Common Registration File and Good Review Practice

PAHWP Pre-Forum Workshop
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This Talk

- What is regulation?
- How to review
  - Elements of Good Review Practice
- What to review
  - Elements of a Common Registration File for PAHWP
  - PAHWP response to the IMDRF consultation document on IVD Market Authorization Table of Contents
  - How does a PAHWP Common Registration File compare to other registration files, using IMDRF members practices as an example?
- Review of safety and quality considerations for POC CD4, viral load, and EID assays

Where we want to be…

Have tests that are:

Reliable – always work

Accurate – provide a correct result

Robust – compatible with extreme working and storage conditions

REGULATION

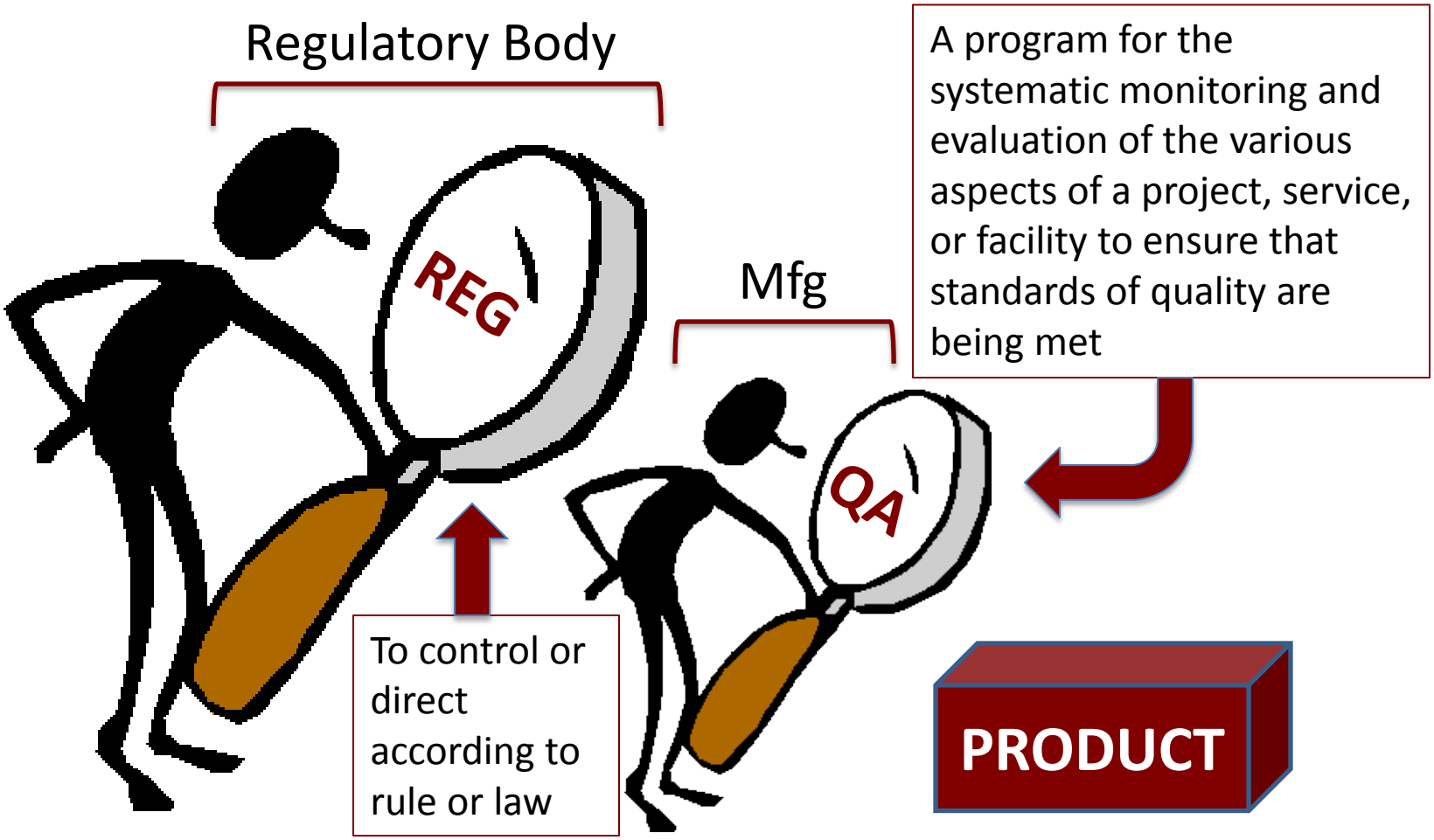
Affordable – to meet budget constraints

Available – in sufficient supply to meet demand

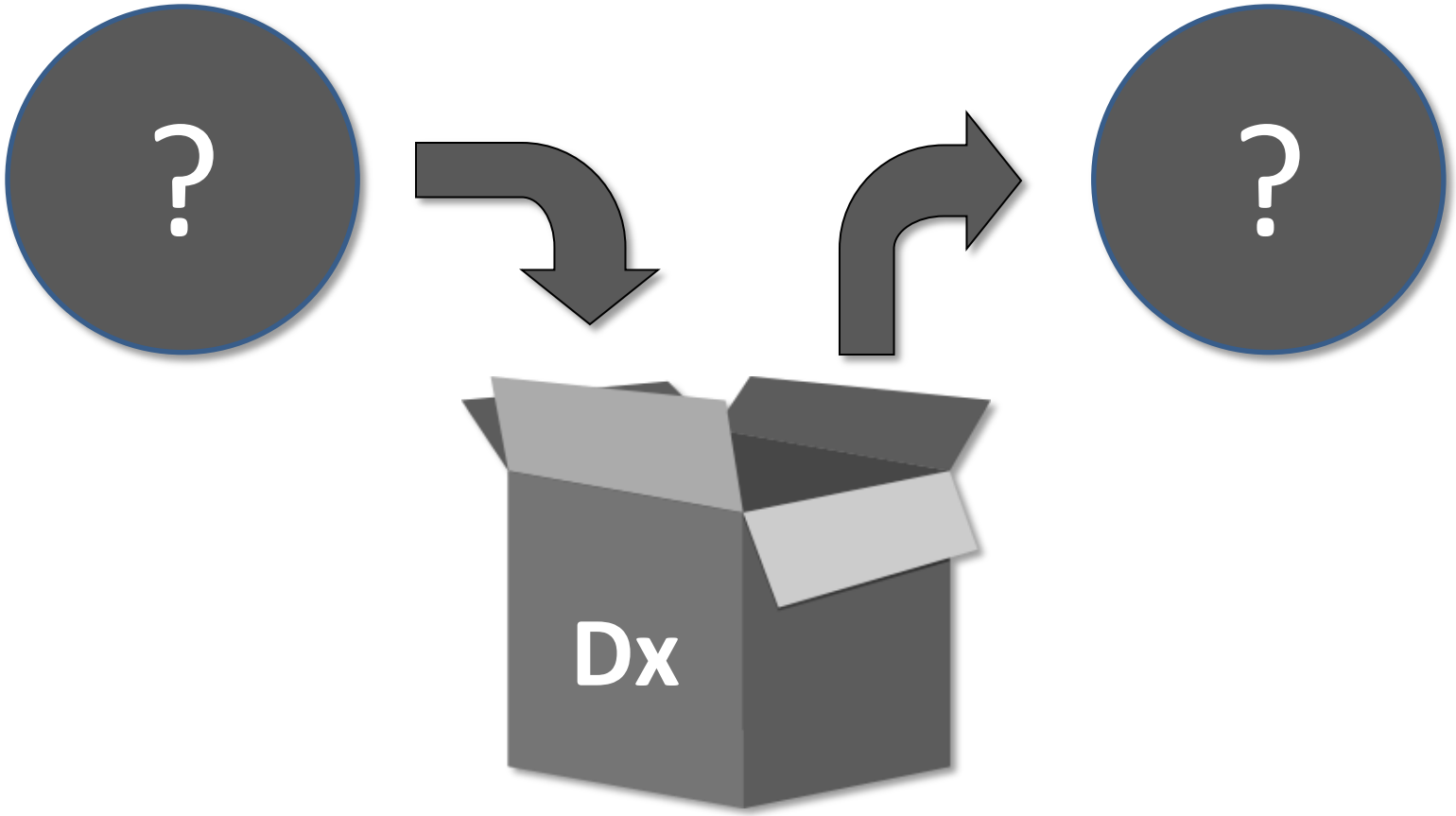
Compatible – appropriate for the population with which it will be used

ACCESS

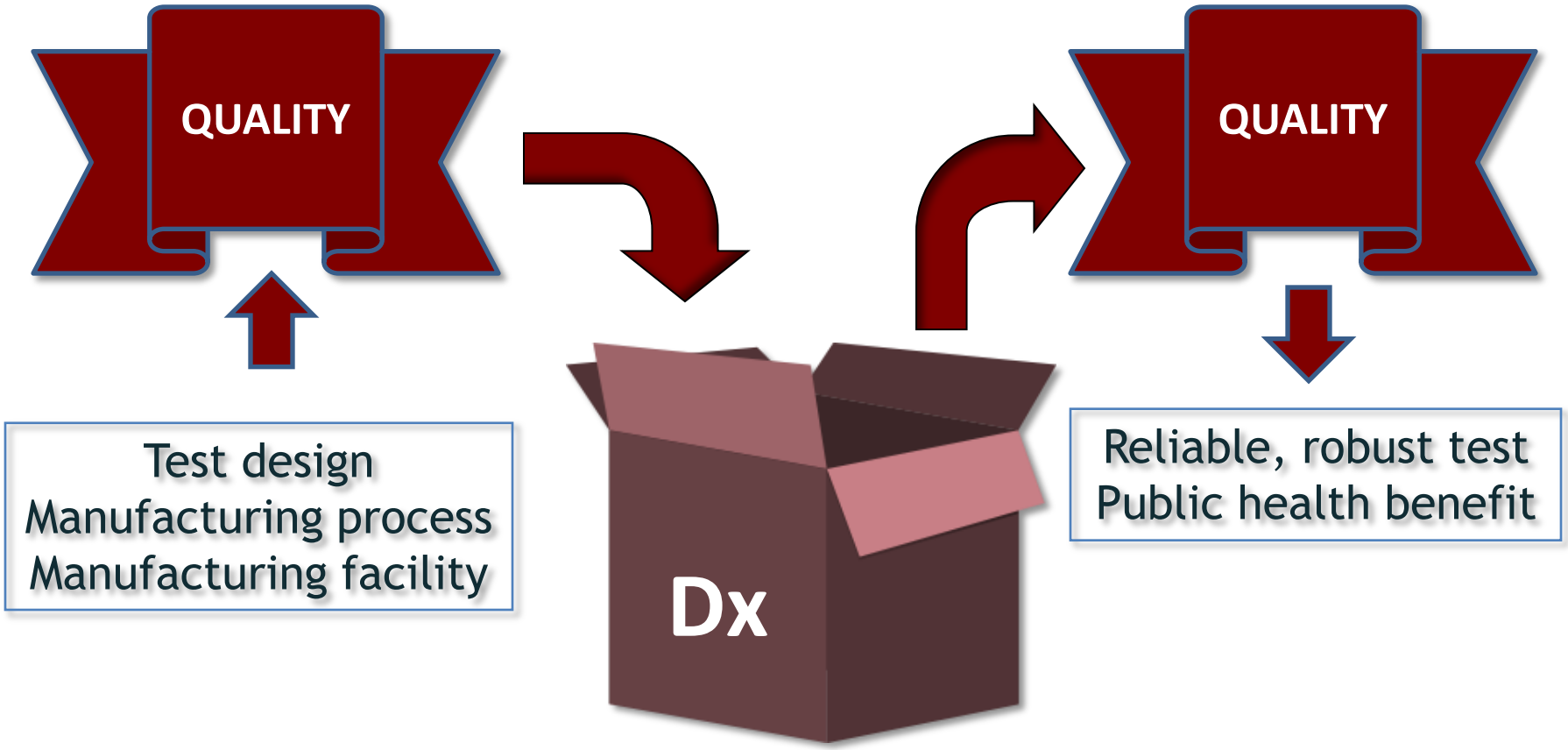
Regulation and Quality Assurance



Out of Control



In Control


QUALITY
QUALITY
Test design
Manufacturing process
Manufacturing facility
Dx
Reliable, robust test
Public health benefit

What is the purpose of regulation?

nsure that products are safe and effective for their intended use.

valuate evidence to support claims.

nforce the regulations.

Applying Regulations: Ensure and Evaluate

- Pre-market: Deciding whether to allow use of a product
  - Documentation review
  - Inspections
  - Additional studies?
- Post-market: Monitoring how well the product performs after approval
  - Active: Lot testing, sentinel sites, EQA
  - Passive: User reports

Applying Regulations: Enforce

QA

PRODUCT

- Consistent performance
- Trust in results
- Public health benefit
- Optimized use of resources

DISINCENTIVES
CONSEQUENCES

REGULATIONS

Legal action
Removal from list
Etc.

Report of the 1st African Regulatory Forum on Medical Diagnostics held 24-26th July 2013, Nairobi, Kenya

TWG 1 Common Registration File

Goal: adoption of a Common Registration File for IVD Medical Device using CD4, HIV viral load and early infant diagnosis as examples

Activity	Time	Milestone
Compare already existing CRFs	3 months	Comparison of CSDT, STED and ALADDIV, etc
Develop draft CRFS based on indication and setting of use CD4/VL/EID	6 months (2nd Forum)	Draft CRF
Country consultations	12 months (3rd Forum)	countries adopting CRF

HOW TO REVIEW:
GOOD REVIEW PRACTICE

(ASIA PACIFIC ECONOMIC COOPERATION REGULATORY HARMONIZATION STEERING COMMITTEE [APEC RHSC])

Good Review Practices

- Definition
  - Documented best practices for any aspect related to the process, format, content, and/or management of a medical product review
- Goal
  - Promote timeliness, predictability, consistency, transparency, clarity, efficiency, and high quality of the content and the management of reviews
- Mechanism
  - Development of review tools (e.g., SOPs, templates) and reviewer learning activities (e.g., training courses, mentoring, orientation packages, discussion sections)
  - Evaluate and update on an ongoing basis

Principles of a Good Review

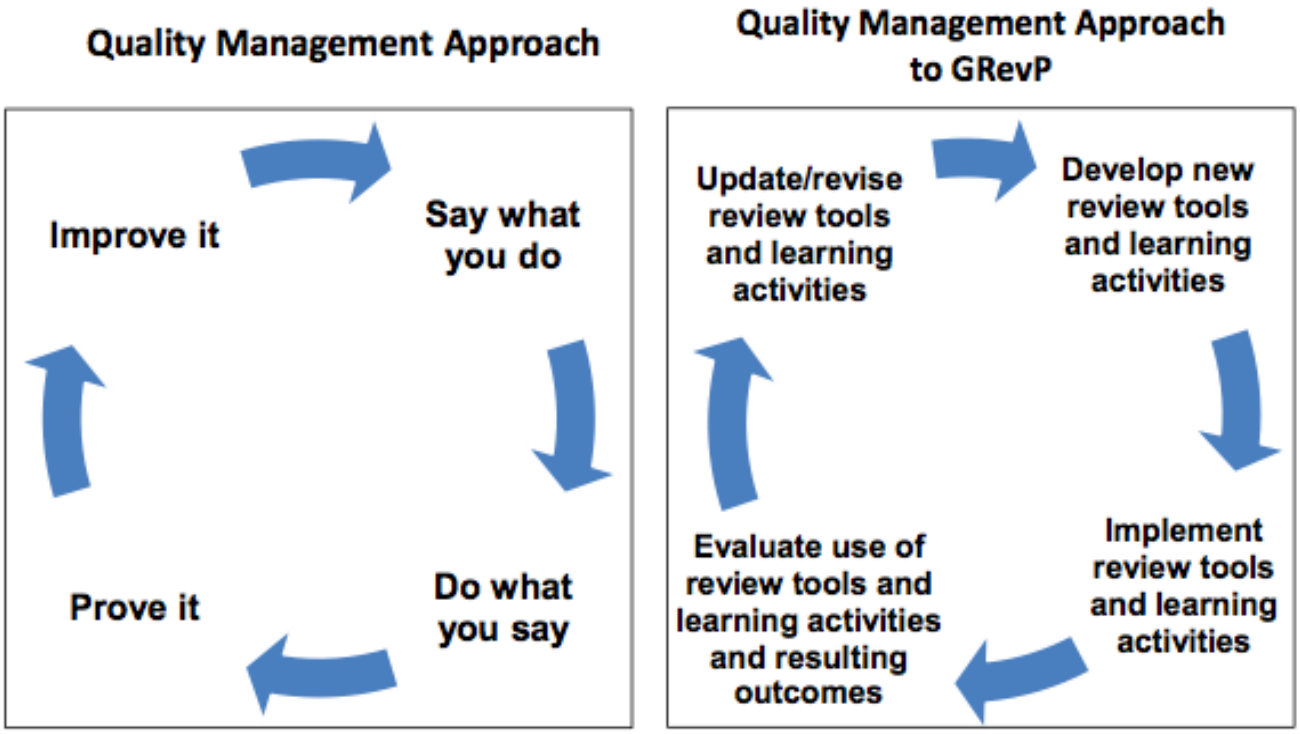
- Evidence-based
  - Scientific and state-of-the-art
- Utilizes critical analyses
  - Assesses scientific integrity, relevance, and completeness of data, labeling, and interpretation
- Identifies signals
  - Highlights areas of concern
- Investigates and problem-solves
  - Devise and recommend critical solutions and efficient alternatives where needed
- Makes linkages
  - Integrated analysis across all aspects of an application

Principles of a Good Review, cont.

- Considers context
  - Proposed conditions of use and storage, including perspectives from healthcare professionals and other Ras
- Involves consultation
  - Internal and external
- Balanced
  - Objective and unbiased
- Thorough
- Well-documented
  - Professional, well-written, clear, neutral, respectful

Activities Critical to Good Review Practice: Managing the Review

- Project management
- Quality management



Activities Critical to Good Review Practice: Managing the Review, cont.

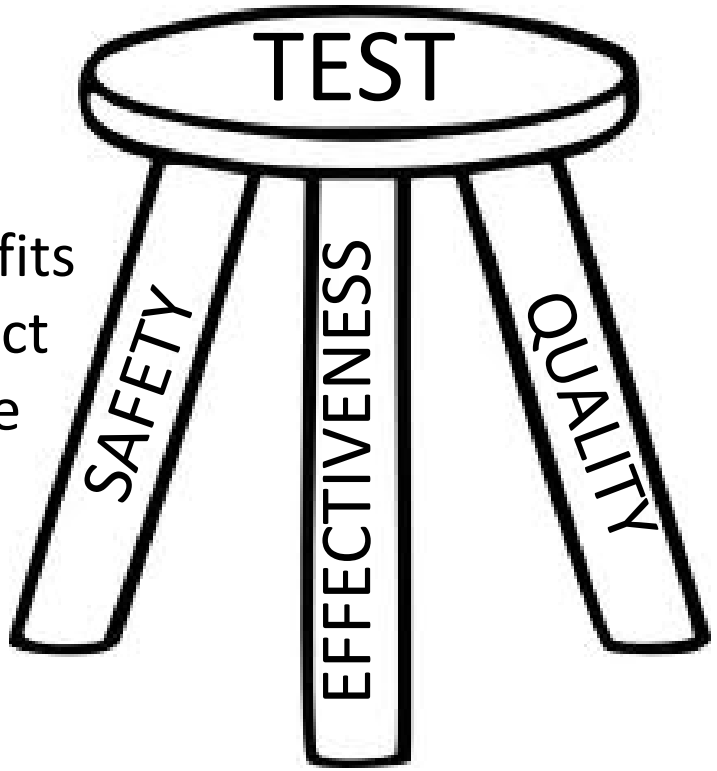
- SOPs, guidances, checklists, and templates
- Communication
  - Intra-Agency
  - Inter-Agency
  - With the applicant
  - With the public

Activities Critical to Good Review Practice: Other

- Personnel competencies and training
  - Reviewer training
  - Critical thinking
  - External experts
  - Collaboration and leveraging
- Conducting the review
  - Defining a review strategy
    - Public health priority of product
    - Understanding other RAs action on the application
    - Understanding specific intrinsic and extrinsic factors
    - Assessment of submission quality
    - Identification of major scientific questions and their possible resolution
  - Evidence-based review with a risk-benefit result

ELEMENTS OF A COMMON REGISTRATION FILE FOR PAHWP

The Foundation



Do the benefits of the product outweigh the risks?

Is the product designed properly?
Is the manufacturing process under control?

Does the product do what it is supposed to do?

Common Registration File

- Based on principles used by WHO prequalification of diagnostics for dossiers and GHTF Essential Principles

IMDRF International Medical Device Regulators Forum

PROPOSED DOCUMENT

Title: IVD Market Authorization Table of Contents

Authoring Group: Regulated Product Submissions Table of Contents Working Group

Date : 9 September 2013

- Listing of common and regional IVD submission content for IMDRF members
  - US, Canada, EU, Japan, Australia, Brazil

Comparison of Proposed Common Registration File to IMDRF TOC

WHO PQ Element	IMDRF TOC Chapter
Dossier format	1
Product information	2
Design and manufacturing	2
Product performance	3, 4
Labeling	5
Commercial history	2
Regulatory history	2
Quality management system	6A, 6B
Essential principles checklist	Indirect

REVIEW OF SAFETY AND QUALITY CONSIDERATIONS FOR POC CD4, VIRAL LOAD, AND EID ASSAYS

Review Questions for POC CD4, VL and EID Tests

- Product information
  - Are the intended use and indications for use consistent with POC use?
- Design and manufacturing
  - Has the test been designed for POC use?
  - Appropriate specimen type?
  - Detailed manufacturing information specific to test
- Product performance
  - Covered in a separate talk
- Labeling
  - Is the labeling consistent with the intended use population?
- Commercial history and regulatory history
  - If previously RA approved, is this exactly the same product made at the same manufacturing facility using the same procedures and equipment?

Discussion

- Staged implementation of Good Review Practices for IVDs
- Adopting WHO PQ product dossier elements for PAHWP Common Registration File as a pilot