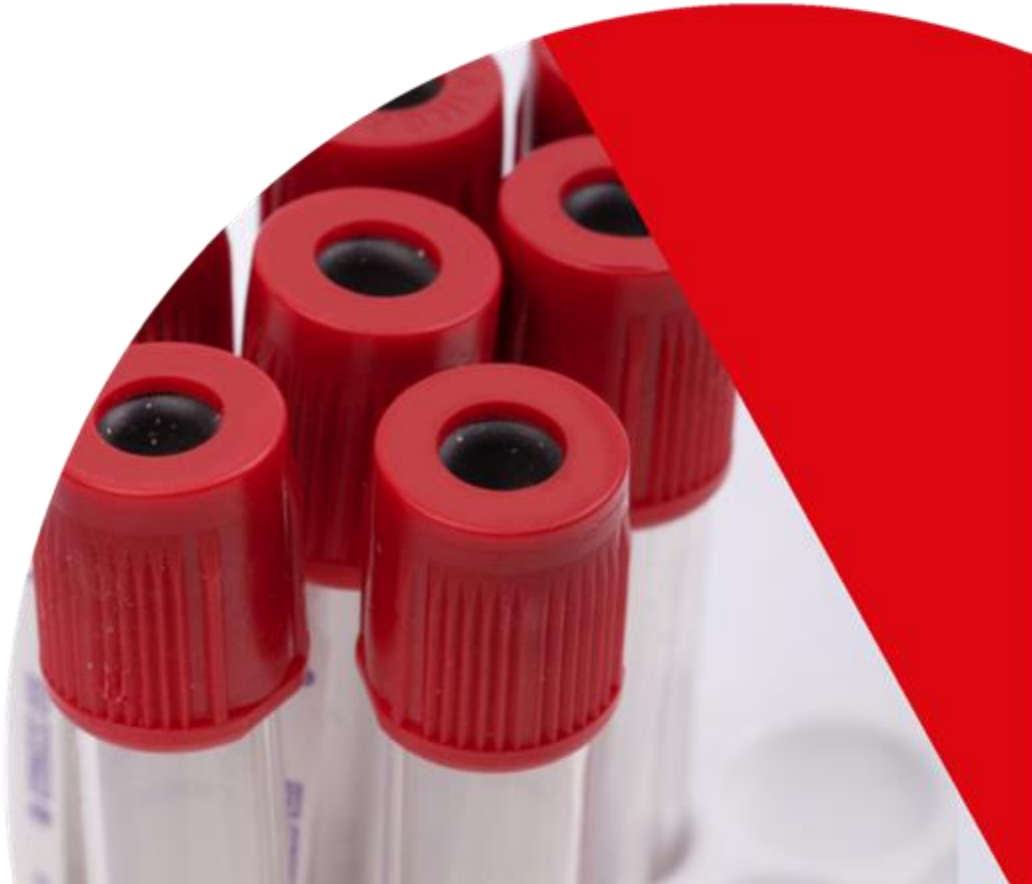
IVDR Update Webinar

09 August 2016

Erica Conway
Global Head - IVD



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IVDR Overview - Update

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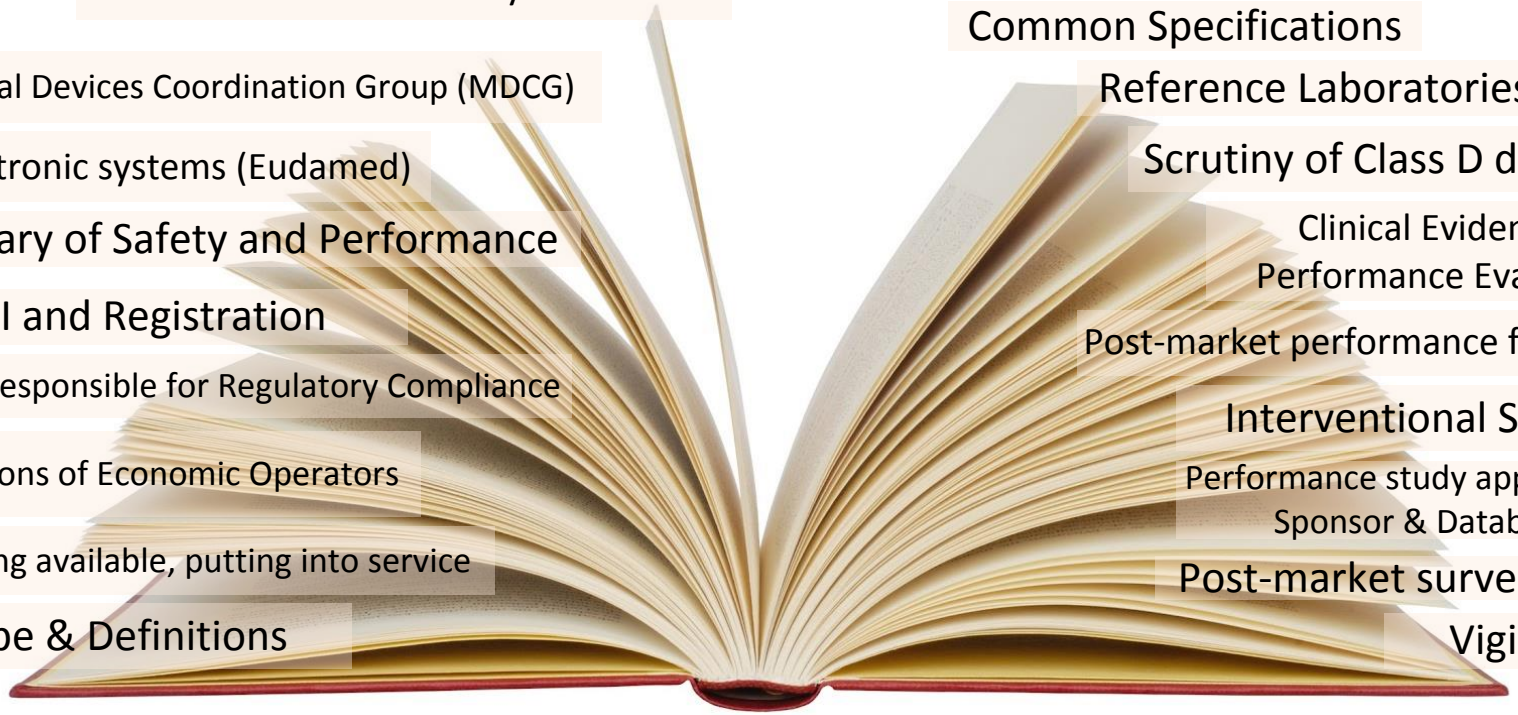

Classification & Conformity Assessment

Medical Devices Coordination Group (MDCG)

Electronic systems (Eudamed)

Summary of Safety and Performance

UDI and Registration

Person Responsible for Regulatory Compliance

Obligations of Economic Operators

Making available, putting into service

Scope & Definitions

Notified Bodies

Common Specifications

Reference Laboratories

Scrutiny of Class D devices

Clinical Evidence & Performance Evaluation

Post-market performance follow-up

Interventional Studies

Performance study applications; Sponsor & Database

Post-market surveillance

Vigilance

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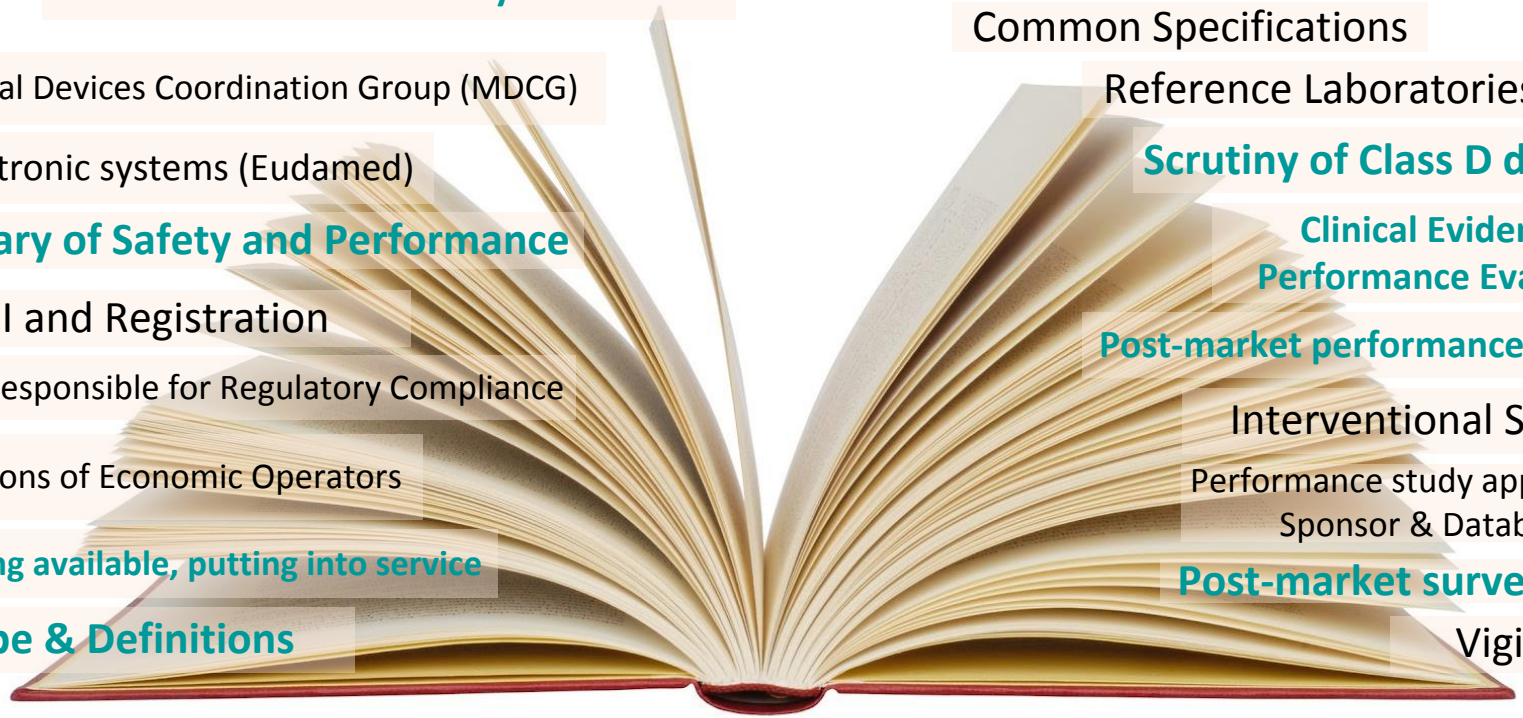

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Overview

Key impacts for IVDs under the IVDR

1. Time line for IVDR
2. Scope
3. Classification
4. Conformity Assessment
5. Clinical Evidence
6. Scrutiny
7. Post-market
8. Other aspects of significant impact

- What now…

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1. Time line

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IVDR update

Medical devices: deal reached on new EU rules

25/05/2016 | 20:15 | Press release | 283/16 | Health

On 25 May 2016, the EU agreed new rules on medical devices and in vitro diagnostic medical devices.

The Netherlands presidency of the Council and representatives of the European Parliament reached a political agreement. It is still subject to the approval by the Council's Permanent Representatives Committee and of the Parliament's ENVI committee.

- Political agreement has been reached between Council and Parliament
- Consolidated *draft* text issued dated 15-Jun; clean version 27-Jun-2016
- Translation of text and legal linguist review
- Formal adoption of text by Council and Parliament – expected Sep/Oct 2016
- Publication in the *Official Journal of the EU*

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IVDR update

Medical devices: deal reached on new EU rules

Alignment of the MDR and IVDR

- '…There are specific features of *in vitro* diagnostic medical devices, in particular in terms of risk classification, conformity assessment procedures and clinical evidence, and of the *in vitro* diagnostic medical device sector which require the adoption of a specific legislation, distinct from the legislation on other medical devices,
- whereas the horizontal aspects common to both sectors should be aligned.'

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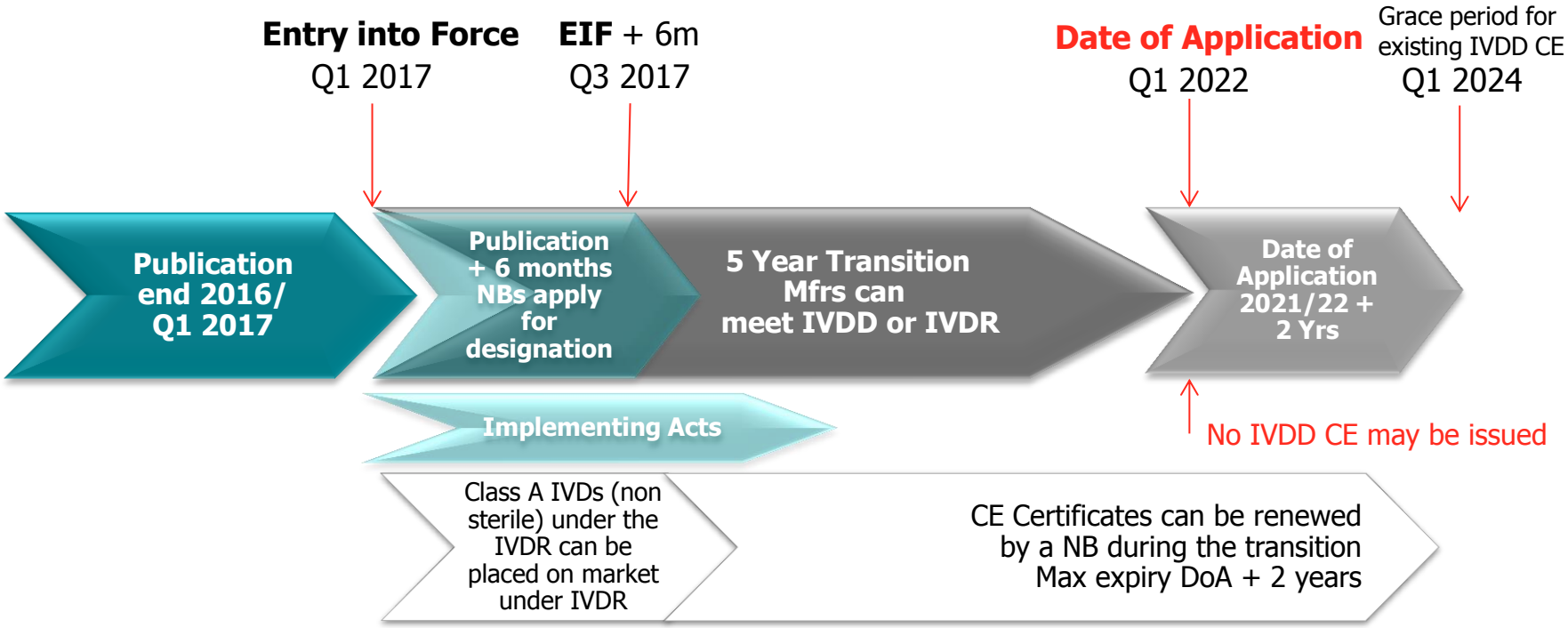
Transitional arrangements for IVDR



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2. Scope

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Scope – Definitions that apply

Medical Device

- 'medical device' means 'medical device' as defined in Regulation (EU) No [Reference to the future Regulation on medical devices].

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Scope – Definitions that apply

Medical Device

- 'medical device' means [illegible] as d[illegible] [Re[illegible] me[illegible]

In Vitro Diagnostic MD

- …any medical device which is a reagent, reagent product, calibrator, control material, kit, instrument, apparatus, equipment, **software** or system,
- whether used alone or in combination, intended…to be used *in vitro* for the examination of specimens, including blood and tissue donations… from the human body,
- solely or principally for…providing information..

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Scope – Definitions that apply

Medical Device

- 'medical device' means [illegible] as d[illegible] [Re[illegible] me[illegible]

In Vitro Diagnostic MD

- concerning a physiological or pathological **process or** state;
- concerning congenital **physical or mental impairments**;
- **concerning the predisposition to a medical condition or a disease;**
- to determine the safety and compatibility with potential recipients;
- **to predict treatment response or reactions;**
- to **define or** monitor therapeutic measures.

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What is NOT an IVD…

- (a) products for **general laboratory use** or **research-use only products**, unless such products, in view of their characteristics, are specifically intended by their manufacturer to be used for in vitro diagnostic examination;
- (b) **invasive sampling devices** or those which are **directly applied to the human body for the purpose of obtaining a specimen**;
- (c) internationally certified reference materials;
- (d) materials used for external quality assessment schemes.

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Consideration of scope…

Placing on the market

- *'placing on the market'* means the first **making available** of a device, other than a device for performance study, **on the Union market**;

- *'making available on the market'* means any **supply** of a device, other than a device for performance study, for **distribution**, **consumption or use** on the Union market in the course of a commercial activity, whether in return for payment or free of charge;

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- A device offered by means of *information society services* as defined in Article 1(2) of Directive 98/34/EC to a natural or legal person established in the Union shall comply with this Regulation

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3. Classification

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New Classification of IVDs by risk

- Risk classes A, B, C & D (where D is the highest) – Annex VII
- Implementing acts and Guidance
- Borderline issues will be referred to the CA of the Manufacturer or Authorised Rep; if this is different to the CA of the NB, they will consult
- Role of Medical Device Coordination Group (MDCG)
- If there is more than one potential application for a test, and the intended use is of the lower classification, there must be a specific exclusion in the labelling
- Where more than one rule applies, the highest classification will be used.

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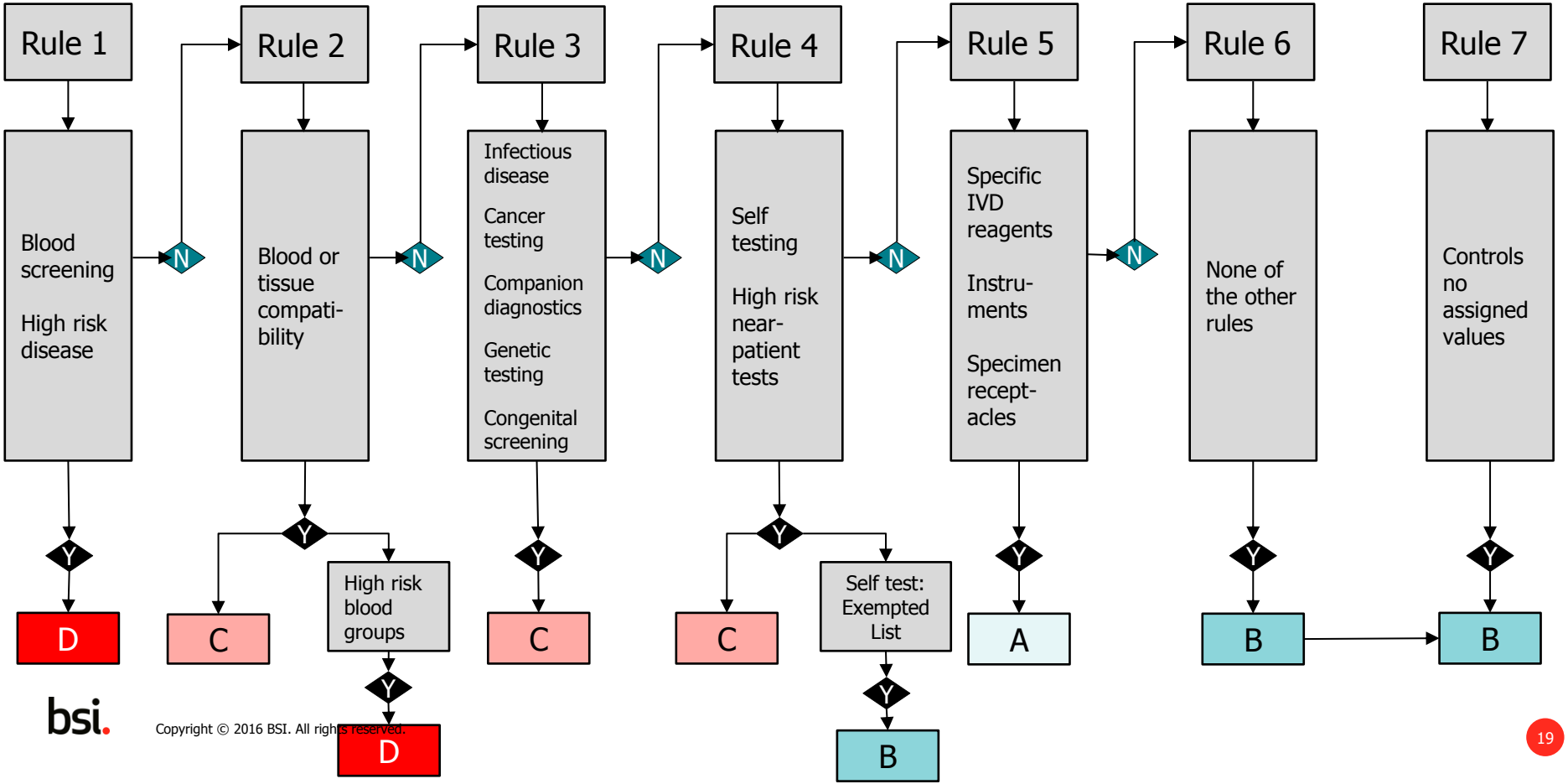
Classification



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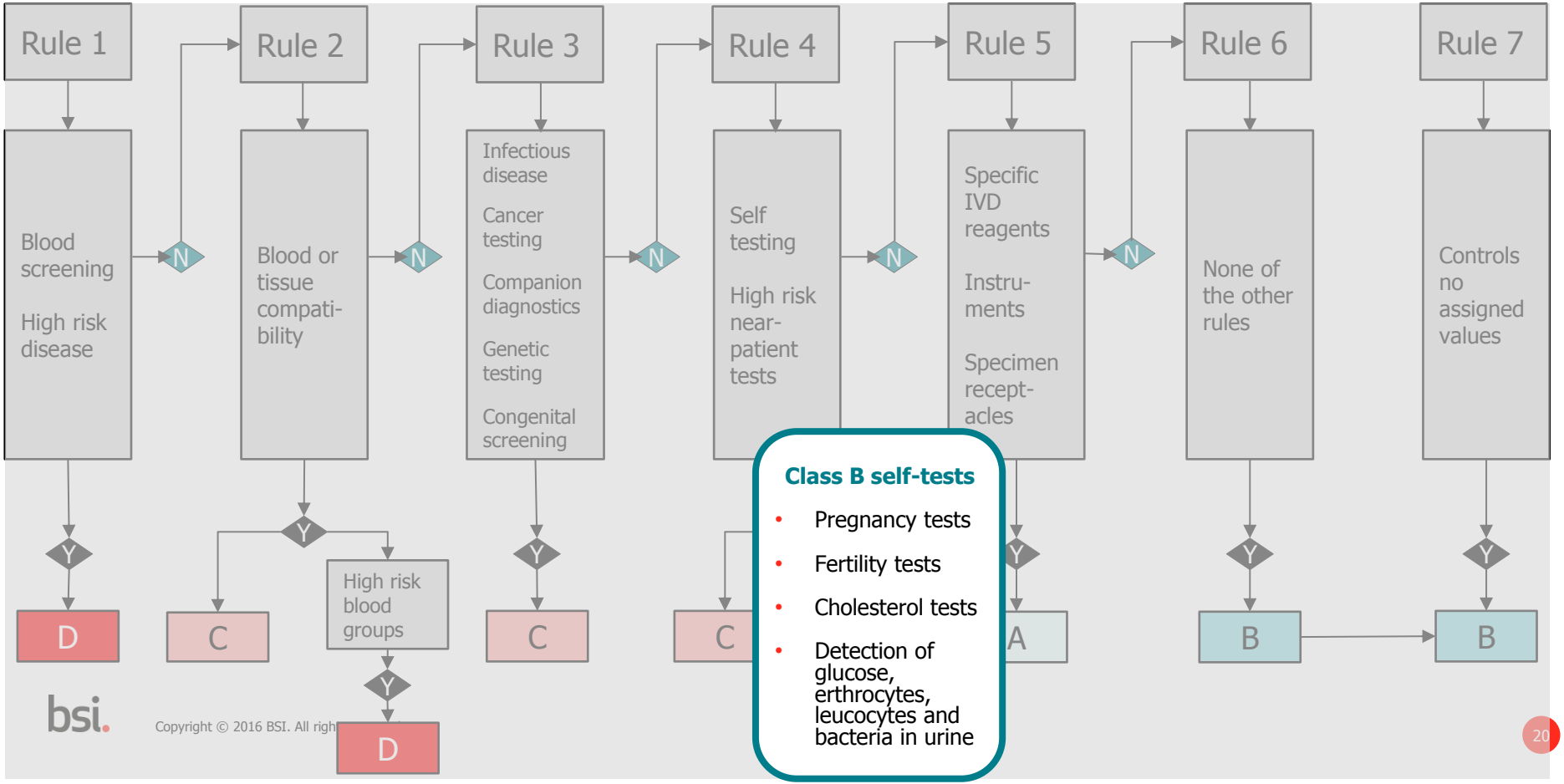

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New classes of IVD devices

Class D

High public health risk, high personal risk

Examples

- HIV 1/2,
- Hepatitis C virus
- Hepatitis B virus
- HTLV I/II
- Blood grouping ABO, Rhesus (including RHW1), Kell, Kidd and Duffy systems
- CHAGAS
- Syphilis (used to screen blood donations)

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Class C

High personal risk, moderate to low public health risk

- Syphilis (diagnosis only)
- Neonatal screening for metabolic disorders e.g. PKU
- Rubella
- Cancer markers
- Genetic tests
- Companion diagnostics
- Blood glucose meters/strips
- Blood gas analysers
- Self tests

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Class B

Moderate to low personal risk, low public health risk

- Thyroid function
- Infertility assays
- Clinical chemistry

- Self-test devices listed as not Class C

- **'Near patient tests' are classified in their own right**

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Class A

Low personal risk, low public health risk

- Accessories
- Wash buffers
- Specimen receptacles
- Instruments
- Culture media

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4. Conformity Assessment

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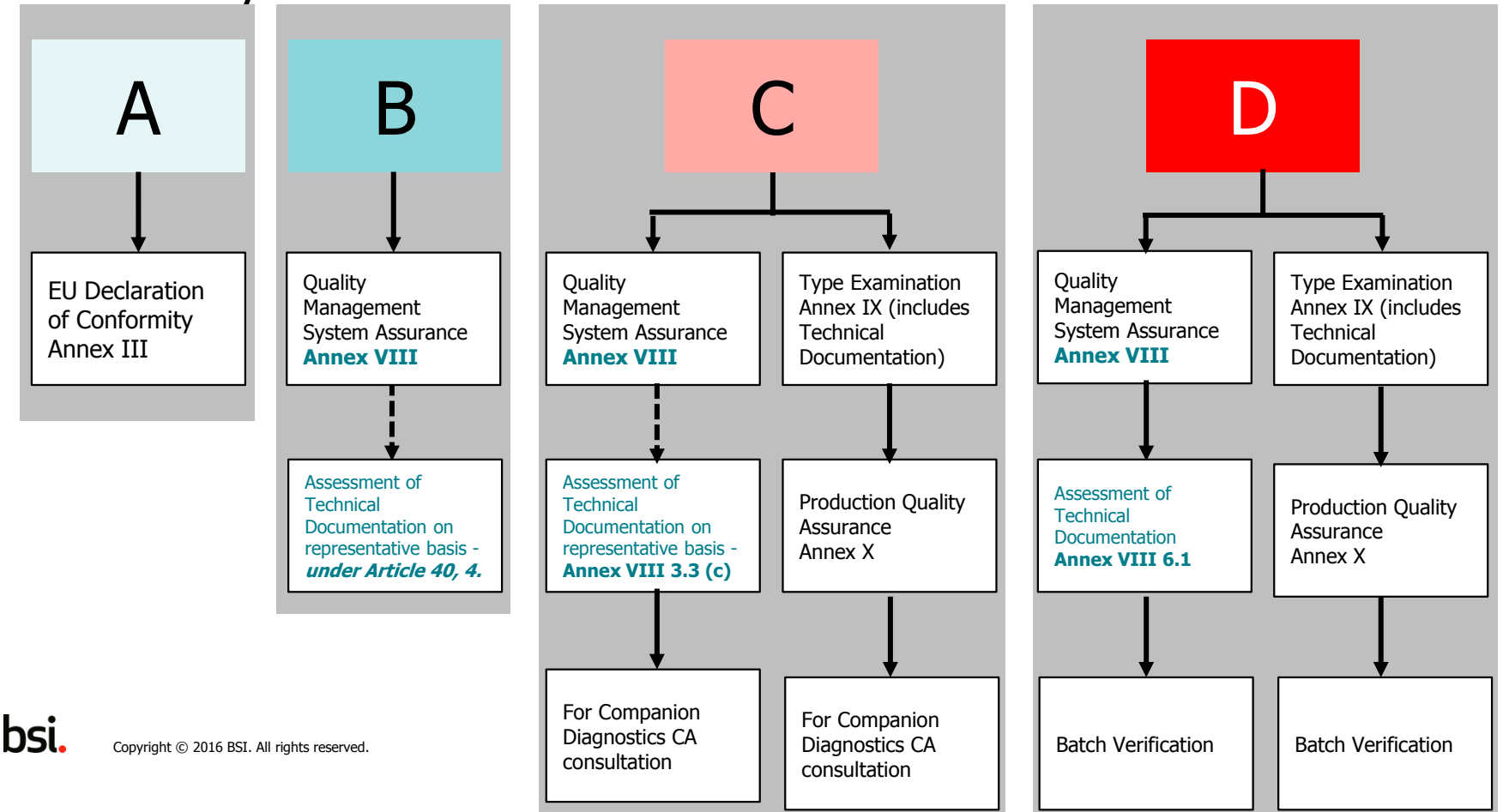
Conformity Assessment



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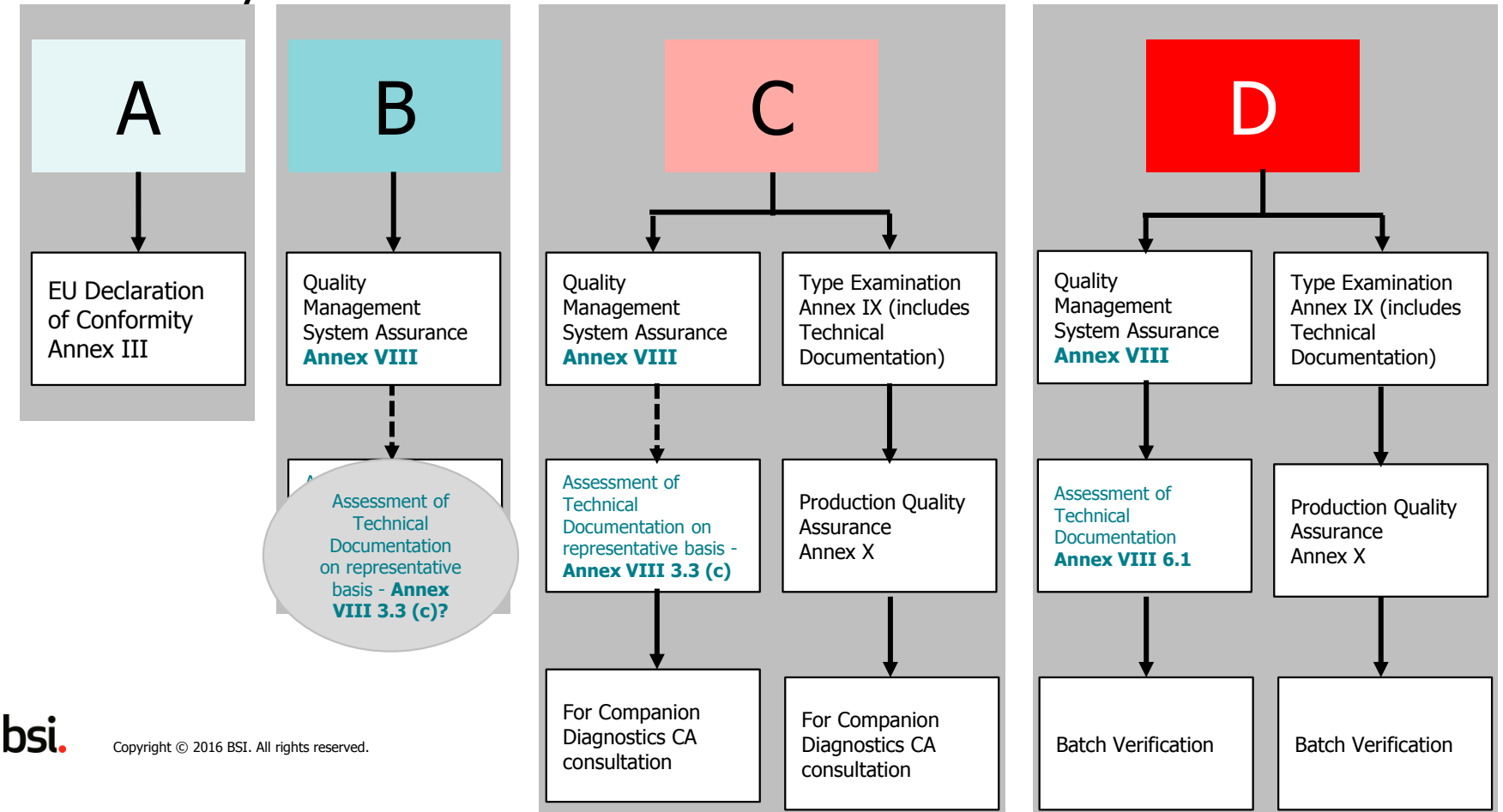

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Certificates issued under Annex VIII

Class B & C devices

- EU Quality Management System certificate (Annex VIII, sec 3 & 4)
    - Accompanied by assessment of technical documentation on representative basis for each generic device group (Likely needed for Class B devices, *to be confirmed*)

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Certificates issued under Annex VIII

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    for each generic dev
    (Likely needed for Cl
    confirmed)

Class D & Others specified*

- EU Quality Management System certificate
  (Annex VIII, sec 3 & 4)
- EU Technical Documentation Assessment certificate
  (Annex VIII, sec 5)
  - For each Class D device to be placed on the market
  - Reference laboratory will verify claimed performance and Common Specification requirements – *needs to be positive outcome*
  - MDCG consultation if no Common Specification
  - Verification of manufactured batches (Class D)

*Self-test and near patient tests, Classed B-D; Companion Diagnostics

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  - Reference laboratory will verify claimed performance and Common Specification requirements – *needs to be positive outcome*
  - MDCG consultation if no Common Specification
  - Verification of manufactured batches (Class D)
- ***OR*** EU Technical Documentation Assessment certificate
  (Annex VIII, sec 6)
  - For each device* to be placed on the market
  - Drug consultation for Companion Diagnostics

*Self-test and near patient tests, Classed B-D; Companion Diagnostics

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5. Clinical Evidence

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'Clinical benefit' consideration

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Clinical Evidence

- New requirement for Clinical Evidence
- ***Clinical evidence*** *= clinical data and performance evaluation results, pertaining to a device of sufficient amount and quality to allow a qualified assessment of whether the device achieves the intended clinical benefit and safety, when used as intended by the manufacturer*

- Based on harmonised guidance
- **GHTF documents** (IMDRF archive):
  - Clinical Performance Studies for In Vitro Diagnostic Medical Devices
  - Clinical Evidence for IVD Medical Devices – Key Definitions and Concepts
  - Clinical Evidence for IVD Medical Devices – Scientific Validity Determination and Performance Evaluation

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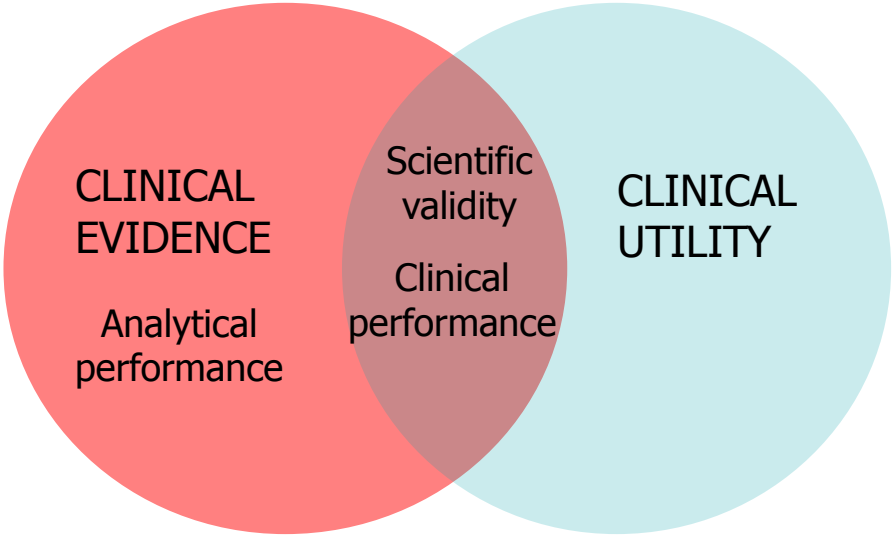

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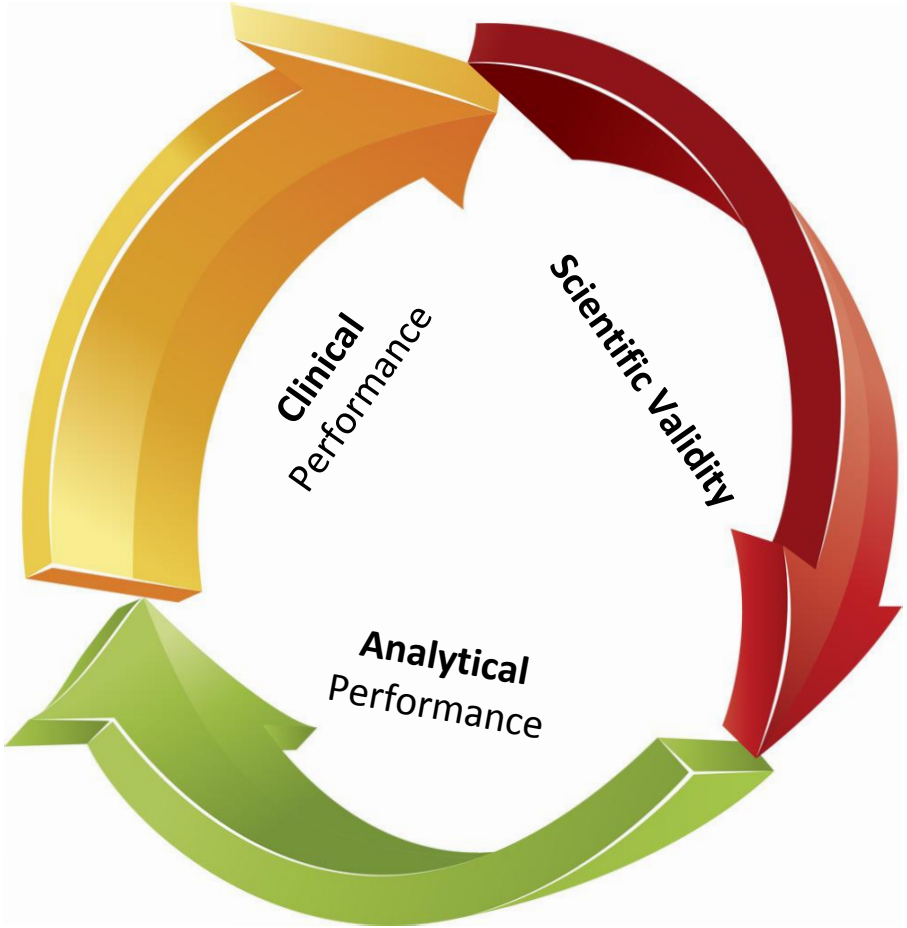
Performance Evaluation

- Sum total = **Clinical Evidence**
- ***Process*** of Performance Evaluation
- Done according to a **Performance Evaluation Plan**
- Collated as a **Performance Evaluation Report**
- Continuous during life-time of the device



Scientific Validity

Refers to the association of an analyte to a clinical condition or physiological state

For established analytes, this may be from literature; but for novel analytes or companion diagnostics this would need to be established

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Analytical Performance

Refers to the ability of an IVD medical device to correctly detect and measure a particular analyte
Performance requirements similar to IVD Directive essential requirements

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Clinical Performance

Ability to yield results that relate to a particular clinical condition or physiological state for the intended use and in accordance with target population, and where applicable to the intended user

Data to support diagnostic accuracy compared to reference test; information related to expected values

Scientific Validity

Refers to the association of an analyte to a clinical condition or physiological state

For established analytes, this may be from literature; but for novel analytes or companion diagnostics this would need to be established

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Expectations for Performance

Performance Evaluation Plan, as well as a file of Clinical Evidence will form part of the Technical Documentation, as a **Performance Evaluation Report**

- **Clinical Performance studies** may be required, unless justified

Interventional performance studies – new requirements

- In line with clinical trial expectations for clinical trials of medicinal products

Clinical Evidence will need to be updated

- Consolidated text states if there has been a 'trigger', then the PE Report will need updating

Post-market Surveillance and **Post-market Performance Follow-up (PMPF)**

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6. Scrutiny

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Additional scrutiny of High Risk devices

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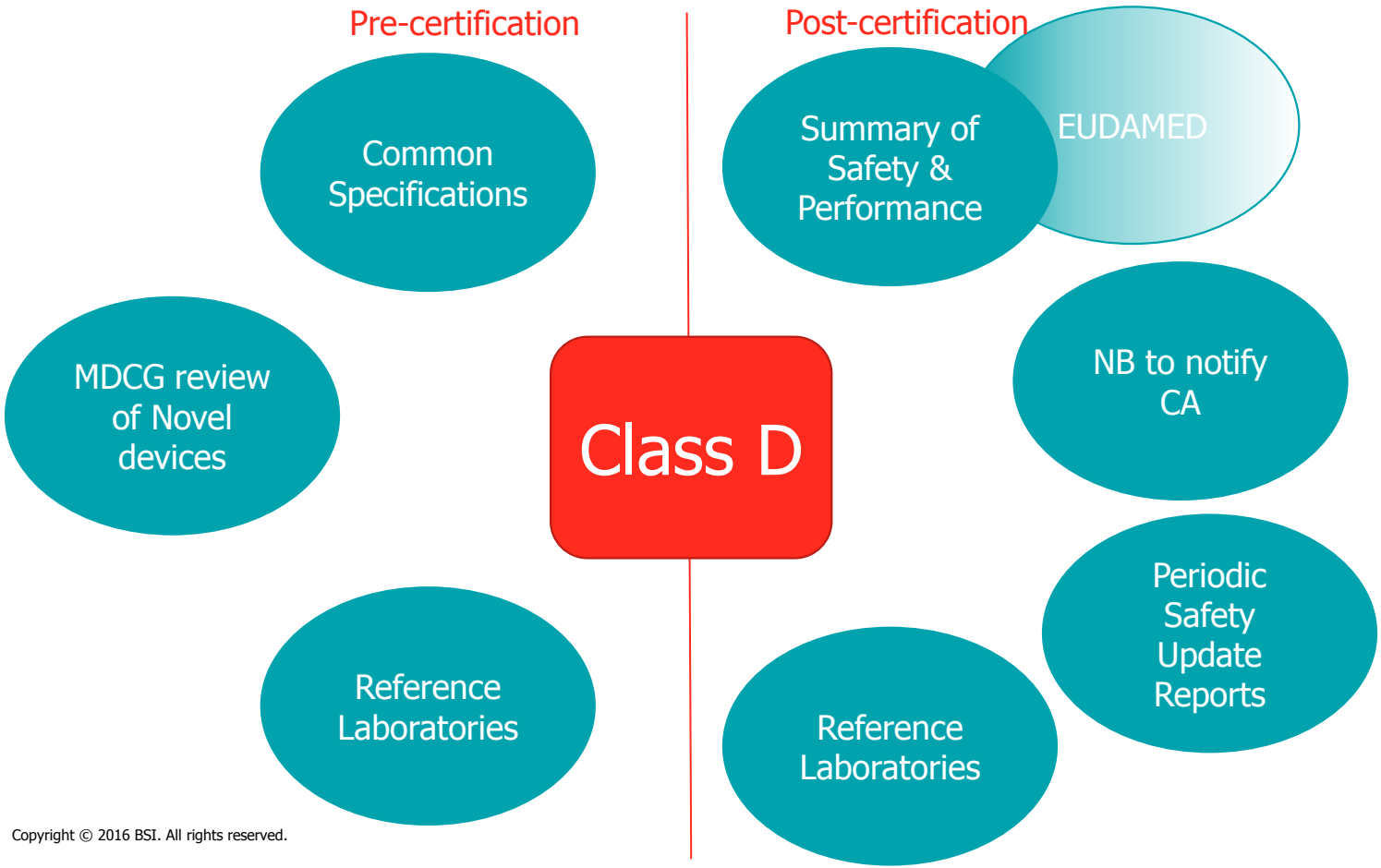

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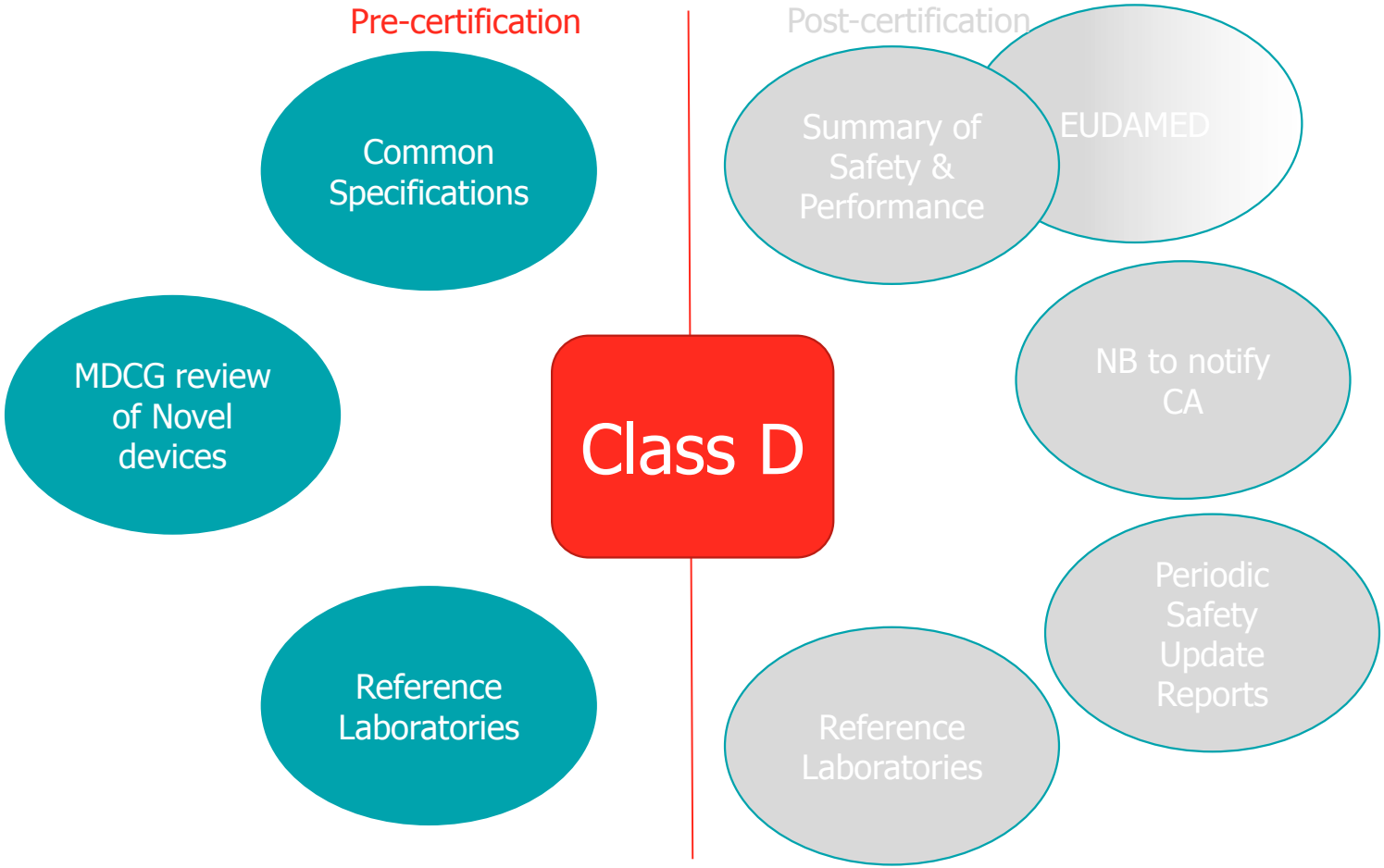
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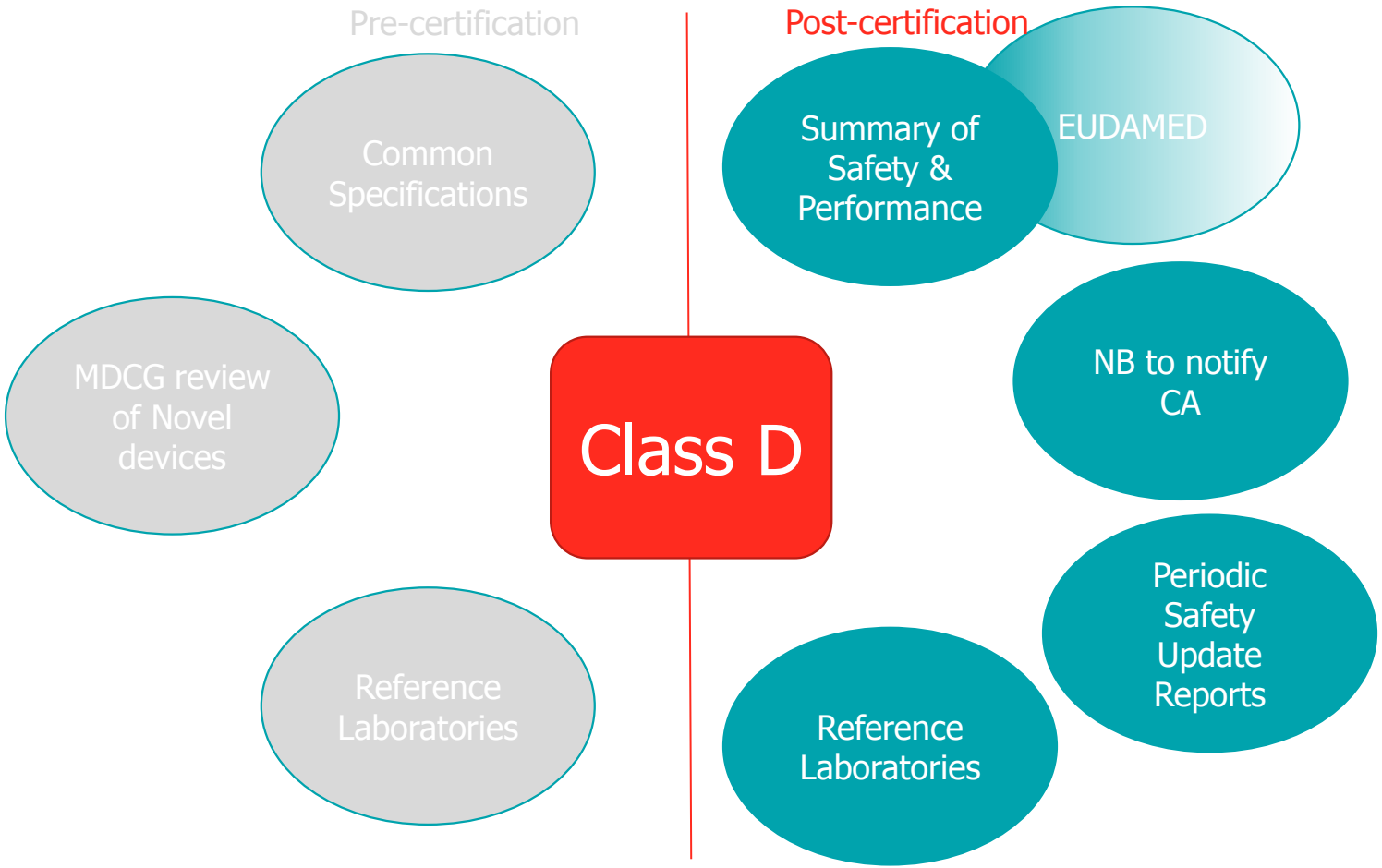
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7. Post-market

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Post-market obligations

- **Vigilance** requirements
  - Incident Reporting
  - Trending
- **Post-market Surveillance Plan & Post-market Surveillance**
  - Reviewed as part of Surveillance visits
  - Post-market surveillance Report (Class A & B); or
  - Periodic Safety Update Reports (Class C & D)
- **Post-market Performance Follow-up (PMPF)**
- For Class C & D devices, updates to the **Summary of Safety and Performance**, at least annually
  - Will be publicly available

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Certificates issued under Annex VIII - *surveillance*

Class C

- EU Quality Management System certificate (Annex VIII, sec 3 & 4)
- Substantial changes
  - Potential audit or assessment
  - Supplement to EU QMS certificate
- Annual surveillance audits
  - Inc Post-market Surveillance Plan
- Unannounced on-site audits, at least every 5 years
- Sampling of technical documentation

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- Unannounced on-site audits, at least every 5 years
- Sampling of technical documentation

Class D & Others specified*

- EU Quality Management System certificate (Annex VIII, sec 3 & 4)
- Surveillance as per C (without sampling)
- EU Technical Documentation Assessment certificate (Annex VIII, sec 5 or 6)
- Significant device changes
  - Potential conformity assessment or supplement to EU Tech Doc Assessment certificate
  - Possible Ref Lab consultation if changes impact compliance with the Common Specification (Class D)
- On-going verification of manufactured batches (Class D)

*Self-test and near patient tests, Classed B-D; Companion Diagnostics

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8. Other aspects of significant impact

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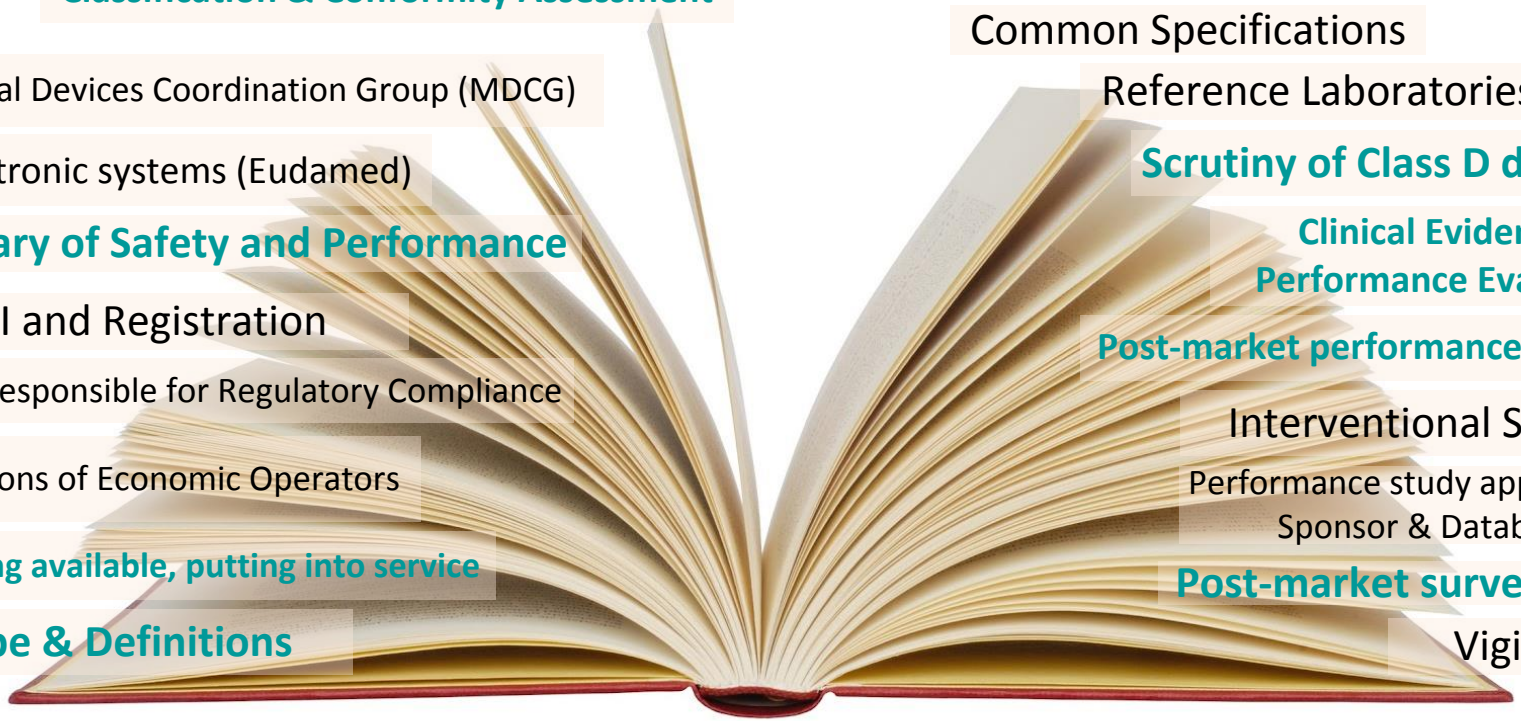

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Post-market surveillance

Vigilance

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Other significant impacts

- New General Safety and Performance requirements
- Requirements and increased scrutiny of Notified Bodies
- Increased obligations of Economic Operators
  - Inc. Authorised Representatives, Importers, Distributors
- Person Responsible for Regulatory Compliance
  - Manufacturers (or Auth Rep) with Degree + 1 yr IVD experience; or 4 yrs IVD experience
  - *See BSI Webinar: Requirements for a 'Person Responsible for Regulatory Compliance' 23 Jun 2015*
- UDI and device registration
  - Impact on labelling; phased in under the IVDR
  - *See BSI Webinar "Medical device regulation impact on manufacturer resources"*
- Requirements for interventional performance studies (or studies with risks to subjects)
- Reference Laboratories
- Vigilance

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9. What now…

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What now…

Notified Bodies

- Preparing themselves for designation
- NBOG codes will be needed

Manufacturers

- Project Plan according to current texts
  - **IVDR:** http://data.consilium.europa.eu/doc/document/ST-10618-2016-INIT/en/pdf
  - MDR: http://data.consilium.europa.eu/doc/document/ST-10617-2016-INIT/en/pdf
  - Engage with your/a Notified Body
- Use the Transition Period effectively!

Other Economic Operators

- Authorised Representatives, Importers and Distributors need to plan to meet new obligations

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From BSI…

Please find our WEBINARS:

- www.bsigroup.com/en-GB/medical-devices/resources/webinars/

US Road-shows

- Oct-03 (Boston, MA), Oct-05 (Bridgewater, NJ),
  Oct-10 (Santa Clara, CA), Oct-11 (Newport Beach, CA)
- www.bsiroadshow.com

Road-shows in the **UK**

- Locations and dates being confirmed for November

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Any Questions?

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