Risk based approach – what does it mean?

J. Seebeck

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Risk based approach – definition

- Methodology that allows to prioritise activities based on a previous analysis of data
## Risk based approach – definition

<table>
<thead>
<tr>
<th>Conventional approach</th>
<th>Risk based approach</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Contra</strong></td>
<td><strong>Pro</strong></td>
</tr>
<tr>
<td>• No priorisation</td>
<td>• Allows prioritisation based on highest risk</td>
</tr>
<tr>
<td>• Requires many resources</td>
<td>• Efficient, less expensive</td>
</tr>
<tr>
<td>• Expensive, inefficient</td>
<td>• Identifies risks faster</td>
</tr>
<tr>
<td>• Slow</td>
<td></td>
</tr>
<tr>
<td><strong>Pro</strong></td>
<td><strong>Contra</strong></td>
</tr>
<tr>
<td>• Complete</td>
<td>• Incomplete</td>
</tr>
<tr>
<td>• Process simpler</td>
<td>• Data collection and analysis required</td>
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</tbody>
</table>
1. Define risks
2. Collect data
3. Prioritise/rank
4. Act on risks
5. Measure success
6. Adapt model
Application of risk-based approaches

- PV Inspections (MHRA)
- Clinical trial monitoring (EMA, FDA, Industry)
Good Pharmacovigilance Practice: Risk-based inspections

In this section...
- Background
- Risk-based inspection process
- Compliance report
- Inspection process

Background
Over the past few years, in the UK there have been significant developments in inspection risk management and the strategies of a number of regulators were reviewed by the MHRA.

It is considered that the scope, frequency and depth of inspections should be dependent on how the regulated organisation takes responsibility for compliance with the regulations. While the company or organisation has always had legal responsibility for compliance, the notice of inspection has for some been a trigger for...
MHRA – risk based inspections

• Implemented 2009
• Data collection via Compliance Report (per PV-System)
• Priorisation / ranking drives frequency of future inspections
• If Compliance Report is not completed, the scoring system will default to the highest risk score
• CR submitted via special email address
• MHRA provides feedback on scores
Compliance Report - sections

1. General admin information
2. Location of PSMF
3. Marketing of products with the UK
4. License Information
5. Changes to the PV system
6. Pharmacovigilance activities
7. Compliance expedited reporting
8. QPPV turnover
5. Changes to the PV system

• Section 5.1: number of licenses increased due to change of ownership?
• Section 5.2: integration of two PV systems due to mergers acquisitions?
Risk-based approaches
Clinical Trials
Regulatory background

EMA

Guidance for Industry

Oversight of Clinical Investigations — A Risk-Based Approach to Monitoring

FDA
Conventional (on site) monitoring

- CRA (fixed schedule)
- Monitoring visit
- SDV etc
- Report

Up to 30% of total cost (CT)
Risk-based (centralized) monitoring

*Start: Analysis of data

CRA (flexible schedule)

Reduced costs, better results

Monitoring visit (based on prioritisation)

*Requires upfront definition of KPI, thresholds etc
Example criteria indicating site problems (relative to other sites)

- Slow recruitment of patients
- ICF not completed
- Lab samples late
- CRF completion late
- CRF completion incomplete
- Protocol deviations
- Invariable data (fraud ?)
Increase monitoring intensity for...

- Complex over simple trials
- During the initial phase of a trials
- In regions with weak health systems
Risk based approach in PV?

• What is most important to you?
  – Reporting compliance
  – Case quality
  – Safety review (signal detection)
  – Risk minimisation
  – PSMF
  – QMS (procedures + training + improvement)
  – Resource management
  – Technical systems, validation
  – A certain product
Thank you for your attention – Q?