

PHARMACOVIGILANCE PASSIVE SURVEILLANCE

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University of Namibia, Windhoek, ISPE & ISPE
African Chapter
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Pharmacovigilance Methods

- Passive Surveillance
- Stimulating Reporting Systems
- Active Surveillance
- Comparative Observational Studies
- Targeted Clinical Investigations
- Descriptive Studies

ICH Harmonised Tripartite Guideline, Pharmacovigilance Planning EZE, 2004

Passive Surveillance

- Spontaneous Reports
- Systematic Methods for the Evaluation of Spontaneous Reports (Data Mining)
- Case Series



ICH Harmonised Tripartite Guideline, Pharmacovigilance Planning EZE, 2004

Spontaneous Reports

- Passive and voluntary reports
- Definition: **Unsolicited communication** from an individual (e.g., health care professional, consumer) to a company or regulatory authority or other organization (e.g. WHO, Regional Centres, Poison Control Centre) that describes **one or more adverse events in a patient** who was given **one or more medicinal products** and that does not derive from a study or any organized data collection scheme.
- They have a major role in the identification of safety signals once a drug is marketed.

ICH Harmonised Tripartite Guideline, Pharmacovigilance Planning EZE, 2004; FDA 2018

Who should report an adverse effect?

- Every person who experiences or know someone who experience a side effect should report the event to their local health authority and/or manufacturer.
- There is an initiative from the UMC to encourage the reporting of a side effect: take and tell

https://www.youtube.com/watch?v=dkvaYzaZ_Uk



<https://www.youtube.com/watch?v=7x0T7hBnRel>

<https://www.youtube.com/watch?v=x7LJKW3vHk0>

<https://www.who-umc.org/safer-use-of-medicines/taketell/>

Case Report

REPORT OF SUSPECTED ADVERSE DRUG REACTIONS Yellow Card	
<p>1. Name of the patient (if known):</p> <p>2. Date of onset of reaction:</p> <p>3. Name of the drug (include strength and formulation):</p> <p>4. Name of the manufacturer:</p> <p>5. Name of the prescriber (if known):</p> <p>6. Name of the hospital/clinic (if known):</p> <p>7. Name of the patient's general practitioner (if known):</p> <p>8. Name of the patient's pharmacist (if known):</p> <p>9. Name of the patient's dentist (if known):</p> <p>10. Name of the patient's other health care professional (if known):</p> <p>11. Name of the patient's other health care professional (if known):</p> <p>12. Name of the patient's other health care professional (if known):</p> <p>13. Name of the patient's other health care professional (if known):</p> <p>14. Name of the patient's other health care professional (if known):</p> <p>15. Name of the patient's other health care professional (if known):</p> <p>16. Name of the patient's other health care professional (if known):</p> <p>17. Name of the patient's other health care professional (if known):</p> <p>18. Name of the patient's other health care professional (if known):</p> <p>19. Name of the patient's other health care professional (if known):</p> <p>20. Name of the patient's other health care professional (if known):</p>	
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- 49-year old female patient
- Diagnosis: Bipolar Disorder
- Treatment: Antipsychotic medication started one year before the reported adverse events
- After stopping therapy, she developed "dizziness, can hardly walk and feet are going numb"
- Concomitant therapy: not provided
- Outcome: unknown

Principles of Case Evaluation

- Temporal relationship
- Causality assessment-World Health Organization, the Uppsala Monitoring Centre (WHO-UMC):
 - Certain
 - Probable/Likely
 - Possible
 - Unlikely
 - Conditional/Unclassified
- Key factors in causality assessment including, but not limited to
 - Dechallenge/rechallenge
 - Comorbidities
 - Concomitant medications
 - Consistent with pharmacological effects (biologic plausibility)

Drug-Event Causality Assessment

Table 1. The causality assessment checklist

1. Do there strong evidence the other causes?	Y	N	U	S	N/A	Remarks
Does a clinical examination, or laboratory tests on the patient, confirm another cause?	<input type="checkbox"/>					
II. Is there a known causal association with the vaccine or vaccination?						
Is there evidence in the literature that this vaccine(s) may cause the reported event or adverse outcome?	<input type="checkbox"/>					
Is there a specific time relationship between the event and the vaccine or any of the ingredients?	<input type="checkbox"/>					
Administrative error						
Was there an error in prescribing or was substance to occur mistaken for use of the vaccine (e.g. use beyond the expiry date, wrong recipient etc)?	<input type="checkbox"/>					
Was the vaccine (or any of its ingredients) administered correctly?	<input type="checkbox"/>					
Was the vaccine's physical condition (e.g. colour, turbidity, presence of foreign substances etc.) abnormal at the time of administration?	<input type="checkbox"/>					
Was there an error in vaccine reconstitution/preparation by the vaccinee (e.g. wrong product, wrong diluent, improper mixing, improper syringe filling etc.)?	<input type="checkbox"/>					
Was there an error in vaccine handling (e.g. a leak in the cold chain during transport, storage and/or administration, etc.)?	<input type="checkbox"/>					
Was the vaccine administered incorrectly (e.g. wrong dose, site or route of administration, wrong needle size etc.)?	<input type="checkbox"/>					
Administrative anxiety						
Could the event have been caused by anxiety about the immunization (e.g. syncope, hyperventilation or anorexia nervosa)?	<input type="checkbox"/>					
III. (Optional, if "no" to any question in II, was the event within the time window of increased risk?						
Did the event occur within an appropriate time window after vaccine administration?	<input type="checkbox"/>					
III. Is there strong evidence against a causal association?						
Is there strong evidence against a causal association?	<input type="checkbox"/>					
Could the event occur independently of vaccination (background case)?	<input type="checkbox"/>					
Could the event be a manifestation of another health condition?	<input type="checkbox"/>					
Did a comparable event occur after a previous dose of a similar vaccine?	<input type="checkbox"/>					
Was there a pattern in a potential risk factor or risk prior to the event?	<input type="checkbox"/>					
Was there a clear time prior to the event?	<input type="checkbox"/>					
Did the event occur in the post-independence of vaccination?	<input type="checkbox"/>					
Was the patient taking any medication prior to vaccination?	<input type="checkbox"/>					
Is there a biological plausibility that the vaccine could cause the event?	<input type="checkbox"/>					

Y: Yes, N: No, U: Unclassified, S: Suspect, N/A: Not applicable.

Exercise

Provide a comment to each case included in the table:

- 1) Establish the criteria to be used, 2) Do the assessment, 3) Propose next step

Cases	Assessment
Spontaneous report from a physician concerning an 88-year-old male who experienced tongue edema, acute respiratory failure and respiratory acidosis after his 3 rd dose of amiodarone. Patient was also on insulin, naproxen and gentamicin. All events were reported as life threatening.	Med History? Time to event? Concomitant Medications – characteristics? Treatment? Dechallenge? Outcome?
Spontaneous report from a pharmacist related to an 89-year-old male patient who experienced gastric haemorrhage in the last 24 h. He has a medical history of cardiac failure, hypertension, hyperlipidaemia, hyperuricaemia, chronic subdural haematoma. He has been on warfarin for three weeks. Concomitant medications included digoxin, allopurinol, atorvastatin, serotonin and candesartan.	Concomitant Medications – characteristics? Treatment? Dechallenge? Outcome?
Spontaneous report of erythema, disseminated red-bean-sized papules and erythema on chest, abdomen, back and both legs as well as blistering on neck and low back; pyrexia of 38°C, lack of appetite, malaise, chills, arthralgia; conjunctivitis, stomatitis and swelling of lips in a 58-year-old male patient after 4 days on cephalosporin, mefloquine and "Bepidil" (calcium channel blocker). Patient has an ongoing history of alcohol use, paroxysmal atrial fibrillation and inguinal hernia.	Time to event? Concomitant Medications – detailed information? Treatment? Dechallenge? Outcome?

Case Series

- Group case reports that can provide evidence of an association between a drug and an adverse event
- They are generally more useful for generating hypotheses than for verifying an association between drug exposure and outcome.
- Some adverse events are known to be associated more frequently with drug therapy: anaphylaxis, aplastic anemia, toxic epidermal necrolysis and Stevens-Johnson Syndrome

ICH Harmonized Tripartite Guideline. Pharmacovigilance Planning ECE, 2004

Case Series

No reference group; To quantify the incidence of an event/ disease in exposed patients

Exercise

- You receive a case series, analyze the table carefully and decide if the reported event(s) represents a potential safety signal or if you need additional information

Case/ Gender/ Age (yrs)	Major malformation	Minor anomalies	Normal variants	Postnatal defects	Abnormally small body size	Functional anomalies	Ophthalmology	Gestational age (weeks)	Birth weight (kg)	Birth length (cm)	Postnatal data
13812 / 23614	Rotational tortia		Pis plasma valve, bifurcated testis				Asplenia	40 / 38	2700 / 3130	52 / 50	
27816	Pulmonary atresia							31	1325	No info	Twins, preterm
47369	Rotational tortia		Inguinal hernia, bifurcated testis				VA 0.5/5.4, septae	39	3925	45	
27367							VA 0.4/5.5, septations	39	3030	49	
68712		Arrangement of the lumbar vertebrae, femorocondyl defect	Pis plasma valve				Hypertonia, oligospermia	42-46	3900	54	
13818				Hip luxation				40	3580		
69367						Autism	VA 0.5/5.4	41	4378	51.5	
1077								38	1140	39	Hydrocephalus
11740								40	2440	43	Preterm
117710						Growth delay		40	2530	43	SGA
1077								40	2530	43	SGA
107710							VA 0.6/5.0, ventricles	40	3020	50	
1478	Died within 24 hr post delivery		Pis calcaneus valve					31	900	No info	Twins, preterm

*ADD, visual organ defect, systemic, gestational age <37 weeks, VA, visual acuity
 *HSG, heart to assess TE mother
 *HSGa, heart to assess TE mother
 *HSGph, heart to assess TE father
 *Died

Tenatology 66:115-121, 2002

What information is this table providing to you?

Case/Gender/Age (yrs)	Gender of parent with TE	Anomalies in parents with TE	Pregnancy history	Mode of delivery
13M/16	Mo	Thumb hypoplasia	Infection of urinary tract (ab)	Vaginal
23M/4	Fa	Thumb hypoplasia, Duane Anotia, absence of ear canal, presacral tag	Spontaneous abortion	Vaginal
37F/18	Mo	Thumb hypoplasia, Duane Anotia, absence of ear canal, presacral tag	Cervical insufficiency	ECS
47M/9	Mo	Anotia, ear hypoplasia, 6th (Duane), 7th cranial nerve palsy	Maternal tachycardia (antiarrhythmic class II)	Vaginal
57M/7	Mo	Anotia, ear hypoplasia, 6th (Duane), 7th cranial nerve palsy	Maternal tachycardia (antiarrhythmic class II)	Vaginal
67F/12	Fa	Thumb aplasia, hearing loss, Duane	Pneumonia (ab)	ECS
77F/8	Mo	No info	No info	Vaginal
87M/7	Mo	Anotia, 6th (Duane), 7th cranial nerve palsy, hearing loss, VSD, LVH	Spontaneous abortion	Vaginal
97F/7	Mo	Uterine septum defect, hearing loss	Two spontaneous abortions	ECS
107M/16	Fa	No info	No info	Vaginal
117F/10	Fa	No info	No info	Vaginal
127F/8	Fa	No info	No info	Vaginal
137F/10	Fa	Thumb hypoplasia, upper limb malformations	Infection of urinary tract (ab)	Vaginal
147F/9	Mo	Anotia, absence of ear canal, presacral tag	Cervical insufficiency	ECS

*ab, Antibiotic; Duane, Duane syndrome (sixth cranial nerve palsy characterized by a marked limitation or absence of abduction, restriction of adduction, restriction of the globe and narrowing of the palpebral fissure on adduction); ECS, emergency cesarean section; Fa, father; LVH, Left ventricular hypertrophy; Mo, mother; No info, no information; VSD, Ventricular septal defect; TE, Thumbside embryopathy.
 †Siblings, born to same TE mother.
 ‡Siblings, born to same TE mother.
 §Siblings, born to same TE father.
 ¶Deed.

Teratology 66:116-121, 2002

Example

- Literature report of 72 yrs. old female
- History of type 2 diabetes mellitus and hypercholesterolemia treated with 850 mg metformin once daily, 12.5 mg hydrochlorothiazide once daily and 0.2 mg cerivastatin once daily.
- Lab showed normal creatinine and hyperlipidemia, prescriber added 600 mg gemfibrozil.
- After 3 days she was admitted because of chest pain, severe muscle pain. Lab showed increased of serum potassium, serum creatinine and creatine kinase, prolonged PQ-time, severe widening of QRS segment. Patient was treated with glucose, insulin and hemodialysis. Patient improved, potassium decreased and ECG abnormalities disappeared. Patient continued on hemodialysis for 7 weeks until her creatinine clearance reached normal levels.

Nephrol Dial Transplant 2001;16:2418-2419

Case Series of Rhabdomyolysis

Table 1. Patient Demographics

Age (yrs)/ Gender	Height (in.)	Weight (kg)	Body Mass Index (kg/m ²)
74/F	60.5	53.8	22.2
74/M	71.0	107.9	33.2
72/M	59.5	97.3	31.2
65/F	62.0	76.9	31.0
63/M	70.5	106.4	33.2
75/F	57.5	49.3	23.1
59/M	67.0	78.0	26.9
68/M	66.0	54.0	19.2
55/F	63.0	61.0	23.8
59/M	68.0	97.0	32.5
75/F	59.0	53.0	23.6

Cerivastatin-Induced Rhabdomyolysis: 11 Case Reports, Ravnan SL, Locke C, Yee WP, Haase K, Pharmacotherapy 2002;22(4):533-537

Table 2. Concomitant Medical Conditions That Could Increase Risk of Rhabdomyolysis

History of Diabetes Mellitus	History of Hepatic Impairment	History of Renal Impairment	Surgery or Trauma < 30 Days Earlier
No	No	No	No
No	No	No	No
Yes	No	No	No
No	No	No	No
No	No	No	No
No	No	No	No
Yes	No	Yes	No
Yes	No	Yes	No
No	No	Yes	No
Yes	No	No	No
Yes	No	No	No

Information obtained from patients' medical records.

Cerivastatin-Induced Rhabdomyolysis: 11 Case Reports, Ravnan SL, Locke C, Yee WP, Haase K, Pharmacotherapy 2002;22(4):533-537

Table 4. Drug History, Concurrent Therapy, and Scores on Naranjo Adverse Drug Reaction Probability Scale²⁷

Lipid Management History (before hospital admission)	Concurrent Therapy	Naranjo Score ²⁷
Cerivastatin 0.4 mg x 30 days	Captopril, aspirin, felodipine, atenolol, chlorzaldolone	7
Niacin 1 g/day (long term), cerivastatin 0.8 mg h.s. x 28 days	Naproxen, atenolol	7
→ Gemfibrozil 600 mg b.i.d. (long term), cerivastatin 0.4 mg h.s. x 1 wk	Eraluprel, hydrochlorothiazide-triamterene	4
→ Atorvastatin x 3 years, gemfibrozil 600 mg b.i.d. x 1 year, cholestyramine x 33 days, atorvastatin changed to cerivastatin 0.8 mg h.s. x 33 days	Naproxen, propoxyphene, hydrocodone-acetaminophen	4
→ Simvastatin x 2 years, changed to cerivastatin 0.4 mg h.s. x 2 mo, gemfibrozil 600 mg b.i.d. x 21 days	Fosinopril, aspirin, amiodarone, furosemide	4
Pravastatin x 4 mo, changed to cerivastatin 0.4 mg h.s. x 14 mo	Etiololac, aspirin, levotyroxine	7
→ Fluvastatin 40 mg h.s., changed to cerivastatin x 24 days, gemfibrozil 600 mg b.i.d. x 28 days	Felodipine, verapamil, aspirin, insulin	7
Cerivastatin 0.4 mg h.s. x 29 days	Benzazepil, clopidogrel, atenolol, aspirin	7
Fluvastatin (long term), changed to cerivastatin 0.4 mg h.s. x 9 mo	Benzazepil, amitriptyline, nitroglycerin, hydrochlorothiazide-triamterene, clopidogrel	7
→ Cerivastatin 0.8 mg h.s. + gemfibrozil 600 mg b.i.d.	Amlodipine, glyburide, cyclobenzaprine, tramadol	4
→ Cerivastatin 0.4 mg h.s. x 30 days, gemfibrozil 600 mg b.i.d. x 14 days	Nifedipine, atenolol, aspirin, glipizide	4

²⁷Adverse events are defined as 2-9 = definite, 5-8 = probable, 1-4 = possible, and ≤ 0 = doubtful.

Cerivastatin-Induced Rhabdomyolysis: 11 Case Reports, Ravnan SL, Locke C, Yee WP, Haase K, Pharmacotherapy 2002;22(4):533-537

Spontaneous Reports

- Safety reviewers can be alerted to rare adverse events that were not detected in earlier clinical trials or other pre-marketing studies.
- Spontaneous reports can provide important information on at-risk groups, risk factors, and clinical features of known serious adverse drug reactions.
- Issues: Underreporting, incomplete data, selective reporting. It could be impacted by PV-related regulatory activities, media attention, indication of the product, incidence rates can not be generated accurately but reporting rates can be estimated

ICH Harmonised Tripartite Guideline: Pharmacovigilance Planning E2E, 2004, FDA 2018

Postmarketing Safety Reporting Requirements in the USA

- Under 21 CFR 314.80 postmarketing safety reports must be submitted to the agency for the following:
 - 15-day Alert reports: Serious and unexpected adverse experience from all sources (domestic and foreign)
 - Periodic Adverse Experience Reports: Domestic spontaneous adverse events that are:
 - Serious and expected
 - Non-serious and unexpected
 - Non-serious and expected
 - Quarterly for the first 3 years then annually

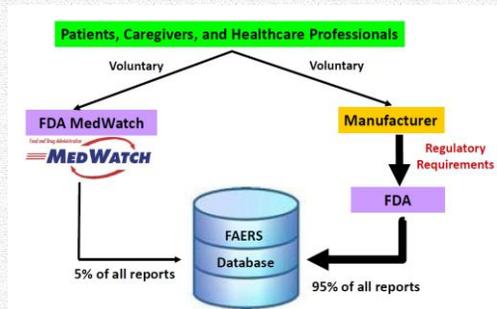
FDA, 2018

FDA Adverse Event Reporting System

- Fully automated computerized database
- Spontaneous reports
- Contains human drug and therapeutic biologic reports
- ~14 million reports since 1969
- Over 1.81 million new reports in 2017

FDA, 2018

Postmarketing Reports Sent to FDA



FDA, 2018

FAERS Strengths

- Can report even if causality is uncertain
- Less restrictive than clinical trials
 - Reports can be submitted for any drug, old and new
 - Entire US population is "eligible"
- Reports emerge from usual healthcare settings
 - Patient and prescriber population more heterogeneous
 - All stages of treated disease
 - Longer duration of use
 - Captures "off-label" use, including diagnosis and dose
 - Co-morbidities, concomitant products and procedures

FDA, 2018

FAERS Example of Output

	Generic Name	SOC	HLT	PT plus Narrow w/ Alg. SMQ	N	EB05	PRR	Prior Assessments
1	Warfarin	Nerv	Central nervous system haemorrhages and cerebrovascular accidents	Embolic stroke	31	50.47	115.309	
2	Warfarin	Nerv	Central nervous system haemorrhages and cerebrovascular accidents	Cerebral infarction	84	28.633	39.106	
3	Warfarin	Renal	Urinary abnormalities	Haematuria	46	11.225	14.259	
4	Warfarin	Gastr	Non-site specific gastrointestinal haemorrhages	Melaena	30	10.839	13.11	
5	Warfarin	Nerv	Central nervous system haemorrhages and cerebrovascular accidents	Ischaemic stroke	29	9.856	24.551	
6	Warfarin	Skin	Skin and subcutaneous tissue disorders	Gangrene of skin	3	2.1	2.0	
7	Warfarin	Skin	Skin and subcutaneous tissue disorders	Rash	300	7.824	8.912	
8	Warfarin	Skin	Skin and subcutaneous tissue disorders	Pruritus	300	7.8	8.857	

FAERS Output for warfarin, PTs, N, EB05/PRR among elderly patients with atrial fibrillation

FAERS Example of Output

	Generic Name	SOC	HLT	PT plus Narrow w/ Alg. SMQ	N	EB05	PRR	Prior Assessments
1	Warfarin	Nerv	Central nervous system haemorrhages and cerebrovascular accidents	Embolic stroke	31	50.47	115.309	Common in the Population
2	Warfarin	Nerv	Central nervous system haemorrhages and cerebrovascular accidents	Cerebral infarction	84	28.633	39.106	Common in the Population
3	Warfarin	Renal	Urinary abnormalities	Haematuria	46	11.225	14.259	Listed/Expected
4	Warfarin	Gastr	Non-site specific gastrointestinal haemorrhages	Melaena	30	10.839	13.11	Listed/Expected
5	Warfarin	Nerv	Central nervous system haemorrhages and cerebrovascular accidents	Ischaemic stroke	29	9.856	24.551	Common in the Population
6	Warfarin	Skin	Skin and subcutaneous tissue disorders	Gangrene of skin	3	2.1	2.0	Potential signal
7	Warfarin	Skin	Skin and subcutaneous tissue disorders	Rash	300	7.824	8.912	Listed/Expected
8	Warfarin	Skin	Skin and subcutaneous tissue disorders	Pruritus	300	7.8	8.857	Listed/Expected

FAERS Output for warfarin, PTs, N, EB05/PRR among elderly patients with atrial fibrillation

FAERS Limitations

- Passive, voluntary surveillance
- Underreporting occurs and is variable from drug to drug and over time
 - Some literature cites 1-10%
 - Actual is unknown so FDA does not assume extent
- Reporting bias exists
- Quality of the reports is variable and often incomplete
- Duplicate reporting of the same case occurs
- Not population-based data source
 - Can not reliably estimate incidence or prevalence
 - Numerator uncertain, denominator can only be projected from drug utilization data

FDA, 2018

FAERS is less useful for:

- Events with high background rates
- Worsening of pre-existing disease
- Issue is beyond the name of the drug
- Comparative incidence rates
- Comparing drugs in the same class
- Adverse events that could also be manifestations of the disease for which the drug is indicated
- Reporting biases

Factors Affecting Reporting

- Media attention
- Litigation (class action lawsuits)
- Nature of the adverse event
- Type of drug product and indication
- Length of time on market
- Extent and quality of manufacturer's surveillance system
- Prescription or over-the counter (OTC) product status
- Reporting regulations

FDA, 2018

EudraVigilance

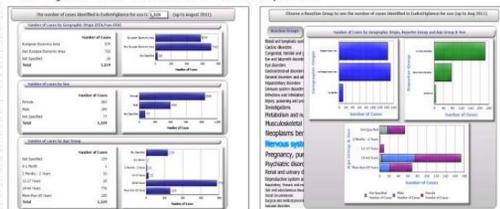
- It was launched in Dec 2001
- Electronic reporting of individual case safety reports (ICSRs) are mandatory since 2005
- Electronic exchange of suspected adverse reaction reports (Individual Case Safety Reports, ICSRs) between the Agency, NCAs, MAHs, and sponsors of clinical trials in EEA
- Early detection of possible safety signals associated with medicinal products for Human Use
- Continuous monitoring and evaluation of potential safety issues in relation to reported adverse reactions

EMA, 2017

EudraVigilance

- 15.7 million transactions during 2013
- >450,000 product presentations in EVMPD
- over 1 million adverse reaction reports received and processed in 2013
- 52% increase in patient reporting (EEA)
- In total >7 million reports (approx 4.6 million cases)
- EudraVigilance among 3 largest databases of ADRs in the world
- Signal detection, best evidence/decision making, transparency

The dashboard provide functionalities for the user to navigate within multiple panels, refining at the same time the level of information provided



WHO Programme for International Drug Monitoring

- Includes >150 countries whose aims are the safer use of medicines for patients everywhere and building a global culture of patient safety.
- They work nationally and collaborate internationally to monitor and identify the harm caused by medicines, to reduce the risks to patients and to establish worldwide pharmacovigilance standards and systems.
- The WHO Program was created in 1968.
- The Uppsala Monitoring Center is responsible for the technical and operational aspects of the program since 1978.

<https://www.who-umc.org/global-pharmacovigilance/who-programme/>

Vigibase

- WHO global database of individual case safety reports (ICSRs).
- It is the largest database of its kind in the world, with over **16 million** reports of suspected adverse effects of medicines submitted since 1968 by member countries of the WHO Programme for International Drug Monitoring.
- The vigiflow is a web-based Individual Case Safety Report (ICSR) management system

<https://www.who-umc.org/vigibase/vigibase/>

Members of the WHO Programme

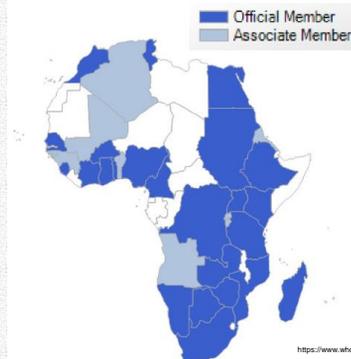


On May 2018, 131 countries are members of the WHO Programme for International Drug Monitoring, and 29 associate member countries

Dark blue: Full member Light blue: Associate member White: Non-member <https://www.who-umc.org/global-pharmacovigilance/members/members/> Accessed on May 2018

<https://www.who-umc.org/global-pharmacovigilance/members/members/>

Year 2010



<https://www.who-umc.org/media/2006/1475-2875-10-57.pdf>

Systematic Methods for the Evaluation of Spontaneous Reports

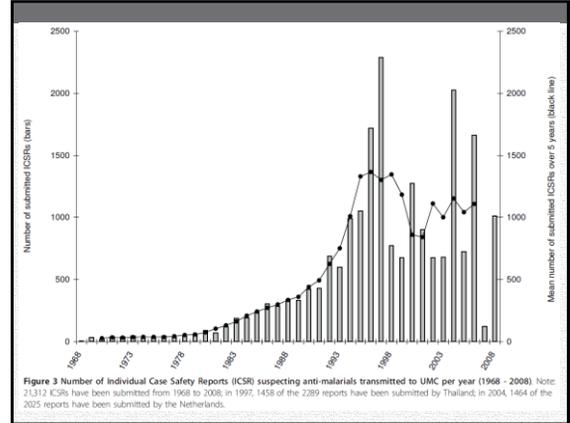
- Data Mining
 - Calculation of the proportional reporting ratio, as well as the use of Bayesian and other techniques for signal detection
 - Used to examine drug-drug interactions
 - They should always be used in conjunction with, and not in place of, analyses of single case reports.
 - Facilitate the evaluation of spontaneous reports by using statistical methods to detect potential signals for further evaluation.

Use of Data Mining

- Mathematical tool identifies higher-than-expected frequency of product-event combinations
- Tool for hypothesis generation
- Supplements FAERS data review
- Does not replace expert clinical case review

Stimulating Reporting

- Methods to encourage and facilitate reporting by health professionals in specific situations (e.g., in-hospital settings) for new products or for limited time periods
- Includes:
 - On-line reporting of adverse events
 - Systematic stimulation of reporting of adverse events based on a pre-designed method.
- Issues similar to spontaneous reports (selective reporting and incomplete information)
- Stimulated adverse event reporting in the early post-marketing phase can lead companies to notify healthcare professionals of new therapies and provide safety information early in use by the general population (e.g., Early Post-marketing Phase Vigilance, EPPV in Japan)
- Data obtained from stimulated reporting cannot be used to generate accurate incidence rates, but reporting rates can be estimated



In Conclusion....