

WHO Collaborative Registration Procedure for in vitro diagnostics



Roundtable series: End to end diagnostics implementation; advocating for innovative solution

24 February 2022

Agnes Sitta Kijo, WHO/RPQ/REG/FPI



All medical products should be approved by the national or regional authority before use



WHA Resolutions: WHA 67.20 (2014); WHA 67.21 (2014); WHA63.12 (2010)

How to “transfer/translate” the regulatory information to facilitate in-country approval?

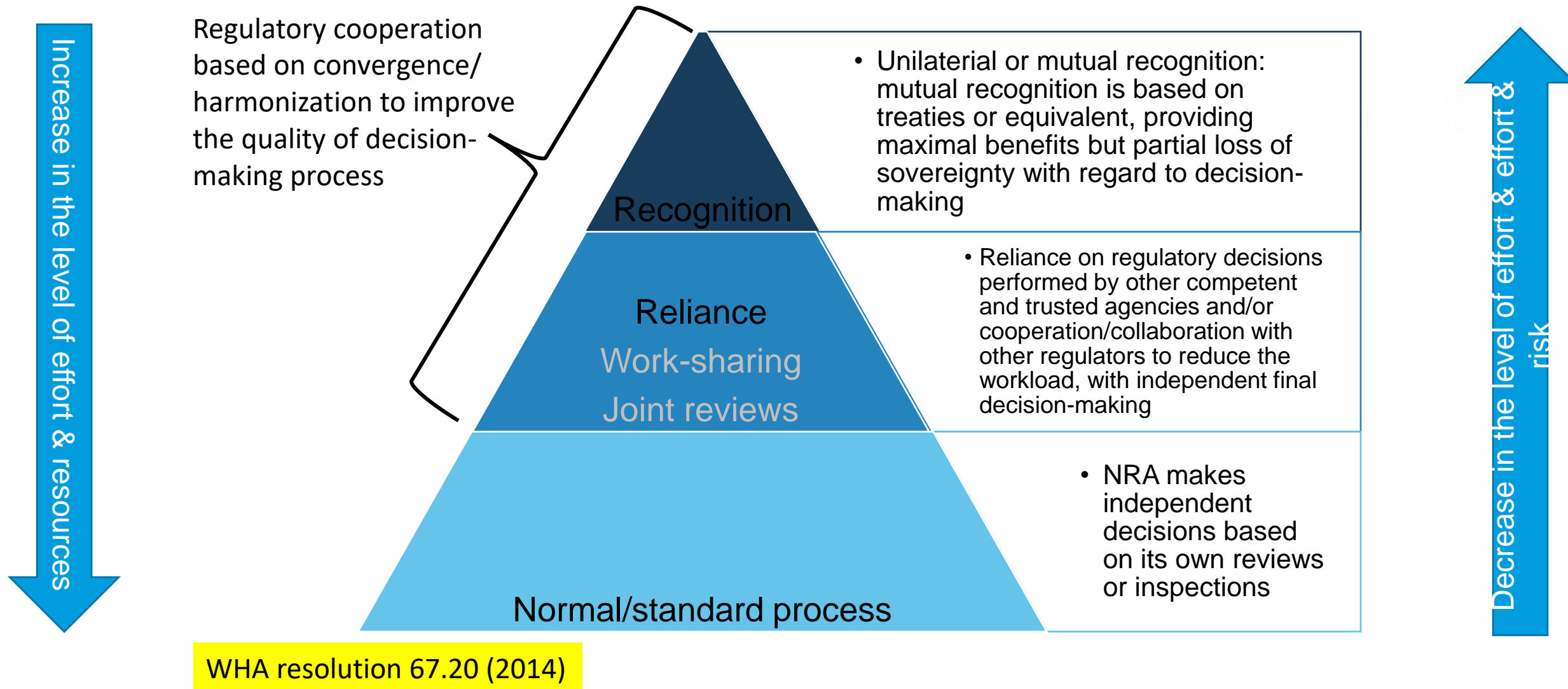
WHO Prequalification provide good basis to facilitate national registration;

How do we get the prequalified products to the patients faster, and more efficient?

How do we ensure continued supply of safe products post-registration?



Rethink- Regulatory decision making



Options for regulators

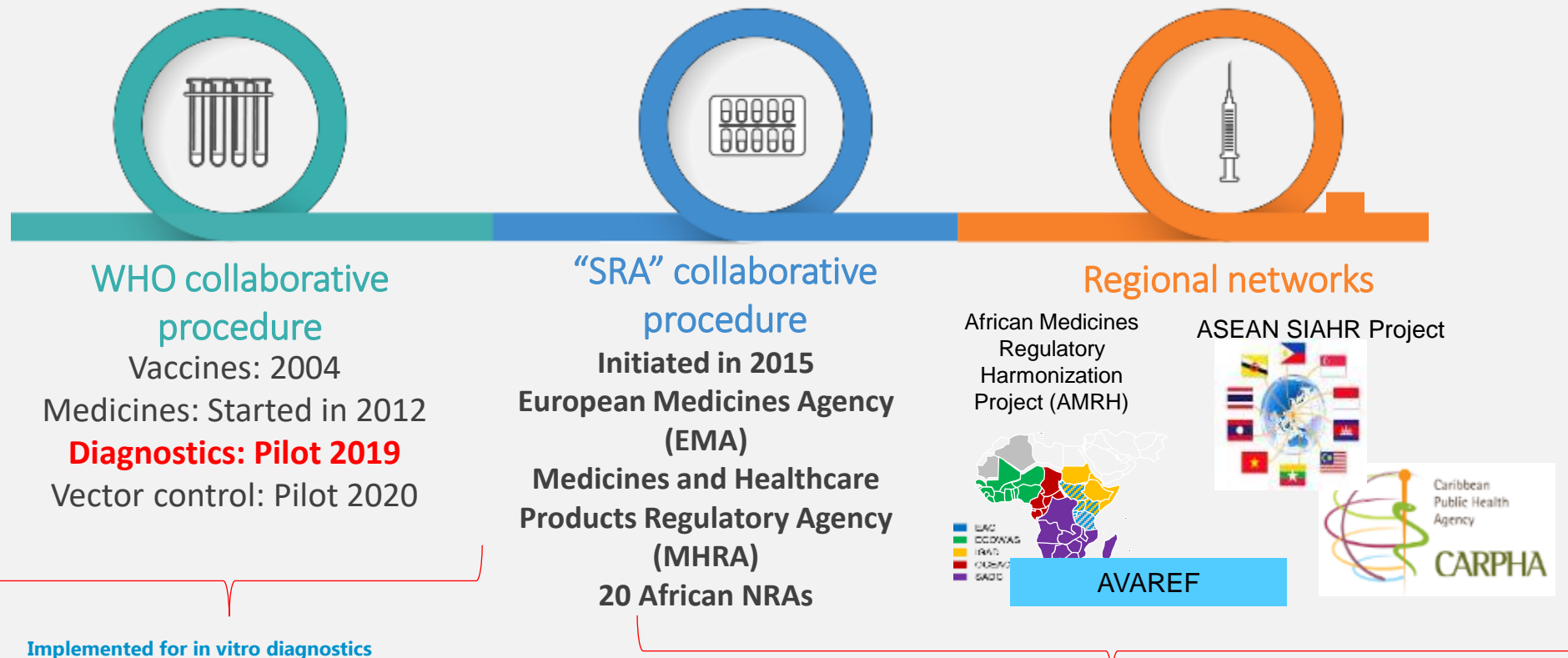


- **Recognize (if outcomes are directly applicable to local context) = Verify sameness**
- **Reliance (if some outcomes are not directly transferrable / applicable to local context) =**
 - ✓ Abridged/abbreviated reviews
 - ✓ Organize R/B second review and inspections (desk assessments)
 - ✓ Consider in decision making
 - ✓ Use as quality assurance of national assessment and decision
- **Conclude differently from WHO PQ - justify**
- **Benefit from shared information for harmonization and training BUT**
- **Accelerate the national decision**

Facilitated pathways to “transfer” regulatory information & knowledge

- Sharing information (assessment, audit and testing results) that serve as basis for national decisions – avoiding duplication.
- Voluntary participation – reference authorities, participating authorities and manufacturers/sponsors
- Sameness

PRINCIPLES

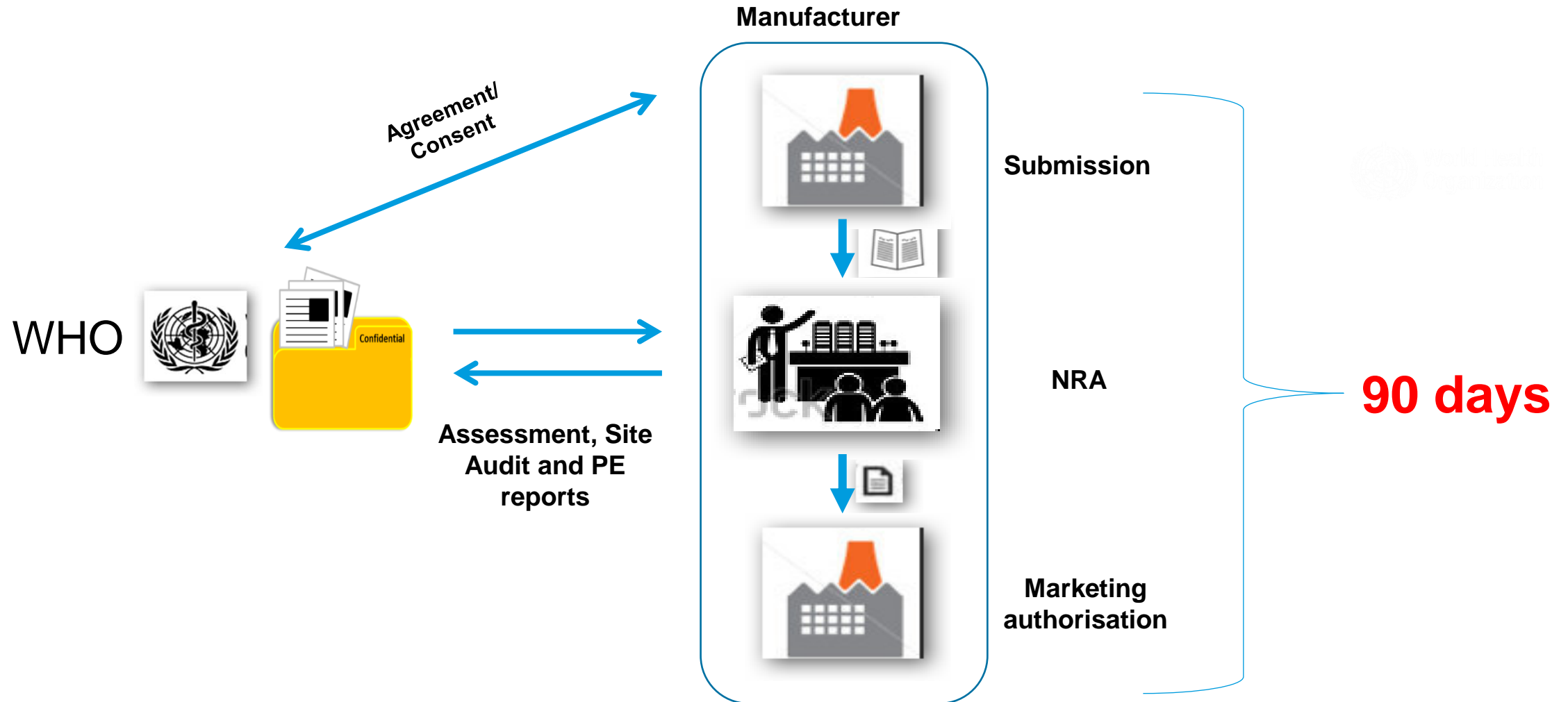


KEY Principles of CRP mechanism

- ✓ Voluntary;
- ✓ Product and registration dossier in countries are “the same” as **prequalified by WHO**;
- ✓ Shared confidential information (shared drive) to support NRA decision making in **exchange for accelerated registration process**;
- ✓ “Harmonized product status” is monitored and maintained.



How does the collaborative procedures works?



Key steps

**Stage 1: NRA Agreement to
participant in WHO - collaborative
Procedure**



**Stage 2:
Collaborative registration of a WHO -PQ'ed product**



**Stage 3:
Post-Approval changes**



**Stage 4:
Registration Maintenance**

Pilot CRP for IVDs: April 2019 – Dec 2019



Objectives:

- Use the WHO-prequalification obtained for m-PIMA HIV-1/2 VL as a basis for country registrations.
- Assess feasibility of new WHO Collaborative Procedure including impact on registration timelines and requirements for additional country-specific studies.

Participating Countries:

Nigeria, Ivory Coast*, Tanzania, Ethiopia, Cameroon*. Upon Abbott request, Ghana was included in the pilot.

Results:

Three countries were able to register the products, Ivory Coast has not registered the product yet and *Cameroon did not participate*

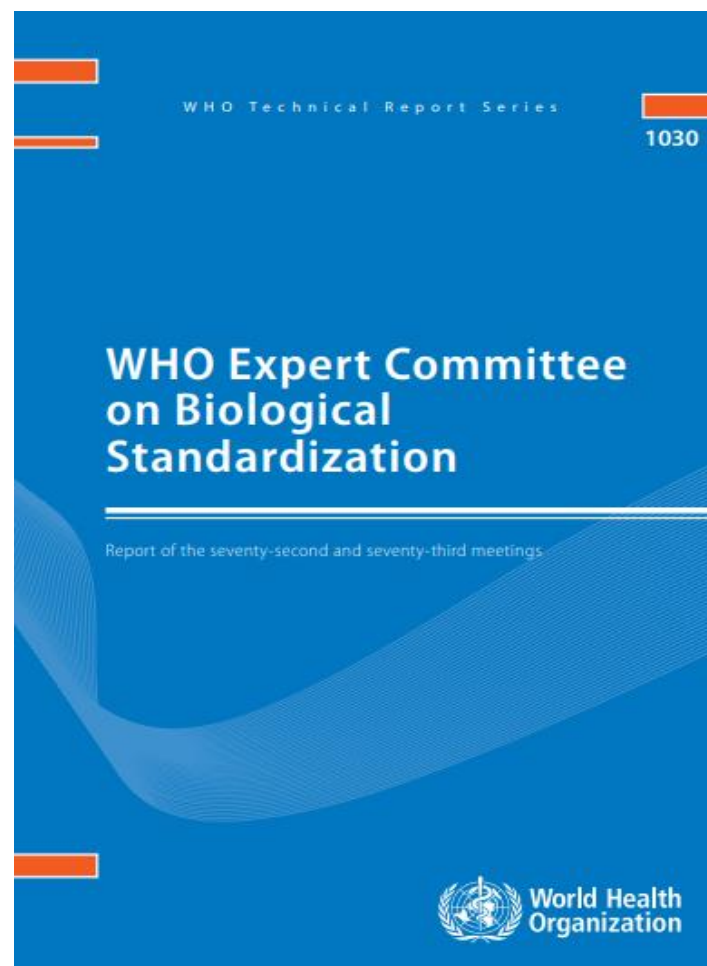
Lessons learned

- Proved to be a great innovative mechanism that can accelerate registration of diagnostics and facilitate timely availability of IVDs. Benefits exhibited include:
 - shorter regulatory approval times. IVDs can be registered within the accelerated timeline of 90 days.
 - reduced workload for NRA experts due to reduced need for in-country evaluations based on acceptance of WHO PQ reports.
- Factors which contributed to delays include:
 - Inadequate capacity of the National Regulatory Authority experts especially in technical files assessment created unnecessary delays in processing and assessment of technical files.
 - In country registration requirements such as repetitive in country performance evaluation.
 - Inadequate communication between key participants.



Guideline published by ECBS- WHO Technical Series Report, 1030 in May 2021- Appendix 4

apps.who.int/iris/handle/10665/341239



Annex 4

Collaborative procedure between the World Health Organization and national regulatory authorities in the assessment and accelerated national registration of WHO-prequalified in vitro diagnostics

1. Introduction	227
2. Purpose and scope of the Procedure	228
3. Terminology	229
4. Principles and general considerations	230
4.1 Participating parties	230
4.2 Sameness of the WHO-prequalified and nationally registered IVD	230
4.3 Submissions format and content of product dossiers for NRAs	231
4.4 Information shared under the Procedure	232
4.5 Applicable national registration fees	233
4.6 Participating authority commitments	233
4.7 Regulatory decision(s) on a WHO-prequalified IVD	235
4.8 Manufacturer commitments	235
5. Steps in the Procedure for market authorization of a WHO-prequalified IVD	236
6. Collaboration mechanisms for post-prequalification and/or post-registration changes	239
7. Withdrawals, suspensions or delisting of WHO-prequalified IVDs and national deregistration	242
8. References	244
Appendix 1 NRA participation agreement and undertaking for NRA focal point(s)	245
Appendix 2 Consent of WHO prequalification holder for WHO to confidentially share information with the NRA under the Procedure	254
Appendix 3 Expression of interest to NRA in the assessment and accelerated national registration, acceptance by NRA and notification of Procedure outcomes	257
Appendix 4 Report on post-registration actions in respect of a product registered under the Procedure	265

Win-win outcomes for all concerned stakeholders



NRAs

- ✓ Having data well organized in line with PQ requirements;
- ✓ Availability of unredacted WHO assessment, inspection and performance evaluation outcomes to support national decisions and save internal capacities;
- ✓ Having assurance about registration of “the same” product as is prequalified;

WHO

- ✓ Prequalified products are faster available to patients;
- ✓ Feed-back on WHO prequalification outcomes;

Manufacturers

- ✓ Harmonized data for PQ and national registration;
- ✓ Facilitated interaction with NRAs in assessment, audits, performance evaluations;
- ✓ Accelerated and more predictable registration;
- ✓ Easier post-registration maintenance;

Procurers

- ✓ Time, assurance, availability.

Timely access to medical products – never-ending challenge

- ✓ Patients/consumers – wherever they are – deserve access to quality assured medical products with positive benefit-risk characteristics - UHC;
- ✓ Not a single regulator anymore can fulfil all regulatory work alone;
- ✓ Today's reality and demand: to generate quality national decisions regulators globally **MUST** collaborate and **MUST** take into consideration the information available from other regulatory authorities;
- ✓ Not using the outputs and outcomes from other regulatory authorities means lost opportunity, duplication of efforts, increased regulatory burden and waste of scarce resources.

Collaborative Registration Procedure (as well as other facilitated regulatory pathways) are critically important in helping to accelerate access to important medical products to the patients.

A boat doesn't go forward if each one is rowing their own way.
~ Swahili proverb



Thank you



World Health
Organization

kijoa@who.int
WHO/RPQ/REG/RCN

WHO
20, Avenue Appia
1211 Geneva
Switzerland

www.who.int