

Alternatives to PMCF Clinical Investigations

LIVE

Webinar March 14th 2023 | 14.30 CET / 9.30 am ET



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Presenters



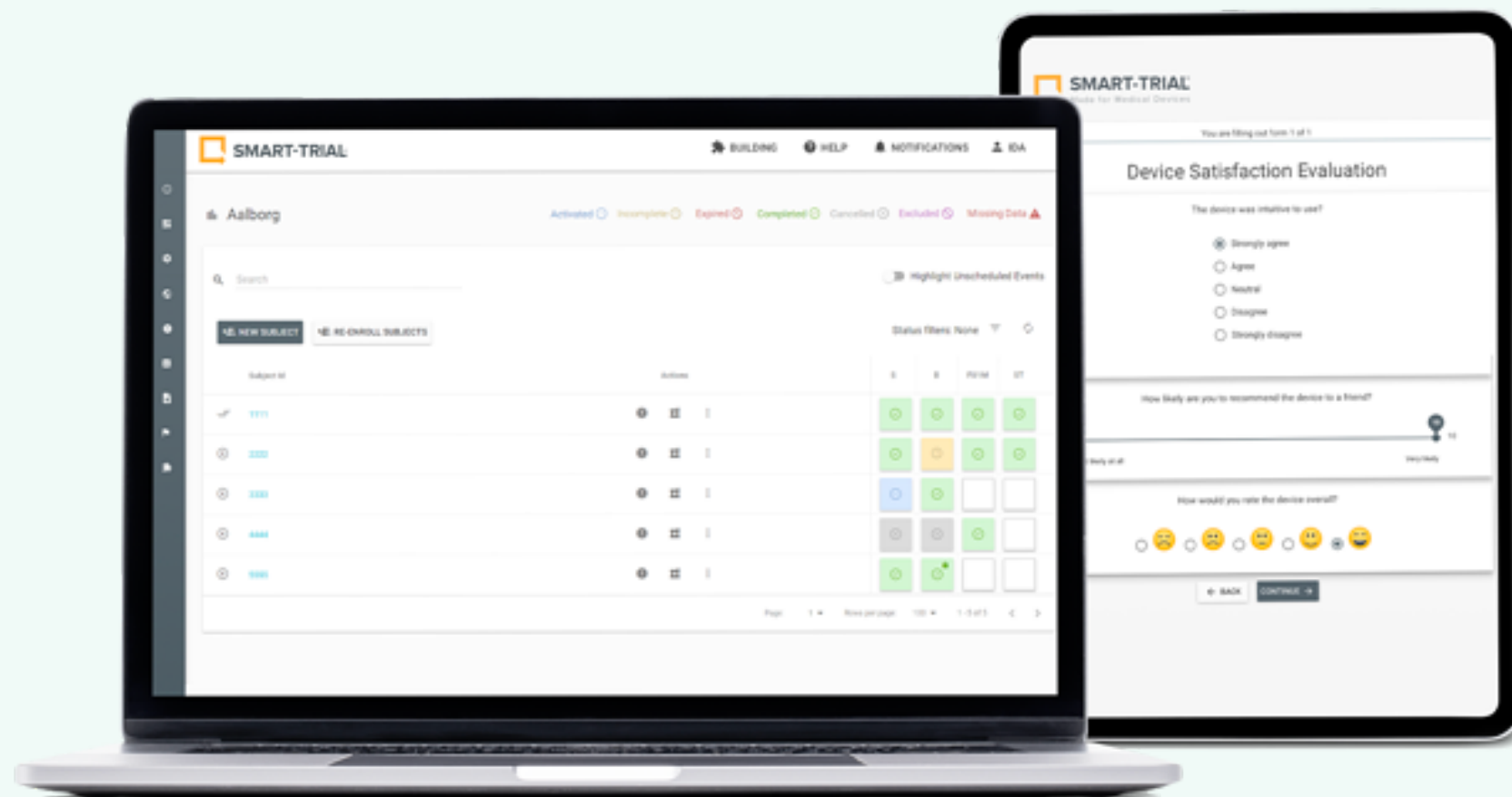
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Why This Topic?

PMCF under the EU MDR is of higher importance (than under MDD)

Manufacturers are looking for ways to accomplish PMCF effectively



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What Is The Role of PMCF?

How does PMCF fit with the rest of the EU MDR requirements?



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EU MDR

EU MDR DEVICE CLASS	CE Report	PMS Plan	PMS Report	PMCF Plan	PMCF Report	PSUR	SSCP
<i>EU MDR References</i>	<i>Article 61 & Annex XIV Part A</i>	<i>Article 84</i>	<i>Article 85</i>	<i>Annex XIV, Part B</i>	<i>Annex XIV, Part B</i>	<i>Article 86</i>	<i>Article 32</i>
I							
IIa							
IIb							
III							

 Update annually

 Update at least every two years

 Only implantable

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Continuous Effort



Clinical Evaluation

VS

Reality

Post-Market Clinical Follow-Up (PMCF)

PMCF plan - methods and activities



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Generic vs. Specific Methods

Generic

- Literature and publications
- Market feedback
- Public sources of information

Specific

- Clinical Investigations (observational and interventional)
- Case Series and Surveys
- Investigator Initiated Study

Does the new EU MDR timeline impact PMCF?



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NOPE



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New EU MDR Timeline & PMCF

Sign a written agreement for conformity assessment before expiration of MDD certificate or before Sep. 26 2024



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Planning Ahead

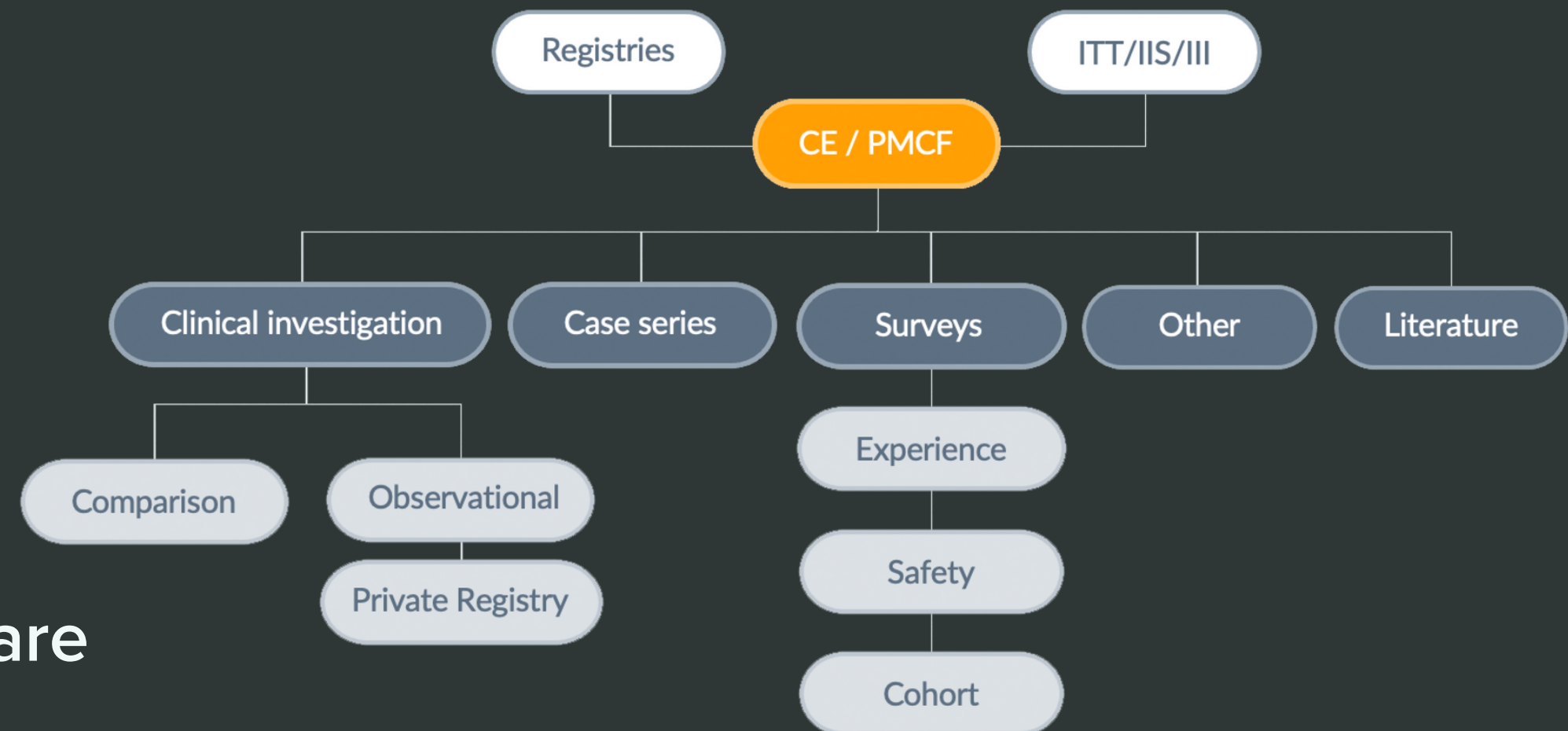
What factors decide your choice of activity for PMCF?



Bianca Lutters
PhD & Head of Clinical Operations &
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Considerations for Selecting a PMCF Activity

- ▶ Need/Goal
- ▶ Device and lifetime
- ▶ Gaps in clinical data
- ▶ Sales volume and market share
- ▶ Timelines



Diving In

What is your need?

- Sufficient clinical data - MDR
- PMCF / real-world data regulatory requirements
- Based on PMS data / PMCF data / risk management
- Reimbursement

New device or longer on the market?

- Clinical study data available vs. lots of clinical data available



Medical Device and Lifetime

- ▶ High-risk vs. lower-risk
- ▶ Implantable
- ▶ HCP vs. lay-user
- ▶ Long lifetime vs. short

Factors at Play

Gaps in clinical data

- Variants
- Use
- Lifetime not covered
- Patient group
- Off-label use

Sales volume and market share



Timelines



Alternative Options

to Clinical Investigations with focus on
collecting patient-specific data



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Survey of HCP - prospective, retrospective

- ▶ Direct contact with HCP is needed
- ▶ Mainly works if you have gaps in clinical data on variants, uses, patient groups
- ▶ Gather information on off-label use
- ▶ Only works in some cases, for long lifetime devices

Healthcare Panel Questionnaires/Surveys

- ▶ Sufficient sales and no. of devices in market
- ▶ Mainly works if you have gaps in clinical data on variants, uses, patient groups
- ▶ Gather information on off-label use
- ▶ Only works in some cases, for long lifetime devices

Data Collected by Device

Devices with software
components that collect data



If information collected supports
safety and performance



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Scraping Healthcare Records

- ▶ Sufficient sales
- ▶ Mainly works if you have gaps in clinical data on variants, uses, patient groups
- ▶ Only works in some cases, for long lifetime devices
- ▶ Depending on what is documented in healthcare records

Retrospective Case Series

Full use of device

- ▶ Direct contact with HCP
- ▶ Patients can be selected
- ▶ Patient visits HCP during full use
- ▶ Long lifetime in some cases



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Lay User Cohorts

- ▶ Sufficient sales
- ▶ Simple questionnaire
- ▶ Patients can be reached with marketing



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Literature Search for Your Own Device

Are you sure you have all papers for your device?



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Key Takeaways

Design your PMCF activity well !

- Suitable for your need
- Endpoints and acceptance criteria
- Statistically sound sample size
- Well-designed questionnaire

**Don't wait !
The time is NOW**



Time for

Q&A



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