

---

# Removing the Ambiguity from Business Governance Documentation Using SBVR

---

Donald Chapin

Business Semantics Ltd

London UK

[www.BusinessSemantics.com](http://www.BusinessSemantics.com)

*Bridging Work and Systems with the Language of Business*

# Topics

- BUSINESS PROBLEM: *Ambiguous* Management & Product Policies and Documentation
- TASK: “Assemble a Glossary of Terms for a specific use that is complete and consistent with all other company Glossaries”
  - Existing Situation & Problems Faced
  - Using SBVR-based “Community-Managed Terminology” to solve the problems
    1. CAUSE OF AMBIGUITY: No Authoritative Source of Terms & Definitions
    2. CAUSE OF AMBIGUITY: One Noun Phrase – Two Meanings
    3. CAUSE OF AMBIGUITY: One Noun Phrase – One Meaning – Two Synonymous Definitions
  - Business value generated
- TASK: “Make quality policies clear, understandable, usable and unambiguous”
  - Existing Situation & Problems Faced
  - Using an SBVR tool with “Rigorous Definitions and Policy/Rule Statements” to solve the problems
    4. CAUSE OF AMBIGUITY: Obvious Missing Definitions
    5. CAUSE OF AMBIGUITY: Poor Quality Definitions
    6. CAUSE OF AMBIGUITY: Inadequate Use of Grammar and Logic Words
    7. CAUSE OF AMBIGUITY: Lack of Rigor in Definitions & Policy/Rule Statements
    8. CAUSE OF AMBIGUITY: Misuse of Terms in Business Governance Documentation
  - Business value generated
- APPENDIX: “Business Value Generated by Re-use of Community Managed Terminology & Policy/Rules”

---

## **BUSINESS PROBLEM: Ambiguous Management & Product Policies and Documentation**

---

President of 40,000 person world-wide manufacturing business unit issues directive:  
***“Get the ambiguity out of our policies and process documentation”***

---

**‘NEED to DO’:**

**Assemble a Glossary of Terms for a Specific Use that is Complete and Consistent with all other company Glossaries**

---

Community Managed Terminology

# John Smith was Looking for a Comprehensive Glossary for the New ABC System

- PRESENT SITUATION - What he found:
  - No way to know all the glossaries that exist
  - No official list of staff responsible for the contents of a glossary
  - Multiplicity of separately located glossaries  
(possibly one for each management process)
  - Major inconsistencies in the ones he knew about (Quality Glossary vs. SAP Glossary) e.g. significantly different definitions for:
    - Material, Deviation, Shelf Life
    - Good Manufacturing Practice, Standard Operating Procedure
    - Supplier, etc.
  - A compliance audit risk of having different definitions for terms which cause different interpretations of policies and procedures.
  - No easy way to compare and/or integrate different glossaries

# How John has to Deal with these Problems Currently

- Never was able to be sure he found all the significant glossaries in use in the company and spend a lot of time trying
  - Went to various websites to find them
  - Talked to people to find them
- Suspects that inconsistencies still remain
  - No overall coordination to make sure glossaries are consistent
- Compliance risk remains open
  - any inconsistency will potentially lead an auditor to follow that inconsistency
- No easy way to find and resolve all the inconsistencies
  - Manual effort
  - Mostly inconsistency in terms rather than problems with the definitions
    - The 'discrete meaning' centred approach of the "Semantics of Business Vocabulary and Business Rules" standard provides the basis for this

# Engineering Design Glossary of Terms

	equipment operation
<b>Operating Range</b>	The validated acceptance criteria within which a control parameter must remain, wherein acceptable product is manufactured
<b>Operational Qualification (OQ)</b>	Documented verification that all the component systems or subsystems perform as <u>specific intended</u> throughout representative or anticipated operating ranges.
<b>OSD</b>	Oral Solid Dosage
<b>OTC</b>	Over The Counter – <u>Finished product that can be obtained without a prescription or without total control of a pharmacist, physician or other healthcare professional</u>
<b>P&amp;ID<del>s</del></b>	Piping and Instrument Diagrams
<b>PA</b>	Public Address
<b>PC</b>	Personal Computer
<b>Performance Qualification(PQ)</b>	<u>A documented programme to demonstrate that an operation, when carried out within defined parameters, will consistently meet predetermined acceptance criteria. Documented verification that the process and/or the total process-related system performs as intended throughout all anticipated operating ranges</u>
<b>PFC</b>	Power Factor Correction
<b>PFD</b>	Process Flow Diagram
<b>PLC</b>	Programmable Logic Controller
<b>PLC Controlled Automation System</b>	Any automated system that has a Programmable Logic Controller as its primary controller
<b>Potable water</b>	Normally associated with water that is suitable for human consumption.
<b>Potent</b>	A substance which is "active" in relatively low doses or concentrations
<b>Prescriptive</b>	Prescriptive - An instruction that must be complied with completely
<b>Process Support Systems</b>	Systems which directly support the process operations
<b>Process Systems</b>	Systems which are either in contact with the drug substance in its purified or unpurified state, or in contact with the materials that will ultimately become, or be in contact with, the drug substance
<b>Process Validation</b>	Establishing documented evidence which provides a high degree of assurance that a specific process will consistently produce a product meeting its pre-determined specifications and quality characteristics – <u>see also Performance Qualification.</u>
<b>Process Validation Protocol</b>	Documented plan for testing a pharmaceutical product that confirms that the production process used to manufacture the product performs as intended. This includes a review of process variables and operational limitations as well as providing the sampling
<b>Product Mix</b>	The types and number of different products produced in a facility
<b>Protocol</b>	A prospective plan that when executed as intended produces documented evidence that a Process or System has been properly qualified



# Packaging Management Terms Log

A		B
1	Term	Description
87	Overprint	Additional information applied to the packaging material at the time of production e.g. batch number, registration number.
88	Pack	A pack is made up of a product and the packaging components that protect its integrity, e.g. a bottle of tablets, with a leaflet, in a carton. Many cartons may also be packed into a case (outer) for transportation. (See Packaging Component)
89	Pack Brochure	Regional document produced by a site with input from the team. A Pack Brochure provides information to markets on the packaging options available for a particular region/pack type.
90	Pack Catalogue	The global electronic repository of packaging-related documents. These include BODs, artwork files, technical specifications, pack brochures and Pack Graphic Design Templates, market intelligence documents and forms.
91	Pack Change Analyst (PCA)	An role for an individual based at a Regional Service Centre, who is responsible for controlling the progress and completion of changes.
92	Pack Change Item	This refers to the uniquely identified Change Request Item
93	Pack Change Request Form	The paper based form to be used for requesting changes to items in the GPM system when the user has no access to system
94	Pack Change Request (PCR)	A specific type of Change Request used when an existing packaging component is to be modified. Previously known as a Pack Amendment Order (PAO).
95	Pack Graphic Design Template (PGDT)	Pack template without market specific information - at Component level
96	Pack Owner	"Market" that owns the text and graphics for a pack and can submit changes to a pack
97	Pack Request Form (PRF)	A standardised template form used to capture the information necessary to create a new pack. (Previously known as an NPR)
98	Pack Technologist	A person who specialises in packaging technology.
99	Packaging Component	A component that is used to protect the integrity of the product, identify the product and transport the product, many of which can be used to assemble a pack. These could be moulded, embossed, or printed components.
100	Packaging Item	An item that is used to protect the integrity of the product e.g. bottle, carton
101	Packing site	A or third party contractor where packaging of products takes place.
102	Page-Description Language (PDL)	Software that resides within a printer and defines how elements such as text and graphics appear on the printed page. PostScript is the industry-standard page-description language.
103	Parent	A parent is a document that contains one or more children (sub documents). For example, a native artwork file (the parent) has sub files (the children), such as a logo file, linked to it.
104	PDF	A universal file format that preserves all the fonts, formatting, colours and graphics of any source document, regardless of the application and platform used to create it.
105	PDL	See Page-Description Language (PDL).



# SAP User Documentation Glossary

## 1.16 P

Term	Acronym	Definition
Pack Catalogue		A catalogue that contains sufficient information for the requestor to select the required pack presentation to be supplied to a particular market.
Pack Copy		Text, logos, pictures which together form the artwork for the printed components.
Pack Variant		A request from the customer for an additional pack presentation to the existing pack range or a modified product specification to that already registered. One of the following: <ul style="list-style-type: none"><li>• A presentation of a finished pack not currently available.</li><li>• An exception to the manufacturing strategy, e.g. a semi-finished pack that is to be completed somewhere other than the supplying site.</li></ul>
Packing (PE)		Packing is part of delivery and shipment processing. When a delivery is processed, delivery items can be selected for packing and assigned to Handling Units.

# Environment Health & Safety

## Glossary of Terms

Choose an Initial:

Keyword

### **Packaging (noun)**

Includes both primary packaging and secondary packaging. Primary packaging typically consists of glass bottles and vials; metal cans, tubes and aerosol cans; plastic bottles, vials, blisters, pouches and tubes. This inner package is primarily responsible for maintenance of product stability, strength, purity, quality and efficacy. Secondary packaging typically consists of paperboard cartons and plastic containers, bottles or jars. This secondary package provides information and protection during delivery and transit.

### **Packaging (verb)**

All activities, including dispensing of packaging components, filling and labelling, that a bulk product or filled product has to undergo to become a finished product.

### **Penalty**

a sanction against an operation; sum of money to be forfeited in case of non-fulfilment of stipulations.

### **Permanent Transfers**

Occasionally, an employer may need to permanently transfer an employee to another area or work environment, because the occupational injury resulted in a permanent disability. This disability has made it impossible for the employee to carry out his normal job. If a job can be found in the company that can accommodate the disability, the employee may be permanently transferred to a new position or type of job.

### **Permit System**

A written procedure for preparing and issuing permits and identifying the hazards present and the controls required for entry, and for returning the confined space to service following termination of entry.

### **Permit-to-work**

Written authorisation to undertake a specific task, which documents the precautions put in place, the residual risks and any special control measures to be taken during the work.

# Quality Glossary

**product** or the manufacturing environment, which fails to meet specifications or criteria.

## **Over the Counter (OTC) Product**

**Finished product** that can be obtained without a prescription or without total control of a pharmacist, physician or other healthcare professional.

## **Packing**

All **operations**, including dispensing of **packaging components**, filling and labelling, which a **bulk product** or **filled product** has to undergo to become a **finished product**.

Also known as: Packaging.

See also: Primary, Bulk and Secondary Packing.

## **Packing Record**

See **Batch Record**.

## **Parallel Importation**

The practice of taking advantage of lower prices in certain countries by importing products into other countries and selling for profit. Hence the products may be described as being imported in 'parallel' to the distribution network.

## **Percentage Production Yield**

Ratio of the **actual yield** to **theoretical yield**, stated as a percentage.

---

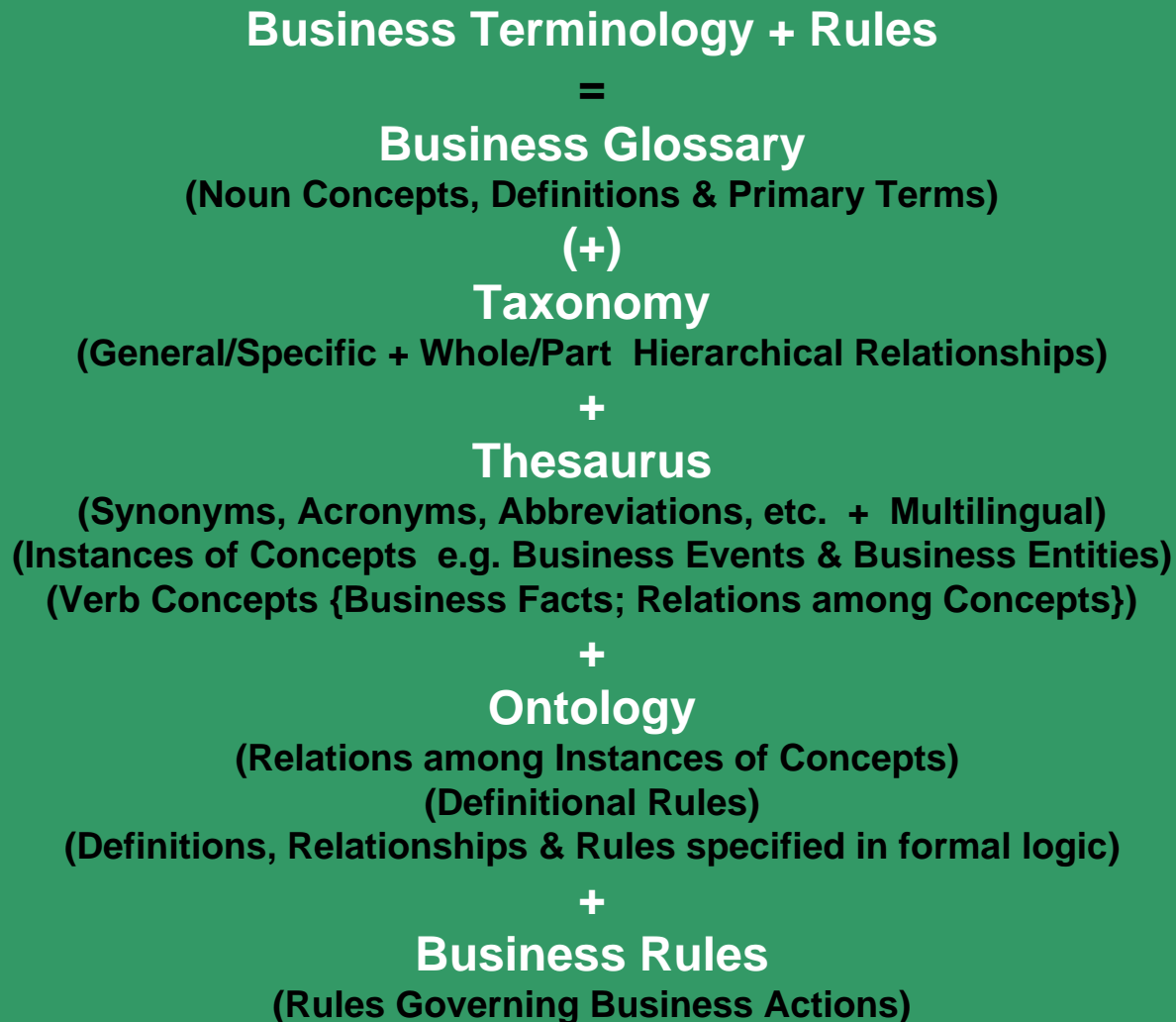
**Using SBVR-based  
“Community-Managed Terminology” to  
Solve the Problems**

---

Removing Causes of Ambiguity

## Business Community-Managed Terminology & Policy/Rules

### **‘Business Terminology + Rules’ -- What is it?**





# 1. No Authoritative Source of Terms & Definitions

Vocabulary Name	Shared-Meaning Community Name	Shared-Expression Community Name
Design Glossary of Terms - in English	Engineering Professionals	Engineering Professionals - English Speaking
DFM Glossary - in English	Engineering Professionals	Engineering Professionals - English Speaking
EHS (Environment, Health & Safety) Glossary - in English	EHS Professionals	EHS Professionals - English Speaking
Manufacturing Vocabulary - in English	Manufacturing Professionals	Manufacturing Professionals - English Speaking
GPM Terms Log - in English	Pack Management Professionals	Pack Management Professionals - English Speaking
Internal+External General Vocabulary -- in English	Staff & Stakeholders	Staff/Stakeholders - English-Speaking
IQM Manager's Handbook Glossary - in English	Development Professionals	Development Professionals - English Speaking
(IT) Glossary - in English	IT Professionals	IT Professionals - English Speaking
MERPS User Documentation Glossary - in English	MERPS Users	MERPS Users - English Speaking
Oxford English Dictionary	English Speakers	English Speakers
Quality Management Vocabulary - in English	Quality Professionals	Quality Professionals - English-Speaking
Training, Learning & Development Vocabulary - in English	Quality Professionals	Quality Professionals - English-Speaking
SBVR Common Vocabulary - in English	SBVR (OMG Specification) Professionals	SBVR Professionals (OMG Specification) - English-Speaking
SBVR Test Vocabulary	SBVR (OMG Specification) Professionals	SBVR Professionals (OMG Specification) - English-Speaking

Alpha list of all  
Vocabularies

Internal & external  
communities that shared the  
understanding of the meaning  
of the Subjects identified in the  
Vocabularies

# 1. Community Managed Terminology & Policy

Semantic Community Name

Quality Community

Uses LANGUAGE as Core  
Language Name English

Each Shared-Meaning Community has a 'core' language in which its Subjects are defined & named

Meanings (Subject Identities) are owned by a Shared-Meaning Community (e.g. Quality Professionals)

Subject = SBVR 'thing'

This overall management structure works for all kinds of Subjects: concepts, entities, facts, policy, rules, questions, text

Vocabularies are packaging units for publishing a set of Subject Entries for a given audience and purpose (e.g. Quality Glossary)

A Subject has no meaning to people outside a given Shared-Meaning Community unless the community to which they belong 'adopts' the definition of the subject

Primary Subject Name and Synonyms for a given Meaning (Subject Identity)

SPEECH COMMUNITY  
Owns SUBJECT REFERENCE

Another Meaning (Subject Area) can provide the Context for making the Subject Name unique within a given Shared-Meaning Community

Description	Subject	Type of Subject	Primary	Expression
Definition: Apply an API or finished product from the receipt, acceptance and dispensing of all starting materials, raw materials, and components.	70	Noun Concept	<input checked="" type="checkbox"/>	manufacturing
Definition: A document stating the materials used and the operations carried out during the processing of a given batch of API, intermediate product, bulk product or finished product.	74	Noun Concept	<input checked="" type="checkbox"/>	batch production record
Definition: A document stating the materials used and the operations carried out during the processing of a given batch of API, intermediate product, bulk product or finished product.	76	Noun Concept	<input type="checkbox"/>	batch
Definition: An API or finished product.	200	Noun Concept	<input type="checkbox"/>	product
Definition: A Product Incident is an event or finding that might affect the safety, purity and efficacy of a product.	203	Noun Concept	<input type="checkbox"/>	product incident
Definition: the product incident has an impact on the product.	204	Verb Concept	<input type="checkbox"/>	product incident has an impact on the product
Definition: The elements of safety, purity and efficacy which ensure that there is no risk to the user.	205	Verb Concept	<input type="checkbox"/>	product incident has an impact on the product
Statement: a validation protocol including a validation check must be applied to a document which details the requirements for validation check.	208	Rule	<input type="checkbox"/>	validation protocol includes validation
Definition: a document which details the requirements for validation check.	210	Noun Concept	<input type="checkbox"/>	validation check
Definition: Making a comparison, such as the daily check of a balance.	218	Noun Concept	<input checked="" type="checkbox"/>	validation check
Definition: a validation check is one of the components of a validation protocol.	219	Verb Concept	<input checked="" type="checkbox"/>	validation protocol includes validation

Language Name
English
French
German

Vocabulary Name	Vocabulary Purpose
English Quality Management Vocabulary	
English Training, Learning & Development Vocabulary	

Grammatical Unit	Expression	Primary	Subject	Identity Description
Word / Phrase	<a href="#">manufacturing</a>	<input checked="" type="checkbox"/>	70	Any or all operations to prepare, control and supply API or finished product from the receipt, acceptance and dispensing of all starting materials, raw materials, and components.
Word / Phrase	<a href="#">batch production record</a>	<input checked="" type="checkbox"/>	74	A document stating the materials used and the operations carried out during the processing of a given batch of API, intermediate product, bulk product or finished product.
Word / Phrase	<a href="#">production batch record</a>	<input type="checkbox"/>	74	A document stating the materials used and the operations carried out during the processing of a given batch of API, intermediate product, bulk product or finished product.
Word / Phrase	<a href="#">batch manufacturing record</a>	<input type="checkbox"/>	74	A document stating the materials used and the operations carried out during the processing of a given batch of API, intermediate product, bulk product or finished product.

# 1. Package Partial Vocabularies for Specific Purposes

Vocabulary Name: Regulatory Inspection Management Process Glossary-in English

Vocabulary Code: [ ]

Vocabulary Purpose: [ ]

Is expressed in LANGUAGE: English

Belongs to SHARED-EXPRESSION COMMUNITY

Part of SHARED-MEANING COMMUNITY

Shared-Meaning Community: Quality Professionals

Shared-Expression Community: Quality Professionals - English-Speaking

Term	Unit of Text	Is Primary Subject ID	Type of Subject Name	Subject No	Definition / Description
batch	Word / Phrase	<input checked="" type="checkbox"/>	Noun Concept	76	A stated quantity of material, API or finished product which
batch production record	Word / Phrase	<input checked="" type="checkbox"/>	Noun Concept	74	A document stating the materials used and the
batch quality control record	Word / Phrase	<input type="checkbox"/>	Noun Concept	424	The original analytical test results, data summary and

Name of the specific purpose glossary

The Community that owns the meanings

List of Subjects selected for inclusion in this specific purpose glossary – NO new definitions – just a selection

The Community that this specific purpose glossary is created for (for inclusion in the "Regulatory Inspection Management Process")

Targets SHARED-EXPRESSION COMMUNITY

Part of SHARED-MEANING COMMUNITY

Shared-Meaning Community: Quality Professionals

Regulatory Inspection Community - English Speaking

- Package partial vocabularies for specific purposes,
  - but have one central location for
    - definitions of meanings
    - terms / names



## 2. One Noun Phrase – Two Meanings

Text	Form of Text Name	Text	Primary Subject ID	Subject No	Type of Subject Name	
a validation protocol including a validation check must be	Sentence		<input checked="" type="checkbox"/>	208	Rule	a validation protocol including a validation check must
accuracy check	Word / Phrase		<input type="checkbox"/>	218	Noun Concept	Making a comparison, such as the daily check of a ba
adverse event	Word / Phrase		<input checked="" type="checkbox"/>	757	Noun Concept	Any untoward medical occurrence in a patient or clinic
batch	Word / Phrase		<input checked="" type="checkbox"/>	76	Noun Concept	A stated quantity of material, API or finished product w
batch manufacturing record	Word / Phrase	manufacturing	<input type="checkbox"/>	74	Noun Concept	A document stating the materials used and the operati
batch production record	Word / Phrase		<input checked="" type="checkbox"/>	74	Noun Concept	A document stating the materials used and the operati
batch quality control record	Word / Phrase		<input type="checkbox"/>	424	Noun Concept	The original analytical test results, data summary and e
date/time	Word / Phrase		<input checked="" type="checkbox"/>	601	Noun Concept	day plus time of day
date/time1 is before date/time2	Clause		<input checked="" type="checkbox"/>	222	Verb Concept	date/time1 is before date/time2
House	Word / Phrase		<input checked="" type="checkbox"/>	206	Physical Thing	a commercial building that is located on the Northwest
's acquisition of : Research Institute	Word / Phrase		<input checked="" type="checkbox"/>	207	Specific Intangible	legal transaction for the purchase of the Resea
manufacturing	Word / Phrase		<input checked="" type="checkbox"/>	70	Noun Concept	Any or all operations to prepare, control and supply an
operational qualification	Word / Phrase		<input checked="" type="checkbox"/>	908	Noun Concept	A documented demonstration that equipment, facilities
performance qualification	Word / Phrase		<input checked="" type="checkbox"/>	863	Noun Concept	A documented programme to demonstrate that an ope
performance qualification	Word / Phrase		<input checked="" type="checkbox"/>	869	Noun Concept	Documented verification that the integrated system fur
product	Word / Phrase		<input checked="" type="checkbox"/>	200	Noun Concept	An API or finished product.
product incident	Word / Phrase		<input checked="" type="checkbox"/>	203	Noun Concept	A Product Incident is an event or finding that might affi
product incident affects product	Clause		<input checked="" type="checkbox"/>	204	Verb Concept	the product incident has an impact on the product
product is affected by product incident	Clause		<input type="checkbox"/>	204	Verb Concept	the product incident has an impact on the product
product quality	Word / Phrase		<input type="checkbox"/>	205	Noun Concept	The elements of safety, purity and efficacy which ensu
production batch record	Word / Phrase		<input type="checkbox"/>	74	Noun Concept	A document stating the materials used and the operati
start date/time	Word / Phrase		<input type="checkbox"/>	214	Noun Concept	date/time at which period begins
test term	Word / Phrase	adverse event	<input type="checkbox"/>	805	Noun Concept	Test Definition
validation check	Word / Phrase		<input checked="" type="checkbox"/>	218	Noun Concept	Making a comparison, such as the daily check of a ba
validation check begins	Clause		<input checked="" type="checkbox"/>	221	Verb Concept	the event at which the validation is started
validation protocol	Word / Phrase		<input type="checkbox"/>	210	Noun Concept	a document which details the requirements for validati
validation protocol includes validation check	Clause		<input type="checkbox"/>	219	Verb Concept	a validation check is one of the components of a va
validation protocol is approved	Clause		<input checked="" type="checkbox"/>	220	Verb Concept	the validation protocol is in an 'approved' state

### 3. One Noun Phrase - One Meaning - Two Synonymous Definitions

Understood by SHARED-MEANING COMMUNITY  
 Shared-Meaning Community:  Subject No:

Is TYPE OF SUBJECT  
 Type of Subject Name:

Is a VERB CONCEPT  
 Verb Concept No.:  Verb Phrase:

Is a DIRECTIVE  
 Directive No.:

Concept Example:   
 Subject Description:   
 Subject Purpose:   
 Dictionary Basis:   
 Subject Notes:

Plays role in VERB CONCEPT	
Role Order	Verb Concept No.
<input type="text"/>	<input type="text"/>

Known from DEFINITION / DESCRIPTION				
Is	Def / Desc Type	Definition / Description	Shared-Expression Community Name	Language Name
<input checked="" type="checkbox"/>	Definition	A documented demonstration that equipment, facilities and operations function as specified in the design qualification.	Quality Professionals -	English
<input type="checkbox"/>	Definition	Documented verification that the system or sub-system performs as intended throughout all anticipated operating ranges.	MERPS Users - English Speaking	English

Is Pointed to by NAME FOR SUBJECT				
Primary	Form of Text	Text	Shared-Expression Community	Text for Context
<input checked="" type="checkbox"/>	Word / Phrase	<a href="#">operational qualification</a>	Quality Professionals -	



# Value Generated in John Smith's Situation

- Time spent looking for glossaries and term definitions of all kinds eliminated
- Ability to deal with situations with consistency in making business decisions
  - Different meanings for the same word/phrase are unique, **and clearly so**, in different communities and/or contexts
  - Similar, but different meanings are clearly shown to be **specifically similar** and **specifically different**
- Business staff control the contents of business glossaries and how they relate to content of other business glossaries
- Ability to find and resolve inconsistencies and avoid duplication
- Minimized number of 'owned' definitions that have to be created and managed
  - through adoption of vocabulary concepts from other vocabularies
- Have a single consistent language resource for the whole of the company that can be easily deployed for new, unanticipated uses
  - E.g. the new vocabulary needed for ABC System

**For Value Contributed to Other Capabilities:  
see Appendix**

---

**‘NEED to DO’:**

**Make Quality Policies Clear,**

**Understandable, Usable and Unambiguous**

---

Terminology & Policy Authoring Assistance

# Tom Jones was given Responsibility for Removing Ambiguity from Quality Policies

- PRESENT SITUATION - What he found:
  - As a result of the problems at a local manufacturing facility, Tom Jones has been given the responsibility for improving Quality Management documentation.
  - One of the key Quality-related factors contributing to the problems at the plant was identified to be 'ambiguous policies & process documentation'
  - The removal of ambiguity from Quality policies must be completed rapidly and thoroughly
  - Initially identified causes of the ambiguity:
    - Woolly phrases (e.g. 'where applicable')
    - Terms missing from the Quality glossary
    - Multiple meanings for the same word/phrase (e.g. Batch Packing Record, Performance Qualification)
  - The Quality policies are to be made clear, understandable and usable, as well as unambiguous

# How Tom has to Deal with these Ambiguity Problems Currently

- Identify some 'ambiguous words commonly found in Quality policies (e.g. 'where applicable')
- Assign current authors to review each policy document they author to replace those words with specifics (e.g. the specific conditions of the 'where applicable')
- Very labour intensive and time critical
  - About 50 documents
  - About 70-80 ambiguous policy statements (initial assessment)
  - 35 policies to be completed in three months
- Manual task to identify and correct:
  - Policy terms missing from the Quality glossary
  - Conflicts between glossaries
- Some sources of ambiguity remain known and undetected

---

**Using an SBVR tool with “Rigorous  
Definitions and Policy/Rule Statements” to  
solve the problems**

---

Removing Additional Causes of Ambiguity



# 4. Obvious Missing Definitions

2.1.6 Adequate data applicable to each new product variant of strength, formulation, primary container and closure, ratio of product to headspace and pack size must be available to justify the shelf-life and storage conditions assigned. For finished products requiring constitution or dilution, or marketed in multi-dose containers, the in-use life of each new product variant must be justified. 5205 provides guidance on how to support the shelf-life.

Original Quality Policy Entry

AS automatically annotated based on the Quality Glossary

## 5205-2.1.5a1

Rule Statement:

Adequate data applicable to each new product<sub>1</sub> variant of strength, formulation<sub>2</sub>, primary container and closure, ratio of product<sub>3</sub> to headspace and pack size must be available to justify the shelf-life<sub>0</sub> and storage conditions assigned.

## 5205-2.1.5a2

Rule Statement:

For finished products requiring constitution or dilution, or marketed in multi-dose containers, the in-use life of each new product variant must be justified.

Note:

5205 provides guidance on how to support the shelf-life.



# 4. Obvious Missing Definitions

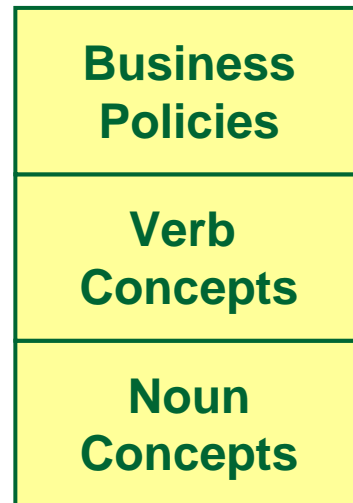
Apply the 'Business Rules Mantra':

**“Rules are built on Facts. Facts are built on Terms.”**

Base Business Policies  
on Verb Concepts

Associate Concepts to  
Define Verb Concepts

Define Concepts



## Policy Being Clarified

For finished products requiring constitution or dilution,  
or marketed in multi-dose containers,  
the in-use life of each new product variant must be justified.

## Undefined Verb Concepts

finished product requires constitution  
finished product requires dilution  
finished product is marketed in multi-dose container  
new product variant has in-use life  
in-use life is justified

## Undefined Noun Concepts

in-use life  
multi-dose container  
new product variant

# 4. Obvious Missing Definitions

Rule No.  Rule Effective Date  Rule Effective Time

a validation protocol *including* a validation check *must be approved before* the start date/time *of the* validation check.

Policy

## Is Built on VERB CONCEPT

Expression	Verb Concept	Identity Description	St
<u>product incident</u> <i>affects</i> <u>product</u>	1	the product incident has an impact on the product	2
<u>validation protocol</u> <i>is approved</i>	3	the validation protocol is in an 'approved' state	2
<u>validation check</u> <i>begins</i>	4	the event at which the validation is started	2
<u>validation protocol</u> <i>includes</i> <u>validation check</u>	8	a validation check is one of the components of a a validation protocol	2
<u>date/time</u> <sub>1</sub> <i>is before</i> <u>date/time</u> <sub>2</sub>	21	date/time1 is before date/time2	2

Verb Concepts that the policy is built on

## Verb Concept Role

Position	Expression	Identity Description
1	<u>product incident</u>	A Product Incident is an event or finding that might affect products in terms of quality, safety, marketability, or viability within the portfolio. This could include product complaints, recalls, withdrawals, negative publicity, or a
2	<u>product</u>	An API or finished product.

Noun Concepts that the first Verb Concept is built on

# 5. Poor Quality Definitions

- Good Definitions have a pattern
  - Closest 'more general concept', plus
  - 'Delimiting (distinguishing) characteristics'
  - Supplemented by:
    - Composition
    - Examples of instances
    - Examples of use of term
- Examples
  - **clinical safety issue**
    - CURRENT: Clinical Safety includes anything relating to human health and/or well being.
    - GOOD PRACTICE: issue about anything relating to human health and/or wellbeing
  - **gang printing**
    - CURRENT: When more than one type of label or carton is printed on a single sheet of material.
    - GOOD PRACTICE: printing of more than one type of label or carton on a single sheet of material

# 5. Inherent Taxonomy Found in Definitions

## Product

API or finished product.

## Bulk Product

finished product which *has completed* all manufacturing stages *up to, but not including, filling and* packing

## Filled Product

product which *has completed* all stages *of* manufacturing *up to the* stage *of* packing *in the final, immediate* container

## Finished Product

product which *has completed* all stages *of* manufacturing, *including final* packing,

## Over the Counter (OTC) Product

finished product *that can be obtained without a* prescription *or without total control of a* pharmacist, physician *or other* healthcare *professional*.

## Reject Product

product which *does not meet* its specifications, *or has not been made to* manufacturing process, *or has a* manufacturing problem, *or has reached* its expiry date, *and has been* sentenced *as being* unsuitable *for use or for* rework.

## Sterile Product

product which *has been* processed *to* ensure *that* there *is complete* absence *of living* organisms.

**There is a taxonomy  
(true meaning of the word)  
inherent in definitions  
based on the 'more general concept'  
at the beginning of the definition**

- **Product**
  - **Filled Product**
  - **Finished Product**
    - Bulk Product
    - Over the Counter (OTC) Product
  - **Reject Product**
  - **Sterile Product**



# 6. Inadequate Use of Grammar & Logic Words

## ■ Policy 1 (Inadequate Use of Logic Words

i.e. 'and', 'or', 'that', 'the', etc.)

- Ongoing monitoring studies **must be** operated according **to a** written procedure, which **must** ensure **that the** stability of every strength, formulation, primary container and closure, ratio **of** product to headspace and pack size **can be** assessed.

## ■ Policy 2 (Woolly Phrases)

- Attributes identified as indicative **of the** potential stability impact **of the** change **must be** investigated **and**, **where appropriate**, comparative accelerated data **or** in-use stability **following** constitution **or** dilution **must be** generated.

# 7. Lack of Rigor in Definitions & Policy Statements

2.1.5 Adequate data applicable to each new product variant of strength, formulation, primary container and closure, ratio of product to headspace and pack size must be available to justify the shelf-life and storage conditions assigned. For finished products requiring constitution or dilution, or marketed in multi-dose containers, the in-use life of each new product variant must be justified. 5205 provides guidance on how to support the shelf-life.

## 5205-2.1.5a1

Rule Statement:

Adequate data applicable to each new product<sub>1</sub> variant of strength, formulation<sub>2</sub>, primary container and closure, ratio of product<sub>3</sub> to headspace and pack size must be available to justify the shelf-life<sub>0</sub> and storage conditions assigned.

## 5205-2.1.5a2

Rule Statement:

For finished products requiring constitution or dilution, or marketed in multi-dose containers, the in-use life of each new product variant must be justified.

Note:

5205 provides guidance on how to support the shelf-life.

given a finished product<sub>1</sub>, requires constitution or the finished product<sub>1</sub>, requires dilution or the finished product<sub>1</sub>, is marketed in a multi-dose container<sub>2</sub>, the in-use life<sub>3</sub> of each new product variant<sub>4</sub> of the finished product<sub>1</sub>, must be justified.

given a finished product<sub>1</sub>, is marketed in a multi-dose container<sub>2</sub>, the in-use life<sub>3</sub> of each new product variant<sub>4</sub> of the finished product<sub>1</sub>, must be justified.

AS automatically annotated based on the Quality Glossary

As reworded by Policy Analyst using Rules Modeler

Separation into 2 items is temporary software limitation

# 7. Lack of Rigor in Definitions & Policy Statements

Object Browser / **Quantity of Pro...ilable Request\*** / Quantity on Hand Request / Reorder Threshold Update / Products Up for Reorder Request / quantity sold on date

Title

**Quantity of Product Available Request**

Statement

each **business actor**<sub>1</sub> may request whether a given **product**<sub>2</sub> has a **quantity on hand**<sub>3</sub> that is greater than or equal to a given **q**

Prompted with defined terms and names in the Business Vocabulary

- T quantities
- T quantity
- N Quantity of Product Available Request
- T quantity on hand
- N Quantity on Hand Constraint
- N Quantity on Hand Request
- N Quantity on Hand Update
- T quantity on hands
- T quantity sold on date
- T quantity sold on dates

Ability to remember which meaning was intended for terms that mean different things in different contexts

Annotation

# 7. Lack of Rigor in Definitions & Policy Statements

Object Browser / **Quantity of Pro...ilable Request\*** / Quantity on Hand Request / Reorder Threshold Update / Products Up for Reorder Request / quantity sold on date

**Title**  
**Quantity of Product Available Request**

**Statement**  
each business actor<sub>1</sub> may request whether a given product<sub>2</sub> has a quantity on hand<sub>3</sub> that is greater than or equal to a given q

**Annotation**

Wording and logic of rules validated in terms of the Business Vocabulary as you type with guidance and warnings of errors

Auto-complete 'pick-list' speeds up definition and ensures quality

- T quantities
- T quantity
- N Quantity of Product Available Request
- T quantity on hand
- N Quantity on Hand Constraint
- N Quantity on Hand Request
- N Quantity on Hand Update
- T quantity on hands
- T quantity sold on date
- T quantity sold on dates

- “Rules Modeler” Available as:**
- **Microsoft Word Add-in**
  - **Stand-alone Vocabulary-based Definition & Rule Statement Tool**

## 7. Lack of Rigor in Definitions & Policy Statements

- **Excipient** (original version in Quality Glossary)
  - Material used during manufacture of a finished product, which is not a raw material, API or packaging component.
  
- **Excipient** (version made rigorous by Rules Modeler)
  - a material<sub>1</sub> used during the manufacture<sub>2</sub> of a finished product<sub>3</sub> that is not a raw material<sub>4</sub> and is not an API<sub>5</sub> and is not a packaging component<sub>6</sub>

# 4. Holes & Inconsistencies found in Vocabulary Structure by Grammar-based Tool -- BEFORE

Apply the 'Business Rules Mantra':

**“Rules are built on Facts. Facts are built on Terms.”**

Base Business Policies  
on Verb Concepts

**Business  
Policies**

Associate Concepts to  
Define Verb Concepts

**Verb  
Concepts**

Define Concepts

**Noun  
Concepts**

## Policy Being Clarified

For finished products requiring constitution or dilution,  
or marketed in multi-dose containers,  
the in-use life of each new product variant must be justified.

## Undefined Verb Concepts

finished product requires constitution  
finished product requires dilution  
finished product is marketed in multi-dose container  
new product variant has in-use life  
in-use life is justified

## Undefined Noun Concepts

in-use life  
multi-dose container  
new product variant

# 7. Holes & Inconsistencies found in Vocabulary Structure by Grammar-based Tool -- AFTER

Apply the 'Business Rules Mantra':

**“Rules are built on Facts. Facts are built on Terms.”**

Base Business Policies  
on Verb Concepts

**Business  
Policies**

Associate Concepts to  
Define Verb Concepts

**Verb  
Concepts**

Define Concepts

**Noun  
Concepts**

## Policy Being Clarified

For finished products requiring constitution **or** dilution,  
**or** marketed **in** multi-dose containers,  
**the** in-use life of each new product variant must be justified.

## Undefined Verb Concepts

product has new product variant  
product requires constitution  
product requires dilution  
product is marketed in container  
product has in-use life

## Undefined Noun Concepts

container  
product



# 8. Misuse of Terms in Business Governance Documentation

Validation is a regulatory requirement that provides operational benefits in that reliable, understood and compliant facilities and processes form the basis for effective manufacturing and supply operations.

(Note the ambiguity of the use of 'supply' in the sentence and the definitions.)

validation:

a documented process that provides a high degree of assurance that a facility, laboratory, computer, process or system will consistently and reproducibly produce product, or perform to a predetermined specification

facility:

premises, equipment and utilities used in manufacturing

manufacturing:

any or all operations to prepare, control and **supply** an API or finished product from the receipt, acceptance and dispensing of all starting materials, raw materials, excipients or packaging components, through processing and packing, including in-process controls, testing and release activities, and dispatching from site

supply:

all activities after dispatch from site of manufacture to delivery of product to the customer

---

# Value Generated in Tom's Situation

- Minimized regulatory compliance risk
  - High degree of assurance that business policies and business processes are unambiguous to any audience
- Minimize the effort to create clear, unambiguous policies and the terminology that supports them
  - Good policy and terminology specification practices
  - Automated support
- Potential for automated policy consistency analysis

---

# Appendix

---

Business Value Generated by Re-use of  
Community Managed Terminology &  
Policy/Rules



# Community-based Terminology Direct Value

- Ability to prove to regulators that
  - the terms used in documents affecting compliance are clearly defined with a single meaning in any given context, and that
  - those definitions are widely available to all who have to interpret those document.
- Consistent usage and wide reuse enabled by a single place to find high quality business language resources that are:
  - Shared among members of the community whose terminology / set of rules they are
  - Clear, unambiguous, consistent and cohesive
- Maximized use of industry standard vocabularies for best communication with external stakeholders
- Improved quality of:
  - Thinking, Communication, Decision-making
  - Relationships, Collaboration & effectiveness
  - Writing & record-keeping
  - Knowledge sharing & re-use of Best Practice

---

# Terminology & Rules Authoring Assistance

## Direct Value

- Reduce the risk of misinterpretation and misapplication of governance and policy, both internally and by regulators.
- Consistent application and wide reuse enabled by a single place to find high quality business rules resources that are:
  - Shared among members of the community whose set of rules they are
  - Clear, unambiguous, consistent and cohesive
- Remove compliance loopholes caused by mis-interpretable or re-interpretable policy and rules
- Remove confusion caused by conflicting rules
- Eliminate duplicate rules that waste time by having to be taken into account
- Minimize gaps in rules where non-compliance could occur

# Value Contribution to other Business Capabilities

- “Strategic Text Analytics” Capability
- “Document Authoring Assistance & General Content Quality ” Capability
- “Business Subject-based Search / Query / Report Requests” Capability
- “Business Subject-based Content Alert” Capability
- “Business Semantics for IT Data” Capability
  - Provides business community agreed business semantics in the form of:
    - Subject definitions
    - The multi-lingual terms, synonyms, acronyms, abbreviations, names and identifiers used to refer to them uniquely within community contexts
    - The relationships between subjects to find similar or related meanings and their terms, etc.
    - Multi-lingual language pairs (word/phrase in each of two languages that mean the same thing)
- “Strategic Text Analytics” Capability
  - Eliminates significant detailed manual effort of putting business terms, synonyms, acronyms into the format required by the Strategic Text Analytics tools
  - Adds a large amount of intelligence and certainty to the text mining software so that it produces more accurate and insightful results



# Value Contribution to other Business Capabilities

- “Document Authoring Assistance & General Content Quality ” Capability
  - Provides rule specification capability for MS Office documents to verbalize clear rules in a formally defined way that make business policy actionable
- “Governance Content Quality” Capability
- “Regulatory Compliance” Capability
  - Provides the process and software ability to define a compliance terminology that is unambiguous; and that includes the important relationships between governance subjects and compliance contexts to enable:
    - Increased levels of compliance from ability to monitor for non-compliance events based on business rules resulting from interpretation of regulations
    - Earlier and more complete knowledge of non-compliance occurrences

# Value Contribution to other Business Capabilities

## ■ “Reference Data Reuse” Capability

- Where reference data in different IT systems already has the same meaning but uses different names, codes or identifiers,
  - enables the meanings and their multiple sets of names, codes and/or other identifiers to be documented and maintained once for the whole of the organization and used from that single source in any IT system
  - provides the basis for translating between the different sets of names, codes and/or other identifiers for the same meaning when passing data from one IT system to another
  - Enables such reference data to be integrated with the whole of the “Business Terminology/Rules Management Database” and used for text documents and all other business language resource purposes

## ■ “Business Semantics for IT Data” Capability

- Provides business community agreed business semantics that enables:
  - a single query for both structured data and unstructured text
  - creating of a catalogue of data available organized according to the business meanings in the Business Terminology/Rules Database
  - automatically transforming data from one form and/or set of codes to another

# Value Contribution to other Business Capabilities

- “Business Terminology/Rules-based Supplemental / Process-specific Application Rapid Prototyping to Production” Capability
  - Provides formally defined business terminology that can be used by tools for system designers to provide the business semantics for and, as needed, generate:
    - Database and other IT data structure designs
    - Screen and report definitions and/or code
  - Provides formally defined business rules that can be by used by tools for system designers to generate:
    - Execution rules for specific operational system rules engines
    - Code for methods in business object software components
  - Enables the “Business Terminology/Rules-based Supplemental / Process-specific Application Rapid Prototyping to Production” Capability (future) to:
    - Makes automation of business process task-specific data support feasible
    - Integrates legacy application data, packaged application data, and newly automated business process data
    - Makes it feasible to closes gaps both in data flow and ability to integrate and analyze data
  - Enables the “Predictive Analytics Rules Engine” Capability (future) to:
    - Makes potential implications of current facts and possible future scenarios explicit so they can be taken into account in decision making

# Value Contribution to other Business Capabilities

- 'Subject' Relationship Visualization
  - Visual knowledge map (network of all kinds of 'subject' relationships) that provides an intelligent inventory of our information assets enabling:
    - personal creative lateral thinking and discovery.
    - learning what you don't know about a 'subject' and how it relates to other 'subjects'.
    - more valuable knowledge-working outputs from information you didn't even know that the subject that found it existed or was relevant.
  - Significant, previously unseen, business value from new knowledge, created when implicit relationships and patterns among all kinds of 'subjects are made explicit.
  - New knowledge, created when implicit relationships and patterns among all kinds of 'subjects are made explicit, can be used to significant, previously unseen business value
  - Better automated support for root cause analysis