Sultanate of Oman Ministry of Health Drug Safety Center Muscat



سلطنة عُمان وزارة الصحة مركز سلامة الدواء مسقط

To:

THE DIRECTOR GENERAL OF HEALTH SERVICES IN ALL GOVERNORATES

Commanding Officer, Armed Forces Hospital (Al Khoudh & Salalah)

Director General of Engineering Affairs, MOH

Director General of Royal Hospital

Director General of Khoula Hospital

Director General of Medical Supplies (MOH)

Director General of Pvt. Health Est. Affairs (to kindly arrange distribution to all Pvt. Hospitals)

Hospital Director (Al Nahda Hospital)

Hospital Director (Al Massara Hospital)

The Head of Medical Services in SQU Hospital

The Head of Medical Services in Royal Oman Police

The Head of Medical Services in Ministry of Defence

The Head of Medical Services in The Diwan

The Head of Medical Services in The Sultan's Special Force

The Head of Medical Services in Internal Security Services

The Head of Medical Services in Petroleum Development of Oman

The Head of Medical Services in LNG Oman

ALL PRIVATE PHARMACIES & DRUG STORES

After Compliments,

Please find attached our Circular No <u>95</u> dated <u>92/4/2025</u> Regarding SFDA Field Safety Corrective Action of Origin Data Management software from (mfr: Brainlab AG).

Copy to:

- Director, Office of H.E. The Undersecretary for Health Affairs
- Director of Medical Device Control, DSC
- Director of Pharmacovigilance & Drug Information Dept, DSC
- Director of Drug Control Department, DSC
- Director of Pharmaceutical Licensing Department, DSC
- Director of Central Quality Control Lab., DSC
- Supdt. of Central Drug Information





Sultanate of Oman Ministry of Health Drug Safety Center Muscat



وزارة الصحلة مركز سلامة الدواء

Circular No. 35/2025 را Circular No. Circular No. Circular No.

23-10-1446 H 2 2-04-2025

Field Safety Corrective Action of Origin Data Management software from Brainlab AG.

Source	SFDA- Saudi Food & Drug Authority. https://ade.sfda.gov.sa/Fsca/PublishDetails/329	
Product	Origin Data Management software.	
Manufacturer	Brainlab AG.	
Local agent	Waleed Pharmacy & Stores LLC.	
The affected products	Origin Data Management software versions 3.1.0, 3.1.1, 3.1.2, 3.2.0, 3.2.1 UDI-DI: 04056481145118 (ODM v. 3.1) & 04056481146078 (ODM v. 3.2).	
Reason	Under certain circumstances, it can occur that patient records from unrelated individuals are automatically merged into one patient record without user notification.	
Action	 Customers are advised to follow the instructions in the "User Corrective Action" in the attachment. Brainlab will provide a software solution in which the described issue is corrected, to all affected customers. Contact the local agent for remedial action. 	
comments	Healthcare professionals are encouraged to report any adverse events Suspected to be associated with the above device or any other medical device to Department of Medical Device Control through the E-mail: vigilance-md@moh.gov.om	

Ph. Ibrahim Nasser Al Rashd **Director General**









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www.brainlab.com

URGENT FIELD SAFETY NOTICE / PRODUCT NOTIFICATION

Subject:

Under specific circumstances, patient records from unrelated individuals

are automatically merged into one patient record.

Product Reference:

Origin Data Management software versions 3.1.0, 3.1.1, 3.1.2, 3.2.0, 3.2.1

UDI-DI: 04056481145118 (ODM v. 3.1) & 04056481146078 (ODM v. 3.2).

European Single Registration Number: DE-MF-000006183

Date of Notification:

January 22, 2025

Individual Notifying:

Kasyoka Kilonzo, Vigilance Manager

Brainlab Identifier:

CAPA-20250117-002791

Type of action:

Advice regarding use of device; Device modification

We are writing to inform you of a potential safety issue when using **Brainlab Origin Data Management** (ODM) software versions 3.1 or 3.2, the intermediate actions users shall apply to avoid the issue, and the corrective actions that Brainlab is taking to correct this issue.

Effect:

Under certain circumstances, it can occur that patient records from unrelated individuals are automatically merged into one patient record without user notification.

Circumstances in which the issue occurs:

The problem occurs if specific workflows are applied either in the Brainlab Patient Selection application, OR in a Hospital Information System (HIS) that is connected to the above-listed versions of Brainlab ODM software:

- If the Patient ID is changed via Merge or Edit function AND subsequently only the Gender of that patient record is changed, OR,
- If the Patient ID of one patient record is changed from its original value to a new value AND subsequently, this original value is applied (via Merge or Edit function) as the target Patient ID of another patient record.

For a more detailed description of the individual steps that lead to this error, please refer to Appendix 1.

Potential Risk:

Due to this issue, for example, data from Patient_A may be automatically and incorrectly merged into an unrelated Patient_B by the **ODM** software, which leads to:

- the unintended display of data from Patient_A in Patient_B. (Brainlab Data Selection, Figure 1)
- the unintended removal of Patient_A from the patient list. (Brainlab Patient Selection, Figure 2)

NOTE: Initially, only the way the data is displayed for the user in the Brainlab system is affected. However, if the data is exported, the changes are applied to the exported DICOM instances.

If the automatic erroneous merging of data from two unrelated patient records is not detected by the user in the subsequent steps of treatment preparation, and data from Patient_A is used to make clinical decisions for Patient_B, this could, in a worst-case scenario result in **treatment error or serious injury**.

At the time of writing, there has been no reported negative clinical effect on patient treatment due to this issue.





Figure 1: A treatment plan belonging to Patient_A (pink) is merged into Patient_B (yellow).



Figure 2: When searching for Patient_A, Patient_B appears in the search results. Patient_A is not deleted but contained in Patient_B.

User Corrective Action:

According to our records, at least one of the affected software versions is installed at your site.

Therefore, when handling patient data intended to be used with Brainlab Software, adhere to the following instructions:

Sequence 1 (Gender)

- Do not edit only the Gender field of any already merged/edited patient record. (In the Patient Selection application, such a patient record is displayed with a Restore button next to it.)
- For patient records that have not already been merged/edited, adapt all necessary fields
 including Gender in one single operation using Edit. Only then can you merge additional
 patient records to the edited patient record, if applicable. (In the Patient Selection application,
 such a patient record does not have a Restore button next to it.)

Sequence 2 (ID)

 Do not edit a Patient ID to a value that was the original ID of a previously merged/edited unrelated patient record.

To **verify whether a Patient ID has been previously used**, perform the following steps before making any edits that affect **Patient ID**:

- Search for the Patient ID that you want to use as the target ID in the search field in Patient Selection (do not use the Advanced Search).
- 2. If entries with the **Restore** button are shown in the patient list,
 - AND the searched Patient ID is not displayed
 - **AND** the **Patient Name** does **NOT** correspond to the individual intended to be treated, do not proceed with editing or merging and contact Brainlab support.



For merges/edits originating externally from a Hospital Information System (HIS) that is connected to the above-listed versions of Brainlab **ODM** software:

Contact your HIS administrator (for the ADT interface) and clarify whether ADT A40 (merge
patient) messages are used to edit Patient IDs in the system. If Patient IDs are changed via
ADT A40 messages, contact Brainlab support so that we can verify whether our system is
reacting to the ADT A40 messages. If not, you are not affected by the software anomaly via this
route.

In general:

Ensure that treatment plans have meaningful names to enable clear identification.
 See Figure 3 for an example.

Before patient treatment, always:

- · Verify that the name of the data set and/or treatment plan and its date are correct.
- Verify that the images and/or plan are correct for the intended treatment.

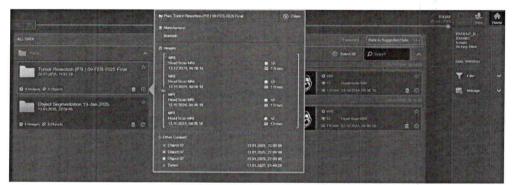


Figure 3: Example of a meaningful **Plan Name** that will enable better detection if the issue occurs. Abbreviation "**P.B.**" indicates the initials of the patient name, in this case Patient_B.

Brainlab Corrective Action:

- 1. Potentially affected customers receive this product notification information.
- 2. Brainlab will provide a software solution, in which the described issue is corrected, to all affected customers. Depending on the regulatory clearance in your market, Brainlab will actively contact you as early as May 2025 to schedule the update.

Please advise the appropriate personnel working in your department of the content of this letter.

We sincerely apologize for any inconvenience and thank you in advance for your cooperation.

If you require further clarification, feel free to contact your local Brainlab Customer Support Representative.

Customer Hotline: +49 89 99 15 68 1044 or +1 800 597 5911 (for US customers)

E-mail: support@brainlab.com (for US customers: us.support@brainlab.com)

Fax: Brainlab AG: +49 89 99 15 68 5033

Address: Brainlab AG (headquarters): Olof-Palme-Strasse 9, 81829 München, Germany



January 22, 2025 Kind Regards,



Kasyoka Kilonzo, Vigilance Manager brainlab.vigilance@brainlab.com

Europe: The undersign confirms that this notice has been notified to the appropriate Regulatory Agency in Europe.

Appendix 1 - Detailed description of the individual steps that lead to this error

Important! Do not recreate the below operations as they will trigger the issue in your software.

Sequence 1 (Gender)

a. Change the ID of a patient record using the Merge/Edit functions, i.e.:

Via Merge:	Via Edit:
- Under Manage, select Merge.	- Under Manage, select Edit.
- Select the patient records you wish to merge from	- Select the ID field and change the
the patient list and select Merge.	existing value.
- In the dialog that opens, select the target patient.	- Select Done to save.
NOTE: After the merge, all data is stored under the	
selected (target patient record's) Name and ID.	
- Select OK to confirm.	

- b. Select this patient record (now shown with a Restore button next to it)
- c. Under Manage, select Edit.
- d. Select the desired Gender.
- e. Select Done to save.

(The next **Merge/Edit** of an unrelated patient record will cause the automatic incorrect merge of unrelated patient records. The described issues will become apparent only after the system is restarted.)

Sequence 2 (ID)

- a. Select a patient record.
- b. Under Manage, select Edit.
- Select the ID field and type in a value that was the original ID of a previously merged/edited unrelated patient record.
 - (The issue will occur regardless of any changes to other fields at the same time).
- d. Select Done to save.

(The described issues will become apparent only after the system is restarted.)

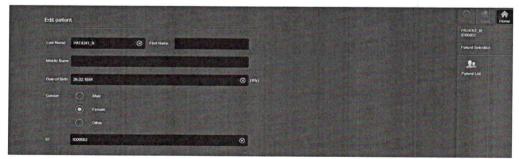


Figure 4: Edit dialog to change patient information