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Instructions for marketing authorizations holders for medicinal products for human use in Romania, regarding the submission of direct healthcare professional communications for approval by NAMMDR

1. Scope

This document contains recommendations addressed to marketing authorization holders (MAHs) regarding the content of direct healthcare professional communications (DHPCs) and related communication plans, as well as instructions on how these should be submitted to NAMMDR for approval at national level. This document should be read in conjunction with the European Medicines Agency (EMA) GVP Module XV – Safety communication.

2. Legal framework

The pharmacovigilance legislation includes a number of provisions to regulate safety communication and its coordination:

- Commission Implementing Regulation (EU) No. 520/2012 on the performance of pharmacovigilance activities provided for in Regulation (EC) No 726/2004;
- REGULATION (EU) No 1235/2010 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 15 December 2010 amending, as regards pharmacovigilance of medicinal products for human use, Regulation (EC) No 726/2004;
- DIRECTIVE 2010/84/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 15 December 2010 amending, as regards pharmacovigilance, Directive 2001/83/EC;
- Law No. 95/2006 on healthcare reform, as republished, TITLE XVIII- The Medicinal Product, Chapter X- Pharmacovigilance.

✓ In managing the communication of safety information to patients and healthcare professionals, NAMMDR aligns with the recommendations provided in GVP Module XV – Safety communication.

3. Content and format of a DHPC

Safety communication should deliver relevant, clear, accurate and consistent messages. Also, the information provided in the communication should be objectively presented, must not be misleading and must not contain any material or statement which might constitute advertising, within the meaning of Law No. 95/2006 on healthcare reform.

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NAMMDR uses a DHPC template and a Communication Plan template, in Romanian language, aligned with EMA templates provided in GVP Annex II – Templates (see *Annex II – Templates: Direct Healthcare Professional Communication (DHPC)* și *Annex II – Templates: Communication Plan for Direct Healthcare Professional Communication (CP DHPC)*).

These templates are available in Romanian language on NAMMDR website, in section: Medicines for human use- Pharmacovigilence - Direct healthcare professionals communications. MAHs are advised to use them for initiating a DHPC. Also, in respect to the format of a DHPC, it is recommended to use **Times New Roman font**, size 12, except for the title and Summary sections, for which it is recommanded font size 14.

4. Who may initiate a communication on safety issues

DHPCs are usually disseminated by one MAH or a group of MAHs, either at the request of a national competent authority or EMA, or on their own's initiative.

Thus, in case of medicinal products authorized in Romania through a purely national procedure, when NAMMDR identifies a safety issue that should be communicated to healthcare professionals, NAMMDR can request MAH/Legal Representative in Romania of MAH to present, as soon as possible, a proposal for a DHPC and a related communication plan, concerning the identified safety problem and, subsequently, to manage the distribution of the approved documents. The final form will be agreed, before distribution, between the MAH and the Competent Authority.

5. Management of a product-specific DHPC according to the product authorization procedure

If MAH considers necessary to distribute a DHPC, the MAH will address either EMA or NCAs, depending on the authorization procedure of the medicine that is the subject of respective communication, as follows:
- for **centrally** authorised medicinal products, the MAH should submit the draft DHPC and communication plan to EMA for evaluation and approval. After the DHPC is agreed, the MAH should submit the Romanian translation of the DHPC to NAMMDR for approval at national level;
- for medicinal products authorised through the **decentralised procedure** (**DCP**) or **mutual recognition procedure** (**MRP**), the MAH should submit the draft DHPC and communication plan to the Reference Member State, which should co-ordinate the approval process with the MAH. After the DHPC is agreed with the Reference Member State, MAH should submit the Romanian translation of the DHPC to NAMMDR for approval at national level;
- for **purely nationally** authorised medicinal products, the MAH should submit the draft DHPC and communication plan to NAMMDR for approval.

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6. Distribution of an EU approved DHPC to the Romanian target population

Usually, the DHPC is initiated and distributed only for medicinal products already available on the Romanian market. Particular situations, for example when a medicinal products is planned to be marketed in a short period, will be discussed with NAMMDR case by case.

A DHPC initiated at EU level will be submitted to NAMMDR for approval only when the medicinal product it refers to is marketed in Romania. The submission to NAMMDR will be made in accordance with the communication plan approved by the PRAC/CHMP/CMD(h)/RMS (as applicable). After national approval of the DHPC and the communication plan, the distribution of the DHPC will be made in accordance with the terms established in communication plan.

However, depending on the situation, the MAH may adapt the content of the DHPC/ communication plan to reflect the specific situation of the national health system (for example, the proposed recipients or the distribution calendar of the DHPC).

The target groups of recipients that might be taken into consideration by MAH are the following:
- medical specialists in the specialties within the scope of communication;
- general practitioners;
- pharmacists from community pharmacies/hospital pharmacies;
- Romanian healthcare professional organisations etc.

For reaching the desired target audience, the use of a varied and increasingly extensive range of communication tools and channels might be considered by MAH for DHPC distribution:

- ✓ **Mail** (in this case, the DHPC should be sent in written form, to the recipient's postal address, with a request for confirmation of receipt);
- ✓ **Electronic mail** (in this case, DHPC should be attached to the e-mail*, with a request for a read receipt);
- ✓ Through **medical representatives** of MAH etc.

*In case of DHPCs distributed by email, MAHs are recommended to use the following format for the the title of the email addressed to the Romanian recipients: "COMUNICARE DIRECTĂ CĂTRE PROFESIONIȘTII DIN DOMENIUL SĂNĂTĂȚII - *title of the communication*", to facilitate quick identification and differentiation of a DHPC from other communications received.

7. DHPC covering several medicinal products affected by a single safety concern (Joint DHPC)

In case several marketing authorisation holders are involved in issuing one DHPC (i.e. when the DHPC covers several medicinal products with the same active substance or products within the same therapeutic class), MAHs are strongly encouraged by NAMMDR to colaborate in such manner that one single DHPC to be distributed to HCPs. Thus, it is recommended that one single MAH to act on behalf of all concerned MAHs as the contact point for NCA during the DHPC approval process and subsequently, to coordinate the dissemination of the communication to the recipients.

Where generics are involved, the contact point should normally be the **marketing authorisation holder of the originator product**. If no originator product is authorised or marketed in Romania, one of the concerned generic companies is encouraged to act as the contact point.

Such coordination will ensure the receipt of a single DHPC by the healthcare professionals, covering all medicines concerned by the safety concern, so a single consistent message to be conveyed.

8. Submission of the request for DHPC approval to NAMMDR

The MAH submits to NAMMDR the request for DHPC approval using one of the following methods:

- Submission in electronic format (by e-mail) to the registration office of NAMMDR (registratura@anm.ro), specifying that the request is addressed to the Pharmacovigilance and Risk Management Unit. Please add farmacovigilenta@anm.ro to the distribution list of the e-mail.

- Submission in physical format to the registration office of NAMMDR, specifying that the request is addressed to the Pharmacovigilance and Risk Management Unit. In this case, the documentation should be presented on CD, by e-mail (farmacovigilenta@anm.ro) or using the Upload platform (by selecting the recipient: Pharmacovigilance and Risk Management Unit).

- Transmission through the Common European Submission Platform (CESP) portal.

! In case of a DHPC previously approved by the PRAC/CHMP/CMD(h)/RMS (as applicable), the MAH should submit the request to NAMMDR according to the agreed timetable.

The documentation shall contain the following:

A. The **Cover letter** outlining the context for issuing the DHPC and the identified safety concern; it should be mentioned also whether the DHPC submitted for approval represents the translation of a DHPC already approved at EU level or it is a communication issued by the MAH at national level;

B. The document named "**Comunicare Directă către Profesioniștii din Domeniul**

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Sănătății", (in Romanian language), in editable format – Word (template available on NAMMDR website);

C. The document named "**Plan de Comunicare**", (in Romanian language) in editable format – Word (template available on NAMMDR website);

D. **The EU DHPC** and **the Communication Plan,** in English language, if these documents have been previously approved by the PRAC/ CHMP/CMD(h)/RMS (as applicable)

During the DHPC assessment, NAMMDR sends by email to the MAH any changes/comments (with track-changes) to the submitted documents, with a request for feedback. Once the DHPC documentation has been agreed with the MAH, the NAMMDR approval process will be finalized. The official approval letter, accompanied by the DHPC and the communication plan, will be available at the Registration Office of NAMMDR.
The approved documents (in word format) will be subsequently sent to MAH by email (in word format).

Following approval process, the MAH will send to NAMMDR by email a detailed situation regarding the distribution of DHPC to the target audience, upon completion of this process.

✓ NAMMDR transmits, for information purposes, the approved safety communications to relevant professional institutions/organizations from Romania, namely: the National Health Insurance House, The Romanian College of Physicians (CMR), The Pharmacists' College in Romania (CFR), the Ministry of Health.

9. DHPC publication on NAMMDR website

NAMMDR publishes on its website all approved DHPCs, in the section: Medicines for Human Use - Pharmacovigilance - Direct communications to health professionals.

The timing for DHPC publication is aligned to that of the dissemination of DHPC, as per the approved Communication Plan.

10. Contact details

Queries for DHPC approval process should be sent to the following e-mail address: farmacovigilenta@anm.ro.

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