## Oracle Argus Safety

# EC Manufacturer Incident Report (MIR) Best Practices





Oracle Argus Safety EC Manufacturer Incident Report (MIR) Best Practices, Release 8.2.2

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#### **Preface**

This preface contains the following sections:

- · Documentation accessibility
- · Related resources
- Access to Oracle Support

  To receive support assistance, determine whether your organization is a cloud or on-premises customer. If you're not sure, use Support Cloud.

### Documentation accessibility

For information about Oracle's commitment to accessibility, visit the Oracle Accessibility Program website at http://www.oracle.com/pls/topic/lookup?ctx=acc&id=docacc.

#### Related resources

All documentation and other supporting materials are available on the Oracle Help Center.

### Access to Oracle Support

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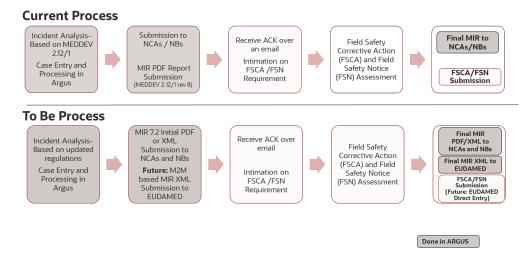
### Introduction

Oracle Argus Safety 8.2.2 provides a solution for Reporting Manufacturer Incident Report (MIR) for a device product that has received marketing authorization in the European Region.

European Commission has released a new version of Manufacturer Incident Report (MIR) Version 7.2, which comprises of both PDF and XML report. It is understood that the European Commission is also planning to implement a new EUDAMED System which will accept MIR XMLs sent by Manufacturers and subsequently send out an acknowledgement which will be accepted/imported by the manufacturer's Oracle Argus Safety system. EUDAMED Implementation is expected by 2022.

National Competent Authorities (NCA) will accept new MIR 7.2 PDF or XML report, and manufacturers will continue to follow the existing MIR processing workflow. Also, in some cases, MIR XML is required to be submitted to Notified Bodies (NB), by the Manufacturers.

#### Manufacturer Incident Reporting Process Overview



2

## Minimum Requirement for MIR Report Generation

- General Tab Updates
  - One identifiable reporter A reporter can be a Patient, Lay User or HCP. It is recommended that at minimum the Role of the Reporter and the Country of the reporter are updated.
- Event Tab Updates
  - One adverse event/reaction (or outcome) which has causality marked as related and at least one seriousness criteria selected.
- Product Tab Updates
  - One Suspect Device Product (License Information is updated: Risk Class, Notified Body Details)
  - One Health Impact Information is updated
  - One Medical Device Problem Information is updated
  - Preliminary Comments are updated for Device Product
  - EU CA Dialog information is updated (Location of Device, MIR Report Type, Root Cause Information, Corrective Action and Projected Timing Information and Comments)
  - Similar Incidents Tab is updated for Final Reports



For more information on validation rules, refer to the Conformance Tab of  $\texttt{MIR\_Export\_Mappings.xlsx}$ .

## Configurations to enable MIR Reporting

Use the following configurations to enable MIR reporting:

- · Reporting Destination
- Update Manufacturer Code List
- Load Device components
- Update Existing Licenses
- Reporting Rules for MIR

### **Reporting Destination**

We recommend that you configure a Reporting Destination with the following settings to enable MIR reports to be sent in either PDF or XML format.

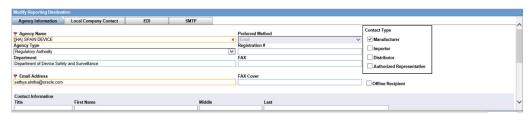
- Agency Information Tab
- EDI Tab
- SMTP Tab

#### **Agency Information Tab**

#### **Configuration of Contact Type in Reporting Destination**

**Contact Type**: It is important that the accurate configuration of Contact Type at the Reporting Destination level is required. Considering the various reporting obligations by the manufacturers, Contact Type of the Reporting destination plays a critical role in categorizing the submission, as either **Manufacturer** or **Authorized Representative**, or **Other**.

It is recommended that only one Contact Type is selected, even though system allows multiple contact types selection. If none of the contact types is selected, system defaults the value to **Manufacturer**.



**Email Attachments**: When the MIR Profile is selected, the Attachments parameter under Report Transmissions Options in the Agency information tab is defaulted to **Single** and disabled. This ensures that the system will generate individual PDF or XML reports, and attach them to an email.

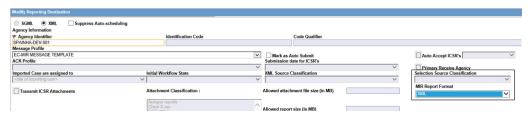
**Example**: If the Report Per email is set to 10, and Report per attachment is set to **Single**, then single email will be sent with 10 individual PDF reports along with a summary report.

#### **EDI Tab**

#### **EDI Tab**

**Message Profile**: Message profile to be selected as EC-MIR MESSAGE TEMPLATE (standard profile for MIR)

- Based on the Message Profile Selected EC-MIR MESSAGE TEMPLATE, the acknowledgment profile field is set to blank and disabled.
- When MIR Profile is selected, the encoding format is defaulted to UTF -8, and the field is disabled.
- When MIR profile is selected, the Preferred Method parameter in the Agency Information tab is defaulted to email and disabled. This ensures that the MIR Reports (both XML and PDF) are sent over an email only.
- System will display a warning message Email is the preferred method
  for MIR Profile if value in the Agency Information/Preferred method is Fax
  and EDI/Message profile is MIR Profile (OOTB or Custom MIR); also if you
  override the message and update the Preferred method to Fax, system will show
  up the same warning message and update the Preferred method to Email.
- Based on the Preferred Method, the Email ID field of the Reporting destination must be updated.



#### SMTP Tab

The MIR report is transmitted via email only. It is recommended to configure the from **Email ID** within the SMTP configuration.

### **Update Manufacturer Code List**

For Device Products with European licenses, Configuration of Manufacturers and Authorized representative is recommended. This ensures population of Submitter information Sec 1.3 of MIR Report.

Manufacturer code list is used to support configuration of both Manufacturer and Authorized Representatives.

It is recommended that the following fields of Manufacturer codelist are updated to support the mandatory fields of the MIR Report.

- 1. Name
- 2. Contact

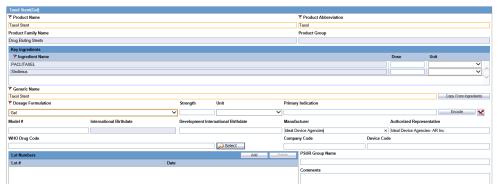


- 3. City
- 4. Address
- 5. State/Province
- Postal Code
- **7.** Phone
- 8. Country
- Email Address



The **Contact** field in the Manufacturer Codelist is used to derive Manufacturer/Authorized Representative Contact's First Name and Contact's Last Name data. It is recommended that first name and last name are configured in a single field with the ';' delimiter. **Example**: John Rich; Configuration of Manufacturers and Authorized Representatives for Existing Products.

 Configure Authorized Representative field and Manufacturer field available in the Product Screen.



- It is recommended that Device Products have Manufacturer and Authorized Representative fields configured. It is important that if the device product that is manufactured outside Europe, it has a mandatory authorized representative to support Authorized Representative data population.
- The European Commission (EC) recommends that the Authorized Representative must belong to EEA (European Economic Area) Country. Therefore it is recommended that Authorized Representative's Country is one of the EEA Countries below.



It is recommended that the EEA Attribute in Countries Flexible Codelist for GB - Great Britain and CH - Switzerland is removed.



Country Code	Country Name	
AT	Austria	
BE	Belgium	
BG	Bulgaria	
CZ	Czech Republic	
CY	Cyprus	
DE	Germany	
DK	Denmark	
EE	Estonia	
ES	Spain	
FI	Finland	
FR	France	
GR	Greece	
HR	Croatia	
HU	Hungary	
IE	Ireland	
IS	Iceland	
IT	Italy	
LI	Liechtenstein	
LT	Lithuania	
LU	Luxemburg	
LV	Latvia	
MT	Malta	
NL	Netherlands	
NO	Norway	
PL	Poland	
PT	Portugal	
RO	Romania	
SE	Sweden	
SI	Slovenia	
SK	Slovakia	
TR	Turkey	

## Load Device components

It is recommended that code list values are loaded within the Device Sub Component Code list based on Annex G provided by IMDRF (International Medical Device Regulators Forum).

Device\_Subcomponents Codelist can be loaded from back end using Annexure G provided by IMDRF.

Annexure G must be loaded to Device Sub Component Code list considering the following column mappings between Annexure G provided by IMDRF, and Device Sub Component Code list in Oracle Argus Safety.



- Loading of Device Components: Standard codelist LM\_DEVICE\_SUBCOMPONENT. SUBCOMPONENT\_NAME is updated via backend with Term (Level1, Level2 and Level3)
- Loading of IMDRF Codes: Flex codelist CODE\_LIST\_DETAIL\_DISCRETE.DISPLAY\_VALUE is updated with IMDRF codes for the decode context IMDRF\_CODE as provided in Annex G
- Loading of Definition: Flex codelist CODE\_LIST\_DETAIL\_DISCRETE.DISPLAY\_VALUE is updated with Definition for the decode context DEFINITION E as provided in Annex G



Harmonized Codes with IMDRF & FDA Codes for Annexures A, B, C, and D and Annexures E and F with IMDRF Codes are pre-loaded in the new repository.

### **Update Existing Licenses**

It is recommended that the Device Licenses for European Region are updated with device information; Following are the important considerations during License configuration. Note that only specific fields that require configuration considerations are mentioned below:

Configuration Consideration	
This field was earlier configured as part of the common profile switches which were common to all device products. For new MIR it is required to configure Medical device terminology for each device license.  This provides flexibility to configure different medical device terminologies of different device licenses.	
This field is an existing field, and updated with new code list values, it covers important values to populate the product's risk class. It is recommended that this field is configured for device products marketed in Europe for which the MIR Reports would be submitted.	
Risk class type configuration is applicable if MDR and IVDR values are configured in Medical Device Information. Risk Class Type field will appear as blank and disabled, if the value selected in Medical Device Information field has as device category MDD/AIMDD, IVDD or if Medical Device Information is blank. It is recommended that this field is mandatory and configured for Device products marketed in Europe for which the MIR Reports would be submitted.  This field is Mandatory for Combined Initial	



Field Label	Configuration Consideration
Nomenclature text	Device description is required to be configured for device products marketed in Europe for which the MIR Reports would be submitted. This field is mandatory for Combined Initial and Final/Final MIR Report Types.
Notified Body ID number (1)	This field is a numeric field and is recommended to be updated for all device products marketed in Europe for which the MIR Reports would be submitted. This field is Mandatory for Combined Initial and Final/Final MIR Report Types.
Notified Body ID number	This field is recommended to be updated for all device products marketed in Europe for which the MIR Reports would be submitted.
Certificate Number of the Notified Body (1) and (2)	There can be multiple Certificate numbers for each Notified Body, Multiple numbers is recommended to be configured by adding a placeholder ';' between multiple Certificate numbers. For example:
	Cert001; Cert002; Cert003
	Based on the above example
	nbCertNum: Cert001; Cert002; Cert003(Upto 50 AN)
	nbCertNumLI: Cert001((Upto 50 AN before the delimiter ';')
	nbCertNumLI: Cert002((Upto 50 AN before the delimiter ';')
	nbCertNumLI: Cert003((Upto 50 AN before the delimiter ';')
Conformity/Market Availability and Date of Conformity/Market Availability	Conformity Details and Conformity Date are recommended to be updated for all device products marketed in Europe for which the MIR Reports would be submitted.

## Reporting Rules for MIR

MIR Report is submitted in PDF or XML format to Notified Bodies, National Competent Authorities and European Commission. MIR Reporting Rules are configured based on the reporting obligations in the European region for the manufacturer.

It is recommended that Marketed Device Licenses and European Countries are considered for Reporting rule configurations.

Below is the summary of Reporting Rule configurations samples for MIR. If the manufacturer has additional obligations, additional configurations need to be considered.



License Type	Report Form	Rule Name	Time Frame	Advanced Condition (AC)
Mkt Device	MIR (PDF)	Related Serious Incident 15 Day MIR Report	15	Health Impact not equal to F20, F21, F02
Mkt Device	MIR (PDF)	Serious Public Health Threat 2 Day MIR Report	2	Health Impact = Serious Public Health Threat (F20)
Mkt Device	MIR (PDF)	Death 10 Day MIR Report	10	Health Impact = Death(F02) or Unanticipated serious deterioration (F21)
Mkt Device	MIR (XML)	Related Serious Incident 15 Day MIR Report	15	Health Impact not equal to F20, F21, F02
Mkt Device	MIR (XML)	Serious Public Health Threat 2 Day MIR Report	2	Health Impact = Serious Public Health Threat(F20)
Mkt Device	MIR (XML)	Death 10 Day MIR Report	10	Health Impact = Death (F02) or Unanticipated serious deterioration (F21)

#### Note:

Refer to Section 5: FAQs on how MIR Reporting is handled for Non Serious Reportable Incidents and how MIR XML and MIR PDF is transmitted together to the same destination.



4

## Case Processing and Reporting

#### In this chapter:

- MIR Report Type
- Data Entry to Support MIR Report
- Update EU CA Device Dialog
- · Similar Incidents Dialog
- Schedule and Transmit MIR Report
- View MIR PDF and XML

### MIR Report Type

Report Type of the MIR Report is populated based on the previous report submitted to the same Reporting Destination and MIR Report Type field in the EU CA Device dialog.

Appropriate data entry in MIR Report type field is required, considering the MIR Report Cycle.



Existing check boxes **Update to Initial Report (Follow-up Report)** and **Final Report** are specific to Canadian Device Report and will not be used for MIR Report.

Previous Report to the same destination	Value selected in MIR Report Type Field in EU CA Device Dialog	MIR Report Type	Comments
No	None	Initial	N/A
No	Final Reportable	Combined initial and final	N/A
No	Final Non-reportable	Initial	This is an Invalid data entry practice. However the Initial would be marked/populated in Report Type.
Yes	Follow up	Follow up	N/A
No	Follow up	Initial	N/A
Yes	Final Reportable	Final (Reportable Incident)	N/A



Previous Report to the same destination	Value selected in MIR Report Type Field in EU CA Device Dialog	MIR Report Type	Comments
Yes	Final Non-reportable	Final (Non-reportable Incident)	N/A
Yes	None	Follow up	N/A

### Data Entry to Support MIR Report

Case form Data Entry is a critical aspect to ensure accuracy of Data and generation of MIR Report, it is required to consider the below recommendations during data entry to ensure accuracy of MIR Report.

It is recommended that only one device product is configured in the case to facilitate MIR report generation for that particular product. Multiple device products for the same case that requires MIR Report generation for each of the device product are not recommended.

For more information, see:

Update Device Tab within the Product Tab

#### Update Device Tab within the Product Tab

Important Data Entry considerations for various fields in the Product Tab are listed below.

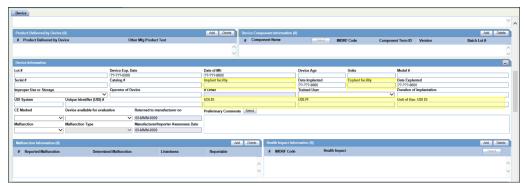


Fields that have direct mapping and do not have validation implications are not treated here.

Field Label	Date Entry Consideration
UDI-DI	EC recommends that for Products which are classified with Risk Class of the device as IVDR and MDR, the <b>UDI-DI</b> field is mandatory. It is recommended that Manufacturer updates the UDI-DI in the case form with products with Medical Device Information configured with IVDR and MDR values.
UDI-PI	EC recommends that for Products which are classified with Risk Class of the device as IVDR and MDR, the <b>UDI-PI</b> field is mandatory. It is recommended that Manufacturer updates the UDI-PI in the case form with products with Medical Device Information configured with IVDR and MDR values.



Field Label	Date Entry Consideration	
Preliminary Comments	This field captures the Preliminary results and conclusions of manufacturer's investigation. This field is mandatory for Initial and Follow up MIR Reports. It is recommended to include this as Page 13 of 22 part of the data entry guideline so that the required data is populated in the MIR Initial and Follow-up Reports.	
QC Result	This field captures the Manufacturer's evaluation of the Incident, This field is mandatory for Final and Combined Initial & Final MIR Reports. It is recommended to include this part of the data entry guideline so that the required data is populated in the MIR Final and Combined Initial & Final Reports.	
Implant Duration	Final and Combined Initial & Final Reports.  If Implant and Explant dates are not known, it is important for the Manufacturer to provide information on approximate implant duration of the Device; It is recommended to enter data in the below format:  If year is known, for example: 12 Years Number of years: 12  If Month is known, for example: 8 Months Number of months: 8  If Day is known, for example: 3 Days Number of days: 3	



#### For more information, see:

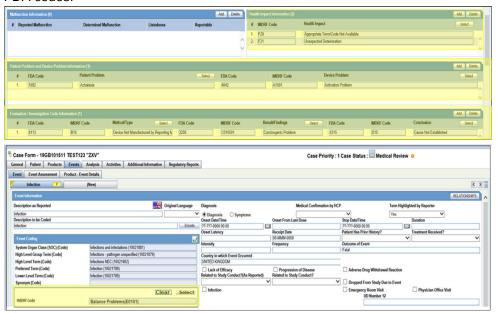
- Common Considerations for Coding Information
- Medical Device Problem Coding
- Health Impact Information Coding
- Evaluation/Investigation Code Information Coding
- Device Component Coding

#### Common Considerations for Coding Information

Consider the following points to add or update the coding information for Medical Device Problem, Health Impact, Clinical Signs, and Evaluation/Investigation:



- Entry of Coding Information is done only by invoking the look-up, New Look
  Up will have both FDA and IMDRF codes for Medical Device Problem Coding,
  Evaluation/Investigation Coding, Health Impact Coding, Clinical Sign Coding and
  Device Component Coding.
- For a case which already has Medical Device Problem and Evaluation Codes and if an obsolete FDA code is used in the case, the decode values should not be displayed in **Device Problem** and **Evaluation/Investigation Result**, **Method** and **Conclusion**. Coding User/Data Entry User is expected to recode such data against the new repository.
- For Legacy cases, you are expected to recode the Medical Device Information and Evaluation/Investigation Information to populate IMDRF Codes based on FDA codes.



New field IMDRF Code is added in the Event tab, System supports a look up
to select the IMDRF Code for the Coded Event, system populates the English
MedDRA LLT Term of the Event in the Term text box of the Search window to
support Clinical Sign Coding, After the selecting the Clinical Sign Term, system
displays the Clinical Sign Term and IMDRF Code in the IMDRF Code field
Example: Balance Problems (E0101).

#### Medical Device Problem Coding

Medical Device Problem coding is an integral part of the Device Reporting, All MIR Report Types require at least one Medical Device Problem to be entered.

Previously Medical Device Problems were part of the **MW Info** tab, and in the Oracle Argus Safety 8.2.2 Release Medical Device Problem Information is moved from **MW Info** to **Product** > **Device Tab** > **Patient Problem and Device Problem Information**.

MIR Report requires Patient Problem codes to be captured in the form of Clinical Sign and Health Impact, However FDA currently has only one type of patient problem codes which is currently available in **MW Info** dialog of the **Device Tab**.

Important Considerations during Medical Device Problem Coding are:



- Medical Device Problem Coding is based on Harmonized codes where an FDA Code has a corresponding IMDRF Code. Therefore Medical Device Problem Coding is required to be handled considering both US and Europe regions.
- For a MIR report to be generated there needs to be at least Medical Device problem available; It is recommended that the data entry guidelines is updated to ensure that for a Case which requires MIR Report to be Scheduled, Medical Device Problem Coding is Mandatory. This is applicable for all Report Types.

#### Health Impact Information Coding

Health Impact Information coding determines the **Classification of Incident** and this information is crucial for all report types.

It is recommended that the data entry guidelines is updated to ensure at least one Health Impact Information is available for a case which requires MIR Report to be scheduled.

MIR PDF Section Number: 1.2.f

MIR PDF Section Number: 1.2.f

MIR Element Name: eventClassification

Health Impact Code available in Health Impact Information Section	Health Impact in Health Impact Information Section	Value transmitted in MIR XML	Comments
F20	Serious Public Health Threat	Serious Public Health Threat	Second Preference is given to Serious Public Health Threat. If any of the Health Impact information has Serious Public Health Threat and Death not present, Serious Public Health Threat is selected in the Report.
F02	Death	Death	First Preference is given to Death. If any of the Health Impact information has death, regardless of other values <b>Death</b> is selected in the Report.



Health Impact Code available in Health Impact Information Section	Health Impact in Health Impact Information Section	Value transmitted in MIR XML	Comments
F21	Unexpected Deterioration	Unanticipated Serious Deterioration in State of Health	Third Preference is given to Unexpected Deterioration, if Death and Serious Public Health Threat is not present in any of the Health Impact information, Unanticipated Serious Deterioration in State of Health Is selected in the Report
Any other Codes	Any other Health Impact Term Coded	All other reportable incidents	Any other health Impact information available, All other reportable incidents is selected in the Report.

#### Evaluation/Investigation Code Information Coding

Previously Evaluation/Investigation Code Information were part of the **MW Info** tab, and in the Oracle Argus Safety 8.2.2 Release Evaluation/Investigation Code Information is moved from **MW Info** to **Product** > **Device Tab** > **Evaluation/Investigation Code Information**.

- Evaluation/Investigation Coding is based on Harmonized codes where an FDA Code has a corresponding IMDRF Code. Therefore Evaluation/Investigation coding is required to be handled considering both US and Europe regions.
- For a Final MIR report and Combined Initial & Final MIR Report to be generated, there needs to be at least one Method/Type, Result/Findings and Conclusion available. It is recommended that the data entry guidelines are updated to ensure that for a Case which requires MIR Report to be Scheduled, Evaluation/Investigation Codes is Mandatory for Final and Combined Initial & Final MIR Reports.

#### **Device Component Coding**

We recommend that the Device Component Information in the **Product** > **Device Tab** is coded by using terms which has corresponding IMDRF Terms. For MIR Report, IMDRF Device Component Terms are populated in Section 4.2 F: IMDRF Component codes of the MIR Report.



## Update EU CA Device Dialog

Field Label	Data Entry Consideration
Incident Classification Information	For Legacy cases, which has Incident classification information in the EU/CA Device Information header, we recommend that you update the Health Impact Codes based on the Information available in EU/CA Device Information header. Incident classification for the New MIR Report is based on Health Impact Information.
Identification of Notified Bodies Involved in Conformity Assessment	New MIR Report logic populates the field Notified body (NB) ID number(s) from the new field available at the Product > License level. We recommend that you verify the data available in the Identification of Notified Bodies Involved in Conformity Assessment field in Legacy cases with data in the Notified Body ID Number field available at the license level.
Associated Accessories	The earlier label of this field was  Accessories/Associated Devices. Existing data within this field has both  Associated Devices and Accessories. It is recommended that the existing data is reviewed and data related to Accessories is retained and data related to Devices is updated in the new Associated Devices field.
NCA Reference Number	This field is updated based on the acknowledgment received by the NCA for Initial Report. For follow-up MIR reports the NCA number is populated and the same number is retained for Final Reports also.
Identification of Notified Involved in Conformity Assessment	This field is a legacy field and is not used in the New MIR Report. However if there is legacy data present in this field, we recommend that you verify the same with the <b>Notified body (NB) ID number</b> field in the License configuration of the Product for which the MIR Report is scheduled. Verification can also be done by generating a draft MIR Report.
MIR Report Type	This is a new field introduced specific to MIR Report. It is recommended that you enter the MIR Report type before scheduling of an MIR Report. <b>Update to Initial Report</b> and <b>Final Report</b> legacy fields are not applicable for MIR Report.
Expected Date of Next Report	For MIR Initial and follow-up Reports this field is mandatory. It is recommended to enter the field for Initial reports and update it based for follow-up report.



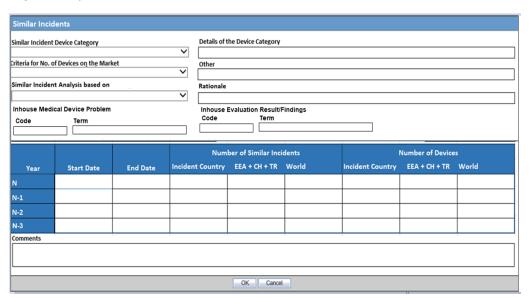
### Similar Incidents Dialog

Similar Incidents occurring with the same device type/variant of a manufacturer with same investigation finding (IMDRF investigation finding; Annex C) and the same medical device problem (IMDRF medical device problem).

Annex A) have to be reported to European Commission (EC). EC also allows usage of the in-house codes for Identification of similar incidents.

Oracle Argus Safety supports capture of the in-house codes for Medical Device Problem and Evaluation Result/Findings that may be used for computation of similar incidents, in addition to the IMDRF Codes.

The identification and computation of count of similar incidents is done outside the Oracle Argus Safety system and fields to capture the results are provided in Oracle Argus Safety.



Similar Incident Information is Mandatory for MIR Combined Initial & Final and Final Reportable Incidents.

### Schedule and Transmit MIR Report

Based on the Reporting rules, configured MIR Report Scheduled can be automated or manually scheduled based on the case data and determination by the Report Distribution group of the company.

MIR Report generated can be viewed via MIR Viewer as MIR PDF or MIR XML.

If Data present in the case does not meet the validation rules, the system will generate a MIR Validation report in a separate window as a PDF, which lists all the failing validation, upon satisfying the validation criteria on regeneration, the system will generate the MIR Report.

MIR Report is transmitted to recipient over an email and transmission can be tracked via Bulk Transmit screen.



#### View MIR PDF and XML

#### MIR PDF:

MIR PDF generated from Oracle Argus Safety would be read-only, and the action buttons at the end of the report after the coded summary of the report is read-only and no actions can be performed such as **Check the form**, **Save as PDF**, **Send XML by Email** and **Send PDF by Email**.

While viewing the MIR PDF Report, you are required to right click on the PDF to invoke the select tool and view additional data in the each field. Additional data can be viewed by horizontally scrolling. For fields which are identified as grow fields and multiline text fields, additional data can be viewed by invoking the scroll bar by selecting the select tool. Additionally complete data is for all the Grow fields is printed at the end of the report as additional pages.

Electronic Signatures for MIR PDF reports have to be done outside the system, however EC recommends that Manufacturers do not require electronically signed MIR Reports Submission.

#### MIR XML:

MIR XML generated from Oracle Argus Safety is viewed in MIR Viewer, XML View is generated by default.



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## Frequently Asked Questions

- How is MIR reporting handled for Non-serious Reportable Incidents?
- How are MIR XML and MIR PDF transmitted together to the same destination?
- Does Oracle Argus Safety generate electronically signed non-editable MIR PDF?
- Is Similar Incident Data automatically populated by the system?
- How to overcome population of non-existing countries such as "World" in the Other Countries field of Section 2.5 Market distribution of device in a MIR Report?
- Are IMDRF Codes auto populated for legacy cases after upgrade to Oracle Argus Safety 8.2.2?
- If obsolete FDA Codes are used in the legacy cases, how is the recoding of such cases handled?
- Are IMDRF codes automatically derived from MedDRA PT for Clinical Signs (Annex E)?
- If earlier version of MIR EU Device Vigilance report in Oracle Argus Safety was used to send out the Initial Report, can the follow-up or Final Report be sent on the New MIR Report format?
- How is Incident Classification handled in the new MIR Report?
- Are FDA Coding and IMDRF done separately for Device Problem and Evaluation/ Investigation Code Information?
- How does the system determine the MIR Report type?
- When I generate an MIR Report generated by Oracle Argus Safety, would it be acceptable by NCAs or NBs?
- If multiple events in a case form are coded with IMDRF Clinical Sign Codes, which events are considered for clinical sign population in Section 3.3, Patient information, IMDRF Clinical signs, symptoms, and conditions codes (Annex E)?
- · Can MIR XML be transmitted over email?
- If the MIR Report submitter is a Local Company Representative, what would be the required configuration?
- How are partial dates handled in MIR?

## How is MIR reporting handled for Non-serious Reportable Incidents?

The out-of-the-box MIR Profile requires at least one Serious related event to populate the Incident Start and End Dates. In order to achieve reporting of Non-Serious Reportable Incidents, the following is recommended:

- Addition of a User Defined Field in the Event Tab to indicate if the Event is a Reportable Malfunction (Yes/No). This field would indicate that the Event was not serious. However it would be a Reportable Malfunction.
- Configuration of Health Impact Coding with IMDRF Code F26 Indicating that there
  was no Health Impact. This ensures the Incident Classification in the MIR Report
  would be Other Reportable Incidents.
- Customization of Message Profile, by updating the SQL for Admin info block.
- Reporting Rules configured to schedule MIR Report based on the UDF added.

## How are MIR XML and MIR PDF transmitted together to the same destination?

There can be only one MIR report format per transmission and is based on the configuration of the MIR Report Type in the Reporting Destination (RD). It is recommended to configure Two Reporting Destination Page 19 of 22 with one of the RD having the MIR Report Type as PDF and other having XML. Corresponding Reporting Rules should be updated for each Reporting Destination. This will ensure that there can be two MIR Transmission emails reaching the same configured Reporting destination configured.

## Does Oracle Argus Safety generate electronically signed non-editable MIR PDF?

MIR PDF generated by Oracle Argus Safety is a non-editable PDF report and EC had confirmed that NCAs do not require the electronic signatures updated from device manufacturers.

## Is Similar Incident Data automatically populated by the system?

Initial version of the MIR support in Oracle Argus Safety does not support autocalculations as there is no common calculation logic followed by the manufacturers. Currently each manufacturer follows different logic. EC had not provided any guidance on Similar Incident Analysis.

How to overcome population of non-existing countries such as "World" in the Other Countries field of Section 2.5 Market distribution of device in a MIR Report?

It is recommended to customize the Message Profile-EC MIR Message Template, by updating the SQL for device\_info block to populate Tag **otherCountries** with name of the countries with a valid ISO Country code.



## Are IMDRF Codes auto populated for legacy cases after upgrade to Oracle Argus Safety 8.2.2?

For Legacy cases, the system is not expected to populate IMDRF codes based on FDA codes. However you are expected to recode the Medical Device Information and Evaluation/Investigation Information.

## If obsolete FDA Codes are used in the legacy cases, how is the recoding of such cases handled?

If an obsolete FDA code is used in the case, the decode values will not be displayed for patient problem, device problem and Evaluation code information, and you are expected to recode such data against the new repository upon upgrade to Oracle Argus Safety 8.2.2.

## Are IMDRF codes automatically derived from MedDRA PT for Clinical Signs (Annex E)?

After Event encoding, you are expected to manually code the Clinical Signs by using the Look up provided. The system autopopulates the MedDRA LLT Term of the Event in the Term Text Box of the lookup and you will have to select the desired Row, containing IMDRF Code, MedDRA LLT Code, MedDRA LLT Term, Clinical Sign and Page 20 of 22 Definition. Upon value selection, the system will populate the record in the **Event Tab > IMDRF Code**.

If earlier version of MIR – EU Device Vigilance report in Oracle Argus Safety was used to send out the Initial Report, can the follow-up or Final Report be sent on the New MIR Report format?

It is expected that the MIR report cycle of the earlier version of MIR – EU Device Vigilance report is completed. The new MIR report type logic does not consider reports sent out using old MIR form and System will send out the Initial MIR using the new MIR form, even if there was a previously submitted MIR in the old format.

## How is Incident Classification handled in the new MIR Report?

Classification of Incidents is based on Health Impact Coding in **Case Form > Product > Device > Health Impact Information**.



## Are FDA Coding and IMDRF done separately for Device Problem and Evaluation/Investigation Code Information?

New CFG\_FDA\_IMDRF\_CODES repository supports harmonized IMDRF and FDA Codes for Medical Device Problem (Annex A) and Evaluation/Investigation Codes (Annex B, C, D). When you use the lookup and select a record, the system stores FDA Code and corresponding IMDRF code, ensuring Common Coding for the IMDRF and FDA Codes.

### How does the system determine the MIR Report type?

MIR Report is determined based on the field **MIR Report Type** in the **Case Form** > **EU CA Device** dialog.

## When I generate an MIR Report generated by Oracle Argus Safety, would it be acceptable by NCAs or NBs?

The MIR Report generated by Oracle Argus Safety is validated against the XSDs provided by ECs.

The system performs validation checks based on conformance rules of the EC and shall list all the failing validations in the MIR Validation Report. Upon updating the case data to satisfy the validation rule, the system will then generate the MIR Report.

If multiple events in a case form are coded with IMDRF Clinical Sign Codes, which events are considered for clinical sign population in Section 3.3, Patient information, IMDRF Clinical signs, symptoms, and conditions codes (Annex E)?

System picks the first six events in the case form that has the IMDRF Code coded for Clinical Signs.

#### Can MIR XML be transmitted over email?

Yes, MIR XML can be transmitted over email. The report type considered for transmission is configured in **Reporting Destination** > **EDI** Tab > **MIR Report Format**. If you configure the XML option, the system will send out an email to the recipient with the MIR XML as attachment.



## If the MIR Report submitter is a Local Company Representative, what would be the required configuration?

The submitter of the MIR Report is based on the Contact Type configured in the Reporting Destination. In order to ensure that the Submitter of the Report is **Local Company Representative**, please follow these steps:

- Select both Importer, and Distributor in the Contact Type of the Reporting Destination.
- Customize the Message Profile-EC MIR Message Template, by updating the SQL for admin\_info block to populate the statusReporter tag with Others and the reporterOtherText tag with Local Company Representative, if Contact Type is configured with both Importer and Distributor.

### How are partial dates handled in MIR?

Based on the Q&A document released and further communication received from EC, Member State Authorities are to a large extent not in favor of the use of partial dates, therefore it is recommended to use full dates in all the date fields of the MIR Report. However, in Oracle Argus Safety OOTB EC MIR Message profile, partial dates are supported with the following logic:

If Date format:-Feb-2020: Date to be Transmitted: 2020-02-01 - Transmit the First Day of the Month if the Partial Date has Month/Year

If Date format:-???-2020: Date to be Transmitted: 2020-01-01 - Transmit the First Day of the Year if the Partial Date has Year.

