

Reprocessing and Retesting – Process

Background:

Reprocessing of biological products is allowed for in accordance with title 9, *Code of Federal Regulations* (9 CFR), part 114.18. This is part of the regulatory flexibility built into the 9 CFR regulations. Additional guidance is found in Veterinary Services Memorandum No. 800.62 (VSM 800.62), Relabeling, Rebottling, and Reprocessing Veterinary Biological Products, Section VI. A-C.

VSM 800.62, Section VI.D, authorizes the reprocessing of product by adding two serials (both prepared in accordance with the filed Outline of Production) together to adjust antigen content. This is not meant to include a serial of completed product already in final containers.

Most steps follow the outline as listed in **ICSOP0010**, *Processing Serial Records*, with the following additions.

Biologics Compliance Assistant (BCA) Initial Review:

1. The BCA reviews the information on the incoming APHIS Form 2008 request (hardcopy or NCAH Portal submission) for accuracy and completeness. The top portion of **ICFRM0007**, *Reprocessing Worksheet (9 CFR 114.18 and VS Memo 800.62 VI.A-C)*, is used to document the review.
2. The BCA may audit the submission back in accordance with the current version of **ICWI0075**, *Audits and Reference Slips for IC Documents*, if the information required is incomplete.
3. If the submission is not audited back, it can be submitted to the Specialist for review.

Specialist Review:

1. Review submission in accordance with the regulations listed in 9 CFR 114.18.
2. Review the information listed on **ICFRM0007** and the supporting documents submitted.
 - a. This may require reviewing the Outline of Production and/or the Facility Documents.
 - b. Determine if the process described is detrimental to the purity of the product or would impact product stability.
3. NOTE – Reprocessing IS NOT GRANTED for products containing a rabies fraction.

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4. Determine if you will require a Special Test of the NEW/reprocessed serial. Sterility and/or potency tests can be considered. If the potency test uses animals, requesting potency testing is discouraged but not prohibited.
5. Provide your conclusion in LSRTIS:
Reprocessing & Retesting Approved
Reprocessing & Retesting DENIED
6. Submit to BCA for finalization.