



JEMMDx

EXPERTS IN
Patient-centric
Diagnostics
& FemTech

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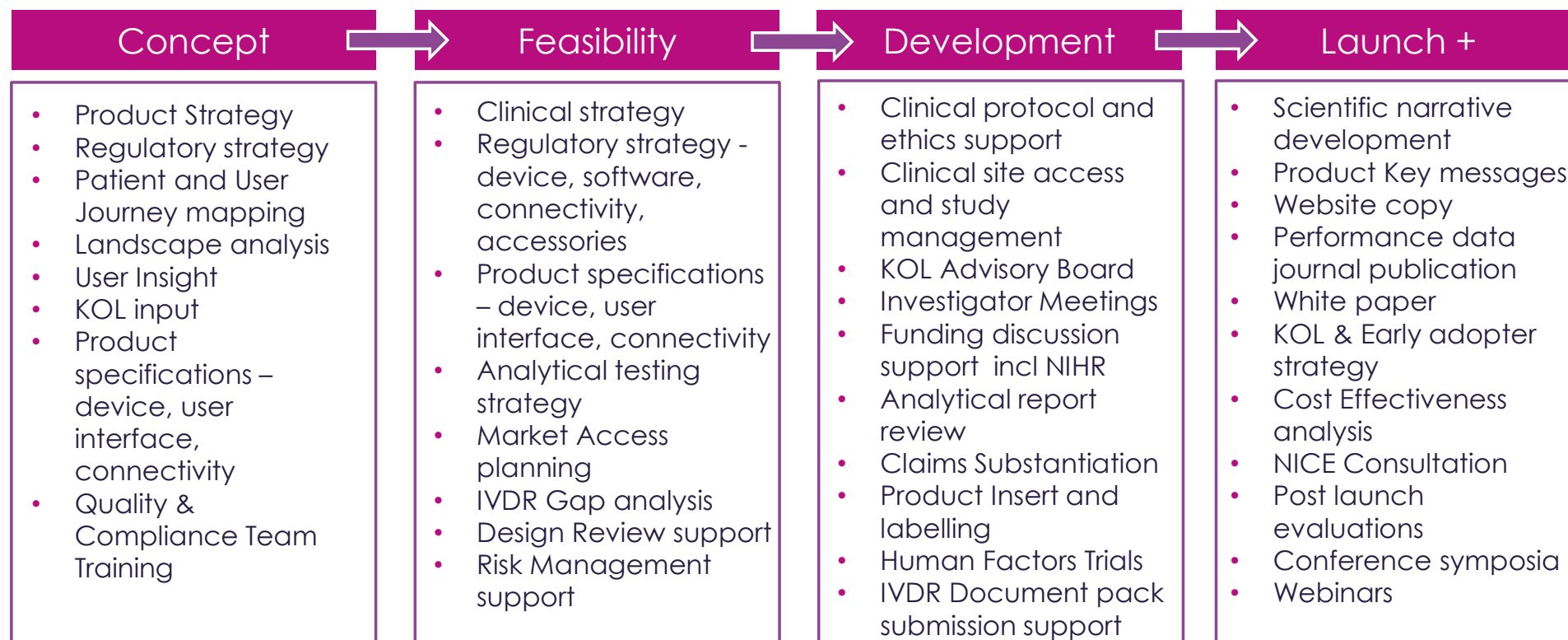
We are a consultancy service uniquely focused on patient-centric diagnostics and devices: Point of care tests, Consumer Diagnostics, medical devices and FemTech.

- In-depth knowledge and expertise in:
 - Product Strategy and Messaging/ claims substantiation
 - Clinical and Regulatory pathway development and clinical trial support
 - IVDR Pathway
 - Gap analysis and remediation
 - Regulatory submissions (UKCA, EU IVDR, FDA, WHO, PMDA etc)
 - Studies/RWE: Regulatory, Post Launch, RWE and Usability, PMS reporting (PMPF)
 - Stakeholder engagement/ advocacy – KOLs, NGOs, DHSC etc
 - Medical communications- journal papers, White papers, conference symposia



We offer an industry-experienced, pragmatic and hands on approach to deliver what is required for you.

Bespoke capabilities across the product lifecycle



25+years of Product Development & Launch Experience

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Start with the End in Mind!

What

- ▶ Who are you design for?
- ▶ Compliance by design needs to consider the users and stakeholders.
- ▶ What do you need to comply with?
- ▶ BUSINESS by Design

Top tips and lessons learned....

How

- ▶ Understand your user and user needs, understand the environment of use, and what governance required.
- ▶ Understand the system- Many people don't know what the system is. Design Silos in big companies-
- ▶ How to incorporate the regulatory requirements which includes human factors and standards
- ▶ What are the trade-offs and how to manage them
- ▶ How to manage the Design lifecycle and include quality requirements-QMS and D&D
- ▶ How to verify and validate user needs are met...clinical data
- ▶ Interdisciplinary Thinking and Collaboration. **The “Im alright Jack” attitude. Be a TEAM.**

Considerations for Design process



understand your user and user needs, understand the environment of use, Designing Lay users/ professional Women or children?? Older people
WHO are the TEAM?
Conscious and Unconscious BIAS

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intended use, indicated users Understand the full lifecycle and Product and use
RISKS
Useability Engineering
Human Factors iterative studies, learn from this!
What is the Full System-are you clear on that.



What is the USP, what is the action the user takes
How do you demonstrate its worth it.
What testing and data do you need?
TEST the design envelopes- test to failure before starting
Verification and validation



What is the cost model and **economic model for the product.**
How do you convince payors.
Adoption studies



Don't assume that you know how your product is best used or will fit into healthcare environment.
Build it and they will come can be flawed.
User groups, patient advocates
Ethnography



Don't forget connectivity – how will the data get into APPS or EHR?
Is the APP considered in system RISK
Can all users use APPS

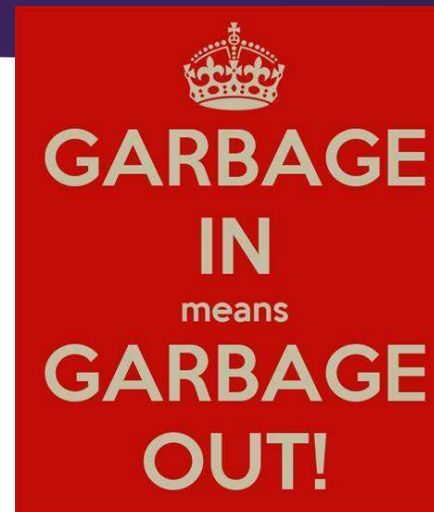
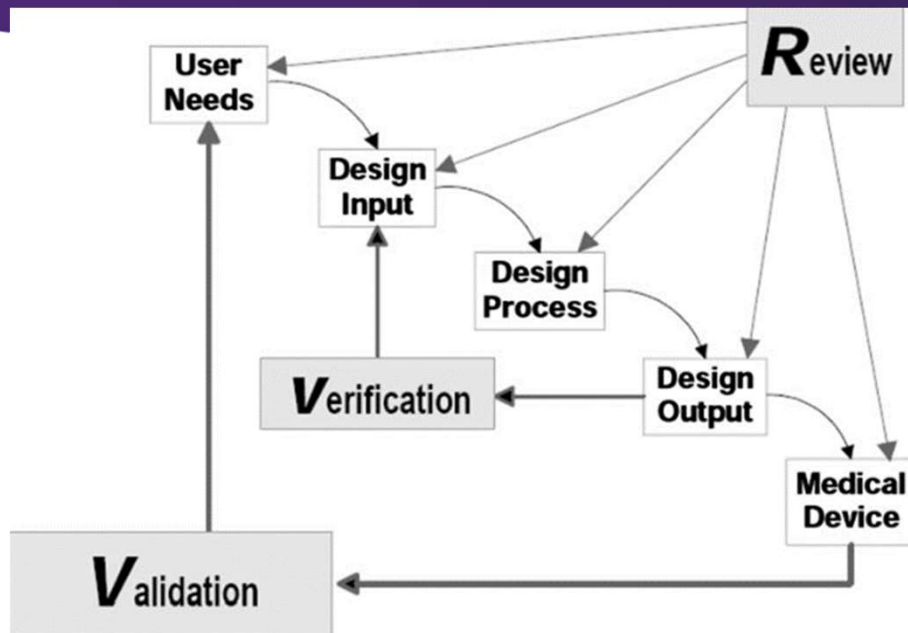


Do you know **how your users will be trained.**
IFU eIFU
User interface
How do you fool proof? **What are the risks of getting it wrong?**



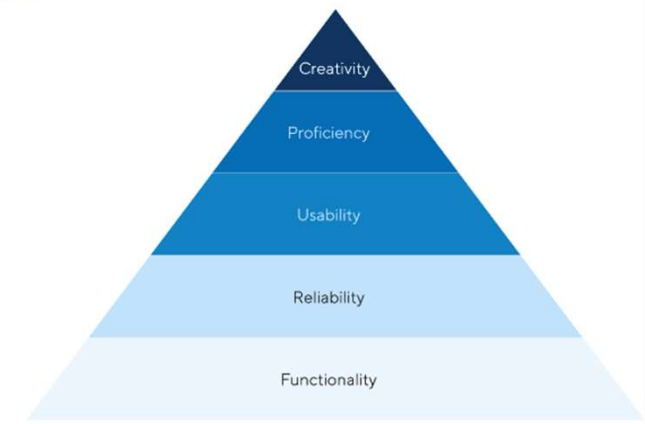
Other considerations for product.
Packaging and Labelling
Transportation
Accessories and consumables
Disposal, complaints and recalls.
Search databases for competitor issues

Design Hierarchy- Mitigating Risk



Right people involved!

Design Hierarchy of Needs



Add regulatory compliance to hierarchy

- ▶ Use Design Control Process- it ADDS value and can help get it right first time!
- ▶ Do the TEAM really understand ALL the inputs and user needs

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The Ronseal Phrase

People use the phrase every day, it has come to represent a product or policy that is open and honest; it is used when something quite simply 'Does Exactly What it Says on the Tin.'

Get the right data to support the claims

- ▶ **The restriction of the use of certain hazardous substances in electrical and electronic equipment (Directive 2011/65/EU)**
 - ▶ — Appliances burning gaseous fuels (Regulation (EU) 2016/426)
 - ▶ — Ecodesign requirements for energy-related products (Directive 2009/125/EC and all implementing Regulations for specific product groups that have been adopted under this Framework Directive)
 - ▶ — Simple pressure vessels (Directive 2014/29/EU)
 - ▶ — Toys' safety (Directive 2009/48/EC)
- ▶ **— Electrical equipment designed for use within certain voltage limits (Directive 2014/35/EU)**
- ▶ **— Machinery (Directive 2006/42/EC)**
- ▶ **— Electromagnetic compatibility (Directive 2014/30/EU)**
- ▶ **— Measuring instruments (Directive 2014/32/EU)**
 - ▶ — Non-automatic weighing instruments (Directive 2014/31/EU)
 - ▶ — Cableway installations (Regulation (EU) 2016/424)
- ▶ **— Radio equipment (Directive 2014/53/EU)**
- ▶ **— Medical devices (Regulation (EU) 2017/745, replacing Directives 90/385/EEC and 93/42/EEC as of 26 May 2021)**
- ▶ **— In vitro diagnostic medical devices (Directive 98/79/EC replaced by Regulation (EU) 2017/746 as of 26 May 2022)**
 - ▶ — Pressure equipment (Directive 2014/68/EU)
 - ▶ — Transportable Pressure equipment (Directive 2010/35/EU)
 - ▶ — Aerosol Dispensers (Directive 75/324/EEC as amended)
 - ▶ — Lifts (Directive 2014/33/EU)
 - ▶ — Recreational craft (Directive 2013/53/EU)
 - ▶ — Equipment and protective systems intended for use in potentially explosive atmospheres (Directive 2014/34/EU)
 - ▶ — Explosives for civil uses (Directive 2014/28/EU)
 - ▶ — Pyrotechnics (Directive 2013/29/EU)
 - ▶ — Regulation on the Labelling of Tyres (Regulation (EU) No 2020/740)
 - ▶ — Personal protective equipment (Regulation (EU) 2016/425)
 - ▶ — Marine equipment (Directive 2014/90/EU)
 - ▶ — Noise emission in the environment by equipment for use outdoors (Directive 2000/14/EC)
 - ▶ — Emissions from non-road mobile machinery (Regulation (EU) 2016/1628)
 - ▶ — Energy labelling (Regulation (EU) 2017/1369 and all delegated Regulations for specific product groups that have been adopted under this Framework Regulation and those adopted under Directive 2010/30/EU, the predecessor of Regulation 2017/1369)
 - ▶ — Fertilising Products (Regulation (EU) 2019/1009)
 - ▶ — Unmanned aircraft systems (drones) (Commission Delegated Regulation (EU) 2019/945)

GENERAL Presumption of Conformity !

Each directive/regulation publishes the list of harmonised standards

EU framework

- ▶ [Harmonised Standards - European Commission \(europa.eu\)](https://european-commission.europa.eu)
- ▶ Designers should know their standards for their SYSTEM based on the **product classification and understand competing requirements across the system**
- ▶ **General standards/Horizontal standards ISO 13485, ISO 14971 ISO 62366 and product specific standards for the following:**
 - ▶ Hardware
 - ▶ Software/Firmware/Connectivity/Communications protocols
 - ▶ Biological/Chemical
 - ▶ Labelling and Packaging/symbols IFU
 - ▶ Clinical
 - ▶ Performance- very product specific
 - ▶ Sterilisation
 - ▶ Transport
 - ▶ Environmental/ Carbon Reduction
- ▶ **How to set acceptance criteria....Unless there is a CTS giving prescriptive requirements or other recognised consensus standards it is typically based on risk analysis and intended use that allows setting of the correct acceptance criteria and functional design Input**

For your product type:

which harmonised or non-harmonised standards?

UK/EU/USA/other global markets differ....

Include in your design inputs

Standards are our friend- sources

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- ▶ Directives
- ▶ Regulation
- ▶ Common Technical Specifications
- ▶ Guidance MEDDEV IMDRF etc. Specific design considerations for HOME use FDA and others
- ▶ Standards, International, National, Local and Product Specific
- ▶ Target Product Profiles
- ▶ Protocols- ISTA, CLSI
- ▶ Great design inputs- borrow ideas from other standards even if your product is not in scope and there is value
- ▶ **Don't be overwhelmed. JEMMDx support our clients to define their framework and support through the lifecycle**

Recognized Consensus Standards: Medical Devices

◉ FDA Home ◉ Medical Devices ◉ Databases

This database provides the most up-to-date list of voluntary consensus standards to which FDA will accept a Declaration of Conformity for medical devices. After FDA has decided to recognize a standard, we will update our online database to reflect the decision even before formal recognition of the standard occurs by publication in the Federal Register. Publications in the Federal Register to the lists of recognized consensus standards can be accessed at <https://www.fda.gov/medical-devices/standards-and-conformity-assessment-program/federal-register-documents>.

The following guidance document is applicable to all recognized standards:

- [Appropriate Use of Voluntary Consensus Standards in Premarket Submissions for Medical Devices - Guidance for Industry and Food and Drug Administration Staff, issued September 2018.](#)



Design Considerations for Devices Intended for Home Use

Guidance for Industry and Food and Drug Administration Staff

Guidance MEDDEVs

The MEDDEVs promote a common approach to be followed by manufacturers and notified bodies that are involved in conformity assessment procedures.

- The MEDDEVs are drafted by authorities charged with safeguarding public health in conjunction with all stakeholders (industry associations, health professionals associations, notified bodies and European standardisation organisations). This is in accordance with the relevant annexes of the directives.
- MEDDEVs are carefully drafted through a consultation process with all interested parties and are subject to a regular updating process.
- These documents have particular reference codes and are endorsed at the medical devices expert group (MDEG) plenary meetings.
- The guidelines are not legally binding. However, due to the participation of the aforementioned interested parties and the experts from competent authorities, it is expected that the guidelines be followed, ensuring the uniform application of relevant directive provisions.



International Organization for Standardization

- The International Organization for Standardization known as ISO, is an international standard-setting body composed of representatives from various national standards organizations.



National Organization for Standardization

ANSI (American National Standards Institute, [www.ansi.org](http://www ansi.org)).

AENOR (Association Francaise de Normalisation).

BSI (British Standards Institute).

DIN (Deutsches Institute fur Normung e.v).

JISC (Japanese Industrial Standards Committee).



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Lessons learned over the years

- ▶ Look at competitor products and what works- and what doesn't work
- ▶ Look at other designs and think about similarities to yours "competitive intelligence"
- ▶ Marketing claims that cant be substantiated-Ronseal?!
- ▶ Designing for ageing populations, does one size fit all?
- ▶ Design hierarchy needs to include regulatory, costs **and good business sense!**

Summary JEMMDx support all areas

What

- ▶ Design Inputs defined the WHAT and the WHO- share the responsibility and build a great TEAM
- ▶ All stakeholders into the product have been considered, remove your BIAS
- ▶ Inputs include clear regulatory and risk reduction, test to failure or know the **design envelopes for the product**

How

- ▶ Use cross functional/Interdisciplinary teams who can live and breathe the product
- ▶ Use the regulatory requirements which includes human factors and standards
- ▶ Use the design control process with the appropriate phase gates, **design reviews**
- ▶ verify specifications and validate user needs are met...get the right data to demonstrate this
- ▶ **Interdisciplinary Thinking in the TEAM**
- ▶ **Collaborate**