



**IMDRF**

International Medical  
Device Regulators Forum

# **Regulated Product Submission Update**

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## RPS History

- In Kyoto, the IMDRF MC endorsed the recommendation that WG continue efforts to work towards implementation of RPS as the future electronic information exchange format to be used for medical device submissions; and that the MC charter additional efforts within the RPS WG to develop a harmonized, device specific implementation of the RPS standard



## RPS History

- Should be noted that implementation of RPS is a long term undertaking and efforts will most likely take several years
- WG recommends that gradual steps be taken to implement the HL7 RPS Message Standard (e.g. use of a harmonized folder structure as a transition format, etc.)



# RPS Implementation Work

## RPS STANDARD

Defines all possible data and relationships



## Implementation Guide

Technical Requirements - specifies which parts of the standard will be used and how.

## Software tools

Built based on the implementation guide. Presents a customized user view to the submission information

## IMDRF Harmonized Implementation Guide (IG)

The harmonized IG is the basis for the regional IGs.



US IG



Brazil IG



EU IG



Canada IG



## Challenges in Quantifying Cost-Benefit

Implementation Guide

### RPS Implementation Complexity

- Technical RPS Requirements (final IG)
- Level of regional variability in implementation

Software Tools

### Software Tools

- Number of Vendors offering software to create RPS submissions
- Vendor pricing and solution approach
- Regulator implementation plans (will free tools be provided?)

Organizational variations

### Each regulator & company's needs & approach

- Each company's internal IT implementation requirements
- Current state of document and RA Data management at each company
- Internal company requirements for the software (beyond the RPS IG)



## Benefits of RPS

- Multiple regions using a harmonized, consistent format
  - reducing IT burden on industry
- Minimal revisions needed to address regional differences and/or requirements in content
- IT harmonization
  - End result is an IT format that can be reused for multiple regions, saving time and resources by mitigating the risk of significantly different methods being developed amongst regulators



## Implementation Phases

Work Phase & Outcome	Timing	Information Available/Stakeholder Engagement
<b>Scope &amp; Process Definition:</b>	Ongoing	<ul style="list-style-type: none"><li>• Types of submissions in scope by region</li><li>• High level understanding of structured information required in an RPS submission</li></ul>
<b>Draft IG Preparation</b>	March 2018	<ul style="list-style-type: none"><li>• Harmonized IG available for open consultation</li><li>• Harmonized controlled vocabulary available for open consultation</li><li>• Vendor discussions / engagement</li></ul>
<b>Testing</b>	Sept 2018	<ul style="list-style-type: none"><li>• Ongoing vendor discussion / engagement</li><li>• Visibility to test scenarios &amp; results</li></ul>
<b>Implementation Approach &amp; Governance Process</b>	TBD	<ul style="list-style-type: none"><li>• Final IG</li><li>• Regional IGs available for review &amp; comment</li><li>• Regulator implementation plans available for open consultation</li><li>• Draft IMDRF Governance process for discussion / review</li></ul>



## Benefits of RPS

- While initial implementation may be limited to basic structural functionality, RPS supports extensive business requirements that may be used in the future (e.g. document re-use, keywords on headings, etc.)



## Progress

- Technical resources have been secured from industry to reassess the workplan developed in June 2016 with some key deliverables scheduled in 2017.
- Sub-working group has rescoped project and shared with larger working group for approval
- Plan to progressively set milestones and deliverables with new workplan



## Table of Contents Update

- No new applications have been received into the pilot since March 2017.
- Applications that have been received and reviewed to-date by region:
  - Australia: 1
  - Brazil: 7
  - Canada: 2
  - China: 4
  - EU: 1
  - USA: 2



# Table of Contents Update

- Pilot scheduled to end fall 2017
- Working group will analyze results and feedback from both manufacturers and reviewers to determine if revisions to the structure are necessary
- Publish revise Table of Contents (March 2017) and discuss implementation plans



# Questions & Discussion

