign-Off Sheet (108F060). • Read and understand whole document
☐	Complete Document Sign-Off Sheet (108F060). • Formal training required. Specify: *(enter details of formal training)*
☐	Complete Training Module *(enter name of module)*
☐	No training required. Specify reason: