IVDR – some good advice

- Short view in the QMS, audits and PMS
- How to do with the performance evaluations

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Presentation of the speaker – Anna-Karin Areskog

- Senior Quality and Regulatory Consultant
- Experiences
  - QA Manager
  - IVDD/IVDR and MDD/MDR
  - GMP, ISO13485, QSR 21CFR 820
  - Internal and external audits

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IVDR transfer process

Qualification and classification
Qualify the device as an In Vitro Diagnostic device and based on the intended use make classificationaccording to IVDR.

1

Gap analysis and portfolio assessment
Gap analysis of device technical documentation, performance evaluation data and quality management system.

2

Transfer strategy and time plan
Development of strategy for implementation, identification of possible conformity route, contact a notified body and creation of overall time plan.

3

Implementation
Detailed implementation plan, identification of resources. Execute implementation actions, development of QMS and technical documentation.

4

Deploy new QMS and PRRC
Establish the role of Person Responsible for Regulatory Compliance (PRRC) in the organization. Implementation and training in new QMS procedures.

5

Technical documentation – pre-assessment
Pre-assessment of the updated technical documentation to ensure IVDR requirements are covered and allow for a faster review time by the notified body.

6

Internal audits and mock audit
Internal audit to ensure successful implementation of IVDR requirements and a mock-audit to prepare the company for the certification audit.

7

Conformity assessment (class A)
Sign DoC and product registration

Conformity assessment
Notified body audit and review of technical documentation.

8

For questions regarding our services around IVDR implementation, contact info@qadvis.com

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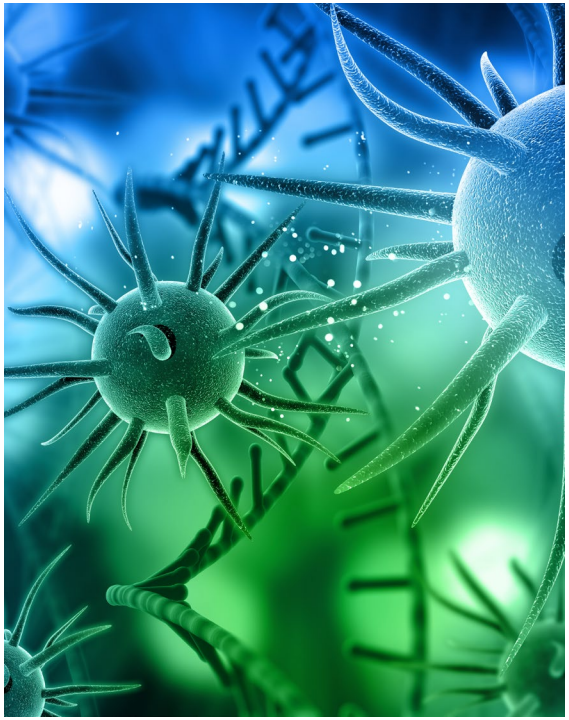
Use nomenclature and definitions according to the Regulations

- Intended purpose
- Technical Documentation
- PRRC
- Risk
- Distributor
- Clinical evidence
- Clinical benefit
- Performance evaluation
- Diagnostic specificity
- Adverse event
- Etc…..

General obligations of manufacturers



- Requirements on
- QMS
- Manufacturing and design
- Performance evaluation
- UDI system
- Risk management
- Technical documentation and DoC
- Vigilance
- Post market surveillance system

(IVDR Article 10)

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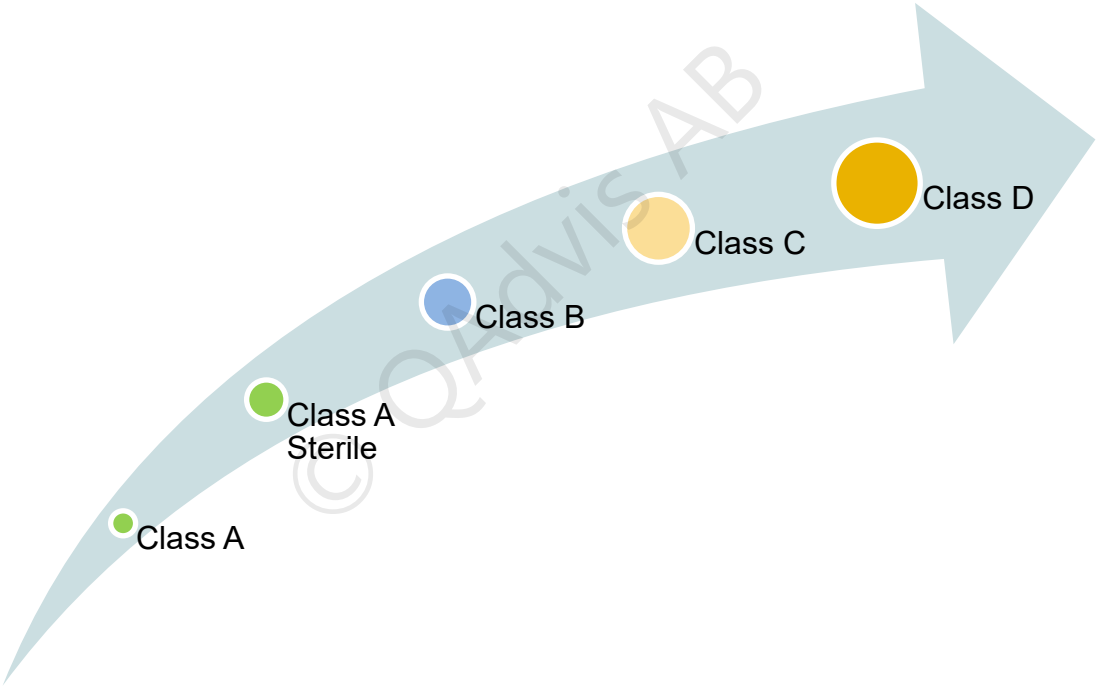
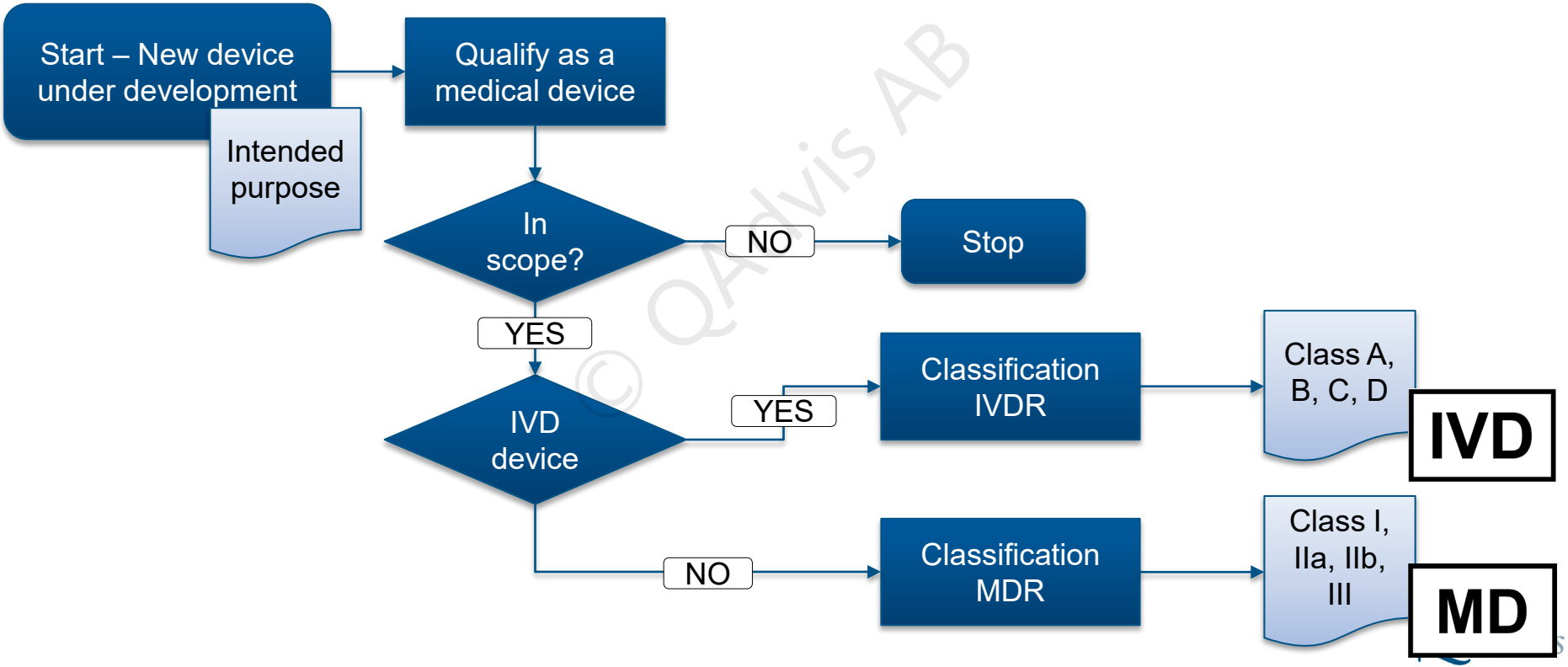
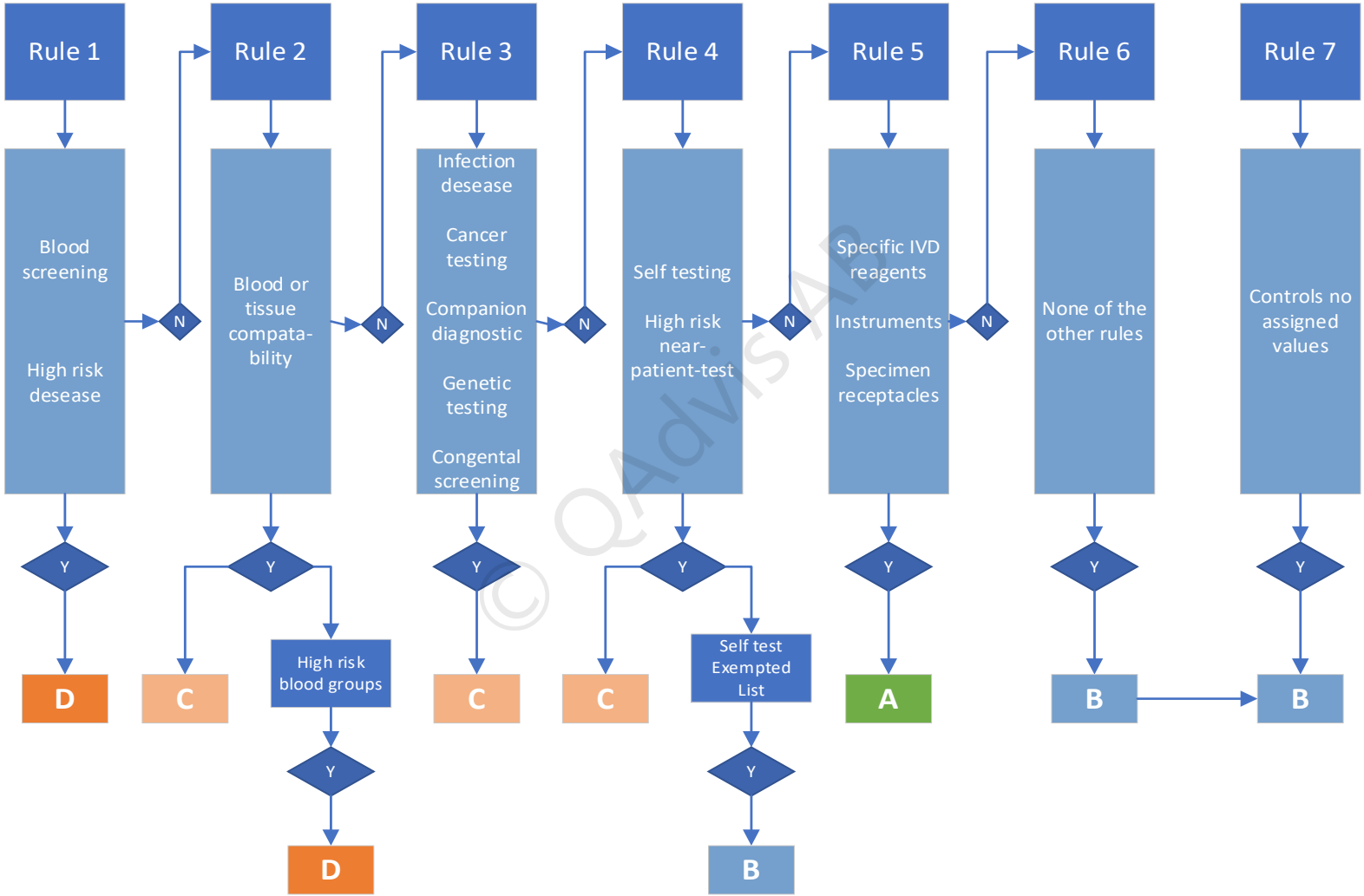
Conformity route – involvement of Notified Body



(IVDR Article 48)

Qualification and classification




Rule 1
Rule 2
Rule 3
Rule 4
Rule 5
Rule 6
Rule 7
Blood screening
High risk desease
Blood or tissue compata-bility
Infection desease
Cancer testing
Companion diagnostic
Genetic testing
Congental screening
Self testing
High risk near-patient-test
Specific IVD reagents
Instruments
Specimen receptacles
None of the other rules
Controls no assigned values
N
N
N
N
N
Y
Y
Y
Y
Y
Y
Y
D
C
High risk blood groups
C
C
Self test Exempted List
A
B
B
Y
D
B
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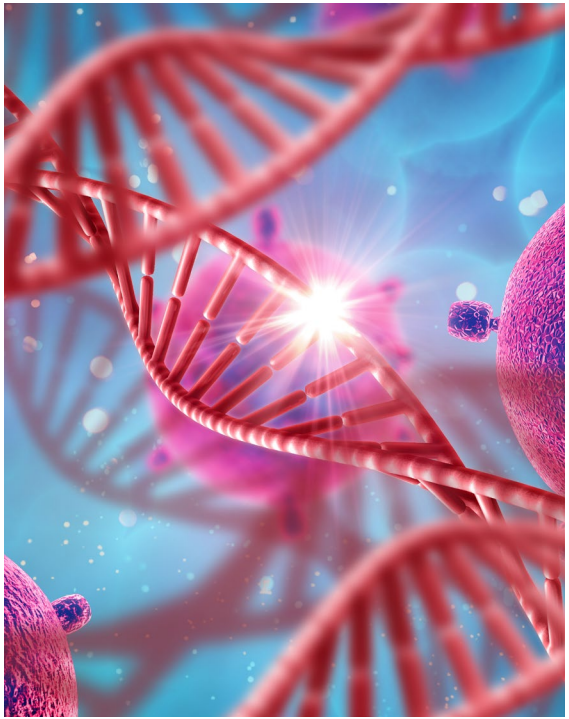
Post-market surveillance (PMS)



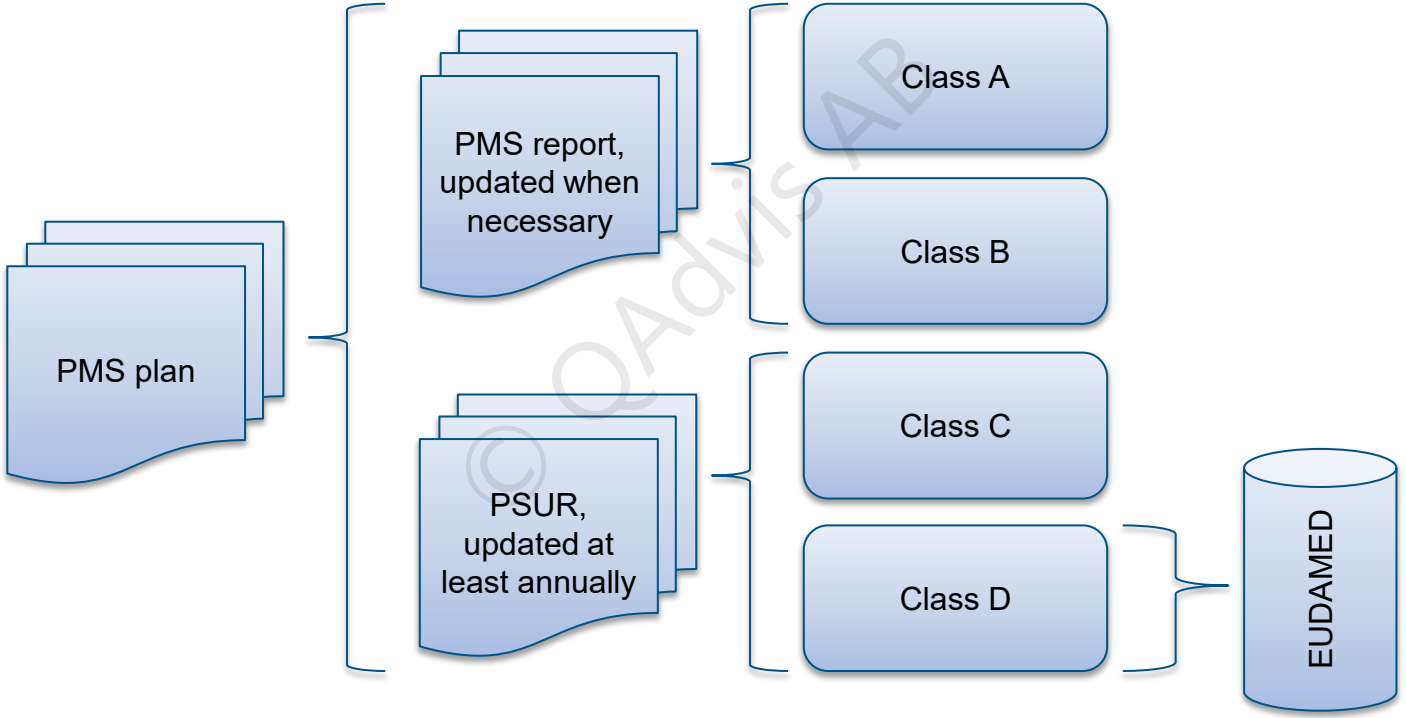
Plan shall show how you plan to

- update of the benefit-risk determination to improve the risk management
- update the design and manufacturing information, the instructions for use and the labelling;
- update the performance evaluation;
- update the summary of safety and performance;
- Identify the needs for preventive, corrective or field safety corrective action;
- identify the options to improve the usability, performance and safety of the device;
- when relevant, contribute to the post-market surveillance of other devices;
- detect and report trends in accordance with Article 83.

The results shall be reported in a Report – PMS or PSUR

(IVDR Article 78)

Post-market surveillance



(IVDR Article 78, 79, 80, 81)

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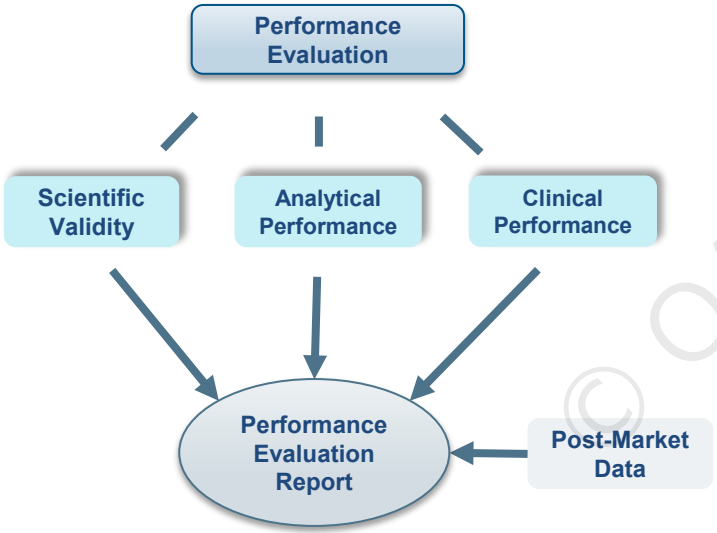
Performance evaluation - concept overview



- Intended purpose and intended use
- Assessment and analysis of data to establish or verify the scientific validity, the analytical, and, where applicable, the clinical performance of a device
- A continuous process
- Extent according to e.g. risks, device classification and intended use

(IVDR Annex XIII)

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Demonstration of scientific validity

The manufacturer shall demonstrate the scientific validity based on one or a combination of the following sources:

- relevant information on the scientific validity of devices measuring the same analyte or marker;
- scientific (peer-reviewed) literature;
- consensus expert opinions/positions from relevant professional associations;
- results from proof of concept studies;
- results from clinical performance studies.

(IVDR Annex XIII section 1.2.1)

Demonstration of the analytical performance

The manufacturer shall demonstrate the analytical performance in relation to all the parameters

- analytical sensitivity,
- analytical specificity,
- trueness (bias),
- precision (repeatability and reproducibility),
- accuracy (resulting from trueness and precision),
- limits of detection and quantitation,
- measuring range,
- linearity,
- cut-off, including determination of appropriate criteria for specimen collection and handling and control of known relevant endogenous and exogenous interference, cross-reactions

(IVDR Annex XIII)

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Demonstration of the clinical performance

Purpose is to show

- diagnostic sensitivity,
- diagnostic specificity,
- positive predictive value,
- negative predictive value,
- likelihood ratio,
- expected values in normal and affected populations.

Sources

- clinical performance studies;
- scientific peer-reviewed literature;
- published experience gained by routine diagnostic testing.

(IVDR Annex XIII)

Performance evaluation – Content according to IVDR

1. Performance evaluation plan
2. Demonstration of scientific validity
3. Demonstration of analytical performance
4. Demonstration of clinical performance
5. Performance evaluation report = documentation of the clinical evidence

(IVDR Annex XIII)

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“New” MDCG guidelines

- MDCG 2020-16 Guidance on Classification Rules for in vitro Diagnostic Medical Devices under Regulation (EU) 2017/746
- MDCG 2020-1 Guidance on clinical evaluation (MDR) / Performance evaluation (IVDR) of medical device software
- MDCG 2020-15 MDCG Position Paper on the use of the EUDAMED actor registration module and of the Single Registration Number (SRN) in the Member States

(https://ec.europa.eu/growth/sectors/medical-devices/new-regulations/guidance_en)

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Conclusions

- A lot of work – You have to speed up!
- Use nomenclature defined in IVDR
- Stricter requirements on all players (Authorities, Notified Bodies, Manufacturers and distributors)
- Sufficient clinical data is necessary
- Make sure you have a Notified Body who has time to review your doc in time
- Keep your eyes on Läkemedelsverkets and EU commission website