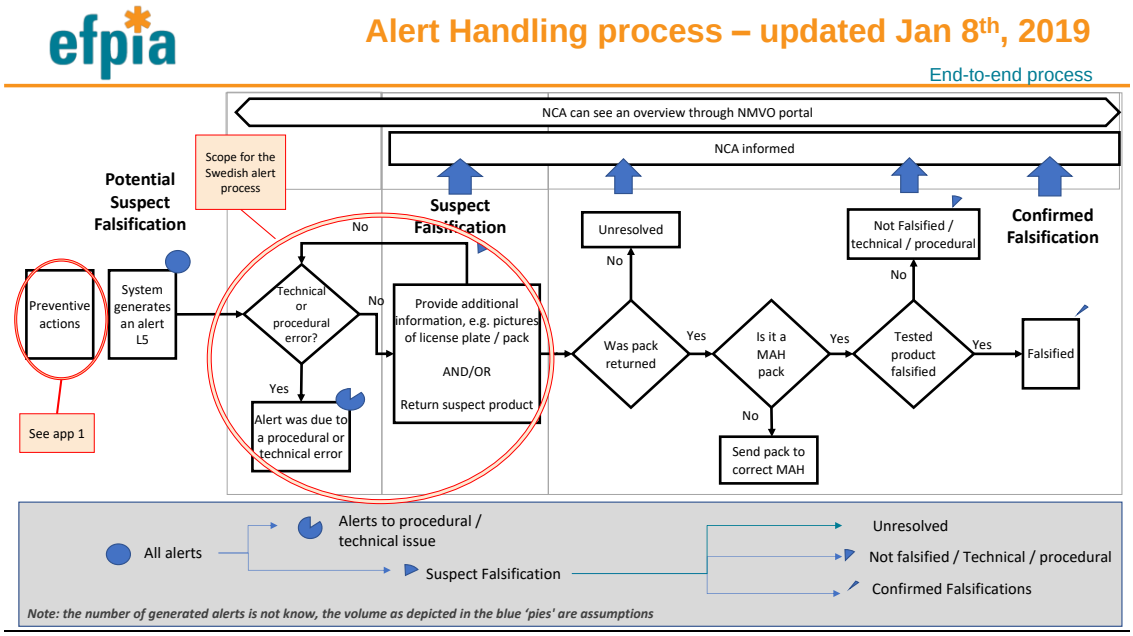
Swedish process for handling and communication of alerts from 9 February 2019 – summary in English, *draft 2019-01-14*

Background, conditions and assumptions

- The Swedish process is focused on alerts triggered in an end-user (Ph/ WH) transaction, and how we can minimise any disturbances in the supply of medicines to patients and unnecessarily block packs/batches from use. By defining the cases where a fast communication with the MAH/OBP is needed to achieve this, we aim to simplify the process for all parties as much as possible and provide clarity regarding handling of packs that can be followed by all involved parties.
- The scope of the Swedish process and this guideline is illustrated below in the overall flowchart from the "Guideline for EMVO and NMVO stakeholders: recommendations for alert handling and prevention process, January 2019", hereafter called "the European Guideline."



- Direkt communication between the parties concerned would be the most efficient way to communicate and "close" alerts. This requires either a change in the EMVS or a separate solution e.g. a Portal,which is being explored on the European level. We make the assumption that such a solution will be forthcoming and thus we accept a temporary and somewhat deficient "better than nothing" solution for 2019
- The existing channels for Complaint reporting in Sweden[1] are currently the only viable channels for quickly informing the MAH of a quality problem and send back the pack. The

[1] Web based service "reklameralakemedel.se" used by most Ph, Apoteket AB has got their own system. (1-way communication). Distributors (WS) use mailbased communication. .

same channels could be utilised for alerts (despite these packs being of a different nature). This is the least bad solution at this time

- When the same channel is used for both the Alert reports and the Complaint reports, they will be clearly distinguished in a visible way for the recipients (MAH and NCA). This change is planned in the web-based channels and will enable recipients to redirect the communication as required for complaints and alerts respectively.
- The alternative, that e-VIS, as the NMVO, would manually handle the communication, act as a" spider in the web", has been evaluated. This would prolong the lead times significantly and is not seen as a viable option.
- These guidelines are intended as the basis for each stakeholder in the supply chain for their internal routines, instructions and training.
- Preventive actions, e.g. training, verify correct uploading of serialisation data etc are essential and should be undertaken by all stakeholders. A list of suggested preventive actions can be found in the European Guideline
- The transactions triggering an alert, as well as a number of often discussed transactions that might be ambiguous, can be found in App 1.

<u>Principles for the proposed solution</u>

We are assuming that the situation will be very different when the EMVS system, as well as the processes for all connected stakeholders, are in a mature, steady-state compared to what we need to manage in the first phase of operational use of the EMVS across Europe. We don't believe the mature state will be in place during 2019

In the ***early use of the system*** in the operational phase, for a correctly handled pack where the system response is "*Pack (UI) unknown - an alert has been raised in the system*", there is a high probability this is due to incorrect or missing data upload to the Eu Hub. This assumption must be confirmed by the MAH/OBP and the correct data must be uploaded to the Eu Hub. The pack/batch can then be processed further in the supply chain, e.g. distributed to Pharmacies or supplied to a patient. The fastest way to communicate with MAH/local representative in Sweden is to use the current, web-based Complaint reporting channels. A majority of the MAH/local representatives are connected to this service. e-VIS will strive to get as many as possible of the missing companies connected. *MAH/local representatives must then set up the communication process with their OBP*.

If the correct pack data is *not* uploaded, or a commitment to conclude the investigation as soon as possible is not received from the MAH within 3 working days, the pack(s) will be deemed obsolete and returned to the MAH for investigation. If the medicine is deemed by the Pharmacy to be critical, they will contact e-VIS for further investigation and efforts to contact the MAH

A correctly handled pack where the system response is '*pack is already in the requested state – an alert has been raised in the system*' is a potential suspect falsification and will not

be handled further in the supply chain. The pack is obsolete and will be reported via the Complaints channel and returned to the MAH for investigation.

The above processes will be closely reviewed and updated as needed as experience is gained.

Process for **Ph/WS handling** of a "potential suspect falsification" from 9/2 2019

- End-user (Ph/WS) check if a technical or process error caused the Alert.
- The end-user must document the Alert ID and store with the documented investigation or with the pack if applicable (in e.g. a plastic bag)
- The Alert must be reported according to the agreed process and in the available channel(s). For 2019 these are the existing Complaints reporting channels

Process for **MAH/local representative handling** of a "potential suspect falsification" from 9/2 2019

- MAH/repr recieves an Alert report including the Alert ID from Ph/WS via the Complaint channel
- Initiate an investigation. If a potential MAH/OBP error this must be done ASAP
- Respond/provide feedback to the reporting Ph/WS as soon as possible and at the latest within 3 working days. Copy to e-VIS
- If the error affects an entire batch, communicate to the Distributor /WS for further communication to the Pharmacies* in the established channels. Copy to e-VIS
- Perform corrective action(s) and confirm to Ph/WS, copy e-VIS

* *When the local representative becomes aware there are alerts for several packs from one batch, likely coming from several Pharmacies, it was seen as important to let all Pharmacies know as soon as possible that this particular batch is being investigated so further alerts can be avoided. There is an established process for the 2 Distributors (basically handling all products) to communicate quickly to the Pharmacies and the stakeholders deemed this to be the best way to inform.*

The proposed solution defines three categories of alerts:

1. **Alerts caused by the end-user through process or handling error. Can be corrected**.
   There is nothing wrong with the pack or data in the system.

2. **Alerts that cannot be corrected**.
   The pack can never be dispensed or sold.
   In this category are packs with a high probability of being falsified. We expect few such cases.

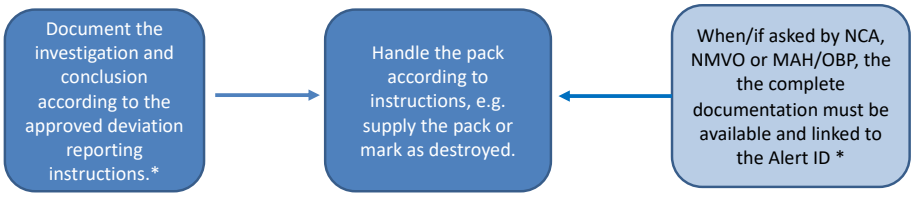
3. **Alerts caused by an OBP/MAH error/omission. Can be corrected.**
   The pack(s) can be dispensed or sold when the OBP/MAH has concluded they an error has been made and then corrected this, e.g. uploaded missing data. High risk for many alerts in this category in the first 3-6 (?) months.
   Since these could cause drug shortages, and thus a negative impact on patients, **this category must be prioritised by all stakeholders.**

Comment on the categories in relation to the Scenarios in the European Guideline

In the European Guideline, two basic scenarios for the errors causing an alert have been defined: Date errors and Pack (UI) State errors, each with a root cause referring to who caused the alert. The same basics Is also applied in the categories described above, we have however cut them differently and focused on if the error, once established, can be corrected or not. The reason is to enable the end-user to focus in those cases where a pack, after a corrective action can be supplied to a patient and only those packs needs to be held in quarantine

e-VIS categori / European Scenario	1. Alert caused by end user error	2. Alert cannot be corrected	3. Alert caused by MAH/OBP
Data error	X	N/A	X
Pack (UI) status error	X	X	N/A

1. Alerts caused by the end-user through process or handling error (e.g. ”double dispense” above the agreed limit)

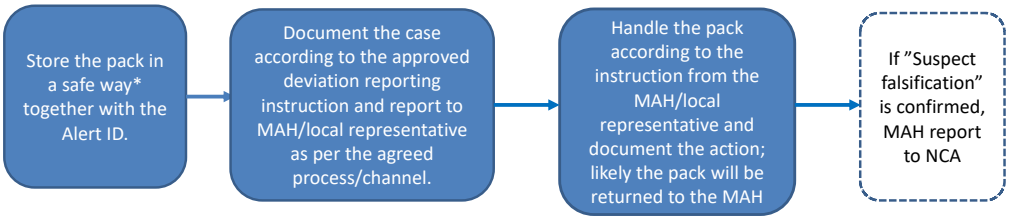


If s handling or process error is confirmed, the pack is ”clear” and can be handled according to the original intention.

For the first few months in the operational phase, we don’t expect these cases to be the main focus and we do not intend for the end-user to report these cases immediately to the MAH. We plan to have a continuous follow-up and evaluation of the alerts and the processes. Based on this, we will decide when and how these alerts will be reported to the MAH. If the alert communication is solved within the EMVS in the future, it will sort itself!

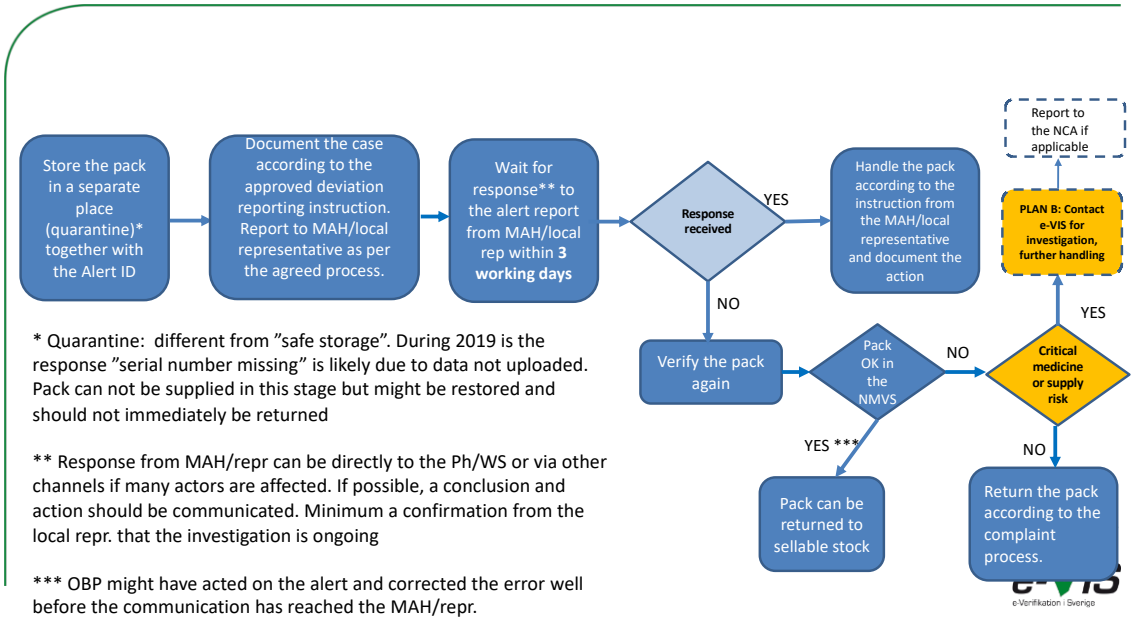
** The Alert ID must be kept also in these cases and is a crucial part of the documentation. It will be used by the NCA, NMVO and/or MAH/OBP in any communication or follow-up.*

2. Alerts that cannot be corrected (e.g. the pack status is exported or destroyed in another location)



* Safe storage: If the suspected falsification is confirmed, the pack is evidence and must be kept intact. It should be put it in a plastic bag and labelled with the Alert ID

3. **Alerts caused by an OBP/MAH error/omission. Can be corrected, e.g. Serial number not found**



<u>Conclusion and summary</u>

The process described in summary in this document has been developed with representatives for all stakeholders in Sweden and presented to the NCA. Version 1.0 of the Swedish guideline will be issued jointly by e-VIS and the Swedish Pharmacy Association in January 2019. It will be posted on e-VIS.se together with references on how to handle the reporting channels.

The guideline will be reviewed by a stakeholder group on a regular basis, and, when needed, updated based on the experience gained when the Delegated Regulation is in force and the system is widely used.

App 1

Transactions causing an alert

Case	System response.	Action
Incorrect manual entry of Snr - above accepted number of trials (10)	Serial number unknown, alert is raised	Investigate to confirm procedural error. If confirmed, document investigation. Inform acc to agreed process. Enter correct code into system and, if accepted, supply pack
Incorrect manual entry of Batch Id/Exp date - above accepted numnber of trials (10). TBC if manual entry of Ba id/exp date is ever needed.	Batch id/Exp date mismatch, alert is raised	Investigate to confirm procedural error. If confirmed, document investigation. Inform acc to agreed process. Enter correct code into system and if accepted, supply pack
Verification/decommissioning via scanning, or correct manual entry, serial number unknown	Serial number unknown, alert is raised	Put pack in plastic bag, label with Unique Pack Return Code, UPRC. Inform MAH Local repr acc to agreed process. Expect feedback woton 3 working days. Before sending package back - scan package to see if data been uploaded and no longer cause an alert. If no alert, return to sellable stock.
Verification/decommissioning via scanning, or correct manual entry, batch id mismatch	Batch id mismatch, alert is raised	
Verification/decommissioning via scanning, or correct manual entry, exiry date mismatch	Exp date mismatch, alert is raised	
Decommissioning of an already decommissioned pack (supplied, destroyed, exported, stolen, sample, free sample, locked checked-out) except Supplied in same location	The pack can not be decommissioned (Pack is already in [requested] state). An alert has been raised	Investigate to confirm procedural error. If confirmed, document investigation. Inform acc to agreed process. Handle pack according to original intention If not confirmed, put pack in plastic bag, label with Unique Pack Return Code, UPRC. Inform MAH/nat repr acc to agreed process and return pack
Supply of an already supplied pack in same location, "double dispense" (attempt over national allowed limit=2)	The pack cannot be decommissioned (Pack is already in [requested] state). An alert has been raised	Investigate to confirm procedural error. If confirmed, document investigation. Inform acc to agreed process. Supply pack If not confirmed, put pack in plastic bag, label with Unique Pack Return Code, UPRC. Inform MAH/nat repr acc to agreed process and return pack
Repeat verification of an "alerted" pack	If reason for the first alert was "Product code, Serial no or Ba Id/Exp date is unknown", a new alert is raised	If reported as agreed and no repsonse from MAH/local repr within the agreed timeframe, return pack (in plastic bag with both original and new UPRC attached)
Repeat decommisioning of an "alerted" pack	A new alert is raised	If reported as agreed and no repsonse from MAH/local repr within the agreed timeframe, return pack (in plastic bag with both original and new UPRC attached)
Reactivate checked-out pack	The pack cannot be reactivated. An alert has been raised	This situation should not occur. Report to MAH/local repr acc to agreed process and return pack.

Often discussed transactions - no alert is raised

Case	System response.	Action
2D code incorrect	Product code invalid or serial no/ba id/exp date invalid	Supply pack. Assume released prior to 9/2 2019
2D code not complete; PC, Snr or Ba/exp missing	Product code required or serial no/ba id/exp date is requires	Supply pack. Assume released prior to 9/2 2019
Product code unknown, from a product not uploaded to the SMVS, e.g. Indian pack	Product code is unknown, a warning is received	Supply pack. Assume not covered by Delegsted regulation or released prior to 9/2 2019
2D code and HR correct but no anti-tampering device = safety features not complete	Pack is active or set in requested state = all is OK from a system point of view	Supply pack. Assume released prior to 9/2 2019
Verification of an expired pack	Pack is expired, no alert	Return or destroy depending on Agreement w MAH. (Use existing routine/process)
Verification of a recalled pack	Pack is recalled, no alert	
Verification of a pack from a withdrawn product	Product is withdrawn, no alert	
Decommissioning of an expired pack	Pack is expired, no alert. Decommissioning not allowed	Return or destroy depending on Agreement w MAH. (Use existing routine/process)
Decommissioning of an recalled pack	Pack is recalled, no alert. Decommissioning not allowed	
Decommissioning of a pack from a withdrawn product	Product is withdrawn, no alert. Decommissioning not allowed	
Verification of already decommissioned pack (supplied, destroyed, exported, stolen, sample, free sample, locked checked-out, recalled, expired, withdrawn)	Pack is already in the [requested] state. No alert	Verification of a pack might be made to doublecheck status of a pack that is supposed to be e.g. destroyed - this should not cause any further action. If the pack is supposed to be active, special investigation is needed.
Reactive exported pack in same location within 10 days. (NB is in another location or outside time limit, pack cannot be reactivated)	Pack is reactivated, No alert	Handle pack as planned
Reactive locked pack in same location. (NB in another location, pack cannot be reactivated)	Pack is reactivated, No alert	Handle pack as planned
Repeat verification of an "alerted" pack (due to pack in requested state)	System informs about current state of the pack, no new alert	Maintain pack as after the original alert
Reactivate exported or locked pack outside time limit or in other location	Ths pack cannot be reactivated. No alert is raised	
Reactivate pack marked as destroyed, stolen, sample, free sample	Ths pack cannot be reactivated. No alert is raised	
Reactivate supplied pack	Ths pack cannot be reactivated. No alert is raised	