



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

EMA Medical Literature Monitoring service update

Audit, survey and service enhancements

16th Industry Stakeholder Platform – Operation of EU Pharmacovigilance

Presented by Tom Paternoster-Howe on 17 November 2021
Data Analytics and Methods – Healthcare Data

An agency of the European Union





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Key facts



Key facts

Launched July 2015

- Extended September 2015 into full production
- Extended May 2020 to cover 9 additional COVID-related substance groups

409 substance groups covered

- 309 chemical substance groups and 100 herbal substance groups
- Equates to 5,848 substances and combinations

Significant volume of work performed

- >3.15 million articles reviewed
- >64,500 ICSRs created
- >3,200 daily tracking sheets published

Service provided to ~4,000 MAHs



Surveys



Surveys

MLM Service conducts regular surveys of stakeholders to assess satisfaction with the service and identify areas for improvement

- Most recent completed survey conducted in July 2021
 - 9 NCAs and 143 MAHs replied
 - NCA and Industry responses both show high level of satisfaction with the service
- Latest survey currently ongoing until 30 November
- All MAHs affected by the MLM Service have been invited to participate
 - Click [HERE](#) to access the survey
- The following slides summarise the replies of the NCA and MAH survey conducted in July 2021

Survey results – NCA survey

Question	Responses	
I am successfully receiving/able to access the relevant ICSRs generated by the MLM Service transmitted to my NCA	Agree	11.1%
	Strongly agree	88.9%
For the substance groups in scope, I have stopped receiving duplicate ICSRs resulting from literature since the launch of the MLM service	Some duplicates have been removed	11.1%
	A significant amount of duplicates have been removed	77.8%
	All duplicates have been removed	11.1%
The MLM ICSRs (serious cases and non-serious) are currently reported in a timely manner	Agree	88.9%
	Strongly agree	11.1%

Survey results – MAH survey – reviewing and tracking

Question	Responses	
MLM Service staff are proficient in the screening and review of literature	Agree/Strongly agree	92.1%
	Disagree/Strongly disagree	7.9%
I find the SUM_ICSR and SUM_Screen tracking sheets contain the information I need	Agree/Strongly agree	86.4%
	Disagree/Strongly disagree	13.6%
I can easily find the information I need in the SUM_ICSR and SUM_Screen tracking sheets	Agree/Strongly agree	83.2%
	Disagree/Strongly disagree	16.8%

Survey results – MAH survey – ICSRs

Question	Responses	
The MLM ICSRs (serious cases and non-serious) are currently reported in a timely manner	Agree/Strongly agree	90.9%
	Disagree/Strongly disagree	9.1%
The MLM ICSRs created by MLM Service are of good quality	Agree/Strongly agree	86.0%
	Disagree/Strongly disagree	14.0%
I download the ICSRs produced by the MLM Service from EudraVigilance	Yes	84.7%
	No	15.3%
I forward the ICSRs produced by the MLM Service on to at least one non-EEA regulator where required	Yes	43.6%
	No	56.4%
My organisation's business processes have been adapted to no longer submit the ICSRs resulting from the MLM Service to EudraVigilance	Agree/Strongly agree	97.7%
	Disagree/Strongly disagree	2.3%

Survey results – MAH survey – service desk

Question	Responses	
I know that if I have questions, comments or reports of errors or duplication I should contact the MLM Service Desk	Agree/Strongly agree	92.1%
	Disagree/Strongly disagree	7.9%
The MLM Service desk responses are provided in a timely manner	Agree/Strongly agree	91.4%
	Disagree/Strongly disagree	8.6%
I receive good quality replies from MLM Service desk	Agree/Strongly agree	89.8%
	Disagree/Strongly disagree	10.2%



Audit

Audits

The Agency commissions regular independent audits of the MLM service to assess contractor compliance with contractual obligations and identify potential risks to smooth operation of the service and identify areas for improvement

- Most recent audit completed yesterday, covering 1 Dec 2017 to 14 May 2020
 - Auditors identified many strengths and good practices as well as some risks
- Audit will be published shortly on the [MLM webpage](#)
- The following slides detail the strengths and findings
 - The risk level is that given by the auditors and refers to the risk of non-compliance with the contract, rather than PV risk



Audit findings

Auditors highlighted the following strengths and good practices of the current service:

- ✓ An elaborate and well-structured/organised team with well-defined and focused roles, responsibilities, back-ups and team management is in place. People are trained in their role and have a good understanding of their responsibilities;
- ✓ ...mechanisms for managing the workload – this appears to adequately address the challenge of the rather unpredictable daily amounts of relevant literature records resulting from searches;
- ✓ The relevant IT environments with required capacity and redundancy for a reliable service under normal operation are foreseen;
- ✓ Several quality reporting controls have been implemented for regular monitoring against KPI targets.

Audit findings

Finding	Anticipated risk after IAP implementation
Searching of medical literature	
3.1.1 Embase and EBSCO subscription not fully compliant with target KPIs	Very Low
3.1.2 No errors identified in searching input; however highly manual searching process and incomplete and inaccurate audit trails. Gaps include date range, search string and missing information to ensure full traceability of activity	Very Low
3.1.3 6.1% of articles not translated within 3 days as per KPI. From 2020 this figure reduced significantly	Very Low
3.1.4 For searches providing no results, quality control/ quality assurance not performed	Medium

Audit findings

Finding	Anticipated risk after IAP implementation
Screening and reviewing of medical literature	
3.2.1 Delayed FTA receipt leads to late closure of some potential ICSRs (not within 5 working days)*	Very Low
3.2.2 KPI on minor decision errors (not impacting the final classification) consistently but slightly under target	Low

*Cause of the delay is not within control of Contractors/EMA. This does not cause late submission of valid ICSRs because day zero only starts when the article is received.

Audit findings

Finding	Anticipated risk after IAP implementation
Processing of individual cases related to suspected adverse reactions	
3.3.1 4.4% of ICSRs entered later than the KPI mandated day (day 7 for serious and day 21 for non-serious)	Low
3.3.2 Submission of relevant ICSRs to EMA for QC not always meeting timeliness KPI	Medium
3.3.3 Errors in ICSR processing prior to June 2020 are noted (e.g. missing or inaccurate info) prior to submission. Percentage of errors decreased in 2020 and in 2021	Very Low
3.3.4 Daily "SUM ICSR" tracking sheet contains inaccurate reporting of duplicates	Medium



Audit findings

Finding	Anticipated risk after IAP implementation
Quality management	
3.5.1 Change Management, Nonconformity and Corrective Actions processes are not fully in compliance with the requirements of ISO 9001:2001	Low
3.5.2 Some activities and controls are not fully covered by the SOPs and WINs	Low
Service and operation management and periodic reporting	
3.6.1 Two target KPI activities from this process are not performed as mandated and/or in a timely manner	Very Low
3.6.2 The calculation method of four KPIs is not clearly defined	Very Low



Service enhancements



Service enhancements

EMA and MLM service contractors have made and are making the following enhancements to the service to address matters raised during the surveys, risks which were identified during the audit and to generally improve the service

- Medical review and QA staff numbers increased in 2019 and 2020 to improve timeliness of submission of ICSRs to EMA for review
 - This also increased the quality of the ICSRs submitted to EV
- Quality assurance activities now performed on searches which return no results
- Tracking database and outputs being amended to ensure greater consistency
- SOPs and WINs updated to include all activities and controls – latest updated versions to be published in December
- Survey added to service desk replies so that users unhappy with their reply can immediately indicate it and MLM Service can investigate and staff can receive immediate feedback

Service enhancements

New tender for running MLM Service currently under evaluation

To address requests from industry and further enhance the service, the following services, in addition to the existing service levels, are requested in the tender and may be included in the MLM service in the future

- Running searches in PUBMED, or equivalent, in parallel with searches in existing databases
 - This will speed up identification of those articles indexed by both databases
- Increasing the information presented in the tracking sheets to include patient demographics to aid reconciliation
- Increasing the number of substances covered by the MLM Service

All enhancements will be announced at least 6 months before coming into effect to allow industry time to adapt processes



Any questions?

Further information

[MLM Webpage](#) • [MLM Service Desk](#)

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