

RESEARCH REPORT

Report on the assessment of the quality management system of the

Medicines Evaluation Board (MEB)

regarding the requirements of ISO 9001:2008, based on the Certiked Model 2009

The review was conducted on

7 and 8 February 2011

by Dr A.H. Roozendaal CMC MCM (team leader) and

C.G. Tegelberg (assessor)

**The recovery assessment was conducted on 29 June 2011 by Dr A. H. Roozendaal
CMC MCM (team leader)**

Contents of the report

Identification	2
Findings	4
Advice	7
Appendix: Follow-up.....	8
Appendix: Assessment.....	10
Appendix: Legend	21
Appendix: Documents	22
Appendix: Programme	25

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on behalf of the above,

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Certiked
13 July 2011

Identification

Medicines Evaluation Board (MEB)
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Branches: Wageningen (Veterinary Medicinal Products Unit), Groningen and Nijmegen (clinical assessment teams consisting of clinicians who work for the MEB on a part-time or secondment contract).

Administrator in charge of quality: A.A.W. Kalis, Executive Director of the MEB.
Quality Assurance Officer: M.A. (Martijn) de Coninck (+31 (0)70 - 356 7455, ma.d.coninck@cbg-meb.nl).

Scope

Categories of the knowledge-intensive service of the MEB that are within the scope of the certificate are:

- The evaluation (safety, efficacy and quality) and authorisation of medicinal products for human use.
- The monitoring of medicinal products for human use (human pharmacovigilance).
- The provision of scientific advice to the industry regarding the development of medicinal products for human use.
- The evaluation of the safety of new foods for human use.
- The assessment, authorisation and monitoring of medicinal products for veterinary use.
- The assessment and issuing of licenses for preparing and delivering veterinary medicinal products
- The assessment of animal feed additives, diet feeds and bioproteins.

The organisation has had an ISO 9001 certificate since 23 March 2006.
This certificate expires on 23 March 2012.

Studies

Reassessment	February 2009
Case-control study 1	February 2010
Recovery assessment	26 July 2010
Case-control study 2	7 and 8 February 2011
Recovery assessment	29 June 2011
The next study is a reassessment	January 2012

Context

The Medicines Evaluation Board (MEB) is the Dutch authority for evaluating and monitoring the efficacy, safety and quality of human and veterinary medicinal products. The MEB also evaluates the safety of novel foods. The MEB comes under the Ministry of Health, Welfare and Sports (VWS). The processes of the MEB are strictly regulated by national and international laws and regulations which impose the precisereview and handling of applications for obtaining a marketing authorisation for new medicinal products or variations of existing medicinal products.

The international context for these tasks is becoming increasingly more important. The Heads of Management Agencies have laid down a joint Strategy Paper 2011-2015. This document outlines the major developments and measures in the international context. For the MEB, this means bringing the outside world in and vice versa. Another external development is the new legislation regarding pharmacovigilance which is expected to have major consequences for the MEB's processes. In addition, the cooperation with the various European Committees as well as organisations closely related to the MEB, like Lareb and the Dutch Healthcare Inspectorate (IGZ), will also change. An internal and external task force has been appointed to prepare and work out the details.

There have also been various internal developments. The smart building, smart working principle will be implemented. It is expected that the MEB will move to the new location in Utrecht on 1 December 2011. The preparation for this is done during the so-called Phase 3 of the U Move project. Action will be taken from three perspectives: Physical (buildings), Mental (people) and Virtual (infrastructure). Next year will feature much more emphasis on output-driven processes and performance agreements than was previously the case.

Internally, the Scientific Programme Management Department (PBW) is becoming more important body with respect to the professionalisation of employees and the cooperation with external experts. An Education Committee is now being formed within the PBW to determine the technical competencies for the various core jobs and set up the training programmes that train these competencies.

A number of other issues are being worked on, including the 'Meet the timetables project, known as the DOT project, and the screening of all staff for the MEB's current and future needs. These topics are also discussed elsewhere in this report.

In 2011, part of the National Institute for Public Health and the Environment (RIVM) will be incorporated into the MEB. At first, this will involve an organisational transfer of roughly 40 FTEs. For the time being, these employees will continue working as a MEB organisational unit at their workplace in Bilthoven. However, these employees in Bilthoven will also move in to the new building Utrecht.

One of the most important themes within the MEB will be feeling responsible and taking responsibility accordingly

Finally, a joint project of the MEB and the ministry of Health dealing with the governance of the MEB, will be implemented

This is the report of the recovery assessment. It is based on the report of the second case-control study. New information related to that study appears in de text in bold.

Findings

The organisation has a great awareness of its position. Where possible, it participates proactively in all kinds of international committees. The annual plans make a good impression and are used by the management. Just as previous assessments found, the primary process is well-organised. This also applies to the various monitoring tools, the most important of which are ICI and Sumatra. These are continuously modified based on new releases, and the ongoing development is now moving in the direction of a Business Intelligence System.

Preparations for the smart building smart working principles are successfully . . This due to the fact that the project is divided into three perspectives (Physical, Mental and Virtual) and then into a large number of activity plans. All projects are managed in the same way, which promotes transparency and facilitates progress monitoring. As part of the smart building smart working project, experiments have already been conducted with pilot groups which are working more and more from home (i.e. independent of time and place). Employees find those experiments very useful to gain experience.

A number of steps have been implemented in the DOT project, e.g. the start of the process (receipt) and the end of the process (decision making). The assessment process itself will be addressed in 2011.

The influence of the relatively new Scientific Programme Management department is increasing, in part because the board acts as a liaison between the MEB and other research institutions . This applies in particular to Human Medicines. Management reports show that employee absenteeism and turnover is very low which is remarkable for an organisation in transition.

The organisation is characterised by transparency on all fronts, both externally and certainly also internally.

As pointed out in the Follow-up appendix, one of the three comments in the previous study has been adequately resolved, one has been upgraded to a shortcoming and one remains a comment.

The following topics have been properly dealt with by the MEB (showing in brackets the Certiked facet and the ISO section to which the remark refers):

<i>Finding</i>	<i>The organisations involves its most important stakeholders in its planning (B1, ISO 5.2).</i>
Explanation	The planning and control cycle and the management review have been integrated. The management review results in the 2011 annual plan after the results of the complete management review have been presented to the ministry.
<i>Finding</i>	<i>The MEB manages its improvement projects well, including as many elements as possible from the PDCA cycle (P4, ISO 8.1).</i>
Explanation	This pertains to the initiation of projects, the supporting role of the programme management, the active participation of the Programme Board in steering committees, the use of formats, implementing follow-up and evaluations. This usually involves a closed PDCA cycle. Examples include the issuing of ICI releases, the smart building smart working approach (U Move project) and corresponding subprojects and the Evaluation National Scientific Advice. Projects can be easily monitored with the help of MS Projects.

Finding *The internal s training programme for clinical assessors has been redesigned in an iterative process with those directly involved (M2, ISO6.2.2).*

Explanation The evaluation took place in close consultation between the Scientific Programme Board and the relevant departments. There is a structural evaluation of the modules and periodic progress reviews. Education coordinators from the relevant departments have been appointed to deliver the casuistry and there is constant coordination with HRM-O.

Finding *A new implemented approach is effective for conducting the screening of all staff for the MEB's current and future needs (M3, ISO 6.2.2).*

Explanation The group of Regulatory Project Officers (RPOs) has been reviewed. The new approach involves the direct management collecting input on the individual employees based on a fixed format. HRM-O makes an overall presentation of the findings. The results are discussed and the developing themes are outlined. HRM-O draws up a concluding/evaluating report. The other groups are now planned.

Improvements still need to be made with respect to a number of other topics. This pertains to the following comments (showing in brackets the Certiked facet and the ISO section to which the remark refers):

Finding *There is no audit plan in which the complete quality management system is periodically, methodically and systematically assessed (O3, ISO 8.2.2).*

Explanation An overview of the audited processes and activities in the last five years is now used for the planning. A brainstorm meeting with relevant internal stakeholders is also conducted. The internal audit planning is approved during the operational meeting. Generally, there is no checkwhether all ISO-topics have been covered.

Finding *There is no structural evaluation of the measures taken with respect to risk management in the primary process (P1, ISO 7.2.2).*

Explanation The importance risk management is increasing and that there is certainly more focus internally on the topic of risk. Measures are initiated by the programme management with respect to designating the risks and taking control measures. However, no evaluation of the effectiveness of the measures takes place with the aim of learning for project phases or future projects that have yet to be carried out. A risk log is now being created for projects related to U Move in order to record and evaluate risks and to outline potential action for avoiding or covering risks.

Finding *The policy on contracting external experts has been formalized, but has not been sufficiently implemented (H.2, ISO 7.4.2).*

Explanation The policy concerning working with external experts has been formalized. It outlines the responsibilities of the Scientific Programme Board, on the one hand, and the primary process departments, on the other. The qualification criteria have been set, as well as the possible contract forms for cooperation. The contract register and a separate agreement register have been set up. The periodic evaluations are now planned, but are not yet systematically carried out according to the fixed format. It is striking that the document used for the evaluation of contracts is focussing only on: the external expert's view of the MEB. The document does not yet contain the MEB's view of the expert.

In the next study, these criticisms will be assessed with respect to the follow-up regarding the findings and the effect of these measures.

The following critical finding has been observed (showing in brackets the Certiked facet and the ISO section to which the remark refers):

Finding	The management review performed is incomplete because the customer result area has not been worked out sufficiently. (B3, ISO 5.6.2.)
Explanation	Because some of the stakeholder data is lacking, no statement can be made about the effectiveness of the quality management system from the stakeholders' perspective based on factual information.
Solution approach	The MEB chooses the following solution approach: <ol style="list-style-type: none">1. The implementation of a structural customer survey.2. The addition of the analysis in table form as an addendum to the 2010 Management Review.
Cause analysis	Up until now, the quality assurance officer used to prepare the stakeholder management review. However, the quality assurance officer is not always aware of all the results from the meetings with the various stakeholders. In the future, line management will be more involved concerning this part of the management review, including the writing of the document that serves as input for the stakeholders part of the management review (see Measure).
Measure	The MEB has chosen a combination of a quantitative and qualitative assessment. A comprehensive analysis of stakeholder satisfaction, based on minutes and other feedback, has been conducted by line management. The categories of Human, Veterinary and Botanicals & Novel Foods were examined. There was also a thorough review of the feedback from the Board of the MEB. Indicators were designated for each category. The management made an assessment for each category and, where necessary, specified corrective and preventive measures. The overall reporting has been determined and added to the 2011 annual plan. Also, the design process for a tool for the quantitative measurement of stakeholders satisfaction has been completed. In this case, respondents are applicants for marketing authorisations. This tool was developed in consultation with the various parties concerned. A random check is now performed each month and results are generated for the PT groups, the Veterinary Medicinal Products Unit, the Botanicals & Novel Foods and the Information Processing unit. The tool has been operational since June 2011 and a first report has been published.. The results will be included in the next management review.
Conclusion	The critical finding has been adequately resolved.

By 24 February 2011, at the latest, the organisation will submit an action plan to the team leader that includes an analysis of the cause of the critical finding and a proposal to solve the critical finding. By July 2011, at the latest, the team leader will conduct a recovery assessment at the office of Certiked. The shortcoming will be assessed with respect to the cause analysis, determination of the scope, actions undertaken and the effect of these actions.

It has been agreed upon with the management that, in addition to the regular topics, next year the ISO check will pay special attention to:

- The evaluation of the additional measures regarding the implementation of the peer reviews.
- The elaboration of the topic concerning employees in the management review (based in part on the overall analyses on the performance interviews held).
- The evaluation of the 'Timetables met' project (DOT project).
- A vision of result-oriented management, including a new Business Intelligence Tool which is being developed.
- The developments within the Education Committee with respect to designating the minimum knowledge and skill requirements for MEB employees.
- The progress of the task force with respect to the new pharmacovigilance legislation.

Advice

Based on the conclusions, the assessment team expresses confidence in the sound functioning of the quality management system in place at this organisation. For this reason, the assessment team recommends the Board of Certiked to renew the certificate .

The next study will be a reassessment that will take place in January 2012.

Appendix: Follow-up

The case-control study conducted in February 2010 made three comments. These comments, including the effect of the measures taken, appear below.

Finding	<i>Insufficient attention is given to the topic of Customers in management review (B.3, ISO 5.6.1)</i>
Explanation	There are many contacts with 'customers', such as during the MEB's annual days, but the information gathered is not sufficiently used as input (required by the standard) on an abstracted level for the implementation of the management review. Consequently, the MEB cannot comment on the adequate functioning of the quality management system. The most recent Stakeholder survey was performed in 2008.
Measure	A tool has been developed for measuring 'customer' satisfaction immediately after the applicant has received the MEB's decision on the application for a marketing authorisation. The survey is about issues such as the contactability of the MEB, the understandability of correspondence with the MEB and the MEB's compliance with the statutory periods. The MEB is independent with respect to

the decision making. When an applicant disagrees with a decision, an objection or appeal procedure can be started. The surveytool is not yet operational. The other stakeholders are mentioned in the management review, but still no performance indicators have been designated for the most important stakeholders with respect to stakeholder satisfaction. However, implicit information is available from the reports of the various meetings.

Because the stakeholder data is lacking, no statement can be made about the effectiveness of the quality management system from the customers' perspective based on factual information.

Conclusion	The finding has not been resolved and has been upgraded to a critical finding (see Findings).
Finding	<i>The review of the data entered by the Information Processing department is still insufficiently used to implement structural improvements in this process (P.3, ISO 8.5.3).</i>
Explanation	A 100% check is performed by a colleague for every application entered in ICI by an IP department employee. Findings are recorded in a review report. If necessary, input is corrected. A large number of cases per year (over 15,000 main cases per year) are entered in the ICI dBase. However, no analysis is currently performed on the review reports, based on which measures could be taken to improve the work process. The IP department is aware of this, but states that the MEB does not consider this a priority. As this is not an issue raised in the previous study, it is considered a new finding.
Measure	The organisation has performed a comprehensive study, partly on account of this finding. This involved determining the error percentage at three different moments. Based on the analysis, various measures have been taken to improve the work processes at acceptable costs, including a 100% check by a colleague for all new issues, feedback via the IP service box, discussion during regular meetings, the assignment of input authorisations, training and development tracks and the monitoring of data quality by FD.
Conclusion	This finding has been adequately resolved.
Finding	<i>No structural assessments take place with partners in the academic network based on the agreed upon covenant (H.2, ISO 7.2.1).</i>
Explanation	The MEB selects external partners, such as assessors, for the implementation of its plans and activities. Limited use is made of clear criteria during the selection (beforehand) and assessment (afterwards) of these partners. Criteria do apply to the selection process, such as a ban on a conflict of interest. However, there is still no structural evaluation of partner performance.
Measure	See the section on Findings. The periodic evaluations are now planned, but are not yet systematically carried out according to a fixed format. It is striking that the document used for the evaluation of contracts is focussing only on: the external expert's view of the MEB. The document does not yet contain the MEB's view of the expert.
Conclusion	The finding has only been partially resolved and has once again been rated as a criticism.