

Welcome and Introduction

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Public Health Concern

- Nontuberculous mycobacteria (NTM) infections have been identified in patients who previously underwent cardiothoracic surgical procedures involving cardiopulmonary bypass (CPB)
- Epidemiological investigations and lab analyses link these NTM infections with exposure to heater-cooler devices (HCDs) used during CPB
- HCDs are non patient contacting devices
- The airborne route for intraoperative transmission of NTM is newly described and was not anticipated when HCDs were previously cleared





Broad Approach

- Multifaceted issue
 - Entire class of devices
 - Device design and cleaning and disinfection methods
 - Patient identification
 - Patients may not manifest symptoms for months to years after initial exposure
 - Continuity of patient care
 - Environmental factors
 - Operating room environment
 - Patient notification considerations





Meeting Discussion Topics

- Effectiveness of HCD cleaning and disinfection methods
- Premarket data and information needed to demonstrate validation of cleaning and disinfection of HCDs to support labeling and technical instructions
- Protective measures and risk mitigations to ensure patient safety during procedures where these devices are used
- Developing risk stratification schema to inform guidelines for notifying patients who may have already been exposed to NTM during prior cardiac surgeries



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Overview of Heater-Cooler Devices Nicole Milligan, BS

HCD Validation: Cleaning and Disinfection Elaine Mayhall, PhD

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Overview of Heater Cooler Devices (HCD)

Nicole Milligan, BS Biomedical Engineer Circulatory Support Devices Branch Division of Cardiovascular Devices Office of Device Evaluation Center for Devices and Radiological Health





Overview

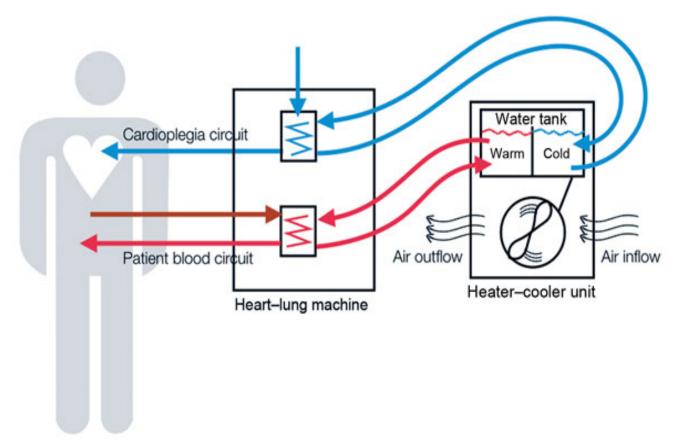
- Background on HCDs
- Device Design
- Non-tuberculous Mycobacteria
- Challenges



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General Description



Sommerstein R, Rüegg C, Kohler P, Bloemberg G, Kuster SP, Sax H. Transmission of *Mycobacterium chimaera* from heater-cooler units during cardiac surgery despite an ultraclean air ventilation system. Emerg Infect Dis. 2016 Jun 8





21 CFR 870.4250

Cardiopulmonary bypass temperature controller

Identification

A cardiopulmonary bypass temperature controller is a device used to control the temperature of the fluid entering and leaving a heat exchanger.





HCD Regulatory History

- HCD's are Class II devices
- FDA regulatory review
 - Performance
 - EMC
 - Software
 - Labeling (e.g., intended use)
- Cleaning/Disinfection Procedures
 - Water is not patient or blood contacting
 - Device is non-sterile
 - Risk to patient considered low
 - Quality Systems Regulation requires validated procedures₀



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		VELAVARA CC
Manufacturer	Model	Image
LivaNova/Sorin	Stockert 3T	
Maquet	HCU 30	
Cardioquip	MCH 1000(i)	
Terumo	TCM II	
Cincinnati Sub Zero	Hemotherm 400CE	11



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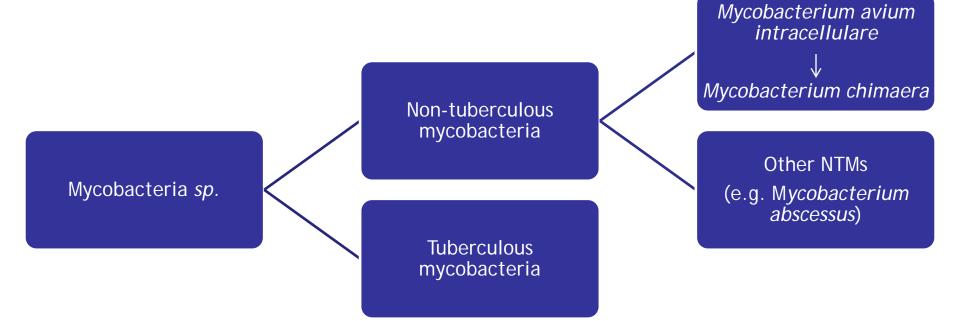
Design of HCDs

All of the HCDs have design aspects that agitate the water and have fans with the potential to disrupt the laminar air flow in the OR.





What is Non-Tuberculous Mycobacteria (NTM)?









- NTM wide spread in nature
- Isolated from natural water, tap water, soil, and water used in showers
- Surgical procedures (open chest) and more aggressive pathological profile than historically observed
- Spread likely through aerosolization





Device Related Challenges

- Water Tank and Other Circuit Component Access
- Connection to other circuit components
- Water Agitation within tanks
- Water/Air filters
- Fans/Vents
- Operating Temperature
- Future HCD Design Considerations

The committee will be asked to discuss device design features that could be improved for both current and future devices in order to mitigate aerosolization and minimize patient infection.¹⁵





Device Related Challenges: Water Tank and Other Circuit Component Access

- Some allow the end user access to the tank; others do not have practical access to the water tank.
- Tanks may have access but have coils which prevent adequate cleaning.
- Access to the HCD water tank and the ability to mechanically clean the tanks prior to disinfecting may be necessary to keep the tanks and circuits at an acceptable level of contamination.





Device Related Challenges: Connection to other circuit components

- HCD is connected to several components (oxygenator/cardioplegia heat exchanger, blanket)
- These external devices may contain reusable components that are not part of the heater cooler device disinfection process
- Reconnection of a disinfected (or new) HCD to the contaminated external reusable components would readily contaminate the HCD





Device Related Challenges: Water Agitation within tanks

- Agitation inside water tanks, created by mixing components, pumps, and the return water inlet, have the potential to produce air bubbles.
- These bubbles attract the hydrophobic NTM, and the amount of bubbles could influence the amount of aerosolized NTM within the tank.





Device Related Challenges: Water/Air filters

- Water/Air filters with appropriate pore sizes should remove NTM from tap water and capture aerosolized NTM.
- Not all currently used HCDs contain water and air filters that would be suitable or practical for this need.





Device Related Challenges: Fans/Vents

- Fans are found on all units and may facilitate the movement of aerosolized NTM
- Location of the vent and air exhaust may disturb airflow in the operating room





Device Related Challenges: HCD Operating Temperatures

Operating temperatures of the HCD are well suited for NTM survival.





Device Related Challenges: Future HCD Design Considerations

- Current HCD design features may contribute to biofilm formation and release of NTM into OR.
- New or modified HCD design features can be considered for reducing aerosolization.





Labeling Challenges

- Water recommendations
- Cleaning/Disinfection Procedures
- Regular Maintenance/Servicing

The committee will be asked to comment on FDA's safety communication and provide other suggestions for devices on the market that may help mitigate or minimize patient infections from aerosolized NTM 23





Labeling Challenges: Water recommendations

- Manufacturers' recommendations include tap water, distilled water, decalcified water, and filtered tap water.
- During disinfection, the tanks are rinsed with water prior to refilling for the next use.
- Sterile or filtered (with 0.22µm) water needs to be considered for filling (including ice making), refilling, topping-off and cleaning/rinsing of the HCDs to limit NTM from being introduced into the circuit.





Labeling Challenges: Cleaning/Disinfection Procedures

- Majority of HCDs recommend use of chemical agents to disinfect tank and circuits, while cleaning is conducted on the exterior of the device.
- In some cases, NTM is being found in HCDs, even after the recommended disinfection procedures have been followed.
- FDA recommends following the manufacturers' most current disinfection/cleaning instructions as deviations such as increased frequency could lead to degradation.





Labeling Challenges: Regular Maintenance/Servicing

- HCDs need regular preventative maintenance at specified intervals to be performed by the manufacturer or trained representatives.
- Future servicing programs and/or manuals should prioritize their schedules/procedures to mitigate device contamination.





Point Source Contamination Challenges: Manufacturing Line

- There may be one or many sources responsible for the introduction of NTM (e.g., tap water, ice machines, manufacturing line, etc.).
- The challenges with identifying source(s) include genotyping limitations, latency period, and traceability back to a specific HCD.





Environmental Challenges

- Aerosolization of NTM within HCD and into OR
- Air flow in OR
- OR Infection Control Prevention





Environmental Challenges: Aerosolization of NTM within HCD and into OR

- Tanks within the HCDs are not air or water sealed. Aerosolized NTM in the tanks may escape through unsealed openings into the casing of the HCD.
- Aerosolized NTM within the casing of the HCD can escape into the OR environment via vents, facilitated by fans.





Environmental Challenges: Air flow in OR

- The HCD is placed outside the sterile field, and the patient is under a protective laminar flow of air.
- When the protection provided by the laminar flow is disrupted, particles already suspended in the OR air may settle inside the open wound during surgeries.





Environmental Challenges: OR Infection Control Prevention

In the OR environment, proper air quality, air volume exchange, maintaining a positive pressure, proper air flow direction, and UV-C lighting may help reduce the transmission of airborne pathogens.



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HCD Validation: Cleaning and Disinfection

Elaine S. Mayhall, Ph.D. Scientific Reviewer Infection Control Devices Branch Division of Anesthesiology, General Hospital, Respiratory, Infection Control, and Dental Device Office of Device Evaluation Center for Devices and Radiological Health





Water Quality Standards

- EPA National Primary Drinking Water Regulations 40 CFR 141 National Primary Drinking Water Regulations
- FDA-recognized Standard ANSI/AAMI 13959:2014 Water for hemodialysis and related therapies

Note: Neither of these standards specify limits for NTM

The committee will be asked to discuss whether or not one of these standards or another standard for microbial water quality can be used as a surrogate when determining acceptable levels of NTM in the HCD circulation water to minimize/mitigate patient infection.





Water Quality Standards

EPA Primary Drinking Water Standard

 ≤ 500 bacterial colonies/ml Heterotrophic plate count (HPC)

ANSI/AAMI 13959:2014 Water for hemodialysis and related therapies

- <100 cfu/ml Total viable microbial counts in dialysis water
- Action level of 50 cfu/ml.





HCD Validation: Cleaning and Disinfection

Manufacturer recommended cleaning and disinfection processes and frequencies have been ineffective in preventing contamination of HCDs with NTM and biofilm formation.

The panel will be requested to discuss how manufacturers should challenge the device in a lab environment that would replicate real-world use.





Disinfection of Medical Devices

Device Type	Patient Contact	Disinfection/ Sterilization
Semi-critical	Mucous membranes or non-intact skin	Sterilization but high level disinfection is acceptable
Non-critical Instruments	Intact skin	Low or intermediate level disinfection
Non-critical Equipment surfaces	Indirect	Low level disinfection
HCD	No intended patient contact	Panel advice requested





Disinfection Endpoints

- High level disinfection:
 - 6-log (10⁶) reduction of a mixed suspension of vegetative organisms, such as *Pseudomonas aeruginosa*, *Staphylococcus aureus*, *Escherichia coli*, and representatives of the Klebsiella-Enterobacter group, and
 - 6-log (10⁶) reduction of an appropriate mycobacterium species
- Intermediate level disinfection:
 - 6-log (10⁶) reduction of the mixed suspension of vegetative organisms, such as *Pseudomonas aeruginosa*, *Staphylococcus aureus*, *Escherichia coli*, and representatives of the *Klebsiella*-Enterobacter group, and
 - 3-log (10³) reduction of an appropriate mycobacterium species





HCD Disinfection Validation Testing

- Potency testing of disinfectants
- Simulated use testing
- In use testing





Potency Testing

- EPA Registered antimicrobial/disinfectant
- Potency testing
 - Tuberculocidal Activity
 - Fungicidal Activity
 - Bactericidal Activity
 - Virucidal Activity





Simulated Use Testing

- Test devices Use of conditioned devices
- Organic challenge Simulate actual use conditions
- Test organisms Relevant waterborne test organisms, *Pseudomonas aeruginosa* and nontuberculous mycobacterium (NTM), for example, *Mycobacterium abscessus*, *M. fortuitum*, *M. mucogenicum*, *M. avium*, *M. chimaera*
- Inoculation At most difficult areas of the device for disinfectant to penetrate





Simulated Use Testing

• Challenge quantification – Before and after disinfection cycle

Recovery and Culturing

- Water samples
- Internal surfaces, including biofilm
- Treatment





Proposed HCD Disinfection Endpoints - Simulated Use Testing

3-log (10³) kill of an appropriate NTM (*M. abscesses, M. fortuitum,* or *M. mucogenicum*) species, and
 6-log (10⁶) kill of the vegetative bacteria (*P. aeruginosa*, etc.)

OR

6-log (10⁶) kill of an appropriate NTM (*M. abscesses, M. fortuitum,* or *M. mucogenicum*) species, and
 6-log (10⁶) kill (microbicidal) of the vegetative bacteria (*P. aeruginosa*, etc.)





Simulated Use Testing

The panel will be asked to discuss how manufacturer's should develop validated disinfection processes that properly challenge HCDs in a laboratory environment that would replicate real-world use and what endpoints would be appropriate to apply in simulated use testing for disinfection of HCD water pathways to demonstrate that acceptable levels of NTM in HCD circulation water are achieved and maintained.





In Use Testing

- Clinical setting
- Cleaning and disinfection process per label instructions
 and carried out by healthcare personnel
- Evaluate over extended period of time
- Worst case conditions for HCD use including periods of inactivity
- Water samples collected and tested for microbial levels
- Internal surface swab samples collected and tested for microbial load; presence of biofilm





Decontamination of heatercooler units

"Decontamination of heater-cooler units associated with contamination by atypical mycobacteria"

- MI Garvey, R Ashford, CW Bradley, CR Bradley, TA Martin, J Walker, and P Jumaa
- Journal of Hospital Infection, In Press

Three different HCD decontamination regimens were evaluated for reducing the total viable count (TVC) from >300 cfu/100 ml in the water of HCDs.





Garvey et al.

Regimen	Disinfectant	TVC Disinfection	TVC Weekly
1- Manufacturer's	Chlorine-based	>300 cfu/100 ml	>300 cfu/100 ml*
2- 2X	Chlorine-based	1 cfu/100 ml	1-300 cfu/100 ml*
3- 2x	Peracetic acid	0 cfu/100 ml	1-100 cfu/100 ml
4 - Regime 3 plus tubing change	Peracetic acid	0 cfu/100 ml	0 cfu/100 ml

* M. chimaera found

Conclusion: A decontamination cycle, including an initial replacement of internal tubing with weekly microbiological water samples is required to maintain the water quality within HCDs at an acceptable level.





Question to Panel

The committee will be asked to discuss whether monitoring or surveillance of the HCD water for NTM or bacterial contamination should be performed to determine that the water quality within the HCD is maintained at an acceptable level.





Other Bench Testing

Compatibility of disinfectant and disinfection process with HCD

- Material compatibility
- Device functionality
- Device specifications





Challenges

NTM are difficult to identify and the slow growing varieties require long grow-out times. Standards exist that set limits for microbial water quality, but do not specify limits for NTM.

- Can a standard that specifies microbial water quality be used as a surrogate when determining acceptable levels of NTM in the HCD water to minimize NTM growth and biofilm formation?
- Should the HCD water be monitored for NTM or bacterial contamination in the clinical setting?





Challenges (cont.)

HCDs have no intended patient contact but NTM found in HCD water can be aerosolized and ultimately transmitted into the OR environment to infect a patient's chest wound. However, these devices do not fit into the scheme used for determining the appropriate disinfection level.

- How should a manufacturer challenge the HCD to replicate real-world use and validate the disinfection process?
- What endpoints for disinfection should be used in simulated use testing to demonstrate the effectiveness of the cleaning/disinfection instructions?





HCD Validation: Cleaning and Disinfection

Thank you



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Multi-pronged FDA Investigative Process

Julia Marders, RN, MS Nurse Consultant Food & Drug Administration Center for Devices & Radiological Health June 2, 2016





Multi-pronged FDA Investigative Process

- Outreach
- Compliance
- Communications
- Medical Device Report Analysis
- Information Request Letters





Outreach

Ongoing collaboration with:

- CDC Division of Healthcare Quality Promotion
- States: Health Departments, Association of State/Territorial Health (ASTHO)
- International Public Health Agencies: England, Ireland, Germany, Netherlands, Switzerland, Denmark, etc.
- Experts: Joseph Falkinham Ph.D, Richard Wallace M.D., Hugo Sax M.D., Andrew Streifel M.S., Silvia Muñoz-Price M.D. Ph.D
- Professional Societies: Society for Healthcare Epidemiology of America (SHEA), Infectious Disease Society of America (IDSA)
- Veteran's Administration





Activities

- Hospital Outreach
 - Extensive follow-up with hospitals about Medical Device Reports
 - Hospital visits
 - Medical Product Safety Network (MedSun) survey
- CDC convened Healthcare Infection Control Practices Advisory Committee (HICPAC) presentation
- 50 states call
 - Heighten State awareness of NTM infections in cardiothoracic patients
 - Inform stakeholders of ongoing and upcoming FDA & CDC efforts
 - Provide recommendations and resources to aid in risk reduction





Compliance: Inspections and Actions

- Directed inspections at heater-cooler device manufacturers are under way
- Several inspections have been completed and resulted in actions including a Warning Letter and Import Alert
- Focus for inspections is ensuring that firms have strong quality system and reporting procedures in place



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FDA Communications

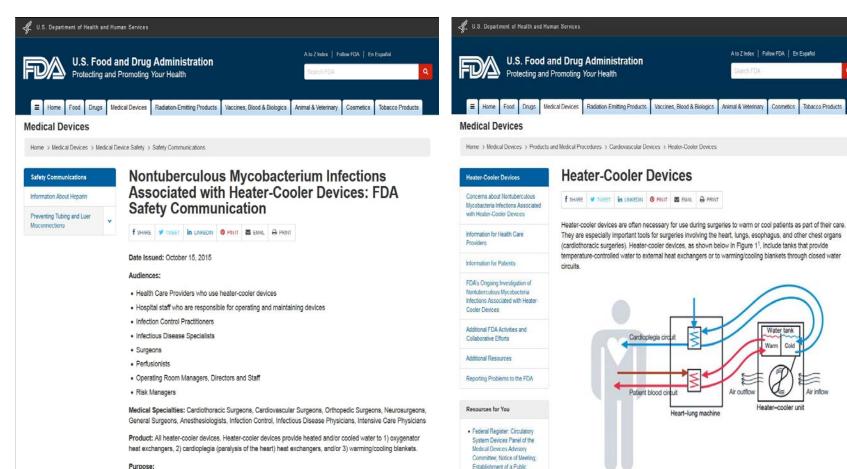
Safety Communication 10/15/15

http://www.fda.gov/MedicalDevices/Safety/AlertsandNotices/uc m466963.htm

The FDA wants to heighten awareness about infections associated with heater-cooler devices and steps health

Webpage 3/28/16

http://www.fda.gov/MedicalDevices/ProductsandMedicalProcedu res/CardiovascularDevices/Heater-CoolerDevices/default.htm



Docket Request for Comments



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Medical Device Report (MDR) Review Heater-Cooler MDRs Associated with Infection/Contamination

Kelly Bauer, RN, BSN Nurse Consultant

Division of Postmarket Surveillance

Office of Surveillance and Biometrics

Center for Devices and Radiological Health

June 2, 2016





MDR Review Outline and Information Request Letters

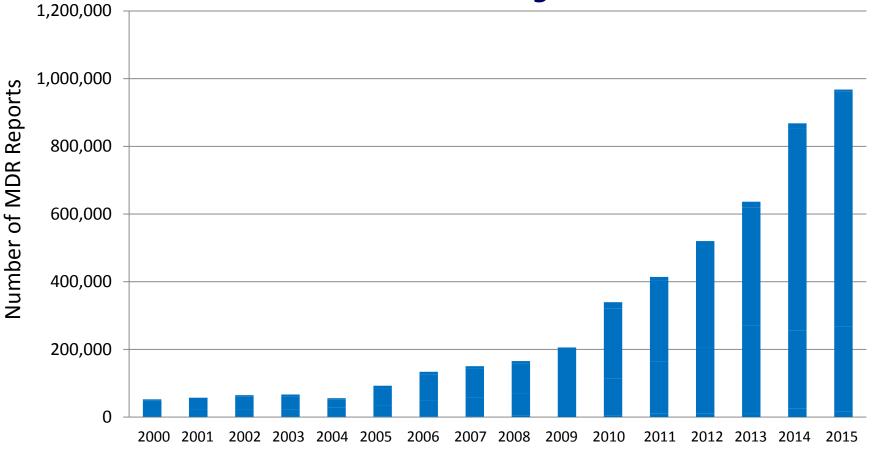
- Overview of MDR Reporting
- Limitations of MDRs
- MDR Review of patient infections and/or contamination of heater-cooler devices
- Information Request Letters





63

Number of Individual MDR Reports Received by Year







Events Reported to FDA

What Types of Events Must Be Reported to FDA?

- If device may have <u>caused or contributed</u> to a death or serious injury
- Certain malfunctions must also be reported by manufacturers/importers





"Caused or Contributed"

Death or serious injury was or may have been attributed to a medical device;

<u>or</u>

A medical device was or may have been a factor in a death or serious injury, including events resulting from:

- Failure
- Malfunction
- Improper or Inadequate design
- Manufacturing (problems)
- Labeling (problems)
- Use error





Events Reported to FDA

A reportable serious injury is defined as:

An injury or illness that is:

• Life-threatening

<u>or</u>

 Results in permanent impairment or damage to a body function or structure,

or

 Requires medical or surgical intervention to preclude permanent impairment or damage to a body function or structure





Events Reported to FDA

When is a Device Malfunction Reportable by the Manufacturer/Importer?

• The device fails to meet its performance specifications or otherwise perform as intended

<u>and</u>

• The device is <u>likely</u> to cause or contribute to a death or serious injury if the malfunction were to recur.





General MDR Reporting

REPORTER	WHAT TO REPORT	WHERE	WHEN
Manufacturer (Mfr) (Domestic and Foreign)	Deaths, Serious Injuries, Malfunction	FDA	Within 30 calendar days of becoming aware
	Deaths	FDA and Mfr	Within 10 working days of becoming aware
User Facility	Serious Injury	Mfr (FDA if unknown)	Within 10 working days of becoming aware
Importor	Deaths and Serious Injuries	FDA and Mfr	Within 30 calendar days of becoming aware
Importer	Malfunctions	Mfr	Within 30 calendar days of becoming aware
Voluntary (Patients, Clinicians)	Any type of event	FDA through MedWatch	Any time





Limitations of MDRs

- MDRs are just one of multiple tools used for post market surveillance
- MDR analysis results show a snapshot of the reports available at the time the data is pulled, and can change as new information is added and analyzed
- Under-reporting
 - Users unfamiliar with reporting
 - Fear of unintended consequences if they report
 - Confusion about HIPAA privacy and reporting
 - Malfunction or injury may not be clinically apparent





Limitations of MDRs

- Limitations of MDR regulation:
 - Certain device malfunctions may not meet MDR reporting requirements
 - Therefore, lack of MDRs ≠ lack of problems
- Insufficient/Inadequate information in report
 - Information not obtainable from end user
 - Devices not returned or made available for manufacturer evaluation
- Inability to Definitively Establish Causality
 - Cannot determine a definitive link between the use/malfunction of the device and the negative clinical adverse event or outcome.





MDR Review: Method CDRH MDR Database

MDR Search Criteria

- MDRs related to heater-cooler devices associated with patient infections and/or device contamination
- Date entered into MDR database between January 1, 2010 and February 29, 2016

Search Results: 180 MDRs

- 146 Manufacturer reports
- 33 User Facility (UF) reports
- 1 Voluntary patient report





User Facilities and Countries Mentioned in MDR Reports

Total of 55 User Facilities

US: 16 UF with 62 MDRs (34%)

Reports from hospitals in 10 US states

Outside of the US: 39 UF with 118 MDRs (66%)

Reports from hospitals in China, Denmark, France, Germany, Netherlands, Switzerland, and United Kingdom





MDRs by Manufacturer, Brand Name and User Facility (US vs. OUS)

MDRs by Manufacturer and UF					
Manufacturer and Brand	Total Number of MDRs	Number of User Facilities Represented in the MDRs			
Name		US	OUS	Total	
LivaNova/Sorin** Stockert 3T	160	15	35	50	
Maquet HCU20, HCU30 & HCU40	9	0	5*	5*	
Cincinnati Sub-Zero 333W and Hemotherm	3	2*	0	2*	
Terumo HX2	8	1*	0	1*	
Total	180	16 (2*)	39 (1*)	55 (3*)	

*Note that 3 UF reported devices from 2 different manufacturers

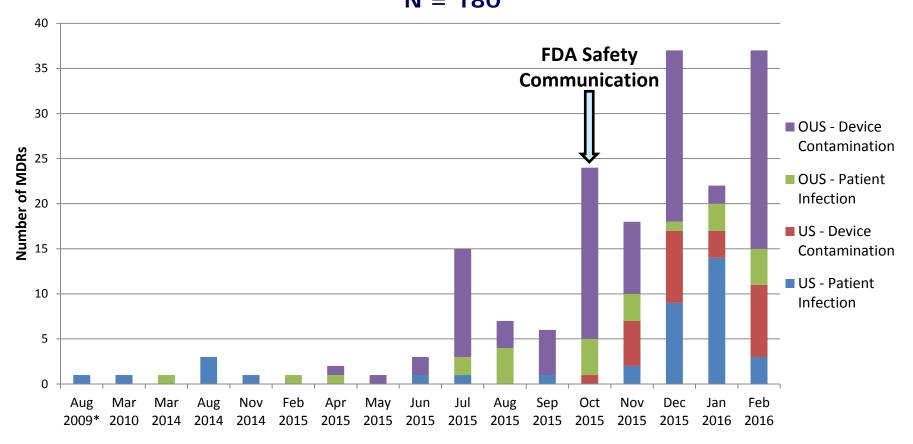
**LivaNova/Sorin has approximately 60% of the market share for this type of device





Heater-Cooler MDRs Associated with Infection/Contamination

by Date Entered into MDR Database by Month and Year N = 180







Patient and Device Counts Reported in MDRs

by Manufacturer and Brand Name

Manufacturer and Brand Name	Total Number of	Infected Patients ¹		Patient Deaths ²		Contaminated Devices ³	
	MDRs	US	OUS	US	OUS	US	ous
LivaNova/Sorin Stockert 3T	160	40+	21+	7+	5	33+	111+
Maquet HCU20, HCU30 & HCU40	9	0	0	0	0	0	9
Cincinnati Sub-Zero 333W and Hemotherm	3	1	0	0	0	6	0
Terumo HX2	8	4	0	2	0	0	0
Total	180	45+	21+	9+	5	39+	120+

Note that MDRs may include information on more than one patient and/or device.

¹Patient infection identifies the total number of patients reported in the MDRs as having an infection.

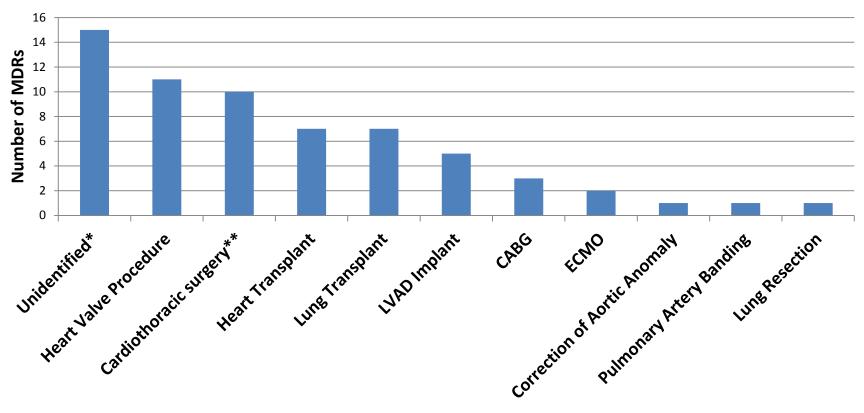
²Patient death identifies the number of patient deaths reported in the MDRs from the number of infected patients.

³Device contamination identifies the total number of devices as reported as being contaminated with or without known patient infection.





Patient Surgical Procedures Identified in the MDRs



Note that one MDR may include multiple procedures during the surgical intervention.

- * Surgical procedure was unknown or not identified
- **Unspecified Cardiac/Cardiothoracic Procedure, LVAD (Left Ventricular Assist Device Implant), CABG (Coronary Artery Bypass Grafts), ECMO (Extracorporeal Membrane Oxygenation)





Types of Patient Infections as Reported in the MDRs with TTEO

Diagnosis/Location of Infection	MDR counts	TTEO* Range (months)	TTEO* Mean (months)
Surgical wound infections	15	2.5 - 60	46
Unspecified	13	0 - 21	11
Endocarditis	12	2.5 - 51	26
Blood stream infection	11	0 - 60	19
Aortic root abscess	3	10 - 51	31
Empyema	2	4	4
Abdominal abscess	2	31	31
Disseminated infection	2	48	48
Driveline infection	2	31	31
Muscle flap	2	3	3
Mycotic aortic arch pseudoaneurysm	2	10	10
Myocutaneous thoracotomy flap infection	2	10	10
Pericardial abscess	2	31	31
Gastroenteritis	1	unk	unk
Mitral valve ring infection	1	9	9
Septic shock	1	0 - 39	20

*TTEO is Time to the Event Occurrence when reported in the MDR narrative text. Note that one MDR may contain multiple infection diagnoses.





Type of Organism by Manufacturer and Brand Name as Reported in the MDRs

Type of Organism	LivaNova/Sorin Stockert 3T	Cincinnati Sub-Zero 333W and Hemotherm	Maquet HCU20, HCU30 & HCU40	Terumo HX2
All Mycobacteria Total	121	0	5	10
M. abscessus	8	0	0	8
M. avium	5	0	0	0
M. avium intracellulare	1	0	0	2
M. chimaera	30	0	4	0
M. fortuitum	1	0	0	0
M. intracellulare	2	0	0	0
Mycobacterium (unspecified)	53	0	1	0
NTM/Atypical Mycobacteria	21	0	0	0
Bacteria (unidentified)	26	0	2	0
Coliform/HPC*	2	1	0	0
Cupriavidus pauculus	0	2	0	0
Legionella sp.	1	0	0	0
Pseudomona aeruginosa	1	0	2	0
Unidentified	11	0	0	0
Totals	162	3	9	10

Note that the counts do not equal the number of MDRs as there are cases where multiple organisms may be identified in one MDR.



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Information Request Letters

- Sent to all manufacturers, spec developers, etc.
- Focused on the following:
 - Adverse event reporting to FDA
 - Design aspects that encourage NTM proliferation/biofilm formation, aerosolization
 - Cleaning/disinfection validation
 - Labeling



Thank you

This concludes the FDA presentations.