e-Labeling A Practical Guide

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END**O**LOGIX

How.....

- We just heard about the:
- What?
- Which?
- ▶ Why?
- When?
- Where?
- Really?
- Here's the How.....

How.....

- Sometimes labeling projects are like herding cats......
- https://www.youtube.com/wat ch?v=m_MaJDK3VNE

eLabeling - Benefits Review



- Environmental impact by reducing:
 - Printing
 - Shipping
 - Disposal
- Patient safety improvement thru more efficient method for managing product information.
- Reduces product launch timelines for both new and sustaining product changes.
- And of course reducing cost \$\$\$\$\$



Start with an eLabeling Strategy Considerations: Cost/benefit (ROI) analysis: Sustaining products & NPD strategies Paper savings Revision notification Targeted introductions Software display changes Safety /Back-up mechanisms Risk Assessment Initial Scheduled updates

Strategy Continued...



- Website change control
- Technology requirements
 - · Data Protection
 - Tampering
 - Hacking
 - Data Security
 - · Available only to the right users
 - Data Retention
 - Previous revision access (2-15 years)
- Customer Privacy
 - · Personal data protections

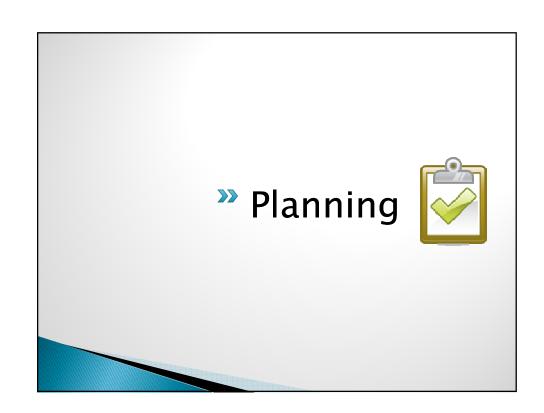
Strategy Continued...



- Customer Service Access
 - "Free of Charge" contact number EU does not support a common Toll-Free number
- Accessibility of web data
 - · Must be available at all times
- Web site design ease of use/understanding
- Paper Requirements
 - · How does customer gain access if web is down?
- Plan for customers that do not like the change.
 - Paper cost

Strategy Continued...

- Product Label Notification for customers on how to access information
 - · Additional Leaflet?
 - · Label change current label, additional label?
- In-house or Outsourced/Hosted Solution?
 - Large company good infrastructure to support inhouse systems
 - Medium to small company minimum support available - outsourcing option



Project Planning

Project Steps

- · Identify Team Members
- Develop implementation plan
- Identify website source: in-house vs outsourced
- Develop risk assessment
- · Submit to notified body for approval
- Develop inventory reduction plan
- Develop cost review/reporting schedule
- Communicate/train Customer Service/Sales
- Develop change control process/procedures for web

Project Planning

Project Steps

- Scope out plan for Customer Service support for "Free of Charge" service and paper requests
- Develop labeling plan for customer label notification on/in product
- Develop IT plan for web design, customer web access, potential web downtime, data protection, security, retention and customer privacy
- Develop web design, processes & procedures



Project Planning



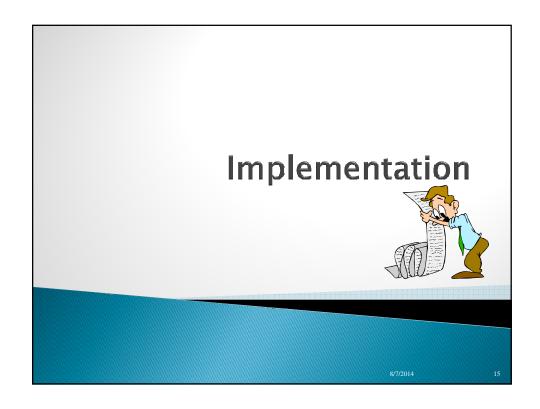
- · Project Management
- · Engineering NPD & Sustaining
- · Label Development
- · Regulatory Affairs
- IT Customer Service
 - · Communication to sales force, customers
- · Supply Chain/Demand Planning
 - · Reduction in future purchasing, inventory reduction
- Distribution
 - · IFUs for non-eLabeling countries
- Quality
- Marketing
- Finance

Planning - Customers



- Communicate early with customers about expectations of e-labeling
 - > Review & Consider:
 - · Comfort level working with eLabeling
 - · Technical capabilities?
 - Concerns
 - Follow-up with customers for feedback on ease of use





Implementation



- · Consistently review & update schedules
- · Adjust deliverable dates when required
- Manage and adjust inventory reduction plan
- Maintain regular cost, timeline reviews & reporting schedules

> Communication

• Deliver regular communication to team & leadership



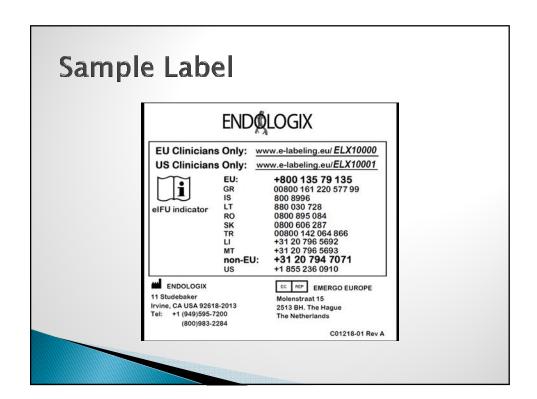
Examples

Endologix Solution

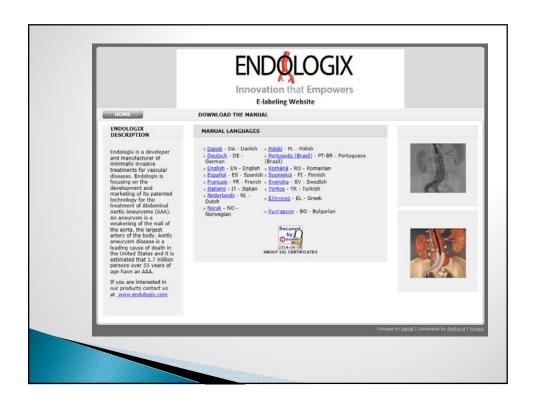
- ➤ Mid-size company
- >IT requirements are significant
 - >Data protection, security and retention
- Limited IT support (5 people which 3 are Help Desk)
 - ▶ Project execution at risk 3rd party desirable
- Customer Service constraints for call support
 - Limited resources to address web issues, paper fulfillment

Endologix Solution

- ➤ Contracted with 3rd party Emergo/Qarad (eLabeling in IVD for over 10 years)
 - ➤ Hosted website
 - > Ease of use
 - Website set up in 30 minutes
 - ► IT requirements data protection, security & retention managed by Qarad
 - >IT support 24/7
 - Customer Service support 24/7
 - > Specific global numbers to call for support/paper copies
 - > Paper copy turnaround compliance with regulation
 - > Reasonable pricing structure
 - Supplied easy to use manuals, label design samples, & Risk Analysis templates
 - > Website link to Adobe Reader







Important!

- Do not underestimate the complexity of implementing an eLabeling project..
- Note that most issues encountered are technical issues..

