Swiss Association for Quality

DANAHER

Fachgruppe Medizinprodukte

Medical Device Single Audit Program (MDSAP) Basiswissen

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Danaher

Ziele und Nutzen

Ziele

- Kennenlernen des MDSAP Audit Modells
- MDSAP Non-Conformity Grading System
- Umgang mit dem MDSAP Companion Document

Nutzen

- Anwenden des MDSAP Non-Conformity Grading Systems
- Verstehen des MDSAP Audit Prozesses

MDSAP
Allgemeines

Wozu MDSAP?

- Harmonisierung der Auditprogramme unter den teilnehmenden Ländern
- Anerkennung des MDSAP Audit Reports als Ersatz für eine routinemässige Inspektion oder eines Notified Body Audits
- Einschränkung des Audit Tourismus – Reduktion von Audittagen

- Pharma Industrie hatte ähnliche Idee → PIC/S
- Gegründet in 1970
- 47 Mitgliedstaaten
- Nicht bindende Vereinbarung

MDSAP Geschichte und aktueller Stand

- 2012: Beauftragung einer Arbeitsgruppe unter der Führung des IMDRF – International Medical Device Regulators Forum (ehemals GHTF)
  - Teilnehmende Organisation/Länder
    - Therapeutic Goods Administration (TGA) of Australia
    - Brazil's Agência Nacional de Vigilância Sanitária (ANVISA)
    - Health Canada (HC)
    - Japan's Ministry of Health, Labour and Welfare (MHLW) and the Japanese Pharamceuticals and Medical Devices Agency (PMDA)
    - US Food and Drug Administration (FDA)
  - Beobachter
    - World Health Organization (WHO)
    - European Union (EU)
    - Prequalification of In Vitro Diagnostics Program
- 2014 – 2016: Pilot Test Phase
- 29. Juni 2017: Abschlussbericht

MDSAP Audit Program

- Basiert auf Norm ISO 13485:2016
- Länderspezifische Anforderungen
  - Australien: Therapeutic Goods Administration (TGA)
  - Brasilien: Agência Nacional de Vigilância Sanitária (ANVISA)
  - Kanada: Health Canada
  - USA: US Food and Drug Administration (FDA)
  - Japan: Ministry of Health, Labor and Weflare (MHLW), Pharmaceuticals and Medical Device Agency (PMDA)

→ Keine neue regulatorische Anforderung!





MDSAP Audit Program

- Ersetzt nicht
  - «for cause» Audits (gilt für alle Behörden)
  - Pre-Approval und Post-Market Inspection für Produkte
  - Brasilien: INMETRO for electrical safety
  - USA: US FDA Center for Devices and Radiological Health (CDRH) audits for radiation-emitting devices

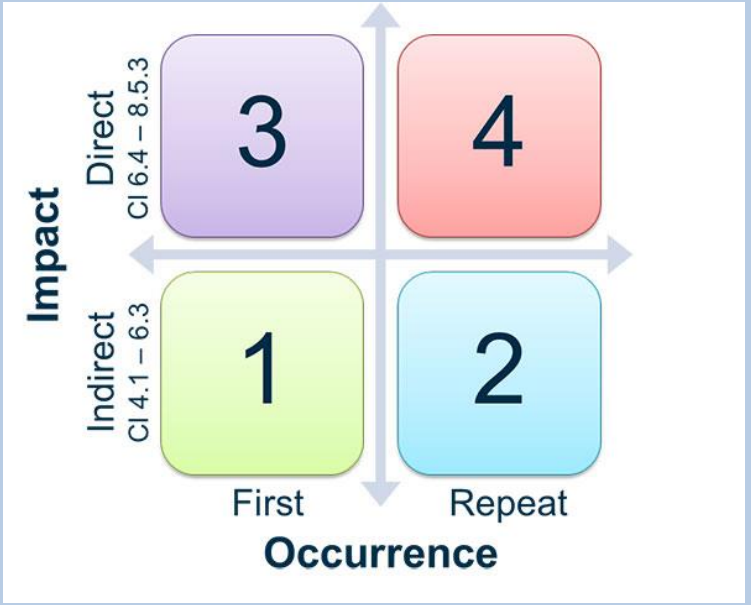
MDSAP
Non-Conformity Grading System

MDSAP Non-Conformity Grading System I

- Nonconformity Grading System for Regulatory Purposes and Information Exchange
  http://www.imdrf.org/docs/ghtf/final/sg3/technical-docs/ghtf-sg3-n19-2012-nonconformity-grading-121102.pdf
- Non-Conformity muss sich auf ein Normkapitel beziehen (3. Ebene, x.x.x)
  - Beispiel: *7.3.3 – Design and Development Input*
- Repeat Non-Conformity: Wenn NC sich auf dasselbe Normkapitel bezieht
  - Beispiel: *Nachweise für Anlagenwartung fehlen* → *7.5.1*
    Reinraum ist nicht überwacht (Monitoring fehlt) → *7.5.1*
- Länderspezifische Abweichungen ausserhald der ISO 13485 werden nicht bewertet jedoch referenziert.

MDSAP Non-Conformity Grading System II

- QMS Impact
  - Indirect Impact
    ISO 13485, Kapitel 4.1 bis 6.3
  - Direct Impact
    ISO 13485, Kapitel 6.4 bis 8.5
- Occurence
  - First
  - Repeat



Step 1

- Escalation Rules
  - Absence of a documented process or procedure +1
  - Release of a Nonconforming Medical Device +1

Step 2

MDSAP Non-Conformity Grading System - Beispiele

Nonconformity	Step 1 Grade	Step 2 Grade	Final Grade
There is no objective evidence of the establishment of quality objectives for 2017, as required in the auditee's Quality Manual. The same nonconformity was cited during MDSAP audit of 2016.	2	0	2
Management reviews are held quarterly per procedure number DOC 12345. However, there is no documentation of the third-quarter management review meeting for 2017.	1	0	1
Competence, Awareness and Training processes are absent from the QMS. Documented evidence for training could not be provided. This NC was also raised in previous MDSAP audits (2016, 2017)	2	1	3

MDSAP Non-Conformity Grading System - Diskussion

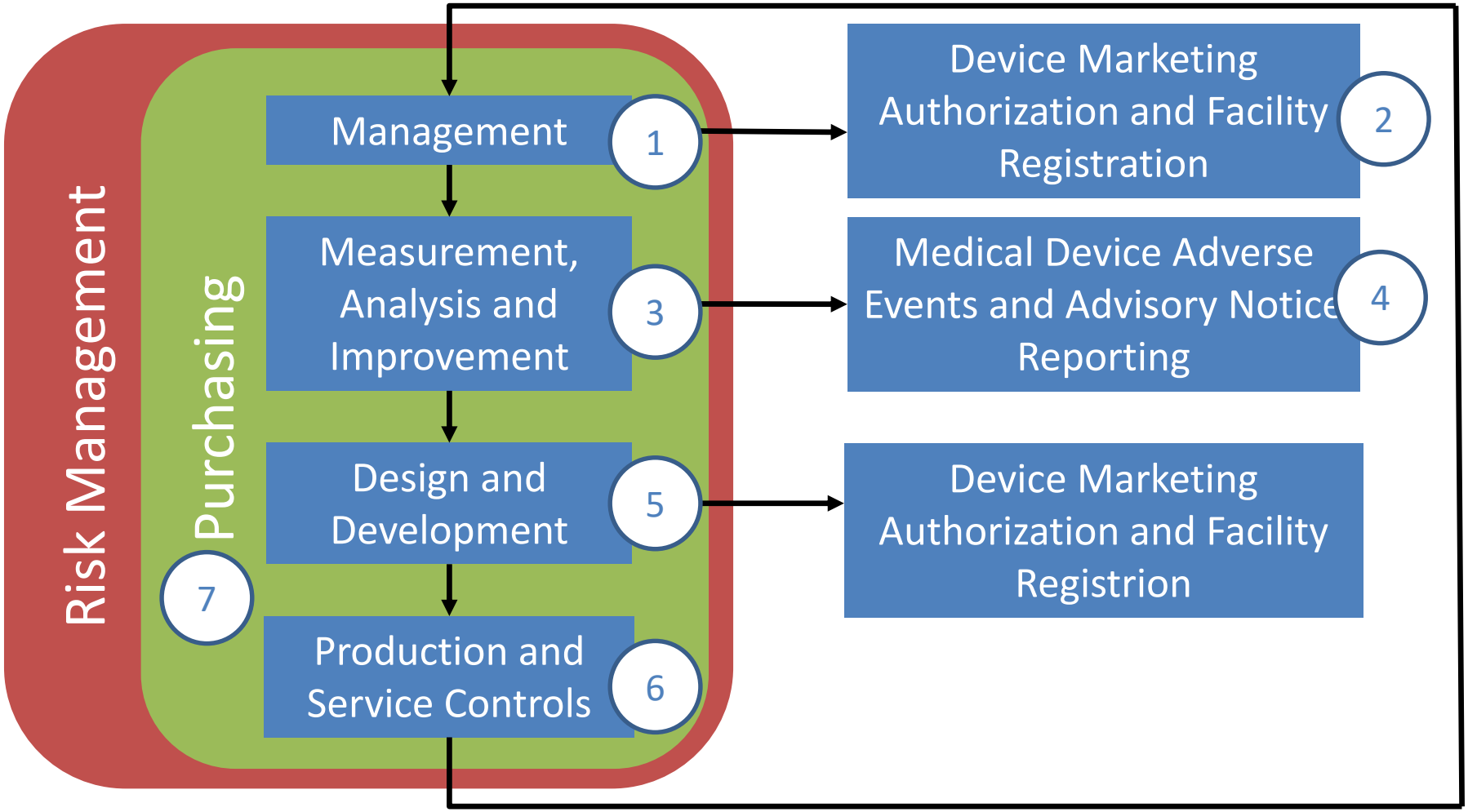
- Vorteile
  - transparent
  - nachvollziehbar
  - vergleichbar
- Nachteile
  - Schweregrad der Abweichung wird nicht berücksichtigt
  - Geringe Korrelation mit bisherigen Bewertungssystemen
  - Unterliegt weiterhin der Subjektivität des Auditors
    → MDSAP Audit Model bietet meistens einen direkten und indirekten Normbezug zur Auswahl

MDSAP
Audit Model

MDSAP Audit Model / Companion Document

- MDSAP Audit Model
  https://www.fda.gov/downloads/medicaldevices/internationalprograms/mdsappilot/ucm390382.pdf
- MDSAP Companion Document
  https://www.fda.gov/downloads/MedicalDevices/InternationalPrograms/MDSAPPilot/UCM390383.pdf

MDSAP Audit Model



MDSAP Companion Document I

- Aufbau der Chapter
  - Purpose
  - Outcomes
  - Links
  - Audit Taks
  - Standard References

Medical Device Single Audit Program

Chapter 4

Process: Medical Device Adverse Events and Advisory Notices Reporting

The Medical Device Adverse Events and Advisory Notices Reporting process may be audited as a linkage from the Measurement, Analysis and Improvement process.

Purpose: The purpose of auditing the Medical Device Adverse Events and Advisory Notices Reporting is to verify that the organization's processes ensure that individual device-related adverse events and advisory notices involving medical devices are reported to regulatory authorities within required timeframes.

Outcomes: As a result of the audit of the Medical Device Adverse Events and Advisory Notices Reporting process, objective evidence will show whether the organization has:

A) Defined processes to ensure individual device-related adverse events are reported to regulatory authorities as required

B) Ensured that advisory notices are reported to regulatory authorities and authorized representatives when necessary

C) Maintained appropriate records of individual device-related adverse events and advisory notices

Links to Other Processes: Measurement, Analysis and Improvement

Audit Tasks and Links to Other Processes:

1. **Verify that the organization has a process in place for identifying device-related events that may meet reporting criteria as defined by participating regulatory authorities. Verify that the complaint process has a mechanism for reviewing each complaint to determine if a report to a regulatory authority is required. Confirm that the organization's processes meet the timeframes required by each regulatory authority where the product is marketed.**

   Clause and regulation: [ISO 13485:2016: 4.2.1, 7.2.3, 8.2.2, 8.2.3; see the country-specific requirements below]

MDSAP Companion Document II

- Aufbau der Process Area
  - Purpose
  - Outcomes

Chapter 2

Process: Device Marketing Authorization and Facility Registration

The Device Marketing Authorization and Facility Registration process may be audited as a linkage from the Management process and/or the Design and Development process.

Purpose: The purpose of auditing the Device Marketing Authorization and Facility Registration process is to verify that the organization has performed the appropriate activities regarding device marketing authorization and facility registration with regulatory authorities participating in the MDSAP.

Outcomes: As a result of the audit of the Device Marketing Authorization and Facility Registration process, objective evidence will show whether the organization has:

A) Complied with requirements to register and/or license device facilities

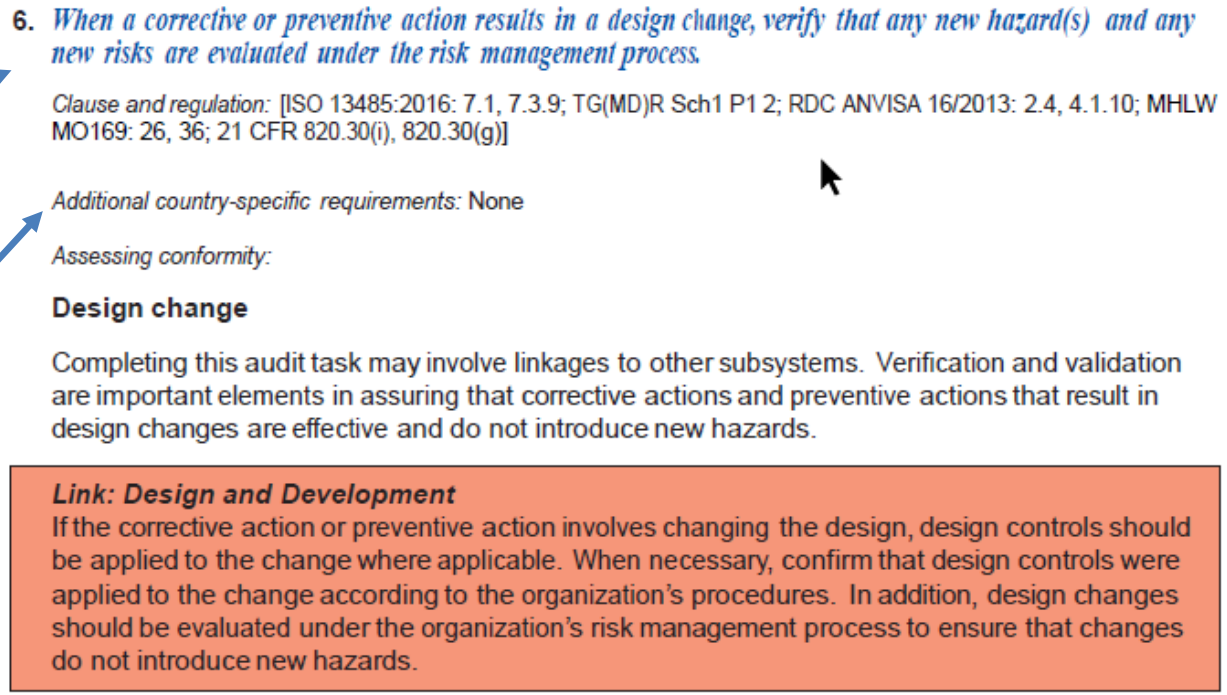
B) Submitted device listing information to regulatory authorities when applicable

C) Obtained device marketing authorization in the appropriate jurisdictions

D) Arranged for assessment of changes (where applicable) and obtained marketing authorization for changes to devices or the quality management system which require amendment to existing marketing authorization

MDSAP Companion Document III

- Aufbau der Audit Tasks und Farbkodierung
  - Audit Task *Blau, Kursiv* = Risk Management
  - Country-specific requirement
  - Links



6. *When a corrective or preventive action results in a design change, verify that any new hazard(s) and any new risks are evaluated under the risk management process.*

Clause and regulation: [ISO 13485:2016: 7.1, 7.3.9; TG(MD)R Sch1 P1 2; RDC ANVISA 16/2013: 2.4, 4.1.10; MHLW MO169: 26, 36; 21 CFR 820.30(i), 820.30(g)]

Additional country-specific requirements: None

Assessing conformity:

Design change

Completing this audit task may involve linkages to other subsystems. Verification and validation are important elements in assuring that corrective actions and preventive actions that result in design changes are effective and do not introduce new hazards.

Link: Design and Development
If the corrective action or preventive action involves changing the design, design controls should be applied to the change where applicable. When necessary, confirm that design controls were applied to the change according to the organization's procedures. In addition, design changes should be evaluated under the organization's risk management process to ensure that changes do not introduce new hazards.

MDSAP Companion Document IV

- Companion Document liefert zusätzliche Hinweise für den Auditor

4. Determine if investigations are conducted to identify the underlying cause(s) of potential nonconformities, where possible. *Confirm investigations are commensurate with the risk of the potential nonconformity.*

Clause and regulation: [ISO 13485:2016: 8.5.3; TG(MD)R Sch3 P1 1.4(3)(a),(b), (5)(b)(iii),(f),TG(MD)R Sch1 P1 2; RDC ANVISA 16/2013: 2.4, 7.1.1.1; MHLW MO169: 64; 21 CFR 820.100(a)(2)]

Additional country-specific requirements: None

Assessing conformity:

Investigations of potential nonconformities

The depth of the organization's investigation into potential process, product, or other quality system nonconformities should be commensurate with the risk of the nonconformity if it were to occur. The process for determining the extent of an investigation may be linked to the organization's risk management system and outputs essential to the proper functioning of the device.

Selecting records

When selecting records of investigations to review, be mindful of the risk of the potential nonconformity to the product or process. Select records of investigations where the potential nonconformity has a higher risk of adversely affecting the ability of the finished device to meet its essential design outputs or the potential nonconformity could affect the safety and efficacy of the product.

MDSAP Audit Model - Diskussion

- Vorteile
  - strukturiert
  - Zweck und Ergebnis der Tasks sind klar definiert
  - Deming-Kreis als Grundlage → PDCA
  - Ganzheitliche Betrachtung des QMS
    - Vertikal → direkt/indirekt
    - Horizontal → Links
- Nachteile
  - Stichprobengrösse ist nicht statistisch begründet
    Vergleich: QSIT binomial sampling
  - «doppelt gemoppelt» →Verwässerung des eigentlichen Problems
  - Subjektivität

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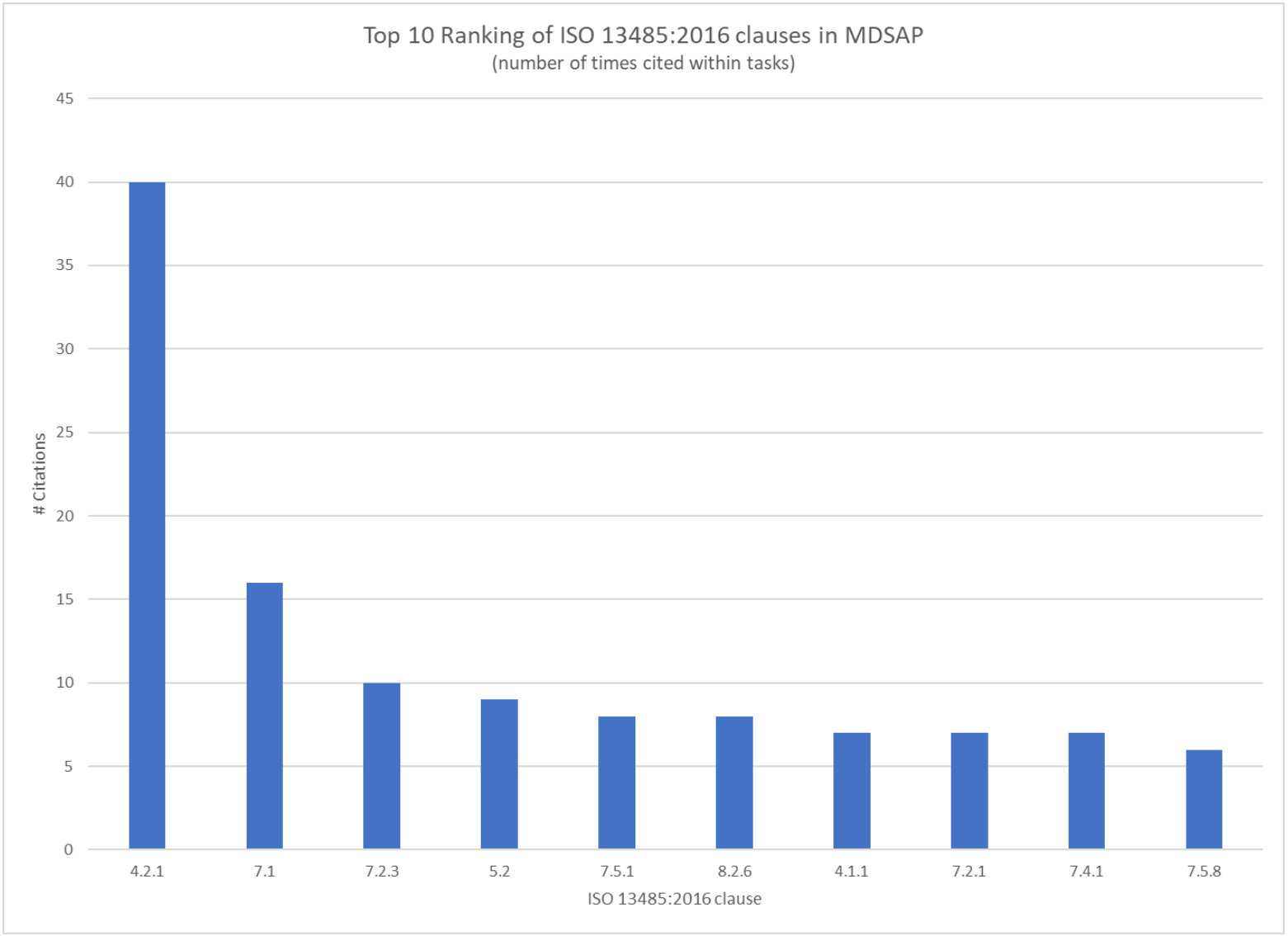
Bitte Feedback Fragebogen ausfüllen!

Back Up

	Requirements
	Therapeutic Goods Act 1989 Therapeutic Goods (Medical Devices) Regulations 2002 TGA Schedule 3
	ANVISA Pre-Market Approval RDC 185/2001 ANVISA Good Manufacturing Practices RDC 16/2013 ANVISA GMP Certification – Requirement for Product Registration RDC 25/2009 ANVISA PMS RDC 67/2009 - Vigilance and RDC 23/2011 - Field Actions
	Food and Drugs Act R.S.C., 1985, c. F-27 CMDR SOR-98-282
	Quality System Regulation 21 CFR 820, 21 CFR 806, 21 CFR 807 - Subparts A to D
	MHLW Ministerial Ordinance No. 169 Article 4 to Article 68 PMD Act (as applicable)


Top 10 Ranking of ISO 13485:2016 clauses in MDSAP
(number of times cited within tasks)
Citations
45
40
35
30
25
20
15
10
5
0
4.2.1
7.1
7.2.3
5.2
7.5.1
8.2.6
4.1.1
7.2.1
7.4.1
7.5.8
ISO 13485:2016 clause