Post Prequalification monitoring activities

DCVMN meeting
Shanghai, China  March 2015
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Post-PQ monitoring

- Variations
- Prequalified vaccine annual reports
- Reassessment
- Targeted testing of vaccine lots
- Monitoring and responding to quality and cold chain complaints
- Responding to reports of AEFI s
- Clinical issues
Variations (1)

- Some variations require approval by or notification to WHO before implementation for batches supplied through UN agencies.
- Some variations can be reported in the PQVAR only.
- WHO will inform UN procuring agencies of variations affecting presentations or indications.
- WHO webpage updated, as required.
Variations (2)

- Manufacturer should submit:
- Justification of the variation
- Documentation supporting the variation
- Timelines for implementation
- Approval by the National Regulatory Authority

- Additional information may be requested by WHO
Prequalified Vaccine Annual Reports (PQVAR)

- A summary of changes/variations to the product(s) that have been implemented since the previous annual report along with copy of NRA approval
- Testing results from the ongoing stability programme
- Production and distribution data.
- GMP inspections performed since the previous annual report.
- A summary update on implementation of post-PQ commitments
- Periodic Safety Update Report
PERIODICITY of REASSESSMENT Is Risk Based

- Information from PQVARs including:
  - Variations implemented
  - Rejection of batches internally or by NRA
  - Interruptions to production
  - PSUR
- Quality Complaints and AEFI s received
- Information from NRA, including inspection reports
- Targeted testing program results
- Time since previous re/assessment
- Contribution of vaccine to UN supply
REASSESSMENT EVALUATION ON PRI NCIPLES

Reliance on NRA

Verification of GMP compliance (site audit)

Targeted testing results plus specific testing if required

Update information on production and QC

Monitoring field performance
Reassessment Process

- Review of updated PSF
- Targeted testing or specific testing of lots
- Monitoring for failure to meet specifications
- Consultation meeting with NRA
- Site audit to manufacturer jointly with NRA
Product Summary File

Manufacturer

PSF

Composition & Production & QC

Stability & Clinical data

UN tender

Premises

QA System

Equips

Organization

Product
Targeted testing program

- PQ approval letter specifies samples to be retained by manufacturer from each batch supplied through UN agencies.
- Each year WHO requests manufacturers to supply a list of batches supplied to UN agencies.
- WHO chooses batches for testing and requests samples, lot summary protocols and the NRA/ NCL release certificates.
- Bulk, reference materials may be required.
- In the event of failure to meet specifications, WHO will inform manufacturer, investigate further as required and report to procuring agencies and NRA of record for the vaccine.
Vaccine quality and cold chain complaints
Main reasons
## Reasons (1)

### VACCINE ARRIVAL REPORT (VAR)

This report is to be filled in by authorized staff, ratified by the Store Manager or the EPI Manager, and forwarded to UNICEF within 3 days of vaccine arrival. Use one report for each vaccine in the shipment.

<table>
<thead>
<tr>
<th>COUNTRY</th>
<th>NIGERIA</th>
</tr>
</thead>
<tbody>
<tr>
<td>REPORT No.</td>
<td>N115672/KI/18.07</td>
</tr>
<tr>
<td>Place, Date and Time of Inspection</td>
<td>Lagos, 18.07.18 (10:45 AM)</td>
</tr>
<tr>
<td>Name of Cold Store, Date and Time vaccines entered into cold store</td>
<td>N/115672 Kola company, 18.07.18</td>
</tr>
</tbody>
</table>

### MAIN DOCUMENTS

<table>
<thead>
<tr>
<th>Document</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Declaration of goods</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Airway Bill</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Packing List</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Invoice</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Release Certificate</td>
<td>Yes</td>
<td></td>
</tr>
</tbody>
</table>

### PART II: FLIGHT ARRIVAL DETAILS

<table>
<thead>
<tr>
<th>AWB Number</th>
<th>Destination</th>
<th>Flight No</th>
<th>ETA</th>
<th>Actual time of arrival</th>
</tr>
</thead>
<tbody>
<tr>
<td>347430005307</td>
<td>Lagos, Nigeria</td>
<td>NA</td>
<td>NA</td>
<td>2018-07-18</td>
</tr>
</tbody>
</table>

### PART III: DETAILS OF VACCINE SHIPMENT

<table>
<thead>
<tr>
<th>Purchase Order No.</th>
<th>Consignee</th>
<th>Vaccine Description</th>
<th>Manufacturer</th>
<th>Country</th>
</tr>
</thead>
<tbody>
<tr>
<td>347430005307</td>
<td>N115672 Kola company</td>
<td>Polio (Sabin)</td>
<td>Aventis Pasteur</td>
<td>France</td>
</tr>
</tbody>
</table>

### Vaccine Cold Chain Monitor

- **Polio**: Use within 3 months
- **Measles & Yellow Fever**: Use within 3 months
- **DPT & BCG**: Use within 3 months
- **TT & DT & Hepatitis B**: Use within 3 months

### Notes:

- **Shipping Notification** is required.
- **Comments**: No comments.

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**Monitoring Mark**

- **Index**: A, B, C, D
- **Date of Dispatch**: 2018-07-18
- **Date of Expiration**: 2019-07-18
Reasons (2)

Storage of the vaccine
Reasons (3)

Manufacturing

WHO PREQUALIFICATION PROGRAMME
Reasons (4)

OOS testing results: Declared by the manufacturer

Change of appearance during storage

Recall

Loss of potency

Recall

Accelerated stability studies

Follow up
Reasons (5)

- **OOS testing results: Notified by the NCL**
- **Failure to meet appearance specifications**
  Release on hold
- **Failure to meet vaccine specifications**
  Eg sterility, potency
Reasons (6)

- OOS testing results: Identified during the WHO targeted testing program

- Failure to meet vaccine specifications
  Eg potency
Reports of AEFI

Main reasons 2001-2011
Reasons (7)

- **Increased reactogenicity**
  - License and PQ withdrawal

- **Coincidental/ non related**

- **Programmatic**
  - Vaccine handling procedures
  - Change of the inserts, training material and mock up samples
  - Other programmatic reasons → Training needs
Monitoring of complaints (1)

- **Reported by:**
  - Manufacturer
  - UN procuring Agency
  - Regional office/ Countries (EPI)
  - NRAs/ NCL of user countries
  - NRA/ NCL of producing country

- **Examples of types of complaints**
  - Failure to meet specifications eg appearance
  - Failure to meet specifications during testing by NCLs of the user countries
  - Cold chain problems
  - VVM change of colour
Monitoring of complaints (2)

Process

- WHO may request additional information to the complainant eg. lot numbers, manufacturer, packaging, pictures of the samples, information on the storage conditions and VVM status.

- In case of complaints from NCLs different from the NCL exercising the regulatory oversight, review of the testing results and related documentation such as validation reports, SOPs, control charts is needed for WHO review.

- Manufacturer is requested to initiate investigation that includes review of the batch records of the lots involved in the complaint, review of the shipping procedures and monitoring devices and retesting of retention samples if applicable.

- Report of the investigation and actions performed by the manufacturer should be submitted to WHO and copied to their NRA.
Monitoring of complaints (3)

Process

- NRA/NCL of the country of origin is requested to support WHO on the investigations being performed by the manufacturer and to confirm acceptability of the investigation results/report.

- NCL may be requested to provide testing results performed during the lot release. Retesting of retention samples may be requested if relevant.

- In addition the manufacturer is requested to provide:
  - List of lots supplied to the complainant country
  - List of countries where the vaccine lots involved were distributed.
  - Number of doses supplied to each country.
  - Copy of the LSP
  - Complaints received from other countries and outcome of the investigations performed
Monitoring of complaints (4)

Process

- WHO may perform independent testing after review of the relevant information including review of the temperature monitoring devices, review of the testing results and related data.
The complainant will be informed of the outcome of the investigations.

Depending on the complaint WHO may inform the relevant agencies, Regional Offices and countries procuring the same lot of the vaccine when the complaint is received, during the investigation and at the end of the investigations.

The information may be posted in the WHO webpage.
Monitoring of AEFIs (1)

Two components:

1. Safety perspective (Safety group)
   - Field investigation
   - Review of other reports of AEFIs
   - Causality assessment
   - Recommendations derived from the investigations

2. Quality perspective (PQ team)
   - Same process as for complaints.
Monitoring of AEFI(s) (2)
Testing as part of AEFI(s)

Testing of a vaccine lot recommended
if the clinical and/or epidemiological information about the AEFI case(s) indicates a potential vaccine quality problem and after review of the relevant manufacturing and control documentation. The review of the batch records by the manufacturer and the NRA exercising the regulatory oversight of the vaccine allows for detection of any potential deviation during the manufacturing process that may impact on the quality of the vaccine.

The outcome of the investigation of AEFI cases would indicate
if testing is required
If so which test(s) is (are) needed.
Monitoring of AEFI’s (3)
Testing as part of AEFI’s

Depending on the tests to be performed, the number of un-opened containers* (sampled from the field and from the manufacturer) required for testing to be statistically calculated, so that it is powered enough to draw definitive conclusions about the relevant lot.

In the event that testing is needed, WHO will contact one of the WHO contracted laboratories that can perform the test and subsequently inform the national authorities of the number of vaccine vials to be sent as well as other logistic arrangements. Additional expertise on testing may be needed

* Special tests opened vials
Other issues of concern (1)

Porcine circoviruses detected in 2 rotavirus vaccines

Management from different perspectives:
- Meetings/TC with the relevant NRAs
- Working group on cell substrate
- GAVCS
- Ad Hoc committee

Benefit/ risk continued to be very favourable
Other issues of concern (2)

Suspension of the supply of pentavalent vaccine
- Analysis of lots already supplied: Impact?
- Analysis of lots in quarantine
  - Release of lots acceptable for supply
- Analysis for restarting the manufacturing of new lots
  - Additional CAPAs taken by the manufacturer

Strong collaboration from the NRA

Communication with relevant UN procuring agencies
Other issues of concern (3)

Addressing programmatic issues:

VVM category
Cold chain volume of current PQ vaccines

Addressing quality of PQ vaccines produced by manufacturers recalling other non PQ vaccines

Addressing quality of the outsourced bulks?
Communication issues

Increased and prompt communication to address issues of concern

Manufacturers
NRAs
Countries/Regional offices
UN agencies
Investment companies
Individuals
Webpage: Information and Qs and As document
Managing complaints/ AEFI s

Training needs identified

**EPI managers:**
Training materials  
Mock up samples  
Shake tests  
Monitoring devices  
Quarantine and recall of vaccines

**NCLs**
Performance of the tests

**Safety team**
Vaccine safety investigations

Follow up by NRA
Post-prequalification activities
- clinical
Annual Reporting for clinical Prequalified Vaccine Annual Report (PQVAR)

Variations
summary of changes/variations (minor)
Those requiring "approval before implementation" are assessed separately

Implementation of post-prequalification commitments
Results/update of ongoing/planned clinical trials/observational studies
Post-marketing surveillance commitments

Periodic Safety Update Report (PSUR)
Reassessments

Evaluation of the updated Product Summary File (PSF)
Ideally only sections indicated as changed will be evaluated…
PSURs and Vaccine Prequalification

PSURs can be received by WHO Vaccine PQ Secretariat in two situations:

Before prequalification
In case of new applications for PQ of vaccines already marketed for more than a year

After prequalification
PSURs should be submitted annually as part of the Prequalification Vaccine Annual Review (PQVAR) documentation
PSUR format

No specific format required
The format required by the National Regulatory Authority (NRA) of reference is accepted by WHO

Content is what matters
ICH format is accepted
PSUR evaluators

WHO staff member and/or
External expert(s) contracted by WHO

Two for the clinical evaluation of a new application of a vaccine for PQ

PSUR evaluation is just one component

Usually one in case of annual review of novel vaccines

PSUR evaluation is the sole purpose

External experts have to

sign a Confidentiality Agreement

fill in and sign a Declaration of Interests
Evaluation of the PSUR - 1

1. Background information on the vaccine product
   1.1 Composition of the vaccine
   1.2 Recommended schedules and routes of administration
   1.3 Marketing authorization status
Evaluation of the PSUR - 2

2. Presentation of PSUR(s)
   2.1 General information
   2.2 Serious unlisted adverse events
   2.3 Non-serious unlisted reported adverse events
   2.4 Serious and non-serious listed events
      2.5 Medically unconfirmed cases
      2.6 Clustering
   2.7 Other safety information

3. Overall safety evaluation, conclusions and recommendations
All dosage forms, formulations and indications for a given vaccine should be covered in one PSUR. Within a single PSUR separate presentations of data may be appropriate for different dosage forms, indications, populations (e.g. children vs. adults), schedules (e.g. age at administration, booster dose) and routes of administration.
Additional considerations - 2

For combination vaccines a separate PSUR is required even when its individual components, alone or in combination, are marketed individually

e.g. measles-mumps-rubella vaccine, measles-rubella vaccine, measles vaccine etc…produced by the same manufacturer