



**IMDRF**

International Medical  
Device Regulators Forum

# **Adverse Event Terminology and Coding Working Group**

Sept 2019

**Working Group Chair:**

**H. Ishikawa**

**Office of Standards and Compliance for Medical Devices  
Pharmaceuticals and Medical Devices Agency**



## Overview of IMDRF AE WG

NWIP

Initial submission: September 2014

Not adopted

Followed by discussions in the small expert WG

Adoption: March 2015

### **Mission;**

Development of a harmonized terminology for reporting adverse events related to medical devices including in-vitro diagnostics (IVDs).

### **Purpose;**

To improve the efficiency of the adverse event management systems for faster response by both industry and regulatory agencies, with the use of a single, appropriate adverse event terminology and coding system.



## Benefits;

- Improved accuracy of capturing and reporting of medical device related adverse events,
- Reduced ambiguity, hence increased effectiveness of the evaluation process, and
- Better usability, in contrast to narrative text;

for

- More sophisticated signal detection (i.e. the identification of potential novel risks), and
- Trending analysis by incident management systems including advanced querying functions and data visualization.

Thus enabling a faster response by both regulatory agencies and device manufacturers.



## Member list

### Australia: TGA

Pamela Carter  
Jorge Garcia

### Brazil: ANVISA

Maria Gloria Vicente  
Sheila Martins Cordovil  
Carla Cruz

### Canada: Health Canada

Richard McAteer  
Tanya Hiebert  
Leanne Moore  
Gayatri Jayaraman

### European Union:

Jean-François Roche (EC)  
Tony Sant (UK, MHRA)  
Claudius Griesinger (EC/JRC)  
Graham Nash (UK, MHRA)  
Tim Raemaekers (EC/JRC)  
Juan Antonio Blasco Amaro (EC/JRC)  
Dimitrios Panidis (EC/JRC)  
Robin Seidel (BfArM- Germany)

### Russia: Roszdravnadzor

Aysylu Valeeva  
Elena Astapenko  
Yaroslav Kurtukov

**WHO:** Anita Sands  
**Japan: PMDA** Hiroshi Ishikawa (Chair)  
Mika Togashi  
Kaori Ogawa  
Tsutomu Makino  
Yasuyuki Sakurai  
Toru Takahashi  
**MHLW** Fumihito Takanashi  
Akimasa Takeuchi  
Yusuke Ueda

### US: FDA

Nancy Pressly  
Evan Jacobs

### Singapore: HSA

Woei Jiuang Wong  
Lailing Liew

### South Korea: MFDS

Hyeonho Kim

### AHWP:

Sasikala Devi Thangavelu  
Azat Iskaliyev  
Dinara Esbolatova  
Gulnar Berkimbayeva



## Recent Meetings

- March 26<sup>th</sup> – 29<sup>th</sup>, 2019  
**8<sup>th</sup> Face to Face meeting in Brazil**
- April 24<sup>th</sup>, 2019  
23<sup>rd</sup> Teleconference
- May 22<sup>nd</sup>, 2019  
24<sup>th</sup> Teleconference
- June 18<sup>th</sup>, 2019  
25<sup>th</sup> Teleconference

## Coming Meeting

- Nov 4<sup>th</sup>- 7<sup>th</sup>, 2019  
**9<sup>th</sup> Face to Face meeting in Switzerland**



## Adverse Event Reporting

### DEVICE/COMPONENTS

Medical Device Problem  
(Annex A)

What was the problem at device level?

Component  
(Annex G)

Which components were involved

What were the probable causes of the problem

Cause Investigation  
(Annex B-D)

### PATIENT

Health Effects  
(Annex E, F)  
(Previously "Patient Problem")

What adverse events happened at patient level



## **Title:** IMDRF terminologies for categorized Adverse Event Reporting (AER): terms, terminology structure and codes

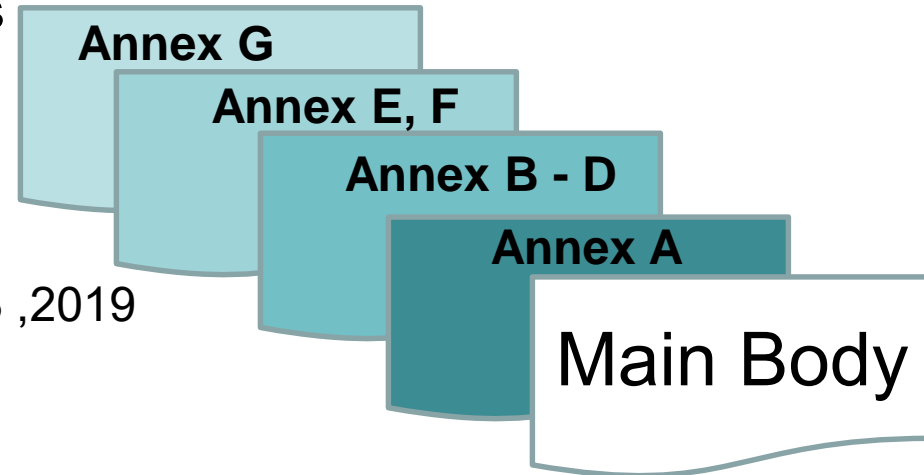
Main Body: published on April 10<sup>th</sup> in 2017  
revised with the addition of Annexes  
B, C ,D, E and F published as Edition 3 ,2019  
on March 21<sup>st</sup>, 2019

Annex A (Medical Device Problem):  
published with mapping on April 10<sup>th</sup>, 2017; Sep. 21<sup>st</sup>, 2017 (Edition2)

Annex B – D (Cause Investigation):  
published on Sep. 21<sup>st</sup>, 2017

Annex E, F (Health Effects):  
published on March 21<sup>st</sup>, 2019

Annex G (Component): Under process to Public consultation





## Annex A: Medical Device Problem

### Annex A Medical Device Problem

Level 1			Level 2			Level 3		
Term	Definition	Code	Term	Definition	Code	Term	Definition	Code
Patient Device Interaction Problem	Problem related to the interaction between the patient and the <b>device</b> .	A01	Patient-Device Incompatibility	Problem associated with the interaction between the patient's physiology or anatomy and the <b>device</b> that affects the patient and/or the <b>device</b> .	A0101	Biocompatibility	Problem associated with undesirable local or systemic effects due to exposure to medical device materials or leachates from those materials by a patient who has an implant or is receiving treatment with a <b>device</b> made from them.	A010101
						Device Appears to Trigger Rejection	The <b>device</b> appears to elicit undesired response in the patient to the presence of an implanted or invasive <b>device</b> , without inherent <b>device</b> failure, e.g. fibrous encapsulation, or inflammation of the tissue around the <b>device</b> , or extrusion of the <b>device</b> .	A010102
						Inadequacy of Device Shape and/or Size	The physical size and/or shape of the <b>device</b> was inadequate with regard to the patient's anatomy.	A010103
			Osseointegration Problem	Problem associated with interconnection between the bone tissue and the implanted <b>device</b> .	A0102	Failure to Osseointegrate	Problem associated with the failure to see direct anchorage of an implant by the formation of bony tissue around the implant without the growth of fibrous tissue at the bone-implant interface.	A010201
						Loss of Osseointegration	Problem associated with weakened integration of the <b>device</b> at the bone-implant interface due to loss of fibrous and/or bony tissue and leading to compromised anchorage of the device. i.e.	A010202

Level 1 term:  
Patient Device  
Interaction Problem





## Annex B: Type of Investigation

### Annex B: Type of Investigation

**Note: Select as many terms as necessary/appropriate to characterise the investigation**

**Device (bold):** For the purpose of this Annex B, a **device** means a medical device including accessories

Level 1		
Term	Definition	Code
Testing of Actual/Suspected Device	The investigation employed relevant empirical testing of the actual <b>device</b> suspected in the reported adverse event in order to establish their functional and other properties and to identify possible causes for	B01
Testing of Device from Same Lot/Batch Retained by Manufacturer	The investigation employed relevant empirical testing of the <b>device</b> retained in the reported adverse event in order to support the identification of possible causes for the adverse event. The <b>device</b> was retained from the user. Relevant testing would typically be based on test methods used for evaluating safety and performance as described in the latest relevant standards.	B02
Testing of Device from Same Lot/Batch Returned from User	The investigation employed relevant empirical testing of the <b>device</b> of the same lot or batch than that of the suspected <b>device</b> in the reported adverse event in order to support the identification of possible causes for the adverse event. The <b>device</b> was returned from the user. Relevant testing would typically be based on test methods used for evaluating safety and performance as described in the latest relevant standards.	B03

### Testing of Actual/Suspected Device



## Annex C: Investigation Findings

### Annex C Investigation Findings ("what were the findings?")

**Device (bold):** For the purpose of this Annex C, a **device** means a medical device including accessories and components.

Level 1			Level 2			Level 3			
Term	Definition	Code	Term	Definition	Code	Term	Definition	Code	
Biological Problem Identified	Problems relating to, caused by or affecting biological processes or living organisms.	C01	Biocompatibility Problem Identified	The <b>device</b> causes cellular or tissue responses that elicit an undesirable local or systemic effect in the recipient or beneficiary of that therapy. (See ISO 10993)	C0101				
			Biological Contamination	The undesirable presence of living organisms such as bacteria, fungi, or viruses or their products (enzymes or toxins).	C0102	Endotoxin Contamination	The undesirable presence of toxins associated with certain bacteria (e.g. gram negative bacteria).	C010201	
								able presence of ms or microbes such as fungi (yeasts and	C010202
			Material or Material Leachate Pyrogenic Problem	The undesi pyrogens o organisms permeate t					
			Cytotoxicity Problem Identified	The <b>device</b> wa undesirable level of toxicity to living cells.					
Genotoxicity Problem Identified	The <b>device's</b> ability to cause damage to genetic material (e.g. leading to malignant tumors). (See ISO 10993)	C0105			C0105	Carcinogenic Problem	The <b>device's</b> ability to trigger development of cancer.	C010501	
						Mutagenic Problem	The <b>device's</b> ability to change genetic information (usually DNA) of an organism and thus increasing the frequency of mutations.	C010502	
Hematological Problem Identified	The <b>device</b> affects or impacts the blood or its components. (See ISO 10993 all parts)				C0106	Agglutination Problem	The <b>device</b> affects the ability of the blood to clot which may be induced by chemical, mechanical, or thermal properties of the <b>device</b>	C010601	

Level 2 term:  
Biological  
Contamination



## Annex D: Investigation Conclusion

### Annex D: Investigation Conclusion ("why did the incident/adverse event occur?")

**Device (bold):** For the purpose of this Annex D, a **device** means a medical device including accessories and components.

Level 1			Level 2		
Term	Definition	Code	Term	Definition	Code
Cause Traced to Device Design	Problems traced to the design specifications (e.g. in the requirements, testing processes, hazard analysis, implementation strategy).	D01	Design Inadequate for Purpose	Problems traced to design/design features of the <b>device</b> that do not support or interfere with the intended purpose of the <b>device</b> .	D0101
			Human Factors Engineering - Device Difficult to Operate	Problems traced to inappropriate and/or inadequate assessment and engineering design of the <b>device</b> to accommodate how or where the <b>device</b> will be used.	D0102
			Human Factors Engineering - Device Difficult to Assemble	Problems traced to inadequate design of the component parts and/or assembly steps resulting in the <b>device</b> not being able to be assembled correctly.	D0103
			Human Factors Engineering - Device Difficult to Reprocess	Problems traced to inadequate design of the reprocessing steps and/or the <b>device</b> resulting in the <b>device</b> remaining unclean.	D0104
			Missing or Inadequate Safety Measures	Problems traced to inadequate design or complete lack of safety measures leading to <b>device</b> malfunction or unintended properties of the <b>device</b> including possible hazards for persons using the <b>device</b> .	D0105
			Design Change Validation Inadequate	Problems traced to inadequate or lack of validation of design changes of the <b>device</b> leading to malfunction or unintended properties of the <b>device</b> including possible hazards for persons using the <b>device</b> .	D0106

Level 2 term:  
 Human Factors  
 Engineering – Device  
 Difficult to Operate



## Annex E and F: Health Effects Terms and Codes

### Annex E Clinical Signs, Symptoms and Conditions

e.g. Paralysis  
Keratitis  
Burn  
Fracture

### Annex F Health Impact

e.g. Death  
Delay to Diagnosis/Treatment/Therapy  
Hospitalisation or Prolonged Hospitalisation  
Inadequate/Inappropriate Treatment  
Minor Injury/ Illness/Impairment  
Serious Public Health Treat/Injury/Illness/Impairment  
Misdiagnosis/Misclassification  
Intervention/Medical Intervention



### Annex E: Clinical Signs, Symptoms and Conditions

No./ Category (Level 1) (Organs, Systems, Disorders, Concepts)	
1. Nervous System	14. Reproductive System and Breast
2. Mental, Emotional and Behavioural Disorders	15. Pregnancy, Childbirth and the Puerperium
3. Blood and Lymphatic System	16. Musculoskeletal System
4. Immune System	17. Skin and Subcutaneous Tissue
5. Vascular System	18. Neoplasms Benign, Malignant and Unspecified
6. Heart	19. Infections
7. Respiratory System	20. Injury
8. Eye	21. Procedural Complications
9. Ear and Labyrinth	22. Investigations and Diagnostic Tests
10. Gastrointestinal System	23. General Disorders
11. Hepatic and Biliary System	24. Others
12. Metabolism and Nutrition	LIST (all terms in one sheet)
13. Kidney and Urinary Tract	



## Annex E: Clinical Signs, Symptoms and Conditions

### Annex E. Clinical signs, symptoms and conditions

Device (bold): For the purpose of this Annex, a device means a medical device including accessories and components  
 Wherever appropriate "patient" should be taken to include user, operator or any other person affected by the incident.

LEVEL 1								LEVEL 3							
Category	Term	Definition	IMDRF Code	MedDRA Code	MedDRA LLT	Primary Category	Secondary Category	Term	Definition	IMDRF Code	MedDRA Code	MedDRA LLT	Primary Category	Secondary Category	
Nervous System	Balance Problems	A feeling of falling down which can occur whether the person is standing, sitting or lying down.	E0101	10049848	Balance disorder										
	Brain Injury	Damage to the brain.	E0102	10060690	Traumatic brain injury	Nervous System	Injury	Encephalocele	Hernia of brain substance and meninges through a congenital or traumatic opening of the skull.	E010201	10014617	Encephalocele	Nervous System	Injury	
	Cerebral Edema	Swelling in the brain due to an increase in fluid.						Generalized seizures							
	Cerebral Hyperperfusion Syndrome	Unexpected cerebral hyperemia of the carotid end arteries or carotid arteries (CAS).						Cerebrovascular System							
	Cerebral Ventriculomegaly	Abnormal enlargement of cerebral ventricles.													
	Cerebrospinal Fluid Leakage	The loss of cerebrospinal fluid into the surrounding tissue.													
	Cognitive Changes	Changes in perception, thinking, or memory.						Confusion/Disorientation	A mental state characterized by a lack of clear and orderly thought and behavior.	E010701	10010300	Confusion			
								Dementia	Loss of intellectual abilities interfering with an individual's social and occupational functions.	E010702	10012267	Dementia			
	Concussion	Traumatic brain injury as a result of the action of a mechanical force on the head.	E0108	10010254	Concussion	Nervous System	Injury								
	Convulsion/Seizure	Sudden, involuntary skeletal muscular contractions of cerebral or brain stem origin.	E0109	10010904	Convulsion			Convulsion, Clonic	A convulsion marked by alternating contracting and relaxing of the muscles.	E010901	10053398	Clonic convulsion			
								Convulsion, Tonic	A convulsion marked by prolonged contraction of the muscles.	E010902	10043994	Tonic convulsion			
								Epilepsy	Epilepsy caused or apparently caused by device. Do not use when epilepsy is a pre-existing condition.	E010903	10015037	Epilepsy			
								Status Epilepticus	A life-threatening condition characterized by a single prolonged seizure or a series of seizures without intervening full recovery of consciousness.	E010904	10041962	Status epilepticus			
	Decreased Sensitivity	Lower capacity to notice through one or more senses.	E0110	10071552	Hyporesponsive to stimuli										
	Increased Sensitivity	Higher capacity to notice through one or more senses.	E0111	10082489	Hyperresponsive to stimuli										
Dizziness	A sensation of lightheadedness, unsteadiness, turning, spinning or rocking.	E0112	10013573	Dizziness											
Dysphasia	Impairment of verbal communication skills, often	E0113	10013951	Dysphasia			Aphonia	Inability to speak.	E011301	10002953	Aphonia				

Level 2 term: Brain Injury



## Annex F: Health Impact

### Level 1 terms

Change in Therapeutic Response	Recognised Device or Procedural Complication
Death	Reduction in Life Expectancy
Brain Death	Sedation
Delay to Diagnosis	Rehabilitation
Delay to Treatment/ Therapy	Surgical Intervention
Disruption of Subsequent Medical Procedure	Serious Public Health Threat
Exacerbation of Existing Condition	Unexpected Deterioration
Hospitalization or Prolonged Hospitalization	Unexpected Diagnostic Intervention
Fetal Harm	Unexpected Medical Intervention
Inadequate/Inappropriate Treatment or Diagnostic Exposure	Insufficient Information
Minor Injury/ Illness / Impairment	Unanticipated Adverse Device Effect
Serious Injury/ Illness/ Impairment	No Health Consequences or Impact
Misdiagnosis/ Misclassification	No Patient Involvement
Prolonged Episode of Care	Appropriate Term/Code Not Available



## Annex F: Health Impact

### Annex F. Health Impact

**Device (bold):** For the purpose of this Annex, a **device** means a medical device including accessories and components

Wherever appropriate "patient" should be taken to include user, operator or any other person affected by the incident.

LEVEL 1			LEVEL 2			LEVEL 3		
Term	Definition	IMDRF Code	Term	Definition	IMDRF Code	Term	Definition	IMDRF Code
Change in Therapeutic Response	Change in response to treatment or cure of a disorder or disease.	F01	Therapeutic Response Decreased	A reduction in the desirable and beneficial effects resulting from a medical treatment.	F0101			
			Therapeutic Response Increased	An increase in the desirable and beneficial effects resulting from a medical treatment.	F0102			
			Unexpected Therapeutic Effects	Unanticipated desirable and beneficial effects resulting from a medical treatment.	F0103			
Death	The cessation of life.	F02	Intrauterine Fetal Death	Death in utero; failure of the product of conception to show evidence of respiration, heart beat, or definite movement of a voluntary muscle after expulsion from the uterus, with no possibility of resuscitation.	F0201			
Brain Death	The permanent absence of external reflex and							
Delay to Diagnosis	Patient delay in diagnosis of significant consequence of <b>device</b> performance.							

Level 1 term:  
Death





## Annex G:Component *Public consultation was closed*

**Device (bold):** For the purpose of this Annex G, a **device** means a medical device including accessories and components.

	Level 1			Level 2		
	Term	Definition	Code	Term	Definition	Code
<b>Electrical &amp; Magnetic</b>	Antenna	A component designed to transmit or receive electromagnetic signals.				
	Battery	A component designed to produce an electric current through chemical reaction.				
	Battery Charge	A <b>device</b> designed to restore the capacity of a battery.				
	Cable, Electrical	A device designed for the transmission of electrical signals over a distance.		Cable Grip	Component used for tensioning, pulling or stringing of wires and cables.	
				Cable Sleeve	Component used to protect cables and wires from abrasion, moisture and the elements.	
	Circuit Board	A non-mechanical component that carries a circuit.				
	Circuit Breaker	A component designed to open an electrical circuit when it becomes overloaded.				
	Computer Hardware	The physical components from which a computer is constructed (electronic circuits and input/output <b>devices</b> ).		Computer Processor	Component that carries out the instructions of a computer program by performing the basic arithmetic, logic, controlling, and input/output operations specified by the instructions.	
				Memory/Storage	Any component that can hold data in machine-readable format.	
				Network Interface	Point of interconnection between a computer and other computer that are linked each other.	
	Computer Software	A collection of data or computer instructions that tell the computer how to work.		Driver	A computer interface designed to control the interaction between a CPU and a peripheral device.	
				Software Interface	Languages, codes and messages that	

Level 1 term:  
Battery



Maintenance

**Public consultation was closed**

Modified according to the N44 maintenance document

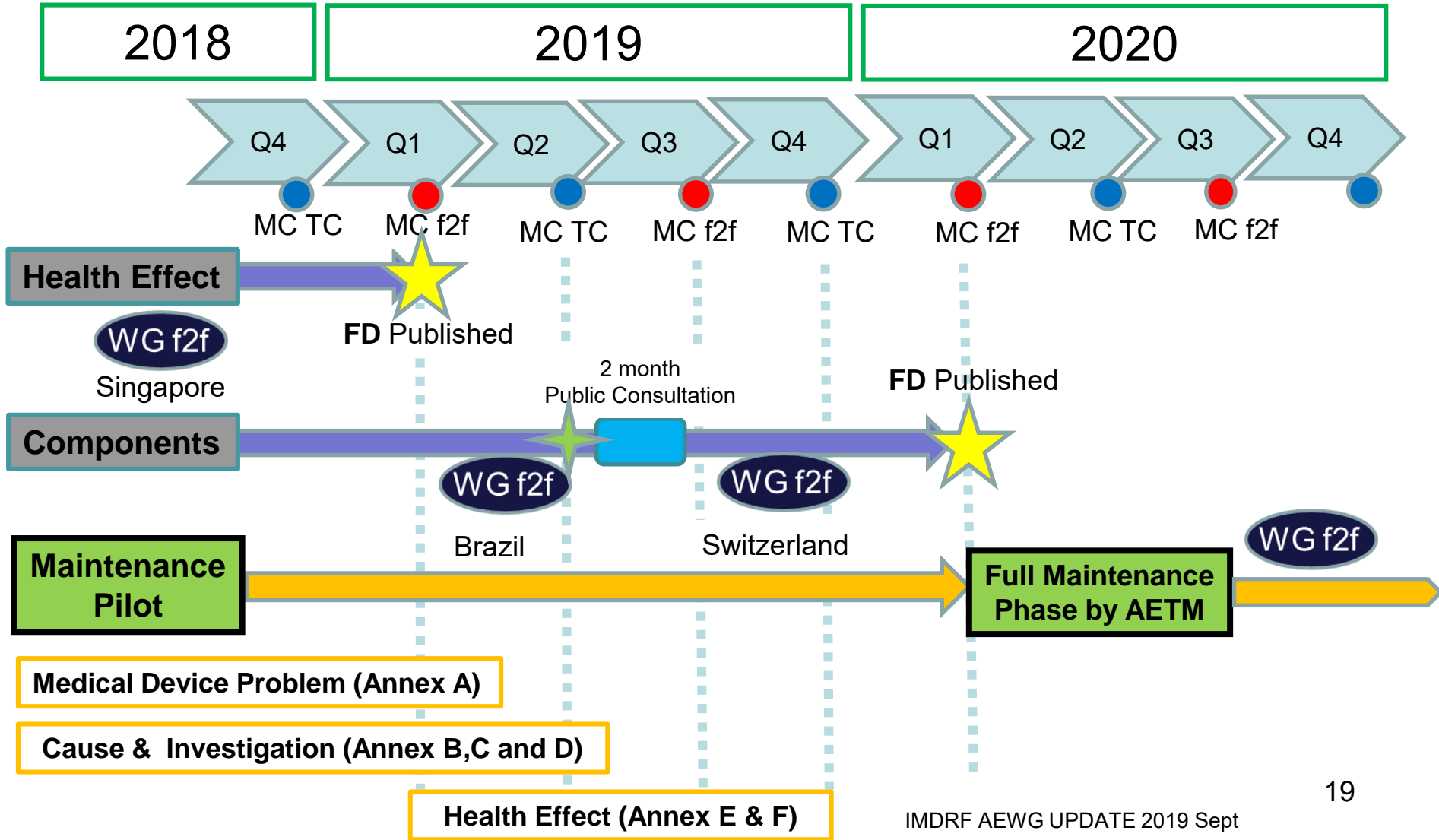
## Annex A: Medical Device Problem

A03	Device Ingredient or Reagent Problem	Problem associated with any deviations from the documented specifications of the device that relate to any ingredient or reagent characterization.	A0302	Unexpected Color	Color of product is different from that expected.	A030208
A08	Undercorrection	Problem associated with an adjustment that falls below a set of criteria.	A0805			
A09	Incorrect, Inadequate or Imprecise Result or Readings	Pro nonco results pr performa		Erratic Results	Reports of erroneous/discrepant results which combine high/low and/or positive/negative results. This term is not to be selected where reports indicate consistently high or low or false positive or false negative results.	A090813

**Level 2 term:  
Undercorrection**



## AE terminology Working Plan (as of July 2019)





# IMDRF International Medical Device Regulators Forum

Thank you!



IMDRF AEWG UPDATE 2019 Sept