



IPA Session 3

Introduction to Quality Management Maturity (QMM): Key Expectations from the Industry

Dr Samantha Atkinson
Executive Vice President, NSF



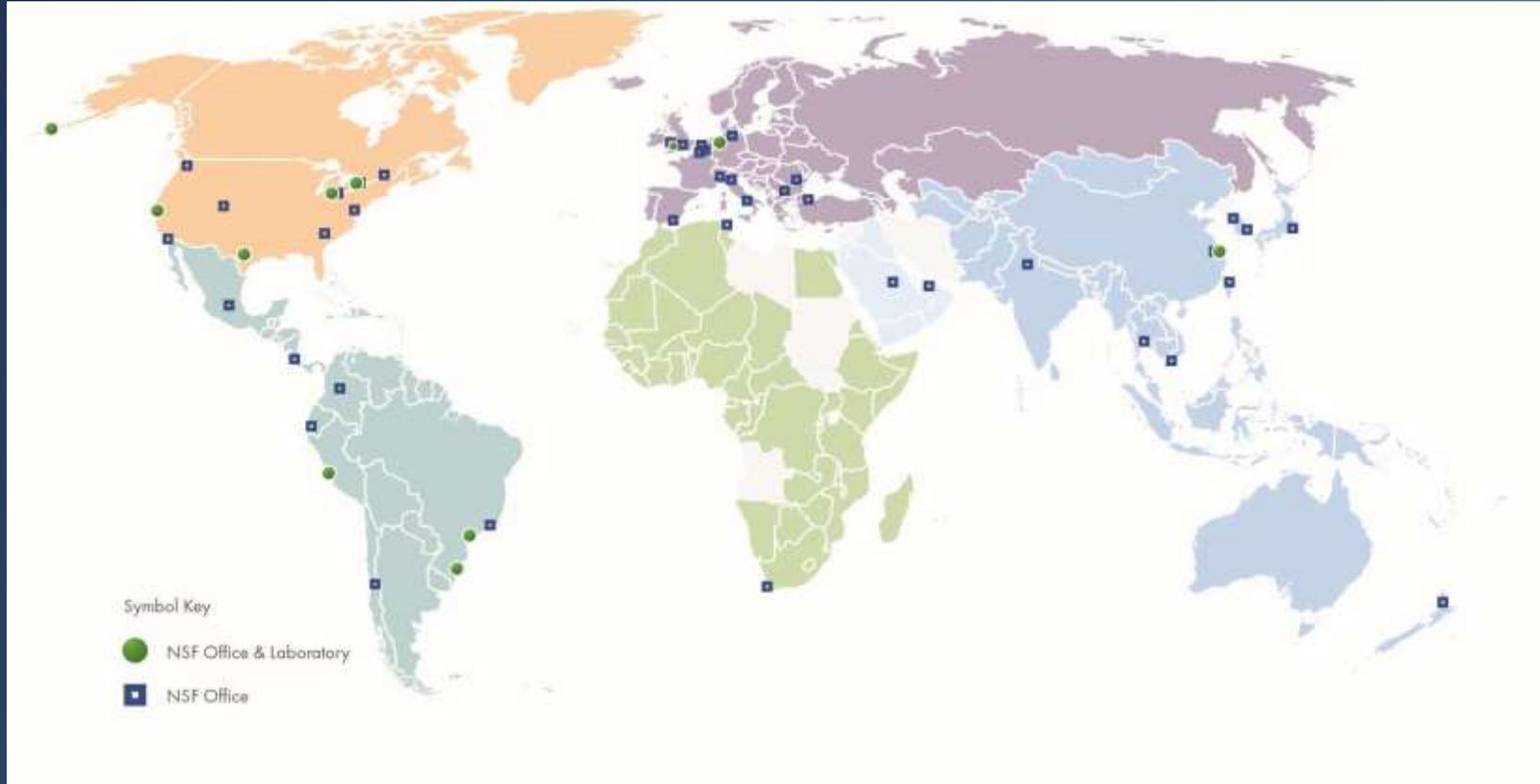
Dr Sam Atkinson

BSc (Hons), MSc, PhD, MBA, MRSC

Exec Vice President, NSF Health Sciences

- Former Chief Quality & Access Officer, UK MHRA.
- 20+ years experience of pharmaceutical industry, 16 years experience of which at the MHRA (Inspectorate through to Board level)
- Regulatory Compliance Strategy
- Business Strategy & Transformation
- Emergency Response & Incident Management
- Leadership Development
- Quality & Risk System Optimisation

NSF Around the Globe



NSF provides services in
175+ countries
with **~60 office and
laboratory** locations.

**~2800 Experienced
Professionals**, including
ex-Regulatory and ex-
Industry

**80 Years of Public Health
expertise**

Our Clients



-  • We work globally with Fortune 100 and Fortune 500 companies
-  • We also work with smaller companies to help them establish a footprint
-  • **80%** of our business is repeat or referral business

Our Services



STANDARDS



TESTING



CERTIFICATION



AUDITING



CONSULTING



TRAINING

◀ INDEPENDENT FROM CERTIFICATION ▶

Pharma Biotech | Expertise and Experience



Our staff of former FDA and EU officials and industry experts combines global regulatory knowledge with industry best practices to help you achieve successful regulatory strategies and execution as well as sustainable and compliant quality systems.

Our areas of expertise and experience encompass:

- Pharmaceuticals
- Biotechnology, including Biologics & Vaccines
- Medical Devices & In-Vitro Diagnostics
- Dietary Supplements
- Cosmetics



Service & Capabilities | Product Lifecycle Approach



Competencies – Pharma Biotech



Consulting	Quality Systems and Compliance	Auditing and Assessment	Regulatory and Clinical	Training and Education
GxP, Regulatory and Compliance support. Warning Letters and Regulatory Assistance	Compliance Assessment, Simplification, development and implementation against Industry best practice	GXP Audits <ul style="list-style-type: none"> • GMP • GLP • GCP • GVP • Data Integrity 	Regulatory Strategy Development Regulatory Affairs	Qualified Person Education
Consent Decrees	Data Integrity Analysis	3 rd Party and Supplier Audits	Clinical Trial Support	Pharmaceutical Audit and Self Inspection (IRCA)
AIP Data Integrity/Governance	Error proofing systems	Due Diligence	Regulatory Liaison and post approval changes)	Leadership development and coaching
Remediation Activities (reactive and proactive) Quality Management Maturity Assessment Culture Change Roadmaps	Quality System Design, Redesign and optimization Quality Culture and Change Management.	Regulatory Inspection Readiness Regulator – Incident Management	Conduct meetings with Regulatory Authorities inc FDA, MHRA, EMA etc	Public training course program (various – see interactive webpage)
Technical Consulting (e.g. Sterile, Formulation, Facility Design review, Start-up, Commissioning and Qualification etc)	Risk Management Quality Risk Management Approaches	Mock Regulatory Inspections (FDA, EMEA, MHRA etc) Inspector Training - How to inspect.	Global Submissions (eCTD) Regulatory Training: - Regulations & Guidance - Data evaluation & assessment - Train the Regulator	Customized in house programs: e,g GxP; Inspection readiness etc

Competencies - Medical Device Consulting – 6 Pillars



NSF's world class experts provide comprehensive services and solutions to effectively navigate the complex global regulatory landscape. Offering Consulting, Training, Auditing and Technical support across the total product lifecycle



Regulatory Strategies
& Premarket
Submissions



Clinical Support
& Claims
Management



Post Market
Surveillance &
Vigilance



FDA & Notified
Body Inspection
Readiness



Risk Management
& Quality System
Improvement



Emerging
Regulations &
Technical Support

Competencies - Training & Education Services



MEDICAL DEVICES AND IVDS TRAINING



MEDICAL DEVICE COUNTRY-SPECIFIC REGULATORY TRAINING

Medical Device Single Audit Program (MDSAP) Training
United States Medical Device Regulations – A Comprehensive Overview
Brazil Medical Device Regulations – A Comprehensive Overview
Canada Medical Device Regulations – A Comprehensive Overview
Japan Medical Device Regulations – A Comprehensive Overview
Australia Medical Device Regulations – A Comprehensive Overview
China Medical Device Regulations – A Comprehensive Overview
European Union Medical Device Regulation (EU MDR)
European Union In Vitro Diagnostic Device Regulation (EU IVDR)
ISO 13485: Medical Devices QMS – Requirements for Regulatory Purposes
ISO 13485:2016 Overview and Country-Specific Medical Devices Regulations: Six-Course Bundle
MDSAP Overview and Country-Specific Medical Device Regulations: Six-Course Bundle
FDA Inspections of Medical Device Manufacturers
Medical Device Regulatory Requirements: Five-Course MDSAP Bundle

MEDICAL DEVICE AUDITOR TRAINING

EU IVDR Internal Auditor Training
EU MDR Internal Auditor Training
CQIRCA-certified QMS Lead Auditor based on ISO 13485:2016 and MDSAP requirements
Internal Auditor Training Based on U.S. FDA 21 CFR Part 820
MDSAP Internal Auditor Training
Applying ISO 19011:2018 Principles to Medical Device Quality Management System Audits
Medical Device Single Audit Program (MDSAP)
Writing Effective Nonconformity Statements During Medical Device QMS Audits
Medical Device Regulatory Requirements: Five-Course MDSAP Bundle
MDSAP Overview and Country-Specific Medical Device Regulations: Six-Course Bundle
FDA Inspections of Medical Device Manufacturers
Introduction to Writing Effective Nonconformity Statements During Medical Device Manufacturer QMS Audits

MEDICAL DEVICE MARKET ACCESS REGULATORY TRAINING

510k
Bring
Tech
– EU
Desi
Desi
IVDS
Deci
Char
FDA
FDA
Man

MEDICAL DEVICE QMS AND GMP TRAINING

PHARMACEUTICAL TRAINING



AUDITOR

GMP Audits and Self-Inspections
Internal Auditor
Auditing QC Laboratories
Self-Inspections – How to Make Them Add Value to Your Organisation

QUALITY SYSTEMS

Responsible Person & Good Distribution Practice
Documentation Simplification
Supplier Quality Management
Certified Investigator
Deviation and CAPA Management
Quality Risk Management
Data Integrity
Pharmaceutical Quality Systems
Changing GMP Behaviors
Human Performance: Beyond Human Error
Self-Inspections – How to Make Them Add Value to Your Organisation
SOP Writing and revision
General Drug or Pharmaceutical cGMP and Quality Systems
Adverse Events and Product Quality Complaints – A Guide for Employees
Data Integrity eLearning
Human Error Prevention: Best Practices From Industry
Deviation Investigations and CAPA
GxP Refresher Training ICH Q8, Q9 and Q10
Change Control Overview

GXP

Pharmaceutical GMP
Responsible Person & Good Distribution Practice
Documentation Simplification
Good Clinical Practice
Good Pharmacovigilance Practice
Supplier Quality Management
Certified Investigator
Deviation and CAPA Management
GMP for Clinical Trials Manufacture & Supply
Quality Risk Management
Data Integrity
GMP for Engineers
GxP Inspection Management Lifecycle
SOP Writing and revision
The Roles and Responsibilities of an RP
Interface of GMP with GCP Quality Management Systems
Good Distribution Practices
General Drug or Pharmaceutical cGMP and Quality Systems
Deviation Investigations and CAPA
Adverse Events and Product Quality Complaints – A Guide for Employees
Data Integrity eLearning
GxP Refresher Training ICH Q8, Q9 and Q10
Change Control Overview
GMP Refresher Training

STERILE & BIOTECH

Formulation & Processing
Pharmaceutical Microbiology
A-Z of Sterile Product Manufacture
Cleaning Validation
Contamination Control Strategy
GMP for Biological & Biotechnology Products
Quality Risk Management for Sterile Products
Advanced Therapy Medicinal Products
Introduction to Advanced Therapy Medicinal Products
Analysis and Testing
Pharmaceutical Microbiology
Sterile Manufacturing Practices

OTHER TECHNICAL TRAINING

GMP for Clinical Trials Manufacture & Supply
Medicinal Chemistry & Therapeutics
Active Substances and Excipients Training
Mathematics & Statistics
Analysis & Testing
Pharmaceutical Packaging
Investigational Medicinal Products
Statistical Testing
Statistical Process Control
Cleaning Qualification
Computerized Systems Validation

QUALIFICATION & VALIDATION

Equipment Qualification and Process Validation (advanced)
Introduction to Validation Training
Cleaning Validation
Process Validation & Equipment Qualification
Cleaning Qualification
Computerized Systems Validation

REGULATORY

Pharmaceutical Law and Administration
Pharmaceutical Legislation Update Subscription Service
Regulatory Affairs for QA: Variations
Regulatory Affairs for QA: Marketing Authorizations

QUALIFIED PERSON

Pharmaceutical Law and Administration
Medicinal Chemistry & Therapeutics
Formulation & Processing
Pharmaceutical Microbiology
Active Substances and Excipients Training
Mathematics & Statistics
Analysis & Testing
Pharmaceutical Packaging
Pharmaceutical Quality Systems
Practical
Investigational Medicinal Products
Role & Professional Duties of the QP

Delivery Method: Instructor-led Courses (either in-person or virtual) Online Courses

For more information, each course is hyperlinked to our website. Or if you have any questions, email nsfmdtraining@nsf.org

Delivery Method: Instructor-led Courses (either in-person or virtual) Online Courses

For more information, each course is hyperlinked to our website. Or if you have any questions, email pharmacourses@nsf.org

Today



- Case Study – IBM
- Why is getting it right important?
- NSF Quality Management Maturity
- Road to Success
- What Success Looks Like

The turnaround of IBM



Chart: © 2021 MBI Concepts Corporation
(Source: *Mergent Industrial Manual*, Mergent Online, IBM Annual Reports, and various other documents.)

One Hundred Years of Market Value (1920–2020) by IBM Chief Executive Officer



Ref: DISCERNING READERS. (2021). *IBM CEOs' Yearly Market Value Performance*. [online] Available at: <https://www.discerningreaders.com/ibm-historical-by-ceo-yearly-market-value-performance.html>.

How did Gerstner turn IBM around?



Initial Actions – Business Optimisation and Cultural Maturity

- Listened to the workforce & lived their experiences.
- Embedded new values around respect, inclusivity and safety (vs fear/blame)
- Focus on ‘customer engagement’
- Removed internal tensions and competition
- Changed expectation of Leaders & Managers from gatekeepers for decision making, communication or reporting, to be actively involved.
- Changed the compensation system so that rewards were based on total corporate performance rather than division or unit performance.
- Changed the rules for getting promotions.
- Created a new and disruptive business strategy to – “offer solutions to customers” and allow IBM products and services to integrate with competitor products.

Alignment - in Culture & in Business



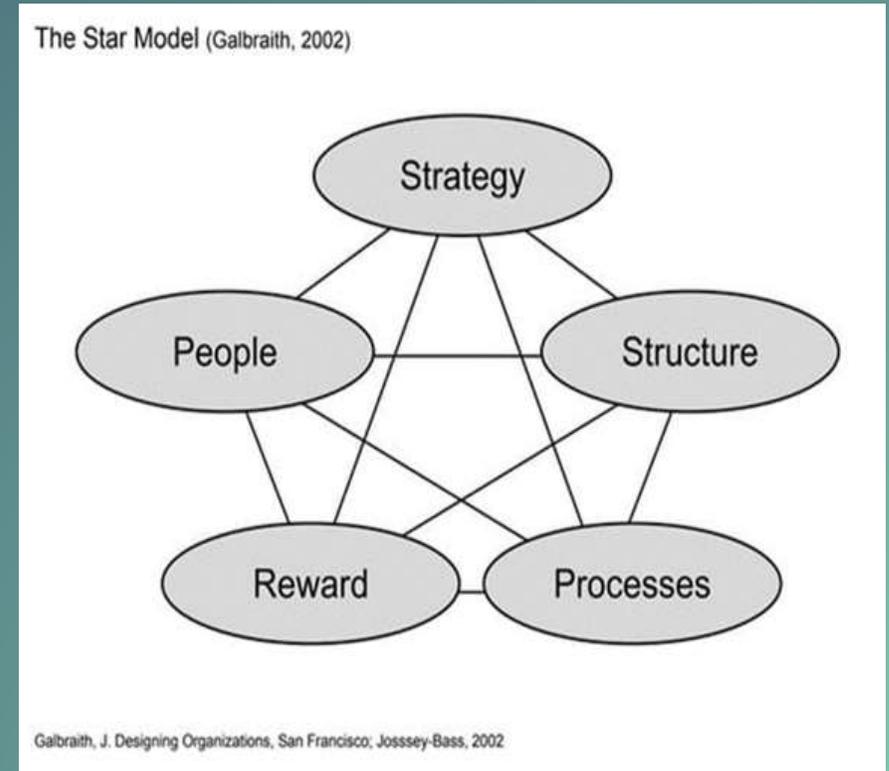
Galbraith's Star Model

Knowingly, or not, Gerstner was identifying and correcting mis-alignments...

This drove different behaviours across IBM...

Which in turn defined their new culture...

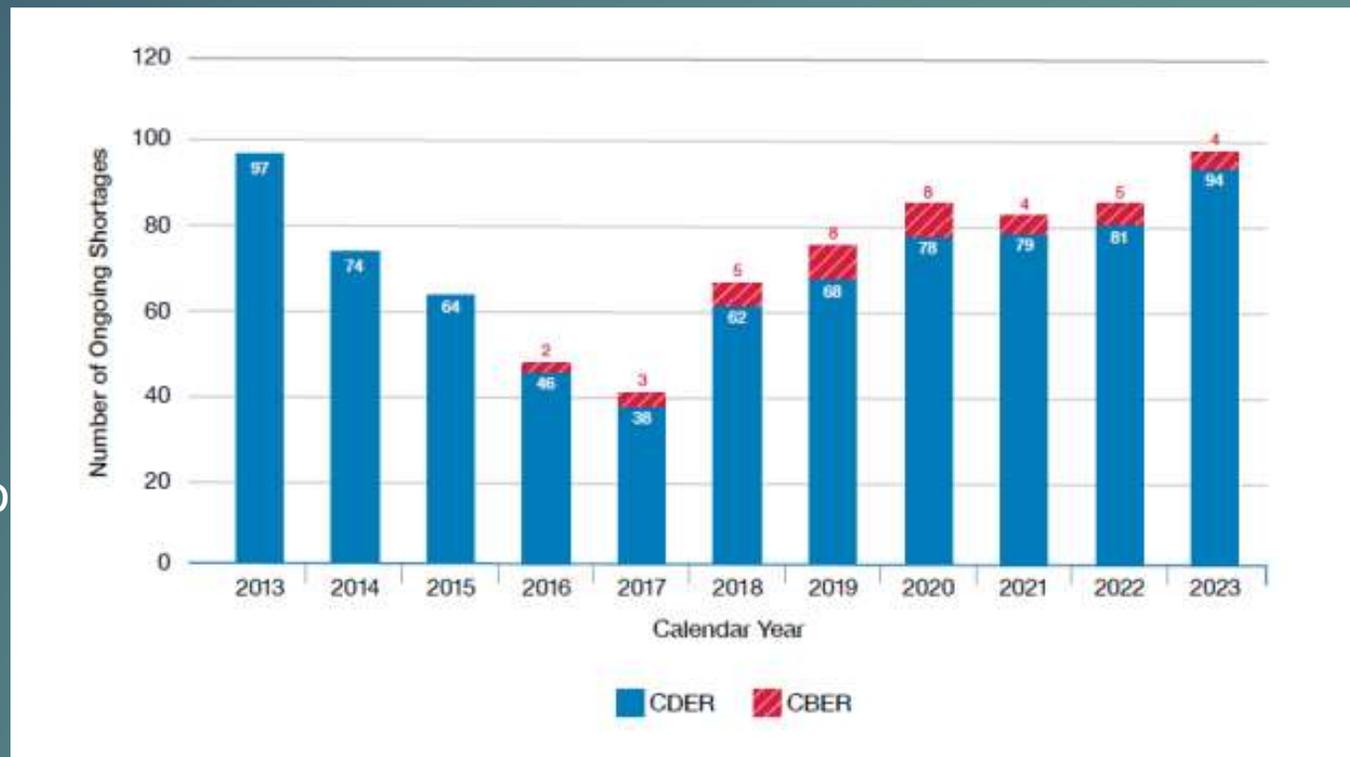
And business success.



Why is getting it right important?

US FDA

- As of December 31, 2023, FDA had identified 98 ongoing CDER- and CBER-tracked shortages.
- The number of new drug shortages per calendar year has declined from a high of 251 in 2011 to 55 in 2023.
- In 2023, FDA worked with manufacturers to successfully avoid a large number of drug shortages, helping to prevent 236 shortages.

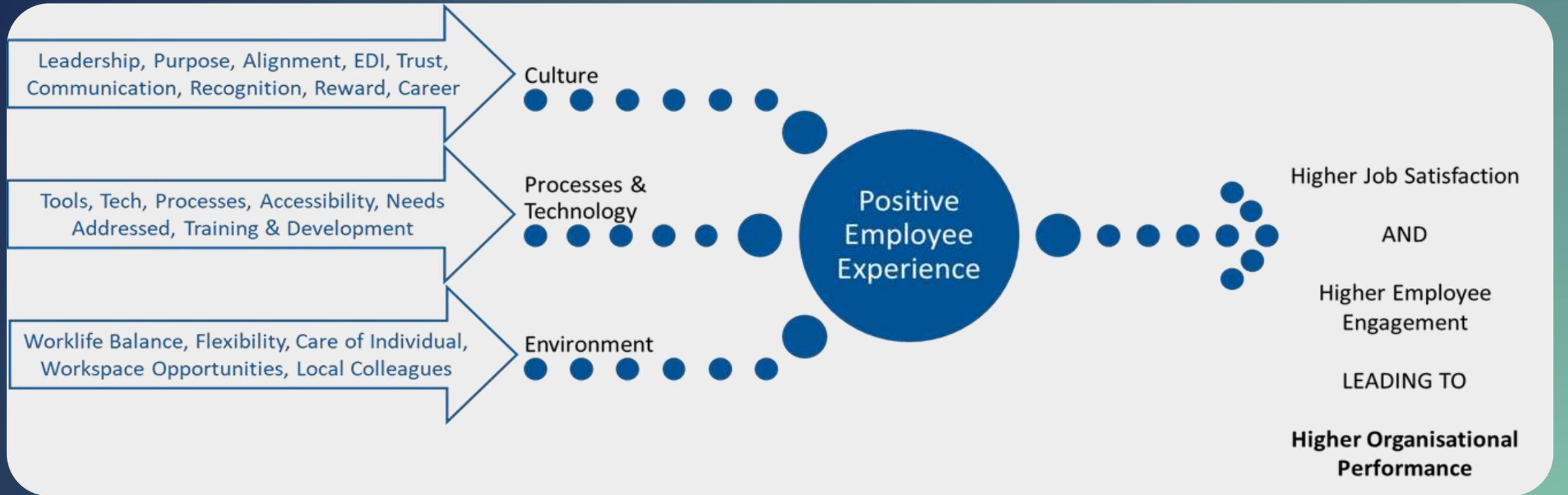


Source: https://www.fda.gov/media/179156/download?attachment=&utm_medium=email&utm_source=govdelivery

Impacts

- Patients
- Health Service Challenges
- Financial Costs

Road to Success



How to deliver the change

NSF's QMM



NSF's Quality Management Maturity (QMM) Assessment Model



Future-Proofing Quality and Supporting Supply Chain Robustness

Executive Summary

It is well recognized that the Quality Management System (QMS) — whether documentation, deviation and event management or GMP — is the focus of Regulatory Inspectors and indeed the cause of many findings. Given the requirements have been broadly the same for so long, why is this still an area of non-compliance?

Historically, and perhaps a harsh and simplistic assertion, is that the QMS has been managed as a function with a comprehensive set of instructions. However, more recently regulators, industry and quality professionals are looking at the QMS slightly differently. The QMS must be the heart and lungs of an organisation — it needs to breathe life into the organisation and must ensure that each operational part — from individuals, technology, equipment, to functions, teams and the leadership — operate in-unison. This shift in mindset recognizes the need to understand the impact and risk of people and culture in the successful deployment of a mature QMS.

So, how does the QMS feed every part of the organisation with oxygen and that those within the organisation recognize the importance of the QMS? How do regulators assess the impact of these intangible elements on the effectiveness and robustness of a QMS, and therefore compliance?

The NSF QMM Assessment Model (developed and introduced in 2022, following the publication of the US FDA Drug Shortages Task Force report in 2019) responds directly to this challenge. It provides a framework for assessing organizational quality maturity across the regulated landscape. It is designed to be used in parallel to the traditional considerations of compliance, and the NSF model has been designed to align and respond to the 11

NSF's QMM Assessment Areas



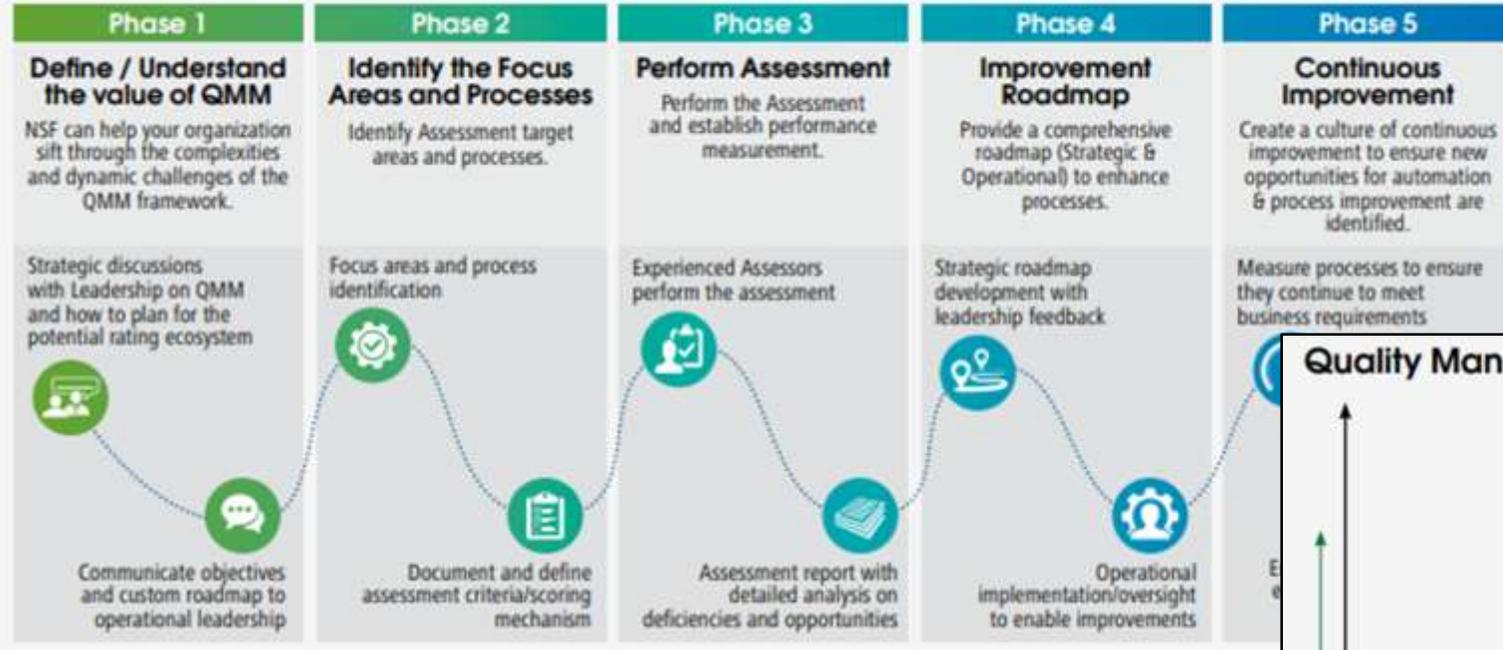
Key: Strategic Tactical Operational

- Current** Understand the current state of the Quality System beyond just metrics and audits. The model aligns to the **latest thinking and strategies** of global regulatory authorities.
- Future-Proofing** It supports **proactive continuous improvement** of an organisation's QMS.
- Strategic** It examines the **robustness and effectiveness of the QMS**. It looks beyond the immediate environment (i.e., what is in place/in use) and considers the wider influencing factors.
- Quality Culture** Critically, it also considers the **organisational culture** and the impact on the effectiveness of the QMS.
- Flexible** The model can be used in order to undertake an organisational/site **health check**, or to consider QMS **maturity improvements** following a regulatory inspection, for example.
- Client Focused** The model can be **tailored to suit a client's need** and focus in on key areas of concern/risk. The subsequent report can provide recommendations for those highlighted areas.

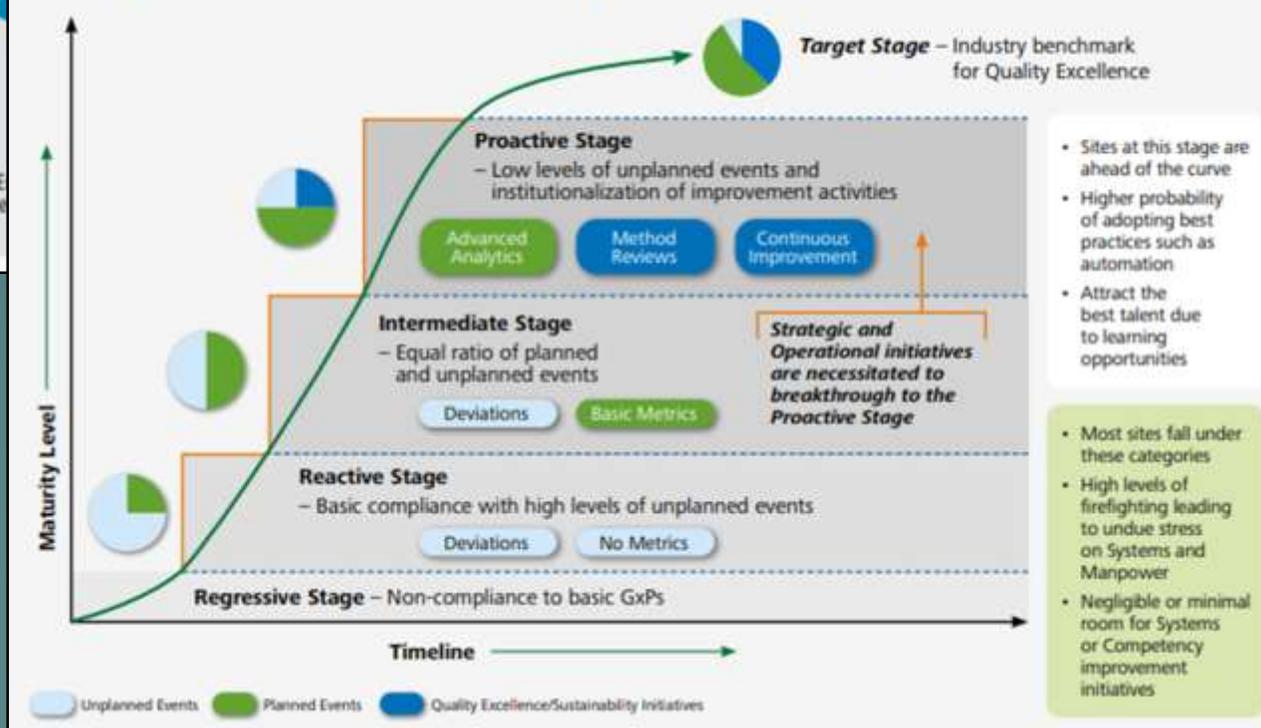
How to deliver the change NSF's QMM



NSF's QMM Process



Quality Management – Maturity Evolution



How to deliver the change

Culture Roadmap



Building a strong quality culture is essential for organisations striving for excellence in performance, compliance, and patient outcomes.

It requires:

- Comprehensive analysis and assessment of the organisation's current state
- Sustained commitment from leadership
- Collective accountability for quality
- Clear and aligned plan for ongoing maturity

By recognising the signs, implementing effective strategies, and fostering role modelling and alignment, organisations can navigate toward success.



What Success Looks Like



NSF have observed

Organisations with lower levels of Quality Management & Culture Maturity tend to exhibit

- Out of date procedures, procedures not being adequately or correctly followed, little to no proactive work on continuous improvement
- Minimal innovation and/or low level of creativity
- Higher than average levels of unplanned work resulting from deviations and excursions
- Lower levels of staff morale and higher levels of attrition

At a high level, organisations are operating in an optimal state and exhibit:

- Low levels of re-work and unplanned activities
- High levels of continuous improvement, application of best practice and workforce efficiency
- Higher levels of trust and autonomy leading to enhanced engagement and retention
- Better risk and investment decisions.

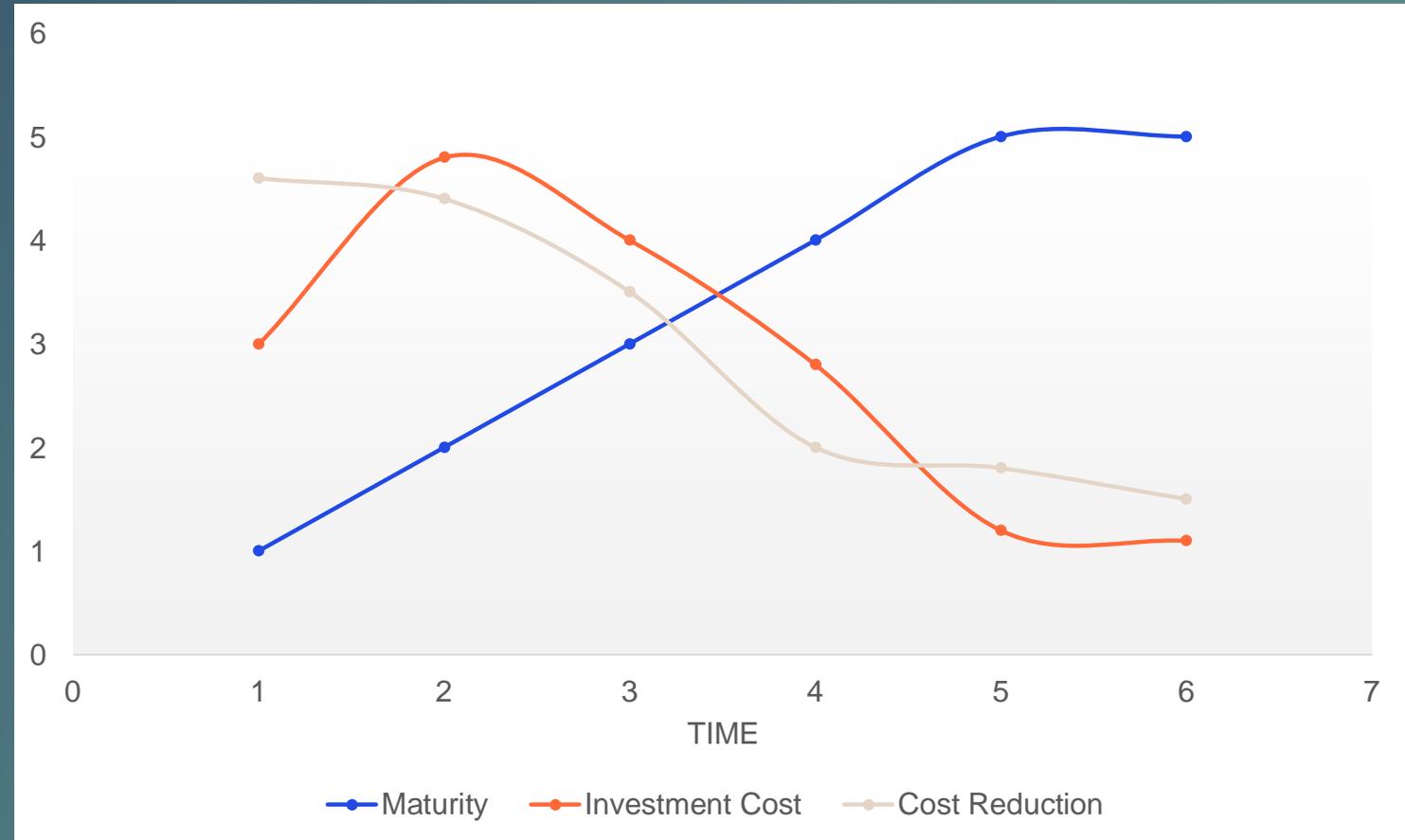
What Success Looks Like



NSF's own study in 2015 suggested, when referring to COPQ...

“in the pharmaceutical industry, it is not uncommon for such costs to range between 25 and 40 percent of total sales revenue”.

Source: <https://www.nsf.org/knowledge-library/the-importance-of-copq-for-the-pharmaceutical-industry>.



NSF's White Papers

QMM:

<https://www2.nsf.org/qmmwhitepaper>

Quality Culture:

<https://www2.nsf.org/qualityculture>



Dr Sam Atkinson

BSc (Hons), MSc, PhD, MBA, MRSC

Exec Vice President, NSF Health Sciences

- Former Chief Quality & Access Officer, UK MHRA.
- 20+ years experience of pharmaceutical industry, 16 years experience of which at the MHRA (Inspectorate through to Board level)
- Regulatory Compliance Strategy
- Business Strategy & Transformation
- Emergency Response & Incident Management
- Leadership Development
- Quality & Risk System Optimisation

THANK YOU!

satkinson:@nsf.org

Why NSF?

Experienced

NSF employees have **significant experience** of working in/with regulatory authorities and in industry.

Professional

We are dedicated to providing **high quality** outputs that **add real value** to an organisation.

Strategic

We look beyond the immediate environment and consider the wider regulatory landscape to provide **tailored advice**.

Flexible & Competitive

We can work onsite, hybrid or remotely, as needed. We offer **best-in-class** services at a **market competitive rate**.

Evidence Based

NSF have **access to leading benchmarking data** to support development of the NSF QMM model.

Track Record

NSF have **successfully used the QMM model** to assess other organisations and provide recommendations for further maturity.