

CDRH Medical Device Development Tools (MDDT) Program

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Qualification through MDDT Pathway



Using MDDTs to support marketing applications

Why the MDDT Program?



MDDT Program qualifies tools to advance medical device development

Voluntary

Reduces regulatory burden in evaluating medical devices

Facilitates development and timely evaluation of medical devices

Supports regulatory submissions and decision-making

Tool submitters may be a person, group, consortium, or organization (including the federal government)





Medical Device Manufacturers	 Reduce individual resource expenditure Minimize uncertainty in review process 	FDA
Regulators (FDA/CDRH)	 Efficiency in CDRH Review Acceptance of Tool in Regulatory Review 	MDDT Qualification plays many
Regulatory Scientists & Tool Developers	 Bridge gap between research and development Further innovation & Collaboration 	roles in the medical device
Patients	• Enable Patient Voices to be incorporated [PROs]	ecosystem



Method, material, or measurement

to assess safety, effectiveness, or performance of a medical device



Scientifically substantiated

May be qualified for use in device evaluation and support regulatory decision-making

What is an MDDT?



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Examples of Common MDDTs

Non-clinical Assessment Models

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A non-clinical test model or method that measures or predicts device function or in vivo device performance.

• e.g., computational models, animal models, phantoms.

Clinical Outcome Assessment

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Assessment of a clinical outcome reported by a clinician, a patient, a non-clinician observer or through a performance-based assessment. May include digital health technologies.

Biomarker Test

A defined characteristic that is measured as an indicator of normal biological processes, pathogenic processes, or biological responses to an exposure or intervention, including therapeutic interventions.

 e.g., measures of molecular, histologic, radiographic, or physiologic characteristics.

Other

Tools that do not fit directly into any particular category, however can be used to support regulatory decision making *e.g., databases.*

Qualification Process

Proposal Phase (~90 Days)

- 1. Determine suitability of MDDT based on ability to facilitate regulatory decision making.
- 2.Review Qualification Plan with performance criteria and plan for collecting and gathering evidence in support of proposed and context of use.

Qualification Phase

- 1. Evaluate strength of evidence in Qualification Package to determine whether evidence meets the performance criteria and supports the Qualification Plan for proposed context of use.
- 2.Qualify tool if the evidence supports the proposed context of use.

FDA only intends to qualify tools where FDA can make public certain highlevel information about the existence of qualified tools and their utility



Key Content to Include in Proposal Phase



MDDT Description	Concept of Interest/Description of principle
	Method and mode of measurement
Context of Use Statement	Use within regulatory submission Specific output(s), measure(s), endpoints, timing of assessments, etc.
Performance Criteria	Performance characteristics of measurement outputs Measurement properties (reliability, meaningful change, etc.) Scientific justification for strength of evidence collected to support qualification
Qualification Plan	Methods and Performance data to be collected Design verification and validation/validity evidence to be collected Relationship between measurement outputs/validity evidence to context of use
Assessment of Advantages and Limitations	Advantages should highlight impact of tool use on regulatory decision making Limitations should highlight conditions under which tool cannot provide a meaningful assessment

Key Content to Include in Qualification Phase



Proposal	Contents of Proposal including:	
	Tool description	
	 Context of use statement 	
	Performance criteria	
	Qualification plan	
Tool Evidence	Evidence	
	Clinical Outcome Assessment (COA) Dossier	
Assessment of Advantages and	Advantages should highlight impact of tool use on regulatory decision making	
Limitations	Limitations should highlight conditions under which tool cannot provide a meaningful assessment	



Summary of Evidence and Basis of Qualification (SEBQ)

- SEBQ includes:
 - Brief description of tool and principle of operation
 - Qualified context of use
 - Summary of evidence to support qualification
 - Assessment of advantages and limitations
 - Contact information for tool developer
- SEBQ does not include proprietary information



MDDT Proposal Submission Process



- Any tool developer, medical device sponsor, or others, such as research organizations and academia can voluntarily submit a proposal
- No Fees
- MDDT Proposal Submission Content
 - <u>www.fda.gov/medical-devices/medical-device-</u> <u>development-tools-mddt/medical-device-development-</u> <u>tool-mddt-proposal-submission-content</u>
- Submission Methods:
 - Electronically through the CDRH Customer Collaboration
 Portal
 - <u>www.fda.gov/medical-devices/industry-medical-</u> <u>devices/send-and-track-medical-device-premarket-</u> <u>submissions-online-cdrh-portal</u>
 - Mail to the CDRH Document Control Center
 - www.fda.gov/medical-devices/how-study-andmarket-your-device/ecopy-medical-devicesubmissions
- Email questions to MDDT@fda.hhs.gov



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17 Qualified **MDDTs** 1000+ Premarket **Submissions Cited Breakthrough** 510(K) Use of a Qualified Designation MDDT Q-sub De Novo **PMA**

Qualified MDDTs are routinely cited by Sponsors FDA

17 Currently Qualified MDDTs



COA (7)

- <u>Assessment of IntraOcular Lens Implant Symptoms</u> (<u>AIOLIS</u>) instrument (5/16/22)
- FACE-Q Aesthetics (4/26/22)
- Patient-Reported Outcomes with LASIK Symptoms and Satisfaction (PROWL-SS) (6/17/21)
- BREAST-Q Reconstruction Module (8/20/20)
- Insulin Dosing Systems: Perceptions, Ideas, Reflections, and Expectations (INSPIRE) Questionnaires(6/24/20)
- <u>Minnesota Living with Heart Failure Questionnaire</u> (MLHFQ)(3/19/18)
- Kansas City Cardiomyopathy Questionnaire (KCCQ)(10/19/17)

BIO (2)

- <u>Apple Atrial Fibrillation History Feature</u> (5/1/24)
- OSIRIX CDE Software Module (3/12/19)

NAM (7)

- <u>Accelerated Testing to Prove Long-Term Material Biostability</u> (8/9/23)
- <u>Computational Tool Comprising Visible Human Project Based</u> <u>Anatomical Female CAD Model and Ansys HFSS/Mechanical</u> <u>FEM Software for Temperature Rise Prediction near an</u> <u>Orthopedic Femoral Nail Implant during a 1.5 T MRI Scan</u> (3/30/23)
- <u>CHemical RISk Calculator (CHRIS) Color Additives</u> (11/28/23)
- Virtual MRI Safety Evaluations of Medical Devices (11/16/21)
- •IMAnalytics with MRIxViP1.5T/3.0T And BCLib (5/20/21)
- <u>Rubric for Applying CVSS to Medical Devices</u> (10/20/20)
- <u>Tissue Mimicking Material (TMM) for Preclinical Acoustic</u> <u>Performance Characterization of High Intensity Therapeutic</u> <u>Ultrasound (HITU) Devices</u> (7/10/29)

Other (1)

• <u>The University of California San Francisco (UCSF) Lethal</u> <u>Arrhythmia Database (LAD)</u> (3/28/24)

Summary





MDDT PROGRAM IS A VOLUNTARY PATHWAY TO QUALIFY REGULATORY SCIENCE TOOLS

MDDTS ARE TOOLS THAT ASSESS SAFETY, EFFECTIVENESS OR PERFORMANCE OF A MEDICAL DEVICE. DEVICE MANUFACTURERS ARE ENCOURAGED TO USE IN SUPPORT OF THEIR PREMARKET APPLICATION.





Resources

MDDT Program & Qualified tools

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MDDT Webpage

MDDT Guidance



Questions or Concerns: MDDT@fda.hhs.gov

