The need for adverse event reporting and post market surveillance

Dr. Giuseppe Ruocco
Ministry of Health - ITALY
The regulatory framework for EU Member States
Legislation – EU and Italy
Active Implantable Medical devices (AIMD)

EU Directive 90/385/EEC
and its integrations, amendments and corections
(last one: dir 2007/47/EC)

Transposition

Legislative Decree December 14th, 1992 n. 507
(pubbl.: Italian Repubblic Official Journal, Dec. 30th, 1992 n. 305)
and its modifications
Legislation – EU and Italy Medical devices (MD)

EU Directive 93/42/EEC
and its integrations, amendments and corections
(last one: dir 2007/47/EC)

Transposition

Legislative Decree February 24th, 1997 n. 46*
(pubbl.: Supplement of the Italian Repubblic
Official Journal, Mar. 6th, 1997 n. 54) and its modifications
Legislation – EU and Italy
IN VITRO DIAGNOSTICS (IVD)

EU Directive 98/79/CEE
and its integrations, amendments and corections
(last one: dir 2007/47/EC)

Transposition

Legislative Decree September 8th, 2000 n. 332
(pubbl: Supplement n. 189/L of Italian Repubblic Official Journal, Sep. 17th, 2000 n. 269) and its modifications
The “New Approach” Main features - 1

- **Under the responsibility of the manufacturer**
  - No preliminary authorisation before marketing
  - Assessment of the conformity to Essential Requirements and other legislative provision made by the manufacturer in cooperation with Notified Body (higher risk classes)
  - CE Mark –
  - Registration
  - Free circulation in the internal market
  - …
The “New Approach” Main features - 2

- **Under the responsibility of Competent Authorities:**
  - *Post market surveillance* in cooperation among them and as part of initiatives at international level (i.e., GHTF)

  “Member States shall take all necessary steps to ensure that devices may be placed on the market and/or put into service only if they *comply with the requirements laid down*” in the directives “when duly supplied and properly installed, maintained and used in accordance with their intended purpose”

  - Safeguard clause. Interim measures
  - Particular health monitoring measures (prohibition, restriction, particular requirements)
Adverse event reporting - 1

“Member States shall take the necessary steps to ensure that any information brought to their knowledge regarding the following incidents:

- Any **malfunction or deterioration in the characteristics and/or performance** of a device, as well as any **inadequacy in the labeling or the instructions for use** which might lead or might have lead to the **death of a patient**, or user or of other persons or to a **serious deterioration in their state of health**

- Any **technical or medical reason** in relation to the characteristics or performance of a device (see above) leading to systematic **recall** of devices of the same type

is recorded and evaluated
Guidelines on a Medical Device Vigilance System

EUROPEAN COMMISSION
DG ENTERPRISE AND INDUSTRY
Directorate F-Consumer Good
Unit F3- Cosmetic and Medical Devices

MEDICAL DEVICES: Guidance document

MEDDEV 2.12-1 rev 6
December 2009
10.3 ANNEX 3 REPORT FORM FOR MANUFACTURER’S TO THE NATIONAL COMPETENT AUTHORITY

Report Form
Manufacturer’s Incident Report
Medical Devices Vigilance System
(MEDDEV 2.12/1 rev 5)

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<tr>
<th>1 Administrative information</th>
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<tbody>
<tr>
<td>Recipient</td>
</tr>
<tr>
<td>Name of National Competent Authority (NCA)</td>
</tr>
<tr>
<td>Address of National Competent Authority</td>
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<table>
<thead>
<tr>
<th>Date of this report</th>
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<table>
<thead>
<tr>
<th>Reference number assigned by the manufacturer</th>
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<table>
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<tr>
<th>Reference number assigned by NCA to whom sent (if known)</th>
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<tr>
<th>Type of report</th>
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<tr>
<td>Initial report</td>
</tr>
<tr>
<td>Follow-up report</td>
</tr>
<tr>
<td>Combined Initial and final report</td>
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<tr>
<td>Final report</td>
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</table>

<table>
<thead>
<tr>
<th>Classification of incident</th>
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<tbody>
<tr>
<td>death or unanticipated serious deterioration in state of health, serious public health threat</td>
</tr>
<tr>
<td>All other reportable incidents</td>
</tr>
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</table>

<table>
<thead>
<tr>
<th>Identify to what other NCAs this report was also sent</th>
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<table>
<thead>
<tr>
<th>2 Information on submitter of the report</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Status of submitter</th>
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<tbody>
<tr>
<td>Manufacturer</td>
</tr>
<tr>
<td>Authorised Representative within EEA and Switzerland</td>
</tr>
<tr>
<td>Others: (identify the role)</td>
</tr>
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</table>

<table>
<thead>
<tr>
<th>3 Manufacturer information</th>
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</thead>
</table>
Transposition of Directives in Italy: Adverse Event Reporting

Manufacturer

Health care professionals
Users

Ministry of Health

FSCA
FSN

Other Competent Authority

European Commission
The Italian Organisation
Organization

- No Agencies involved
- Ministry of Health itself is the “Competent Authority” and the “Notified Bodies’ Designating authority”
Organization

D. G. Drugs and Medical Devices (DGFDM)

Office III AIMD-MD
Regulation
NB Authorisation
Post Market Surv.

Office IV IVD
Regulation
NB Authorisation
Post Market Surv.
IVD Incident managt.

Office V MD-AIMD
Incidents management

Office VI MD-AIMD
Clinical investigations

Consultant bodies

National Health Institute (ISS)

National Commission for MD (CUD)

National Health Council (plenary Assembly, Sect. V/other sect.)

Offices I, II, VII, VIII
Cosmetics, Biocides, Medicinal Products, Pharmacies

Dr. G. Ruocco
Ministry of Health
Directorate General of Drugs and Medical Devices

16
National Commission for MD (CUD)

**Composition**
- Medical Specialists (different branches)
- Hospital Pharmacists
- Economists specialized in the pharmaceutical sector
- Bio-medical Engineers
- Other Experts

**Organization**
Plenary meeting, working group, Secretariat
National Commission for Medical Devices (CUD) – Terms of reference

- Creation of a National Classification of MD (CND)
- Identification of essential elements for the realization of:
  - a National Inventory of MD available in Italy (in connection with the European database EUDAMED)
  - a National Monitoring System on MD purchased by NHS
- Giving advices on problems related to MDs to the D.G.
National Health Institute (I.S.S.)*
Tasks in the MD field

• Technical Advices
• Tests on devices (vigilance on incidents, market surveillance)

* ISS is also Notified body (CE 373)
National Health Council
Tasks in the MD field

• National Health Council gives advices on issues of relevance for the Minister and to the Ministry of Health. The DG asks for the advice.
• The Minister is informed about the question and the opinion expressed by the Council.
• Consequent actions may be adopted (the advice is not mandatory)
Organization/Personnel

• INTERNAL STAFF AND PERIPHERAL UNITS
  – Medical Doctors
  – Pharmacists
  – Biologists
  – Health Inspectors
  – Administrative Personnel

• CONSULTANTS
  – Bio-medical Engineers
  – Other technical experts *(as needed)*
  – Health Police Corp (Carabinieri NAS)

• TRAINING COURSES
Market surveillance

- On the initiative of the Department (campaigns for MD categories)
- Based on incident reports
- Based on other reports (related to one or more MDs) from:
  - other CA (MSOG, etc.)
  - N.B., judicial Courts, Carabinieri per la Sanità /NAS (police forces)
  - public (companies, privates)
Market surveillance – worktools

- web portal (www.salute.gov.it) - MD Thematic Area
- Mailboxes
- National Classification of MD (CND)
- MD databases ("Repertorio" and "Osservatorio")
- Expert teams for audits and/or assessment of device files
### Dati di registrazione della persona delegata

<table>
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<tr>
<th>Codice Fiscale</th>
<th>sanita31313133333</th>
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<tr>
<td>Cognome</td>
<td>Santacroce</td>
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<tr>
<td>Nome</td>
<td>Lara</td>
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### Dati Generali dell'Azienda

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<tr>
<th>Denominazione:</th>
<th>NUOVO_FABRICANTE INC.</th>
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<tr>
<td>Codice Fiscale:</td>
<td>PE25920596677</td>
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<tr>
<td>Partita IVA / VAT Number:</td>
<td>MAN033666677</td>
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**Sede Legale**

* Nazione: ITALIA
* Comune: NEW DELI
* Provincia: 
* Località: 
* C.A.P.: 00000
* Indirizzo: SINT AVENUE
* Telefono: 38789878787
* e-mail: Simon@U.K

**Legale rappresentante**

* Cognome: VIVI
* Nome: VIVI

**Riferimento per comunicazioni**

<table>
<thead>
<tr>
<th>Cognome</th>
<th>VIVI</th>
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<tbody>
<tr>
<td>Nome</td>
<td>VIVI</td>
</tr>
<tr>
<td>Ufficio</td>
<td>VIVI</td>
</tr>
</tbody>
</table>
* Telefono: 0888888888
* Fax: 0888888888
* e-mail: vivi@vivi.it

**Registrazione ai sensi dell'art. 13 Dlgs 46/97**

Evento num. di registrazione art. 13 Dlgs 46/97:

### Dati del responsabile della vigilanza sul DM

<table>
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<td>Telefono:</td>
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<td>Fax:</td>
<td></td>
</tr>
<tr>
<td>e-mail:</td>
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Market surveillance: audits

Audit Programme (Units III-IV-V) → Audit (Auditors) → Complete report to Units III or IV (Auditors) → Real time Preliminary N.C. Notification (Auditors)

Assessment Notification of NCs and Observations (Unit III or IV) → N.B. (s) → Other C. A.(s)

Inspected Manuf, AR, Resp, distr, … → Other Manuf, AR, Resp, distr, … → Max 30 dd. Corrective actions

(If necessary) Actions (Unit III-IV)

Target of audits: manufacturers, authorized representatives, distributors, sellers, hospitals

Dr. G Ruocco
Ministry of Health
Directorate General of Drugs and Medical Devices
Audits 2002/09 - 1

Figura 1 - Tipologia aziende ispezionate
Audits 2002/09 - 2

COMPLAINTS

CE mark 47%
ER and Risk management 57%
Labelling and IFU 44%
Technical dossier 49%
Post market follow up 48%
Traceability 44%
Stockpiling 18%
Training 30%
Risk classification 8%
Quality system 2%
Agreements between manuf. and distr. 4%
Conference and training 11%
Registration 7%
Other 3%

Market surveillance: audits

Problems - 1

Related to the devices:
- Dossier inadequacy (structure and contents of technical files: E.R., risk analysis, Conformity declaration contents)
- Misclassification
- Mistakes, inadequacy or absence of labels and/or IFU
- Not regular MD itself
Market surveillance: audits (2002-05)

Problems - 2

- Related to procedural issues:
  - Procedural inadequacy
    (product tracking, post-marketing surveillance, adverse events recording, personnel training)
  - Insufficient instructions to the distribution network with regard to MD traceability, transport, stockage, maintenance
Market surveillance: audits (2002-05)

Problems - 3

- Related to the facilities:
  - Stockage of expired devices
  - Not well controlled stockage conditions (temperature, stockpiling, etc.)
  - Inadequacy of sterilization stations
  - Inadequacy of controlled contamination rooms
Port & Airport Health Units: activity in the field of MD
(2008-09 Checked Lots)

Attività USMAF totale di partite DM controllate
anni 2008 e 2009

1st class Unit
2nd class Unit

Dr. G Ruocco
Ministry of Health
Directorate General of Drugs and Medical Devices
Country of origin of MD entering EU through Italy borders 2008-09

2008: 4145
2009: 5782 (+16%)
totale: 9927

- CINA: 32%
- STATI UNITI: 22%
- SVIZZERA: 7%
- MALESIA: 5%
- TUNISIA: 3%
- SVIZZERA: 3%
- TURCHIA: 2%
- TAIWAN: 2%
- GIAPPONE: 2%
- TAILANDIA: 2%
- TAIWAN: 2%
- INDIA: 2%
- ALTRI: 1%
- PAKISTAN: 1%
- SERBIA: 1%
- AUSTRALIA: 1%
- HONG KONG: 1%
- CANADA: 1%

Dr. G Ruocco
Ministry of Health
Directorate General of Drugs and Medical Devices
Incident Reporting
Incident reporting

- Sub-units devoted to specific types of MD (cardiological, implantable prosthesis, IOL, etc.)
- The report can be presented by paper, by certificated mail, by fax
- Electronic dBase including a workflow
- Work in progress: a new web-based system for electronic reporting, linked with the General National dBase and with the European dBase Eudamed
- Specific section in the Web portal
Transposition of Directives in Italy: Adverse Event Reporting: Tools

- Manufacturer
- Health care professionals
- Ministry of Health: Registration in Incident dBase - Assessment
  - ELECTRONIC SUBMISSION (2011)
  - FSCA FSN
- Other Competent Authority
- European Commission
- General dBase (Repertorio)
- MOH Web Portal

Dr. G. Ruocco
Ministry of Health
Directorate General of Drugs and Medical Devices
MARKET SURVEILLANCE AND INCIDENT REPORTING

a shared responsibility!
THANK YOU FOR YOUR ATTENTION!

Dr. Giuseppe Ruocco
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00144 ROMA EUR (Italia)
Phone +3906.5994.3207 – 3241 - 3886
Mobile +39335.7712771/ +39335.496441
Fax +3906.5994.3776
Mail: g.ruocco@sanita.it
INCIDENT REPORTING - ITALY

YEAR

NUMBER OF REPORTS

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<th>YEAR</th>
<th>2007</th>
<th>2008</th>
<th>2009</th>
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<tbody>
<tr>
<td>Incidents</td>
<td>661</td>
<td>666</td>
<td>1423</td>
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<tr>
<td>Missed Incidents</td>
<td>148</td>
<td>24</td>
<td>65</td>
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<tr>
<td>Recalls</td>
<td>429</td>
<td>143</td>
<td>350</td>
</tr>
<tr>
<td>Other commun.</td>
<td>988</td>
<td>917</td>
<td>361</td>
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ADVERSE EVENT REPORTING: DEVICE’S CATEGORY

- Administration & collection of blood samples
- Cardiovascular
- Machines
- Surgical instruments
- Protection
- Odonto-Oculistic-Otorino
- Sutures
- Ematology & Transfusion
- Anesthesia & Respiratory
- Surgery and electrosurgery
- Dialysis
- Support to disabilities
- Medications
- Liquids for contact lenses
- Other

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Ministry of Health
Directorate General of Drugs and Medical Devices
Avvisi di sicurezza

Dal 1° Ottobre 2008 la pubblicazione web degli AVVISI DI SICUREZZA da parte della Direzione Generale Farmaci e Dispositivi Medici, sarà la principale modalità di divulgazione degli avvisi, avendo superato con successo la fase sperimentale.

Informazioni generali sugli avvisi

Licenza di pubblicità sanitaria: attivazione di una procedura sperimentale

28 luglio 2010 - Dal 1 ottobre 2010 sarà attivata, in via sperimentale, la procedura relativa all’invio delle istanze di autorizzazione alla pubblicità sanitaria tramite posta elettronica certificata.

Report di Horizon Scanning

13 luglio 2010 - On line il nuovo Report relativo alle guide coronariche per la fractional flow reserve.
### Ultimi 20 avvisi pubblicati

<table>
<thead>
<tr>
<th>Data pubblicazione</th>
<th>Numero riferimento</th>
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<td>Roche Diagnostics AG</td>
<td>Amplilink Software vs 3.1 e 3.2 Software</td>
<td>IVD</td>
<td>• <strong>Avviso</strong> (pdf, 435 Kb)</td>
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<td>2010-1192</td>
<td>Abbott Laboratories</td>
<td>Cell-Dyn Emerald Analyzer Sistema di chimica clinica</td>
<td>IVD</td>
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<td>CELL DYN Sapphire Vent Head Assembly (Cod. 8H53-02), CELL DYN Sapphire</td>
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### Published FSN

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<tr>
<td>2008</td>
<td>109</td>
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<tr>
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