ABRIDGED PREQUALIFICATION ASSESSMENT

WHO Prequalification of In Vitro Diagnostics
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1. Introduction

World Health Organization (WHO) prequalification of in vitro diagnostics (IVDs) is coordinated through the department of Essential Medicines and Health Products. Focus is placed on IVDs for priority diseases and their suitability for use in resource-limited settings.

WHO prequalification of IVDs is a comprehensive quality assessment of individual IVDs through a standardized procedure aimed at determining whether the product meets WHO prequalification requirements.

The abridged prequalification assessment includes the following components:
- performance evaluation including operational characteristics;
- manufacturing site inspection of abridged scope; and
- labelling review.

This document should be read in conjunction with the “Overview of the WHO prequalification of in vitro diagnostics assessment” document PQDx_007.

2. Intended Audience

This document has been prepared to provide manufacturers with information on the abridged prequalification assessment. Manufacturers wishing to apply for WHO prequalification of their product(s) should read this document before submitting the pre-submission form for prequalification.

3. Definitions

Abridged WHO prequalification assessment: Prequalification assessment including performance evaluation, manufacturing site inspection of abridged scope and labelling review

4. Abbreviations

BLA: Biologics License Application
CMDCAS: Canadian Medical Devices Conformity Assessment System
EC: European Commission
FDA: Food and Drug Administration of the United States of America
GHTF: Global Harmonization Task Force
IVD: In vitro diagnostic medical device
JMHLW: Japanese Ministry of Health, Labour and Welfare
NRA: National Regulatory Authority
PMA: Premarket Approval
TGA: Australian Therapeutic Goods Administration
WHO: World Health Organization

5. Rationale for abridged assessment

The rationale for abridged prequalification assessment is that a prior regulatory approval provides a level of assurance relating to the product’s quality, safety and performance in countries where it is approved, but it cannot always provide the same assurance when the product is used in other jurisdictions, including resource-limited settings.
The aim of abridged prequalification assessment is to avoid duplication of effort and reduce the time taken to prequalify a product by focusing on aspects where WHO prequalification assessment brings added value. WHO will review the pre-submission form and supporting documentation to determine whether the product qualifies for an abridged prequalification assessment. Products that do not qualify for abridged prequalification assessment will undergo a full prequalification assessment.

WHO will apply the abridged prequalification assessment process, in accordance with this document, in the following instances:

1. if a stringently assessed regulatory version is submitted for prequalification;
2. if a non-stringently assessed (rest of world) regulatory version of the product is submitted for prequalification assessment but a stringently assessed regulatory version also exists, and there are no substantial differences between the two regulatory versions.

WHO reserves the right to shift from an abridged assessment to a full assessment at any stage in the prequalification assessment process, if the manufacturer fails to submit satisfactory evidence supporting a previous stringent review.

6. Abridged assessment process

6.1. Eligibility for abridged assessment

When considering whether a product qualifies for an abridged assessment procedure, WHO takes into account two factors: whether the product has been stringently assessed and, if so, whether the regulatory version of the product submitted for prequalification is the same regulatory version that was stringently assessed. The assessment for the following risk classes is considered to be stringent, see Table 1.

<table>
<thead>
<tr>
<th>Regulatory authority</th>
<th>Risk classes undergoing stringent assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>European Union</td>
<td>Annex II, List A</td>
</tr>
<tr>
<td>US Food and Drug Administration</td>
<td>Class III</td>
</tr>
<tr>
<td>Health Canada</td>
<td>Class IV</td>
</tr>
<tr>
<td>Therapeutic Goods Administration, Australia</td>
<td>Class 4</td>
</tr>
<tr>
<td>Ministry of Health, Labour and Welfare, Japan</td>
<td>Class III</td>
</tr>
</tbody>
</table>

Based on these factors, a product is eligible for abridged assessment if one of the following conditions is met:

- The regulatory version submitted for WHO prequalification has undergone prior stringent regulatory review by a GHTF founding member; or
- The regulatory version submitted for WHO prequalification is different from the version that underwent regulatory review by a GHTF founding member, but there are no substantial differences between the two regulatory versions.

1 The “same regulatory version” relates to the information associated with a submission for approval by a regulatory authority. The submitted version is defined by all of the documentation related to development, manufacture and intended use, labelling and post-market surveillance of the product and all the documented evidence supporting the safety and performance claims associated with that submission. If any aspect of this documentation differs in any way between the submissions to different regulatory authorities or assessment bodies (United States Food and Drug Administration, Health Canada, a Notified Body for CE marking, etc.) it is considered to be a different regulatory version.
substantial differences between the two regulatory versions that will have impact on the safety, quality or performance of the IVD.

Conversely, a product is not eligible for abridged assessment if:
- The regulatory version submitted for WHO prequalification is different from the version that underwent regulatory review by a founding member of GHTF, and there are substantial differences between the two regulatory versions; or
- No stringently assessed regulatory version of the product exists. This includes products previously assessed by a GHTF founding member, but not according to an appropriate level of stringency (lower risk classification), and products previously assessed by a regulatory authority that was not a GHTF founding member.

Products not eligible for abridged prequalification assessment will require a full prequalification assessment (review of a product dossier, performance evaluation including operational characteristics, inspection of manufacturing site(s) and labelling review).

Figure 1 summarizes the eligibility requirements and decision process for abridged assessment.

![Figure 1- Decision tree for abridged assessment](image-url)
Differences between a full and an abridged prequalification assessment

The full prequalification assessment process includes the following components:

- review of a product dossier;
- performance evaluation including operational characteristics;
- inspection of a manufacturing site; and
- labelling review.

An abridged assessment takes into account available evidence that an eligible product meets a number of WHO prequalification requirements as a result of its stringent regulatory approvals. Table 2 lists the differences between a full and an abridged prequalification assessment. Additional details are provided in Section 6.3 below.

**Table 2 - Differences between a full and an abridged prequalification assessment**

<table>
<thead>
<tr>
<th>PQ stage</th>
<th>Full assessment</th>
<th>Abridged assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Review of a product dossier</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Inspection of a manufacturing site</td>
<td>Inspection of manufacturing site(s) under the full prequalification assessment</td>
<td>Manufacturing site inspection of abridged scope*</td>
</tr>
<tr>
<td>Performance evaluation including operational characteristics</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Labelling review</td>
<td>Yes</td>
<td>yes</td>
</tr>
</tbody>
</table>

*For contents of the information package see Section 6.3.3

### 6.2. Abridged assessment process

#### 6.2.1. Pre-submission stage

The prequalification pre-submission form submitted by the manufacturer will be used to:

- provide information on the product submitted for prequalification;
- identify the regulatory version submitted for prequalification; and
- determine the differences between existing regulatory versions of the product.

WHO will determine (i) if there is acceptable evidence of prior stringent assessment and approval for the product submitted for prequalification, and (ii) if the product is eligible for abridged assessment. For such evidence to be considered acceptable, the product must meet the requirements for placing on the market in the respective regulatory jurisdiction. Table 3 shows acceptable evidence for abridged prequalification assessment.

**Table 3 - Acceptable evidence of stringent regulatory assessment**

<table>
<thead>
<tr>
<th>Regulatory authority</th>
<th>Acceptable evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>European Union</td>
<td>EC Full Quality Assurance Certificate</td>
</tr>
<tr>
<td></td>
<td>EC Production Quality Assurance Certificate</td>
</tr>
<tr>
<td></td>
<td>EC Type-Examination Certificate</td>
</tr>
</tbody>
</table>
6.2.2. Decision to abridge prequalification assessment

WHO will determine if the product qualifies for abridged assessment according to Section 6.1 above. If the regulatory version submitted for WHO prequalification is different from the version that underwent regulatory review by a founding member of GHTF, WHO will compare the key differences between the stringent regulatory version and the regulatory version submitted for prequalification. These include the product description, intended use, test procedure, labeling, instructions for use, quality management system, design, manufacturing site, key suppliers, verification/validation studies, and lot release criteria.

As described in Section 6.1 above, if there are substantial differences, the full prequalification assessment will be performed. If there are no substantial differences, the abridged prequalification assessment will be performed.

NOTE: In some cases, a product may have multiple regulatory versions and associated approvals and more than one of the different types of evidence specified in Table 3. Each of these approvals may support different aspects of the WHO requirements, further facilitating the abridged prequalification assessment. Therefore, it is important for the manufacturer to submit to WHO all available evidence of previous stringent regulatory approvals.

6.2.3. Readiness for manufacturing site inspection of an abridged scope

If the product qualifies for abridged prequalification assessment, the manufacturer must submit an information package in order to assist WHO in preparing for the manufacturing site(s) inspection. The contents of the information package are as shown in Table 4.

Table 4- Information package contents

<table>
<thead>
<tr>
<th>Element</th>
<th>Required documents</th>
</tr>
</thead>
<tbody>
<tr>
<td>Quality Management System</td>
<td>Quality manual</td>
</tr>
<tr>
<td></td>
<td>Staff organigram</td>
</tr>
<tr>
<td></td>
<td>Change control procedure</td>
</tr>
<tr>
<td></td>
<td>Complaint handling and vigilance procedure</td>
</tr>
<tr>
<td></td>
<td>Audit report of most recent regulatory inspection/audit</td>
</tr>
<tr>
<td></td>
<td>Current certificates</td>
</tr>
</tbody>
</table>

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6.2.4. Manufacturing site(s) inspection

Under the abridged prequalification assessment, a manufacturing site inspection of abridged scope will take place. The on-site inspection time will be calculated and limited to those product- and user-specific processes that are a major focus of WHO prequalification inspections (e.g. risk management, in-use stability under poorly controlled conditions, impact on stability of transportation, information gathered from the market etc., user training and training material).

The inspection scope will not include an in-depth review of all QMS procedures and processes usually inspected, but instead will take into consideration the findings of the most recent regulatory audit report. There will be limited sampling of some of the general quality management processes and associated records and a follow-up on, or clarification of, individual findings identified during the previous inspection.

The manufacturing site inspection of abridged scope will be shorter in duration and with fewer inspectors (usually one inspector and one technical expert) compared to a full prequalification assessment manufacturing site inspection.

A preliminary non-conformance report detailing issues of concern (if any) will be provided to the manufacturer on the final day of the inspection. A final inspection report, including the graded nonconformities will be issued to the manufacturer after the inspection of the manufacturing site(s).

All nonconformities must be corrected by the manufacturer through suitable corrective actions addressing the root cause of each nonconformity. The manufacturer will have the opportunity to submit up to two corrective action plans. Depending on the nature and number of nonconformities objective evidence of the effective implementation of proposed corrective actions may be required. WHO will assess the information provided and decide whether the corrective action plan can be accepted. Conformity with prequalification requirements will be established based on assessment of such information. In some instances, the number and criticality of nonconformities may require that the effective implementation of proposed corrective actions needs to be verified in a follow up inspection, before the nonconformities can be closed off.

A summary of the findings of the inspection of the manufacturing site(s) will be included in the WHO prequalification public report, if the product successfully meets the WHO prequalification requirements. In certain cases, WHO may agree, in its sole discretion, to permit the manufacturer to correct specific nonconformities after prequalification, provided that the manufacturer commits in writing to address them by an agreed upon deadline. Such a “commitment to prequalification” will be reflected in the WHO prequalification public report and will be verified during the re-inspection. Failure to comply with prequalification commitments within agreed deadlines will result in the delisting from the WHO list of prequalified IVDs. If the manufacturer does not meet WHO prequalification requirements or if any of the other conditions outlined in section 10.3 (Cancellation of the application) are met, the prequalification application will be cancelled.
6.2.5. Performance evaluation

The purpose of the performance evaluation is designed to independently verify and evaluate the performance and operational characteristics of the product. It is carried out by specified WHO Collaborating Centre(s) or designated laboratory(ies) (collectively referred to as “evaluating site(s)”), using the WHO prequalification evaluation protocol. The product will be evaluated against pre-determined performance criteria established by WHO.

The manufacturer must choose one of the following two performance evaluation options, and must indicate its choice in the pre-submission form:

Option 1: Performance evaluation commissioned by WHO and carried out at an evaluating site listed by WHO. The manufacturer must indicate in the pre-submission form its choice to undergo a performance evaluation coordinated by WHO and performed by an evaluating site selected by WHO.

Option 2: Performance evaluation commissioned by the manufacturer and carried out at an evaluating site listed by WHO. The manufacturer must indicate in the pre-submission form its choice to have the performance evaluation performed by an independent laboratory selected by the manufacturer from the list of prequalification evaluating sites.\(^2\)

If this option is chosen, the manufacturer will be responsible for paying the full cost of the performance evaluation (in addition to paying the applicable prequalification assessment fee) and for coordinating the performance evaluation directly with the evaluating site.

Regardless of the option chosen, the performance evaluation must be carried out in accordance with a publicly available WHO protocol developed in collaboration with international experts.

WHO will have absolute, exclusive, unfettered control over the manner in which the prequalification assessment process is carried out (including the performance evaluation and/or the publication of results of the prequalification assessment, regardless of the outcome).

A summary of the performance evaluation report/findings will be included in the WHO prequalification public report, if the product successfully meets the WHO prequalification requirements.

Irrespective of whether the product meets WHO prequalification requirements, a summary of the performance evaluation report will be published in a WHO composite report as part of the WHO technical series on the performance and operational characteristics of commercially available IVDs. If the product fails to meet WHO prequalification acceptance criteria for performance evaluations, the application will be cancelled.

6.2.6. Labelling review

The version of the instructions for use (IFU) of the product which is submitted with the pre-submission form will be considered during the abridged assessment. The manufacturer must obtain WHO’s written agreement prior to implementing any changes to this version of the instructions for use should be agreed to by WHO in writing prior to implementation; otherwise, the application may be cancelled.

The product labelling will be reviewed as part of the pre-submission form, performance evaluation and inspection of manufacturing site(s). The IFU is reviewed for clarity, correctness, consistency with the information submitted in the technical documentation and with international guidance.

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\(^2\) The List of WHO prequalification evaluating laboratories is available at:
http://www.who.int/diagnostics_laboratory/evaluations/170308_list_of_pq_laboratories.pdf?ua=1
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and requirements, and suitability for the target user group in WHO Member States. The overall feedback on the labelling review will be provided to the manufacturer after all abridged assessment components have been completed. If requested by WHO, the manufacturer must amend the labelling before the product can be prequalified. The agreed product labelling will be included in the prequalification public report.

6.2.7. Prequalification decision

WHO will determine whether the product meets the WHO prequalification requirements and can be included in the WHO list of prequalified IVDs. The decision to include the product in the WHO list of prequalified IVDs is made based upon information available to WHO at the time of the prequalification assessment, including information obtained as a result of the outcomes of the manufacturing site(s) inspection, the performance evaluation findings and the labelling review. This decision is subject to change on the basis of new information that may become available to WHO.

7. Relevant documents

WHO Prequalification of IVDs Programme

- Overview of the prequalification of in vitro diagnostics assessment: Document PQDx_007
- Instructions for Completion of the Pre-submission Form: Document PQDx_017
- Pre-Submission Form: Document PQDx_015

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3 Documents can be accessed through the WHO website: http://www.who.int/diagnostics_laboratory/evaluations/en/PQDx_173 v2 21 July 2017 (This document version supersedes any previous document versions)