



FDA Now Has a Playbook for Responding to a Form 483

Kishore Hotha, PhD, MBA

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Why You Should Care

- This is the first time FDA has formally told manufacturers what a 483 response should look like.
- Your response may be the primary factor in whether FDA issues a Warning Letter.
- It applies to all CGMP inspections — routine, for-cause, preapproval — across CDER, CBER, and CVM.
- 503B outsourcing facilities and combination products are included.

**Until now, there were no written rules.
Now there are.**



The 15-Day Window

Within 15 business days:

- FDA will review before deciding next steps
- Submit one consolidated response
- Cover all observations in a single package

After 15 business days:

- FDA will not delay regulatory action
- Warning Letters may come without review

Complex observations?

- Submit CAPA plan within 15 days
- Include interim measures + follow-up plan





Response Format Gaps

X No standard format

✓ FDA NOW EXPECTS:

Table of contents, executive summary with CAPA tracking, numbered observations, signed attachments

X QA head signs the response

✓ FDA NOW EXPECTS:

Executive management with resource authority must sign. Site heads and quality unit heads may co-sign

X Piecemeal responses over weeks

✓ FDA NOW EXPECTS:

Single consolidated response within 15 days. For complex items, submit CAPA plan with timeframes





Investigation & CAPA Gaps

X Surface-level root cause

✓ FDA NOW EXPECTS:

Multiple hypotheses required. Investigate each. Verify with science. Minimize bias in evaluation

X Scope limited to cited items

✓ FDA NOW EXPECTS:

Expand to all associated drugs, processes, facilities, contract orgs. Check past inspections for trends

X CAPA effectiveness = retesting

✓ FDA NOW EXPECTS:

Must go beyond routine sampling. If CAPA fails, revisit root cause — it may be wrong or incomplete



6 Things You're Probably Not Doing

1. Communication plan with milestones and follow-up reports to FDA
2. Engaging a consultant specifically for data integrity observations
3. Risk-assessing distributed drugs still within expiry
4. Addressing verbal discussion items in your written response
5. Asking why your quality unit didn't catch this before FDA did
6. Filing Field Alert Reports separately from your 483 response



Every 483 Response Needs:

- 1 Establishment identity with FEI number
- 2 Copy of the FDA 483
- 3 Preparer and signatory identification
- 4 Executive management signature
- 5 Consultant authorization letters (if applicable)
- 6 Investigation plans, reports, and root cause analysis
- 7 Executive summary table with CAPA tracking
- 8 Patient and product risk assessment
- 9 Detailed responses with effectiveness evaluation plans



Bottom Line

If you're already doing this well, this guidance validates your approach.

If you're not — this is your roadmap.

And FDA will be measuring you against it.

The shift:

From "send us what you have"
to "here's what credible looks like."

[Draft Guidance Available on FDA.gov](#)



Kishore Hotha

Dr. Hotha's Life Sciences LLC