Federal Agency for Medicines and Health Products

Admission of the MAHs or sponsors of clinical trials to electronic reporting

Brief outline

In this section, it is described how a MAH/sponsor of a clinical trial can obtain agreement for electronic submission of Individual Case Safety Reports (ICSRs) and SUSARs (Suspected Unexpected Serious Adverse Reactions).

The MAHs and sponsors of clinical trials are encouraged to start testing with the FAMHP.
The software used by the Agency is the EudraVigilance system, edition for Member States, version 7 ("EudraVigilance memberstates Edition" version 7) - quite comparable to the system of the EMEA EudraVigilance.
The management of the local system EudraVigilance of the FAMHP is one of the tasks of the division "Vigilance" headed by Thierry Roisin (thierry.roisin@fagg-afmps.be). This division is part of the Directorate General Post Authorisation under responsibility of Vanessa Binamé.

The EudraVigilance application supports transmission and reception of ICSRs in XML format in compliance with recommendations ICH E2B (M), M1 and M2 (M) (DTD version 2.1) (www.ich.org). The MedDRA terms used need to be the current terms in the most recently published version of that terminology. For more information, please visit MSSO website (www.meddramsso.org). The language accepted by FAMHP for ICSR and SUSARs electronic transmission is English.

Within the Agency, there is only one EudraVigilance system that receives and sends spontaneous notifications as well as from clinical trials for both authorized and non-authorized medicinal products.
The notifications concerning authorized drugs are processed by the "Vigilance" (DG POST Authorisation) division; notifications regarding unauthorized drugs are processed by the "R&D" (DG PRE Authorisation) division.

The business rules for the FAMHP application are the same as those for the system of the EMEA (NOTE FOR GUIDANCE EudraVigilance HUMAN VERSION 7.0 PROCESSING OF SAFETY MESSAGES AND INDIVIDUAL CASE SAFETY REPORTS (ICSR) (EMEA/H/20665 / 04/Final)).
This means that one should not expect to encounter major problems when testing with FAMHP if the MAH or the sponsor has successfully completed the EudraVigilance test program with the EMEA.

Why performing a test phase in EudraVigilance?

The purpose of the EudraVigilance testing is to ensure that organisations, which have a pharmacovigilance system established can support the electronic reporting of Individual Case Safety Reports (ICSRs) in compliance with the ICH standards as referred to in Volume 9A of The Rules Governing Medicinal Products in the European Union, Part III 'Guidelines for MAHs, Competent Authorities and the Agency on Electronic Exchange of Pharmacovigilance Information in the EU'.
Furthermore, the purpose of the testing is to ensure that the ICSRs transmitted to EudraVigilance are of sufficient quality to facilitate the EU pharmacovigilance.
Attention will be paid at national level, especially, to the encoding of the information in the specific EudraVigilance "fields, as explained in the NOTE FOR GUIDANCE EudraVigilance HUMAN VERSION 7.0 PROCESSING OF SAFETY MESSAGES AND INDIVIDUAL CASE SAFETY REPORTS (ICSR) (EMEA/H/20665 / 04/Final).

Requirements for acceptance in the testing phase for electronic reporting of the ICSRs and SUSARs to the FAMHP.

Any MAH or sponsor of a clinical trial who is candidate to start the test procedure for the electronic transmission of the ICSRs and SUSARs to the FAMHP must first register in the system of the EMEA EudraVigilance.

He must have successfully completed the transmission tests of electronic system transmission in the EudraVigilance test environment at the EMEA.
His organisation must have a code of identification - namely "OrganisationID" – for the Production Environment at the EMEA.

Procedure of the test phase with the FAMHP

The test phase includes several steps :

1. The information listed below must be sent by e-mail to : adrs-mah@fagg-afmps.be :
   - A. The name, address, e-mail and phone number of the contact person who will perform the tests :
     - If the company is international, this person may belong t the parent or any non-Belgian subsidiaries
     - this person can also belong to an organisation other than that for which the tests are done
   - B. The contact data of the local person responsible for pharmacovigilance in Belgium or the sponsor of clinical trials to which the letter of "acceptance for the "in production" electronic reporting of ICSRs and SUSARs to the FAMHP" will be sent (waiver: see below) (name, company, address, e-mail);
   - C. A statement on the status concerning the electronic reporting to the EMEA (i.e. that the candidate for the test sends the reports "in production" in EMEA) that the candidate for the test is able to send to EMEA's EudraVigilance system all the reports of adverse reactions that did not occur in Belgium, but that under current legislation (for vigilance and for clinical studies) should still be sent to the FAMHP.

The FAMHP has the possibility to view the reports via the EudraVigilance system.

D. The data of the organisation that is responsible for the electronic transmission of the ICSRs and the SUSARs to the FAMHP. The data relating to your organisation are available on the EudraVigilance website (https://EudraVigilance.ema.europa.eu/human/restricted/PublicView/list2.asp# after login).

2. The FAMHP sends an acknowledgment of receipt of the information contained in paragraph 1 and its approval. The candidate for the test will be invited to perform the test.

3. Practical test: Phase I: by e-mail: the FAMHP will test the coding information from the notifications under the E2B-format.

Note: Since the test environment of the EudraVigilance system is not operational, the FAMHP can not test the electronic transmission in the test system.

Whoever performs the test must send the CIOMS form (pdf) and the XML file (electronic version) of 10 "test" cases to the FAMHP (adrs-mah@fagg-afmps.be). These cases must meet the following conditions:

1./ They need to include the case scenarios that the EMEA requires, i.e.
   1. a report of a reaction that had a fatal outcome: the "cause of death" and "autopsy" should be completed;
   2. a follow-up report;
   3. a report in which the "patient's medical and drug history" are completed;
   4. a "parent-child" report;
   5. a "nullification" report;
   6. a report in which the "worldwide unique safety report number (A.1.10)" is different from that of your organisation (for example, that of the Authorities or from another organisation) or in which "Other sender's case report number (A.1.10.2)" is different from that of the "sender's safety report unique identifier (A.1.0.1)";
   7. a report of an adverse reaction observed in a clinical non-interventional study (observational);
   8. a report of an adverse reaction observed in a clinical interventional study ;
   9. a report from literature;
   10. a report in which the column "report duplicate (A.1.11.1)" is completed;

2./ The events, described in the cases, do not need to have occurred in Belgium.

3./ The FAMHP prefers real or realistic cases which meet these scenarios and which are different from the 10 "test" cases that were used for testing with the EMEA.

The following table should also be attached to the e-mail in Word format :

Test-no.	Test description	CIOMS Mrf control no.	Safety report ID
1	Fatal report with cause of death and autopsy sections filled in		
2	A follow-up report		
3	A report with patient's previous medical and drug history completed		
4	A parent child report		
5	A nullification report		
6	A report in which the "worldwide unique safety report number (A.1.10)" is different from that of your organisation (for example, that of the Authorities or from another organisation) or in which "Other sender's case report number (A.1.10.2)" is different from that of the "sender's safety report unique identifier (A.1.0.1)"		
7	A non-interventional study report		
8	An interventional study report		
9	A literature report		
10	A report with section report duplicate (A.1.11.1) completed		

4. The FAMHP will inform the MAH or the sponsor of clinical trials upon receipt of appropriate "testcases" and indicate when a result can be expected.

5. The FAMHP shall evaluate the testcases and inform you of its conclusion. The scenarios may include:
   A. All tests are good: the testing organisation can go into production.
   B. There are minor errors in the coding of the information: the testing organisation will be informed and will be invited to consider these errors in future reports; it may go into production but must continue, for the first production reports, to send CIOMS forms also by e-mail.
   C. The test result requires a correction of some or all of the "test" cases; the testing organisation can not go to the next stage of the test phase.

6. Practical test: Phase II: In the "production" environment of the system EudraVigilance: verify that the electronic transmission takes place between the organisation and FAMHP.

NOTE: The FAMHP only receives reports of adverse reactions occurring in Belgium with authorized or unauthorized drugs and those that are spontaneously reported or in clinical trials.

As soon as the MAH has to send a Belgian report to the EudraVigilance system of the FAMHP, he may do so. He must inform the FAMHP for the first case or until the transmission of the case to the FAMHP is successful. This can be done preferable by e-mail or also by phone (+32.2.524.83.73).
The data of the FAMHP as "receiver" of your Belgian report within the EudraVigilance system is in the column "For your information". This procedure must be followed for the first 3 reports.
The testing organisation, who has received an A assessment, will receive during this period a waiver (*).
The testing organisation, who has received a B assessment, will receive a "waiver" after a positive result after the evaluation of the coding of at least 3 Belgian reports.

(*) This waiver exempts the MAH from sending all non-Belgian reports to the FAMHP, provided that they are available for the FAMHP in the EudraVigilance system of EMEA. This

letter is also the official proof that the MAH is authorized to access to the “production” environment of the EudraVigilance system of the FAMHP.

Note
Please mention the subject in all e-mails regarding this procedure "Company Name: electronic reporting to the FAMHP”.

For your information

The contact details of the FAMHP via the "EudraVigilance gateway” (°) are the following:

Organisation Name:	Federal Agency for Medicines and Health Products
Street:	Victor HORTA Place, 40 - BP 40
City:	BRUSSELS
Postal Code:	B 1060
Area/State:	BELGIUM
Country:	Belgium

Organisation Identifier for production: AFIGP

The information will appear in the "acknowledgements" (acknowledgements of receipt of an electronic notification) which are sent by the EudraVigilance system of the FAMHP.

(°) You can find more information on the EudraVigilance website : EudraVigilance.ema.europa.eu.