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STANDARDS & GUIDANCE BRIEF · UNITED STATES · REGULATION

21 CFR Part 4

Regulation of Combination Products

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ISSUED BY	US Food and Drug Administration	PREPARED BY	Conner Davidson
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INDUSTRIES	Pharmaceutical, Medical Devices	ONLINE	qesisbest.com/standard-21-cfr-4.html

IN FORCE Subpart A was updated with the QMSR so that its device provisions refer to the new Part 820.

What It Covers

How CGMP and postmarketing safety reporting apply to products that combine a drug, a device and/or a biological product, so a single manufacturing system can satisfy each constituent's requirements.

Who It Applies To

Manufacturers of combination products such as prefilled syringes, drug-eluting stents, and autoinjectors.

Key Requirements

- A streamlined approach: operate under drug CGMP or the device quality system, then add the specified provisions of the other (§4.4).
- Under a drug-based system, add device design controls, purchasing controls, CAPA, and related provisions; under a device-based system, add the listed drug CGMP provisions such as testing and stability.
- Subpart B: postmarketing safety reporting that combines the constituent parts' reporting duties.

What an Auditor Asks to See

- Which approach you chose, and the procedures that implement the added provisions.
- Design control files for the device constituent.
- Reporting decisions that consider both drug and device reporting rules.

Where Systems Fall Short

- Device and drug systems run in parallel, with the joins between them owned by nobody.
- Design controls applied to the device part only after a problem forced it.

How QES helps. Reconciling the two systems into one, with the added provisions written into the procedures people actually use. See the gap assessment: qesisbest.com/services.html#gap-assessment · +1 (401) 246-3204 · mweeden@qesisbest.com

Sources, checked October 24, 2026. eCFR — 21 CFR Part 4 — www.ecfr.gov/current/title-21/part-4.

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