

been, the types of deficiencies if there were any, and the types of items we were inspecting them for.

Conversely, before we go on the survey, we touch base with them, too. So although there has not been this formal list sent out as in the past, we have covered this in every way.

Senator NELSON. How many inspectors do you have in DOD?

Mr. FEINBERG. In 1970 we had 48 DCAS inspectors.

Senator NELSON. Forty-eight what?

Mr. FEINBERG. Forty-eight drug inspectors who were inspecting drug plants and products for us, but these 48 operate on a part-time basis. They inspect other commodities for DSA, and as the statement indicated, about twenty man-years are spent in inspection for drugs.

Senator NELSON. Annually?

Mr. FEINBERG. Yes, annually.

Senator NELSON. Is there any particular advantage in having the FDA have its inspectors inspecting plants and the Veterans' Administration having its inspectors and the Department of Defense having its inspectors? Or to put it another way: Is there any reason why they shouldn't all be in the FDA?

Mr. FEINBERG. Well, Mr. Nelson—

Captain MACPHERSON. If I might, Mr. Nelson, there appears to be a difference in the philosophy involved concerning the approach to inspection and quality control by the two agencies. FDA's inspections are plant-oriented and ours are product-oriented.

Should FDA determine a plant to be in violation of good manufacturing practices, recourse would be through legal channels. When we inspect a plant, we look not only at the physical layout but the equipment and the personnel and the quality control in relation to a specific product which we are going to buy. The plant may be manufacturing a number of items in an acceptable manner except for the one product in which we have interest and this could be the cause for our rejection.

We as a contractual agency attempt to prevent the introduction into our system of defective medical material. FDA as a regulatory agency removes from commerce any material that it determines to be ineffective or defective at some time after it has reached the market place.

Senator NELSON. You inspect only for purposes of purchasing under a particular proposed contract?

Mr. FEINBERG. Yes, sir.

Senator NELSON. And do you inspect every time you are making a purchase?

Mr. FEINBERG. Well, our policy on that, sir, is that if a company had previously successfully supplied the item or the company is one which we know has the capability to produce the item, we do not perform an inspection for qualification of the company. Of course, we have product inspection when the material is manufactured and before it is accepted. Relocation, yes. But where a company is inspected and found to have minor deficiencies, we indicate what the corrections must be and if they show a desire to make these corrections, we will attempt to delay the procurement until they make these corrections and we can verify it.