Our webinar will begin shortly

Happy
Canadian Patient Safety Week
2019

### Canadian Patient Safety Week



# Canadian Patient Safety Week Webinar: Mandatory Reporting of Serious Adverse Drug Reactions And Medical Device Incidents

**November 1, 2019** 

ConquerSilence.ca





Mr. Christopher Thrall

Canadian Patient Safety Institute
Communications Officer





A huge thank you to GOJO Industries, Inc. and HealthPRO for sponsoring CPSW this year!



### **Today's Speakers**



Mr. Marc Mes

MHPD Director General,

Health Canada

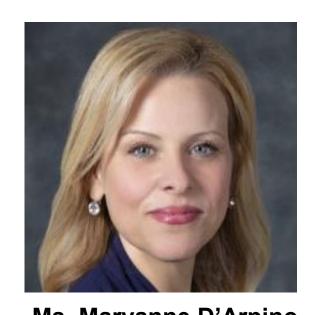


Ms. Maryann Murray

Patient Advocate,

Patients for Patients Safety

Canada



Ms. Maryanne D'Arpino

CPSI Senior Director,

Patient Safety Improvement and Capability Building

### **Today's Speakers (continued)**



Ambika Sharma

Medication Safety Specialist,

ISMP Canada



Sylvia Hyland

VP Operations and Privacy

Officer,

ISMP Canada



Nancy Louis

Manager, Medication Quality &
Safety

Alberta Health Services



Holly Myer

Provincial Director, AHS
Product Quality & Safety

Alberta Health
Services



Patient safety incidents are the third leading cause of death in Canada, behind cancer and heart disease.



Patient S

Today in Canada every 17 minutes someone dies in a hospital from an adverse event.



Let's #ConquerSilence in healthcare together. It's time to speak up.

- Your inner voice can save lives.
- This campaign should move you to speak.
- Death is no match for your voice.



# **Learning Outcomes**

### Participation in this presentation will enable you to:

- Understand mandatory reporting of serious ADRs and MDIs in the context of patient safety
- Describe the regulatory requirements for mandatory reporting of serious ADRs and 2. MDIs by hospitals
- 3. Identify strategies and systems to support mandatory reporting of serious ADRs and **MDIs**

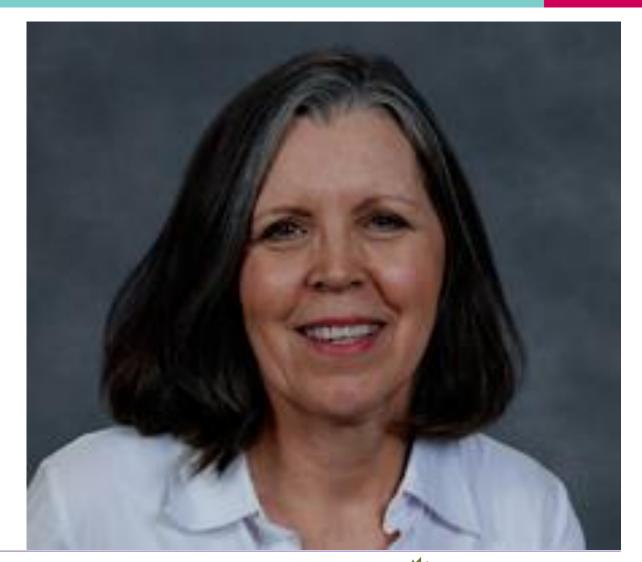
# Mr. Marc Mes

MHPD Director General Health Canada



# **Maryann Murray**

Patients for Patient Safety Canada



# Purpose of Vanessa's Law

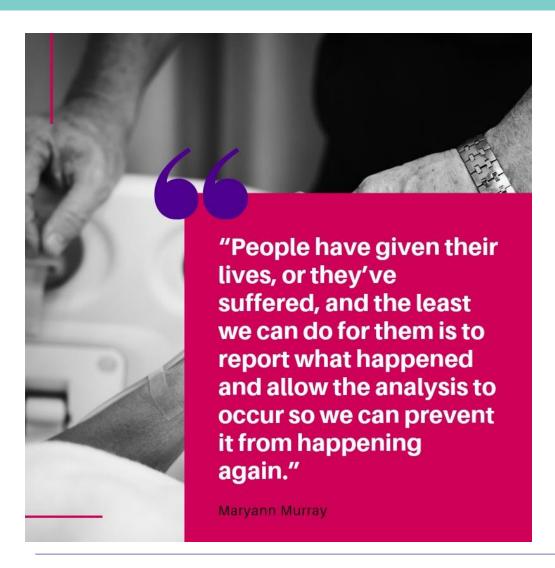
# The Protecting Canadians from Unsafe Drugs Act (Vanessa's Law) introduces amendments to the Food and Drugs Act to improve Health Canada's ability to:

### Who was Vanessa?

Vanessa's Law was enacted in 2014 and the mandatory reporting requirements come into effect December 16th, 2019.



### Patients for Patient Safety Canada: Importance of Public Awareness



- Patients for Patient Safety
   Canada members are
   world leaders in patient
   safety improvement initiatives
- An active member of PFPSC, Maryann Murray, lost her daughter, Martha Murray, to an adverse drug reaction when Martha was 22 years old



### We All Have a Role in Safety



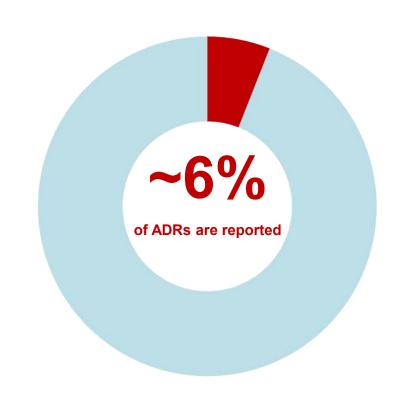
# Maryanne D'Arpino

Senior Director, Canadian Patient Safety Institute (CPSI)



### Why Is Mandatory Reporting of Serious ADRs and MDIs Important?

Health Canada is continuously looking for ways to strengthen its knowledge base on product safety in the interest of improving patient outcomes and public health.





### What Are the Benefits of Serious ADR and MDI Reporting?

### **Serious ADR and MDI Reporting Contributes to:**

### **IDENTIFICATION**

of emerging safety issues related to drugs and medical devices

### **ASSESSMENT**

of harm vs. benefit of drugs and medical devices

### **SHARING**

of learning, including warnings and advisories for health care providers, patients, and stakeholders

### **IMPROVEMENT**

of safety of products through risk mitigation such as a labelling change, a product information update, or a recall

## **Ambika Sharma** Medication Safety Specialist



Institute for Safe Medication Practices Canada 4711 Yonge Street, Suite 501 Toronto ON M2N 6K8

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The educational materials provide core content about serious adverse drug reaction (serious ADR) and medical device incident (MDI) reporting

There are 4 PowerPoint modules:

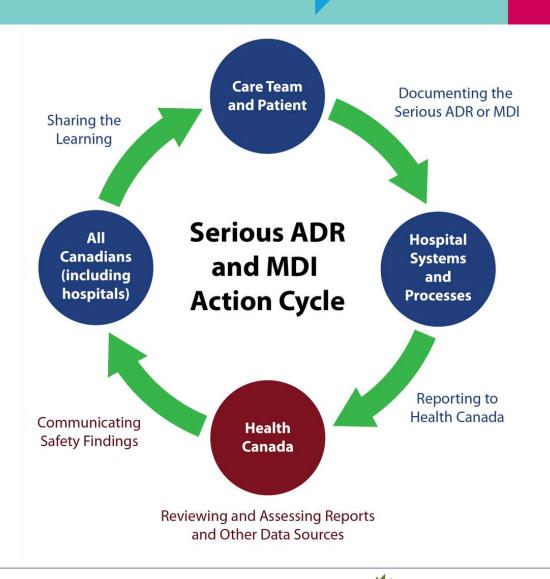
- **Module 1** Overview of Vanessa's Law and Reporting Requirements
- **Module 2** Reporting Processes to Health Canada
- **Module 3** Strategies to Promote and Support Mandatory Reporting
- **Module 4** Health Canada's Review and Communication of Safety Findings

More information is available from:

https://www.patientsafetyinstitute.ca/en/toolsResources/Vanessas-Law/Pages/default.aspx



# **Conceptual Model of Serious ADR and MDI Reporting by Hospitals**



# Regulations for Mandatory Reporting

### Who Is Required to Report?

The regulations apply to all hospitals.

The regulations define a **hospital** as a facility that:

- is licensed, approved or designated as a hospital by a province or territory, in accordance with the laws of the province or territory, to provide care or treatment to persons suffering from any form of disease or illness; or
- is operated by the Government of Canada and provides health services to in-patients.

### Notes:

- Outpatient clinics are subject to the regulations if they are legally part of the hospital, even if they are physically separate from the hospital. On the other hand, clinics that may be physically located within a hospital, but that are not legally part of the hospital, will not be subject to the regulations.
- Health care institutions that are outside the scope of the definition of hospitals, such as private clinics or long-term care facilities (e.g., nursing homes), continue to be encouraged to report on a voluntary basis.



### What are the Definitions of a Serious ADR and MDI?

A serious adverse drug reaction (serious ADR) is a noxious and unintended response to a drug that occurs at any dose and that

- requires in-patient hospitalization or prolongation of existing hospitalization,
- causes congenital malformation,
- results in persistent or significant disability or incapacity,
- is life-threatening, or
- results in death.

A *medical device incident (MDI)* is an incident related to a failure of a medical device or a deterioration in its effectiveness, or any inadequacy in its labelling or in its directions for use that has led to the death or a serious deterioration in the state of health of a patient, user, or other person, or could do so were it to recur.

Note: Hospitals are not required to establish causality; the information to be submitted by the hospital to Health Canada only needs to represent the suspicions of a health care professional that a serious ADR or MDI has been observed.



### What Products Are In Scope of these Regulations?

The mandatory reporting requirements for hospitals apply to therapeutic products, including:

- Pharmaceuticals (prescription and non-prescription drugs)
- Biologic drugs (biotechnology products, fractionated blood products, plasma proteins, and vaccines [excluding vaccines administered under a routine immunization program of a province or territory])
- Radiopharmaceutical drugs
- Disinfectants
- Medical devices
- Drugs for an urgent public health need

When in doubt, Health Canada encourages hospitals to report.



The term **medical device** covers a wide range of health and/or medical instruments used in the treatment, mitigation, diagnosis or prevention of a disease or abnormal physical condition.

Medical devices are classified into **Class I** (lowest risk) to **Class IV** (highest risk). Examples are:

- Class I hospital beds, wheelchairs, leg prostheses
- Class II infusion sets, syringes, tracheostomy tubes, urethral catheters
- Class III infusion pumps, anesthesia gas machines, intrauterine devices
- Class IV pacemakers, defibrillators, breast implants, bone grafts

All classes of medical devices are included in mandatory reporting by hospitals.



Class I (Hospital bed)



Class IV (Defibrillator)



### When Must Hospitals Report?

The regulations require hospitals to report serious ADRs or MDIs in writing to Health Canada within 30 calendar days of first documentation of the serious ADR or MDI within the hospital.

### Information "Within the Control of the Hospital"

The regulations require hospitals to report all documented serious ADRs and all documented MDIs, where the required information is within the control of the hospital.

- Information that is within the control of the hospital is information that would be reasonably accessible within the hospital.
- While it is encouraged for hospitals to take all reasonable steps to retrieve the required information to complete as thorough a report as possible, there is no requirement to do further investigation in order to obtain the pieces of information.

Examples of serious ADR or MDI documentation within the hospital include:

- a serious ADR or MDI that is identified in a patient's clinical/medical record;
- a serious ADR or MDI that is identified in a separate report form (electronic or hard copy) that has been completed by a health care professional; and
- a serious ADR or MDI that has been documented in an ADR form or a product complaint form (e.g., an MDI form) as per internal hospital policy, a pathology report, an incident/patient safety learning database, or a computerized prescription recording system.

### Serious ADR and MDI Reports to Health Canada

- Health Canada remains flexible and is able to receive reports in various formats via multiple secure submission methods, recognizing that hospital systems vary.
  - If interested in submitting reports electronically to Health Canada, please email the Canada Vigilance Program at <a href="https://hc.canada.vigilance.sc@canada.ca">hc.canada.vigilance.sc@canada.ca</a>.
  - Health Canada supports report submissions using a secure File Transfer Protocol (sFTP) and continues to explore system-to-system options.
- The reporting forms for serious ADRs and MDIs, together with instructions, are available on the Health Canada website:
  - Serious ADR reporting form: <a href="https://www.canada.ca/content/dam/hc-sc/documents/services/drugs-">https://www.canada.ca/content/dam/hc-sc/documents/services/drugs-</a> health-products/medeffect-canada/adverse-reaction-reporting/mandatory-reporting-hospital-drug-eng.pdf
  - MDI reporting form: https://www.canada.ca/content/dam/hc-sc/documents/services/drugs-healthproducts/medeffect-canada/adverse-reaction-reporting/mandatory-reporting-hospital-device-eng.pdf



### **New Form for Mandatory Reporting of Serious ADRs**



	- 190 mm mm		14577 13576	Form for Hospitals	
Health Santé	g Form for Hospitals		or Hospitals	) Form for Hospitals	
Canada Canada Protected "B" When Completed	n?* 2. Reaction star	rt date* 3. Reaction end date*	timal to the reaction* (e.g. prescription and non-prescription drugs, medical devices, natural	Serious Adverse I	Drug Reaction (SADR) Reporting Form for Hospitals
Serious Adverse Drug Reaction Reporting Form for Hospitals Canada Vigilance – Adverse Reaction Reporting Program *- required if this information is in the control of or reasonably accessible by the hospital *- required, but hospital is evement from reporting if this information is unavailable	overed red with sequelae preaction(s)**			is the first one	(DIN) is a unique identifier for all drug products sold in Canada. If the DIN is unknown, biologic drugs including biosimilars can be uniquely identified by providing their Brand Name. Generic drugs can be uniquely identified by providing both the Generic Name and the Manufacturer Name. Please also include the Lot Number if Inown.
Section field instructions can be found at the end of the form. Submission of a report does not constitute an admission that medical personnel or the suspect Section field instructions can be found at the end of the form. Submission of a report does not constitute an admission that medical personnel of the suspect Section field in the submission of the submission of the submission of a report does not constitute an admission that medical personnel of the submission field Privacy Motion. The personal information approvide to Health Caevada is governed in accordance with the Privacy Act. We only called the information health Caevada needs to admission the Caevada registers between Reaction Propriet and Propri			in the previous sections' structured boxes, or related testilab results,	(i.e. initial) or a follow-up port is identified as a the SADR report submitter further to s identification number	D1. Drug Identification Number (DIN)*: Provide the drug identification number of the product the patient took, if available. For drugs accessed under an Urgent Pladie. Health Need, provide the identifying code or number for the number of the providence of the p
where applicable. Personal information may be used to analyze general trends, report to senior management and envaluate related programs and services. Trend and safety state in a set-descrifted from tarm plus communicated by a variety of this communication tools under responses to munifice. A subset of de-identified Canada Vigilance Adverse Reaction Reporting Program data is made publicly available from the Canada Vigilance Adverse Reaction Online Database.			er details you feel would contribute to assessment of the serious	mber should be the s sent to Health Canada.	D2. Identifying Code for Urgent Public Health Need Drugs**: If the drug was imported as part of the Access to Drugs in Exceptional Circumstances, provide the code or number of the drug, if any, assigned in the country in
Other uses or disclosures: Pencoral information may be shared within Health Canada and with the Public Health Agency of Canada, the Canada medication Insideri Reporting and Prevention System Program (managed in partnership with the Canadan midstate on Health Information), he institute to Salar on the Canadan Patters of the Health Information, he institute to Salar on the Institute of Salar on the Institute of Salar on the Institute of Salar on Patters (Salar) in Institute of Salar on the Institute of Salar	rovide the Brand Name or the Proper Name, as we	ing the Manufacturer Name of known		he hospital first	
For more information: This personal information collection is described in Inth Source, available online at <u>information</u> . This personal information bank HC PPU 4177.  Your rights under the Privacy Act. In addition to protecting your personal information the Privacy Act gives you the right to exquest access to, and correction of your personal information. For more information should be receipted, and expended in the Privacy Act gives you are fight to exquest at 418 418-4179 or 418 418-418 4179 or 418 418 418 418 418 418 418 418 418 418	important for traceability of an adverse reaction to a specific suspect product.  2. Identifying Code for Urgent Public Health Need Drugs**			ne number, email e of follow-up. reporting hospital.	provided, or is not specific (e.g. an active ingredient as brand name), please provide the proper name (active ingredients) and the manufacturer name. DS. Strength: Provide the amount of active ingredient per single dosage form of the drug. For example, if the patient took two tablets of a medication,
period fraction and of finds it can be described from the proof of finds and the proof of f	4. Common/Prope	er Name** (active ingredient)		ue hospital identifier as	please provide the strength of only one tablet. Strength is defined as the amount of an active ingredient that the product contains.  D6. Dose: Indicate the amount of the product taken by the patient per the
1. Type of Report*  Initial Follow-up 2. Health Canada (HC) Reference No.: (## follow-up reports only)	6. Dose	7. Frequency		ler, please contact Is do not need to be	dosing regimen. Dose is normally expressed as a quantity.  D7. Frequency: Indicate how often the dose was taken by the patient.  Shorthand text, such as b.i.d., is acceptable in this field.  D8. Route of administration: Provide the means by which the drug entered the
Organization File No.     A. Date report submitted     Documentation Date*  5. Documentation Date*	9. Product start date*  12. Lot No.	10. Product end date*		ry in which the hospital	patient's body. The top five most common routes of administration are at the top of the dropdown list.  9- Product start date: Indicate the date on which the patient started using
6.a. Organization Contact First Name* 7.a. Phone No.* ext		13. Expiry date		ital. nakes the report a elected. Enter the date	the product. If the exact date is not known, partial dates are acceptable.  D10. Product end date*: Indicate the date the patient stopped using the product, if applicable. Please only enter data in this field if it is known that the
b. Last Name*  c. Fax	?* Yes No 16. Did the reaction Yes No 1	V/A return with reintroduction of the product?		readily locate the case	patient stopped taking the product. Partial dates are acceptable.  11. Indication: Enter the therapeutic reason for use.  12. Lot No.: If known, indicate the lot number(s) of the suspect product.  13. Expiry date: If known, indicate the expiry date.  14. Manufacture Details': Indicate the manufacturer name of the suspect
8. Organization Name*	Yes No	an being administered?		he patient.	product and if the adverse reaction details were also provided to the manufacturer. If so, please also provide the date on which the case was
9. Source of report (profession)  10. HC Institutional ID (If It provided, no need to provide address)	provide the Brand Name or the Proper Name, as we important for traceability of an adverse reaction to a sp			e reaction.	D15. Reaction stopped if dose was reduced or removed: Indicate if the adverse reaction stopped after the suspect product was discontinued or the dose
11. Address 12. City 13. Province/Territory 14. Postal Code	2. Identifying Cod	e for Urgent Public Health Need Drugs**		: If available, provide own conditions. nt is known to have	was reduced.  D16. Reaction returned with reintroduction: Indicate if the adverse reaction reappeared after the suspect product was reintroduced.
15. Reason for seriousness* (equation (g) in section F)  (a) Death (yyyyimmidd) (b) Life-threatening (c) Caused disability (d) Admitted to hospital	4. Common/Prope	er Name** (active ingredient)		ntal components, etc.	Product still administered: Indicate if the product is still being administered.      Concomitant therapeutic product(s)
(e) Lengthened hospital stay (f) Congenital malformation (g) Required medical intervention to avoid any of (a) to (f)	6. Dose	7. Frequency		ADR. f the SADR. Partial dates	
Patient ID (e.g. initials, record no.)      Mnown medical conditions and refevant lifestyle factors* (e.g. hepatic and/or renal impairment, diabetes mellitus, current pregnancy, tobacco, connable or alcohol use, recreational drug use, etc.)	Product start date*	10. Product end date*		SADR if applicable. Do al dates are acceptable. **: List the serious	concomitantly) the reaction occurred. Information related to therapy of these products is not required but encouraged. Do not include health products used to treat the reaction.
2.*Sex** 3. Age**	12. Lot No.	13. Expiry date		nced. Please try to avoid	F. Additional Information F1. This section can be used to provide a narrative summary of the serious
"initirace is a term used for a variety of condistria in which a personal born with a reproductive anatomy float does not fit that typical definitions of fermier or male 4. Height 5. Weight 7. Known allergies" (a.g. food, drugs, environmental, etc.; provide details)  4. Height 5. Weight om or kg or	Yes   No   No   No   No   No   No   No   N	return with reintroduction of the product?		form. Attach additional r the reported SADR. r traceability of an t Identification number	adverse drug reaction, additional information on the underlying diagnosis that is pertinent to the reaction, or information that did not fit in the structured fields that could help to determine why the reaction occurred. For serious cases involving death, this section can also be utilized to provide details on the official cause of death and autopsy results.
fn  bsoz   Canada	Yes No			, sentinguoi maille	For more details, refer to the Guidance Document for hospitals at https://www.canada.ca/en/health-canada/services/drugs-health-products/ medeffect-canada/adverse-reaction-reporting/mandatory-hospital- reporting/drugs-devices.html
Canada		2019/06/04	2019/06/04		2019/06/04

### **New Form for Mandatory Reporting of MDIs**

Health Santé Canada Canada		g of the person, medical directive/theraples, or		port Form for Health Care Professionals
Medical Device Problem Report Form for Health Care Professionals			rrors, incompatible with other devices/accessories, expired devices, issues with operator/reason for	rice Information
Canada Vigilance - Medical Device Problem Reporting Program  Protected 'B' When Completed			pection date.	e Name**: Provide the name of the device as per the product label, or
Fields represented by asterisks "indicate that they should be pro- reasonably accessible by the hospital." = required, but hospital is	wided in the case of Mandatory Reports by Hospitals if the information is in control or s exempt from reporting if this information is unavailable. Specific field instructions not constitute an admission that medical personnel or the medical device caused or			nation that can uniquely identify the device from others. You must be either Device Name or Device identifier as essential information.   • Model: Enter the model of the device as per the product label, or lation that can uniquely identify the device from others.  • identifier*: Enter the device identifier found on the label or
Privacy Notice: The personal information you provide to Health Canada the Medical Device Problem Reporting Program authorized by the Depart Devices Regulations, Section(s) 59 (1) (a) (b) (2), 60, 61.1 (1), 62, 63, 64.	s governed in accordance with the Privacy Act. We only collect the information we need to administer near of Health Act, Section 4(N), and the Food and Drugs Act, Section 23 (1) (c) and the Medical 55, 77, 81(k), (v) (2) and 88 (c).	3. Device identifier**	MANAGEM CANAGE AND	nation that can uniquely identify the device from others, such as a bar or GTIN. You must provide either Device Name or Device Identifier as tial information.  No.*: Enter the serial number of the device per the label.
Purpose of collection: We require your information to assess the nature of the report and to fulfill the Health Products and Food Branch (HPFB) program's responsibilities for monitoring the use of medical devices in Canada. Personal information regarding the Submitte, collected from the medical device problem reports, may be used to combut to biological devices profit or monitor the safety and efficacy or information regarding the Submitte, collected from the medical devices profit or monitor the safety and efficacy information to recompliance and enforcement activities or monitor the safety and efficacy information from the manufacturers, health care professionals? practicioners, "facilities and other users of marketed medical devices for the purpose of post-market surveitance of medical devices, to tops of to sarine management, or to complete a hard analysis." Trend and safety cital is a de-Surfettin format may be contracted by a variety of risk		7. Software and version	n which country did 5. Location of the incident occur?	No. "Enter the serial number of the device per the label. Spue No." Provide the catalogue number of the device. atch No.": Provide the lot, control, and/or batch number of the device. are and Version: Provide the software and version number. to Device identifier (UDI) Provide the UDI assigned to medical devices by
of medical devices, to report to senior management, or to complete a tren communication tools (including a monthly Health Canada newsletter – Info	d analysis. Trend and safety data in a de-dentified format may be communicated by a variety of risk watch – and an incident database/data extracts) and / or responses to inquiries.	piry date 13. Age of device	ersons/patients/staff involved)	anufacturer of the device.
Other uses or disclosures: Your personal information may also be provided to the Manufacturer/Importer of the device in the event that they require follow-up of a medical device incident. In limited and specific situations, your personal information may be disclosed without your consent in accordance with subsection 8 (2) of the Privacy Act.		me		and End of Use dates/Duration: Provide the time frame details for use.  date: Provide the expiry date of the device per the label.
not resolved through this cooperative, staged approach, Health Canada or to seek an injunction under section 21.5 of the Act, to compet a Reporter to		etaler/suppler) eport to the vendor? Yes No		f device: Provide the age of the device.  facturer Details*: Indicate the name of the medical device manufacturer the incident details were also provided to the manufacturer. If so, please rovide the date that it was reported to the manufacturer and the
For more information: This personal information collected is described in 415.	n Info Source, evaluable online at infosource gc.cs. Refer to the personal information bank, HC PPU	.(if known)		nce number if known.
Your rights under the Privacy Act in addition to protecting your personal information, the Privacy Act gives you the right to request access to and correction of your personal information. For more information about these rights, or about our privacy practices, please contact the Privacy Constitution at 813-846-3176 or the privacy-to-privacy engineers engineers engineers engineers and used how the right for this wour personal information has been		lable Yes No		or Details: Indicate the same information as above, but for a report led to the vendor of the medical device. he device returned to the manufacturer? Indicate if the device was led to the manufacturer and, if so, provide the date returned. If not,
handled improperty		d. Date explanted e. Duration of implant		te if it is available for assessment.
A. Report and Submitter Information	2 Martin Canada (MC)			ntation details: Provide implantation details if applicable. nore than one of this device involved? Select Yes/No if there were
Type of report* Initial Follow-up	Health Canada (HC)     Reference No. (tor follow-up reports)	vice		oles of the same device used in this particular incident. I.e. Three out of en pads were used in the procedure (ten were defective, three were
Internal submitter file No.	Date report submitted     Documentation / awareness date*	Other		en pads were used in the procedure (ten were defective, three were ile for use).
7.a. Submitter first name*	8. a. Contact phone* ext c. Fax	e errors, incompatible with other devices/accessories, n), expired devices, issues with operator/reason for inspection date.		of Device: Select those that apply.  tial Device/Use Contributing Factors*: Please provide any pertinent details that may have had an impact on the incident.
b. Submitter last name*	b. Contact email		9	ident Information
Organization name*	10°. a. Report Type b. ITA Authorization No. or SAP reference No.		vice, discontinued use of device, treatment of elines.)	of incident: Provide the date of the medical device incident.  e of report: Select the complainant who contacted the submitter to n them about the incident.
11. Profession 12. Department	ent 13. HC Institutional ID ornés unique number is provided, address details do not need to be completed.)	ed, list other devices in Section F)	V 30000	his a recurring issue? Select Yes/No to indicate if this type of incident has red previously in your organization. b. If so, how many times? Indicate the nt of times it has occurred.
14. Address 15. City	16. Province/Territory 17. Postal code	Device identifier**	on site servicing of device/training of the staff,	ich country did the incident occur? Indicate if the incident occurred in la or not. If Other is selected, please describe the circumstances in the tive D6.
18. Alternate contact		7. Software and version		on of the incident: Select from the list the setting of the incident. nt details**: Provide a detailed description of the incident including nation on what happened in the incident, the outcome of the affected
19. Seriousness of the incident				ns involved if known, device(s) and equipment(s) involved, and other
	nt impairment of a body function e. Unexpected medical or surgical intervention to prevent a. through d.	xpiry date 13. Age of device		mitant therapy involved during the incident.
B. Affected Person	in company to a conf of bottom	me	3	ions Taken
Person's ID     Who was affected?     Vulnerable popul     Other:	cm or kg or	etalectruppler) eport to the vendor? Yes No	Ise the fields in section B, C, and D to guide	contains information about any actions taken as a result of the medical nt. These are not legally required but they provide additional about the incident for Health Canada's consideration. Is taken by hospital: Includes information on any relevant actions taken
8. Consequences to the affected person* (Describe the outcome	ft in Ibs oz eof the incident to the affected person.)	(if known)		hospital or the healthcare professionals to correct the problem or any ntive actions.  It is taken by manufacturer/vendor: Includes information on any relevant
		d. Date explanted e. Duration of implant		is taken by the manufacturer/vendor to investigate or correct the em, if known.
		vice		litional Details
	Canada	Other	(2007)20040000000000000000000000000000000	rction provides space for additional information about affected persons, ther devices involved, or details for the narrative if required.
	Curiada	2019-05-09	2019-05-09	tails, refer to the Guidance Document for hospitals at v.canada.ca/en/health-canada/services/drugs-health-products/ anada/adverse-reaction-reporting/mandatory-hospital-reporting/ es.html

The reporting form for medical device problems was created for multiple reporting uses:

- Mandatory reporting for
  - hospitals,
  - Special Access Program (SAP),
  - Investigational **Testing Authorization** (ITA)
- Voluntary reporting to Canadian Medical **Devices Sentinel** Network (CMDSNet) by participating institutions

### Sylvia Hyland

Vice President Operations and Privacy Officer



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# **Strategies to Support Mandatory Reporting**

Note: Health Canada does not endorse any particular strategy The following examples, in alphabetical order, are provided for information sharing only.



### **Self-Assessment Questions for Hospitals**

The following self-assessment questions may be helpful to identify opportunities to prepare for the implementation of mandatory reporting within your hospital:

- In what way is serious ADR and MDI documentation and reporting promoted?
- Are our hospital policies and procedures aligned with the mandatory reporting requirements?
- Can our hospital systems be leveraged to facilitate documentation and reporting? \
- How can awareness and knowledge of serious ADR and MDI documentation and reporting be improved?
- Has our hospital leadership created an environment that supports serious ADR and MDI documentation and reporting?
- Are patients and families empowered to ask questions and be engaged in monitoring their treatments?
- Is serious ADR and MDI documentation and reporting included in orientation or education programs?
- Is the learning or feedback derived from serious ADR and MDI reports shared with health care providers?



#### Strategic and Operational Considerations for Teams

- Create a multidisciplinary team (e.g., 'Safety Team') to support serious ADR and MDI documentation and reporting, and assist with:
  - identifying serious ADRs and MDIs through proactive monitoring;
  - completing and submitting serious ADR and MDI reports;
  - disseminating learning from serious ADR and MDI reporting;
  - providing coaching and education;
  - enabling continuous quality improvement for serious ADR and MDI reporting processes; and
  - providing regular updates to senior leadership.
- **Identify individual 'Champions'** to help lead serious ADR and MDI reporting efforts and/or provide support for identifying and submitting serious ADR or MDI reports to Health Canada.
- **Identify networking opportunities** to support collaboration and shared commitment to serious ADR and MDI documentation and reporting.



#### **EXAMPLE: Alberta Health Services**

- A centralized provincial approach has been developed for serious ADR reporting and for improved MDI reporting.
  - Provincial Task Force is in place to coordinate the initiative
  - Includes centralized process to receive, review and further report
- Alberta is implementing a province-wide clinical information system
  - All sites will use a single electronic health record
  - There is a phased roll out across the province over five years
  - Serious ADR reporting will be integrated into the electronic health record
  - MDI reporting will be linked from the electronic health record, as well as from the Alberta Health Services intranet



#### **EXAMPLE:** British Columbia

- The BC Patient Safety & Learning System (BCPSLS) has partnered with the BC Ministry of Health, health authorities, and Health Canada to create a provincial strategy for implementing the mandatory reporting requirements.
- The **provincial strategy** includes:
  - the use of an established, province-wide incident reporting system (BCPSLS) to report ADRs and MDIs;
  - a steering committee and working groups to guide and implement the approach; and
  - a communication and education campaign to promote reporting.
- Members of the steering committee and working groups include representatives from BCPSLS, BC Ministry of Health, Health Canada, pharmacy, biomedical engineering, supply chain, and quality, safety and risk.

Labrador

- In Newfoundland and Labrador, the Department of Health and Community Services has partnered with the four regional health authorities in a steering committee to create a provincial strategy for implementing the mandatory reporting requirements.
- The Provincial Steering Committee's mandate includes:
  - establishing the most effective and efficient method for mandatory reporting,
  - promoting interdisciplinary collaboration in mandatory reporting, and
  - implementing an educational approach.
- Team members of the steering committee include representatives from quality, patient safety and risk management, pharmacy services, nursing, physicians, biomedical services, and information technology.











## **EXAMPLE:** Quebec (CHU Sainte-Justine)

- Goal: Collaboration between the pharmacist and medical archivist to lead implementation of mandatory serious ADR reporting.
- A pharmacovigilance coordinator (pharmacist)
  - manages the reporting of serious ADRs to Health Canada, and
  - reviews and disseminates risk communications from Health Canada.
- A medical archivist (i.e., medical records staff) codes serious ADRs from notes in the patient's medical record and sends the information to the Pharmacovigilance Coordinator.

#### Notes:

- A serious ADR may be missed if it is not well documented in the medical record. Providing training to health care providers about documenting ADRs is useful.
- A process to document a serious ADR identified by the medical archivist after discharge is also helpful.



#### Strategic and Operational Considerations for Technology

- Integrate the reporting process into workflow and technology systems to make reporting as effective and efficient as possible.
  - Explore opportunities to incorporate serious ADR and MDI reporting in electronic health record (or electronic medical record) systems
  - Explore opportunities to incorporate serious ADR and/or MDI reporting in electronic incident reporting systems
  - Explore opportunities to use the **pharmacy information system** to record serious ADRs and facilitate reporting to Health Canada

#### Strategic and Operational Considerations for Technology

- To facilitate serious ADR and MDI traceability to a specific product, technology systems and documentation practices may need to accommodate product-specific identifiers:
  - Drug identification number (DIN) for drugs, disinfectants and biologics / biosimilars
  - Device identifier, catalogue number or model name for medical devices
  - Brand name for all health products
  - Manufacturer's name for all health products
- Explore the feasibility of support from a designated team (e.g., health record team, patient safety team, or risk management team) to track serious ADRs and MDIs from the hospital's documentation/coding system(s).

#### **EXAMPLE: Coding Support for Serious ADR and MDI Tracking**

- Facilities across Canada capture administrative, clinical, and demographic information on all hospital stays for reporting to the Canadian Institute for Health Information's (CIHI) Discharge Abstract Database (DAD).
- Upon a patient's discharge, the health record is reviewed and coded, according to national standards, using ICD-10-CA.
  - ICD-10-CA is the enhanced Canadian version of the 10th revision of the *International* Statistical Classification of Diseases and Related Health Problems.
  - ICD-10-CA contains codes for diseases, signs and symptoms, abnormal findings, complaints, social circumstances, and external causes of injury or diseases.
  - ICD-10-CA coding can be leveraged to support serious ADR and MDI tracking.



#### **EXAMPLE: Coding Support for Serious ADR and MDI Tracking**

Adverse effect categories in ICD-10-CA:

Y40-Y59	Adverse effects during therapeutic use of a drug, medicament or biological substance	These external cause codes are assigned when the drug/substance is used as prescribed or intended in therapeutic use.
Y70-Y82	Adverse events with medical devices	These external cause codes are assigned exclusively for <u>unexpected</u> <u>malfunctioning or breakage of a device</u> .

- There are some gaps in what is captured to meet DAD reporting requirements and what is needed to comply with mandatory reporting requirements:
  - CIHI's DAD ICD-10-CA coding does not capture specific drug/device names, therefore this information would need to be obtained from the patient's health record for mandatory reporting.
  - CIHI's DAD ICD-10-CA coding is based on physician\*-documented adverse effects that cause harm.
  - CIHI's DAD ICD-10-CA coding is based on actual events and would not identify potential for serious harm in the case of medical device incidents.

<sup>\*</sup>Mandatory reporting regulations do not require physician confirmation of a serious ADR or MDI.



#### Strategic and Operational Considerations for Education

- Refer to Health Canada's resources:
  - Modules Educational support for mandatory reporting
  - Posters to promote reporting
- Include education about serious ADR and MDI reporting in:
  - orientation programs,
  - student teaching programs and curricula, and
  - continuing education programs.
- **Empower patients and families** to ask questions and be engaged in monitoring their treatments
- Share tips for recognizing a serious ADR or MDI with health care providers
  - Consider if symptoms experienced by the patient might be due to a serious ADR or MDI
- **Develop a process** to regularly share within the hospital (e.g., newsletters, intranet) Health Canada's safety findings related to serious ADRs and MDIs



#### Tips for Recognizing a Serious ADR or MDI

- Serious harm from a drug or from a medical device can be mistaken for a symptom of a disease.
- A high level of suspicion, clinical awareness, and patient dialogue are key components in identifying a serious ADR or MDI. The following can help:
  - Ask about the patient's medical history
  - Consider a serious ADR or MDI if there is:
    - an unexpected change in the patient's clinical condition
    - a new health problem for the patient
    - a need for urgent additional therapies, procedures or surgeries
    - a sudden need for a rescue drug (e.g., naloxone, epinephrine, glucagon)
    - a medical order for an acute change to therapy (e.g., abrupt discontinuation)
- A serious ADR or MDI can occur shortly after beginning treatment or much later



### **Examples of Safety Information Sharing**

Health Canada disseminates findings to health care providers and the public to alert and educate them about identified health risks related to health products.

Multiple sources of safety information are available to provide up-to-date information:

- Adverse Reaction Online Database (https://www.canada.ca/en/healthcanada/services/drugs-health-products/medeffect-canada/adverse-reaction-database.html)
- Medical Device Incidents Database (https://hpr-rps.hres.ca/mdi\_landing.php)
- Annual AR/MDP Trends Report (https://www.canada.ca/en/healthcanada/services/publications/drugs-health-products/annual-trends-adverse-reaction-casereports-health-products-medical-device-problem-incidents.html)
- Health Canada Safety Reviews (https://www.canada.ca/en/healthcanada/services/drugs-health-products/medeffect-canada/safety-reviews.html)
- Health Canada Recalls and Safety Alerts (http://www.healthycanadians.gc.ca/recallalert-rappel-avis/index-eng.php?cat=3)
- Health Product InfoWatch (https://www.canada.ca/en/health-canada/services/drugshealth-products/medeffect-canada/health-product-infowatch.html)
- <u>Drug and Health Product Register (DHPR)</u> (https://hpr-rps.hres.ca/)



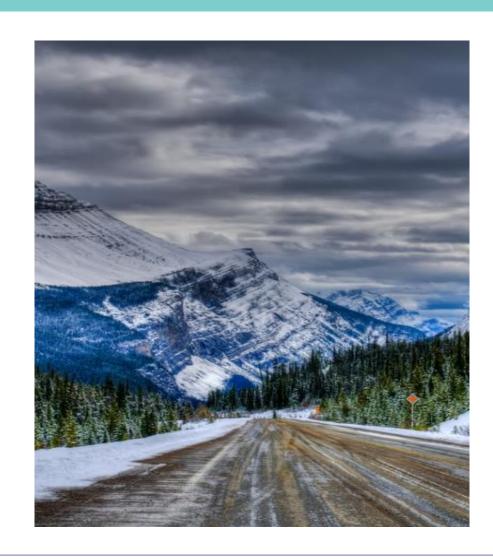
## Alberta Health Services (AHS)



**Nancy Louis** Manager, Medication Quality & Safety Alberta Health Services



**Holly Myer** Provincial Director, AHS Product Quality & Safety Alberta Health Services



# Vanessa's Law The Alberta Approach

#### **Alberta Health Services: Get to Know Us**



#### **HISTORY**



Founded May 2008 Brought together

regional health authorities

and

agencies

Largest, fully-integrated health system in Canada.



#### **BY THE NUMBERS – OUR PEOPLE**





Serving 4.2 million **Albertans** 



8,968 Acute and sub-acute care beds/spaces

# Connect Care Who will we reach?



#### **POPULATION**

86,900 AHS

8,800 Covenant 8,000 Physicians Students 10,000

2,100 Carewest / Capital Care / CLS

#### BEDS

8,940 Total Hospital Acute and Sub-Acute Care

25,323 Total Continuing Care

2,659 Total Addiction and Mental Health

#### **FACILITIES**

#### Community Ambulatory Care

6 Urgent Care Centres

Ambulatory Care Centres

Family Care Clinics

139 Public Health Centres

#### Addiction and Mental Health

39 Addiction

Community Mental Health

Standalone Psychiatric

#### Acute Care

106 Total Designated Hospitals

#### Cancer Care

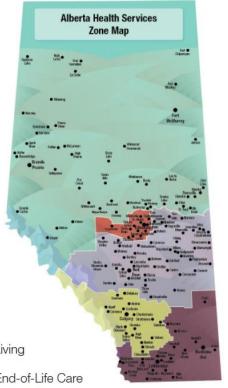
17 Cancer Centres

#### Community-Based Care

331 Long-Term Care and Supportive Living

108 Additional Contracted Care Sites

Community Hospice, Palliative & End-of-Life Care



### **Alberta Approach**

- Centralized provincial approach
  - In development for Serious Adverse Drug Reaction (SADR) reporting
  - Existing process is under improvement for Medical Device Incident or Problem (MDIP) reporting
- AHS Vanessa's Law Task Force
  - Multidisciplinary committee responsible for coordinating the initiative
- Will include a centralized process to receive, review, collate, and submit reports

### **Alberta Approach**

- Communication plan in development
  - Goals: generate awareness, promote understanding of the importance of the legislation, convey the importance of reporting, engage audiences to make the necessary practice changes
  - AHS specific educational resources (e.g. memos, posters, videos, learning module)
  - Landing page on AHS intranet
  - Central email account for questions and follow up

### Alberta Approach

- Alberta is implementing a province wide electronic medical record
  - All sites will use a single electronic health record after a staggered roll out across the province



- Timeline for Epic first site goes live in November 2019
- SADR reporting will be integrated into Epic
- MDI reporting will be linked from within Epic, as well as from the AHS intranet

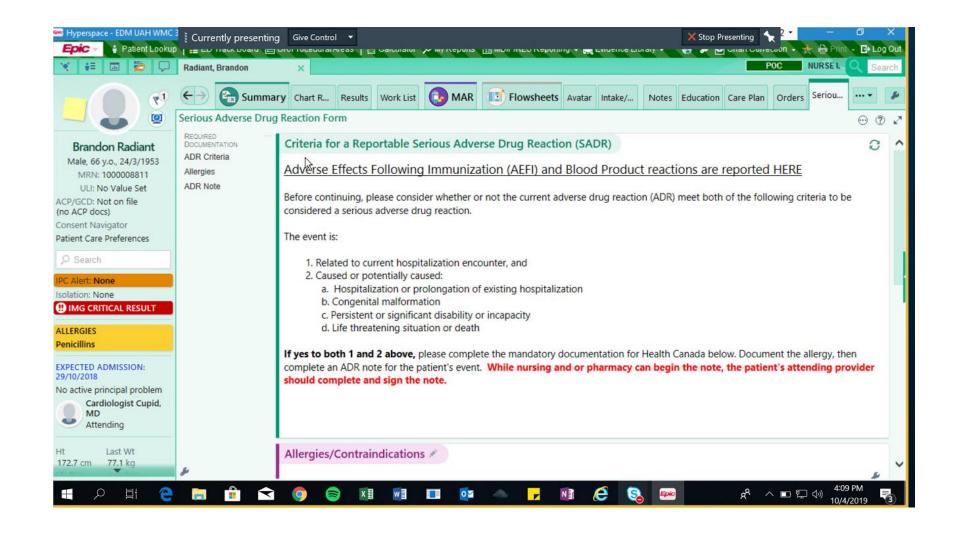
# Sites that have implemented Epic

# SADR reporting functionality will be fully integrated into the electronic health record

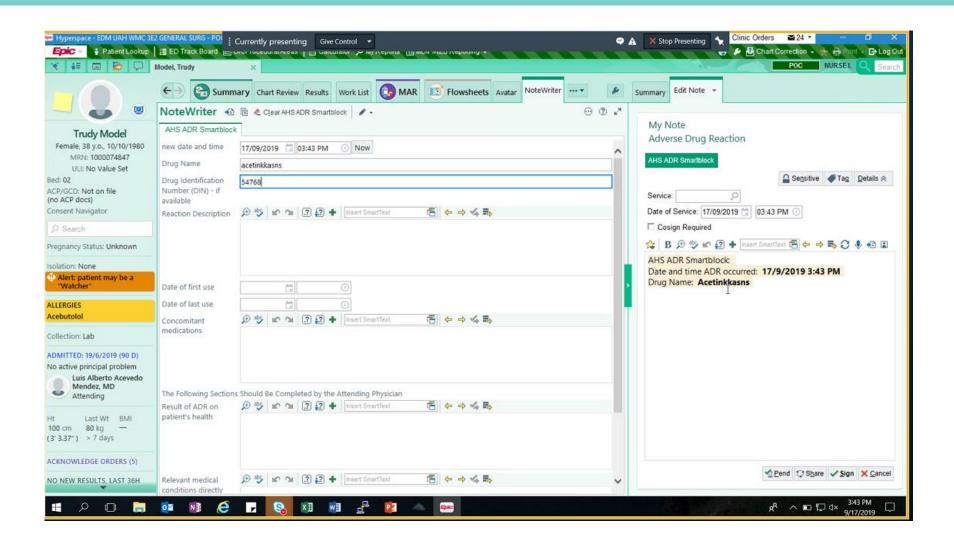
# Sites that have not yet implemented Epic

Existing online reporting system (AHS Reporting and Learning System – RLS) will be used

#### SADR reporting process in Epic



### SADR reporting process in Epic



### **SADR** reporting process in RLS

### Reporting & Learning System for Patient Safety (RLS)



#### SADR reporting process in RLS

\* What was the medication problem? Adverse drug reaction Contraindicated Select the term that best applies to the medication problem and, where Damaged product (e.g. faulty package) possible, best describes what had the Drug or solution incompatible mixture potential to happen or happened to the patient (e.g. patient received an Expired or deteriorated medication / product Selecting these incorrect drug, extra dose, etc.). Extra dose options will open the serious Yes ★ Was the adverse drug reaction serious? adverse drug O No A serious adverse drug reaction is a reaction specific noxious and unintended response to a drug that occurs at any dose and that: questions. requires in-patient hospitalization or prolongation of existing hospitalization; causes congenital malformation, results in persistent or significant disability or incapacity; or is life-threatening or results in death. \* Health Canada - Mandatory reporting of serious adverse drug reactions and medical device incidents by hospitals

#### **MDIP** reporting process - Legacy

# Two Teams – Two Streams 3+ forms, 2 teams, 1 Medical Device Hotline (1-888)

#### "Equipment" Maintained devices

- Incidents (harm) typically reported through RLS
- Problems typically reported by Clinical Engineering via **Equipment Feedback form**

#### "Product" Consumable devices

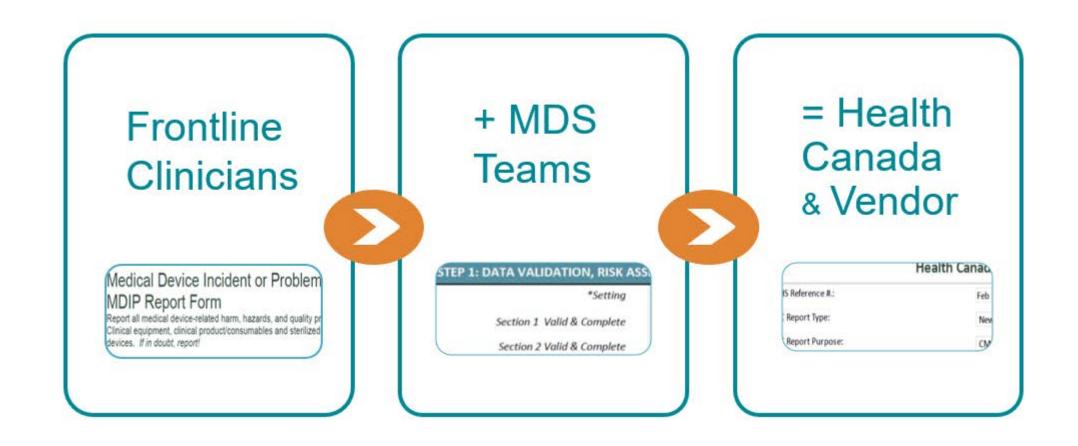
- ~23% reported through RLS
- *Incidents and Problems* typically reported through **Product Feedback form**



# New, Single MDIP Reporting Form (& MDIP Hotline)

- InfoPath Form (eventually stand-alone Datix form)
- Feed into MDS Teams' Sharepoint site
- MDS Teams validate, facilitate, investigate, report

Epic Locations	Non-Epic Locations
Link on every Epic user's 'hyperspace' to MDIP form	Link on intranet to same MDIP form, feeds same SP site



#### Additional proposed supports to MDIP reporting

#### Barcode scanning + UDIs

- Barcode scanning for implants, to start
- UDI eventually required all devices (USFDA & HC we hope)

#### Supply MDIP "Wasted Reason"

- Device problem before or during use
- Cue/double-check that we have not missed MDIP



Do you want to waste all supplies?

Accept

a wasted reason:

Waste All Supplies



Cancel

# Thank you! **Questions?**







A huge thank you to **GOJO Industries**, **Inc.** and **HealthPRO** for sponsoring Canadian Patient Safety Week 2019



# #ConquerSilence



Donate your voice: <a href="https://www.conquersilence.ca">www.conquersilence.ca</a>

Register for upcoming webinars, listen to the podcast and download resources at:

www.patientsafetyweek.ca

**#ConquerSilence Campaign is here to stay** 



### **Acknowledgments**

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More information is available from:

https://www.patientsafetyinstitute.ca/en/toolsResources/Vanessas-Law/Pages/default.aspx





Santé Canada





