2nd African Regulatory Forum on Medical Diagnostics – IVD Regulatory Framework

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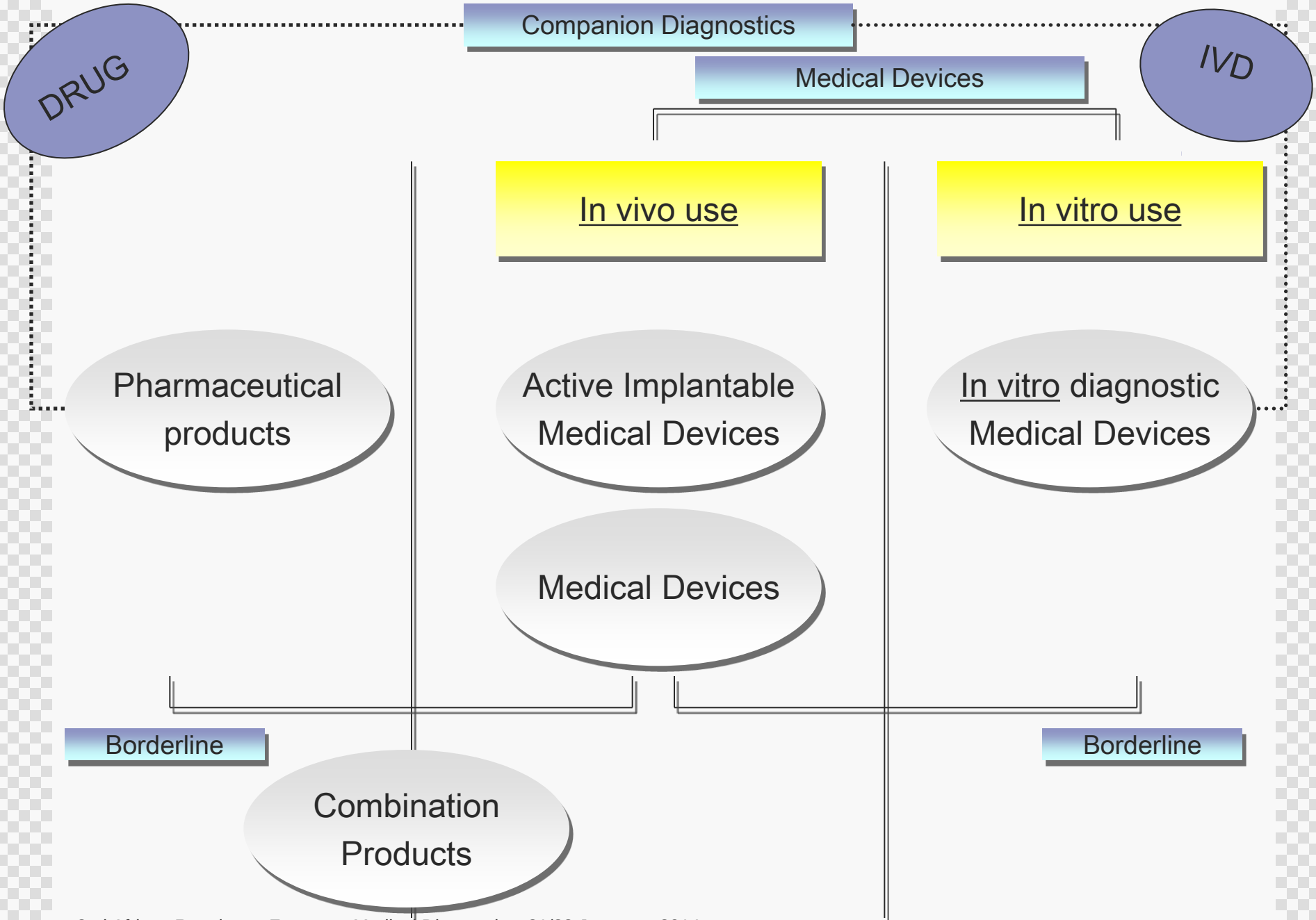
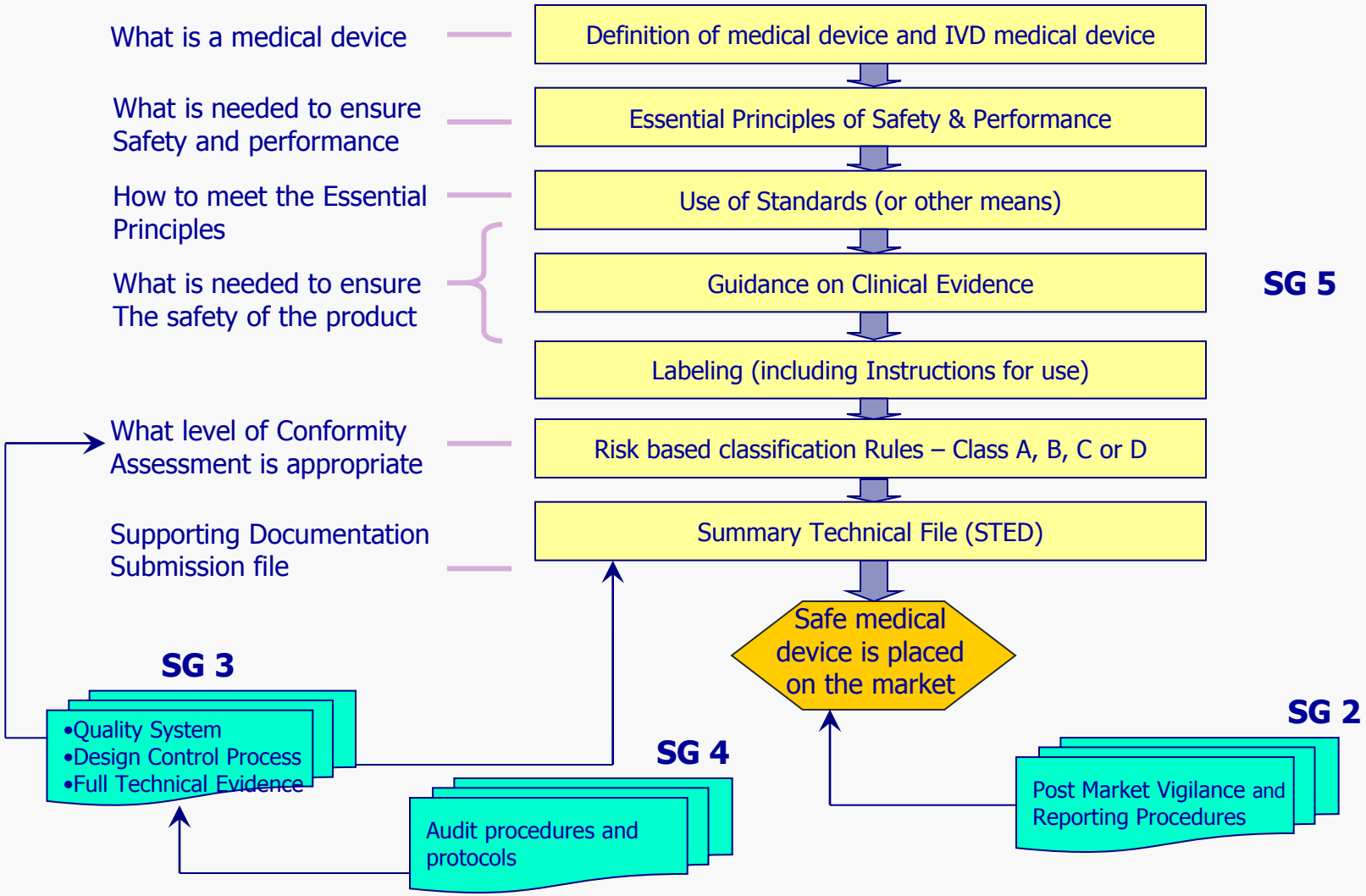
Capetown – 21/23 January 2014

- Medicines
  - Medical diagnostics
    - Pharmaceuticals
      - Medical Devices
        - IVD Medical devices……
- Are these all the same?
  - Can they have one regulatory approach/framework?


DRUG
Companion Diagnostics
Medical Devices
IVD
In vivo use
In vitro use
Pharmaceutical products
Active Implantable Medical Devices
In vitro diagnostic Medical Devices
Medical Devices
Borderline
Borderline
Combination Products

GHTF regulatory model



GHTF and IMDRF

All guidance documents developed by GHTF can now be found at www.imdrf.org – GHTF archive.

Regulatory Framework for IVD medical devices

- IVDs are different from the other medical devices – different content needed in most of the documents for IVD.
  - When developing regulations think about having separate regulations for IVDs and MDs or have different sections addressing IVDs and MDs.
- Within GHTF-SG1 – (premarket) as of 2002 there was a growing understanding that IVDs needed different content
- First IVD specific document was a rules based risk classification system – *GHTF/SG1/N045 Principles of In Vitro Diagnostic Medical Devices Classification*

Criteria for Classification for IVD medical devices

The Classification of an IVD medical device is based on the following criteria:

- the intended use and indications for use as specified by the manufacturer (including but not limited to specific disorder, populations, condition or risk factor for which the test is intended)
- the technical/scientific/medical expertise of the intended user (lay person or healthcare professional)
- the importance of the information to the diagnosis (sole determinant or one of several), taking into consideration the natural history of the disease or disorder including presenting signs and symptoms which may guide a physician
- the impact of the result (true or false) to the individual and/or to public health

Keep Classification but enhance conformity assessment as appropriate

…….Similarly, the RA or CAB may require a more detailed premarket submission and/or require a more rigorous audit and/or the provision of more performance evaluation data than would normally apply to a device of that risk class when:

- the device incorporates innovative technology;
- an existing compliant device is being proposed for a new intended use;
- the manufacturer's experience level with the type of IVD medical device is limited;
- the device type tends to be associated with an excessive number of adverse events, including use errors;
- the device incorporates innovative or potentially hazardous materials;
- the device type raises specific public health concerns.

Regulatory Framework for IVD medical devices

- In parallel a separate IVD conformity assessment document was created – *GHTF/SG1/N046 Principles of Conformity Assessment for In Vitro Diagnostic (IVD) Medical Devices.*
  - This document was developed in parallel with the Classification document as these two documents are heavily related.

- The third document that clearly needed a separate content was the Summary Technical Documentation (STED) document – *GHTF/SG1/N-63 Summary Technical Documentation (STED) for Demonstrating Conformity to the Essential Principles of Safety and Performance of In Vitro Diagnostic Medical Devices*
  - *This is the document providing guidance for a common registration document (Common submission dossier)*

Premarket use of the STED

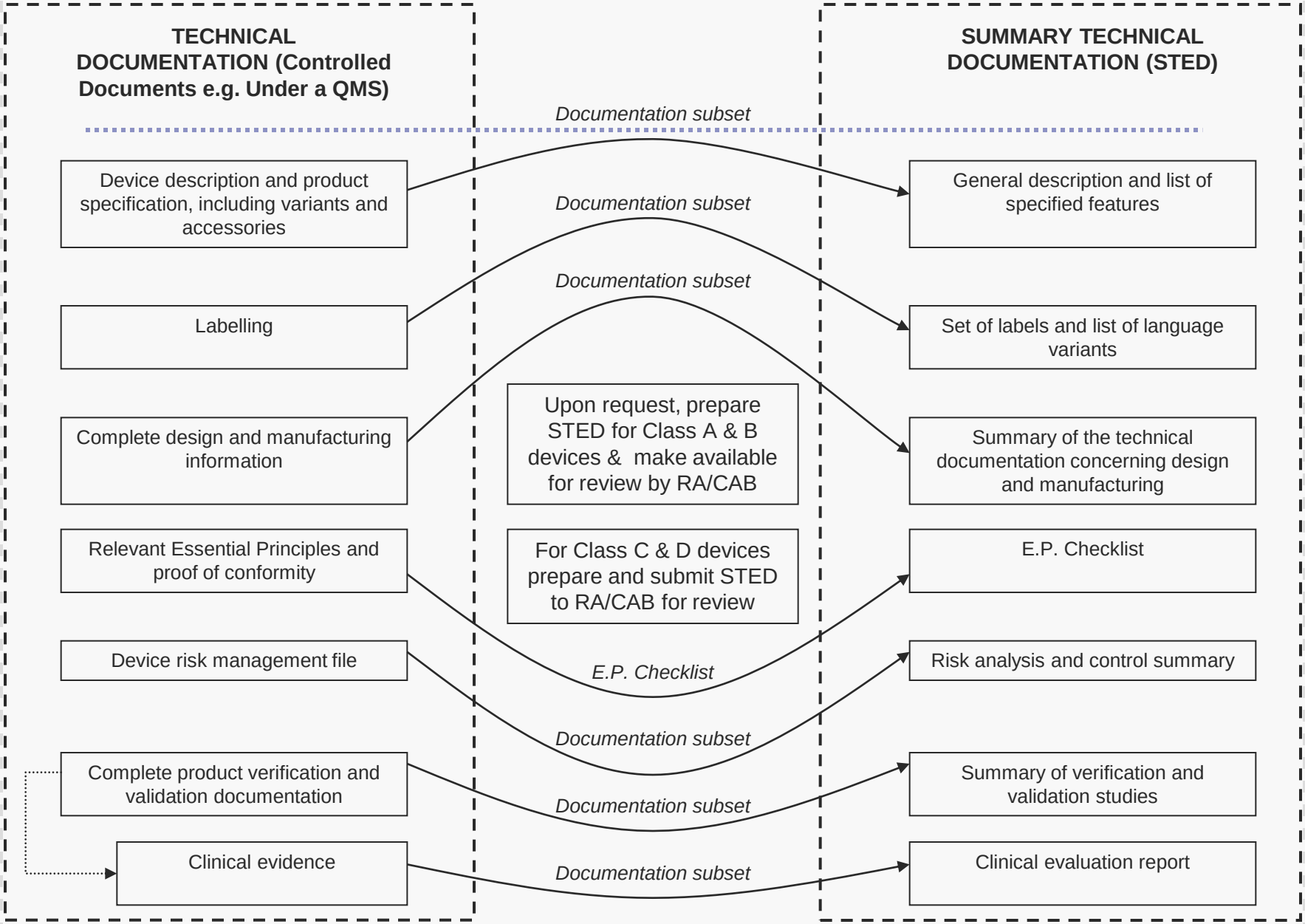


FIGURE 1: PREMARKET USE OF THE STED

STED

A SNAPSHOT IN TIME

↳ BECOMES A RECORD IN THE QMS

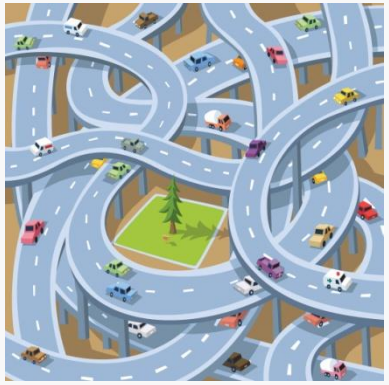
A LIVING DOCUMENT

↳ will not be updated

Depth and detail of the information in the STED will depend on:

a) The classification of the subject IVD medical device

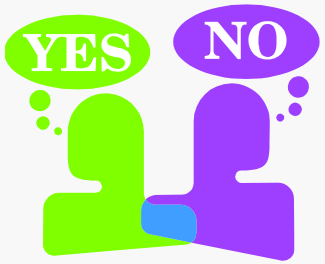
b) The complexity of the subject IVD medical device



Conclusion for STED

- STED is an agreed upon summary of the full Technical documentation.

- Allows manufacturers and RA/CABs to work with a useful set of documents for pre and post-market activities.



- Should help eliminate differences in documentation requirements between jurisdictions allowing patients earlier access to new technologies and treatments.

Regulatory Framework for IVD medical devices

- During the work on the STED document it became evident that also the Essential Principles of Safety and Performance (EP) needed separate wording for IVD medical devices – *GHTF/SG1/N068 Essential Principles of Safety and Performance of Medical Devices*
- The EPs are written in a way that they are technology independent and allow to cover for all IVD medical devices – standards fill in the details (see this afternoon presentation)
  - => This document now contains 6 general principles applicable to all devices and then a section only applicable to medical devices and a section only aplicable to IVD medical devices.

Regulatory Framework for IVD medical devices

- Labelling (labels and Instructions for Use (also called package insert) is another document that clearly needed separate content for medical devices and IVD medical devices – *GHTF/SG1/N070 Label and Instructions for Use for Medical Devices*
  - => the document now contains separate sections for medical devices and IVD medical devices

Regulatory Framework for IVDs and Access to affordable devices

- The AHWP and the PAHWP agreed in their last joint meeting in Taipei that
  - There is no need to develop a separate regulatory framework for affordable access to IVD medical devices or for IVD medial devices used in resource limited settings but
  - Where appropriate additional guidance could be developed to clarify certain aspects of the regulatory framework guidance documents with respect to access to affordable devices as well as the use in resource limited settings

Regulatory Framework for IVDs and Access to affordable devices

- Aspects to be considered in such additional guidance for access to affordable IVD medical devices are :
  - Specific design requirements (clarify some of the EP with regards to affordable devices – eg. POC tests, stability, handling, storage and protection of reagents)
  - Faster access pathways (clarify some of the conformity assessment elements as well as agree on a common submission dossier (STED).

Regulatory Framework for IVDs and Access to affordable devices

- Aspects to be considered in such additional guidance for access to affordable IVD medical devices are :
  - Different approach to clinical performance studies (clarify some of the clinical evidence elements with regards to affordable devices).
  - Labelling (clarify the link of some design elements important for affordable devices in the EP with the labeling of the product)

Clinical Evidence for IVD medical devices

- Because of the different characteristics between MD and IVD MD, GHTF developed separate guidance for MD and IVD MD for clinical evidence.
- Terminology used is different (scientific validity, analytical performance and clinical performance for IVD medical devices).

Why are studies MD and IVD different?

Medical Devices

- Most R&D is done with bench testing/animal testing
- Human subjects only get involved during the clinical trials
- Human subjects always directly involved in the clinical trials -> Potential for direct harm to the human subject in the study

IVD medical devices

- All R&D work is already done using human specimens
- Analytical performance provides already a lot of the required data for IVDs to demonstrate safety and performance
- Clinical performance not always needed, where needed, majority of the studies are done with left over specimens or archived specimens
- Human subject mostly not directly involved – study done on specimen taken from the human body ->no direct harm for the human subject in most of the studies (except for interventional studies or where the specimen collection is of higher risk)

Need for a standard for IVDs on the proper conduct of clinical performance studies?

- ISO 14155 (Clinical investigation of medical devices for human subjects – Good Clinical Practice) excludes IVDs from its scope
- There is no standard for IVDs – in the absence of such a standard some jurisdictions make an atempt to use ISO 14155.
- Given the emergence of the need for clinical evidence in a lot of jurisdictions there is a need to develop an appopriate standard for IVDs related to the conduct of clinical performance studies.
- Based on the outcome of the discussions in September at the AHWP/PAHWP/LSHTM and the developments in Europe a PWI for such a standard was submitted to ISO TC 212 plenary meeting and approved.

Regulatory Framework for IVDs and Access to affordable devices

Besides developing additional guidance on the standard regulatory model documents ensure an appropriate balance between pre-market and post-market elements.

Thank you!

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January 21/23, 2014