WHO Prequalification of In Vitro Diagnostics

WHO post-market surveillance for HIV related IVDs

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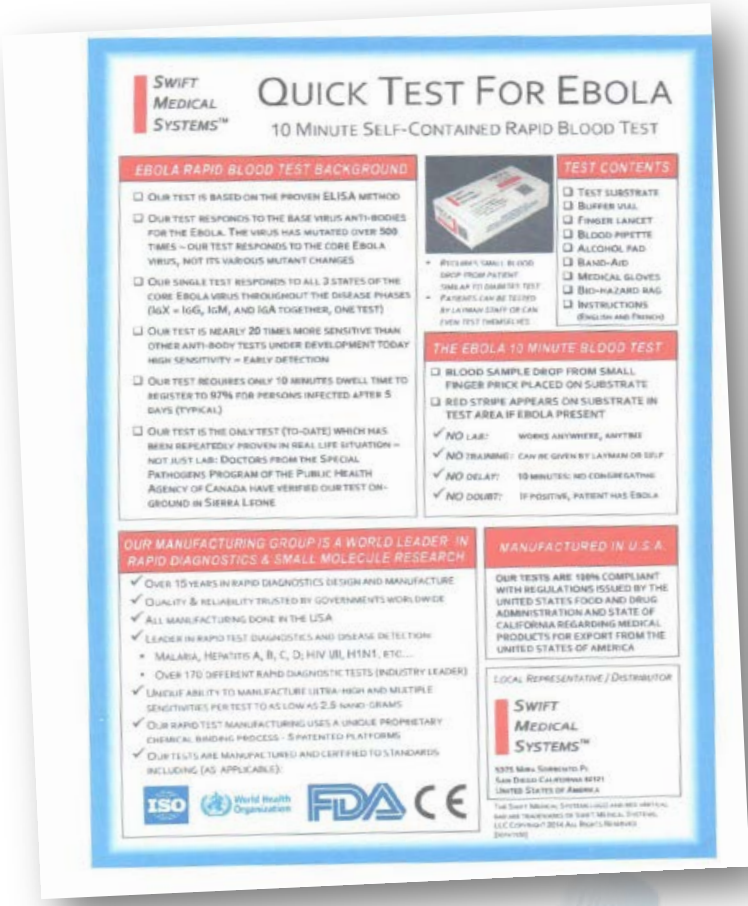
About post-market surveillance of IVDs

- **Some quality, safety and performance issues may only arise after an IVD is placed on the market**

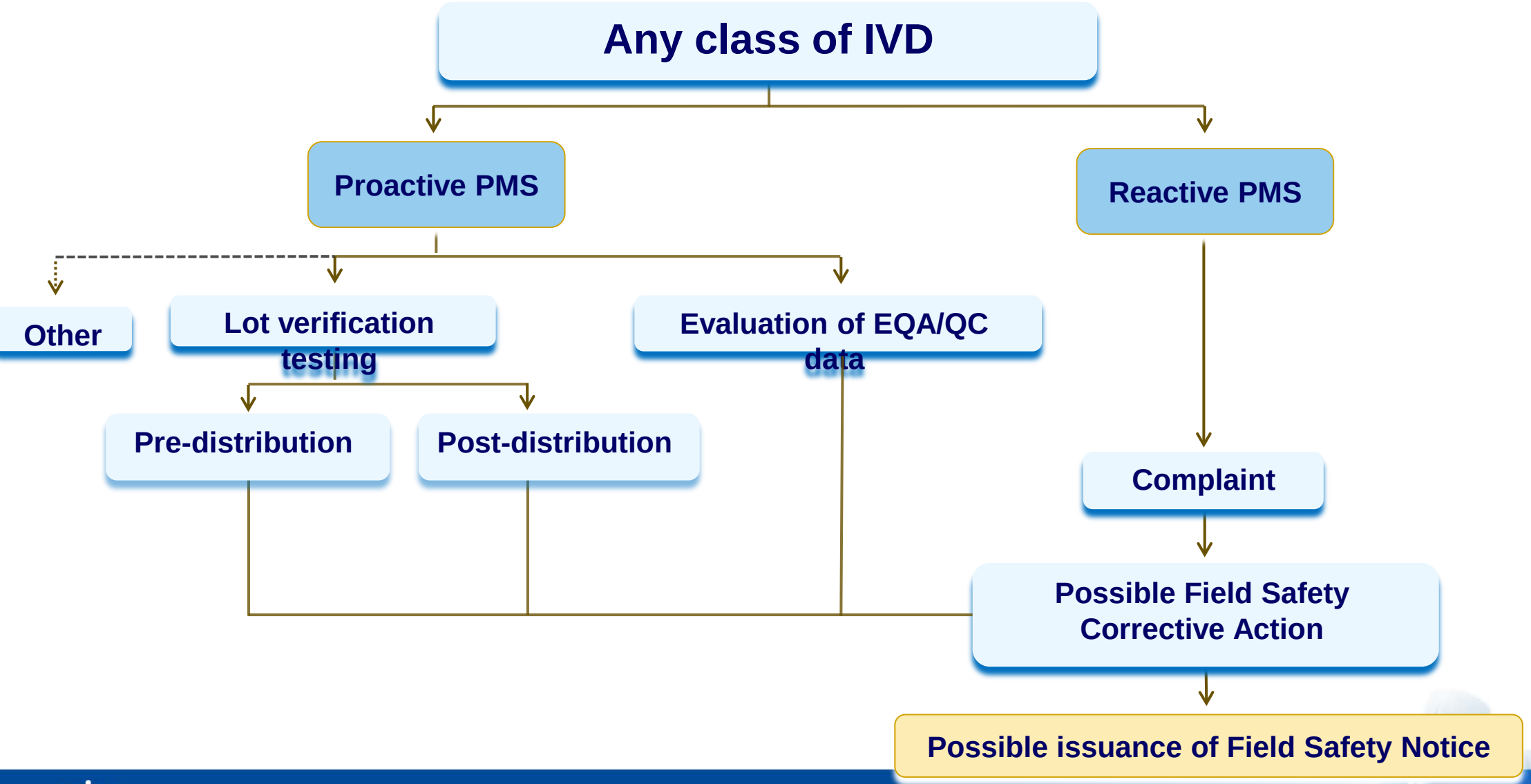
- **Requirements for post-market activities by manufacturers are listed in:**
  - ISO 9001, ISO 13485, ISO 14971

About post-market surveillance of IVDs

- **Adequate post-market surveillance is necessary to detect, investigate and act on any issues that could or have compromised individual health or public health related to use of an IVD**



About post-market surveillance of IVDs



Proactive post-market surveillance of IVDs

Lot verification testing

Independent of the manufacturer

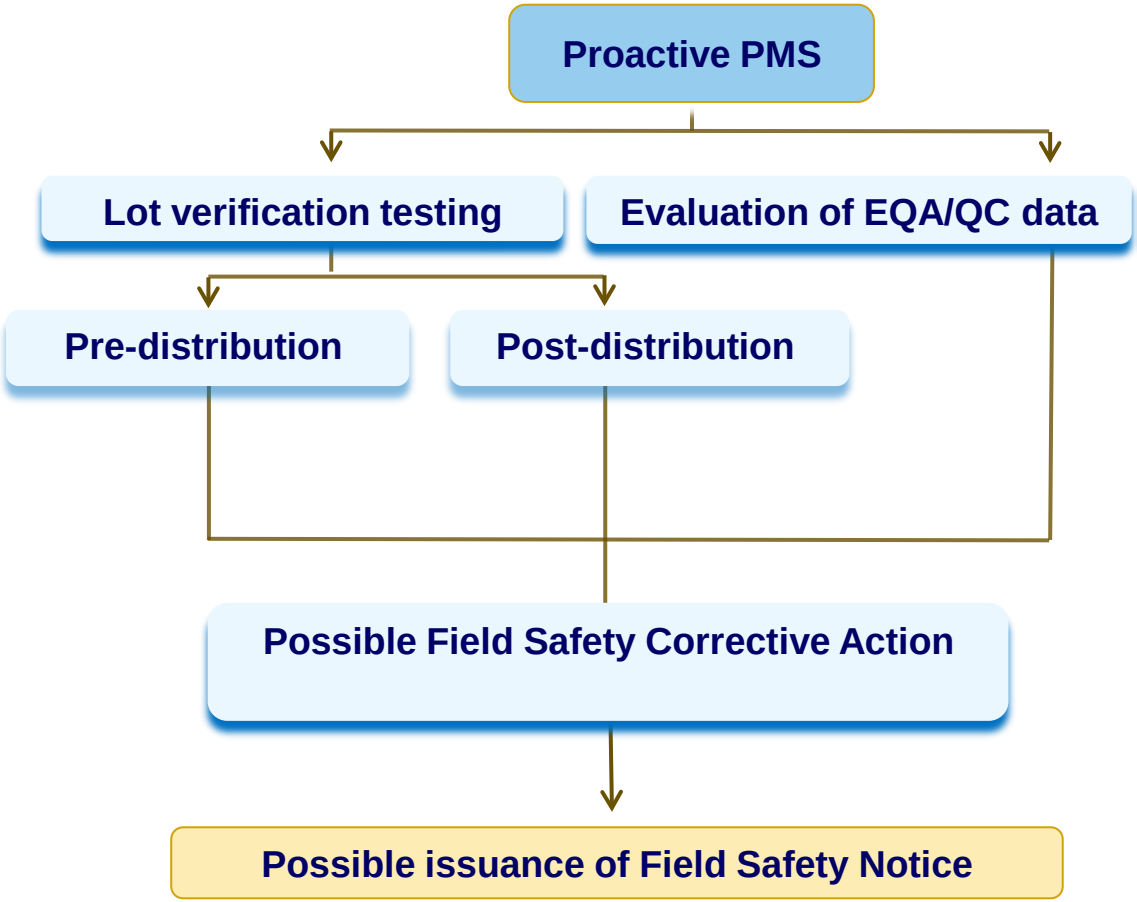
- Not lot release testing

Ensures that only lots meeting established criteria are delivered to users

- Using a risk-based approach

Evaluation of EQAS and QC testing results

Across sites using the same assay, same/different lot



Lot verification testing
Sampling for lot testing

Pre-distribution sampling

Systematically test all lots or test a random sample

Easier to prevent delivery of poorly performing lots to the testing sites

Post-distribution sampling

Random lots from each level of health system

More difficult to recall defective lots

Individuals may already have been tested using those lots

May use a risk-managed approach to decide on sampling interval, depends on size of lot and evidence of previous acceptable testing results

Lot verification testing

- **Lot verification by suitably qualified laboratory using SOPs so that each lot testing event is consistent**
- **Through physical inspection of packaging, labelling and instructions for use**
  - **Looking for breaches of packaging that might affect stability**
- **Testing of samples from each lot of the same IVD**
  - **Against a well-characterized panel of specimens, same panel for both pre-distribution and post-distribution lot testing**
- **Lot acceptance criteria must be in place (pass/fail) for both inspection and testing**

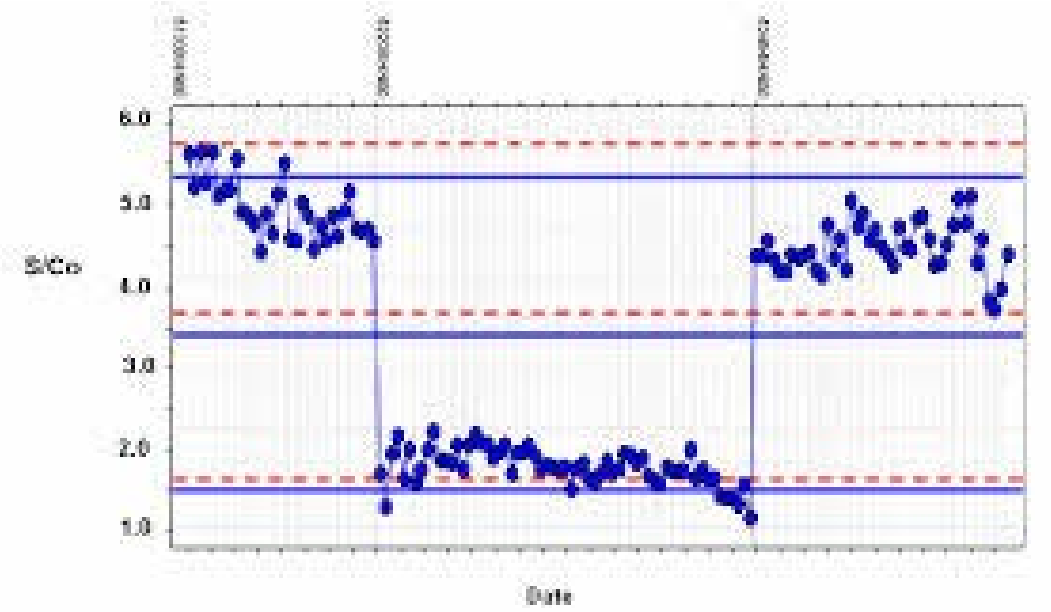
Lot verification testing
results of lot testing

Lot testing panel characterized by an agreed reference standard

- Reactive and nonreactive clinical specimens
- Diluted specimens to test analytical sensitivity (LoD) (ensure appropriate matrix for dilution)
- Record invalid rates and other anomalies as these are significant too
  - Incomplete clearing, high background, faint lines

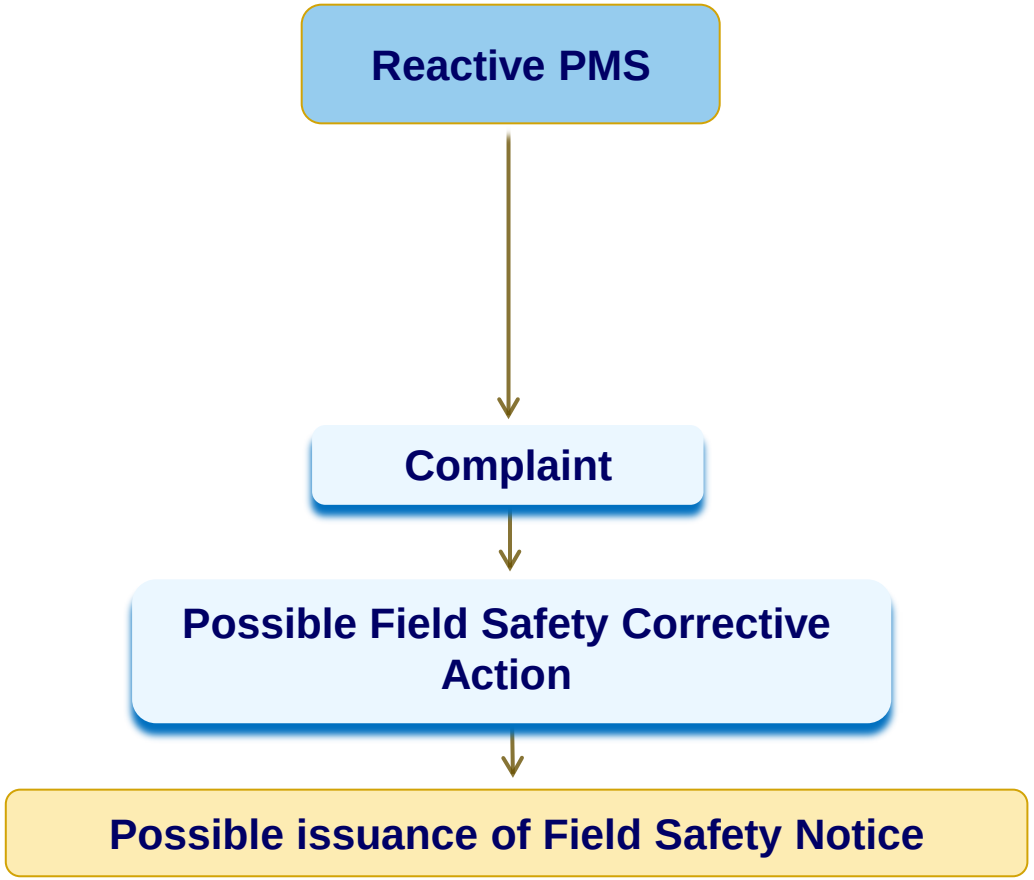
Evaluation of EQA/QC data

- Review data from external quality assessment schemes (proficiency testing) and end-user QC
- Greatest value when there are many users are of the same assay
- Useful to report differences in performance such as this example of a shift (lot to lot)

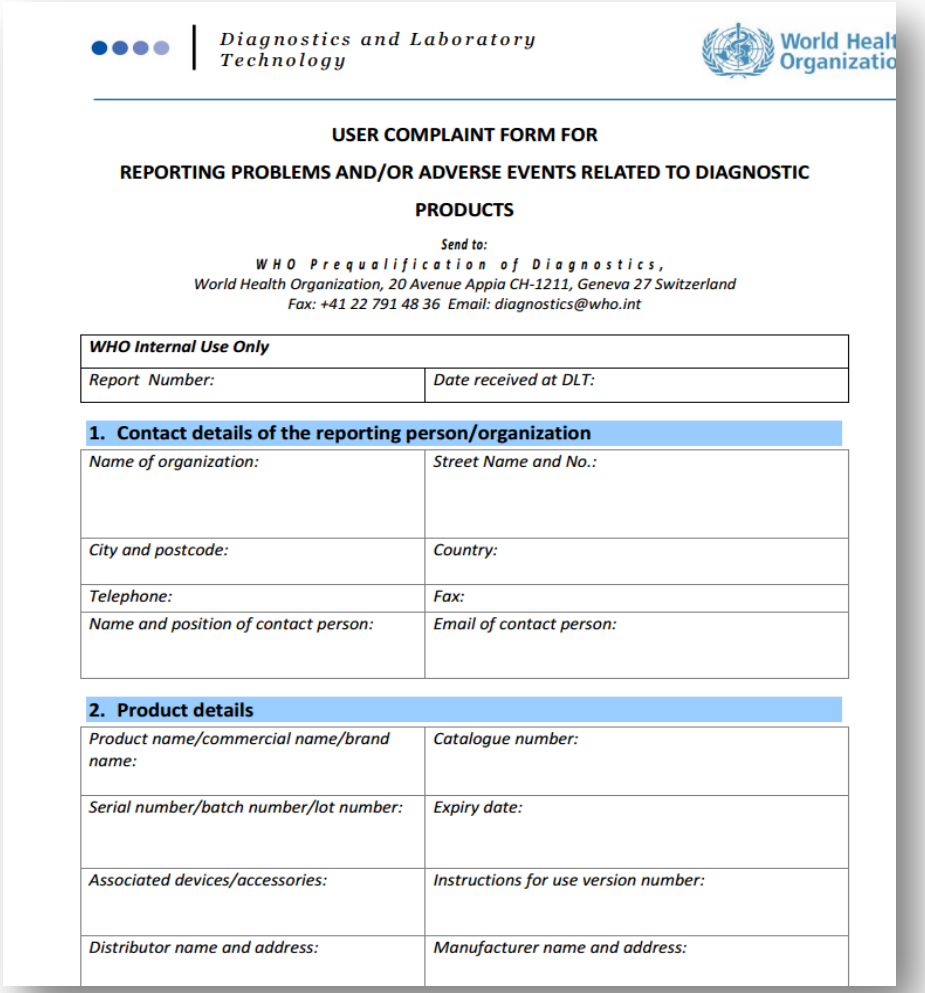


Reactive post-market surveillance of IVDs

- **Reporting of administrative and technical complaints by end-users/procurers/ implementers**
- As soon as you become aware
- **Ensures that any necessary FSCA is undertaken, and notified to users via a FSN**
- e.g. lot recall, modification of test procedure (IFU), etc.



Complaint reporting for users



Diagnostics and Laboratory Technology

World Health Organization

USER COMPLAINT FORM FOR

REPORTING PROBLEMS AND/OR ADVERSE EVENTS RELATED TO DIAGNOSTIC PRODUCTS

Send to:

WHO Prequalification of Diagnostics,
World Health Organization, 20 Avenue Appia CH-1211, Geneva 27 Switzerland
Fax: +41 22 791 48 36 Email: diagnostics@who.int

WHO Internal Use Only	
Report Number:	*Date received at DLT:*

1. Contact details of the reporting person/organization

Name of organization:	*Street Name and No.:*
City and postcode:	*Country:*
Telephone:	*Fax:*
Name and position of contact person:	*Email of contact person:*

2. Product details

Product name/commercial name/brand name:	*Catalogue number:*
Serial number/batch number/lot number:	*Expiry date:*
Associated devices/accessories:	*Instructions for use version number:*
Distributor name and address:	*Manufacturer name and address:*

Complaint reporting for users

Serious	Moderate	Mild
Death of patient, user or other person	Any false HIV positive result	Deficiency found by the user prior to use
Serious injury of patient, user or other person	Anomalies that lead to a higher than expected rate of invalid, unreturnable or inconclusive results	Event caused by patient conditions
Death or serious injury of patient, user or other person **did not occur but might have** occurred		Service life or shelf life of medical devices exceeded
Any false HIV negative result		Malfunction protection against a fault operated correctly
		Negligible likelihood of occurrence of death or serious injury
		Expected and foreseeable side effects
		Adverse events described in FSN

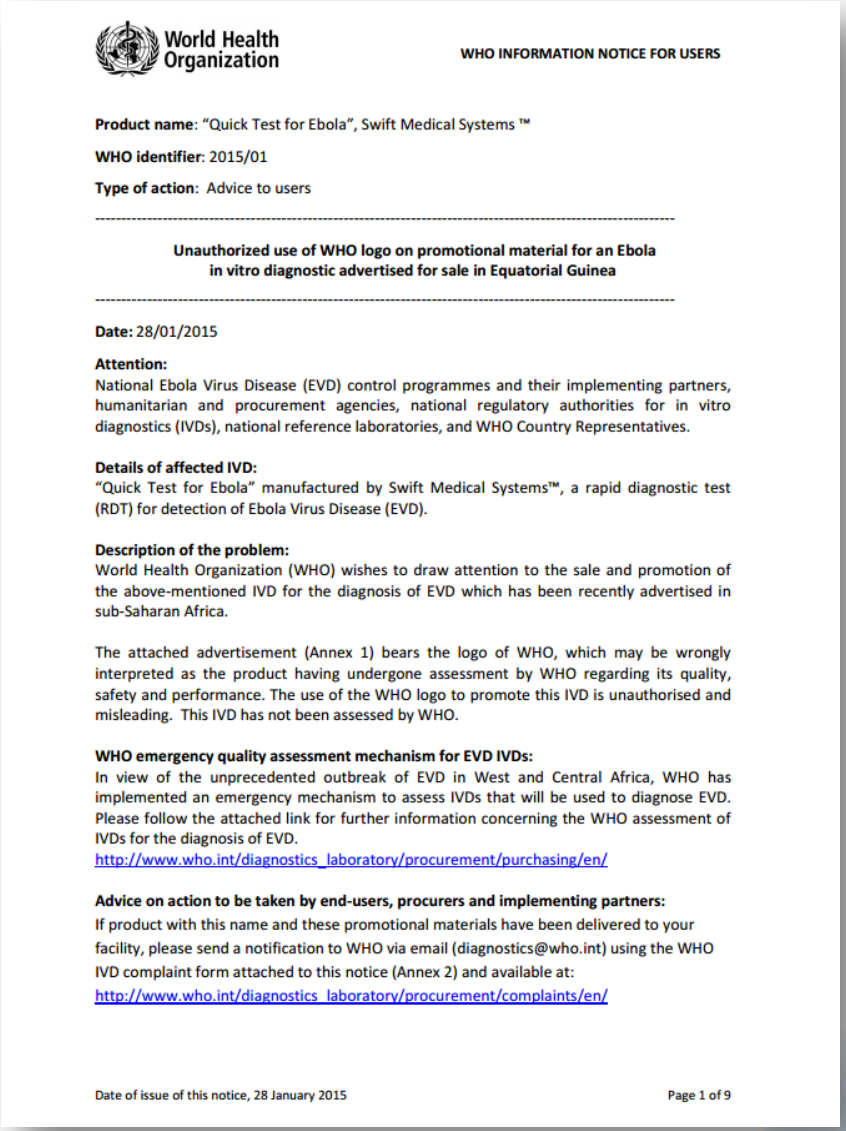
Field Safety Corrective Action

- **A FSCA is triggered when there is an unacceptable increase in risk associated with use of the IVD**
- **A FSCA is an action taken by the manufacturer to reduce a risk of death or serious deterioration in the state of health associated with the use of an IVD that is already placed on the market**
- **FSCAs may include:**
  - **return of IVD to supplier (recall) , IVD modification (including IFU), IVD exchange (swap-out), IVD destruction, retrofit by modification\design control (usually related to instruments)…**

Field Safety Notice

If a FSCA is undertaken

- e.g. change to reading time to improve specificity, shortening of expiry date for a particular lot, etc.
- **End-users will be informed using a Field Safety Notice sent by the manufacturer, via their in-country distributor**
- **End-users should follow instructions of FSN and contact WHO when in doubt**



World Health Organization

WHO INFORMATION NOTICE FOR USERS

Product name: "Quick Test for Ebola", Swift Medical Systems ™

WHO identifier: 2015/01

Type of action: Advice to users

Unauthorized use of WHO logo on promotional material for an Ebola in vitro diagnostic advertised for sale in Equatorial Guinea

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Date: 28/01/2015

Attention:
National Ebola Virus Disease (EVD) control programmes and their implementing partners, humanitarian and procurement agencies, national regulatory authorities for in vitro diagnostics (IVDs), national reference laboratories, and WHO Country Representatives.

Details of affected IVD:
"Quick Test for Ebola" manufactured by Swift Medical Systems™, a rapid diagnostic test (RDT) for detection of Ebola Virus Disease (EVD).

Description of the problem:
World Health Organization (WHO) wishes to draw attention to the sale and promotion of the above-mentioned IVD for the diagnosis of EVD which has been recently advertised in sub-Saharan Africa.

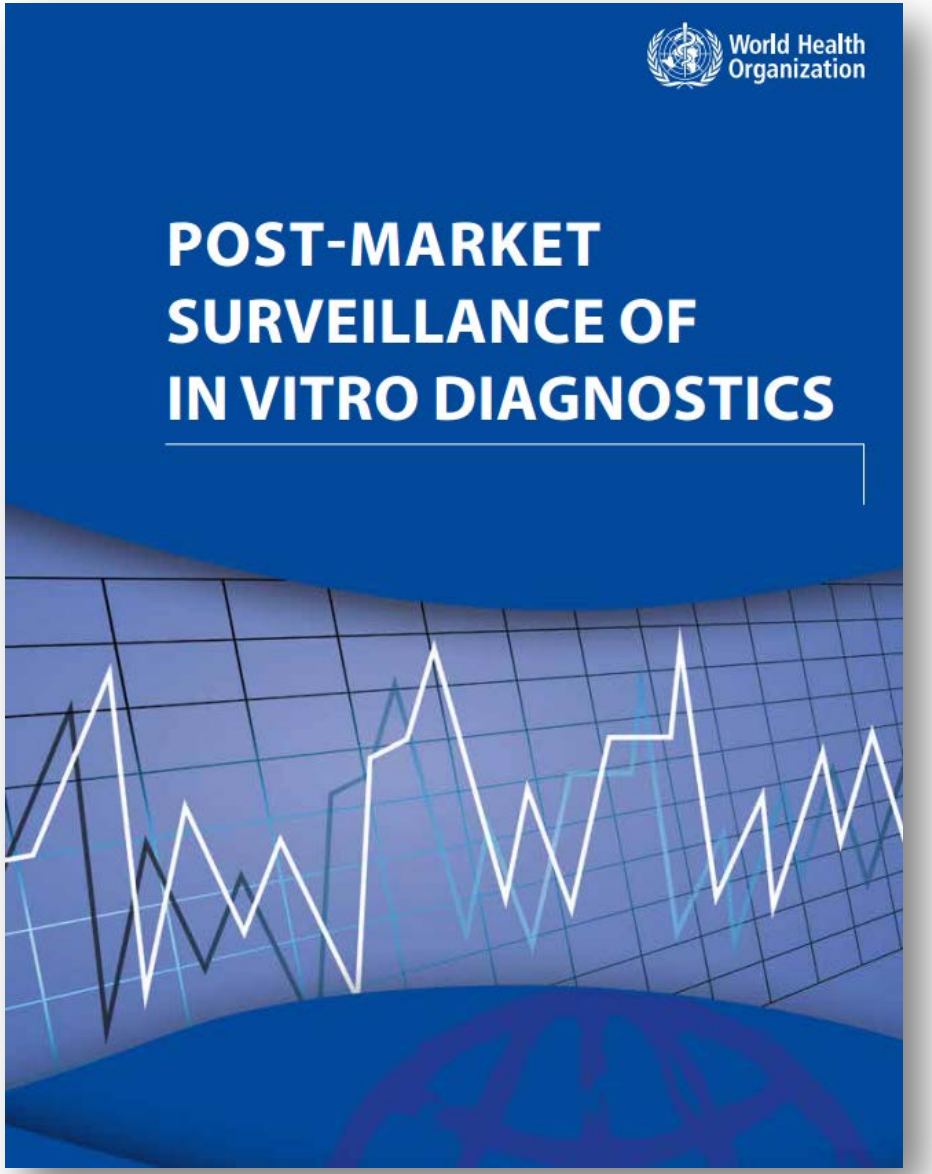
The attached advertisement (Annex 1) bears the logo of WHO, which may be wrongly interpreted as the product having undergone assessment by WHO regarding its quality, safety and performance. The use of the WHO logo to promote this IVD is unauthorised and misleading. This IVD has not been assessed by WHO.

WHO emergency quality assessment mechanism for EVD IVDs:
In view of the unprecedented outbreak of EVD in West and Central Africa, WHO has implemented an emergency mechanism to assess IVDs that will be used to diagnose EVD. Please follow the attached link for further information concerning the WHO assessment of IVDs for the diagnosis of EVD.
http://www.who.int/diagnostics_laboratory/procurement/purchasing/en/

Advice on action to be taken by end-users, procurers and implementing partners:
If product with this name and these promotional materials have been delivered to your facility, please send a notification to WHO via email (diagnostics@who.int) using the WHO IVD complaint form attached to this notice (Annex 2) and available at:
http://www.who.int/diagnostics_laboratory/procurement/complaints/en/

Date of issue of this notice, 28 January 2015 Page 1 of 9

WHO normative guidance on PMS



- **Roles/responsibilities of stakeholders**
- **Forms**
  - **IVD complaint report**
  - **Manufacturer complaint investigation report**
  - **Field Safety Corrective Action report**
  - **Lot testing data collection & report**
- **Notices**
  - **Field Safety Notice**

Where to find information

Contact us by email

diagnostics@who.int

Sign up for our mailing list

By emailing diagnostics@who.int

Check our website

Post-market surveillance

http://www.who.int/diagnostics_laboratory/postmarket/en/

Complaints and product alerts

http://www.who.int/diagnostics_laboratory/procurement/complaints/en/

Thank You