





Common post-market issues faced with software and how to address them?

**Rolf Oberlin Hansen – Danish Medicines Agency** 

# Problem types facing software – A regulators perspective

#### Clear information on reportability

Health care moves to @home care

#### Too many "anomalies"

What is an anomaly and why is it a software problem?

#### Intended use being too vague

Broad demographics, local implementation and value generation

#### Dependability and interoperability

Designing with the future in mind



## Clear information on reportability

"Software increases possibilities and empowerment"

- Identification of incidents
  - What constitutes an incident?
- Reportability criteria
  - Informing the citizens/user

#### Solution:

Use understandable language and do not hide intentions



## Too many "anomalies"

"Software can be anything, including complicated..."

- Can an anomaly occur in software?
  - Environmental effects
  - Interdependency
- Patches, recalls and corrective actions
  - Anomalies are often general

#### **Solution:**

Ensure testing matches the clinical workflow





## Intended use being too vague

- Intended use should describe the device use
  - Often overreaches and generalize
  - More software requires local adaptation
- Ambiguous language
  - Feature creep and software updates "within" scope
  - Intentionally misleading the consumer

#### **Solution:**

Adapt the Intended Use formulation to meet the target



## Dependability and interoperability

### "Today, everything is connected"

- Software building blocks
  - EHR's, data pipelines etc.
  - Solid API's save lives
- Hardware and library dependency
  - The time of integration is here

#### **Solution:**

Develop your system into the use scenario







## THANK YOU / QUESTIONS

+45 40 26 45 31

ROOH@DKMA.DK

#### Disclaimer

This document was produced by the International Medical Device Regulators Forum. There are no restrictions on the reproduction or use of this document; however, incorporation of this document, in part or in whole, into another document, or its translation into languages other than English, does not convey or represent an endorsement of any kind by the International Medical Device Regulators Forum.

Copy right 2021 by the International Medical Device Regulators Forum.





