



Device Classification

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*Reclassification of Urogynecologic Surgical Mesh Instrumentation
from Class I to Class II*

*Classification of Unclassified Gastroenterology
and Renal Devices*

What Is the Purpose of This Panel Meeting?

Part 1: Discuss the available scientific evidence regarding urogynecologic surgical mesh instrumentation, which is currently regulated as a Class I (exempt) device. You will be asked to recommend whether they should remain in Class I, or be reclassified to Class II or Class III.

Part 2: For three preamendments, unclassified device types, you will be asked to provide input to FDA on the classification for each one: Class III, Class II, or Class I.

What Are the Device Classes?

- Classified based on controls necessary:
 - Class I - General Controls
 - Class II - General and Special Controls
 - Class III - Premarket Approval
- A device should be placed in the lowest class whose level of control provides reasonable assurance of safety and effectiveness

What Are General Controls?

- General Controls Include:
 - Prohibition against adulterated or misbranded devices,
 - Good Manufacturing Practices (GMPs),
 - Registration of manufacturing facilities,
 - Listing of device types,
 - Recordkeeping, etc.

What Are Special Controls?

- Special Controls include:
 - Performance standards
 - Postmarket surveillance
 - Patient registries
 - Development and dissemination of guidelines, etc.

What Are Class I Devices?

- Devices for which general controls are sufficient to provide reasonable assurance of the safety and effectiveness

Class I devices typically require no FDA premarket review prior to being marketed

What Are Class I Devices?

- Devices which cannot be classified into Class III:
 - Because they are not life sustaining, life supporting, of substantial importance in preventing impairment of public health, and
 - Because they do not present a potential unreasonable risk of illness or injury
- Devices which cannot be classified into Class II:
 - Because insufficient information exists to establish special controls to provide a reasonable assurance of safety and effectiveness

What Are Some Examples of Class I Devices?

- General Surgical Instruments
- Manual Breast Pump
- Enema Kit



What Are Class II Devices?

- Cannot be classified into Class I:
 - because general controls are insufficient to provide reasonable assurance of the safety and effectiveness of such device, and
 - for which there is sufficient information to establish special controls to provide such assurance
- Class II devices typically require premarket notification to FDA (i.e., a 510(k)) prior to being marketed

What Are Some Examples of Class II Devices?

- Colonoscope
- Fetal Heart Monitor
- Gastrointestinal Feeding Tube
- Hemodialysis System



How Are Special Controls Used?

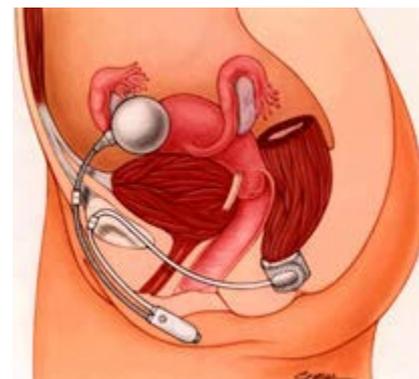
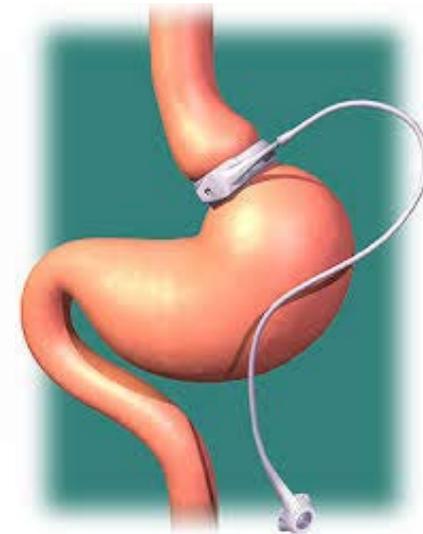
- As an example, cages were reclassified from Class III to Class II (special controls)
- FDA issued a special controls guidance to mitigate risks to health:
 - Biocompatibility testing
 - Material characterization
 - Mechanical testing
 - Sterility
 - Labeling (warnings, precautions, adverse effects, etc.)
- These special controls, in combination with the general controls, provide reasonable assurance of safety and effectiveness
- Companies must provide evidence in their 510(k) submissions of how the special controls were addressed ¹¹

What Are Class III Devices?

- Cannot be classified into Class II because:
 - insufficient information exists to determine that general and special controls are sufficient to provide reasonable assurance of the safety and effectiveness, and
 - The devices are:
 - life sustaining and/or life supporting, or
 - of substantial importance in preventing impairment of human health; or
 - presents potential unreasonable risk of illness or injury
- Class III devices typically require premarket approval (PMA) prior to being marketed

What Are Some Examples of Class III Devices?

- Extracorporeal Photophoresis System
- Obesity Treatment Device
- Implanted Urinary and Fecal Incontinence Device



What Is the Purpose of This Panel Meeting?

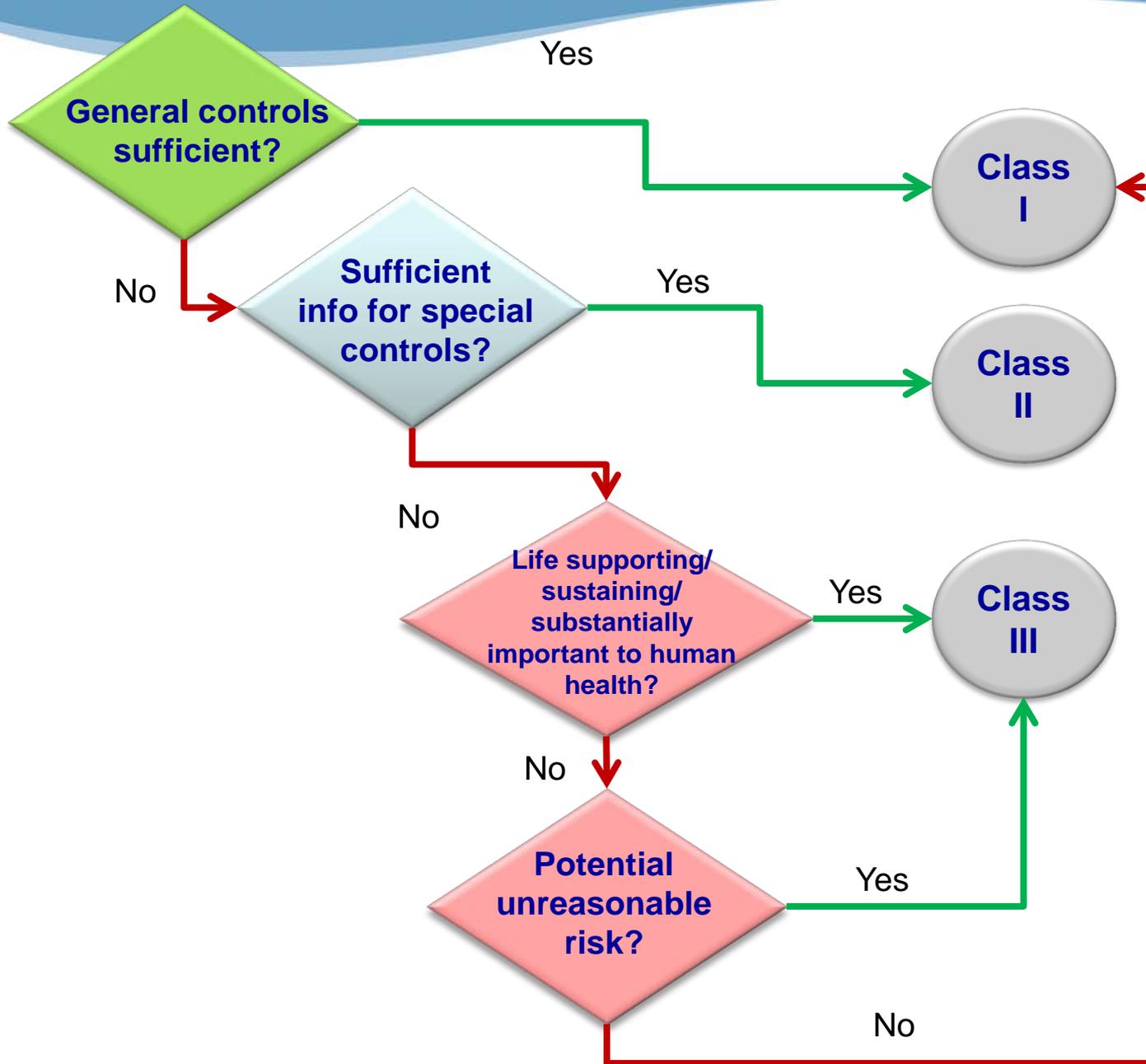
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Part 2: For three preamendments, unclassified device types, you will be asked to provide input to FDA on the classification for each one: Class III, Class II, or Class I.

What Is the Process?

Decision to start process is based on new information about the device, either on FDA's own initiative or upon the petition of an interested person. The Agency considers intended uses which have been reviewed by the Agency.

- Publish a proposed order announcing our proposed classification and seek public comment
 - Completed on May 1, 2014 followed by 90 day comment period
- Convene a panel meeting to discuss proposed classification
 - Completed today.
- Consider public comments and all available information, including panel recommendations, prior to issuing a final order



What We Need from the Panel

- Review and discuss available scientific evidence regarding safety and effectiveness of urogynecologic surgical mesh instrumentation.
- Input and recommendations should include:
 - Identify risks to health presented by the device.
 - Whether the device is life-supporting/life-sustaining, of substantial importance in preventing impairment to human health, or presents a potential unreasonable risk of illness or injury
 - Whether sufficient information exists to develop special controls
 - Identify special controls
 - Whether general controls alone are sufficient.

What Will Happen After This Panel Meeting?

- FDA will consider the available evidence, including the input of this panel and the public comments
- FDA will issue a final order identifying the appropriate class
 - If Class I, devices may continue to be marketed.
 - If Class II or Class III, existing devices will remain on the market, but must submit a 510(k) or PMA by a specified time to continue marketing.
 - If a 510(k) is not cleared or a PMA is not approved, devices will be considered misbranded and must be removed from distribution

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What Is a Preamendments Device?

A device of a type that was introduced into interstate commerce prior to May 28, 1976 (the enactment date of the Medical Device Amendments)

What Is an Unclassified Device?

A preamendments device that was not classified by the original classification panels; therefore, no classification regulation currently exists for this device type

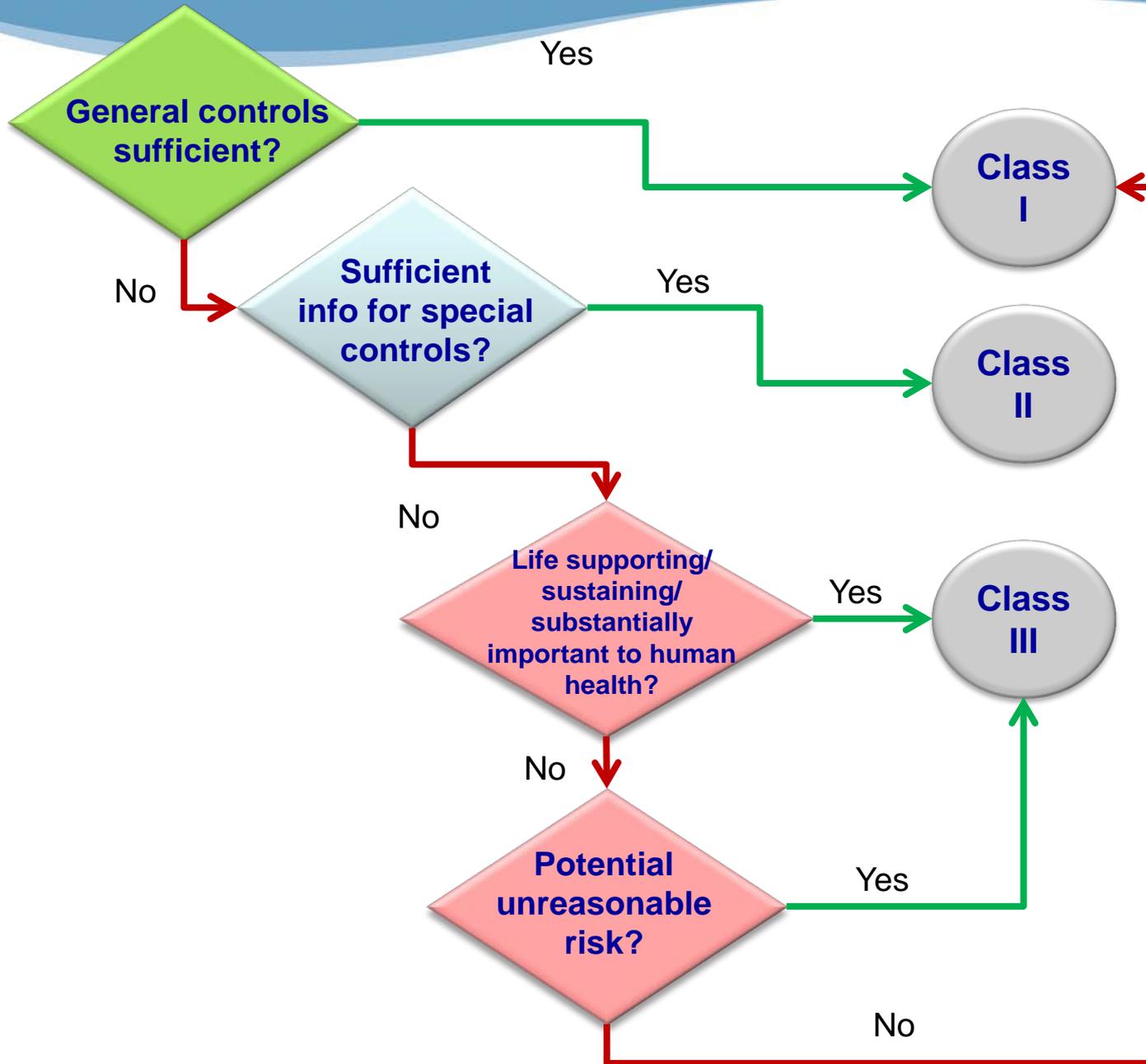
What Is the Classification Process for Preamendment, Unclassified Devices?

- Preamendment devices are classified after FDA has:
 - Received a recommendation from a device Classification Panel
 - Published the Panel's recommendation for comment, along with a proposed rule classifying the device; and
 - Published a final rule classifying the device

What We Need from the Panel

- Input on classification of the device types
 - Class III, Class II, or Class I

- Input should include:
 - An identification of the risks to health (if any) presented by each device type
 - Whether the device is life-supporting/life-sustaining, of substantial importance in preventing impairment to human health, or presents a potential unreasonable risk of illness or injury
 - Whether sufficient information exists to develop special controls
 - Identification of special controls
 - Whether general controls are sufficient for certain devices



What Will Happen After This Panel Meeting?

- FDA will consider the available evidence, including the input of this panel and the public comments
- FDA will issue a proposed rule, proposing classification of the device and seeking public comment on the proposal
- FDA will issue a final rule identifying the appropriate class
 - If Class I or Class II, devices may continue to be marketed
 - If Class III, will issue a separate call for PMAs
 - Existing devices will remain on the market until submission of a PMA by specified time to continue marketing
 - If PMA is not approved, devices will be considered misbranded and must be removed from distribution