

# *In vitro* diagnostics: international regulation, and quality in resource limited settings



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QUAMED -Institute of Tropical Medicine Antwerp

12th July 2017



# 1. Quality of IVDs in low-resource settings: under the radar...

## Laboratory Medicine in Africa: A Barrier to Effective Health Care

Cathy A. Petti,<sup>1,2</sup> Christopher R. Polage,<sup>2</sup> Thomas C. Quinn,<sup>3,4</sup> Allan R. Ronald,<sup>5</sup> and Merle A. Sande<sup>1</sup>

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### Reasons for poor laboratory performance:

- Clinical (mis)diagnosis, distrust and under-use of lab
- Inadequate health care infrastructure
- Lack of trained and competent staff
- Weaknesses of health systems
- Lack of water, power, equipment, procedures
- **Problems with IVDs NOT mentioned!**



IVD quality not mentioned  
No awareness, no data

## But do we need to care about it?

### Reasons for poor laboratory performance:

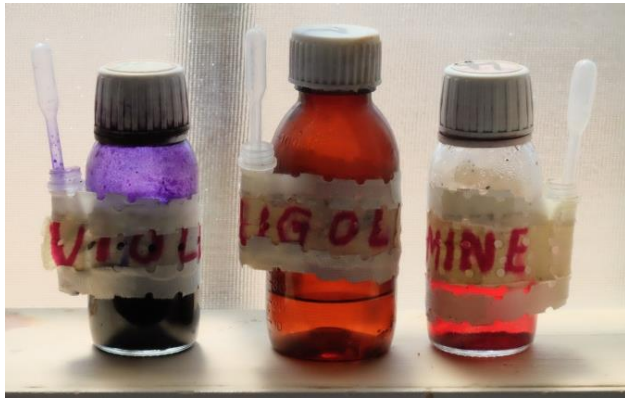
- 60% of errors are preanalytical, 25% postanalytical, only **15% is analytical** Plebani2009, WHO2011
- ! Infrastructure, health systems, staff education,.....

### Three good reasons to care about quality of IVD:

- ! patient care
- ! guidelines, surveillance, algorithms  
malaria, HIV, tuberculosis, antibiotic stewardship...
- ! confidence of professionals/authorities/public



# The role of national reference laboratories ..... example of Benin



## Example on how a reference lab can guide



Wide variation in disk quality  
in 16 selected disks from nine  
manufacturers.

EUCAST Development Laboratory (EDL)  
Växjö  
Sweden

- The disks were chosen either because of their central role in the EUCAST disk testing system (e.g. screening disks for important resistant mechanisms), or **because problems have been detected by the EUCAST Development Laboratory (EDL) or other laboratories.**

23 October 2015

# Side-to-side evaluations of IVDs improve quality over time

Antimicrobial agent	Disk content (µg)	Range <sup>1</sup>	Bio-Rad	Lio-filchem	BD	Abtek	SirScan	Oxoid	HiMedia	Bio-analyse	Mast
Benzylpenicillin	1 unit	EUCAST			L		H		NA	H	
Amoxicillin-clavulanic acid	20-10	EUCAST/CLSI	H			L			H		
Piperacillin-tazobactam	30-6	EUCAST				L	H		NA		
Oxacillin	1	EUCAST		L	L		L		H	L	
Mecillinam	10	EUCAST/CLSI				L	H		H	H	
Cefotaxime <sup>2</sup>	5	EUCAST				NA			NA		
Cefoxitin <sup>3</sup>	30	EUCAST	H*	H		NA			L*		
Ceftazidime	10	EUCAST				L			L		
Meropenem <sup>3</sup>	10	EUCAST/CLSI	H	H*		L	H	H	H	H	H
Ciprofloxacin <sup>3</sup>	5	EUCAST/CLSI	L		L	L			H		L
Norfloxacin	10	EUCAST/CLSI				L	L		H*		
Pefloxacin	5	EUCAST		L	L	NA	NA		H		
Gentamicin	10	EUCAST/CLSI			H	L	NA		H		
Tobramycin	10	EUCAST/CLSI	NA	H					H*		
Erythromycin	15	EUCAST		L	L	L	L		H	L*	
Tetracycline	30	EUCAST		L	L*	L	L*			L	L

Mean value within ± 1 mm of the target value

Mean value >1 mm but within ± 2 mm of the target value

Mean value >2 mm from target value but still within the QC range

Mean value out of the QC range

NA = Not Available

H = High, mean value >1 mm above target

L = Low, mean value >1 mm below target

\* One or more readings out of QC range

# Risk classification of IVDs

(International Medical Device Regulators Forum, [www.imdrf.com](http://www.imdrf.com))

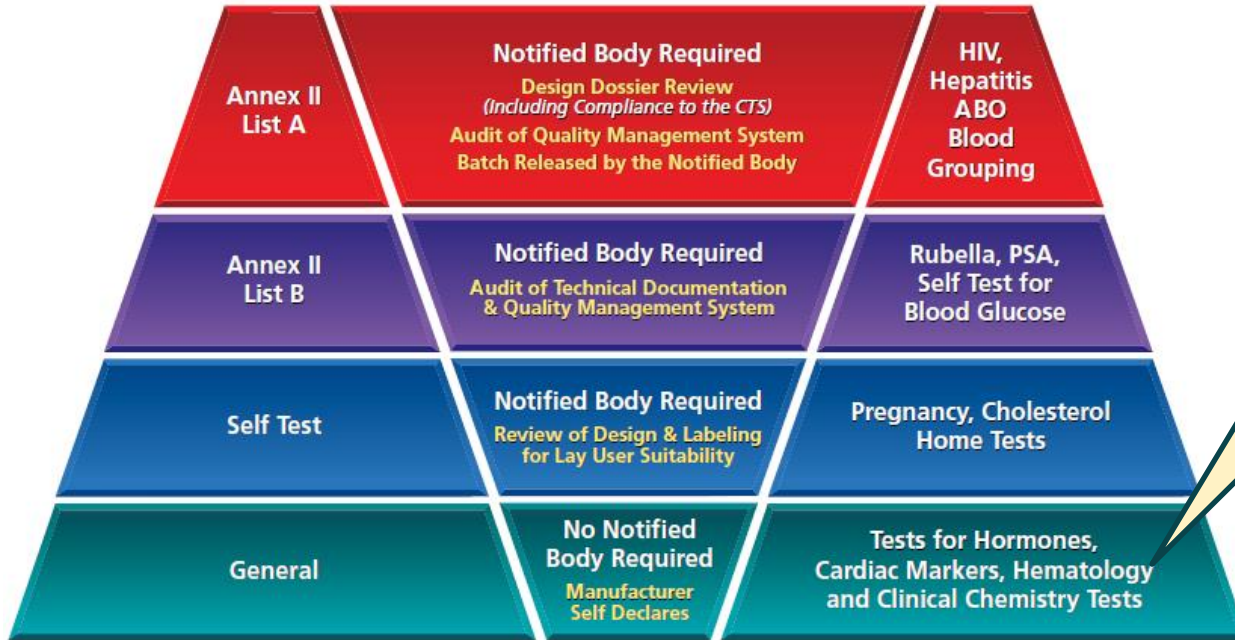
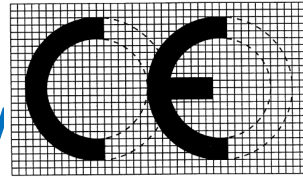
TABLE 1: General classification of IVDD.

Class	Individual risk	Public health risk	Examples
A	•	•	
B	••	•	
C	•••	••	
D	•••	•••	

(•) Low, (••) moderate, and (•••) high.



# CE mark is not always a guarantee for intrinsic quality



Self-declaration of conformity to CE requirements by manufacturer

IVDD Classification

Examples





# Examples: Falsification rare, small-scale, anecdotal (scale, profit margin)

**HX895655**  
100401

**2014/02/20**  
new batch

**1.09204.0502**

**500 ml**

IMO: METHANOL SOLUTION  
ICAO: METHANOL SOLUTION

**IVD** **CE**

C.I. 45380 2,4 g/l  
C.I. 52015 + Azur 4,1 g/l  
1 l = 0,99 kg

Lagern bei +15°C bis 25°C. Lösung stets frisch bereiten. Spezifikation auf Anfrage. Gebrauchsanweisung im Internet/ auf Anfrage.  
Store at +15°C to 25°C. Use only freshly prepared solution. Specification on request. Instructions for use on Internet/ on request.  
Conserver de +15°C à +25°C. N'utiliser que des solutions préparées fraîchement. Spécification sur demande. Mode d'emploi sur Internet/ sur demande.  
Conservarsi tra +15°C e 25°C. Adoperare solo soluzioni preparate di fresco. Specifiche a richiesta. Istruzione per l'uso in Internet/ su richiesta.  
Almacenar de +15°C hasta +25°C. Usar solamente soluciones recién preparadas. Especificación a solicitud. Instrucciones de uso en Internet/ a solicitud.

**Leichtentzündlich**  
Highly flammable  
Facilmente inflamabile  
Facilmente inflamabile  
Facilmente inflamabile

**Giftig**  
Toxic  
Toxic  
Toxic  
Toxic

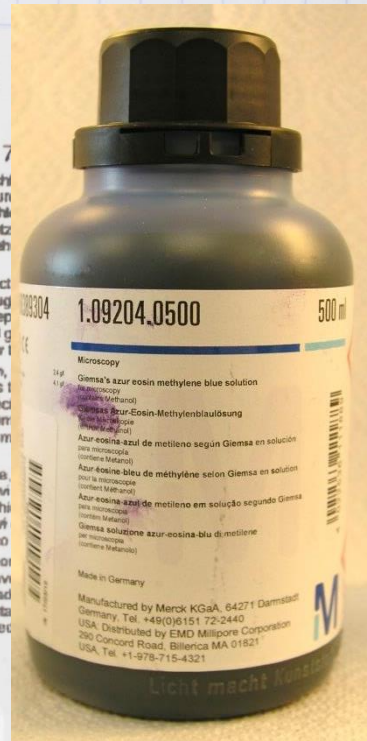
**Microscopy**  
**Giemsas Azur-Eosin-Methylenblaulösung**  
für die Mikroskopie  
(enthält Methanol)  
**Giemsa's azur eosin methylene blue solution**  
for microscopy  
(contains methanol)  
**Azur-éosine-bleu de méthylène selon Giemsa en solution**  
pour la microscopie  
(contient méthanol)  
**Giemsa soluzione azur-eosina-bleu di metilene**  
per microscopia  
(contiene Metanolo)  
**Azur-eosina-azul de metileno según Giemsa en solución**  
para microscopia  
(contiene Metanol)

**Merck KGaA**  
64271 Darmstadt, Germany  
Tel. +49(0)6151 72-2440  
www.merck.de

**4 022536 111889**

**MERCK**

R: 11-23/24/25-39/23/24/25 S: 7  
Leichtentzündlich. Giftig beim Einatmen, Verschlucken. Gefahr irreversiblen Schadens durch und durch Verschlucken. \* Behälter dicht geschlo-  
- Nicht rauchen. Bei der Arbeit geeignete Schutz-  
Bei Unfall oder Unwohlsein sofort Arzt hinzuziehen  
vorzeigen).  
Highly flammable. Toxic by inhalation, in contact  
danger of very serious irreversible effects through  
swallowed. \* Keep container tightly closed. Keep  
smoking. Wear suitable protective clothing and g  
unwell, seek medical advice immediately (show I  
Facilmente inflamabile. Tóxico por inhalación, in  
gestión. Tóxico: peligro de efectos irreversibles t  
avec la peau et par ingestion. \* Conserver le réc  
toute flamme ou source d'étincelles - Ne pas fum  
des gants appropriés. En cas d'accident ou de m  
medecin (si possible lui montrer l'étiquette).  
Facilmente inflamabile. Tóxico por inhalación, p  
Tóxico: peligro de efectos irreversibles muy grav  
ingestión. \* Manténgase el recipiente bien cerrad  
fuente de chispas - No fumar. Usarse indument  
En caso de accidente o malestar, acúdase inme  
muéstresela la etiqueta).



# Examples: Falsification

China has a lucrative market for fake research reagents.  
Nature **2017**; 454: 148-150



- Counterfeit reagents aren't on sale in busy public markets.....
- .... In 2012, researchers in London and Białystok, Poland, reported using an antibody-based kit, called an ELISA, to detect a certain protein in the blood of people with chronic kidney disease.
- But when kidney-disease specialist Herbert Lin of Massachusetts General Hospital in Boston purchased the same kit — branded as a product of USCN Life Science in Wuhan, China — and subjected it to rigorous testing, he found that it targeted another protein ...

## THE SECRET WAR AGAINST COUNTERFEIT SCIENCE

CHINA HAS A LUCRATIVE MARKET FOR FAKE RESEARCH REAGENTS. NOW SOME SCIENTISTS ARE FIGHTING BACK.

BY DAVID CYRANKO

**I**n 2012, Huang Yong walked into a printing shop in northwestern Beijing and stumbled upon evidence of a treason and widespread criminal enterprise. Huang was just a 36-year-old Chinese biologist, National Institute of Biological Sciences, where he does synthetic biology research. Scouting out a small desktop machine to produce the thousands of labels needed for his experiments, he asked if certain models could print on heat-resistant paper. The shop owner proudly pulled out some samples he had made for customers using the same machine.

Huang was shocked to see names such as Abcam and Cell Signalling Technology on labels that looked exactly like those on vials of expensive antibodies produced by the Western companies. Although the printing shop seemed to be in a shady neighborhood, he Huang is directly convinced what he and a number of his colleagues had long suspected: many of the antibodies sold by Chinese distributors were not what they were supposed to be. Counterfeiters were getting fake and diluted research reagents on the market, and shipping to Zhongguancun, Beijing's premier technology park, was one of the places they were buying machines to make their labels. "I had a suspicion. That convinced us," Huang says.

China is famous for knock-off DVDs, Louis Vuitton bags and Rolex watches. But counterfeit reagents aren't on sale in busy public markets. They are sold through sophisticated websites, mixed in with legitimate supplies, and seized and sold using a network of unwitting partners, such as the Zhongguancun shopkeeper. Even antibody-cloning staff have been implicated in the hidden process that creates counterfeit laboratory products, including basic chemistry reagents, serum for cell culture and standard laboratory test kits. Although the

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# Falsification Immersion oil

## CAAMEKI ASBL

Bâtiment Zone de santé Kisantu N° impôt A1005851 X

Tél. : 0999226791 / 0815998710 - E-mail : caameki@yahoo.fr

Compte Bancaire : -01 101-1003734-49 / USD BCDC LIMETE

### FACTURE

Référence : FC055780

Date : 03/06/14

Mode de règlement : Comptant

Document libellé en : Dollar US

A payer avant le : 03/06/14

Compte : 411CLEXC0

Code : CLEXC

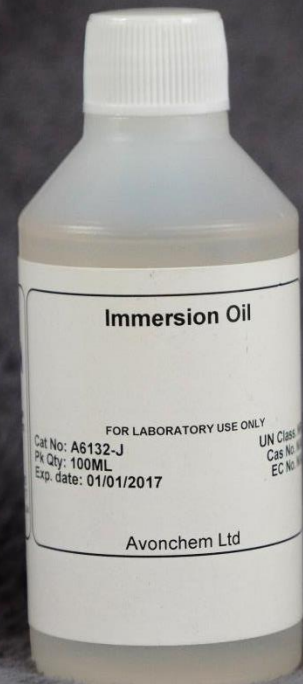
CLIENT EXCEPTIONNEL

KINSHASA

KINSHASA

KINSHASA

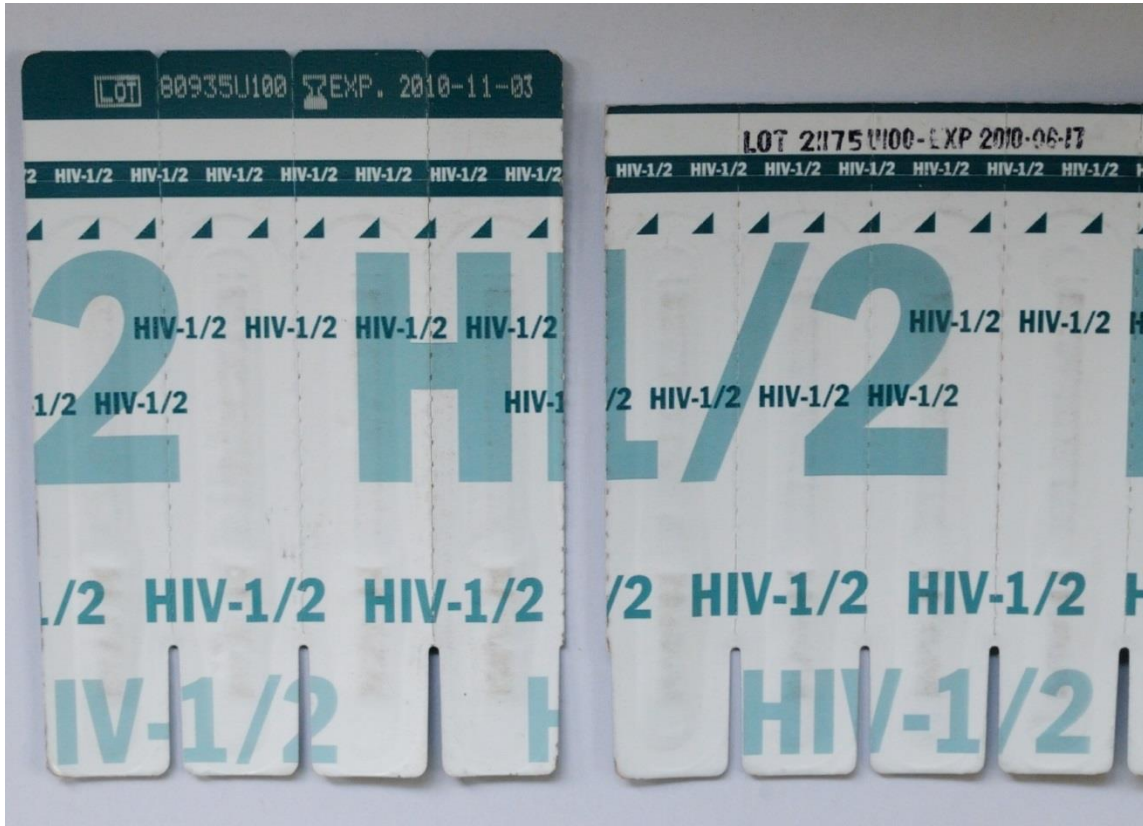
Congo



Référence	Désignation	Unité	Quantité	Prix Unitaire	% Rem.	Montant H.T.
	-Bon de livraison N° BL055456 du 03/06/2014					

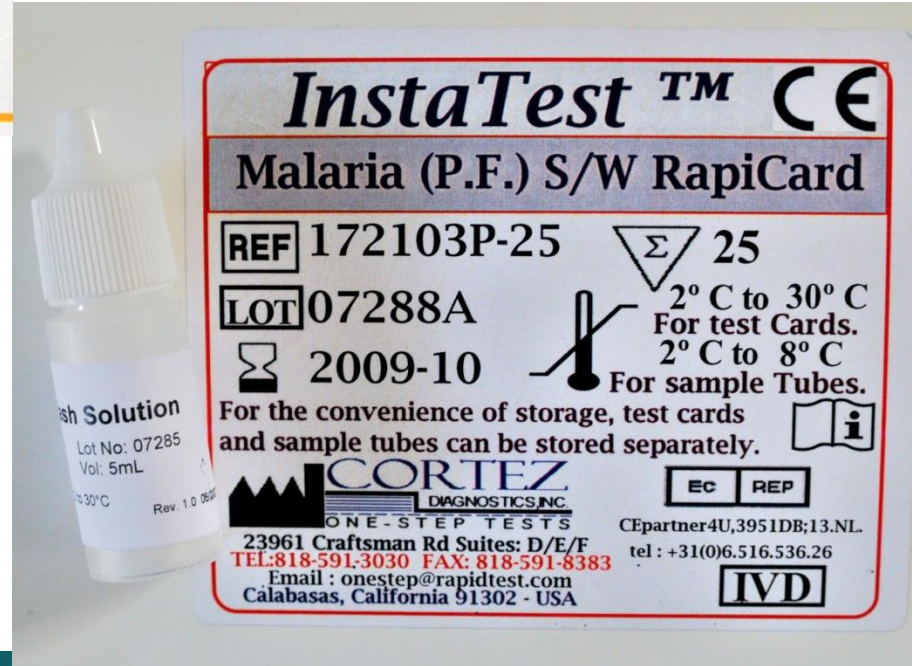
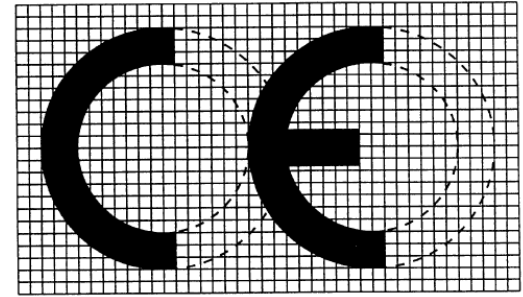
# Falsification

# Tampering /of expiry date



# Falsification – some hints about het CE mark

Symbol outlines  
European Representative  
(address)



# Hints about the CE mark



# Substandards common and large scale



## RESEARCH

## Open Access

### External quality assessment of malaria microscopy in the Democratic Republic of the Congo

Pierre Mukadi<sup>1</sup>, Philippe Gillet<sup>2\*</sup>, Albert Lukuka<sup>1,3</sup>, Ben Atua<sup>3</sup>, Simelo Kahodi<sup>4</sup>, Jean Lokombe<sup>1,5</sup>, Jean-Jacques Muyembe<sup>1,5</sup> and Jan Jacobs<sup>2,6</sup>

Correct dimensions (> 1 cm) and thickness of the film	110 (71.0%)
Complete hemolysis of the red blood cells	118 (76.1%)
No Giemsa stain precipitates observed	60 (38.7%)
Good contrast between nucleus and cytoplasm	70 (45.1%)
Complies with all criteria mentioned above	30 (19.4%)



# Substandards

## Non-tropicalized package

### Note:

### CE mark focuses on the European Community

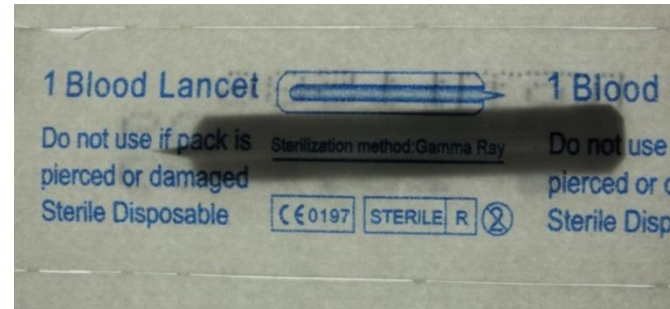
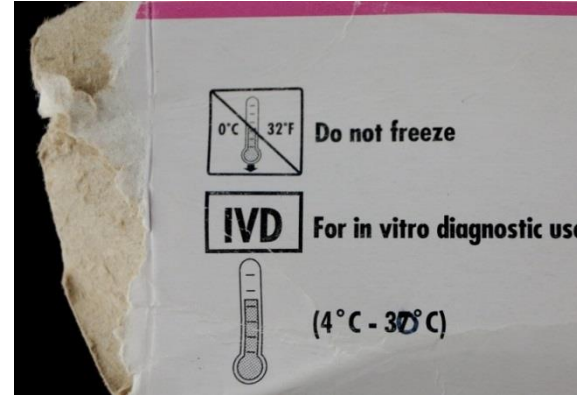
- Climate, infrastructure
- Population assessed
- End-user's level!
- Lab/Clinician's interphase





# Substandards

Pressure on price – volumes – lead times



# Substandards

## Pressure on price – volumes – lead times

Barbé et al. *Malaria Journal* 2012, **11**:326  
<http://www.malariajournal.com/content/11/1/326>



RESEARCH

Open Access

### Assessment of desiccants and their instructions for use in rapid diagnostic tests

Barbara Barbé<sup>1</sup>, Philippe Gillet<sup>1</sup>, Greet Beelaert<sup>2</sup>, Katrien Franssen<sup>2</sup> and Jan Jacobs<sup>1\*</sup>



# Procurement and Supply

## Errors

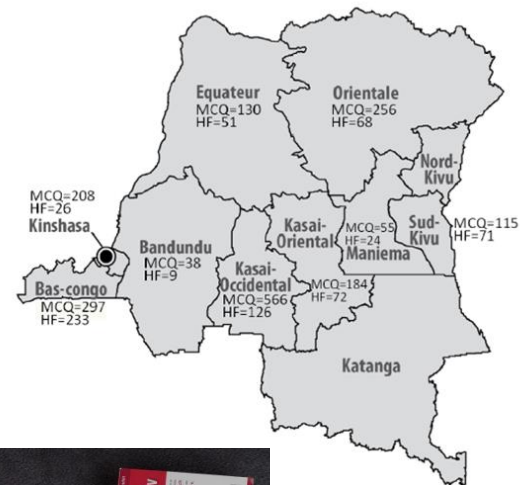
### Product codes too similar

### No alert from the manufacturer

Four different malaria RDT brands were used (not specified for 11.5% of health facilities): (i) Paracheck Pf-Rapid Test (Orchid Biomedical Systems, Goa, India, 77/680, 11.3%); (ii) SD malaria Ag Pf/Pan (394/680, 57.9%) which is the RDT actually recommended by the PNLP; (iii) SD Malaria antigen Pf/Pv (Standard Diagnostics, Inc., Kyonggi-do, Korea, 99/680, 14.6%) and; (iv) SD Malaria antigen Pf (32/680, 4.7%). SD Malaria antigen Pf/Pv exclusively circulated in Kasai Occidental and Sud Kivu where it was used in half of the participating health facilities (respectively 62/126 and 37/71), while in Maniema only Paracheck Pf-Rapid Test was used (22/24).

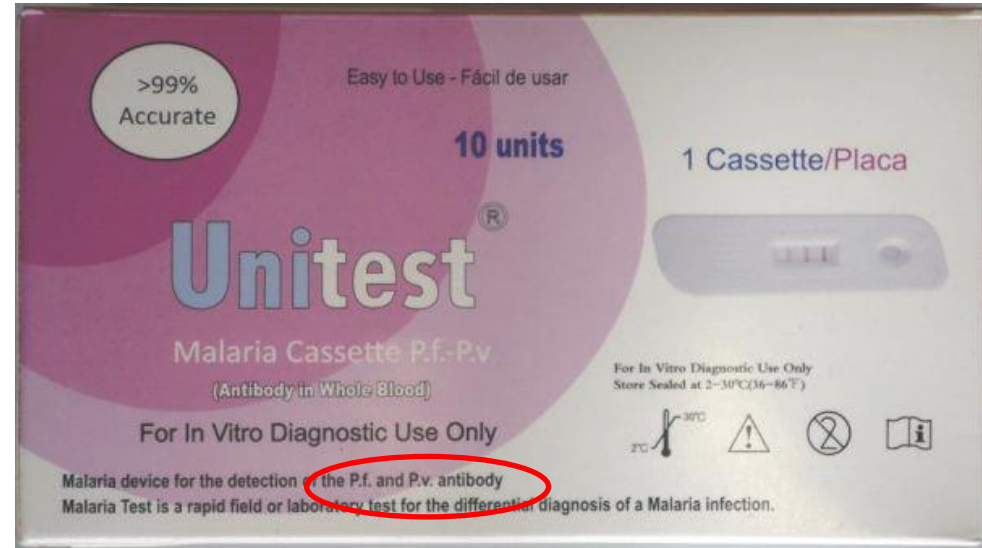
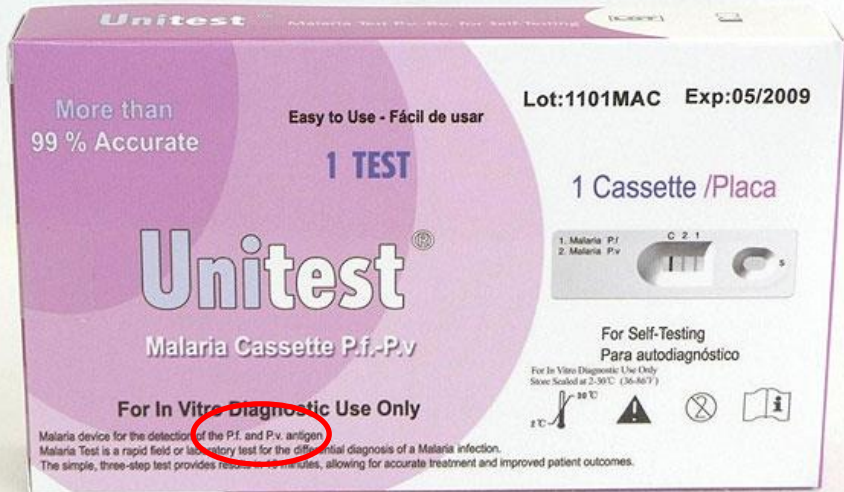
## External Quality Assessment of Reading and Interpretation of Malaria Rapid Diagnostic Tests among 1849 End-Users in the Democratic Republic of the Congo through Short Message Service (SMS)

Pierre Mukadi<sup>1,2</sup>, Philippe Gillet<sup>3</sup>, Albert Lukuka<sup>1,4</sup>, Jacques Muyembe<sup>1,7</sup>, Jozefien Buyze<sup>3</sup>, Jan Jacobs<sup>3</sup>,



Multiple MCQ answers (MCQ) and of participating in the EQA. 002

# Procurement and supply **What we ordered and what we received**



**Labeling is part of the IVD risk mitigation**



# Poor or wrong information instructions for use

At the present...  
malaria is diagnosed by  
looking for the parasites  
in a drop of blood.

At the most recent...  
diagnostic issues are  
the detection of  
malaria antibodies by  
immunoassay

## One Step Malaria P.f / P.v Ab Test Device (WB/Serum/Plasma)

### 1. Explanation of the test

Malaria is a serious, sometimes fatal, parasitic disease characterized by fever, chills, and anemia and is caused by a parasite that is transmitted from one human to another by the bite of infected Anopheles mosquitoes. There are four kinds of malaria that can infect humans: Plasmodium falciparum, P. vivax, P. ovale, and P. malariae. In humans, the parasites (called sporozoites) migrate to the liver where they mature and release another form, the merozoites. The disease is a major health problem in much of the tropics and subtropics. More than 200 million people in the world have malaria.

At the present, malaria is diagnosed by looking for the parasites in a drop of blood. Blood will be put onto a microscope slide and stained so that the parasites will be visible under a microscope. At the most recent, clinical diagnostic issues related to malaria are the detection of malaria antibodies in human blood by immunoassay. The ELISA format and immunochromatographic format (rapid) to detect antibody of malaria are available recently.

The Malaria P.f/P.v Ab test is a immunochromatographic (rapid) test for the qualitative detection of antibodies of all isotypes (IgG, IgM, IgA) specific to Plasmodium falciparum and Plasmodium vivax simultaneously in human serum or plasma or whole blood. The Malaria P.f/P.v test contains a membrane strip, which is pre-coated with

- 4) Sterile lancet
- 5) Pipette

A complete set for home use may also contain the following accessories in a separate poly bag:

- 1) Pipette
- 2) Alcohol pad
- 3) Bandage

### 3. Precautions

The Malaria P.f/P.v Ab test devices should be stored at room temperature. The test device is sensitive to humidity and as well as to heat. Perform the test immediately after removing the test device from the foil pouch. Do not use it beyond the expiration.

### 4. Specimen collection and storage

- 1) Fingerstick Specimens (Whole Blood)  
Clean the area to be lanced with Alcohol prep pad. Squeeze the end of the fingertip and pierce it with the sterile lancet.  
Wipe away the first drop of blood with sterile gauze or cotton. Using Disposable pipette, collect blood from the puncture site.
- 2) (Serum or plasma) Centrifuge whole blood to get plasma or serum specimen.
- 3) If serum is not tested immediately, it should be refrigerated at 2-8°C. For storage periods greater than three days, freezing is recommended. They should be brought to room temperature prior to use.
- 4) Serum containing precipitate may yield inconsistent test results. Such specimens must be clarified prior to assaying.



## Poor or wrong information **in instructions for use**

# Promise versus Reality: Optimism Bias in Package Inserts for Tuberculosis Diagnostics

Claudia M. Denkinger,<sup>a</sup> Jasmine Grenier,<sup>b</sup> Jessica Minion,<sup>c</sup> and Madhukar Pai<sup>d,e</sup>

Department of Medicine, Beth Israel Deaconess Medical Center, Boston, Massachusetts, USA<sup>a</sup>; Faculty of Medicine, McGill University, Montreal, Quebec, Canada<sup>b</sup>; Department of Medical Microbiology & Immunology, University of Alberta, Edmonton, Alberta, Canada<sup>c</sup>; Department of Epidemiology, Biostatistics, and Occupational Health, McGill University, Montreal, Quebec, Canada<sup>d</sup>; and Respiratory Epidemiology & Clinical Research Unit, Montreal Chest Institute, Montreal, Quebec, Canada<sup>e</sup>

Laboratorians and clinicians often rely on package inserts of diagnostic tests to assess their accuracy. We compared test accuracy for tuberculosis diagnostics reported in 19 package inserts against estimates in published meta-analyses and found that **package inserts generally report overoptimistic accuracy estimates**. However, package inserts of most tests approved by the U.S. Food and Drug Administration (FDA) or endorsed by the World Health Organization provide more realistic estimates that agree with meta-analyses.



# No information (labeling including instructions for use)

## Retrospective evaluation of immunochromatographic *Salmonella* diagnostic tests for the rapid detection of *Salmonella* serovars in blood culture fluid



INSTITUTE  
OF TROPICAL  
MEDICINE  
ANTWERP



L.M.F. Kuijpers, P. Chung, B. Barbé, C. Kham, J. Jacobs

<sup>1</sup>Institute of Tropical Medicine, Antwerp, Belgium, <sup>2</sup>Department of Microbiology and Immunology, KU Leuven, Belgium, <sup>3</sup>Sihanouk Hospital Centre of HOPE, Phnom Penh, Cambodia



(Serum/Stool)

### Sensitivity:

S. typhi-S. paratyphi assay was run using serum and stool samples versus culture positive samples and found to give positive results in all cases.

### BIBLIOGRAPHY

1. Ivanoff BN, Levine MM, Lambert PH. Vaccination against typhoid fever: present status. Bulletin of the World Health Organization 1994; 72: 957-71.
2. Gotuzzo E, Frisancho O, Sanchez J, Liendo G, Carillo C, Black RE, Morris JG. Association between the acquired immunodeficiency syndrome and infection with *Salmonella typhi* or *Salmonella paratyphi* in an endemic typhoid area. Archives of Internal Medicine 1991; 151: 381-2.



# Poor or wrong information Lack of Harmonization

## Hidden errors, brand names and types

Add 19 g to 1 litre of distilled water to which 4 g of Sodium Biselenite (Oxoid L121) has been added. Warm to dissolve, Mix well and fill into containers to a depth of 5 cm. Sterilize in a boiling water bath, or in free flowing steam, for 10 minutes. DO NOT AUTOCLAVE.

Añadir 19 g a 1 litro de agua destilada a la cual se ha añadido 4 g de biselenito sódico (Oxoid L 121). Calentar hasta disolución, mezclar y distribuir en tubos hasta una altura de 5 cm. Esterilizar en baño de agua hirviente o en autoclave a vapor fluente, durante 10 minutos. NO AUTOCLAVAR.

4 g Natriumbiselenit (Art.-Nr. L 121) in 1 l Aqua dest. lösen

One product is lacking  
Sodium Biselenite  
= the selective component!

Xn  
R20/22,  
33,  
37,  
59,  
20/21,  
28,  
36.



Harmful

### Bouillon séléniteux

Base servant de milieu d'enrichissement pour l'isolement de *Salmonella*

Mode d'emploi : Mettre 23 g de poudre en suspension dans 1 L d'eau purifiée. Chauffer jusqu'à ébullition. Ne pas surchauffer. NE PAS AUTOCLAVER. Pour contrôler les performances du produit, tester des échantillons du produit fini en utilisant des cultures de contrôle stables, typiques.

Formule approximative\* par litre

Digestion pancréatique de caséine	5.0 g
Lactose	4.0 g
Sélénite de sodium	4.0 g
Phosphate de sodium	10.0 g

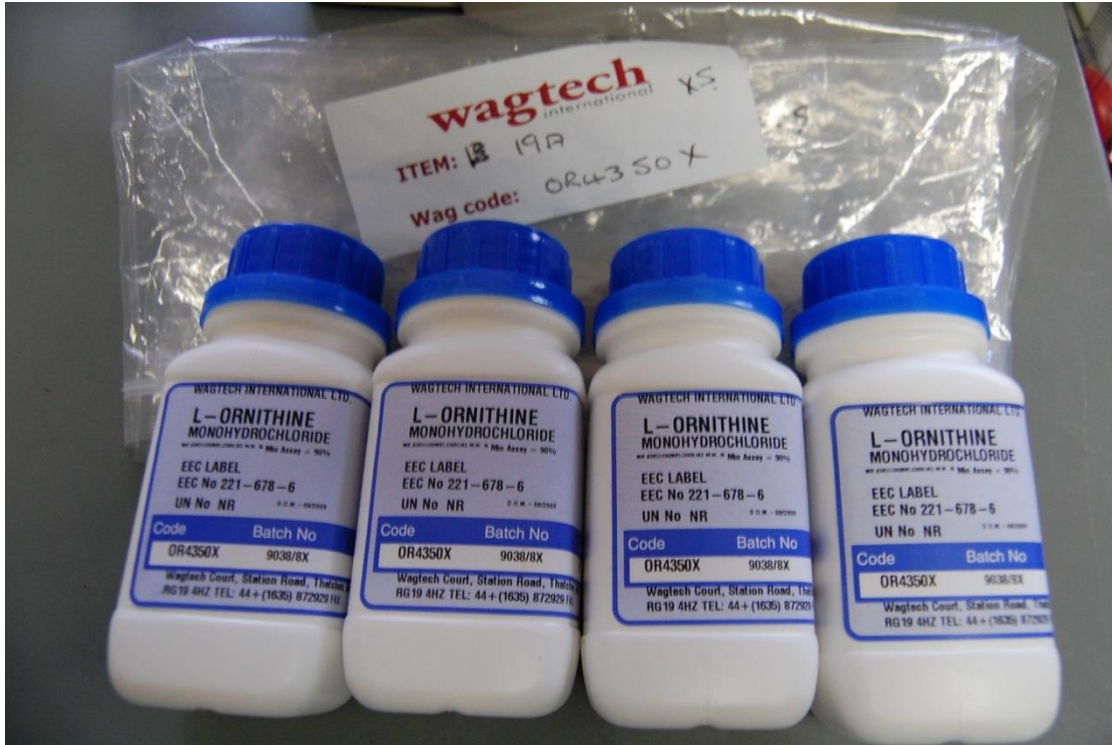
\* Ajustée et/ou complétée en fonction des critères de performances imposés.

Pour usage en laboratoire • pH final 7,0 ± 0,2  
Produit hygroscopique • Bien boucher le récipient.





## Too Expensive



Ornithine decarboxylase,  
216 USD/vial, Cambodia  
not properly working



# ISO attitude (ISO15189 - ISO13485)

Non-advertised change  
of product name



**ISO attitude** (see next speakers)

**Manufacturers not yet client-related**

Handling of customer complaints (see next speaker)

Good-will but unfamiliar with the field/customer

**Distributors**

Knowledge and mastering ("*fournisseurs ambulants*")

Sales practices?

Stock management (customs, payments...)

**Special for IVDs: Rebranders**



*Renault Trafic*



*Opel Vivaro*



*Nissan Cabstar*



# ISO attitude (ISO15189 - ISO13485)

## TEST PROCEDURE (see illustration 1)

Allow test card, reagent, specimen, and controls to equilibrate to room temperature (15-30°C) before testing. Place the test card on a clean and level surface.

### Test Procedure for Serum or Plasma Specimen:

1. Hold the conjugate dropper bottle vertically and transfer 2 full drops (-100 µL) of conjugate into the **reagent port** (marked "R"). Wait for the conjugate to pass the **sample port** (marked "S") as indicated by the red liquid front passing through.
2. Transfer 5 µL of sample (serum, plasma or treated whole blood specimen) onto the membrane in the **sample port** at the bottom of the rectangular test window of the test card.
3. Read result between **10-15 minutes** after the sample application. Do not attempt to interpret result after 15 minutes.

## TEST PROCEDURE

(Please refer to Illustration 1.)

- Allow test card, reagent, specimen, and controls to equilibrate to room temperature (15-30°C) before testing.
- Place the test card on a clean and level surface.

### Test Procedure for Serum and Plasma Specimen:

1. Hold the conjugate dropper bottle vertically and transfer 2 full drops (-100 µl) of conjugate into the **reagent port** (marked "R"). Wait for the conjugate to pass the sample port (marked "S") as indicated by the red liquid front passing through.
2. Transfer 5 µl of sample onto the membrane in the sample port.
3. Read result within **5 minutes** after the sample application. Do not attempt to interpret result after 10 minutes.

*Dear Barbara,*

*We did have validation done on the change.*

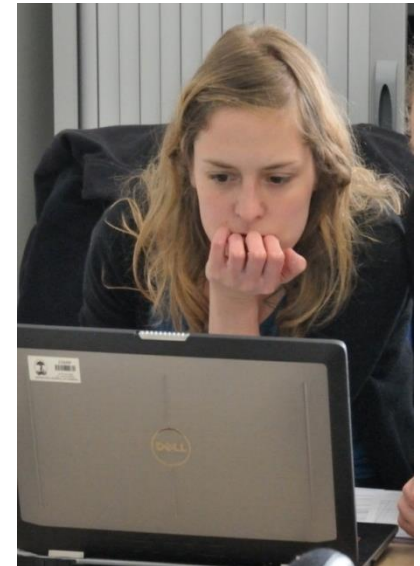
*As I mentioned the in-house validation is usually limited and full evaluation would be required at customers end.*

*If you are not comfortable with the new reading time simply disregard the new version of the package insert"*

## VIEWPOINTS

# Rapid Diagnostic Tests for Neglected Infectious Diseases: Case Study Highlights Need for Customer Awareness and Postmarket Surveillance

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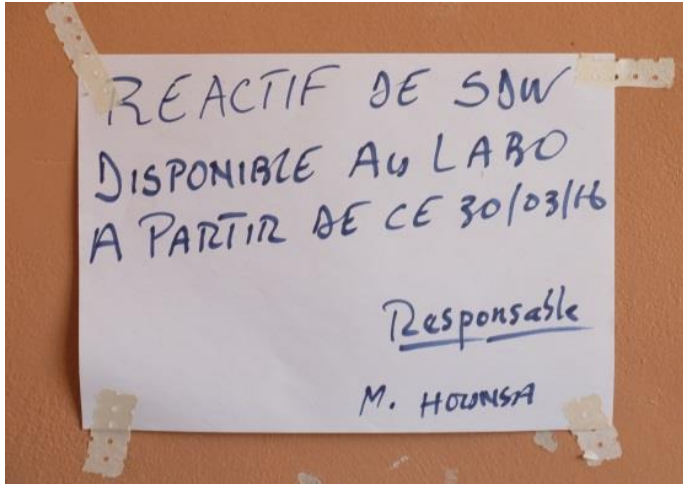
# Diagnostic Stewardship

## The right IVD for the right indication

Education (including CME)

Training

Know what is behind the choice



Note: External Quality Assessment, reference laboratories



The diagnosis of typhoid fever in the Democratic Republic of the Congo

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An EQA on the Widal test consisting of three samples revealed correct scores by respectively 27.1%, 65.6% and 3.1% of 125 participating laboratories. Most (80.9% of 152 laboratories) performed <100 Widal tests per month, with a median sample positivity rate of 32.6% (range 0–90.7%). The Widal test was mostly performed on a single sample and by slide agglutination (89.5% and 97.0% respectively); errors in cold chain and procedures were recorded (not making serial dilutions, estimating titres by the intensity of agglutination). Among 293 prescribers, 52.2% and 40.8% requested the Widal test for treatment follow-up and detection of chronic carriers respectively.



# Note: External Quality Assessment – support from the North

## Diagnostic bacteriology in low and middle income countries

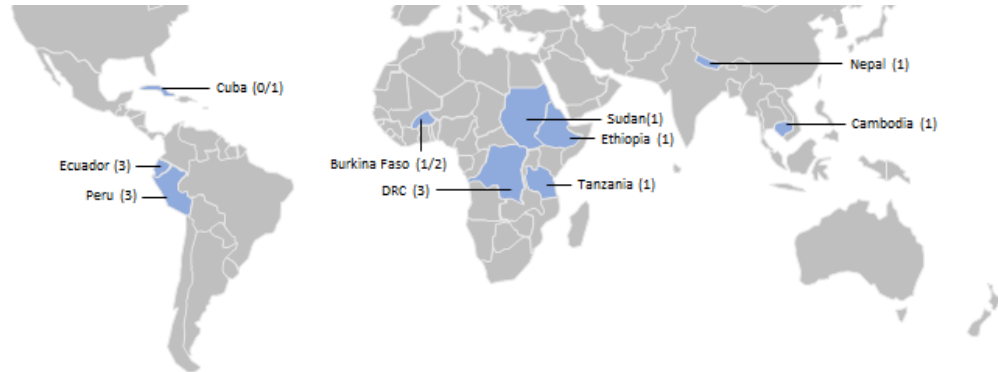
EXTERNAL QUALITY ASSESSMENT OF IDENTIFICATION AND ANTIBIOTIC SUSCEPTIBILITY TESTING

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- For-free use of validated EQA panels provided by the Belgian reference lab
- Learning moments about practices and problems of diagnostic laboratories



# Diagnostic Stewardship

## Why are inaccurate tuberculosis serological tests widely used in the Indian private healthcare sector? A root-cause analysis

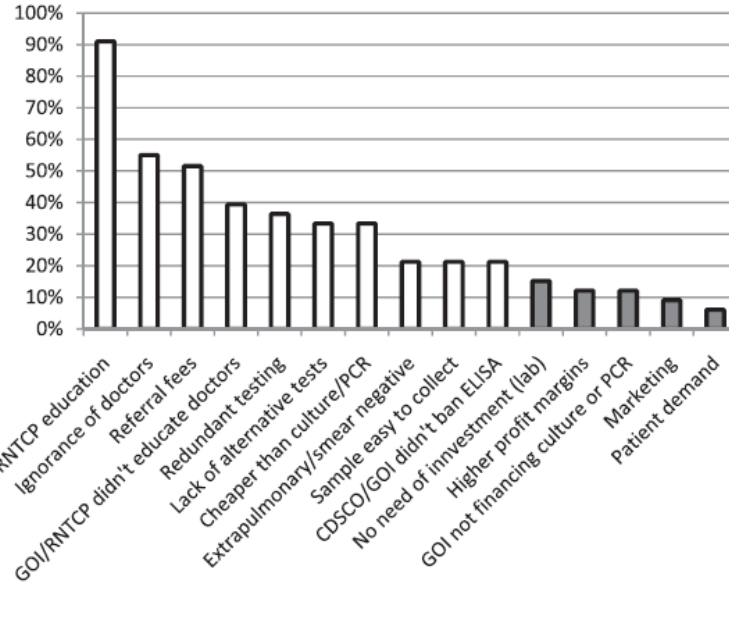
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referral fees (incentives) which encourage the use of serodiagnostics. Doctors who request serological tests are often offered by the private laboratories about 20–50% of the price (i.e., between 150 and 300 rupees) paid by the patient.



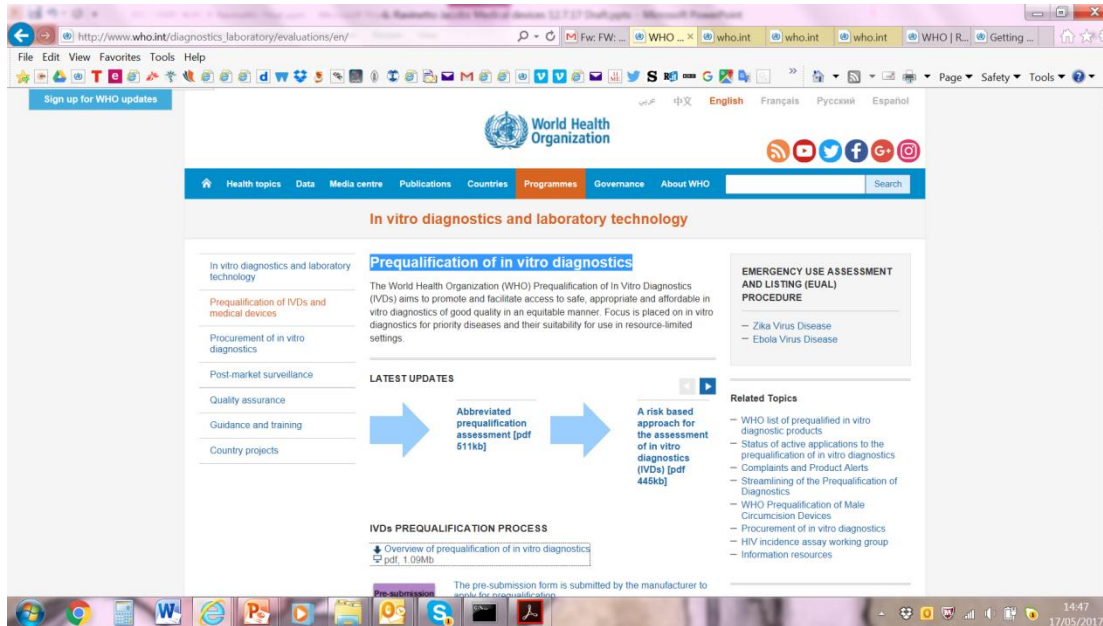
## Take-home messages about quality of IVD in low resource settings

1. **Scope/Extent and Awareness** are still limited, but it exists and is a problem
2. There are **many “faces”** of poor quality of IVDs:
  - **Falsification** small-scale and rare, **Substandards** common and large-scale
  - **Procurement and Supply** is a cause of error
  - **Costs and prices** may influence (tenders, private sector)
  - **IVD instructions for use** poor and/or too optimistic
  - **Failing ISO attitude** among manufacturers, distributors and customers
  - **Diagnostic Stewardship** needs to be developed and disseminated
3. **Professional Societies in the North** can efficiently contribute:  
verifications, product assessments, (external) quality control, awareness, diagnostic stewardship





# WHO Prequalification of in vitro diagnostics



**Prequalification of in vitro diagnostics**

The World Health Organization (WHO) Prequalification of In Vitro Diagnostics (IVDs) aims to promote and facilitate access to safe, appropriate and affordable in vitro diagnostics of good quality in an equitable manner. Focus is placed on in vitro diagnostics for priority diseases and their suitability for use in resource-limited settings.

**EMERGENCY USE ASSESSMENT AND LISTING (EUAL) PROCEDURE**

- Zika Virus Disease
- Ebola Virus Disease

**LATEST UPDATES**

Abbreviated prequalification assessment (pdf 811kb) → A risk based approach for the assessment of in vitro diagnostics (IVDs) (pdf 445kb)

**Related Topics**

- WHO list of prequalified in vitro diagnostic products
- Status of active applications to the prequalification of in vitro diagnostics
- Complaints and Product Alerts
- Streamlining of the Prequalification of Diagnostics
- WHO Prequalification of Male Circumcision Devices
- Procurement of in vitro diagnostics
- HIV incidence assay working group
- Information resources

**IVDs PREQUALIFICATION PROCESS**

Overview of prequalification of in vitro diagnostics (pdf, 1.09Mb)

The pre-submission form is submitted by the manufacturer to...

## OVERVIEW OF THE PREQUALIFICATION OF IN VITRO DIAGNOSTICS ASSESSMENT

### WHO Prequalification of In Vitro Diagnostics

NOTE: Additional technical revisions/updates to this document are currently being formulated by WHO and are expected to be published by 31 March 2017

# WHO Prequalification of in vitro diagnostics

- Review of a product dossier
- Laboratory evaluation of performance and operational characteristics
- Manufacturing site(s) inspection.
- Post-market surveillance is a WHO post-qualification activity which includes reactive and proactive measures:
  - complaint reporting
  - post-shipment/pre-distribution lot testing
  - mandatory manufacturer notification of changes to the product or the quality management system.



# WHO Prequalification of in vitro diagnostics

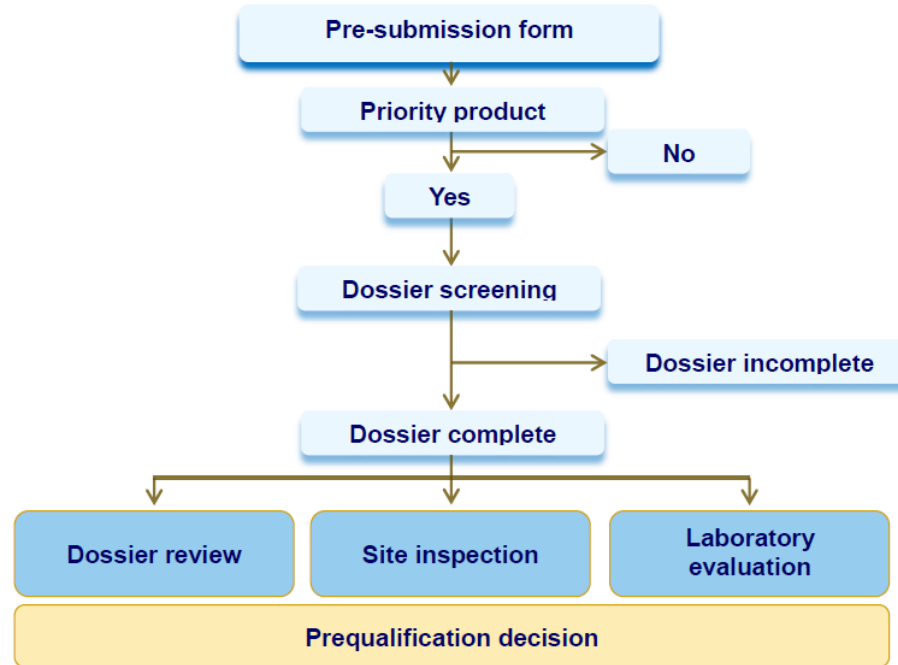


Figure 1 Prequalification of diagnostics: full assessment process

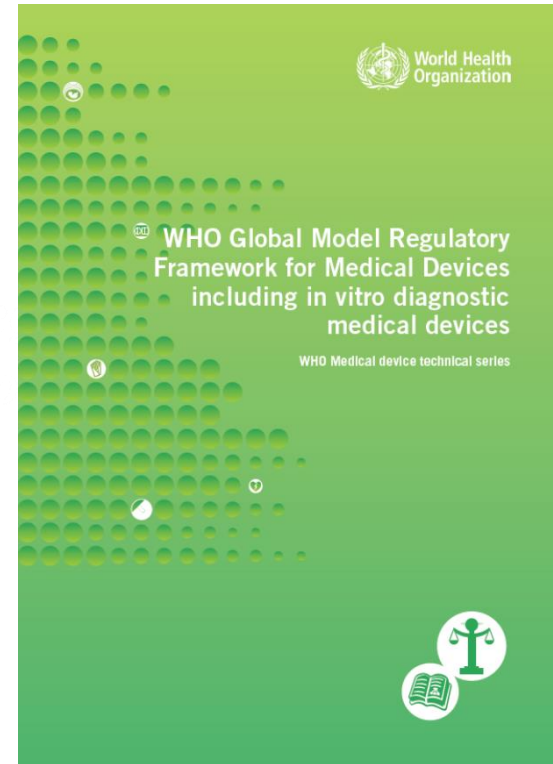
# WHO Prequalification of in vitro diagnostics

- Applications to the WHO PQ must come from the legal manufacturer
- Several manufacturers purchase finalized/semi-finalized products, and then "**re-brand**" and market them under their own name/brand
- WHO considers a "re-branded" product to be one that is manufactured under identical conditions at the same manufacturing site(s) as the original product.
- A "re-branded" product is identical in every aspect to the product by the original manufacturer, except that it is labeled with the "re-branded" product name and purchaser identifier.
- WHO encourages joint applications by original manufacturers and "re-branders". Both must consent to the public disclosure of this "re-branding" arrangement



# Some good news: *WHO Global Model Regulatory Framework for Medical Devices including in vitro diagnostic medical devices*

- WHO Expert Committee on Specifications for Pharmaceutical Preparations, 2016
- Guidance and support to develop/ implement regulatory controls relating to medical devices....
- A progressive, or stepwise, approach to regulating the quality, safety and performance of medical devices.....
- A staged development, from basic-level controls toward expanded-level controls, e.g. inspection of registered establishments and oversight of clinical investigations.



## Word of Thanks

Unit of Tropical Laboratory Medicine, ITM

Partners of ITM in DR Congo, Burkina Faso, Benin, Mozambique and Cambodia

Alumni and students of ITM Tropical Medicine International Health

World Health Organization Prequalification Program

Roll Back Malaria Partnership

Médecins sans Frontières Paris

EUCAST



# Extra slides on the WHO PQ



## Product dossier review

- Assessing evidence in support of *safety and performance* of the product;
- Assessing the product *design and manufacture*;
- Determining if the *manufacturer's quality management system* is of an adequate standard to warrant an inspection of the manufacturing site.



## Laboratory evaluation of the product

- To evaluate the performance and operational characteristics of the product
- Carried out by specified WHO Collaborating Centre(s) or designated laboratory(ies), against pre-determined performance criteria established by WHO.
- The manufacturer should send sufficient quantities (test kits and/or instruments) from at least two different lots
- If necessary, special equipment needed to perform the assay must be made available by the manufacturer at no charge

# Manufacturing site inspection

- To assess compliance of quality management system and manufacturing practices
- To verify the content of the product dossier
- *Stage 1 inspection*: documentation related to quality management. A satisfactory stage 1 inspection is a pre-condition for stage 2
- *Stage 2 inspection*: on-site comprehensive evaluation of the quality management system and production processes
- All nonconformities will have to be addressed by the manufacturer through suitable corrective actions.
- Re-inspection may occur to ensure ongoing compliance with prequalification requirements.
- Re-inspections will typically occur every 3 to 5 years after prequalification, unless an earlier re-inspection is necessary

# Post-market surveillance

- To monitor the ongoing compliance of prequalified products with PQ requirements (*“Post-Market Surveillance of IVD”*)
- The manufacturer will notify WHO of any post-market events that have/could have affected the performance of the assay, safety of the patients, users or any person associated with the product; *and/or* of any post-market events that require corrective actions
- If required, it will supply sufficient quantities of the product to WHO or designated laboratories, for surveillance testing.
- Any post-market events/complaints concerning a prequalified product that is communicated to WHO will be investigated.
- WHO is entitled to make vigilance reports and product alerts public, and to share results/reports with the relevant NRAs and interested UN agencies or other intergovernmental organizations.