According to the FDA OOS Draft Guidance, repeat testing until a passing result is obtained (i.e., testing into compliance) is objectionable under the cGMPs.

If the compendia do not define retest criteria, the decision to retest shall be made by Q.A. management and must be based on a sound scientific rationale. A retesting protocol should be created and approved by laboratory supervision prior to any retesting.

The retest protocol must be based on the specific problem identified, the history of the product, the method, the batch/lot used, and any applicable compendial requirements.

The retest protocol must also delineate the number of retests to be performed. The number of retests to be performed may vary, but this number should be based upon sound scientific reasoning. When sufficient sample is available, retesting must be executed using the same sample set that was the source of the original OOS test result, unless there is scientific rationale for not using this sample.

The retest plan must also include a control lot to be used to verify the accuracy of the analyses and the acceptance criteria for the control lot must be specified.

Microbial limit retests may use up to a maximum amount of 25 grams for a solid sample or 25 ml for a liquid sample.

The value of retesting during a microbiological OOS investigation is fairly limited in scope. Retesting may be performed only to corroborate or confirm the original OOS test result. If the retest results *do confirm* the initial OOS test result, this data can be used to support the case that the initial OOS test result is valid and not due to laboratory contamination. A confirmed OOS test result will cause the rejection of the test article (unless approved for reprocessing).

If the retest results *do not confirm* the initial OOS test result, the data can be used to only *help support* the claim that the initial OOS test result is invalid and attributable to laboratory contamination. Retest results alone cannot be used to invalidate the initial OOS test result. Only a clearly identified assignable cause can invalidate the initial OOS test result.

The FDA OOS Draft Guidance also states that if no laboratory errors are identified in the initial test, then there is no scientific basis for invalidating the initial OOS test result in favour of the passing retest result.

Microbiological retesting is significantly different to the retesting conducted during analytical method laboratory investigations.

First, analytical method retesting requires a minimum of five retests for formulated products (e.g., in process and finished product samples) and a minimum of three retests for other samples types (e.g., raw materials, API).

Second, analytical laboratory investigation retest results can be utilized to overcome the initial OOS test result after evaluation by Q.A. management. For example, if the

 