

# Advanced Medical Technology Association

Jeffrey Secunda Associate Vice President Technology & Regulatory Affairs Auto-ID Working Group

BRINGING INNOVATION TO PATIENT CARE WORLDWIDE

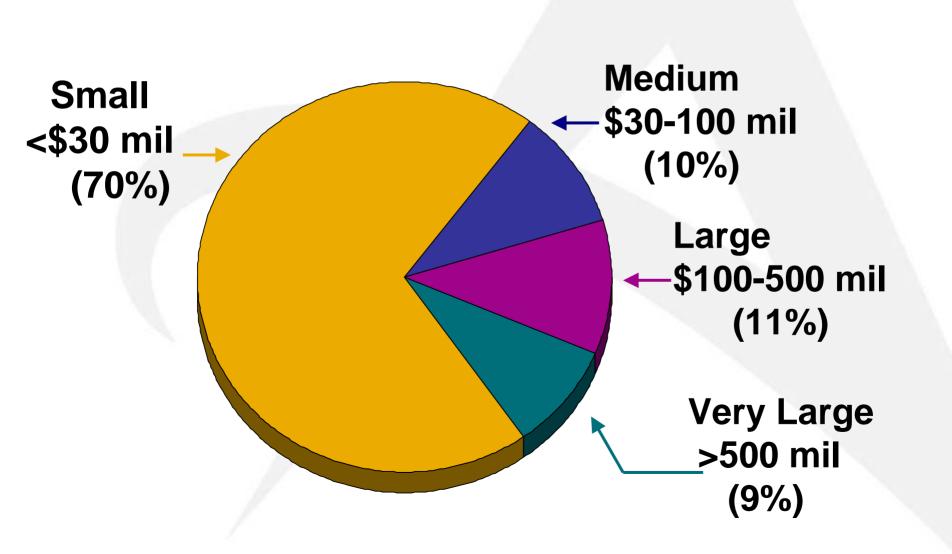
#### **AdvaMed Growth**



- Founded in 1974 as the Health Industry Manufacturers Association (HIMA)
- Now grown to 1,300 + member companies and subsidiaries (devices, diagnostics, HIS)
- Nearly 90% of domestic market
- \$20 million budget, 60 staff with global expertise
- 45 member Board of Directors

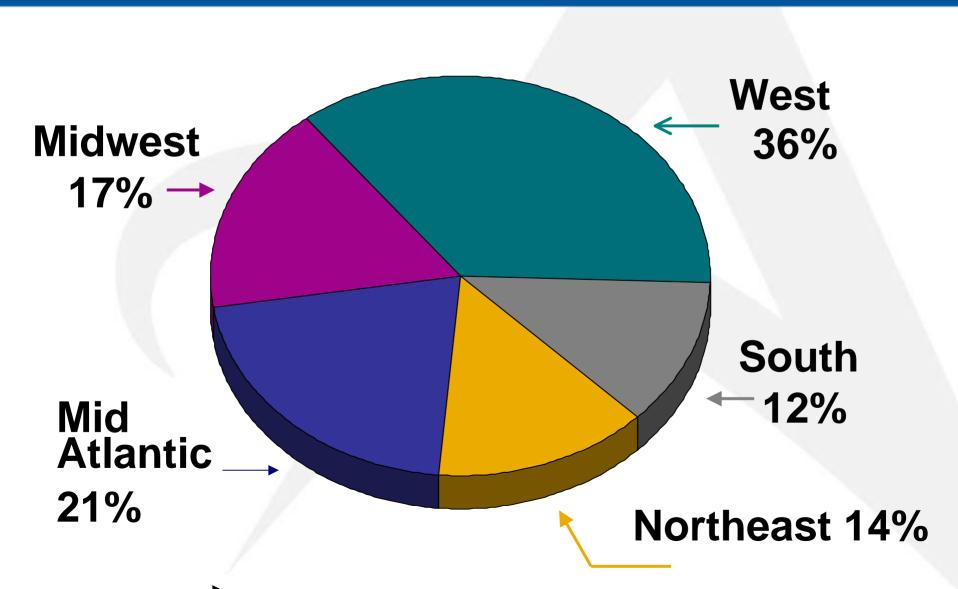
2005 Active Members By Company Size





Member Companies By Region





#### The Issues We Work On



# **Goals**

- Gaining rapid clearance by FDA
- Ensuring adequate payment
- Speeding coverage determinations here and abroad
- Accessing international markets

#### **Government Affairs Department**



- Lobbying Congress
  - Hill meetings,
  - Briefings on issues,
  - Med Tech Caucus





- Represent industry before legislative committees and regulatory agencies
  - Track and Report on Priority Initiatives
  - Convene ad hoc issue-specific committees
  - Submit comments
  - Organize member-legislator meetings

## **Payment Department**



# **2006 Policy Focus**

- Medicare Inpatient Payments
- Medicare Hospital Outpatient Payments
- Secure an Adjustment to Medicare Inpatient and Outpatient Rates to Account for Charge Compression
- Develop Policies to Make Possible Passage of Legislation to Update/Reform the Clinical Laboratory Fee Schedule (CLFS)
- Medicare Remote Monitoring Services Legislation
- Engaged in Developing Quality Standards to Ensure the Medical Technology Industry Issues are Reflected in the Measures

# **Global Strategy and Analysis Department**



# **2006 Policy Focus**

- Reorient Japan policies to recognize value of technology
- Gain recognition of the value of technology (VOT)
- Establish appropriate reimbursement systems
- Accelerate efficient and effective regulatory regimes
- Develop close international policy collaboration
- Substantial Reduction of trade barriers

#### **Public Affairs Department**



# **Strategic Imperative**

Communicate the value of medical technology through developing, supporting and conveying a compelling message to patients, health care providers, government officials and the media



# **Primary Goal**

• Work to ensure an appropriate premarket and postmarket regulatory environment both domestically and globally



# **2006 Policy Focus**

#### **MDUFMA Reauthorization**

- Improved Performance
- Stable and Predictable Fees
- Third-Party Review
- Third-Party Inspection
- Reuse
- Appropriate Regulatory Scheme for IVDs
- Guidance documents

#### **Combination Products**

- Cross-Labeling
- Adverse Events
- GMP's
- Number of Submissions

#### Postmarket

- Recalls
- Unique Identifiers
- Condition of Approval/522 Studies
- Annual Reports
- MDRs
- Risk Communication

#### **Critical Path**

- Device Development Models
- Surrogate Endpoints for Drug-Eluting Stents
- Other Initiatives



## **Standards Involvement**

- Member ISO TC 212 Clinical laboratory testing and in vitro diagnostic test systems
- Clinical Laboratory Standards Institute
- Member US National Committee of the IEC Technical Management Committee
- US Technical Advisor for IEC TC 62 and SC 62A IEC 60601-1 general standard for the safety of electrical medical devices, and associated collateral standards - US Chief delegate at TC/SC meetings
- Member IEC TC 62 Chairman's Advisory Group main strategy group for international committee
- Co-Chair of AAMI Electrical Safety Committee



- Co-chairs: Tom Werthwine (J&J) & Jackie Elkin (Medtronic)
- 90+ Individuals representing 40+ AdvaMed Members Companies
- Support Standards Development: GS/1, EPCglobal, HIBCC
- Oppose legislative proposals to restrict the use of Auto-ID



- FDA Stakeholder Meeting on UDI (April, October 2005)
- Supports the development of Auto-ID technology and standards that address specific patient and public health safety problems



- What are the Problems?
- Eastern Research Group Report on UDI (March 2006)
  - Use Error
  - Device interactions
  - Counterfeiting
  - MDR Analysis
  - Recalls Tracking



- Attacking the Problem
- Root Cause Analysis
- Risk Analysis
  - Severity
  - Frequency
  - Mitigation
- Solution
  - Device
  - Use
  - Unintended Consequences



- Device Characteristics
  - Risk Class
  - Physical size, material
  - Packaging
  - Use
  - Distribution



- Use Characteristics
  - Professional
  - Self /Family
  - Care setting
    - Hospital
    - Non-hospital institution
    - Home
  - Processing Disposable, Reusable



- Unintended Consequences
  - Technology limitations
  - Implementation costs
  - Adoption



# **Auto-ID Working Group**

**Elements of Device Identity** 

- What is it Category
- Who made it Manufacturer
- What was made Model, packaging
- How/When was it made LOT / Serial Number
- Other info expiration, materials, reprocessing, handling



#### F D A C D R H – Current Regulations

- Design & Manufacturing
  - 21 CFR 820 Quality System Regulation
- Labeling
  - 21CFR 801: General Provision for Labeling
    - 21 CFR 801.400 Special Requirements for Specific Devices
  - Section 301: Prominent and Conspicuous Mark of Manufacturers Who Reprocess Single-Use Devices
- Adverse Event Reporting
  - 21 CFR 803: Medical Device Reports (MDR)
- Recalls
  - 21 CFR 806: Corrections & Removals
  - 21 CFR 810: Recall Authority
  - 21 CFR 821: Device Tracking (SMDA:1990)



# **Concluding Points**

- 1. Work with all Stakeholders to identify specific safety problems that can be mitigated by the application of Auto-ID
- 2. Support the develop of consensus standards for different modes and applications of Auto-ID
- 3. Solutions to patient safety problems must include a clear plan for adoption by the users
- 4. Medical devices are extremely diverse in size, materials, processing, use, and criticality
- 5. Mandatory bar code rule for medical devices will increase cost and complexity for users, with little assurance of improving patient safety

# www.advamed.org







# THANK YOU !