Medical Device Clinical Evaluation (MDCE) Working Group Update

National Medical Product Administration, China

September 18th, 2018
Purpose

• Improve the effectiveness and efficiency of premarket review by promoting increased global harmonization in approach and requirements on leveraging and evaluating the available clinical evidence,

• Reduce the number of redundant clinical trials, integrate the principles of post-market clinical follow up and real world evidence, as applicable,

• Accelerate the introduction of new safe and effective medical devices/technologies to the patients in variable jurisdictions.
March 2018 Approved to update existing GHTF documents. 3 topics will be addressed (NWIP)

1. The Essential Requirements of Demonstrating Equivalence between the Device under Application and the Comparable Device for Clinical Evaluation.

2. The Decision-Making Principals for whether a Medical Device Clinical Trial should be Carried Out.

3. Guidelines for the Acceptance of Overseas Medical Device Clinical Trial Data.
### Proposed Update

<table>
<thead>
<tr>
<th>Topics</th>
<th>GHTF SG5 documents</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Demonstrating Equivalence for Clinical Evaluation</td>
<td>GHTF SG5 N1 &amp; N2.</td>
</tr>
<tr>
<td>2. Decision-Making Principals for whether a Clinical Trial should be Carried Out</td>
<td>GHTF SG5 N3.</td>
</tr>
<tr>
<td>3. Acceptance of Overseas Clinical Trial Data</td>
<td>GHTF SG5 N2 &amp; N3.</td>
</tr>
</tbody>
</table>

**Update 3 relevant GHTF SG5 documents**

- GHTF SG5 N1R8: 2007 *Clinical Evidence – Key Definitions and Concepts*
- GHTF SG5 N2R8: 2007 *Clinical evaluation*
- GHTF/SG5/N3:2010 *Clinical Investigations*
**Working Group**

**Australia:** Simon Singer

**Brazil:** Alessandro Ferreira do Nascimento, Leticia Barel Filier

**Canada:** Amanda Jones

**China:** Yinhui Liu (Chair), Shan Ju, Yawen Wang

**EU:** Camilla Fleetcroft, Gwennaelle EVEN

**Japan:** Yumiko Aoyagi, Daisuke Tanaka, Mami Ho, Daisuke Fujisawa

**Russia:** Valeeva Aisylu, Kurtukov Yaroslav

**Singapore:** Low Lai Peng

**South Korea:** Youngsook Choi, Youngmin Han

**the United States:** Soma Kalb, Minerva Hughes

**WTO/PAHO:** Micaela Dominguez

**DITTA:** Keiichiro Ozawa, Leo Hovestadt, Bradley Matsubara

**GMTA:** Michael Pfleger, Robin Newman, Theodore Lystig
Current Status

6.27 MC T-con Working group establishment.

7.17 1st WG T-con Kick-off meeting.

8.07 2nd WG T-con Acceptance of oversea clinical trial data.

8.23 3rd WG T-con Decision-making principals for whether a clinical trial should be carried out.

9.11 4th WG T-con Demonstrating equivalence for clinical evaluation.

- Completed the 1st round discussion for all 3 topics by teleconferences.
- Developed preliminary working drafts version1.
# Outcome of T-cons

<table>
<thead>
<tr>
<th>Date</th>
<th>Topic</th>
<th>Comments</th>
<th>Outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>June 27th</td>
<td>Kick-off Meeting</td>
<td>/</td>
<td>Reached agreement on the work plan and decided 3 documents to be updated.</td>
</tr>
<tr>
<td>July 17th</td>
<td>Acceptance of Oversea Clinical Trial Data</td>
<td>38</td>
<td>Generally met the agreement, the working draft may be finished after a few modification and check of wording.</td>
</tr>
<tr>
<td>August 7th</td>
<td>Decision-Making Principals for Clinical Trial</td>
<td>65</td>
<td>Had a full communication, needs modifications according to comments.</td>
</tr>
<tr>
<td>August 23th</td>
<td>Equivalence Demonstration</td>
<td>46</td>
<td>Reached agreement on most of changes, needs modifications and new adding according to comments.</td>
</tr>
</tbody>
</table>
**Work Plan**

<table>
<thead>
<tr>
<th>Timeline (approximate)</th>
<th>Mar</th>
<th>Apr</th>
<th>May</th>
<th>Jun</th>
<th>Jul</th>
<th>Aug</th>
<th>Sep</th>
<th>Oct</th>
<th>Nov</th>
<th>Dec</th>
<th>Jan</th>
<th>Feb</th>
<th>Mar</th>
<th>Apr</th>
<th>May</th>
<th>Jun</th>
<th>Jul</th>
<th>Aug</th>
<th>Sep</th>
</tr>
</thead>
<tbody>
<tr>
<td>MC Approval of NWIP</td>
<td>★</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Working Group Establishment</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construction (Preliminary WD(V1))</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>after Comment</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construction (Preliminary WD(V2))</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>after Comment</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construction (WD)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>after Comment</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>WD Submission and MC Review</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>MC Approval (PD)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>★</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Public Comments/Consultation</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construction (FD)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>after Public Comments Analysis</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>FD Submission and MC Approval</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>★</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Examples of proposed changes

1. Equivalence Demonstration

• “Whether data from comparable devices to support the safety and/or performance of the device in question.”

  e.g.
  -- Clinical data from multiple comparable devices
  -- Explanation of the “same intended use”

• Update definitions and quoted latest relevant IMDRF documents.

  e.g.
  -- Definition of clinical evaluation, comparable device, intended use/Purpose
  -- Quote IMDRF document of SaMD, registry data
2. Decision-Making Principle for Clinical Trial

• Update the crucial considerations in clarifying the need for clinical investigation
  e.g.
  -- Novelty of the device
  -- Risk level of the device
  -- Sufficiency of data from sources other than CI
  -- Balance in pre-market and post-market clinical data collection
  -- Data from CI generated in other jurisdiction(s)

3. Acceptance of Overseas Data

• Adding on N2
  
  A new appendix of “considerations when data form clinical Investigation are generated in different jurisdiction(s)”
  
  -- Regulatory requirements differences
  
  -- Internal and external factors

• Adding on N3
  
  -- Introduce Multi Regional Clinical Investigation as a consideration of clinical design.
  
  -- A series of definition related on MRCI
  
  MRCI\Region\Regulatory Region
Foundation of updates

- Regulations and guidelines from 10 member jurisdictions.
- The agreements of group members.
### Timeline

2018

- **Oct-Nov** Discussion and modification of preliminary working drafts (V1)
- **Dec 11th~14th** Face to face working group meeting to finalize 3 working drafts

2019

- **Jan-Feb** Submit working drafts to MC (milestone 1)
- **Mar** Working drafts to be considered during MC meeting
- **Mar-May** Public consultation period
- **June-July** Analysis and discuss comments Face to face working group meeting to finalize draft documents
- **Aug** Submit final documents to MC
- **Sep** Final documents to be considered during MC meeting (milestone 2)
Thank you