Post-marketing Safety Measures by Marketing Authorization Holders of Medical Devices

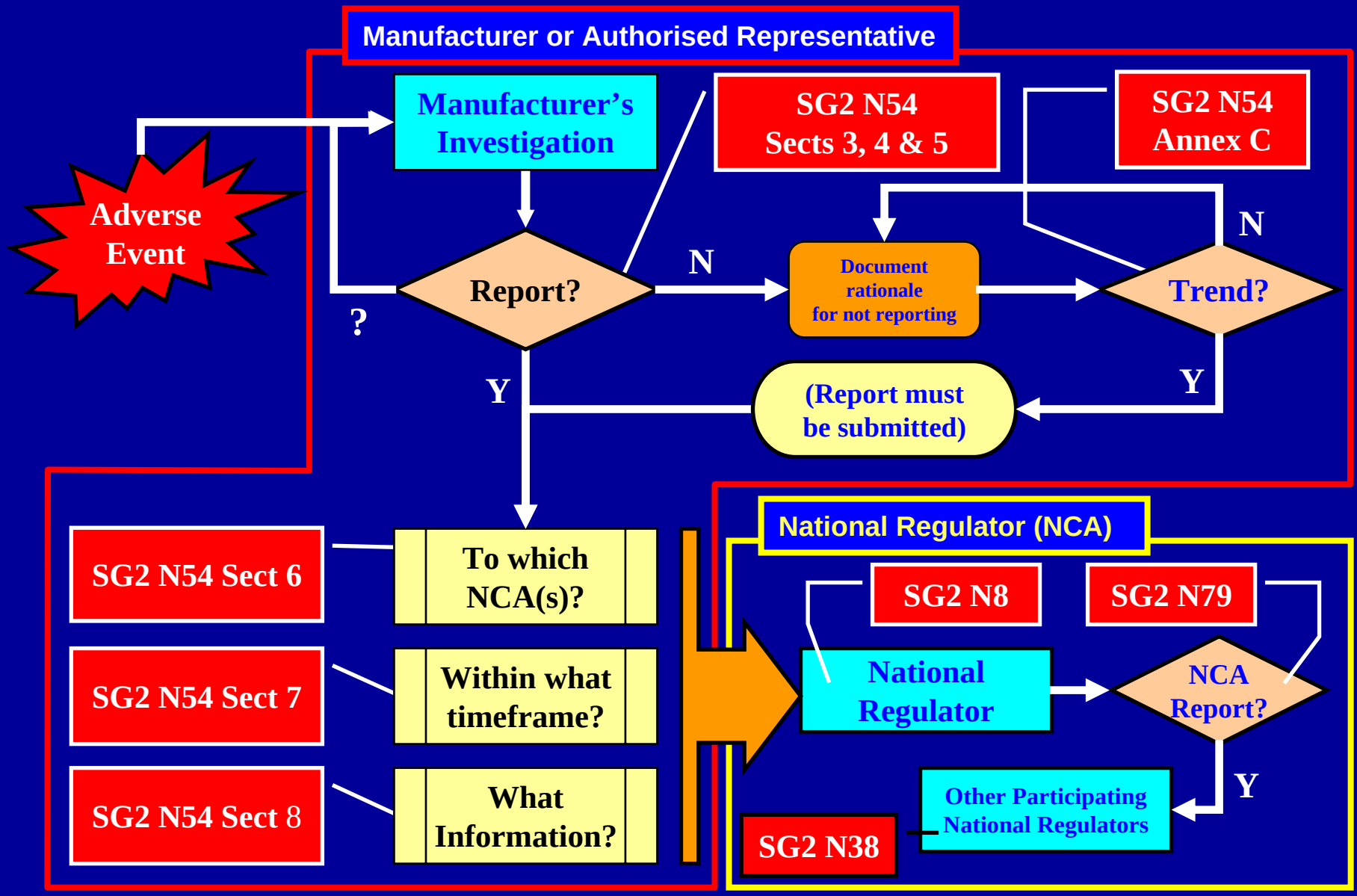
Oct 24, 2007

Hiroshi Ishikawa
Toshiba Medical Systems Corporation

CONTENTS

1. Who provide the AE Report and to Who
2. What type of event has to be reported
3. Decision trees
4. By when the AE report has to be done
5. Type of report summary

Map of SG2 Guidance on AE Reporting



1. Who provide the AE Report and to Who

Pharmaceutical Affairs Law Revisions

1. **Shift from control of pharmaceuticals to control as medical devices**

2. **International harmonization:**

   Utilization benefits of GHTF activity for medical devices, corresponding to ICH activity for pharmaceuticals

3. ***Reinforcement of post-marketing safety measures***

4. **Implementation of risk analysis before application**

Newly-created

Licensed Marketing Authorization Holders（MAH)
（製造販売業）

Marketing Authorization Holder

Businesses that introduce medical devices into the Japanese market and entire responsibility for market in Japan

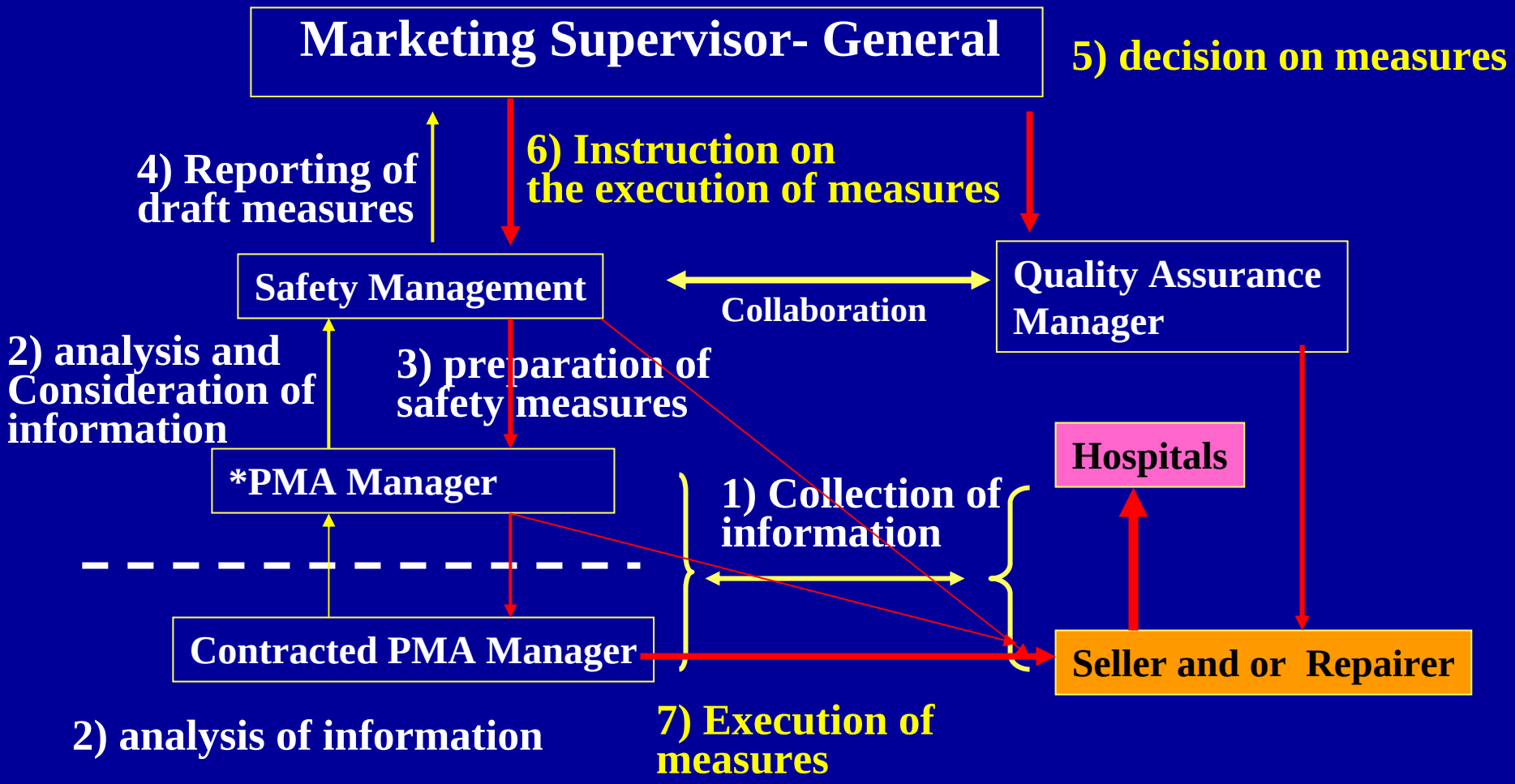
- **Cannot manufacture any medical product**
- **Cannot sell direct to end user**

Assure *quality and post-marketing safety* as an organization

- **Do not implement acceptance inspection or labeling in Japanese (those are the process of Manufacturing)**
- **Storage operations of finished products are allowed (with requirements)**

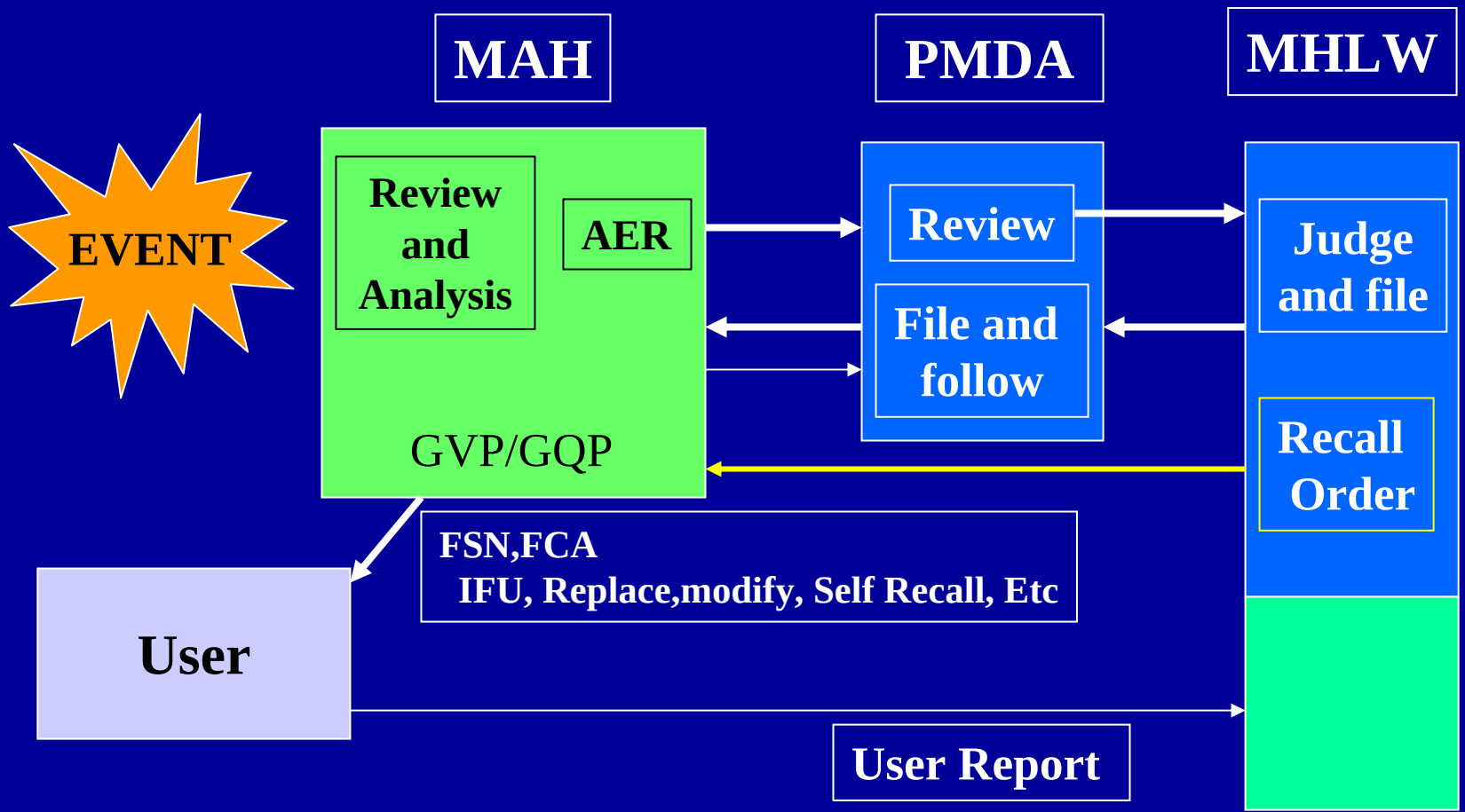
Engage in the procedures to gain approval for each of the medical devices to be marketed.

GVP Duties

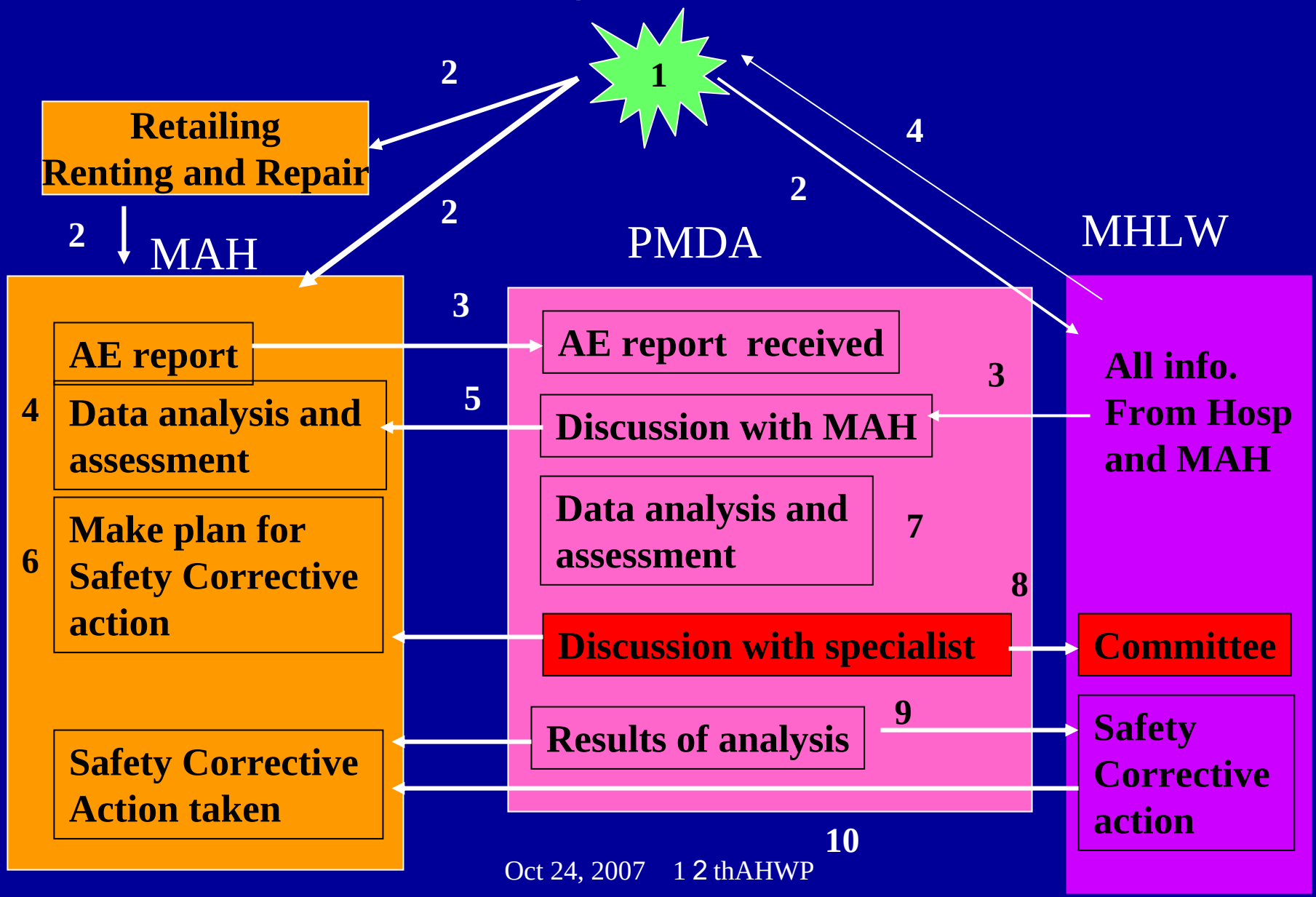


*PMA Manager: Acting manager for Safety Manager

To WHO to report



AE Reporting System in Japan



2. What type of event has to be reported

Unnecessary to report as AE

Related to the user operation
- **User Error**
- **Miss Use**
- **Abnormal Use**

Related to the Patient issue
- **diseases** oriented

No relation with the relevant medical device

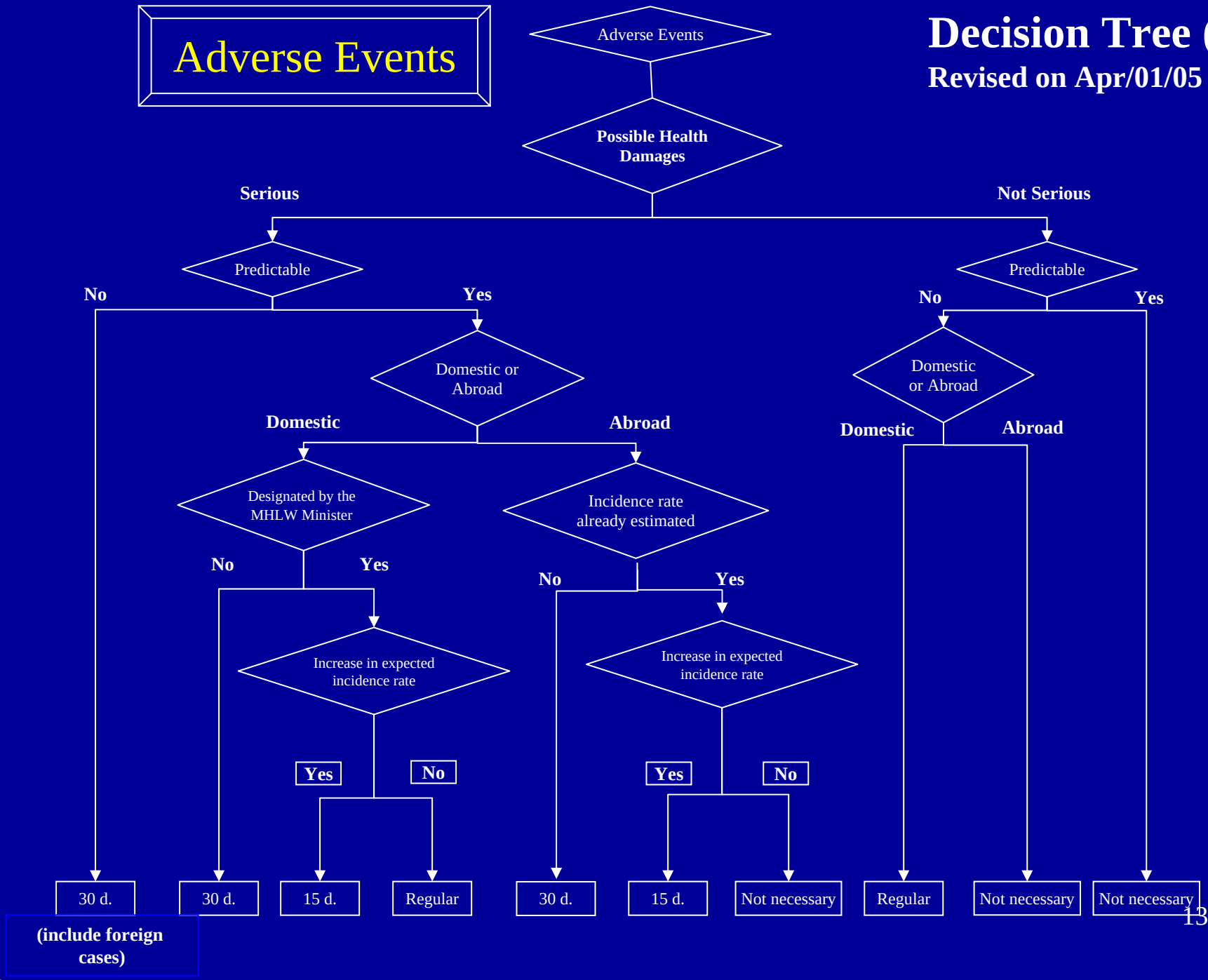
Follow the Flow chart

3. Decision trees

Adverse Events

Decision Tree (1)

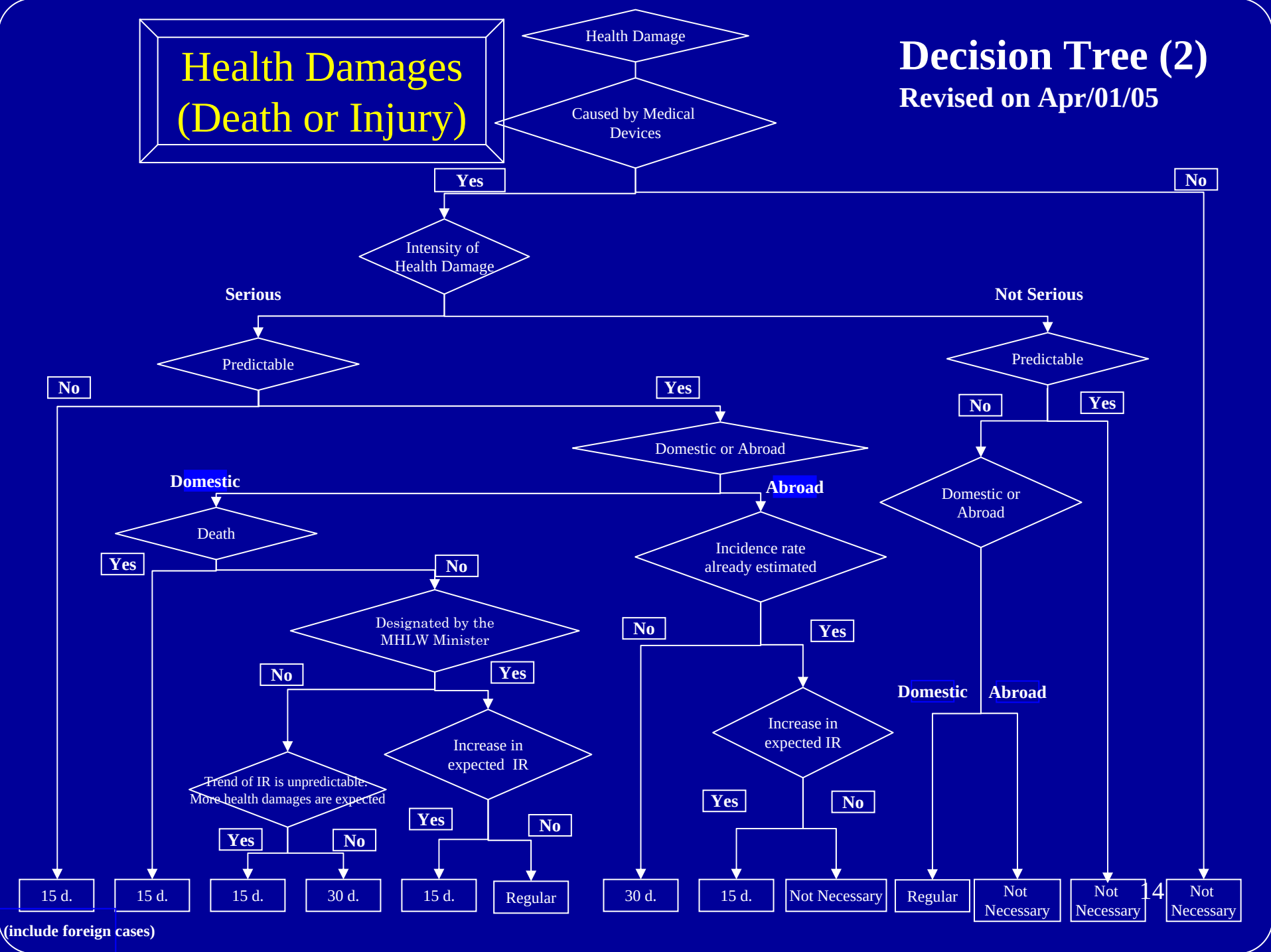
Revised on Apr/01/05



Health Damages (Death or Injury)

Decision Tree (2)

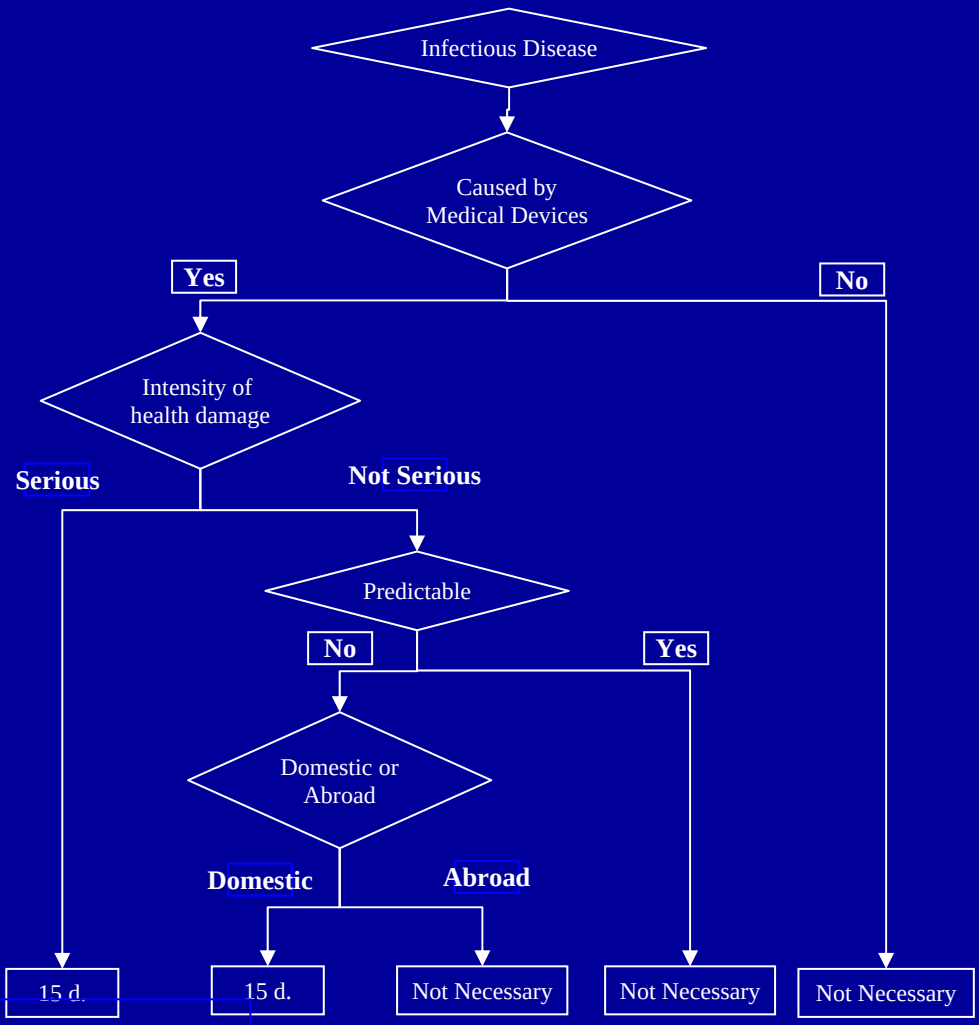
Revised on Apr/01/05



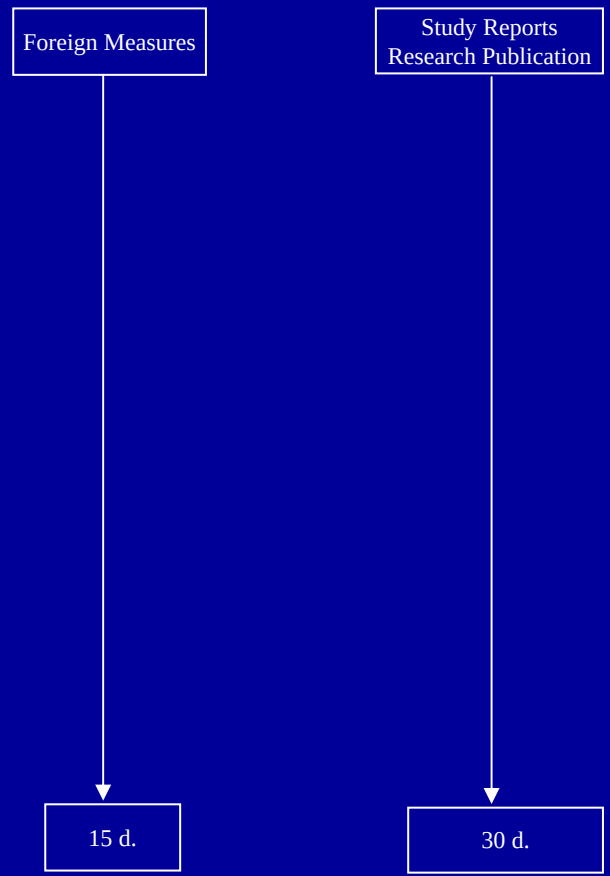
Infections

Decision Tree (3)

Revised on Apr/01/05



Foreign Measures / Research



4. By when the AE report has to be done

Medical Devices, Domestic Cases

【Previous regulations】

Intensity	Predict-ability		Report Due Date	
			Malfunction	Health damages
Serious	Expect the Trend of Incidence	N/P	15 d.	15 d.
		P	30 d.	30 d.
Moderate	Expect the Incidence	N/P	30 d.	30 d.
		P	-	-
Mild			-	-

N/P: Not Possible, P: Possible

* 1・ Exceeded the incidence rate of malfunction known in advance

* 2・ Impossible to expect the incidence trend from precautions of use, or the change of trend in occurrence suggests the possible occurrence or spread of hazards to the public health and hygiene

【Revised regulations】

Intensity			Predictability from Precaution for Use, etc.	Report Due Date	
				Malfunction	Health damage
Serious	Death		Impossible to expect	30 d.	15 d.
		known	i) Not designated by the Minister among cases in ii)	30 d.	
		known	ii) Malfunctions designated by the Ministers that the IR can be known in advance	15 d. (* 1)	
		known	ii) Malfunctions designated by the Ministers that the IR can be known in advance	Regular	
	Other than death		Impossible to expect	30 d.	15 d.
		known	i) Not designated by the Minister among cases in ii)	30 d.	15 d. (* 2)
					30 d.
		known	ii) Malfunctions designated by the Ministers that the IR can be known in advance	15 d. (* 1)	
				Regular	
non-serious			Unknown	Regular	Regular
			known	-	-

Medical Devices, Foreign Cases

【 Previous regulation 】

Intensity	Predict-ability		Report Due Date	
			Malfunction	Health damages
Serious	Expect the Trend of Incidence	N/P	15 d.	15 d.
		P	30 d.	-
Moderate	Expect the Incidence	N/P	30 d.	-
		P	-	-
Mild			-	-

* 1・ **Exceeded** the incidence rate of malfunction expected in advance

【 Revised regulation 】

Intensity		Predictability from Precaution for Use etc.		Report Due Date	
				Malfunction	Health damage
Serious	Death	Impossible to expect		30 d.	15 d.
		known	i) Other than ii)	30 d.	30 d.
			ii) Incidence rate of malfunction can be known in advance	15 d. (* 1)	
				-	
	Other than death	Impossible to expect		30 d.	15 d.
		known	i) Other than ii)	30 d.	30 d.
			ii) Incidence rate of malfunction can be known in advance	15 d. (* 1)	
				-	
		Unknown		-	-
non-serious		known		-	-

Foreign Measures/Study Report on Medical Devices

【Previous regulations】

Reports	Reports Due
Foreign Measures	15 d.
study report	30 d.

【Revised regulations】

Same reporting deadline as stated in previous regulations

Infections

All infection cases must be reported within 15 days.

【Previous regulation】

	Intensity	Predict.	Due
Domestic	15 d. Severe	N/P	
	15 d.	P	
		N/P	
	30 d. Moderate		
Foreign	- Mild	P	
	-		
		N/P	
	15 d. Severe		
		P	

【Revised regulation】

Due	Predict.	Intensity
15 d.	N/P	
Serious 15 d.	P	
15 d.	N/P	Not Serious
-	P	
15 d.	N/P	
Serious 15 d.	P	
-	N/P	Not Serious
-	P	

5. Type of report summary

Using Form Domestic Case

Intensity		Predictability from Precaution for Use, etc.		Report Due Date: Malfunction	Report Due Date: Health damage
Serious	Death	Impossible to expect		30 d.	15 d.
		known	i) Not designated by the Minister among cases in ii)	30 d.	
			ii) Malfunctions designated by the Ministers that the IR can be known in advance	15 d. (* 1)	
				Regular	
	Other than death	Impossible to expect		30 d.	15 d.
		known	i) Not designated by the Minister among cases in ii)	30 d.	15 d. (* 2)
					30 d.
			ii) Malfunctions designated by the Ministers that the IR can be known in advance	15 d. (* 1)	
				Regular	
non-serious		Unknown		Regular	Regular
		known		-	-

FORM 8

FORM 9

FORM11
Regular
Periodic Reporting

FORM12
Regular
Periodic Reporting

Using Form Foreign Case

Intensity		Predictability from Precaution for Use etc.		Report Due Date	
				Malfunction	Health damage
Serious	Death	Impossible to expect		30 d.	15 d.
		known	i) Other than ii)	30 d.	30 d.
			ii) Incidence rate of malfunction can be known in advance	15 d. (* 1)	
				-	
	Other than death	Impossible to expect		30 d.	15 d.
		known	i) Other than ii)	30 d.	30 d.
			ii) Incidence rate of malfunction can be known in advance	15 d. (* 1)	
				-	
		Unknown		-	-
non-serious		known		-	-

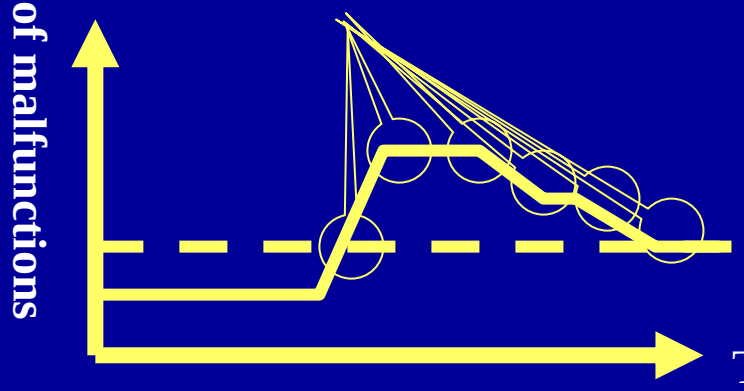
FORM 8

FORM 9

Study report on the change of IR trends

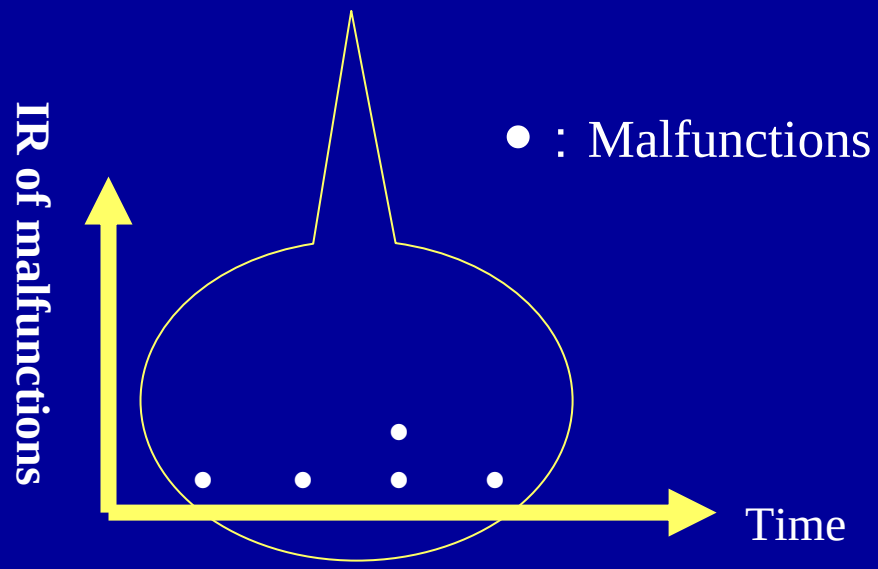
Study report on the change of IR trends

If the incidence rate of the malfunctions is already estimated and if the actual rate exceeds the known rate, the fact must be reported immediately. After this, each case may be reported anytime.
# of reports = must be reported until the rate converges on the known rate.



30-day reports

Cases must be reported within 30 days
i.e. # of reporting: 5



If the IR change cannot be estimated, report should be submitted within 30 days

Report Format

Appendix Form 12

Periodic Report on Unknown, Non-serious Failures of Medical Device

1. Control information					
1) Control No.					
2) Authorization date, certification date, notification date		3) Analysis date			
4) Report period		~			
6) Contact	Name of contact		Name of company		
			Department		
	Address				
	Tel		Fax		E-mail

2. Information on Medical Device			
1) Trade name of medical device			
2) Generic name of medical device			
3) Detailed information on medical device			
4) Marketing authorization or certification number, etc.			
5) Medical device category	<1> Highly controlled medical device	<2> Controlled medical device	<3> General medical device
	<4> Biologics medical device	<5> Designated biologics medical device	<6> None of the above
6) Note			

Periodic Report on Unknown, Non-serious Failures of Medical Device

3. Health Hazard Status

1) Number	2) Failure status	3) Health hazard status	4) Outcome	5) Number of cases	6) Action

By Health hazard status

Number of AE for the same Failure and same Health Hazard status

1. Recall
2. Stop using
3. IFU issue
4. Others

Example

Periodic Report on Unknown, Non-serious Failures of Medical Device

3. Health Hazard Status

1) Number	2) Failure status	3) Health hazard status	4) Outcome	5) Number of cases	6) Action
1	Non	eruption	Recover	4	3 Change IFU
2	Crack up	stomachache	Recover	15	1 Recall

Describe more details

Thank you for your kind attention.