#### **REPUBLIC OF RWANDA**



MINISTRY OF HEALTH

# Guidelines for Pharmacovigilance and Medicine Information System in Rwanda

February 2011

#### Purpose

The purpose of these guidelines is to help health workers to participate in the process of continuous surveillance of safety and efficacy of the pharmaceutical products which are used in clinical practice, thus help to achieve the ultimate goal to make safer and more effective treatment available to patients.

This guideline addresses specifically the issues on what to report, why to report, when to report, where to report and how to report.

# **Enquiries and feedback**

The National Pharmacovigilance and Medicine Information Center (NPMIC), in consultation with various stakeholders, will review this guideline and tools periodically, to ensure that they continue to meet the goals of the pharmacovigilance system.

All enquiries and feedback regarding the suitability and practicability of the various tools in the guidelines should be addressed to:

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# ACRONYMS AND ABBREVIATIONS

ADR	adverse drug reaction
AIDS	acquired immunodeficiency syndrome
DTC	Drug and Therapeutics Committee
GoR	Government of Rwanda
HIV	human immunodeficiency syndrome
MAH	Marketing authorization holder
MoH	Ministry of Health
MSC	Medicine Safety Committee
MSH	Management Sciences for Health
NMC	National Medicines Committee
NMRA	National Medicine Regulatory Authority
NPMIC	National Pharmacovigilance and Medicine Information Center
PHP	public health program
RFMA	Rwanda Food and Medicines Authority
SOP	standard operating procedure
SPS	Strengthening Pharmaceutical Systems [Program]
ТВ	tuberculosis
TRAC	Treatment and Research AIDS Center
UMC	The Uppsala Monitoring Centre
WHO	WHO

#### FOREWORD

On June 26, 2010, the Rwanda Cabinet approved the Food and Drug Act developed by the Ministry of Health which identifies the Rwanda Food and Medicines Authority (RFMA) as the regulatory board of all medicine- and food-related issues. This document is now in the approval process by the Rwanda Parliament. One of the RFMA's core mandates is to ensure that the medicines used in the country are of good quality, safe, and efficacious.

As the RFMA is not yet established, the Ministry of Health has established a Pharmacy Task Force which performs most activities related to pharmaceuticals regulations, among them pharmacovigilance and medicine information.

Medicines despite their obvious benefits can also cause adverse drug reactions (ADR) which can be serious or even fatal. Most often these ADRs are preventable. Because of our nascent pharmacovigilance system, it is true that the actual financial burden on our health care system from unreported and undetected ADRs remains unknown but could be huge if the estimates from the countries with developed systems are anything to go by.

The National Pharmacovigilance and Medicine Information Center in the Ministry of Health has been actively involved in designing tools and guidelines for detection and reporting of adverse events.

In 2008, development of the *Guideline for Pharmacovigilance and Medicine Information System in Rwanda* began and the final guidelines were adopted by the General Senior Management Meeting of Ministry of Health in February 2011. This development was followed by sensitization of 27 central health care workers who took part in a training of trainers at Kigali. These trainers then lead a training of trainers at national level for 177 trainers from district hospital, who in turn trained 2,400 health care providers from district hospitals. Several other tools were also developed concurrently, including the form for reporting poor quality medicinal products, suspected adverse event reporting form, and ADR Alert Card, which have already been printed.

These guidelines for the National Pharmacovigilance System in Rwanda has been developed to complement and support the efforts of educating all health care workers on this important concept and enhance our efforts in ensuring that safe, efficacious and quality medicines are made available to all Rwandans.

Dr. Agnes Binagwaho

Minister of Health Kigali, March 2011

#### INTRODUCTION

The need for monitoring medicines safety is globally recognized. Pre-marketing clinical trials for the evaluation of quality, efficacy, and safety of new medicines provide the first opportunity for generating data on the safety of a new medicine. However, pre-market clinical trials have many limitations, including the relatively few number of patients exposed and lack of complete understanding of long-term effects, co-morbid conditions, and use in the elderly, children, and pregnant women, and among different racial groups. This means that when a new medicine is released to the public, comprehensive understanding of its safety profile is incomplete.

Additionally, there have been increased efforts recently to expand access and introduce new pharmaceutical products in developing countries. The Government of Rwanda (GoR) has ensured access to these new pharmaceutical products for the management of HIV/AIDS, tuberculosis (TB), and malaria. There is now a great need to compliment the efforts at expanding access with adequate attention to rational use and safety monitoring. Monitoring safety during real-life use can provide valuable safety information to compliment safety data generated during pre-marketing clinical trials.

The need for safety monitoring may be particularly important in resource-constrained countries. Adverse drug reactions (ADR) rank among the top 10 leading causes of mortality in several developed countries;<sup>1</sup> the overall incidence of serious ADRs from 1966 to 1996 was 6.7 percent in the United States and the United Kingdom.<sup>2</sup> The burden of ADRs in Rwanda is unknown; however, it is projected that the burden may even be higher due to several factors including—

- High prevalence of HIV/AIDS, TB, malaria and other co-morbid conditions
- Insufficient knowledge of the quality of pharmaceutical products
- Widespread use of traditional and complimentary medicines
- Different genetic and nutritional status of Rwandese compared to those individuals who participated in the clinical trials
- Lack of capacity to monitor for early signs of toxicity

Pharmacovigilance and medicine information systems are therefore required in Rwanda. Pharmacovigilance can provide useful information when characterizing and quantifying previously recognized ADRs, determining actual effectiveness, identifying, and preventing new drug-induced diseases early on, and reducing mortality and morbidity.

Traditional medicine use is increasing in the Western world (where it is not well regulated) and is widespread in African countries. Several herbal medicines are used frequently, and may be associated with adverse effects. Continuing vigilance is needed.<sup>3</sup>

<sup>&</sup>lt;sup>1</sup> Safety of Medicine -A guide to detecting and reporting adverse drug reaction- why health professionals need to take action. http://apps.who.int/medicinedocs/en/d/Jh2992e/

<sup>&</sup>lt;sup>2</sup> Lazarou, J, B. H. Pomeranz, and P.N. Corey. 1998. Incidence of adverse drug reactions in hospitalized patients: a meta-analysis of prospective studies. *Journal of the American Medical Association* 279:1200-5.

<sup>&</sup>lt;sup>3</sup> The Uppsala Monitoring Centre (the UMC), WHO Collaborating Centre for International Drug Monitoring. 2000.

The Rwanda Ministry of Health (MoH) is committed to improving medicine safety monitoring and protecting the public health. Guidelines and regulations are in place to ensure that the safety and effectiveness of medicines available in Rwanda are monitored. It is the vision of the MoH that all such related activities should be standardized and coordinated. This *Guideline for Pharmacovigilance and Medicine Information System in Rwanda* provides standard operating procedures (SOPs) and directions for addressing all issues related to medicines and patient safety in a comprehensive manner. Users are encouraged to refer to regularly to these guidelines for consistent understanding of medicine safety surveillance activities in Rwanda.

# Establishment of the National Pharmacovigilance and Medicines Information Center

To address the need for systems for routine medicine safety surveillance and to ensure the protection of public health, the Rwanda MoH has established the National Pharmacovigilance and Medicine Information Center (NPMIC). The NPMIC is based within the National Medicine Regulatory Authority (NMRA) in the MoH. The NPMIC will fulfill its medicine safety role by liaising with numerous MoH units, departments, and committees.

#### **Overarching Goal of the NPMIC**

NPMIC's goal is to develop and implement pharmacovigilance and medicine information systems that will provide unbiased information, monitor safety and effectiveness, and improve rational use of pharmaceutical products in Rwanda.

#### Scope of Pharmacovigilance and Medicine Information System in Rwanda

The scope of activities grouped under pharmacovigilance and medicine information undertaken by NPMIC in Rwanda includes the following—

- Monitor safety, effectiveness, and tolerability of medicines used in Rwanda
- Quantify and characterize occurrence of previously recognized ADRs in Rwanda
- Conduct and coordinate spontaneous reporting and active surveillance activities
- Provide unbiased medicine information to health workers and consumers
- Monitor the promotion and advertising of all health products
- Improve rational medicines use
- Contribute to patient safety improvement
- Develop interventions to reduce pharmaceutical product-induced morbidity and mortality

World Health Organization. 2000. Safety Monitoring Of Medicinal Products. Guidelines for Setting Up and Running a Pharmacovigilance Centre. [in French]. Geneva: WHO.

In addition, there are several MoH committees which are responsible for ensuring participation in medicine safety surveillance activities, such as the selection of medicines for inclusion in the standard treatment guidelines or the essential medicine lists. Information on safety, comparative effectiveness, and rational medicines use greatly influence medicine selection activities like the development of standard treatment guidelines, the clinical practice guidelines, and the national essential medicine list. The NPMIC is a national resource in providing evidence-based information to influence medicine selection and related activities of technical committees in Rwanda working in these areas.

#### Importance of Pharmacovigilance

The World Health Organization (WHO) defines pharmacovigilance as the science and activities relating to the detection, assessment, understanding, and prevention of adverse effects or any other medicine-related problem. Recently, its concerns have been widened to include<sup>4</sup>—

- Herbal medicines
- Traditional and complementary medicines
- Blood products
- Biologicals
- Medical devices
- Vaccines

The information collected during the pre-marketing phase of drug development is inevitably incomplete with regards to possible ADRs. This is mainly because—

- Tests in animals are insufficiently predictive of human safety
- In clinical trials, patients are selected and limited in number, the conditions of use often differ from those in clinical practice, and the duration of trials is limited
- Information about rare but serious adverse reactions, chronic toxicity, use in specials groups (such as children, the elderly, or pregnant women), or drug interactions is often incomplete or not available

For all medicines, there is a tradeoff between the benefits and the potential for harm. To minimize the harm, it is necessary that medicines of good quality, safety and efficacy are used rationally and that the expectations and concerns of the patient are taken into account when therapeutic decisions are made.

#### Importance of Unbiased Medicine Information

The provision of easily accessible and reliable unbiased information on medicines is an essential element in achieving national health goals in Rwanda. Medicine information service is

committed to provide information to health care professionals, patients, and/or consumers<sup>4</sup> And will be useful in the following situations—

- Improving care and treatment outcomes
- Ensuring that only evidence-based, consistent, and locally peer-reviewed information are provided to health workers and consumers
- Providing health workers and consumers information on safety of medicines obtained from credible sources
- Educating health workers and consumers through trainings, written materials, and other media activities
- Monitoring medicine promotion and advertising activities to identify and address spurious claims and misinformation
- Conducting comparative effectiveness reviews
- Providing pharmaceutical-related information to other MoH technical committees involved in pharmaceutical products

<sup>&</sup>lt;sup>4</sup> U.S. Pharmacopeia. USP DQI Drug Information Program. (program title change, now known as "Promoting the Quality of Medicines"). Available at <u>http://www.usp.org/worldwide/PQMResourceLibrary.html</u>

#### ADVERSE EVENT NOTIFICATION SYSTEM FOR PHARMACOVIGILANCE SYSTEM

An adverse event is any untoward medical occurrence that may present during treatment with a pharmaceutical product but which does not necessarily have a causal relationship with the treatment. An adverse drug reaction (ADR) is a response to a medicine which is noxious and unintended, and occurs at a dose normally used in humans for prophylaxis, diagnosis, or therapy of disease; or for the modification of physiological function. This means that any ADR is included in adverse event.

In Rwanda, the notification system will focus on detection of adverse events and the NPMIC and pharmacovigilance subcommittee will conduct causality assessment in order to ensure that this event was really an ADR.

#### **Notification System**

NPMIC activities rely heavily in regular interactions with health workers and the patient/consumer. Figure 1 shows the ADR notification system developed to guide the flow of information for all the activities under the scope of pharmacovigilance system. Pharmacovigilance concern or the request for medicine information originates with the patient or consumer. The patient/consumer is at the very foundation of the Rwanda notification system. The patient/consumer can report adverse events and/or requests for medicine information through health centers, private sector clinics and pharmacies, and through hospitals. All adverse events communicated by the patient/consumer will be reported through an adverse event notification form filled in by health care providers and collected by the individual hospital pharmacovigilance activities). The NPMIC has collaborative responsibilities with several bodies including the public health programs and the technical committees (for example, the standard treatment guidelines committees and the pharmaceutical products list committee). The NPMIC reports to the NMRA which is accountable to the MoH.



Figure 1. Notification system for medicine safety surveillance

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# Roles and Responsibilities in Relation to Pharmacovigilance and Medicine Information

It is important that all stakeholders, consumer organizations, civil societies, and the public have roles in monitoring safety and rational medicines use in Rwanda. The public are therefore encouraged to participate in pharmacovigilance activities through the channels of the notification system. The roles and responsibilities of all bodies listed in the adverse event notification system are listed below.

#### Patient/Consumer

Patients/consumers have the following roles in medicine safety surveillance in Rwanda-

- If a patient/consumer, family member, or someone the client knows experiences a adverse event occurring during/after any medication or medical intervention, the event should be reported to a health care provider
- Request information from the health care providers within the health facilities or directly from the NPMIC concerning any medicine
- Report any suspicion of poor quality medicine to the community health workers, health centers, hospitals, private clinics, and pharmacies, or directly to the NPMIC

#### Health Care Providers including Community Health Workers

The health care providers shall provide the best quality care to patients. One of the responsibilities of health care providers is to encourage patients to ask questions about their health condition and to report adverse events. When patients report adverse events, health care providers have to manage and report those adverse events.

Reporting these adverse events will provide valuable national data to be used by technical committees and orient the regulatory decisions. Health care providers have the following roles and responsibilities—

- 1. Provide advice to the patients on the need to adhere to the treatment plan and to report any adverse event
- 2. Detect and manage adverse events and all health products-induced disorders
- 3. Report all adverse events to the NPMIC through pharmacovigilance subcommittees
- 4. Participate in pharmacovigilance activities in collaboration with the subcommittees

<u>Note</u>: In cases of health products adverse events communicated to community health workers, the workers have the responsibility to refer the patient to the health centre and report the event, if requested.

#### **PV Subcommittees**

Among the Drug and Therapeutics Committee (DTC) members, a subcommittee shall be appointed to serve on the pharmacovigilance subcommittee. This DTC subcommittee shall implement the policies, guidelines, and standards of the NPMIC. It has the following responsibilities—

- Implement the *Guidelines for Pharmacovigilance and Medicine Information System* in health facilities within its catchment area.
- Ensure the availability of the adverse event notification forms and patient alert cards in health facilities
- Collect, validate, and transmit all notifications to NPMIC
- Ensure that health care providers are trained and familiar with the completion of the notification forms and patient alert cards
- Sensitize health care providers on pharmacovigilance activities
- Collaborate regularly with the NPMIC on pharmacovigilance and medicine information related issues
- Identify and suggest interventions to address any medicine safety and/or irrational use issues in health facilities within their catchment area

#### Public Health Programs

The public health programs (PHPs) are sometimes requested to use new essential medicines. In addition, PHPs which include mass treatment programs, do not have qualified health care providers at community level. In this regards, public health programs are expected to be sensitive to medicine safety issues. The PHPs, therefore, have the following responsibilities—

- Collaborate with NPMIC to identify priority safety issues related to medicines used in their programs
- Collaborate with NPMIC to identify, plan, and conduct active surveillance studies to provide more information on safety issues related to medicines used in the program
- Organize formal reporting of adverse events in mass treatment campaigns
- Help increase awareness on the need to report adverse events for their particular products and their transmission to the NPMIC

- In collaboration with NPMIC, work with the Rwanda National Ethics Committee or related bodies to ensure proper review of study protocols
- Provide findings on all medicine safety-related studies to the NPMIC
- Provide regular feedback to NPMIC on selected medicines safety indicators
- Collaborate with NPMIC to provide regular trainings on pharmacovigilance for health care providers in the PHPs
- Collaborate with NPMIC in using the standard operating procedures (SOPs) and initiating active surveillance of the medicine they managed

#### NPMIC

To fulfill the goal of developing and implementing pharmacovigilance and medicine information system, the NPMIC has the following roles and responsibilities—

- Provide technical advice to the MoH authorities in all policy decisions related to medicine safety in Rwanda
- Provide technical advice to National Medicines Committee (NMC), NMRA, and other related bodies for decision making
- Develop standards and procedures for pharmacovigilance and medicine information activities in Rwanda
- Identify pharmacovigilance and medicine information priorities and lead all efforts in addressing them
- Develop, implement, and update tools for all pharmacovigilance and medicine information activities
- Supervise all relevant pharmacovigilance studies
- Coordinate in-service pharmacovigilance educational activities for health care providers and consumers
- Coordinate and provide technical support to PV subcommittees
- Collaborate with the academic institutions and other stakeholders in providing pre-service trainings in pharmacovigilance
- Provide medicine information to health care providers, patients/consumers, and the entire public through telephone, internet, media, and publications

- Conduct causality assessment of adverse events notifications received
- Serve as the secretariat of the Medicines Safety Committee (MSC)
- Collaborate and participate in regional and international activities related to

pharmacovigilance and medicine information, such as active surveillance of people living with HIV under antiretroviral therapy in the Great Lakes region

- Collaborate with the WHO/Uppsala Monitoring Centre (*the* UMC), and others stakeholders involved in pharmacovigilance and medicine information to exchange information and data with other pharmacovigilance centers
- Establish formal ways of collaboration with all stakeholders in all issues related to pharmacovigilance and medicine information

#### The NMRA

The NMRA oversees the functioning of the NPMIC and has the following responsibilities-

- Supervise the implementation of the national *Guidelines for Pharmacovigilance and Medicine Information System*
- Identify knowledge and gaps in pharmacovigilance and collaborate with NPMIC to address them
- Propose to MoH the decisions to be taken to improve medicine safety surveillance and information.

#### MSC

The MSC serves as an expert advisory committee and is constituted of multidisciplinary specialized persons appointed by the competent MoH authority according to his or her terms of reference.

The MSC has the following responsibilities:----

- Provide technical advice to NPMIC and the NMRA
- Conduct causality assessment on adverse events reports when requested by the NPMIC
- Supervise all post authorization surveillance studies conducted in Rwanda
- Collaborate with the Rwanda National Ethics Committee to approve study protocols

NMC

The NMC proposes decisions on medicines-related issues to the NMRA prior to their approval by MoH authorities. The NMC members shall be appointed by the competent in the MoH Health authority according to his or her terms of reference.

The NMC has the following responsibilities—

- Provide recommendations to the NMRA on decisions and priority interventions to be approved by MoH authority
- Coordinate different medicines safety subcommittees

#### Other Stakeholders

#### Marketing Authorization Holder

Marketing authorization holder s(MAHs) in Rwanda include the holder of the registration certificate, the local representative of the manufacturer (distributor or wholesaler), the importer of the product, and all other persons who obtained permission from the NMRA to manufacture, import, and market pharmaceuticals in Rwanda. Each MAH has the following responsibilities towards medicine safety surveillance in Rwanda—

- Mandatory reporting of all adverse events associated with the product the holder is authorized to distribute, including those events that are not detected in Rwanda. MAHs are responsible to report all such adverse event reports that they are informed of to the NPMIC. Serious adverse events should be reported within 48 hours of the receipt of such reports, while nonserious events should be reported within 15 days of the receipt of the report. The MAH can use the NPMIC notification form for the purposes of this report.
- The MAH is expected to provide all medicine safety relevant information related to his or her authorized product to the NPMIC once every three months.
- The MAH who intends to promote and advertise products or provide sponsorships should adhere to the regulation in place.
- MAHs should collaborate with the NPMIC toward conducting post-authorization safety studies as identified by relevant authorities in Rwanda.

There are many stakeholders that will need to be involved in the national pharmacovigilance and medicine information system at different levels, such as qualified health professionals, researchers and academics institutions, media writers, procurement agencies, standardization institutions, funding and technical assistance partners, and international and regional health organizations.

#### UMC/WHO

The UMC's responsibilities in regards to the national pharmacovigilance centers, including the NPMIC, are globally the same.

- Receive and store reports from national pharmacovigilance centers
- Provide tools, trainings, and access to information systems to enable national pharmacovigilance centers to search the global WHO database
- Monitor signals from the global WHO database (A signal refers to "reported information on a possible causal relationship between an adverse event and a drug, the relationship being unknown or incompletely documented previously.")
- Communicate signal analyses to national pharmacovigilance centers and clinical review of the analyses by experts
- Provide technical assistance to national pharmacovigilance centers
- Facilitate communication between countries
- Develop and maintain WHO Adverse Reaction Terminology and the use of the Medical Dictionary for Regulatory Activities within the WHO International Drug Monitoring Program
- Train national pharmacovigilance centers' staff
- Standardize procedures relating to pharmacovigilance activities
- Publish relevant documents
- Provide data as appropriate to other parties

#### MEDICINE INFORMATION

#### Literature Scan for Relevant Safety Alerts

The NPMIC shall provide unbiased and evidence-based medicines information to health care professionals, consumers, and the public. Appropriate medical literature will be routinely scanned for relevant safety alerts which will then be communicated to stakeholders.

#### **Requesting Medicine Information**

Health care professionals, consumers and the public should request medicine information from the NPMIC. Medicine information provided by the NPMIC should be independent and evidence-based.

The NPMIC should establish a quality assurance system to ensure that quality medicine information is provided.

#### Information, Education, Communication Materials, and NPMIC Publications

The NPMIC shall routinely produce relevant information, education, communication materials to meet its objective towards providing quality, relevant, and evidence-based medicine information. The NPMIC shall maintain a regularly publication of medicine information and medicine safety bulletin or newsletter.

#### **Medicine Promotion and Advertising**

All medicine promotion and advertising activities shall be conducted with a primary aim of promoting public health and according to the regulations in place. The NPMIC shall notify the competent authority of any medicine promotion and advertising activities that can negatively impact on patient and medicines safety.

The national guidelines for promotion and advertising of pharmaceutical products shall be adapted by the NMRA based on WHO ethical criteria.

#### PHARMACOVIGILANCE METHODS

The classic pharmacovigilance system relies on<sup>5</sup>—

- Passive surveillance: This applies to the entire population and monitors any adverse events that occur in any patient. Among its weaknesses, there are lack of solid comparisons (target and subject of the surveillance) and the inaccuracy of reporting in addition to the low rate of events occurring. It generates signal/alert that active surveillance could use for further investigations.
- Active surveillance: This method uses the pharmacoepidemiological methods to overcome the limitations of the passive pharmacovigilance. Based on the signal/alert generated by passive surveillance, it helps to identify the subject of surveillance and applies an appropriate methodology that will allow the causality assessment of adverse event. Its main weakness is its high cost in addition to its limited number of subjects.
- MAH surveillance: Once a product is authorized to be on the market, the MAHs are requested to continue to closely monitor their product's safety to contribute post marketing surveillance. This surveillance combines both passive and active surveillances and it is initiated by the MAHs without any direct participation of the NPMIC.

Passive surveillance is the principal method adapted to limited resources settings like Rwanda. As spontaneous reporting is known as the basic mechanism of this surveillance, it will be the main method to be used in generating signals/alerts of adverse events for further investigations.

#### **Spontaneous Reporting**

Spontaneous reporting involves the submission of unsolicited adverse events reports to NPMIC. This is useful for identifying safety signals of rare adverse reactions and generating hypotheses. It provides critical information that is in identifying patients who are at risk of an adverse effect to a medicine. It also can give more information on real-life experience with a medicine beyond data obtained from clinical trials.

Spontaneous reports are usually submitted in a standardized notification forms that includes four key fields—identifiable patient, adverse event, suspected product, and details on the health care professional who produces the adverse event report. Other details, however, must also be reported to help the causality assessment like allergies to medications.

Spontaneous reports can be used for to the reporting of all known and undocumented (unknown) adverse events, serious or not. These events could be the consequences of medication errors, drug interactions, therapeutic ineffectiveness, product quality problems, and problems with

<sup>&</sup>lt;sup>5</sup> WHO. 2002. Safety of Medicines. A guide to detecting and reporting adverse drug reaction; why health professionals need to take action. Geneva: WHO. http://whqlibdoc.who.int/hq/2002/WHO\_EDM\_QSM\_2002.2.pdf

medical devices even if there is no obvious relationship between the event and the suspected product. It is important to send spontaneous reports to the NPMIC promptly.

#### Spontaneous Reporting in Product Quality Monitoring

Spontaneous reporting is a routine and cost-effective way of monitoring product quality problems at the national level. A notification form has been developed to allow institutions and health care professionals to alert the Regulatory Authority of problems encountered with the medicines supplied to or used by them. This important information help the safety monitoring of medicines and, in addition to notifying NPMIC, the information goes to other departments in the regulatory authority such as the registration department, inspection department, and the quality control (laboratory analysis) department. The form has been designed to incorporate the most common pharmaceutical problems encountered.

In Rwanda, even though the submission of spontaneous reporting shall be voluntarily done by health care professionals, they are encouraged to report all adverse events brought to their attention. Moreover, it is mandatory to report any serious adverse event which caused—

- Death
- Life threatening conditions
- Disability
- Congenital anomaly
- Hospitalization
- Modification of therapy due to toxicity

The submission of spontaneous reports of suspected adverse events should be guided by the following—

- In-time reporting
  - Report any suspected adverse drug reaction as soon as it occurs
- Accuracy and completeness
  - Each notification form must accurately and legibly be filled out with all the necessary information that is available. This is very important during causality assessment. The minimum information that is required includes—
    - Patient identification
    - Detailed adverse event
    - Details on suspected pharmaceutical product,
    - Identification of the person who is has completed the adverse events notification form

In some emergency cases, reporters can also directly contact the NPMIC to inform them about any adverse event occurred to their premises. The NPMIC will then complete a notification form on their behalf. Reporters are encouraged to have complete information ready at the time they are contacted by NPMIC for more details.

- Notification forms—Two notification forms have been developed to capture reporting related to adverse event and poor quality medicines.
  - The notification form for the reporting of all adverse events in patients exposed to a medicine or device in Rwanda is attached to these guidelines (annex A [French]; annex B [English]) and will be available at health facility level. Electronic forms can also be obtained from the MoH website (http://www.moh.gov.rw).
  - The notification form for the reporting all poor quality problems in health facilities or at patient level in Rwanda is attached to these guidelines (annex C [French]; annex D [English]) and will be available to health facilities level. Electronic forms can also be obtained from the MoH website (<u>http://www.moh.gov.rw</u>).
- Emergency cases and lack of forms
  - As mentioned above, in some emergencies, reporters can also directly contact the NPMIC to inform them about any adverse event that occurred on their premises.

# Who Should Report?

- All health professionals
- Community health workers
- Patients, patients' relatives

The Rwanda notification system also allows traditional medicine practitioners and the public at large to report all adverse events related to the use of any health product to the NPMIC through pharmacovigilance subcommittees. Such health products may include complementary and alternative medicine and nutritional and dietary supplements.

# Where to Report?

- To health care providers in health facilities
- To pharmacovigilance subcommittee of drug and therapeutics committee in hospital
- To the NPMIC

# How to Report Adverse Events

- A patient who has experienced the adverse effect should report to the nearest health care providers.
- The health care providers should fill the notification form and put it in the pharmacovigilance box at their health facilities within the defined time
- At health center level, the head of health center is responsible for collecting the completed adverse effect notification forms in the box and sending them to the hospital management which will forward them to the pharmacovigilance subcommittee

- At the hospital level, the pharmacovigilance subcommittee should appoint one member whose responsibility is to collect all filled notification form from boxes within the hospital.
- The pharmacovigilance subcommittee should validate the collected forms before sending them to the NPMIC within defined period of time
- Once the notification form is submitted and received, there shall be a receipt notification from the receiver.

#### How to Report Poor Quality Medicine Problems

- Any patients, health care professionals, or anyone else who notices/suspects poor medicine quality should report it to the nearest health care providers by—
  - Filling the notification form

or

- Reporting the poor quality to a health care provider by any other mean than notification
- The health care providers who made the notification or receive it should put it in the PV box at their health facilities within the defined time
- At health center level, the head of health center is responsible of collecting the filled poor quality medicine notification form in the PV box and sending it to the hospital management which will orient them to the PV subcommittee
- At the hospital level, the PV subcommittee should appoint one member who is responsible to collect all filled notification form from PV boxes within the hospital.
- The PV subcommittee should validate the collected forms before sending them to the NPMIC within defined period of time

#### What Should Be Reported?

- Report all suspected adverse events to medicines, traditional/herbal medicines, X-ray contrast media, medical devices, cosmetics, nutritional and dietary supplements, and other health products which are not mentioned here.
- In addition to the ADR, report medicine quality problems noticed at patient level such as—
  - Color change
  - o Separation of components
  - Powdering/crumbling
  - o Caking
  - Molding
  - Change in smell
  - Poor packaging
  - Poor labeling and mislabeling
  - Suspected contamination

- Questionable stability
- Defective components
- Expired medicines

#### When to Report?

- Serious adverse events should be reported immediately to the NPMIC or its decentralized unit as they occur or as the reporter learnt about them. When those reports are sent to the PV subcommittees, those units are requested to transmit them to the NPMIC without any delay.
- The notification form for serious adverse events must be filled within 24 hours and sent to the NPMIC within 48 hours from the time of notification.
- Serious adverse events must be reported to the head of clinical services before being sent to the NPMIC
- Other adverse events reports should be received at NPMIC no later than one month after they have been reported to the health facility.
- Poor medicine quality should be reported as soon as possible, it follow the same scheme as the other adverse events.

#### What Happens to a Report?

- The submitted report will be validated and entered into the national database of adverse events. This database enables the NPMIC to keep track of all adverse event reports received nationwide.
  - For adverse event, the reports are routinely analyzed using WHO method as they are received and documented in a standard format for the determination of causality by the NPMIC.
  - For poor medicine quality, the reports are analyzed by a team composed by representatives of the Medicine Inspection Desk, Medicine Registration Desk, NPMIC staff, Rwanda Bureau of Standard, and laboratory of medicine analysis.
- The information obtained from these analyses will be submitted to the NMRA to enable the MoH for decision making. NPMIC will disseminate conclusions from analysis report and related decisions through existing communication channels.
- The NPMIC will regularly send—
  - Analyzed adverse event notifications to the UMC
  - Analyzed notification of poor medicine quality to inspection, registration, and lab analysis department for further actions

- A well-completed and duly submitted adverse events and poor medicine quality notification form by a health professional may result in—
  - Additional investigations into the use of the medicine in Rwanda
  - Appropriate changes in the package insert
  - Changes in the ways of using the pharmaceutical product
  - Enhancing educational initiatives to improve the safe use of that medicine
  - Other regulatory and health promotion interventions as the situation may warrant including product withdrawal/recall

#### How Do the Health Care Provider and Patient Benefit from Reporting?

The health care provider and patient benefit from reporting through-

- Improved quality of care offered to patients
- Reduced medicine-related problems leading to better treatment outcome
- Improved patient confidence in professional practice, hence professional growth
- Improved knowledge
- Access to feedback information on medicine-related problems reported within the country and internationally
- Satisfaction in fulfilling a moral and professional obligation

#### Use of Spontaneous Reporting in Medication Error and Patient Safety Monitoring

The notification form in Rwanda contains fields for the documentation of medication errors occurred simultaneously with an adverse event. The NPMIC shall monitor medication errors and assess their root causes to contribute in improving patient care. The NPMIC will use an updated version of the US National Coordinating Council for Medication Error Reporting and Prevention index for categorizing medication errors.

#### Protection of the Health Care Professionals Who Report Adverse Events

- Reporting an adverse event does not necessarily mean that the health care professional or the drug has contributed to or caused it.
- The outcome of the notified adverse event will be communicated to the health care provider who reported the case.
- The information given in the notification form is strictly confidential up to the central database level.
- The information obtained from reports will not be used for commercial purposes, but is intended to improve the understanding of using pharmaceutical products.

#### Active Surveillance

The spontaneous reporting system remains the backbone of medicine safety monitoring in Rwanda. Active surveillance methods can be used in further validating spontaneous report signals generated through the NPMIC spontaneous notification system. However, because of the known limitations of spontaneous reporting including the lack of denominator data, lack of controls, poor case documentation, and the inability to ascertain the report's validity, the NPMIC should promote conducting relevant active surveillance studies in Rwanda. The overall responsibility for the monitoring of active surveillance studies and other pharmacoepidemiology studies remain the prerogative of NPMIC.

#### General Guidelines for Conducting Pharmacoepidemiological Studies

In general, local and international experts and organizations interested in conducting pharmacoepidemiology studies in Rwanda will require formal technical approval from the NPMIC in addition to the Rwanda National Ethics Committee and the NMRA approval for the study to take place. Researchers are also advised to review and, as much as possible, comply with the guidelines for good pharmacoepidemiology practices<sup>1</sup> and related WHO publications.<sup>1,1</sup> This guideline recommends the following when conducting these studies—

- All pharmacoepidemiology study proposals should be submitted to the NMRA which will then set research priorities and ensure that the following issues are clearly identified—
  - Study objectives
  - o Active surveillance method
  - Capacity to implement method
  - NPMIC Involvement
- There should be a detailed protocol developed for the study.

#### Some Active Surveillance Methods to be Used in Rwanda

To implement plans for routine active surveillance activities, the NMRA will ensure that SOPs are in place for conducting active surveillance studies. After identifying research priorities, the authority will provide technical guidance on the preferred active surveillance method to be used.. The following active surveillance methods can be used—

- Cohort event monitoring
- Case control studies
- Prescription event monitoring
- Medicine/device exposure registries
- Medicine utilization studies

The PHPs can identify their research priorities based on prevalence, frequency, and importance of ADR spontaneous reports related to their specific products. They should therefore regularly collaborate with the NPMIC and identify important signals that may require validation using active surveillance methods.

<sup>1</sup> International Society for Pharmacoepidemiology. 2008. Guidelines for Good Pharmacoepidemiology Practices, GPP. *Pharmacoepidemiology and Drug Safety* 17: 200–208.

<sup>1</sup> WHO. 2006. *The safety of medicines in public health programmes: pharmacovigilance an essential tool.* Geneva: WHO. <u>http://www.who.int/medicines/areas/quality\_safety/safety\_efficacy/Pharmacovigilance\_B.pdf</u>.

<sup>1</sup> WHO. 2007. *Pharmacovigilance for antiretrovirals in resource-poor countries*. Geneva: WHO. http://www.who.int/medicines/publications/PhV\_for\_antiretrovirals.pdf

#### SAFETY MONITORING OF HERBAL MEDICINES IN THE NATIONAL PHARMACOVIGILANCE SYSTEM

In developing countries, some herbal medicines are considered to be more readily available, accessible, affordable, culturally acceptable and sustainable than Western medicines. In developed countries, the popularity of herbal medicines continues to grow, particularly for treating certain disease categories.

However, herbal medicines are not necessarily always safe simply because they are natural. Some have given rise to serious adverse reactions and some contain chemicals that may produce long-term side effects such as carcinogenicity and hepatotoxicity. Herbal medicines will only benefit the health of human beings when they are used appropriately. Thus, good quality control and standardization of herbal medicines are essential. Furthermore, with the increased use of both herbal medicines and modern western pharmaceutical drugs, there is a need to monitor interactions.

Reporting adverse events related to herbal medicines shall be the same as for the other health products mentioned in this guideline and shall involve cooperatives made up of traditional healers that are officially approved by the appropriate authorities.

The national policy on traditional and herbal medicine as well as related guidelines shall be the referral and support documents.

#### TOOLS FOR MEDICINE SAFETY SURVEILLANCE ACTIVITIES

Pharmacovigilance activities involve the use of several validated tools to generate and analyze data to guide decisions. In an effort to standardize all pharmacovigilance and medicine information system processes in Rwanda, the following tools have been developed and adopted for key activities of the NPMIC.

#### **Adverse Event Notification Form**

The Adverse Event Notification Form (annex A–French; annex B–English) is the official tool by which all suspected adverse events shall be reported. It is designed to be short, simple, and easy to complete. The notification form collects important details pertaining to the suspected adverse events. The form should be used for the following events—

- All suspected adverse events related to the use of medicines and medical devices
- All suspected adverse events related to the use of complementary and alternative medicines, traditional/herbal medicines, and cosmetics, nutritional and dietary supplements

#### Medicine Information Request Form

The medicine information request form (annex E) is the official tool in Rwanda for making requests to the NPMIC for information related to medicines or health products and related pharmacotherapy issues. The scope of what can be included in a request for medicine information includes—

- Mode of administration and dosage
- Indication and choice of therapy
- Interactions (drug-drug, drug-disease, etc.)
- Adverse effects and toxicities
- Management of poisoning
- Product identification, packaging, labeling
- Product manufacturer and availability
- Medicine utilization data
- Disease profile and management
- Recent evidence and studies on specific diseases and medicines
- Epidemiology of diseases in Rwanda
- Any other related questions

Requesting for medicine information can also be through phone calls and e-mail messages. Clients are requested to clearly specify what information they seek so that they can receive answers that precisely answer their questions. The NPMIC has developed standard tools for providing responses to the enquirer.

## Causality Assessment Tool

After adverse event reports are received, the NPMIC works closely with the MSC to determine causality between the reported event and the health products the patient or consumer would have been exposed to. There are several scales for determination of causality. In Rwanda, the NPMIC will use the WHO causality assessment criteria as the official reference for deciding on the contribution of the health product to the adverse event. The criteria are classified as Certain, Probable/Likely, Possible, Unlikely, inaccessible/unclassified, and conditional/unclassified. The WHO causality assessment criteria tool is attached as annex F.

# Adverse Event Severity Grading Scale

When adverse events are reported in Rwanda, the severity of the event will be determined through an evaluation of the report, medical records, and further discussions with the reporter. Understanding of the severity of adverse events will guide the decisions about adverse events that are of importance for further studies in Rwanda. It will also provide information for the education of health care workers on adverse events and their management. In Rwanda, the WHO Toxicity Grading Scale for determining the severity of adverse events will be the official reference for the grading of severity of adverse events. The tool is attached as annex G.

# **Medication Error Assessment Tool**

When medication errors are identified and reported, there are opportunities for learning from the experience and preventing further errors. The NPMIC provides advocacy and resources for the monitoring and learning from medication errors and patient safety problems. In Rwanda, the American National Coordinating Council for Medication Error Reporting and Prevention Index, (NCC MERP) will be the official reference for grading medication errors in Rwanda. The NCC MERP index is attached as annex H.

# **Patient Alert Card**

The Patient Alert Card notifies all health care providers that its bearer has experienced some serious intolerance (typically hypersensitivity reactions) to a particular medicine. This will help them to identify the patient's drug-related intolerence and prevent the same (or similar) drug reactions. The card is expected to be carried by the patient all the time and must be presented to health care providers during consultation or dispensing time . The Patient Alert Card for official use in Rwanda is attached as annex I (annex J is Patient Alert Card in Kinyarwanda ). This card will be delivered by PV subcommittee and inform NPMIC for registration.

# **Glossary of Medicine Safety Terms**

To ensure common understanding of all terms used in medicine safety surveillance activities in Rwanda, standard official definitions as applicable to Rwanda have been provided for relevant pharmacovigilance and medicine safety terminologies. Users are encouraged to review these terms and use them in the same definition and meaning as it has been provided in this document. The official glossary of medicine safety terms are provided as annex K.

All health care workers are encouraged to use these tools as indicated and continuously provide positive criticisms on their improvement to the NPMIC. The NPMIC, in consultation with various stakeholders, will review these guidelines and tools periodically, to ensure that they continue to meet the goals of pharmacovigilance and medicine information activities in Rwanda.

#### CAPACITY BUILDING

Staff members working at health facilities require continuous capacity building activities on pharmacovigilance. ADRs are not well understood and, in many countries, are seldom detected. Attention to monitoring also may be neglected, and thus staff members need to stay aware that ADR monitoring is part of their good clinical practices. Trainings are required to ensure that staff members understand prescribing practices for new medicines, the correct dosage regimen, and how treatment failures are managed. Staff members also need to be taught how to detect ADRs, where to refer the patients, and how to complete the ADR reporting form accurately. In addition, continuous clinical guidance for improved recognition of adverse reactions is required. Staff will need to feel confident and motivated in reporting while assisting the NPMIC in its mission. Common concerns and barriers to reporting by health care personnel will be addressed in such capacity building activities.

The MoH, through technical assistance of SPS, has developed the National Curriculum and Training Module for pharmacovigilance. The purpose of this training is to equip all health care workers across the health care delivery system with the necessary skills, knowledge, and attitudes that will enable them to effectively identify, assess, and report ADRs; and take appropriate action to improve medicine safety. The trainings will start with a training of trainers limited to a small number of health care providers, essentially doctors and pharmacists, who will be subsequently called upon to conduct the national training for selected DTC members at the hospital level. With the support of training of trainers' core group, NPMIC will supervise service trainings throughout the country at district level, using the trained DTC members as trainers in their respective health facilities.

The NPMIC will routinely coordinate any other capacity building activities at national and hospital level to ensure the correctness and relevance of the delivered information while avoiding unnecessary dispersion of efforts.
## MONITORING AND EVALUATION

For effective pharmacovigilance and medicine information activities in Rwanda, the NMRA shall identify some performance measures for monitoring pharmacovigilance activities of both NPMIC and the PHPs. These performance measures include indicators, reports, and performance targets that will be routinely reported to the NMRA.

## ANNEX A. ADVERSE EVENT NOTIFICATION FORM (FRENCH)



#### MINISTERE DE LA SANTE

#### CENTRE NATIONAL DE PHARMACOVIGILANCE ET D'INFORMATION PHARMACEUTIQUE FICHE DE NOTIFICATION DES EVENEMENTS INDESIRABLES

#### A. Informations sur le patient

Adresse du patient	Village :		Secteur			
	Cellule :		District			
Autres adresses disp	onibles (téléphone/em	ail)				
Nº d'identification du	ı patient (N0 fiche,	Date naissance///	Poids (Kg)	Taille (en cm)	Sexe	
consultation, etc.)		ou Age			ΠF	
					ШΜ	
Grossesse ? Oui Non Pas Connu Si oui, Age gestationnel (en Semaine d'aménorrhée):			La femme enceinte est :  Primipare Multipare			
Le patient a-t-il une (	des) maladie(s) chroni	que(s) ? 🗆 Oui 🗆 Non 🗖 Pas connu	1			
Si Oui, lesquelles (co	ompléter ci devant et ei	n bas si nécessaire)				
2	3		4			
Facteurs de risque as	sociés (encerclez): taba	ntécédent familiale,	les allergies,).	Décrivez		
les autres facteurs as	socies si il y en a (ajoute					

# **B. Informations sur les événement indésirables susceptibles d'être dus au produit de santé** Description de l'événement indésirable :

Date et heure de début de réac		elai d'apparition					action si applicable	
/àh	he	ures/jours):		hh				
<b>INFORMATION SUR LE PR</b>	ODUIT DE	SANTE SUSPE	CTE					
Nom du produit en DCI ou no	om vernacul	aire, forme et do	sage :	Nom de la spécia	alité/fabr	icant :		
Date de fabrication :	Date	d'expiration :			No d	e Lot/batch	N⁰∶	
Le produit est il prescrit ? 🗖 G Non	Dui 🗖	Pour quelle ra	ison le j	produit a-t-il été pi	rescrit (in	dication) :		
Dose Prescrite :		Fréquence pre	scrite :				Duré	ée du traitement
Dose prise :		Fréquence de	prise pa	ır jour :				
Date/si possible heure de début de prise du produit :				Date/ si possible heure d'arrêt de prise du produit :				
Voie d'administration utilisée	par le patie	nt :		Détails sur la dilution (si applicable) :				
Où est-ce que le patient s'est-i	l procuré le	produit ?:						
est ce la première fois que le p	roduit suspe	ecté est pris ? 🗖	Oui 🗖	Non Si Non l'effet	t était-il a <sub>l</sub>	pparu aupara	avant	🛛 Oui 🗖 Non
Y a-t-il eu des mesures prise p	our gérer/ti	aiter l'événemer	nt indés	irable ? 🗖 Oui 🗖	Non			
Si oui, spécifier les moyens utilisés pour gérer l'effet indésirable observé (traitement médicamenteux, référence, arrêt du traitement, conseils, changement de traitement,)								
Evolution de l'événement inc	lésirable							
	Hospitalisati		$\square$ M	lise en jeu du pron	ostic	Décès		□ autre : spécifier
séquelles 🗖	Prolongation		vi			Pas con	nu	
□Pas encore guéri d'h		tion 🛛 Incapacité per						

C. Autres produits utilisés Y a-t-il d'autres produits utilisés par le patient ? 🗆 Oui 🗖 Non Si oui compléter le tableau cidessous

(Ajouter une feuille supplémentaire si nécessaire)

	1	2	3
Nom du produit			
Indication			
Posologie utilisée par le patient			
Voie d'administration telle que utilisée par le			
patient			
Date (et si possible heure) de début			
Date (et si possible heure) d'arrêt			

#### D. Informations sur le notificateur

Nom et Prénom *	
Qualification * :	Lieu de travail /FOSA*
Adresse postale* :	Téléphone du lieu de travail/FOSA *
Email :	Date*

Votre appui au système de pharmacovigilance est grandement apprécié.

La soumission d'une plainte n'implique en aucun cas que le médicament ou le prestataire des soins ont causé ou contribué à l'apparition de cet événement. Toute information est strictement confidentielle et le personnel du système de pharmacovigilance ne mettra jamais en public l'identité du rapporteur en réponse à une quelconque demande publique.

L'information que vous fournissez contribuera dans l'amélioration de la qualité des soins et la sécurité d'utilisation du médicament.

Une fois remplie, veuillez envoyer cette fiche au Centre National de Pharmacovigilance ou au sous comité de Pharmacovigilance dans l'hôpital qui vous est proche

#### Que peut vous apporter le CNPIP ?

Le CNPIP est au service de tous les professionnels de santé tant du secteur public que privé pour :

- Recueillir et analyser toute suspicion suggérant un effet indésirable dû à un produit de santé afin d'établir la relation de cause à effet
- Répondre aux questions relatives à l'utilisation des produits de santé
- Evaluer les risques d'une exposition aux produits de santé chez les personnes à haut risque
- Diffuser les informations sur la pharmacovigilance aux professionnels de la santé, aux patients/consommateurs et au grand public

#### Notification des effets indesirables au CNPIP

La pharmacovigilance a pour objet la détection, l'évaluation et la prévention des effets indésirables de tout produit de santé survenant dans une population.

Les produits de santé concernés par cette notification sont :

- Les produits pharmaceutiques
- Le sang et ses dérivés
- Autres produits de santé notamment les produits alimentaires et cosmétiques, ainsi que les produits biologiques tels que les cellules humaines, les tissus, et les produits à base de cellules ou de tissus.

## Qui doit notifier?

• Tous les professionnels de santé

## Que faut-il notifier ?

• Tout événement indésirable, clinique ou biologique, observé chez un patient et coïncidant avec l'exposition à un produit de santé, connu ou non connu, grave ou bénin.

## Comment notifier ?

- La notification du cas doit se faire sur cette « fiche de notification des effets indésirables » du Ministère de la Santé.
- La notification du cas peut se faire par :
  - Courrier : BP 84 Kigali
  - o Téléphone : 114
  - Personne de contact : Ruzindaza Alexis
  - E-mail : ptfmoh@yahoo.fr
  - Site web : <u>www.moh.gov.rw</u>

## Veuillez noter que :

- La notification du cas se fait même si vous n'êtes pas sûrs que ce soit le produit suspecté qui est à la base de l'effet indésirable ou quand vous n'avez pas suffisamment de données.
- La soumission d'une fiche de notification n'implique pas automatiquement que le professionnel de santé ou le produit a causé ou contribue à l'apparition de l'effet indésirable
- La fiche de notification remplie doit être acheminée vers le niveau supérieur endéans 48 heures
- Toutes les informations rapportées sur cette Fiche sont strictement confidentielles.
- Les informations sur le notificateur qui sont accompagne du signe \* sont obligatoire
- Pour les sites ART, le dispensateur des soins identifiera le patient par son code TRACNET.

## ANNEX B. ADVERSE EVENT NOTIFICATION FORM (ENGLISH)



National Center for Pharmacovigilance and Medicine Information Adverse Event Notification Form

#### **A.** Patient Information

Patient	Village :		Sector:				
address	Cell :		District:				
Other available	address (cell ph	one/email,)					
N° of patient file	e/dossier	Date of birth					
		//	weight (Kg)	height(	Sex 🗆 F 🗆 M		
		or age		cm)			
• •	Pregnancy? □ Yes □ No If yes, indicate the length			t woman is : E	🛛 primiparous 🗖		
Don't know		of pregnancy in weeks	multiparous				
		(amenorrhea weeks):					
	nt have any chror	nic diseases? 🛛 yes 🗆 No	1				
□ don't know							
	,	etes, tuberculosis) in the					
, v	( you can add ar	nother paper if needed)					
2		3	4				
Associate risk f	actors (tick on th	e following ones): tobacco use	e, alcohol use,	clinical backg	round, familial		
history, allergies				-			
Describe any of	ther risk factors in	f applicable ( <i>you can add a ne</i>	ew paper on thi	is if needed):			
				,			

#### B. Information on adverse events related to suspected health product

Description of the adverse event :						
Date and time of when adverse reaction Time to ons			set of reaction	Date	and time when reaction stopped	
started		(hour	s/day	ys):	/	/ athmin
// ath min						
INFORMATION ON THE SUS	PECTI	ED HEALTH P	ROD	UCT		
Name of the product en INN or	local n	ame ( if plant		Brand name/manufactu	re :	
medicine), form and dosage :						
Manufacture date :	Expir	ired date : Batch Nº :			• :	
	<u> </u>	76-1 1 -				
The product was prescribed? $\Box$	yes	If the product	was p	prescribed, indicate the rea	son why	
□ No						
Dosage Prescribed :		Frequency of a	laily	dosing prescribed : Treatment duration		Treatment duration
Dosage taken :		Frequency of a	laily	dosing use by patient:		
Date, if possible the time of the s	starting	taking the	ř	Date, if possible, the time the suspected product was stopped:		
suspected product:						
The administration route used by patient :			Details on the dilution (if applicable) :			
Where patient has been provided with this product?						

Is it the first time the patient has taken the suspected product?  $\Box$  yes  $\Box$  No If no, did he experiment the same reactions the last time he take this product  $\Box$  yes  $\Box$  No

Is there any measure taken to manage / treat this adverse event?  $\Box$  yes  $\Box$  No

If yes, indicate these measures (pharmaco-therapy, refer the patient, stop the treatment, change the treatment, etc....)

# Evolution of adverse event Image: Constraint of the second se

# **C. Other product used:** Is there any other product used by patient? Yes No If yes, fill the table below

(Add a new page if needed)

	1	2	3
Name of the Product			
Indication			
Dosage used by patient			
Administration route used by patient			
Date (time if applicable ) of start to take the			
product			
Date (time if applicable) of stop to take the			
product			

#### D. Information on the notificator

Name *	
Qualification * :	Place of Works/Health Facility*
PO box* :	Phone number/yours or for the Health Facility*
Email :	Date*

#### Your support in this pharmacovigilance program is appreciated.

Submission of a complaint does not constitute an admission that medical personnel or manufacturer or the product caused or contributed to an event.

All information is held in strict confidence and programme staff is not expected to and will not disclose reporter's identity in response to any public request. Information supplied by you will contribute to the improvement of medicine safety and therapy in Rwanda.

Once completed please send to: National Pharmacovigilance and Medicine Information Center or to the Drug and Therapeutic Committee (DTC) of the hospital which is near of you.

## ANNEX C. POOR MEDICINE QUALITY NOTIFICATION FORM (FRENCH)

#### **REPUBLIQUE DU RWANDA**



## **CENTRE NATIONAL DE PHARMACOVIGILANCE ET D'INFORMATION PHARMACEUTIQUE**

#### MINISTERE DE LA SANTE

## FICHE DE NOTIFICATION SUR LA QUALITE DES MEDICAMENTS

#### A. Informations sur le rapporteur

1		1. patient				
statues		2. Profession	nnel de la santé			
3		3. autres : sp	pécifier :			
Adresse du	Village :		Secteur			
rapporteur	Cellule :		District			
Autres adresses disponibles (téléphone/email, lieux de travail etc)			tc)			
Le rapporteur a-t-il pris le médicament			🗖 Oui 🗖 Non			

#### B. Identification du produit

Non de spécialité			Non générique				
Numéro de lot	Date de fa	abrication		Date de			
				péremption			
Date d'acquisition/achat	Nom du						
	producter						
	pays d'or	igine					
Nom du fournisseur (nom			Adresse du				
de l'hôpital, pharmacie,			distributeur				
etc)							
FORMULATION DU PRODUIT (co	ocher sur le	PLAIN	<b>FES A L'ENCON</b>	NTRE DU PR	ODUIT (cochez sur		
cas échéant)		le cas éch	éant)				
Comprimé Oral/Capsule		hangen	nent de couleur				
uspension buvable		gglomé	ration/ grumeaux				
lirop		isqueux (formes solides)					
njection		hangement d'odeur					
Oudre pour reconstitution d'une suspension		éparation des composants					
Poudre pour reconstitution d'une injection		ffritement					
Gouttes nasale		Lauvaise étiquetage					
Goutte Oculaire		onditio	nnement incomplet				
Jolution nébuliseur		utres :					
Crème/ gel/pommade							
Autres :							
Décrivez en détail votre							
plainte	••••••	•••••					
	••••••	•••••					
	••••••	•••••					

#### C. Condition de stockage

Le produit requiert il une réfrigération ?	Dui	Ion	Autres : détailler
Le produit est il disponible à la Formation Sanitaire ?	Dui	Ion	
Le produit est il retournée par le patient après qu'il ait été dispensé	D <sup>ui</sup>	Ion	
La conservation/stockage du produit est elle conformes aux directives du producteur ou du MINISANTE	Dui	Don	

#### D. Circonstance et moment de detection du probleme de la qualite du produit

	1 1				
A quel moment avez-vous constaté que le médicament avait un	Dans quelle circonstance avez-vous constaté ce problème				
problème de qualité	de qualité				
Avant la prise du médicament	A la suite d'une complication de l'état d'un				
Au cours de la prise du médicament	patient/ami(e)/parent après la prise du médicament				
A la fin de la prise du médicament	la suite d'une hospitalisation du patient après la prise				
Quand un proche (parent ou ami/e) a pris ce médicament	du médicament				
	la suite d'une plainte du patient				
Autres :					
spécifiez	la suite d'un constat personnel dans le lieu de stockage				
	du médicament				
Si vous ou quelqu'un d'autres aviez déjà pris ce médicament avez-vous constaté des symptômes/signes cliniques suspects ?					
Oui no i oui veuillez rem lir la fiche de notification des événements indésirables.					

#### Votre appui au système de pharmacovigilance est grandement apprécié.

La soumission d'une plainte n'implique en aucun cas que le médicament ou le prestataire des soins ont causé ou contribué à l'apparition de cet événement. Toute information est strictement confidentielle et le personnel du système de pharmacovigilance ne mettra jamais en public l'identité du rapporteur en réponse à une quelconque demande publique.

L'information que vous fournissez contribuera dans l'amélioration de la qualité des soins et la sécurité d'utilisation du médicament. Une fois remplie, veuillez envoyer cette fiche au Centre National de Pharmacovigilance ou au sous comité de Pharmacovigilance dans l'hôpital aui vous est proche

## ANNEX D. POOR MEDICINE QUALITY NOTIFICATION FORM (ENGLISH)

**REPUBLIC OF RWANDA** 



#### MINISTRY OF HEALTH

#### NATIONAL CENTER FOR PHARMACOVIGILANCE AND MEDICINE INFORMATION MEDICINE POOR QUALITY NOTIFICATION FORM

#### A. Information on the notificator

Please tick on your status		1. Patient	1. Patient		
		2. Health car	e professional		
		3. Other (sp	ecify)		
Address of	Village :		Sector		
notificator	Cell :		District		
Any other available address (cell phone/email,)					
Has the person who made the notification come in direct conta			t 🛛 Yes 🗆 No		
with the reported product?					

#### **B.** Product identity

Brand Name			Generic name			
Batch/ lot number	Date of			Date of expiry		
	manufacture					
Date of receipt	Name of					
	manufacture	er				
Name of			Distributor/supplier's			
distributor/supplier			address			
PRODUCT FORMUL	ATION (tick appropriate box)	<b>COMPLAINT</b> (tick appropriate box/boxes)				
Oral tablet/capsule		Colo	our change			
Oral suspension/syrup		Sepa	arating			
Injection		Pow	/dering/crumbling			
Diluent		Caking				
Powder for reconstitution	of suspension	Moulding				
Powder for reconstitution	of injection	Change of odour				
Eye drop		Mislabelling				
Ear drop		Incomplete pack				
Nebuliser solution		Other:				
Cream/ointment/linimen	.t/paste					
other :						
Describe complaint in						
detail					•••••	
		•••••		••••••		
				••••••		

#### C. Storage conditions

Does the product require refrigeration?	Yes	No	Others details(if necessary):
Was the product available at facility?	Yes	No	
Was product dispensed and returned by client?	Yes	No	
Was the product stored according to manufacturer/MoH	Yes	No	
recommendations			

#### D. Circumstance and time of poor quality detection

At which time did you notice that the poor quality problem? Before taking the product While I took the product After I took the product When relatives took the product When my patient took this product	In which circumstance did you notice the poor quality problem? When I notice complication of my patient/relatives after he or she took this product When a patient was hospitalized after taking this product After a complaint of patient who is under this medication After personally observing experience the poor quality of this		
Other	medicines in the storage room		
Have you experienced any adverse event or did you Yes No	receive any complaint after taking this medicine?		

If you, or any other person has already take this medicine and experienced any health problem, please complete the adverse event notification form.

#### Your support in this pharmacovigilance program is appreciated.

Submission of a complaint does not constitute an admission that medical personnel or manufacturer or the product caused or contributed to an event.

All information is held in strict confidence and programme staff will not disclose reporter's identity in response to any public request. Information supplied by you will contribute to the improvement of medicine safety and therapy in Rwanda.

Once completed, please send to: National Pharmacovigilance and Medicine Information Center or to the Drug and Therapeutic Committee (DTC) of the hospital which is nearest you.

## ANNEX E. MEDICINE INFORMATION REQUEST FORM

Date:	Time F	Received:
Received by:		
Name of Requester:		
Requester Identity:		Patient
requerci factory.		Pharmacist
		Physician
		Nurse
		Other (specify)
Preferred method of delivery:		Phone Phone
referred method of dentery.		Fax
		Email
		Mail
References required:		YES
		NO
Contact information	Phone	number:
	Faxinu	
		address:
	Mailin	g address:
		,
	<u> </u>	
Response needed/given in:		Instantly
		10 min
		30-60 min
		End of day
		When time permits
Summary of the question		
Pertinent Background Information (if possible,		Known allergy :
provide more details on the chosen information)		Chronic illnesses:
provide more decails on the chosen information		
		Pregnancy:
		Breastfeeding: Concurrent medications :
		01
		Others:
Type of Request:		Indication/choice of therapy
		Therapeutics Alternatives
		Dosage
		Mode of Administration
		Mode of action
		Toxicity
		Contra-indications
		Precautions to be taken while on treatment
		Adverse Drug Reaction
		Interactions (Drug-drug/drug-disease/drug-food)
		Medicine Identification/Packaging/labelling
		Product availability
		Other (specify)
Search Strategy:		Consultation of other colleagues
·····;,·		Consultation of specialists
		Documentation in a book/article/journal
		Internet documentation
		Others (please specify)
Response given :	<u> </u>	ovaria (bioga abecuá)
nesponse given :	1	
	1	
Diference :	⊢	
References:	1	
	1	

## ANNEX F. WHO CAUSALITY ASSESSMENT CRITERIA

## Causality assessment criteria<sup>1</sup>

#### **1.** Certain :

- Clinical event, including laboratory test abnormality, occurring in a plausible time relationship to drug administration, and which
- Cannot be explained by concurrent disease or other drugs or chemicals.
- Response to withdrawal of the drug (dechallenge) should be dinically plausible.
- Event must be definitive pharmacologically or phenomenologically, using a satisfactory rechallenge procedure if necessary.

#### 2. Probable/Likely:

- Clinical event, including laboratory test abnormality, with a reasonable time sequence to administration of the drug
- Unlikely to be attributed to concurrent disease or other drugs or chemicals, and
- which follows a dinically reasonable response on withdrawal (dechallenge)
- Rechallenge information is not required to fulfill this definition.

#### 3. Possible:

- Clinical event, including laboratory test abnormality, with a reasonable time sequence to administrations of the drug, but which
- Could also be explained by concurrent disease or other drugs or chemicals
- Information on drug withdrawal may belacking or unclear.

#### 4. Unlikely:

- Clinical event, including laboratory test abnormality, with a temporal relationship to drug administration which makes a causal relationship improbable, and in which.
- Other drugs, chemicals or underlying disease provide plausible explanations.

#### 5. Conditional/Unclassified:

- Clinical event, including laboratory test abnormality, reported as an adverse reaction, about which
- More data is essential for a proper assessment, or the additional data is under examination.

#### Unassessable/Unclassifiable:

- Report suggesting an adverse reaction which
- Cannot be judged because information is insufficient or contradictory, and which
- Cannot be supplemented or verified.

<sup>&</sup>lt;sup>1</sup> WHO\_Causality\_categories in WHO (2000) Safety Monitoring of Medicinal Products: Guidelines for setting up and numing a Pharmacovigilance Center, the Uppsala Monitoring Centre (the UMC), WHO Collaborating Centre for International Drug Monitoring, ISBN 91-630-9004-X

## ANNEX G. WHO TOXICITY GRADING SCALE

#### Appendix: WHO TOXICITY GRADING SCALE FOR DETERMINING THE SEVERITY OF ADVERSE EVENTS

CHEMISTRIES (contin	ued)			
Hyperglycemia (note if fasting)	116 - 160 mg/dL	161-250 mg/dL	251 - 500 mg/dL	> 500 mg/dL or ketoacidosis or seizures
Hypocalcemia (corrected for albumin)	8.4 - 7.8 mg/dL	7.7 - 7.0 mg/dL	6.9 - 6.1 mg/dL	< 6.1 mg/dL or life threatening arrhythmia or tetany
Hypercalcemia (correct for albumin)	10.6 - 11.5 mg/dL	11.6 - 12.5 mg/dL	12.6 - 13.5 mg/dL	> 13.5 mg/dL life-threatening arrhythmia
Hypomagnesemia	1.4 - 1.2 mEq/L	1.1 - 0.9 mEq/L	0.8 - 0.6 mEqL	< 0.6 mEq/L or life- threatening arrhythmia
Hyp oph os phatemia	2.0 - 2.4 mg/dL	1.5 -1.9 mg/dL or replacement Rx required	1.0 -1.4 mg/dL intensive Rx or hospitalization required	< 1.0 mg/dL or life- threatening arrhythmia
Hyperbilirubinemia	1.1-1.5 x ULN	1.6 - 2.5 x ULN	2.6 - 5 x ULN	> 5 x ULN
BUN	1.25 - 2.5 x ULN	2.6 - 5 x ULN	5.1 - 10 x ULN	>10 x ULN
Creatinine	1.1 x 1.5 x ULN	1.6 - 3.0 x ULN	3.1 - 6 x ULN	> 6 x ULN or required dialysis
URINALYSIS				
Proteinaria	1+ or < 0.3% or <3g/L or 200 mg - 1 gm loss/day	2 -3 + or 0.3 - 1.0% or 3-10 g/L 1- 2 gm loss/day	4+ or > 1.0% or > 10 g/L 2-3.5 gm loss/day	nephrotic syndrome or > 3.5 gm loss/day
Hematuria	microscopic only	gross, no clots	gross+ clots	obstructive or required transfusion
CARDIAC DY SFUNCT	TION			
Cardiac Rhythm		asymptomatic, transient signs, no Rx required	recurrent/persistent; No Rx required	requires treatment
Hypertension	transient inc. > 20 mm; no Rx	recurrent, chronic, > 20 mm, Rx required	requires acute Rx; No hospitalization	requires hospitalization
Hypotension	transient orthostatic hypotension, No Rx	symptoms correctable with oral fluids Rx	requires IV fluids; no hospitalization required	requires hospitalization
Pericarditis	minimal effusion	mild/moderate asymptomatic effusion, no Rx	symptomatic effusion; pain; EK G changes	tamponade; pericardiocentesis or sargery required
Hemorrhage, Blood Loss	microscopic/occult	mild, no transfusion	gross blood loss; 1-2 units transfused	massive blood loss; > 3 units transfused

Section VIII: Appendices Monitoring and Reporting Adverse Events

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#### Appendix: WHO TOXICITY GRADING SCALE FOR DETERMINING THE SEVERITY OF ADVERSE EVENTS

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RESPIRATOR Y				
Cough	transient- no Rx	treatment associated cough local Rx	uncontrolled	
Bronchospasm, Acute	transient; no Rx $< 8.0\%$ - 70% FEV <sub>1</sub> (or peak flow)	requires Rx normalizes with bronchodilator; FEV <sub>1</sub> 50% - 70% (or peak Flow)	no normalization with bronchodilator; FEV <sub>1</sub> 25% - 50% (or peak flow retractions)	cyanosis: FEV <sub>1</sub> < 25% (or peak flow) or intubated
GASTROINTESTINAI	L	•	•	
Stomatitis	mild discomfort; no limits on activity	some limits on eating/drinking	eating/talking very limited	requires IV fluids
Nausea	mild discomfort; maintains reasonable intake	moderate discomfort; intake decreased significantly; some activity limited	severe discomfort; no significant intake; activities limited	minimal fluid intake
Vomiting	transient emesis	occasional/moderate vomiting	orthostatic hypotension or IV fluids required	hypotensive shock or hospitalization required for IV fluid therapy
Constipation	mild	moderate	severe	distensions w/vomiting
Diarrhea	transient 3-4 loose stools/day	5-7 loose stools/day	orthostatic hypotension or > 7 loose stools/day or required IV fluids	hypotensive shock or hospitalization for IV fluid therapy required
NEURO & NEUROMUSCULAR				
Neuro-Cerebellar	slight incoordination dysdiado chokinesis	intention tremor, dysmetria, slurred speech; nystagmas	locomotor ataxia	incapacitated
Mood	mild anxiety or depression	moderate anxiety or depression and thempy required	severe anxiety or depression or mania; needs assistance	acute psychosis; incapacitated, requires hospitalization
Neuro Control (ADL = activities of daily living)	mild difficulty concentrating; no Rx; mild confusion/agitation; ADL unaffected	moderate confusion/agitation some limitation of ADL; minimal Rx	severe confusion/agitation needs assistance for ADL; thempy required	toxic psychosis; hospitalization
Muscle Strength	subjective weakness no objective symptoms/ signs	mild objective signs/symptoms no decrease in function	objective weakness function limited	paralysis

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#### Appendix: WHO TOXICITY GRADING SCALE FOR DETERMINING THE SEVERITY OF ADVERSE EVENTS

OTHER PARAMETER	s			
Fever: oral, > 12 hours	37.7 - 38.5 C or 100.0 - 101.5 F	38.6 - 39.5 C or 101.6 - 102.9 F	39.6 - 40.5 C or 103 - 105 F	> 40 C or > 105 F
Headache	mild, no Rx therapy	transient, moderate; Rx required	severe; responds to initial narcotic thempy	intractable; required repeated narcotic therapy
Fatigue	no decrease in ADL	normal activity decreased 2.5- 50%	normal activity decreased > 50% can't work	unable to care for self
Allergic Reaction	pruritus without rash	localized urficaria	generalized urticaria; angio edema	anaphylaxis
Local Reaction	tenderness or erythema	induration < 10 cm or phlebitis or inflammation	induration > 10 cm or ulceration	necrosis
Mucocutaneous	erythema; pruritus	diffuse, maculo papular rash, dry desquamation	vesiculation, moist desquamation, or ulceration	exfoliative dermatitis, mucous membrane involvement or erythema, multiforme or suspected Stevens- Johnson or necrosis requiring surgery

http://www.icssc.org/Documents/Resources/AEManual2003AppendicesFebruary\_06\_2003%20fi nal.pdf

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## ANNEX H. MEDICATION ERROR REPORTING AND PREVENTION SCALE



## ANNEX I. PATIENT ALERT CARD (ENGLISH)



MINISTRY OF HEALTH

## PATIENT ALERT CARD

Patient name:
Date of birth: Gender : M F Height: ID/passport numb
Place of issue of the alert card: PV subcommittee of Hospital
Date when the card was issued:/
Responsible medicine:
Types of intolerance:

Please hold always this card with you to be presented to any health care provider in any consultation session.

Itwaze iteka iyi karita kandi wibuke kuyereka muganga mu gihecyose ugiye kwivuza.

Signature and stamp of PV subcommittee

## ANNEX J. PATIENT ALERT CARD (KINYARWANDA)



MINISITERI Y'UBUZIMA

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-----Y'UMURWAYI

amazina y'umurwayi
Igihe yavukiye cyangwa imyaka:
Igitsina : Gabo 🗌 Gore 🗌
Uburebure:
Nimero y'indangamuntu/pasiporo:
Aho iyo karita yandikiwe: Ibitaro bya
Itariki iyo karita yandikiweho:///
Ubwoko b'ingaruka mbi yatewe n'umuti:
Izina/ubwoko ry'umuti wateye icyo kibazo:

T

Itwaze iteka iyi karita kandi wibuke kuyereka muganga mu gihecyose ugiye kwivuza. Kasha y'ibitaro handikiwe ino karita

## ANNEX K. GLOSSARY OF MEDICINE SAFETY TERMS

## http://psnet.ahrq.gov/glossary.aspx

#### Adverse medicine reaction (AMR)/adverse drug reaction (ADR)

A response to a medicine which is noxious and unintended, and which occurs at a dose normally used in humans for prophylaxis, diagnosis, or therapy of disease, or for the modification of physiological function.

The term adverse drug reaction should be considered for harmful or seriously unpleasant effects occurring at doses intended for therapeutic, prophylactic or diagnostic effect and which calls for reduction of dose or withdrawal of the drug and/or forecast hazard from future administration.

#### Adverse event /adverse experience

Any untoward medical occurrence that may present during treatment with a pharmaceutical products but which does not necessarily have a causal relationship with the treatment.

#### **Medication error**

A medication error is any preventable event that may cause or lead to inappropriate medication use or patient harm while the medication is in the control of the health care professional, patient, or consumer. Such events may be related to professional practice, health care products, procedures, and systems, including prescribing; order communication; product labeling, packaging, and nomenclature; compounding; dispensing; distribution; administration; education; monitoring; and use.

(Source: National Coordinating Council for Medication Error Reporting and Prevention. Available from: <u>http://www.nccmerp.org/aboutMedErrors.html</u>)

#### **Medicine/Drug**

A pharmaceutical product, used in or on human body for the prevention (prophylaxis, mitigation diagnosis) or treatment of disease, or for the modification of physiological function.

#### Medicine safety surveillance

The processes involved in the collection, collation, analysis, and dissemination of data and other activities carried out in relations to safeguarding the safety and effectiveness of pharmaceuticals and related products

#### Medicine safety system

All organisations, institutions, and resources that contribute to efforts, whether in personal health care, public health services or through intersectorial initiatives, whose primary purpose is to protect the public from harm related to the use of medicines.

#### Periodic safety update report

A periodic safety update report is an update of the worldwide safety experience of a product obtained at defined times post registration.

## Pharmacovigilance

Pharmacovigilance is the science and activities relating to the detection, assessment, understanding and prevention of adverse effects or any other possible drug-related problems. Recently, its concerns have been widened **to** include **herbals**, traditional **and** complementary **medicines**, blood **products**, biologicals, medical **devices** and **vaccines**.

## Serious adverse event

Serious adverse event is any untoward occurrence that

- **1.** Is life-threatening or fatal
- 2. Causes or prolongs hospital admission
- 3. Causes persistent incapacity or disability
- 4. Concerns misuse or dependence
- **5.** Causes congenital anomaly/birth defect

## Signal

A signal refers to "reported information on a possible causal relationship between an adverse event and a drug, the relationship being unknown or incompletely documented previously." Usually more than a single report is required to generate a signal, depending upon the seriousness of the event and the quality of the information.

## Side effect

Any unintended effect of a pharmaceutical products occurring at doses normally used in patients, which is related to the pharmacological proprieties of the medicine

#### Spontaneous reporting

A system whereby case reports of adverse drug events are voluntarily submitted by health professionals and pharmaceutical manufacturers to the national regulatory authority/ pharmacovigilance centre

#### Toxicity

Toxicity implies cell damage from a direct action of the drug, often at a high dose, e.g., liver damage from paracetamol overdose.

#### **Unexpected adverse reaction**

An adverse reaction, the nature or severity of which is not consistent with domestic labeling or market authorization, or expected from the characteristics of the drug.

#### Aims of pharmacovigilance

The specific aims of pharmacovigilance are to-

- Improve patient care and safety in relation to the use of medicines and all medical and paramedical interventions
- Improve public health and safety in relation to the use of medicines
- Detect problems suspected to be caused by medicines and communicate the findings in a timely manner
- Contribute to the assessment of benefit, harm, effectiveness and risk of medicines, leading to the prevention of harm and maximization of benefits;

- Encourage safe, rational and more effective (including cost-effective) use of medicines;
- Promote understanding, education and clinical training in pharmacovigilance and its effective communication to the public.

## Annex 13 : Definition and classification of ADRs

WHO defines adverse reaction as a response to a medicine which is noxious and unintended, and which occurs at doses normally used in patients. In this prescription, it is of importance that it concerns the response of a patient in which individual factors may play an important role, and that the phenomenon is noxious.

A classification of ADRs reveals how they are related and draws attention to the common factors involved in the cause of reactions within the same group, thus enabling similar steps to be taken to treat or prevent them. Adverse drug reactions are categorized as Type A, Type B, or Type C in this method of classification.

## Type A (augmented) adverse drug reactions

- These reactions are the result of an exaggerated, but otherwise normal pharmacological action of a drug given in the usual therapeutic doses.
- Type A reactions are largely predictable on the basis of a drug's known pharmacology.
- They are usually dose-dependant and although their incidence and morbidity in the community is often high, their mortality is generally low.

## Type B (bizarre) adverse drug reactions

- These reactions are totally aberrant effects that are not expected from the known pharmacological actions of a drug when given in the usual therapeutic doses to a patient whose body handles the drug in a normal way.
- They are usually unpredictable and are not observed during conventional pharmacological and toxicological screening programs.
- Although their incidence and morbidity are low, their mortality may be high.

## Type C adverse drug reactions

- These reactions refer to situations where the use of a drug, often for unknown reasons, increases the frequency of a "spontaneous" disease.
- They may be both serious and common and may have pronounced effects on public health.
- They may also be coincidental and often concern long-term effects. There is often no suggestive time relationship and the connection may be very difficult to prove.