Akin®

FDA Issues Draft Guidance for Responses to Form 483 Drug CGMP Inspections

March 16, 2026

Reading Time : **4 min**

By: Nathan A. Brown, Maddy L. Bolger

On March 9, 2026, the Food and Drug Administration (FDA) published a **draft guidance**, "Responding to FDA Form 483 Observations at the Conclusion of a Drug CGMP Inspection." The guidance is intended for foreign and domestic human and animal drug establishments manufacturing drugs regulated by the Center for Drug Evaluation and Research (CDER), the Center for Biologics Evaluation and Research (CBER) and the Center for Veterinary Medicine (CVM). The guidance is also intended for combination product manufacturers for which CDER or CBER is the lead center.

The guidance is meant to assist drug manufacturers in responding to FDA form 483 Inspectional Observations (FDA 483) at the end of an inspection that result in observations relating to current good manufacturing practices (cGMPs) and includes expectations regarding the content, timing and quality of FDA 483 responses for drug inspections and resolving scientific or technical disagreements with FDA 483 observations. Overall, the draft guidance emphasizes the importance of robust corrective and preventive actions (CAPAs) and management oversight, while also recommending a more standardized approach to formatting responses. While the guidance is not final, covered establishments should take this opportunity to assess and incorporate these suggestions into their FDA 483 response practices and in particular, their CAPA process, to the extent they have not already done so.

Below is a summary of the draft guidance. Establishments should closely review the guidance when submitting an FDA 483 response.

FDA 483 Response Format, Timing and Content

FDA states that an FDA 483 response should show that an establishment has addressed or is actively addressing the observations and any underlying issues associated with the observations. FDA recommends that the response include a table of contents and "at least" eight elements. The elements identified by FDA include the name of the establishment submitting the response, the full address of the inspected site and the site's FDA Establishment Identifier (FEI). The response should also include a copy of the FDA 483 issued at the end of the inspection; the identity of the response preparer and, if not prepared by the establishment, their relationship to the establishment; and the identity of the signatory of the written response, who should be someone in the establishment's executive management who allocates resources and has the authority to implement commitments, as recommended by FDA. FDA also recommends that the response includes any letters of authorization if the establishment has retained a consultant or outside counsel and any relevant global investigation plans and reports.

A key element of FDA's recommendations includes an executive summary of all remediation activities with key details and a more detailed description of each observation and remediation activity. FDA recommends that the summary include patient- and product-focused risk assessments, assessing both inventory and distributed drugs and effects on safety, identity, strength, quality and purity of potentially affected drugs; a detailed investigation report with scope, summary, a list of associated drugs and lot numbers, root causes and systemic issues, and a corrective and preventive action (CAPA) plan with applicable dates for completion; and attachments related to the associated observation, such as documents, pictures, video, diagrams and data, which should be signed. FDA recommends a table for the executive summary. Finally, FDA recommends a discussion of each FDA 483 observation and other items as appropriate.

As part of the response and follow-up responses, the guidance recommends that establishments submit preliminary results with a timeline for completion, along with interim measures in place until a CAPA is completed.

Recommendations for Addressing Observations

FDA recommends that establishments consider the severity of each observation identified in the FDA 483 and prioritize corrective actions accordingly. The guidance also notes that establishments should examine past inspections and internal audits for repeat observations and trends. FDA notes that a Form 483 does not include an exhaustive list of all deficiencies that may be present at an establishment.

To fully understand and assess the observations, FDA notes that an establishment should fully understand the observations and assess related risks to product quality and patient safety, taking timely and appropriate actions based on the risk assessment. FDA also recommends that responsible officials be notified of potential inspectional observations during the. Establishment management should also consider whether adequate resources have been committed to addressing the observations and creating and maintaining a functioning quality system.

FDA further recommends that establishments develop an investigation plan and include a detailed protocol and methodology. This includes a thorough investigation of issues, a risk assessment, determining root causes and considering how to improve the quality system.

Finally, FDA recommends developing and implementing a CAPA plan and evaluating CAPA effectiveness. A CAPA plan should be developed during or immediately after the inspection to address issues underlying the observations and should be updated as the establishment thoroughly investigates issues. The CAPA plan should address root causes and include a communication plan with steps towards completion, timeline and deliverables. There should also be an adequate effectiveness check to ensure that the actions taken successfully address the issues and root causes of the identified observations. FDA recommends a monitoring system to track CAPA effectiveness.

Resolving Disagreements with FDA

FDA notes that there may be disagreements related to scientific or technical issues during an FDA inspection. FDA encourages establishments to seek clarification during the inspection. If the disagreement is not resolved before the issuance of an FDA 483, establishments should communicate concerns in the FDA 483 response, including contested facts with supporting data and information to permit FDA to evaluate the issue. An establishment may contact the FDA Ombudsman with additional concerns.

Next Steps

FDA has provided until May 8, 2026, to provide comments on the Draft Guidance.

Categories

Pharmaceuticals | Regulatory | Food and Drug Administration (FDA)

Life Sciences | Biotechnology | Biologics

Subscribe to the Eye on FDA Blog Series >