PHARMACOVIGILANCE

Instructions for Authorization Holders Related to Letters to Healthcare Professionals (DHPC)

Version 3, December 2021

A letter to *Direct Healthcare Professional Communication* (DHPC) is information that ensures the safe and effective use of medicines and is sent to healthcare professionals by the Agency for Medicinal Products and Medical Devices (HALMED) or the marketing authorization holder. The purpose of the Letter to Healthcare Professionals is to inform them about important safety issues and provide them with instructions on how to take certain measures or change the way certain medicines are handled. The letter to healthcare professionals must not contain any form of advertising of the drug.

HALMED may independently send a Letter or ask the Marketing Authorization Holder to do so in any situation it deems necessary for the continued safe and effective use of the medicine. HALMED publishes Letters to Healthcare Professionals on its website, ie here .

The holder of the authorization and HALMED are obliged to follow the valid version of Module XV of the Guideline on Good Pharmacovigilance Practices (*Module XV - Safety communication* ; GVP XV) during the preparation and distribution of the Letter .

In accordance with Art. 40 of the Ordinance on Pharmacovigilance (Official Gazette 83/13), the holder of the authorization is obliged to reach an agreement with HALMED on the content of the Letter, the distribution list, the communication plan and the deadline for the distribution of the Letter.

Letters are sent for medicines that are on the market in the Republic of Croatia.

Cases in which the Letter is sent to health professionals

A letter to healthcare professionals is sent when there is a need for immediate action or a change in common practice related to a particular drug in the following cases:

- suspension of the suspension or revocation of the marketing authorization for safety reasons
- important change in the use of the drug due to limitation of the indication, new contraindications or changes in the recommended dose for safety reasons
- limited availability of the drug or complete cessation of the supply of the drug with potential adverse effects on health care for patients.

The need to distribute the Scriptures should also be considered in the following cases:

- a new significant warning or precaution in the product information
- new data indicating a hitherto unknown risk, ie a change in the severity or frequency of a previously known risk
- new evidence that the drug is not effective to the extent previously considered effective
- new recommendations for the prevention or treatment of side effects, ie avoidance of drug abuse or medication errors associated with the use of the drug
- an ongoing assessment of a significant potential risk for which the available data at a given time are insufficient to take regulatory action; in this case, the Letter should refer to the careful monitoring of the safety issue in clinical practice and encourage the reporting of adverse reactions and, where possible, provide information on how to minimize potential risk.

Making a Letter to Healthcare Professionals

When drafting the Letter to Healthcare Professionals, authorization holders should use the template available here (version 3, December 2021) .

The text marked in green in the template is an explanation of individual parts of the template and should be deleted when drafting the Letter, while the text in <> brackets is an instruction on the data to be included in a particular part of the template according to applicability.

Applying for Approval of the Letter

Documentation related to the procedure for approving the Letter is received electronically - via CESP or e-mail to DHPC@halmed.hr . If the dossier is submitted through CESP, it should be **clearly indicated** that this is a request for approval of the Letter.

Authorization holders shall submit to HALMED a request for approval of the Letter by submitting in electronic form :

1. cover letter or request for approval of the Letter to healthcare professionals signed by the local responsible person for pharmacovigilance in the Republic of Croatia, which explains the sending of the Letter to healthcare professionals and proposes the method of distribution
2. proposal of the Letter to health workers in the Croatian language
3. the text of the Letter to Healthcare Professionals in English, if applicable
4. communication plan
5. distribution list or list of recipients of the Letter to healthcare professionals.

If, due to national specificities, the proposed content of the Letter or the Distribution List differs from those approved at EU level, this should be explained in the cover letter.

Application approval process

HALMED will electronically submit a registered copy of the cover letter (request) for approval (local) to the person responsible for pharmacovigilance of the holder of the marketing authorization holder in the Republic of Croatia within 5 working days.

HALMED will deliver the approved text of the Letter by e-mail within the deadline set by the communication plan, if applicable. HALMED does not issue a paper Notice of Approval of the Letter, but an e-mail with the approved text of the Letter is considered the end of the approval process.

The holder of the approval is obliged to submit a scan of the signed letter (in color, up to 200 KB in size) to the address DHPC@halmed.hr no later than one day before the day of distribution. After receiving the PDF scan, the Letter is published on the Letters to Healthcare Professionals website and in the HALMED Medicinal Products Database , in addition to a summary of product characteristics and package leaflet, and attached to the dossier.

Distribution of Letters

For the purposes of pharmacovigilance inspection, the marketing authorization holder is obliged to archive all communication with HALMED, as well as proof of distribution of the Letter.

In case of difficulties in the distribution of the Letter, it is necessary to inform HALMED via the e-mail address DHPC@halmed.hr .

Use specially marked envelopes

In order to improve the recognizability of the Scriptures, when the Scriptures are sent by post, white envelopes with a stamp prepared by HALMED on the front must be used. This stamp, measuring 7.7 x 5 cm and written in Calibri 26 in the middle and Calibri 8 in the footer, is available in several different formats here .

Envelopes may not bear other logos, including the logo of the marketing authorization holder and / or the medicinal product.

If requested by the postal service provider, the envelope may exceptionally bear information on the sender without the logo.

Distribution by e-mail

Distribution of the Letter by e-mail is possible only if the specified e-mail is sent instead of the holder of the authorization by the appropriate professional organization of health professionals (eg chamber, society, association), if applicable. This must be clearly defined in the cover letter (request).

The stated possibility of distribution does not oblige the organization of healthcare professionals to implement it instead of the holder of the authorization, and HALMED does not take responsibility for possible costs incurred in the said procedure.

Preparation and sending of the Letter in front of several holders of approval

HALMED encourages the development of a joint Letter to healthcare professionals for medicines containing the same active substance / combination of active substances. HALMED will request (local) persons responsible for pharmacovigilance of the marketing authorization holder in the Republic of Croatia by e-mail to jointly prepare and distribute one joint Letter. The Joint Letter will be signed by the responsible persons of all authorization holders involved in the preparation of the letter, as indicated in the template.

Such a procedure applies to situations involving two or more authorization holders. In such situations, co-operation between authorization holders is expected, with support from HALMED. Communication between the authorization holder and HALMED takes place through one authorization holder selected by the participant in the procedure as a contact person if five or more authorization holders participate in the procedure. If up to five authorization holders are involved in the procedure, HALMED communicates directly with all participants in the procedure.

Each holder of the authorization should individually submit to HALMED a cover letter or a request for approval of the Letter to healthcare professionals signed by the local responsible person for pharmacovigilance in the Republic of Croatia.

Joint distribution of the Letter implies that the marketing authorization holders may submit to HALMED for approval a distribution list in sequences (each holder one sequence of the distribution list), where each holder is responsible for distributing the Letter only to those healthcare professionals included in the HALMED sequence. in.

Exemption from the obligation to send a joint letter

The authorization holder may request an exemption from the obligation to send the Letter only in the process of approving the joint Letter.

HALMED grants this exemption upon receipt of an individual request for exemption, and only if the medicinal product that has the obligation to send the Letter will not be placed on the market in the Republic of Croatia within three months from the intended date of distribution.

This exemption does not constitute a complete exemption from the sending of the Letter. The Marketing Authorization Holder is obliged to contact HALMED at least 15 days before placing the medicinal product on the market in order to obtain information on whether there is still an obligation to send the Letter.

The request for exemption is submitted by e-mail to DHPC@halmed.hr and cannot be obtained by telephone.

Contact

For questions or information related to the Letter to Healthcare Professionals, the authorization holders may contact DHPC@halmed.hr .