



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

GVP Module VIII ICH M14

ENCePP Plenary 2022
Wednesday 30 November 2022

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Legal obligations

Annex III. 1. Format of the study protocol

Set of measures to be applied for implementing the legal obligations

VIII.B.3.1 Format and content of a study protocol

Template with explanations on format and content of each section of PASS protocols submitted by companies

20.6.2012

EN

Official Journal of the European Union

L 159/5

COMMISSION IMPLEMENTING REGULATION (EU) No 520/2012

of 19 June 2012

on the performance of pharmacovigilance activities provided for in Regulation (EC) No 726/2004 of the European Parliament and of the Council and Directive 2001/83/EC of the European Parliament and of the Council



9 October 2017
EMA/813938/2011 Rev 3*



EUROPEAN MEDICINES AGENCY
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Guideline on good pharmacovigilance practices (GVP)
Module VIII – Post-authorisation safety studies (Rev 3)

26 September 2012
EMA/623947/2012
Patient Health Protection

Guidance for the format and content of the protocol of non-interventional post-authorisation safety studies



Revision of GVP Module VIII

- Revision required due to entry into force in Jan 2022 of the **new EC Clinical Trial Regulation**
- What will we do?
 - adapt **definitions** (e.g., clinical study, clinical trial, non-interventional study)
 - explore how to **align** with new/updated **guidelines** and international standards (e.g., EMA guideline on registry-based studies, HARPER)
 - add text about **feasibility** and **selection** of **data source(s)**
 - integrate appendix I and addendum I
 - implement changes based on **experience** of PASS assessors
 - opportunity to amend **templates** for format and content of PASS protocol and report
- Will be subject to **public consultation** (2023 or 2024)



Link with HARPER

- Compatible with legal format and content of GVP Module VIII
- Template can already be used in PASS protocols without change of structure

9.1. **Study design**: recommendation to use study design diagrams

9.2. **Setting**: rationale, context and table for choices relating to selection of time zero, inclusion/exclusion criteria

9.3. **Variables**: structured tables for exposure, outcome, follow-up and covariates, and validation; description of algorithms

9.4. **Data sources**: evaluation of fitness-for purpose of data source

9.7. **Data analysis**: structured table detailing sensitivity analyses

10. **Protection of human subjects**: new considerations based on GDPR – use of anonymised or pseudo-anonymised data sources



ICH M14

*“General principles on planning and designing **pharmacoepidemiological studies** that utilize RWD for **safety** assessment of a medicine”*

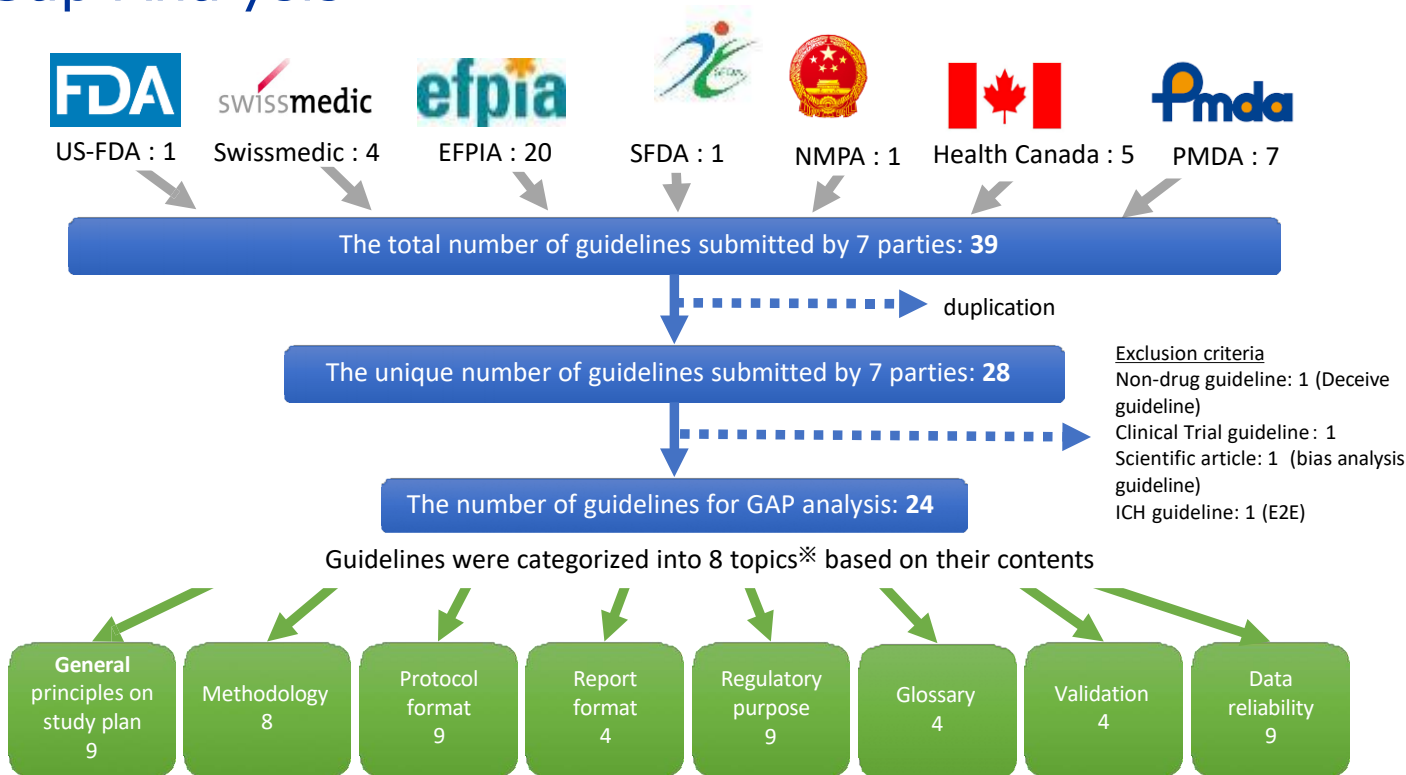


ICH M14 background

- **ICH Reflection paper** on pharmacoepidemiological studies endorsed by ICH Assembly in **June 2019**
 - Harmonise technical and scientific requirements for studies submitted to regulatory agencies
 - Facilitate use of RWD and promote globally-harmonised approach in post-approval safety-related regulatory actions based on most current evidence
- Creation of the **Pharmacoepidemiology Discussion Group** (PEpiDG)
- **Concept paper** recommending establishment of new guideline endorsed in **July 2021**
 - To “*promote faster access of patients to new drugs*”, “*increase confidence in PV activities using RWD*”, “*accelerate rapid accumulation of safety data*”, “*promote sharing of post-marketing safety information among different regulatory agencies, leading to better decision-making*”



PEpiDG Gap Analysis



* Guidelines describing more than one topic are categorized in multiple relevant topics.



ICH M14 background – ctn'd

- ICH M14 Informal Working Group formed in Nov. 2021
- Concept paper endorsed in April 2022
- Working group formalised in May 2022
- Rapporteur: FDA, Regulatory lead: Japan (PMDA)
- Overall aim: to develop harmonized recommendations for post-approval non-interventional studies using RWD on drugs, vaccines and other biologics. Studies with treatment assignment are excluded

1.	INTRODUCTION
1.1	Objectives
1.2	Background
1.3	Scope
2.	GENERAL PRINCIPLES
3.	FIT FOR PURPOSE FRAMEWORK.....
4.	INITIAL DESIGN AND FEASIBILITY
4.1	Research Question.....
4.2	Feasibility Assessments
5.	PROTOCOL DEVELOPMENT
5.1	Data Sources and Data Types
5.1.1	<i>Approaches to Data Collection</i>
5.1.2	<i>Characteristics of Major Data Sources.....</i>
5.1.3	<i>Considerations for Data Source(s) during Feasibility Assessment.....</i>
5.1.4	<i>Data Collection and Data Source Section in the Study Protocol</i>
5.2	Exposures, Outcomes, Covariates
5.2.1	<i>Overview</i>
5.2.2	<i>Exposure</i>
5.2.3	<i>Outcome.....</i>
5.2.4	<i>Covariates.....</i>
5.3	Bias and Confounding
5.3.1	<i>Validation</i>
5.3.2	<i>Target Population</i>

6.	DATA MANAGEMENT
6.1	Study Implementation
6.1.1	<i>Analysis.....</i>
7.	REPORTING AND SUBMISSION
7.1	Safety Reporting
7.2	Regulatory submission formatting and content
8.	DISSEMINATION OF STUDY RESULTS.....
9.	STUDY DOCUMENTATION AND RECORD RETENTION
10.	GLOSSARY
11.	REFERENCES.....

Guideline establishment target date:

January 2025

