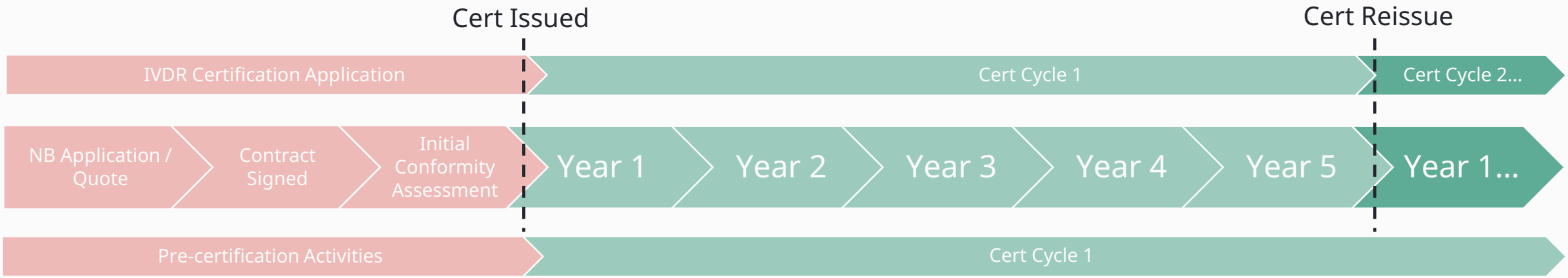
IVDR Post-Certification Activities

James Kerr
IVD Technical Specialist & Scheme Manager
Tuesday 21st May 2024

Session Scope



Lots of focus to date on this part of the process...

but what happens after the IVDR certificate(s) have been issued!?

Agenda

01
Requirements Overview

02
QMS Assessment

03
Tech Doc Surveillance

04
Change Notification

05
PMS / PMPF

06
Vigilance

Requirements

Overview of Post-certification activities and their IVDR requirements

Overview of IVDR Post-Certification Activities

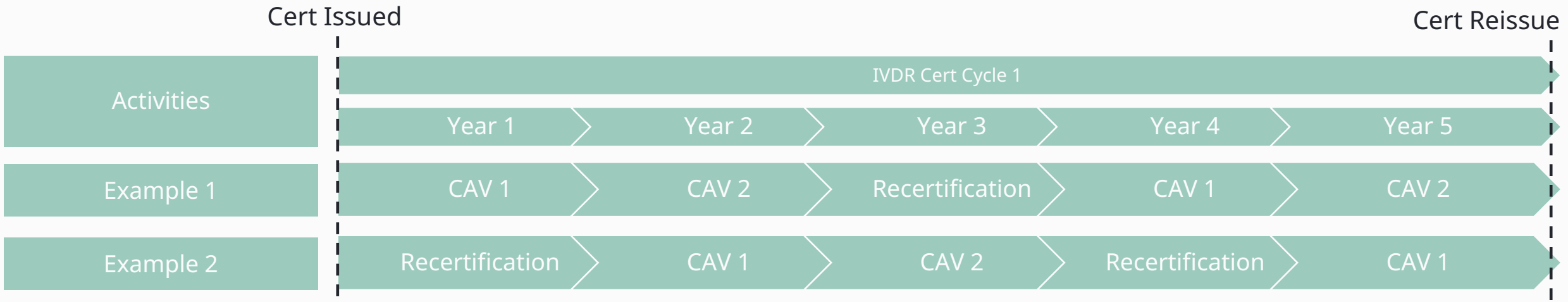
Manufacturer	Post-Market Surveillance (Ann. III)	Post-Market Performance Follow-up (Ann. XIII part B)	Changes (Ann. IX sec. 2.4)	Vigilance (Article 82)
Notified Body	QMS Assessment (Ann. IX Sec. 3.3) Tech Doc Surveillance (Ann. IX Sec 3.5) PSUR Review (Article 81)	Tech Doc Surveillance (e.g. Ann. IX Sec 3.5) PSUR Review (Article 81)	QMS Assessment (Ann. IX Sec. 3.3) Change Notification Process Tech Doc Review (If significant)	QMS Assessment (Ann. IX Sec. 3.3) Tech Doc Surveillance (Ann. IX Sec 3.5) Submitted Vigilance Reports

Overview of IVDR Post-Certification Activities

Manufacturer	Class B, C & D	Class C & D Only	Class D
Notified Body	Unannounced Audits (Annex IX Section 3.4)	SSP Validation PSUR Review (If requested) (Article 81)	Batch Release Testing (Annex IX section 4.12) Annual PSUR Review (Article 81)

QMS Assessment

Ongoing QMS Assessment Activities



- Many IVD manufacturers apply for IVDR with an ISO 13485 / MDSAP QMS already in place. As such, we won't go into a lot of detail here.
- These schemes operate on a three-year audit cycle with two interim (CAV) audits and a full recertification audit.
- IVDR/MDR in contrast may be up to a five-year audit cycle.
- If you hold ISO 13485 or MDSAP certification with BSI, your IVDR QMS audit schedule will be combined with your existing ISO 13485 / MDSAP audit schedule. See examples.
- To reissue an IVDR certificate, a positive recommendation for recertification must be made following the routine QMS assessments. There can be no open major non-conformities.

Unannounced Audits (UAV)

Unannounced audits are referenced in IVDR Annex IX section 3.4.

Annex IX Section 3.4

'The notified body **shall randomly perform at least once every five years** unannounced audits on the site of the manufacturer and, where appropriate, the site of the manufacturer's suppliers and/or subcontractors'.

Focus

Product driven audit

Focus on manufacturing traceability and final QC testing.

Get to manufacturing area ASAP

Witness testing

Duration and Scheduling

UAVs typically last a day onsite with two auditors.

Normally once per cert cycle, but with justification the NB may do more

Scheduled randomly in cycle

Prior to issuing the IVDR certificate you will be asked to provide information to facilitate planning of UAVs. Please try and keep this up to date if it changes.

Extension to Scope (ETS)

If during application or after the certificate is issued, you wish to make significant changes to the QMS, then additional QMS assessment may be required. For example,

Addition of higher class of device

If your initial IVDR QMS audit only covered class B devices and you wish to add class C and/or D devices, an ETS audit will be required.

This will involve a gap analysis of requirements not yet covered e.g. processes relating to SSP/PSUR or EURL.

Addition of Sterile Devices

If sterile devices are added to the device schedule, then additional audit time would be required to assess aspects of the QMS relating to sterility.

Change or addition of subcontractors

Additional audit time may be required to be performed at subcontractors, depending on their activities and certification status.

Tech Doc Surveillance

Requirements, guidance and procedural aspects of technical documentation surveillance reviews

Tech Doc Surveillance Review

IVDR Annex IX Section 3.5 – ‘In the case of class B and C devices, the surveillance assessment shall also include an assessment of the technical documentation…’.

NPT/Self-Test/CDx and Class D devices are not subject to TD surveillance.

Class B & C devices are sampled on a representative basis as per MDCG 2019-13:

Device Categories Vs. Generic Device Groups

Class B devices are grouped by ‘Device Category’ = IVR Code

e.g. Class B Device Category IVR 0608 (Physiological Markers)

Class C devices are grouped by ‘Generic Device Group’ = EMDN code + IVP code

e.g. Class C Generic Device Group W0102 (Immunochemistry) + IVP 3007 (Immunoassay) or

Class C Generic Device Group W010602 (acquired genomic alterations) + IVP 3004 (Chromosomal Analysis)

Tech Doc Sampling – A Summary

A brief overview of what the MDCG guidance document recommends…

Sample at least one device annually

Sample at least one device from each group per certification cycle

At least **5%** of devices should be reviewed **in the first cycle**, and at least **15%** of devices reviewed in subsequent cycles

Priority should be given to devices not yet reviewed

Tech Doc Surveillance reviews require the same depth and extent of review as Initial tech doc review, regardless of class.

When all devices have been reviewed, tech doc surveillance may focus mainly on PMS and changes.

This means that per certification cycle, manufacturers of class B and C devices will have at least 5 surveillance reviews…

Examples – One group with one device

Initial Review does not count towards 1st Cycle surveillance

Start of 1st Certificate Cycle

Must conduct Full Technical Documentation Review in the cycle to support 'group' at renewal

Device	Group	Initial Audit / Year 0	Year 1	Year 2	Year 3	Year 4	Year 5
D-Dimer Reagent	Class C GDG - W0103 + IVP 3007	Full TD + SSP Validation	PMS/Changes	PMS/Changes	PMS/Changes	Full TD Review	PMS/Changes

Device	Group		Year 6	Year 7	Year 8	Year 9	Year 10
D-Dimer Reagent	Class C GDG - W0103 + IVP 3007	N/A	PMS/Changes	PMS/Changes	Full TD Review	PMS/Changes	PMS/Changes

Start of 2nd Certificate Cycle

In 2nd Cycle must conduct full technical file audit for each Group. Not necessarily Yr6 spread out over 2nd cycle to balance resource.

Examples – Two groups with one device each

We do not have to sample each group each year.

Must conduct Full Technical Documentation Review in the cycle to support each 'group' at renewal

Device	EMDN	Initial Audit / Year 0	Year 1	Year 2	Year 3	Year 4	Year 5
D-Dimer Reagent	Class C GDG - W0103 + IVP 3007	Full TD + SSP Validation		PMS/Changes	Full TD		PMS/Changes
C. Difficile Kit	Class B Device Category IVR 0503	Full TD	PMS/Changes			Full TD	

Device	EMDN		Year 6	Year 7	Year 8	Year 9	Year 10
D-Dimer Reagent	Class C GDG - W0103 + IVP 3007	N/A	PMS/Changes		Full TD		PMS/Changes
C. Difficile Kit	Class B Device Category IVR 0503	N/A		PMS/Changes		Full TD	

Full TD to be conducted for each group in the cycle

Examples – One group with ten devices

Device	EMDN	Initial Audit / Year 0	Year 1	Year 2	Year 3	Year 4	Year 5
C. Difficile GDH Kit	Class B IVR 0503	N/A					
H. Pylori Kit	Class B IVR 0503	N/A	Full TD				
Rotavirus Kit	Class B IVR 0503	N/A					Full TD
Campylobacter Kit	Class B IVR 0503	N/A			Full TD		
Adenovirus Kit	Class B IVR 0503	N/A					
C. Difficile Toxins Kit	Class B IVR 0503	N/A				Full TD	
H. Pylori IgG Kit	Class B IVR 0503	N/A					
ASO Kit	Class B IVR 0503	N/A		Full TD			
Influenza A/B Kit	Class B IVR 0503	Full TD					
RSV Kit	Class B IVR 0503	N/A					

The NB justifies the order of sampling based on risk, IP, complexity, differences etc

All are full reviews as none have been reviewed before

Some devices don't get reviewed in the first cycle because the minimum requirements are covered.

This device isn't sampled this cycle as we prioritise devices not yet reviewed.

Examples – Seven groups

Device	EMDN	Initi Aud Year	Year 2	Year 3	Year 4	Year 5
C. Difficile GDH Kit	Class B IVR 0503	Full TD		Full TD		
Total T4 Kit	Class B IVR 0602	Full TD			Full TD	
Total IgG Kit	Class B IVR 0608	Full TD				Full TD
Isotype Control	Class B IVR 0702	Full TD	Full TD			
D-Dimer Kit	W0102+IVP 3007	N/A	Full TD & SSP			
CRP Kit	W0102+IVP 3007	Full TD & SSP				
HSV1&2 Kit	W0105+IVP 3011	Full TD & SSP				
cCMV Kit	W0105+IVP 3011	N/A		Full TD & SSP		
Glucose Kit	W0101+IVP 3002	Full TD & SSP				
Total Bilirubin Kit	W0101+IVP 3002	N/A	Full TD & SSP			

All groups were sampled at initial

All are full reviews as each group needs one full surv review to support renewal

Some years have more than one review to cover one review per group over the cycle

Prioritise devices not yet reviewed

Proportion of devices per cycle

Number of Devices in Group	5% (only applicable for the 1st Cycle)
1-19	1 File to be Sampled per Group
20-40	2 Files to be Sampled per Group
41-60	3 Files to be Sampled per Group
61-80	4 Files to be Sampled per Group
81-100	5 Files to be Sampled per Group

Number of Devices in Group	15% (subsequent cycles)
1-6	1 File to be Sampled per Group
7-13	2 File to be Sampled per Group
14-20	3 Files to be Sampled per Group
21-26	4 Files to be Sampled per Group
27-33	5 Files to be Sampled per Group
34-40	6 Files to be Sampled per Group
41-46	7 Files to be Sampled per Group

Tech Doc Surveillance – Procedural Aspects

Another file will be sampled…

If positive, scope reduction limited to first device.

If deficiencies found, scope reduction to the entire group.

Planning

- BSI aim to request the first file for surveillance within six months of certificate issue
- Files requested annually thereafter
- Final year's may be brought forward

File Submission

- BSI will notify you which file has been sampled and you'll be given a short time to respond – currently 10 working days.

Duration

- Process the same as initial
- Three rounds of questions
- Clarifications calls are offered
- Respond to questions within 15 working days

Outcomes

- Positive recommendation for continued certification is made
- Positive recommendation cannot be made

Tech Doc Surveillance So far…

Surveillance reviews so far have generally been quicker, with fewer and less complex questions than initials.

As BSI issue more certificates, the surveillance burden increases, and resource is required to remain compliant.

The IVD team is continuing to grow to support this

Changes

How to report IVDR changes to BSI and what the impact might be.

Changes under IVDR

There is currently no guidance on what is considered substantial – if in doubt, report it to your NB!

Changes are documented in IVDR Annex IX section 2.4, 4.11, 5.1f) and 5.2f).

Manufacturers must tell NBs about substantial changes to the QMS, device-range or devices covered by technical documentation assessment certificates.

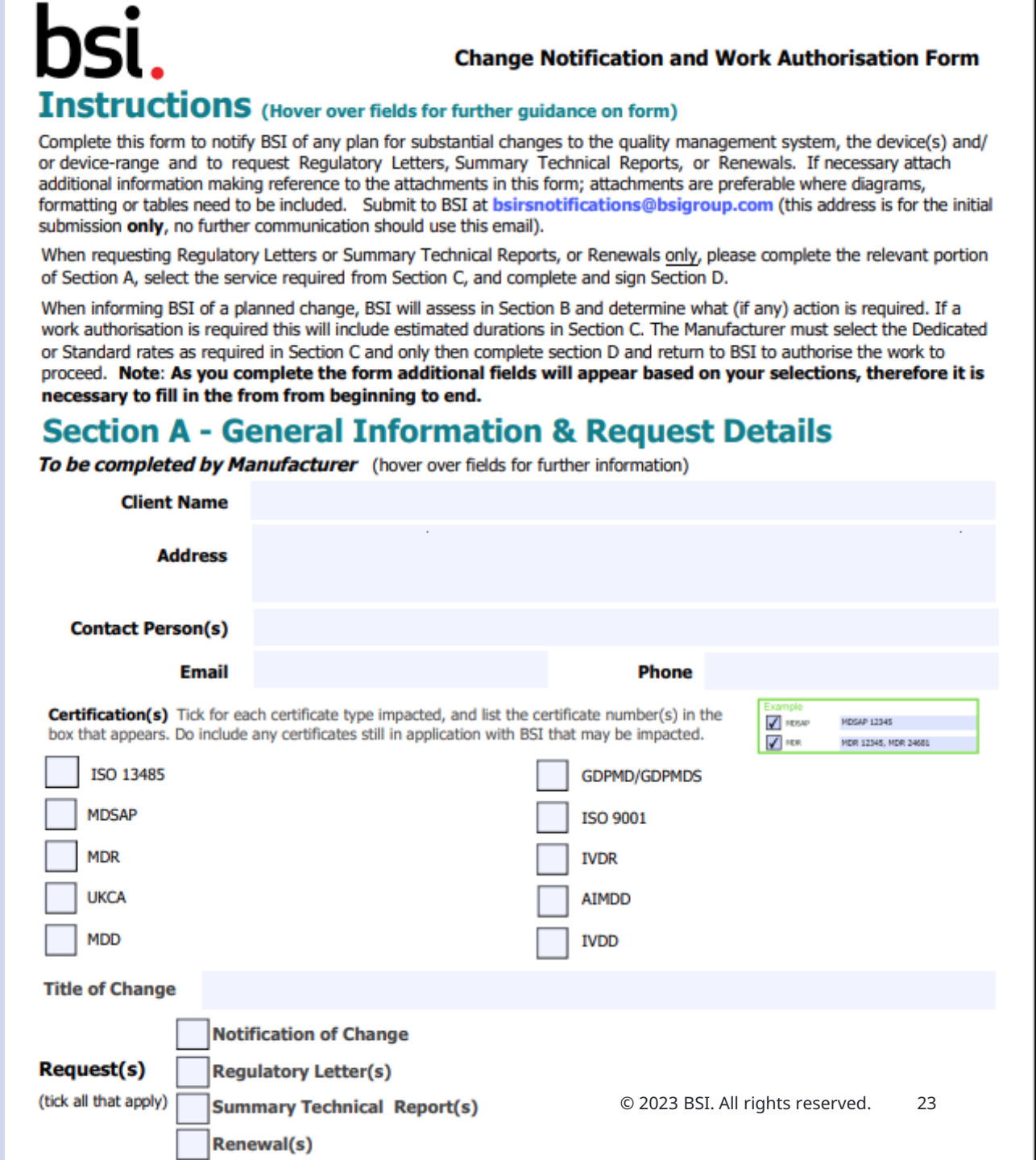
NBs must review the changes and determine whether the changes are substantial.
If they are, they will communicate what audits are required to verify the changes comply with IVDR

If an audit of substantial changes is required, the NB will issue a supplement to the certificate to document their approval.

Change notification form – MDF 4900

Changes can be reported to BSI via the change notification form. This should be sent to: BSIRSNotifications@bsigroup.com

- Scheme Manager or competent Technical Specialist will review
- You will be notified of the outcome.
- If necessary, a new quote will be provided.



bsi.

Change Notification and Work Authorisation Form

Instructions (Hover over fields for further guidance on form)

Complete this form to notify BSI of any plan for substantial changes to the quality management system, the device(s) and/or device-range and to request Regulatory Letters, Summary Technical Reports, or Renewals. If necessary attach additional information making reference to the attachments in this form; attachments are preferable where diagrams, formatting or tables need to be included. Submit to BSI at bsirsnotifications@bsigroup.com (this address is for the initial submission **only**, no further communication should use this email).

When requesting Regulatory Letters or Summary Technical Reports, or Renewals only, please complete the relevant portion of Section A, select the service required from Section C, and complete and sign Section D.

When informing BSI of a planned change, BSI will assess in Section B and determine what (if any) action is required. If a work authorisation is required this will include estimated durations in Section C. The Manufacturer must select the Dedicated or Standard rates as required in Section C and only then complete section D and return to BSI to authorise the work to proceed. **Note: As you complete the form additional fields will appear based on your selections, therefore it is necessary to fill in the from from beginning to end.**

Section A - General Information & Request Details

To be completed by Manufacturer (hover over fields for further information)

Client Name

Address

Contact Person(s)

Email **Phone**

Certification(s) Tick for each certificate type impacted, and list the certificate number(s) in the box that appears. Do include any certificates still in application with BSI that may be impacted.

Example
MDSAP MDSAP 12345
MDR MDR 12345, MDR 24681

- ☐ ISO 13485
- ☐ MDSAP
- ☐ MDR
- ☐ UKCA
- ☐ MDD
- ☐ GDPMD/GDPMDS
- ☐ ISO 9001
- ☐ IVDR
- ☐ AIMDD
- ☐ IVDD

Title of Change

Request(s) (tick all that apply)

- ☐ **Notification of Change**
- ☐ **Regulatory Letter(s)**
- ☐ **Summary Technical Report(s)**
- ☐ **Renewal(s)**

PMS & PMPF

Post-Market Surveillance

Post-Market Surveillance Requirements are detailed in Article 78-81 and Annex III.

Article 80 applies to Class A & B (PMSR), Article 81 applies to class C & D (PSUR).

Proportionate

For each device manufacturers shall plan, establish, document, implement, maintain and update a post-market surveillance system **in a manner that is proportionate** to the risk class and appropriate for the type of device.

Expectations

- Only the PMS plan will have been reviewed at initial review.
- The notified body will be focussing on PMS outputs:
    - Have there been any updates to the plan?
    - Have the activities been performed according to the plan?
    - Are any findings being handled appropriately?
    - Is the TD being updated appropriately – Risk, SSP, PE, PER, etc

PSURs

Article 81

- Manufacturers of class C and D devices shall prepare a PSUR
- They shall be updated at least annually
- Class D manufacturers must submit these annually to the notified body (directly in absence of EUDAMED).
- Use the cert issue date as the anniversary for submission
- Notified bodies may also request routine review of class C PSURs with justification.

Currently there is no IVDR specific guidance, but there is an MDR PSUR guidance document (MDCG 2022-21). Assume that subsequent IVDR guidance will be broadly similar:

PMPF

Annex XIII Part B

Post-Market Performance Follow-Up is the **continuous process** that proactively monitors the safety and performance of the device and is specifically addressed in the manufacturer's **PMPF plan**

PMPF is the proactive collection and evaluation of the **performance and relevant scientific data** from the use of a device which bears the CE marking **within its intended purpose**

Builds a bridge between the clinical evidence collected **pre-market** and the performance when the device is in **regular use**

Addresses **residual risks** and/or **uncertainty** about long-term clinical performance that may impact the benefit-risk ratio

Quantifies the benefits & risks of the user experience in a **real clinical setting**

PMPF Surveillance

As with surveillance review of PMS, the Notified Body will be focussing on PMPF outputs, the plan will have been reviewed as part of initial conformity assessment.

Consistent

- Did you do what you said you would?
- If there have been changes to the plan, Justify this

Impact

- How have the PMPF findings impacted the rest of the technical documentation

Proportionate

- A complex, novel, high-risk device may require more than a well-established lower-risk device with long market history

Justification

- If not doing PMPF - Strong justification, updated regularly.
- Use PMPF to your advantage for novel or rare devices.

Remember the PER and PSUR for class C & D devices must be updated annually – both require PMPF outputs to be included

Vigilance

Vigilance Requirements – Article 82-84

Article 82

1. Manufacturers…shall report, to the relevant competent authorities…the following:

a) any serious incident…

b) any field safety corrective action…

Article 83

1. Manufacturers shall report… any statistically significant increase in the frequency or severity of incidents that are not serious incidents that could have a significant impact on the benefit-risk analysis…

Annex VII section 4.3

"…An obligation on the manufacturer to inform the notified body of vigilance reports…'

Vigilance Timelines

Article 82 mandates timelines for reporting of Vigilance:

Serious Public Health Threat

Immediately upon awareness, but no more than 2 days.

Death or serious deterioration in state of health

Immediately on establishing a causal relationship, no more than 10 days

Serious Incident

Immediately on establishing a causal relationship, no more than 15 days

In Summary...

Resource

- Significant ongoing resource requirements from manufacturers and NBs to maintain compliance with IVDR post-certification.
- Remember ‘proportionate’

Engage

Engage with your NB!

It benefits both sides to have open communication.

PMPF

Make use of PMPF as a useful scaffold to ensure the continued safety and performance of your device(s)

Especially if the device is novel or rare!

Reporting

Remember obligations for reporting:

- changes

- PSURs for class Ds

- Vigilance

Questions

James Kerr – Technical Specialist & Scheme Manager, IVD

Dr Elizabeth Harrison – Global Head - IVD Medical Devices