IMDRF Regulated Products Submission (RPS) WG Update

Nancy Shadeed
Health Canada
Updates

• Revisions to the IMDRF ToC
• Regional implementation update
• Future of RPS
Updates to ToC

• The ToC has been revised with the primary purpose of adding content from Singapore

• Opportunity taken to revise based on Health Canada’s recent review as part of their regional guidance development, including
  – Revision to definition of summary
  – Editorial changes including updated numbering to remove CH leading characters
  – Addition of the following regional heading for HSA:
    • 1.08-Expedited Review Documentation
Revision to Summary definition

• A summary should include a brief synopsis of the (1) purpose, (2) methods, (3) acceptance criteria, (4) results and (5) discussion and conclusions. Outliers and deviations should be reported with the results. Results should be stated quantitatively with appropriate statistical context where applicable (e.g. value ± SD, confidence intervals, etc.).

• The summary should specifically address:
  1. Why the characteristic being evaluated is of interest;
  2. Why the particular methods are being used to evaluate the characteristic, if applicable including why a regional or harmonized/recognized standard/guidance has or has not been complied with;
  3. How the stated acceptance and sample size are scientifically supported;
  4. What device was tested and how it relates to the devices that will be marketed;
  5. Why the tested components are representative of the range of devices that will be marketed;
  6. Whether the summary has been previously submitted and reviewed by the regulator, including identification of the device and the reference number for the submission; and
  7. The extent to which the duties and functions of a study (e.g. testing, monitoring, etc) have been conducted by an external organization (e.g. contract research organisation or individual contractor)
For applications with approvals from HSA’s reference regulatory agencies and applying for faster evaluation routes, following information is required:

- Declaration of no safety issues globally (refer to GN-15 for the template)
- Proof of marketing history in the independent reference regulatory agency’s jurisdictions i.e. Invoice with date, proof of sale or a declaration on marketing history (refer to GN-15 for the declaration template)

Refer to GN-15 available at [www.hsa.gov.sg](http://www.hsa.gov.sg) for more information
ToC Implementation

• Health Canada has published complete implementation guidance for the use of the ToC using a folder structure implementation

• Effective April 1, 2019 Health Canada will no longer accept STED as a submission format
ToC Implementation

• Some jurisdictions have indicated a willingness to accept the ToC structure as an optional format while others are reviewing its feasibility

• Further commitments from other jurisdictions will improve adoption and is encouraged
RPS

- Working group considering options for moving forward
- Sub-group exploring the possibility of an industry survey to gauge positions on electronic submissions
- RPS standard may be changing from HL7 to FHIR
Questions/comments

Thank you!