

QAdvis – Key competence areas

QMS In-the-cloud

Turn Key QMS
Digital Signatures
Efficient and Lean

System Development

Product Software Validation
Computer Systems Validation
Risk Management
Verification and Validation
Process Validation

European Authorised Representation

Providing European representation for non-EU MedTech manufacturers Founding member of EAAR (European Association of Authorized Reps)

UK Responsible
Person
Founding member of
UKRP Association

Training/Courses

CE-Marking, MDR, IVDR ISO 13485 & QSR & MDSAP IEC 62304 & IEC 82304-1 IEC 60601-1 IEC 62366-1

Risk Management And more...

Agile, Lean and Six Sigma

Training and consulting in cooperation with US partner

QA&RA/Clinical Consumg

Interim Management, Expert Advise
Audits/Mock audit/Due Diligence
Warning Letters, Compliance Projects
PMA, 510k, CE-Marking, Tech Doc
Global Regulatory Support
Clinical Evidence, Clinical evaluations
Vigilance, Recalls, Post market

Presentation of the speaker – Cilla Lundevall



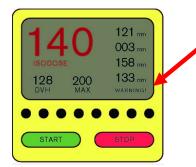
- Senior Quality and Regulatory Consultant @ QAdvis
- MSc EE & Medical Radiation physics
- 24 years in Medical Device Industry
- 20 years in Medical Device QA
 - V&V
 - QA/RA Consultant
 - PRRC, Head of QA/RA



Usability and Medical Devices

Some examples from UPAXA (The User Experience Professionals Association)





- Glucose meter recall poor visibility decimal point
- Monitoring device recall ineffective alarm system
- "In 2008, the FDA recalled an ultrasound system because the graphics made users misunderstand the image orientations of the patient's left and right sides"

Ref: http://uxpamagazine.org

Agenda

1. Regulations & Standards

2. Overview & Definitions

3. The Usability Engineering Process

4. Q&A

Regulatory Context



Medical Device Directive

AIMDD

Active Implantable Medical Device Directive

IVDD

In Vitro Diagnostic

Medical Device Directive



MDR

Medical Device Regulation

GSPRS

IVDR

In Vitro Diagnostic Medical Device Regulation

Regulations and Standards (EU)



MDR = the Medical Device Regulation (Regulation 2017/745)

IVDR = the In Vitro Medical Device Regulation (Regulation 2017/746)

MDR / IVDR Requirements on Usability – GSPR 5

In eliminating or reducing risks related to use error, the manufacturer shall

Design for patient safety

Design for lay, professional, disabled or other users

Reduce as far as possible the risks related to the ergonomic features of the device and the environment in which the device is intended to be used

technical knowledge experience education

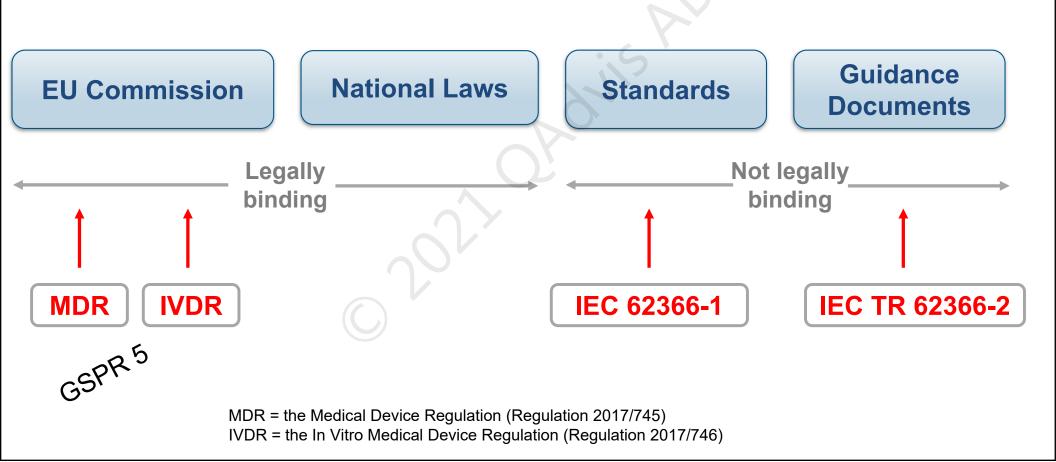
training

medical and physical conditions

use environment

GSPR = General Safety and Performance Requirement

Regulations and Standards (EU)



Usability

IEC 62366-1:2015/A1:2020 IEC TR 62366-2:2016



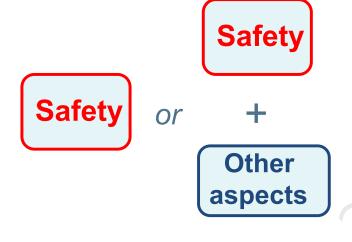
EUROPEAN STANDARD EN 62366-1:2015/A1

NORME EUROPÉENNE

EUROPÄISCHE NORM August 2020



Focus on Safety



Manufacturers can choose to implement a usability engineering program focused narrowly on safety or more broadly on safety and other attributes

Definitions – User - Usability



User

Person **interacting with** the medical device

E.g. nurses, physicians, laboratory technicians, patients, service personnel

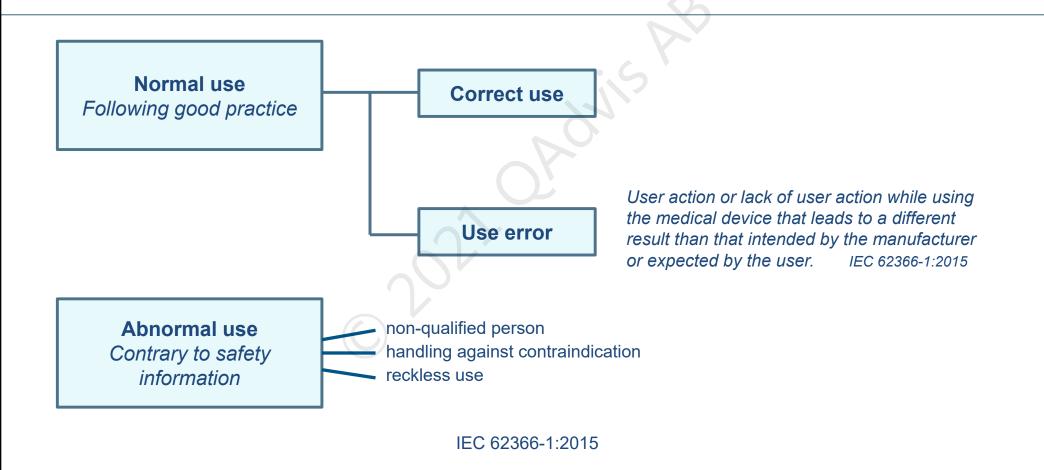
Usability

Characteristic of the user interface that **facilitates use** and thereby establishes effectiveness, efficiency and user satisfaction in the intended use environment

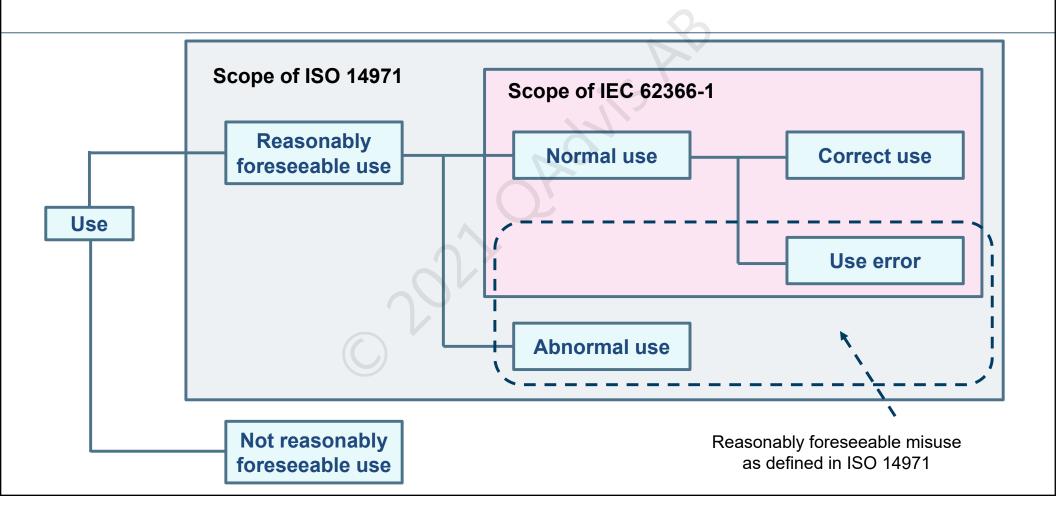
effectiveness = accuracy and completeness with which users achieve specified goals efficiency = resources expended in relation to effectiveness

IEC 62366-1:2015

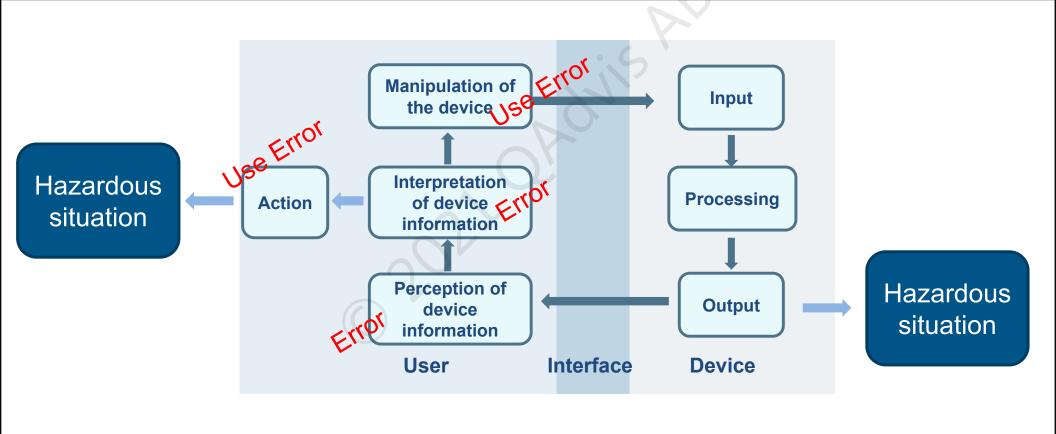
Definitions – normal/abnormal use, use error



Definitions – normal/abnormal use, use error



Hazardous situations

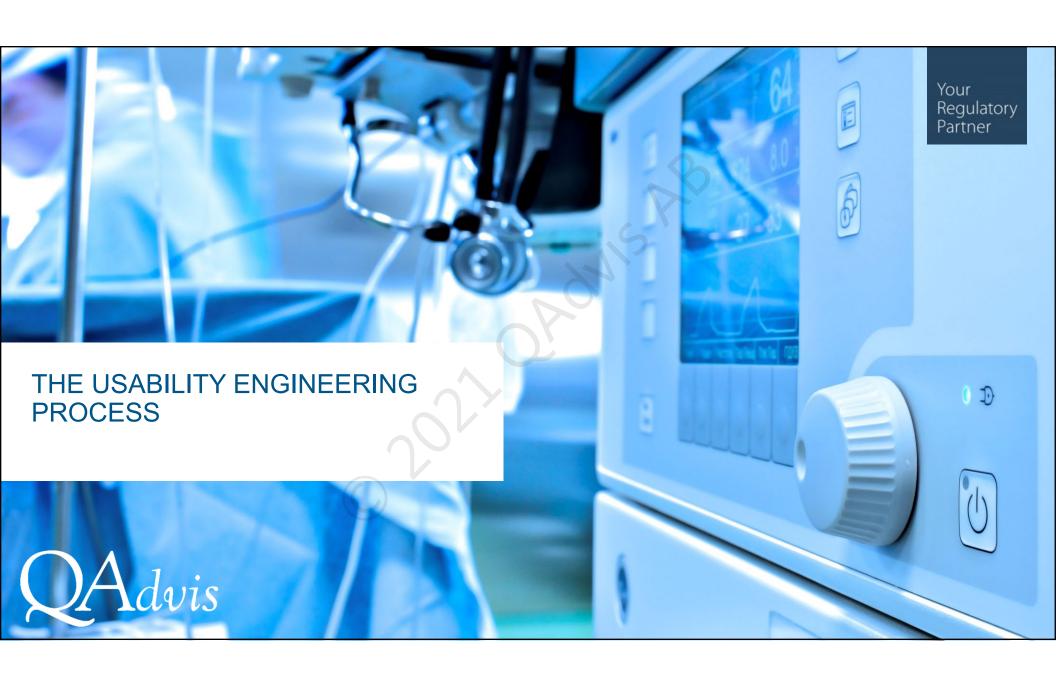


User Interface of Unknown Provenance (UOUP)



User interface or part of user interface of a medical device previously developed for which adequate records of the usability engineering process of this standard are not available

IEC 62366-1:2015



The Usability Engineering Process – General



- The manufacturer shall establish, document and maintain a Usability Engineering Process to provide safety for the patient, users and others
- The process shall address **user interactions** with the medical device according to the accompanying document, including, but not limited to:
 - Transport
 - Storage
 - Installation
 - Operation
 - Maintenance & repair
 - Disposal

IEC 62366-1:2015

Tailoring of the Usability Engineering Process

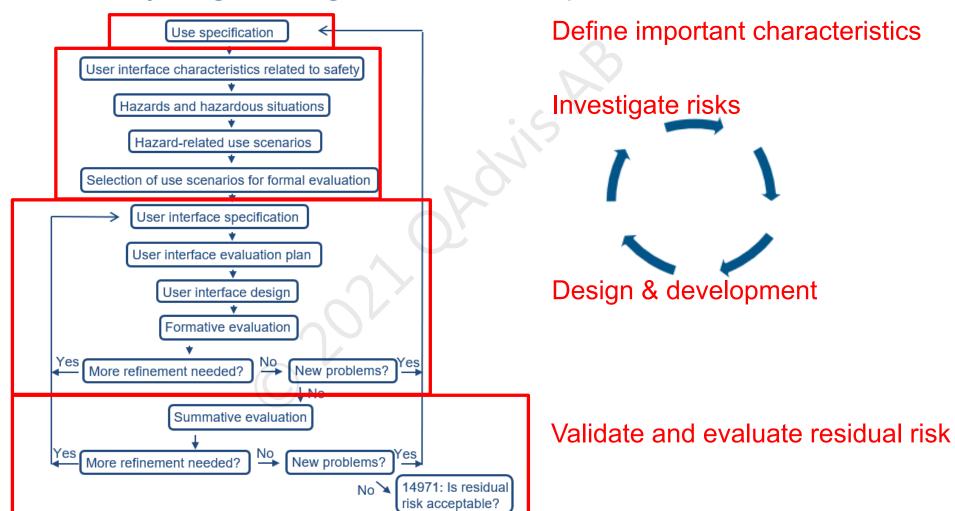




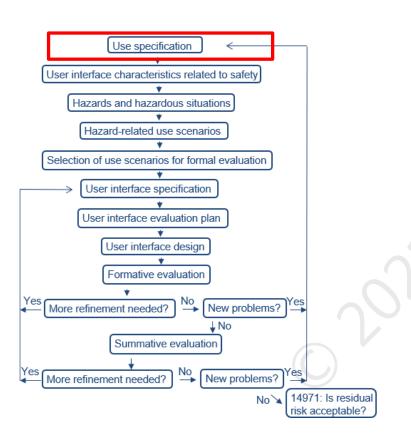




The Usability Engineering Process - Components

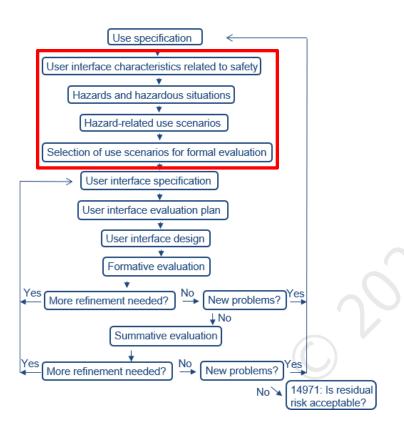


The Usability Engineering Process - Input



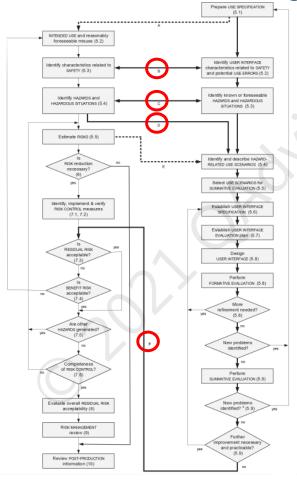
1. Use specification

The Usability Engineering Process - Risk



- 1. Use specification
- 2. User interface characteristics related to safety and potential use errors
- 3. Known or foreseeable hazards and hazardous situations
- 4. Hazard-related use scenarios + selection for summative testing

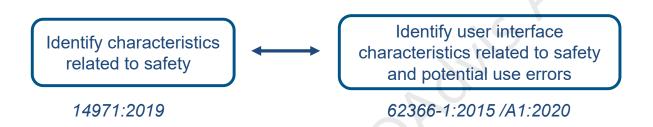
Usability - Closely Related to Risk Management Process



14971:2019

62366-1:2015/A2:2020

User Interface Characteristics Related to Safety and Potential Use Errors

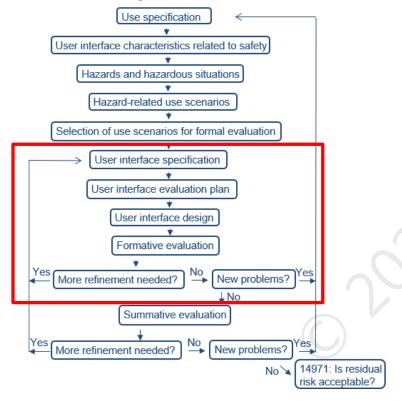


Input

- Annex A ISO/TR 24971:2020.
 Questions for identification of hazards and medical device characteristics related to safety. Includes usability-related aspects.
- Experience from previous products (customer complaints, incidents, literature)
- Task analysis a tool to identify potential use errors (IEC TR 62366-2:2016, 9.1)

The Usability Engineering Process – Design & Dovelopment

Development



- Use specification
 User interface characteristics related to safety and potential use errors
- 3. Known or foreseeable hazards and hazardous situations
- 4. Hazard-related use scenarios + selection for summative testing
- 5. User interface specification
- 6. User interface evaluation plan (formative and summative evaluations)
- 7. User interface design incl. formative evaluation

User interface evaluation plan Formative vs Summative Usability Testing

Formative usability testing

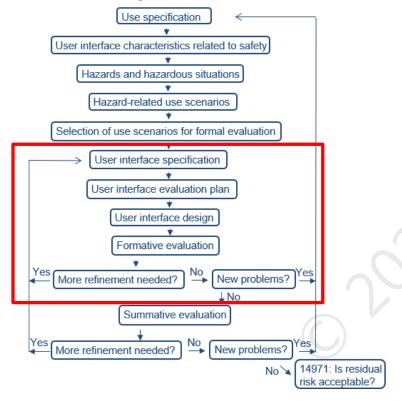
- Iteratively performed during product development
- Advisory testing using sketches, prototypes etc.
- Input to interface concepts and design (strengths, weaknesses, use errors)
- No formal acceptance criteria
- "Good usability engineering practice suggests conducting at least one formative evaluation ahead of a summative evaluation." IEC 62366-2:2016

Summative usability testing

- Performed at the end of product development
- Final product (or equivalent)
- Validation of the safe use of the user interface, including information for safety
- Formal acceptance criteria

The Usability Engineering Process – Design & Dovelopment

Development



- Use specification
 User interface characteristics related to safety and potential use errors
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User Interface Design and Implementation

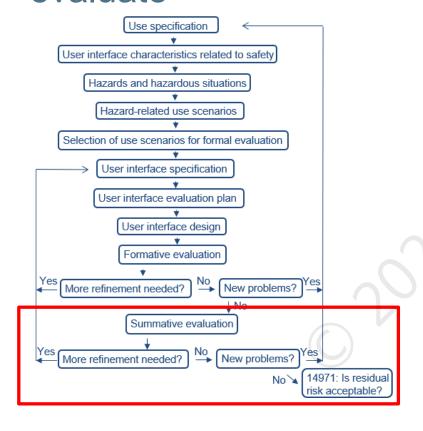


- Includes formative testing & iterative design and implementation
- Accompanying documentation
- Training materials (if training is necessary for the safe use of the device)
- Multidisciplinary team

Suggested competences (part 1, 5.8): users, engineers, user-interface specialists, cognitive psychologists, multimedia programmers, usability engineers, marketing and training personnel

Guidance on design and implementation of user interface is available in IEC 62366-2:2016, chapter 15

The Usability Engineering Process – validate and evaluate



1. Use specification User interface characteristics related to safety and potential use errors Known or foreseeable hazards and hazardous situations 4. Hazard-related use scenarios + selection for summative testing 5. User interface specification User interface evaluation plan (formative and summative evaluations) 7. User interface design incl. formative evaluation **Summative evaluation** 8.

Next steps



- Read the standard & guidance
- Focus on risks
- Further training
 January 18 2022, 4h online training
- Additional support https://www.qadvis.com/our-services/

www.qadvis.com



Your Regulatory Partner