



Fairbanks Analytical Testing Audit Summary (Presentation for August 18, 2021 MCB Meeting)

<p>2019 Purpose: June - A2LA audit/EHL document review; STEC reporting; Tech. Director Hire</p> <p>Scope: Regulated parameters against AK Reg. and CLCD</p>	<p>2020 Purpose: June - Potency only audit</p> <p>Scope: Regulated Parameters against AK Reg. and CLCD</p>	<p>2021 Purpose: May - Full Audit</p> <p>Scope: Regulated Parameters against AK Reg. and CLCD</p>
<p><u>Elapsed time for documented correction</u> – 66 days (35-day full license suspension, 31 days <i>Aspergillus</i> and STEC suspension)</p>	<p><u>Elapsed time for documented correction</u> – 101 days (no license suspension)</p>	<p><u>Elapsed time for documented correction</u> – 92+ days (no license suspension)</p>
	<p><u>Repeat findings of prior audit</u> – 9 deficiencies (items represented in bold font below)</p>	<p><u>Repeat findings of prior audits</u> – 17 deficiencies (items represented in bold font below)</p>
<p><u>Traceability</u> – 8 deficiencies (documentation gaps)</p>	<p><u>Traceability</u> – not evaluated as benchsheets and raw data not observed</p>	<p><u>Traceability</u> – 3 deficiencies (documentation gaps)</p>
<p><u>Data Defense</u> – 17 deficiencies (unaddressed outliers, no calibrations and documentation gaps for support materials and equipment, lack of accuracy/precision assessments occurring, micro positive controls not documented – no negative control, potency lacking confirmation aspect)</p>	<p><u>Data Defense</u> – 19 deficiencies (unable to start defense, potency calculation errors, unaddressed outliers, SOP deficiencies (QC and 2° λ), reporting outside calibration – re: linearity study, support equipment calibration)</p>	<p><u>Data Defense</u> – 20 deficiencies (documentation gaps, unable to start defense, unavailable client reports, support equip calibrations, white-out use, calibration inconsistencies, calculation errors, 2° λ not per SOP, reporting outside calibration – re: gap from low:high calibrations)</p>
<p><u>Data Reproducibility</u> – 5 deficiencies (documentation gaps)</p>	<p><u>Data Reproducibility</u> – 6 deficiencies (unable to start, potency calculation errors for all matrices)</p>	<p><u>Data Reproducibility</u> – 7 deficiencies (unable to start, documentation gaps)</p>
<p><u>Quality Control/Training/PT</u> – 16 deficiencies (not performing or documentation gaps, internal audits not performed)</p>	<p><u>Quality Control/Training/PT</u> – 9 deficiencies (PT missing & outliers, training gaps, QC results management, documentation gaps, internal audits not performed)</p>	<p><u>Quality Control/Training/PT</u> – 4 deficiencies (PT outliers, calibration anomalies, micro control documentation gaps, internal audits not performed, QC results management)</p>



<p>2019 Purpose: June - A2LA audit/EHL document review; STEC reporting; Tech. Director Hire</p> <p>Scope: Regulated parameters against AK Reg. and CLCD (cont.)</p>	<p>2020 Purpose: June - Potency only audit</p> <p>Scope: Regulated Parameters against AK Reg. and CLCD (cont.)</p>	<p>2021 Purpose: May - Full Audit</p> <p>Scope: Regulated Parameters against AK Reg. and CLCD (cont.)</p>
<p><i>SOP Conformity</i> – 3 deficiencies (QC called for but not applied, text from other labs, state logo applied to a document)</p>	<p><i>SOP Conformity</i> – 1 deficiency (several document anomalies (inconsistencies between QAM and SOPs))</p>	<p><i>SOP Conformity</i> – 5 deficiencies (procedure changes not reflected in SOP, text from other labs, deviation from SOPs)</p>

- Definitions:
- Data Reproducibility – Sufficient information available to replicate the reported result.
 - Data Defense – Sufficient documentation, quality control, and quality assurance to support integrity and veracity of reported data.
 - Traceability – Sufficient documentation present to recreate activities.