1 Original Manuscript

2 Title: Antiretroviral Adverse Drug Reactions Pharmacovigilance in Harare City,

3 Zimbabwe, 2017

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15 Abstract

Introduction: Key to pharmacovigilance is spontaneously reporting all Adverse Drug
Reactions (ADR) during post-market surveillance. This facilitates identification and
evaluation of previously unreported ADR's, acknowledging the trade-off between
benefits and potential harm of medications. Only 41% ADR's documented in Harare
city clinical records for January to December 2016 were reported to Medicines
Control Authority of Zimbabwe (MCAZ). We investigated reasons contributing to

21 Control Authority of Zimbaowe (MCAZ). we investigated rea 22 underreporting of ADR's in Harare city.

23

Methods: A descriptive cross-sectional study and the updated Centers for Disease
Control (CDC) guided surveillance evaluation was conducted. Two hospitals were
purposively included. Seventeen health facilities and 52 health workers were
randomly selected. Interviewer-administered questionnaires, key informant interviews
and WHO pharmacovigilance checklists were used to collect data. Likert scales were
applied to draw inferences and Epi info 7 used to generate frequencies and

- 30 proportions.
- 31

32 **Results:** Of the 52 participants, 32 (61.5%) distinguished the ADR defining criteria. 33 Twenty-nine (55.8%) knew system's purpose whilst 28 (53.8%) knew the reporting 34 process. Knowledge scored average on the 5-point-Likert scale. Thirty-eight (73.1%) 35 participants identified ADR's following client complaints and nine (1.3%) enquired 36 clients' medication response. Forty-six (88.5%) cited non-feedback from MCAZ for 37 underreporting. Inadequate ADR identification skills were cited by 21 (40.4%) 38 participants. Reporting forms were available in five (26.3%) facilities and reports 39 were generated from hospitals only. Forty-two (90.6%) clinicians made therapeutic 40 decisions from ADR's. Averaged usefulness score was 4, on the 5-point-Likert scale. 41 All 642 generated signals were committed to Vigiflow by MCAZ, reflecting a case 42 detection rate of 4/100 000. Data quality was 0.75-1.0 (WHO) and all reports were 43 causally assessed.

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45 Conclusion: The pharmacovigilance system was useful, simple, and acceptable
46 despite being unstable, not representative and not sensitive. It was threatened by
47 suboptimal health worker knowledge, weak detection strategies and referral policy
48 preventing ADR identification by person place and time. Revisiting local policy,
49 advocacy, communication and health worker orientation might improve

- 50 pharmacovigilance performance in Harare city.
- 51

Keywords: Pharmacovigilance, Postmarket Product Surveillance, Adverse drug
 reaction, Antiretroviral agents

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57 Introduction

58	Pharmacovigilance (PV) is the practice of monitoring the effects of medical drugs
59	after they have been licensed for use, in order to identify and evaluate previously
60	unreported adverse drug events (ADE) and reactions (ADR) (1). This is in recognition
61	of the trade-off between the benefits and the potential harm of all medications (2).
62	Rapidly increasing antiretroviral therapy (ART) access globally, has transformed HIV
63	infection into a chronic, manageable condition with prolonged survival times (3).
64	Consistent with typical chronic therapy, drug-related toxicities remain a major
65	challenge in resource-constrained settings due to a limited formulary for mitigation
66	and inadequately trained personnel (4). Treatment-limiting drug toxicities are
67	resulting in an added layer of complexity in the management of HIV by impairing
68	patient adherence to treatment, leading to inferior clinical outcomes and higher cost to
69	the public health system (5).
70	The Medicines Control Authority of Zimbabwe (MCAZ) which houses the National
71	Pharmacovigilance Centre, derives its mandate from the Medicines and Allied
72	Substances Control Act (MASCA), Chapter 15:03, enacted in 1997 (6). This
73	legislation provides the impetus for MCAZ's stewardship role in regard to medicines
74	licensure and regulation in the country. The main thrust being ensuring improved
75	patient care and safety during medical and paramedical interventions, thereby
76	improving public health and safety in relation to the use of medicines. In addition, the
77	system promotes understanding, education and clinical training in pharmacovigilance
78	and its effective communication to the public (7). The operations of the Centre are
79	guided by WHO guidelines for setting up and running a national pharmacovigilance
80	Centre. In this regard, the Zimbabwe National Pharmacovigilance Policy and
81	Guidelines serve as a handbook for pharmacovigilance activities in the country (8).

82 The bedrock of pharmacovigilance systems, that aim to improve medicinal products 83 safety, is prompt, spontaneous reporting of adverse drug reactions (ADRs) as a key 84 step to their mitigation as well as updating the drug information database (9–11). It is, 85 therefore, a mandatory requirement for health care providers to timely report all 86 suspected and confirmed ADRs. This is particularly imperative in Zimbabwe, where 87 the treat all strategy is being implemented, since June 2016, and has resulted in the 88 number of people on HIV treatment rapidly increasing (12). 89 A preliminary review of ADR data for ARV's from Harare City which was reported 90 through the MCAZ and through Opportunistic Infections (OI) records, captured 91 between 01 January and 31 December 2016 was conducted. A 41% discrepancy was 92 discovered in these two reporting systems, with more cases appearing in OI records 93 than what was reported to MCAZ (6). This indicated poor reporting practices that 94 impede accurate quantification of the prevalence of ADR'S. Failure to detect and 95 report adverse drug reactions compromises patient safety and results in missed 96 opportunities to update drug safety profiles. It is within this background that we 97 evaluated the ADR surveillance system in Harare City in order to identify the reasons 98 for underreporting and recommend solutions. 99 Figure 1: The ARV ADR Surveillance Flow Diagram

100 When an ADR case is suspected or confirmed, an in-house reference number is

- 101 assigned. The data collected and entered into the standard reporting form should be
- 102 checked for completeness. Additional information and clarifications should be
- solicited from the reporter before the report is filed. Once done, a completed form
- should be submitted to MCAZ within 14 days for spontaneous reporting (SR).
- 105 Meanwhile, corrective interventions will be of course. At MCAZ, received reports
- are transferred to the MCAZ reporting form to be tabulated for causality assessment at

107	the next seating of the pharmacovigilance and clinical trials (PVCT) meeting. The
108	causality assessment process involves analysis of the reaction against a set of key
109	aspects that include the strength of the association, consistency of the observed
110	evidence, temporality, dose-response and identification of possible confounders
111	[13]. The recommendations derived from this meeting are then implemented, which
112	may be a request for further information where clarity is desired and informing
113	healthcare facilities of findings. The data is also uploaded into Vigiflow database,
114	including causality assessment outcome and case summary reports.
115	

116 Materials and Methods

117 We conducted a descriptive cross-sectional study and surveillance system evaluation 118 using updated CDC guidelines for surveillance system evaluation as a mixed method. 119 Health Personnel involved in the ARV-ADR surveillance system were randomly 120 selected to participate in the evaluation. These included doctors, pharmacists, nurses 121 and pharmacy technicians. Harare City's two hospitals were purposively selected for 122 the study and seventeen out of 38 clinics were randomly selected for the study. At the 123 hospitals, all available health workers (nurses, pharmacists and doctors) working in 124 OI clinics were recruited as study participants. The sister in charge, pharmacist and 125 doctor at the OI clinics and hospitals were purposively recruited for the study. From 126 the clinics, nurses who were found on duty on the day of data collection were selected 127 for the study. All data records on reported ART ADR's for the period under study 128 were reviewed at MCAZ and triangulated with data from the facilities. 129 Using Dobson formula: $n = Z_a^2$ (p) (1-p)/delta², where $Z_a=1.96$, p=0.5, assuming that 130 50% of health workers interviewed had adequate knowledge, at 20% precision and

131 80% power, a sample size of 47, adjusted for 10% non-response rate, sample size of132 52 was reached.

133	A pre-tested interviewer-administered questionnaire was used to interview the health
134	workers to determine their knowledge of the operations and usefulness of the
135	surveillance system. The variables assessed on health worker knowledge included: the
136	ability to accurately enumerate the key elements of an ADR, (a noxious response,
137	unintended, at therapeutic dosage), sequentially relating the entire ADR reporting
138	process, the purpose and the role of MCAZ in ADR Surveillance. The quality of the
139	data generated was scored in relation to completeness, consistent with WHO
140	evaluation criteria.
141	A checklist was used to assess the system's stability. Records of all patients who were
142	attended at the health facilities were reviewed to check on the number of ARV ADR
143	cases documented and the number captured by the surveillance system and how many
144	were missed. All notification forms from January to December 2016 were reviewed.
145	Simplicity, data quality, completeness, acceptability, sensitivity, timeliness and
146	representativeness of the system were evaluated. Epi Info TM was used to compute
147	frequencies, means, and proportions. The checklist for PV indicators was evaluated
148	according to WHO score values.

149

Permission to carry out the study was obtained from the Institutional Ethical clearance
boards for the Medicines Control Authority of Zimbabwe (MCAZ), Harare city and
Ministry of Health and Child Care, Written informed consent was obtained from key
informants.

154

155

156 **Results**

157 Demographic characteristics

- 158 The study successfully recruited 52 Health workers as study participants, yielding
- 159 100% response rate. Of the 52 participants recruited, 73% (n=38) were females. The
- 160 majority (75%) of the participants were Registered General Nurses (RGNs). The
- 161 median years of service of all participants were 9 years ($Q_1 = 7$, $Q_3 = 12$). (Table 1.)

162 Health Worker Knowledge of ARV ADR Surveillance

- 163 Varied proportions of respondents gave accurate responses to each variable assessed
- 164 on health worker knowledge. The total score was then rated using a 5-point Likert
- scale which ranged from very poor, poor, fair, and good to very good. Overall,
- 166 knowledge was rated as fair.

167 System Attributes

168 Data Quality

- 169 Data quality obtained a score range of .75-1.0, according to WHO derived from
- 170 country records that were committed to WHO Vigiflow. Observed completeness of
- available forms from the sites was consistent with the national score.

172 Simplicity

- 173 Out of the 52 participants, only 12 (29.4%) had ever completed an ADR form.
- 174 Reported average time taken to complete AR forms, by those who had done so before
- 175 was 14 minutes. However whilst being timed, participants took an average of 7-9
- 176 minutes 7/12 (19.6%) participants reported that the forms were easy to complete, and
- 177 10 out of 12 accurately outlined the entire reporting process for ADR's. Forty-three
- 178 (82.7%) stated that they needed formal training to be able to fill the notification
- 179 forms. All ADR cases were referred to Wilkins and Beatrice road hospitals were
- 180 reports are generated and submitted.

181 Acceptability

182 90.4% of the participants felt that it was their duty to complete the ADR forms and

183 92.3% participants were willing to continue participating in the ADR surveillance.

- 184 Thus based on the subjective assessment gathered from the interview, on average,
- ADR surveillance is 91.4% acceptable to health workers in Harare City.

186 Stability

187 Twenty-one (40.4%) of the participants reported that they had ADR case definitions

188 in their Health facilities. However only two out of 19 (10.5%) health facilities had the

ADR case definition displayed. Five (26.3%) health facilities had ADR forms

- available in their workstations. Thirteen (25%) of the participants knew about the
- 191 2016 invented online reporting facility, but none had ever used it due to computer,
- 192 Internet and knowledge challenges. One health facility (Wilkins hospital) had
- 193 accessible, facility-level ADR record. All facilities had a working phone for
- 194 communication.

195 Usefulness- Perceptions of ADR Surveillance System, Harare City, 2017

196 Overall 69.2% of the participants used ADR data in patient management whilst 13.5%

- said they held review meetings for ADR's. There was no evidence of minutes to the
- 198 referred meetings. Clinicians made therapeutic decisions using ADR data, such as
- switching to next line regimen. Applying the 5 points Likert scale on the resultant
- 200 usefulness score, ADR pharmacovigilance was somewhat useful with an average
- 201 score of 64.5%. (Table 2.)
- 202 Representativeness

203 The system was not representative. The City Council imposed protocol of referring

ADR's to their two hospitals results in an overestimation of reports generated by the

205 hospitals, at the same time underestimating the prevalence of ADR's within the

206 community health facilities by person place and time. Many ADR's are not being

207 reported for fear of writing reports as required by the City health department.

208 Timeliness of the ARV ADR Surveillance System in Harare City, 2017

209 Severe and Moderate reactions were all (100%) reported to the authority on time

210 (within 48 hours), entirely from the two hospitals. Mild and Incidental reactions were

all (100%) treated according to facility protocol before completion and submission of

the forms within 14 days.

213 The sensitivity of the ADR Surveillance System in Harare City, 2017

214 Individual Case Safety Reports (ICSRs) received by MCAZ amounted to 642,

reflecting a case detection rate of 5/ 100 000, calculated using the national population

of 14 million in 2015. All received reports were tabled at PV and clinical trials

217 committee meetings and feedback submitted to the city health authorities. We

218 observed that e86% of the Targeted Spontaneous Reports (TSR) received since 2012

and authenticated by MCAZ were committed to the WHO Vigibase, termed Vigiflow

as at 31 December 2016. Notably, 10 cases of product defects were reported in 2016,

seven of which were subsequently recalled by the authority. More than 1900 adverse

drug reaction cases, termed signals, were reported and the most common ones

included gynecomastia, drug-induced liver injury, steven johnson syndrome,

224 lipodystrophy and renal toxicity.

We further observed that 119 health facilities, countrywide, actively reported ADR's

226 (Sept 2012 to Dec 2016), yet only 32 of these facilities submitted ADR reports in

227 2015. This indicator is qualified by submission of \geq 10 reports annually to the

228 pharmacovigilance centre. The pharmacovigilance unit met the minimum

requirements of a regulatory authority, according to WHO standards. (Table 3.)

230

231 ARV ADR detection Strategies in Place, Harare City, 2017

- 232 Thirty-eight (73.1%) participants indicated that they detected ADR's following client
- 233 complaints, whilst 21(40.4%) identified ADR's during clients routine review visits
- and examinations. Nine (17.3%) enquired clients how they were responding to
- treatment, whereas 34(65.1%) only identified ADR's following clients' failure to
- tolerate treatment and have defaulted.

237 Reasons for underreporting of ARV ADR's, Harare City, 2017

- 238 Whereas MCAZ is mandated to feedback on outcomes of all reported ADR's,
- 46(88.5%) of the participants stated that None response by MCAZ to reported ADR's
- 240 was the reason for under-reporting of ARV ADR's. Unavailability of reporting forms
- was cited 44, (84.6%) whilst 33 (63.5%) thought weak incident detection strategies
- 242 was the reason for under-reporting. (Table 4.)

243 Discussion

- 244 The data generated from the few reporting sites was of good quality in regard to
- completeness. A score of 0.75-1.0 for a country with a pharmacovigilance system that
- is still under development is remarkable. This is contrary to findings by Nderitu et al
- 247 (2011) in Kenya who found incomplete records as a major hindrance to causality

assessments in a developing pharmacovigilance systems (3).

- 249
- 250 Health workers are supposed to be knowledgeable about the surveillance system so
- that they are able to identify and investigate suspected cases during their routine
- conduct of duty. Knowledge on ARV pharmacovigilance surveillance in regard to
- 253 qualifying ADR's, the reporting process and the role of MCAZ was low in Harare
- 254 City. This was despite their recognition that reporting ADR's is within their scope of
- 255 practice, accepting the responsibility. It was noted that the majority of the health

256 workers were not trained (formally or on-the-job) on ARV, ADR surveillance 257 although pharmacovigilance is a component of ART management, for which all 258 health workers are oriented on. Poor knowledge contributed to the poor performance 259 of the system. 260 261 The City Council imposed protocol of referring all suspected ADR's instead of 262 reporting directly to MCAZ resulted in it being impossible to assess the incidence 263 and prevalence of ARV ADR's by person place and time. All reports were being 264 generated from Wilkins and Beatrice road hospitals. 265 266 The ARV ADR's surveillance system in Harare city is simple. The few who filled the 267 forms encountered no challenges. When MCAZ received suspected ADR reports, a 268 pharmacovigilance and clinical trials committee sat to discuss and recommend 269 causality assessment, particularly for peculiar reactions. All reports were responded to 270 through the city health directorate for communication to reporting sites. However, health workers from reporting sites reported not receiving feedback, which 271 272 demotivated them from continuous reporting. This was consistent with the findings of 273 a study by Hall et al in Mpumalanga, South Africa, 2009 where feedback motivated

continuous reporting of ADR's (13). If health workers lack motivation, no active

275 detection mechanisms may be implemented to ensure identification of all DR's and

their subsequent reporting.

277

278 Timeliness of a surveillance system is a key performance measure. However, in

279 pharmacovigilance, reporting ADR's is preceded by immediate mitigation of the

280 effects. Targeted spontaneous reporting (TSR) is the surveillance approach that has

281 prescribed timelines unlike the voluntary spontaneous reporting (SR) that was being 282 evaluated which is supposed to be part of routine practice. MCAZ acknowledged 283 reception of ADR forms within the recommended 14-day window to facilitate 284 causality assessments. This is contrary to findings by Bate et al in Reo de Janeiro, 285 2012, who identified challenges with data transmission as an impediment to the 286 timely reception of reports in resource-constrained environments (14). 287 All the participants stated that it was their duty to fill the notification forms and were 288 willing to continue participating, hence the system was acceptable. However, the 289 majority of the health workers stated that they needed training on case detection and 290 on how to fill the notification forms. Similar findings were reported by Pirmohamed 291 et al in Malawi, where none of the study participants was trained on ARV 292 pharmacovigilance and this was attributed to the high staff turnover between 2007 and 293 2009 (5). 294

295 Zimbabwe is compliant to the WHO minimum requirements of a functional

296 pharmacovigilance system as stipulated by the core and complementary structural

297 pharmacovigilance indicators (2015). The MCAZ, whose mandate is to ensure

298 medicine safety through the institution of regulatory frameworks is compliant to

299 WHO minimum pharmacovigilance indicators for a functional PV centre [14]. A total

number of 642 reports were received by 31 December 2016, translating to 4/100 000

301 people, having considered a population size of 15.6 million for 2015 which is a core

302 pharmacovigilance indicator (CP1). This is remarkable for a developing PV centre.

303 Exercising its regulatory mandate as envisaged by PV indicator C02, the authority,

304 out of the 10 cases of product defects that were reported, 7 products were recalled.

305 This was commendable as if fosters compliance to set regulations.

306	For a reporting facility to be a functional pharmacovigilance unit, it should submit
307	submits ≥ 10 reports annually to the pharmacovigilance centre according to WHO PV
308	indicator P1. Only 2 centres, Wilkins and Beatrice road Hospitals fit this category in
309	Harare city and there were a total 119 centres countrywide as at 31 December 2016
310	since 2012. However, in 2015 alone, only 32 health facilities submitted ADR reports
311	countrywide. This reveals that there are facilities which were initially reported but
312	have backtracked which is a cause for concern. There is, therefore, need to investigate
313	what might have demotivated them from maintaining the set standards as this lowers
314	the national performance.
315	Active ARV ADR detections entail enquiring from the client how they are responding
316	to the treatment. This was found to be lacking among healthcare staff in Harare city,
317	instead, most participants revealed that they were detecting ADR's from client
318	complaints. Poor ARV ADR's detection in a city results in inaccurate quantification
319	of the prevalence of ADR's in the postmarket surveillance period. Reasons
320	highlighted for poor ARV ADR detection were a lack of knowledge and training
321	among health workers, MCAZ introduced an online reporting on 1 September 2016
322	but the facility remained unutilised due to lack of knowledge of its existence.
323	
324	The ARV ADR surveillance system was reported to be useful although the majority
325	lack knowledge on the surveillance system. Only one facility, Wilkins hospital had an
326	available local database of all reported ADR'S which provided an opportunity for
327	local utilisation of this data in programming.
328	The participants cited non-response by MCAZ to submitted reports as a major reason
329	for under-reporting of ARV ADR's. On the other hand, MCAZ indicated 100%
330	response to all submitted reports. Further analysis revealed that although MCAZ

331 responded to all submitted reports, the communication was conveyed through the City 332 health directorate. Unfortunately, this communication was not being disseminated to 333 report generating facilities. Unavailability of reporting forms, lack of appreciation of 334 the importance of reporting ADR's and health workers being overwhelmed with other 335 responsibilities were other reasons attributed to under-reporting. This is contrary to 336 the scope of accepting ADR detection as part of routine clinical practice as indicated 337 by the same participants which also consistent with findings by Wiholm et al, 2004 in 338 Swaziland who identified lack of appreciation of the value of ADR reporting in the 339 post-market surveillance period as a hindrance to reporting (14). 340

341 Conclusions

342 We concluded that knowledge among health workers in the city was average and the

343 quality of data generated and committed to Vigiflow was good. City council imposed

344 protocol of referring suspected ADR's impeded reporting directly from facilities.

Possible reasons for under-reporting ADR's were a lack of knowledge of health

346 workers, weak incident detection strategies, local protocol and poor information

347 dissemination within the council. Though MCAZ were responding to the reports, their

- 348 responses were not being disseminated to report generating facilities. MCAZ was
- 349 fulfilling its mandate of ensuring pharmacologic safety as envisaged by the minimum
- 350 PV indicator compliance as well as exercising its regulatory authority by licensing
- and recalling defective medicines

352 The ADR pharmacovigilance system was therefore found to be useful, simple,

acceptable, sensitive, unstable and not representative

We, therefore, recommended training of all untrained health workers involved in

355 ADR pharmacovigilance. ADR case definitions and notification forms were

356	distributed to health facilities in the city which did not have these. The local authority
357	was engaged, in liaison with MCAZ, for a possible review of the local policy and
358	facilitate reporting of ADR's from detecting health facilities. MCAZ and Harare city
359	directorate pledged to explore effective feedback dissemination mechanisms that will
360	ensure all facilities receive feedback for reported ADR's
361	
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444 Figure legend

445 Figure 1: The ARV ADR Surveillance Flow Diagram

446 Tables

Table 1: Demographic	Characteristics	of	Study	Participants,	Harare	City,
Zimbabwe, 2017						

Characteristics	Frequency n (%) n	n=52		
Gender				
Female	38 (73)			
Male	14 (27)			
Designation				
Medical Doctors	4(7)			
Registered General Nurses (RGNs)	39 (75)			
Pharmacy Technicians	3 (6)			
Primary Counsellors (PC)	6(12)			
Median Years in Service	9 (<u>Q1</u> = 7 , <u>Q3</u> = 12)	9 (Q1=7, Q3=12)		

- 448 RGN: Registered General Nurse
- 449 PC: Primary Counsellor
- 450 Q₁: First Quartile
- 451 Q₃: Third Quartile
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Variable	Doctors (%)	Nurses (%)	Pharmacy Technicians (%)	Primary Counsellors (%)
Data used in patient management (Yes)	4 (100)	28 (71.8)	1 (33.3)	3 (50)
ADR Meetings held (Yes)	0	5 (12.8)	0	2 (33.3)
Decisions based on ADR's (Yes)	4 (100)	38 (97.4)	3 (100)	4 (66.7)
Thought ADR Surveillance is useful	4 (100)	39 (100)	3 (100)	4 (66.7)
Overall Usefulness Rating	75%	70.5%	58.3%	54.2%

Pharmacovigilance indicator	Key Attribute Assessed	Response and Value
CP1	Total number of ADR reports received in 2015	ICSRs(AEFIs, TSR, SAEs) received by the MCAZ = 642
CP1 a	Total number of ADR reports received in the previous year per 100 000 people in the population	5/100 000
CP2	Number of reports (total @ 31/12/16) in the national database?	AEFIs = 331, TSR = 1563, SAEs = 361
CP3	Percentage of total annual reports acknowledged/issued feedback?	100%
CP4	Percentage of total reports subjected to causality assessment in the past year?	100%
CP5	Percentage of above committed to the WHO database?	86% of TSR reports received since Sept 2012 committed to VigiFlow
C01	Signals generated in the past 5 years by the pharmacovigilance center?	+1900 ADR's
CO2	Regulatory actions were taken in the preceding year	7 products were recalled
P1	Percentage of health-care facilities that had a functional pharmacovigilance unit (i.e. submits ≥ 10 reports annually to the pharmacovigilance center)?	Sept 2012 to Dec 2016 = 119 health facilities 2015 = 32 health facilities submitted ADR reports.

- 479 CP: WHO Core Pharmacovigilance Indicator
- 480 CO: Core Outcome Indicator
- 481 P1: Complementary Process Indicators
- 482 ICSR: Individual Case Safety Report
- 483 AEFI: Adverse Event Following Immunization
- 484 TSR: Targeted Spontaneous Reporting System for Adverse Reactions
- 485 SAE: Serious Adverse Events

Reason for Underreporting	Frequency n (%)
Lack of knowledge by health workers	21 (40.4)
Weak incident detection strategies	33 (63.5)
Unavailability of forms	44 (84.6)
Health workers overwhelmed by other responsibilities	27(51.9)
Lack of appreciation of the importance of reporting ADR's	30(57.7)
Non-response by MCAZ to reported ADR's	46(88.5)

486

Flow of Information in the ARV Pharmacovigilance System

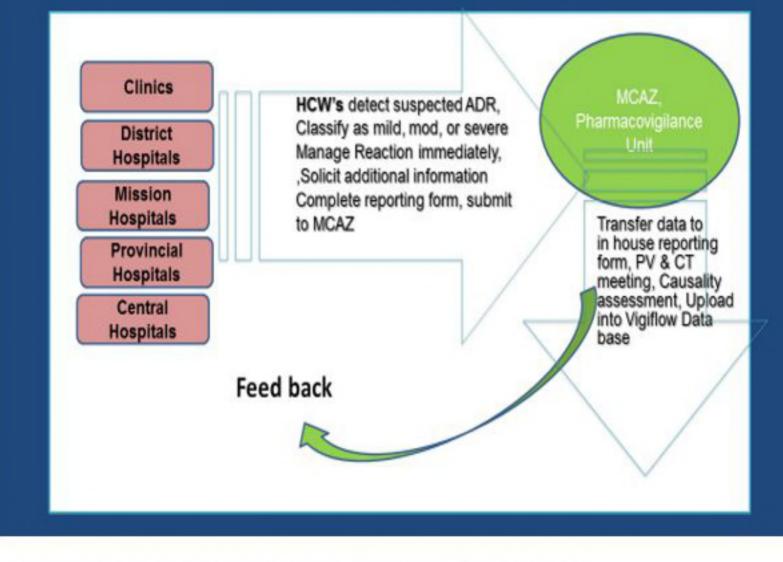


Figure 1: The ARV ADR Surveillance in Zimbabwe Flow Diagram