

# **A Paradigm Shift in Driving Improvements**

**October 10<sup>th</sup>, 2017**

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# Introduction

- **Frank Meledandri** – 17 Years Experience
- **Current** – Manager, Quality Assurance Group – ZOLL LifeVest
- **ZOLL LifeVest** – The LifeVest wearable defibrillator is a treatment option for sudden cardiac arrest that offers patients advanced protection and monitoring as well as improved quality of life.



# Background

## **Business challenges:**

- Rapid innovation and growth driving increased variability in Manufacturing
- Processes, data collection, and improvement efforts focused on delivering regulatory artifacts. Not scalable from a resource, cost, and quality culture perspective
- Regulatory challenges increased cost and time of implementing improvements and systems

## **Improving speed, visibility, and control**

- Implementing technology to enables operational and manufacturing quality excellence
- Automate data collection, increase process and product knowledge, improve defect detection and responsiveness, error-proof and lean manufacturing process reducing non-value added inspections/verifications, etc
  - Paper reduction from 38,500 pages/week to 500 pages/week
- Modern, configurable COTS solution from established mature vendor in the industry

# A Paradigm Shift – Our CSV Story

## Go Live – *Excitement!!!*

And then came the change requests to optimize the process...and CSV!!!

### CSV Approach

- **HEAVILY SCRIPTED**, very conservative
- Initial system testing included in CSV

### Business Impact

- Long detailed “error prone” test scripts
- Large volumes of paper
- Time intensive multiple-sign off stages
- **CSV Team always blamed for extended time lines.**

### Culture Impact

- Rapid decline in overall morale surrounding system and CSV process
- Accelerated pace of change requests outpacing CSV resources
- Training becomes barrier - content/time
- High frustration levels
- Nobody wants to touch CSV, making training more difficult
- High uncertainty within CSV process / requirements
- **My CSV Engineer Quit!**

# A Paradigm Shift – The Awakening

Then we learned about the FDA – Industry CSV team’s “risk-based” approaches

## A Paradigm Shift...and a Life Saver!

- **Vendor Qualification**
- Analytics and Reporting
- **Unscripted / Ad-Hoc Testing**
- Automated CSV Risk Management

**CSV Risk-Based Recommendation Approach**  
Unscripted and Ad Hoc Testing

**Streamlined Risk-Based**  
**CSV**

Risk Level	Test Specifications	Evidence	Summary Info
High (Scripted Testing)	<ul style="list-style-type: none"> <li>Test plan</li> <li>Test objectives</li> <li>Test cases (step-by-step procedure)</li> <li>Expected results</li> <li>Approval of testing and quality team review.</li> </ul>	<ul style="list-style-type: none"> <li>Actual results with supplemental objective evidence (screenshots, logs, etc.)</li> <li>Pass/fail for test case</li> <li>Details regarding any failures found</li> </ul>	<ul style="list-style-type: none"> <li>Test summary report</li> <li>Actual results and pass/fail for each test case</li> <li>Issues found</li> <li>Conclusion statement</li> <li>Signature and date of testers</li> </ul>
Medium (Unscripted Testing)	<ul style="list-style-type: none"> <li>Test objectives</li> </ul>	<ul style="list-style-type: none"> <li>Pass/fail for each test objective</li> <li>Details regarding any failures found</li> </ul>	<ul style="list-style-type: none"> <li>Signature and date of testers</li> <li>Approval of testing team</li> <li>Conclusion statement</li> </ul>
Low (Ad Hoc Testing)	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>Details regarding any failures found</li> </ul>	<ul style="list-style-type: none"> <li>Test duration</li> <li>Signature and date of testers</li> <li>Conclusion statement</li> </ul>

**Table 1: Test Assurance Documentation**

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\*Presented by FDA-Industry CSV team at Siemens PLM-Medtronic June 28 2017 Intelligent Design Control event

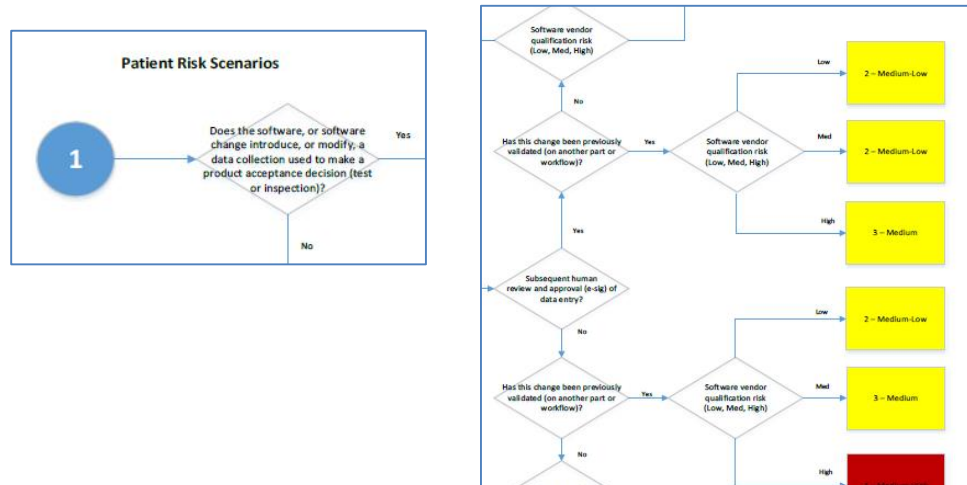
# A Paradigm Shift – The Change

How to ensure consistent selection of the correct Test Method?

➤ **Level One Questions**

- Software or Software Change based on Patient Risk
- Software or Software Change based on Regulatory Risk

➤ **Decision Tree Flow Chart Risk Based Algorithms**



➤ **Leveraging pilot CSV recommendations**

(Sample) Computer System Validation (CSV) Ad Hoc Test Report

CSV No. (if applicable) **1**

(Sample) Computer System Validation (CSV) Unscripted Test

CSV No. (if applicable) **1**

Test Overview – Capture at a high level the test activities executed. (add / remove rows as needed)	Deviation #	Tester Signature & Date
Ran report to retrieve document names for all reports in CSV Folder. Verified all reports were listed.	None	Sign – 4/12/2017
Added users in following roles: Document Owner, Document Approver (3 roles tester, independent review, test lead).	None	Sign – 4/12/2017
Added dummy test script for review and verified 3 roles were required as approvers.		
Searched for unique document ID number, document by creator, document by reviewer, date created, and verified	#227	Sign – 4/12/2017

# A Paradigm Shift – The Impact

Metric	Pre	Post	Impact
Process Validation Time	38 day Average	7 day Average	83% reduction
Service Defect Tracking (Camstar customization)	PQ = 22 runs, 35 days	PQ = 1 run, 3 days	91% reduction
Validation System Change Backlog (Camstar & Epicor)	90 changes in backlog (Extreme Frustration / low morale)	0 Changes in backlog!	<ul style="list-style-type: none"> <li>• High morale</li> <li>• More value from technology</li> <li>• Higher quality and productivity</li> </ul>
Camstar SU13 Upgrade Timeline	Feb '18	Nov '17	<ul style="list-style-type: none"> <li>• Utilize system improvement upgrades</li> </ul>
CSV 589 – Sublevel monitor work flow configuration update	18 days	3 days	<ul style="list-style-type: none"> <li>• 84% reduction.</li> </ul>
CSV 501 – ECG BOM Filter Improvements	Modeled Apr '17 Scheduled Oct '17 Due to resources and backlog	Aug '17 – Performed Validation 1 day Validation	<ul style="list-style-type: none"> <li>• More real time implementation of system improvements.</li> </ul>

# A Paradigm Shift – The Conclusion

- Be open to FDA collaboration
  - FDA and Industry collaboration is a game changer and creates great optimism for efficiency improvements!
- **Change the Culture**
  - Push back on historical misperceptions as you drive changes.
  - Do NOT let misperceptions hamper creating value with improvement and innovation!
  - Simpler, streamlined approaches will
    - Allow faster system improvements
    - Enable easier training to the process
    - Help recruit and onboard better talent
    - Increase Team Morale
    - Ensure consistent processes focused on doing what is best for patient and business

