

2. The CIOMS I form

The following concerns adverse events that occur outside the United States. For reporting these AEs to the FDA, drug companies can use either an international form (CIOMS I form) or FDA Form 3500A (194). However, for adverse events that occur within the United States, drug companies must use FDA Form 3500A, and must not use the CIOMS I form. The CIOMS I form is available in electronic format (195).

There is only the CIOMS I form (there do not exist CIOMS II forms or CIOMS III forms). The CIOMS I form is used for both pre- and post-marketing reporting. Reporting is mandatory only for the Marketing Authorization Holder (MAH), but voluntary for consumers and physicians (196). In Great Britain, the MHRA will accept information filled out on a CIOMS I form by a member of public or health care professional, as long as it has the four minimum reporting requirements: a patient identifier, suspect drug, suspect reaction, and reporter details; however, in actual practice, this route for reporting safety issues in Great Britain is rarely used (197).

Investigators need to be aware of different reporting requirements in the United States and in Europe. According to one commentator, in Europe, it is the case that regulators accept the ICH concept that manufacturers should report only those events that the reporting physician or the manufacturer believe have a causal relationship with a drug (198). However, the United States has been slow to adopt these standards, and prefers companies to report all adverse experiences, irrespective of the likelihood of a causal relationship.

b. Post-marketing surveillance

Post-marketing safety reporting to the FDA can use a format mandated by the FDA (Periodic Adverse Drug Experience Report; PADER) or, with permission, can utilize the PSUR format (199). The Periodic Safety Update Report (PSUR) provides an update of worldwide safety experiences of drugs. With the PSUR submission, the sponsor summarizes newly obtained information and evaluates the risk-benefit profile of the drug (200). PSURs present the worldwide safety experience of a medicinal product at defined times post-authorization, in order to report new safety information

¹⁹⁴ U.S. Dept. of Health and Human Services. Food and Drug Administration. Guidance for Industry. Postmarketing safety reporting for human drug and biological products including vaccines. March 2001.

¹⁹⁵ Drug Safety Reporting Duties in Switzerland. Swissmedic, Hallerstrasse 7, CH-300 Bern 9 (document dated May 13, 2009).

¹⁹⁶ Andrews EB. E-mail of April 1, 2011.

¹⁹⁷ Heffer S. E-mail of April 1, 2011.

¹⁹⁸ Castle GH, Kelly B. Global harmonization is not all that global: divergent approaches in drug safety. *Food and Drug Law J.* 2008;63:601.

¹⁹⁹ U.S. Department of Health and Human Services. Food and Drug Administration. Guidance for Industry. Providing regulatory submissions in electronic format – postmarketing periodic adverse drug experience reports. June 2003 (16 pages).

²⁰⁰ Pfizer. What are cumulative reports of safety? Version 1, August 2008 (4 pages).