

## FDA Determined Cause Classifications†

Determined Cause	Classification	FDA Determined Cause
Component change control	<i>Other/Under Investigation</i>	Other
Component design/selection		Pending
Control/		Under Investigation by firm
Device Design		Unknown/Undetermined by
Controlled device change control	<i>Packaging</i>	Package design/selection
Employee error		Packaging
Process error		Packaging change control Packaging process control
Equipment maintenance	<i>Process</i>	Process change control Process control†
Defect in labeling		Process design
Labeling Change Control	<i>Software</i>	Software change control
Labeling design		Software design
Labeling False and Misleading		Software design (manufacturing)
Labeling mix-ups		Software design (manufacturing)
Labeling incorrect or no expiration date		Software Design Change Software in the Use Environment Software Manufacturing/Software Deployment
Contaminating Material/Component	<i>Radiation Control for Health and Safety Act</i>	Radiation Control for Health and Safety Act
Manufacturing material removal		
Material/Component Contamination		
Build-up of materials/components		
Use of Material/Component prior to receiving test results		
Quality control processes used within quality management systems (QMS) to ensure that changes to a product or system are introduced		

Developing, conducting, controlling, and monitoring production processes to ensure that a device conforms to its specific characteristics. Determined causes were omitted, as 0% of ROD recalls and <0.4% of other device recalls cited them: Counterfeit, Environmental, Storage, Vendor change control