



Preparing for the IVDR in a clinical lab

Dr. Isabel Dombrink 23. September 2022

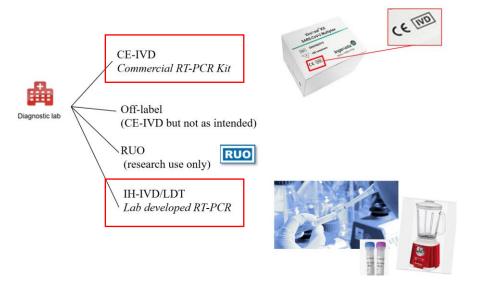
ESCCA 2022 - I.Dombrink (UKSH, Kiel, Germany)



Fact:

- Many laboratories are using IH-IVDs (often referred to as LDTs)
- But, how many labs are using IH-IVDs or how many IH-IVDs are used in labs?

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L 117/176	DE	Ameli		
	VERORDNUNG (EU) 2	Amtsblatt der Europäischen Uni	ion	
über	In-vitro-Diagnostika un	017/746 DES EUROPÄISCHEN Uni vom 5. April 2017 d zur Aufhebung der Richtlinie	RLAMENTS UND DES RATES 98/79/EG und des Beschlusses	5.5.201
		(Text von Bedeutung für den EWR) (RAT DER EUROPÄISCHEN UNION	98/79/EG und des Beschlusser	





BioMed Alliance

Main findings IVDR Questionnaire (Jul-Oct 2021)

Results of a survey

- on current IVD use
- preparedness for the IVDR of diagnostic labs of all disciplines





Biomedical Alliance in Europe

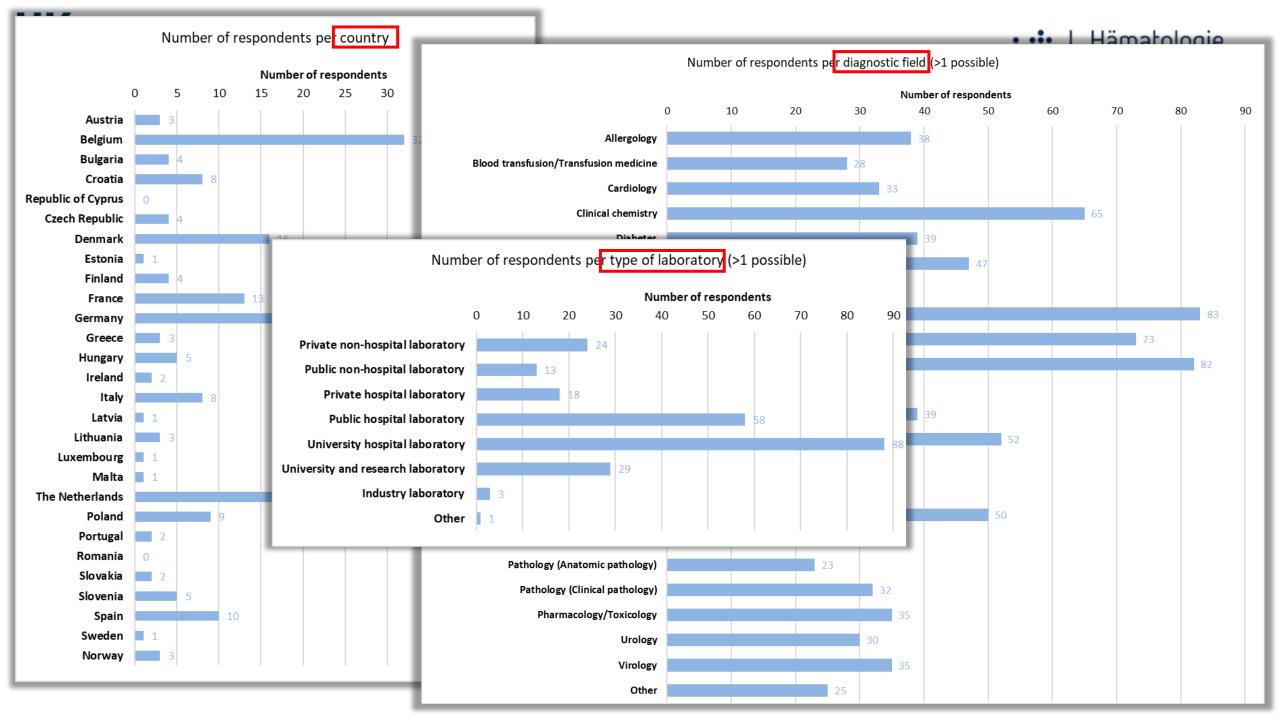


Main findings IVDR Questionnaire BioMed Alliance

December 2021

The Biomedical Alliance in Europe is the result of a unique initiative of 36 leading European medical societies together include more than 400,000 researchers and health professionals.

https://www.biomedeurope.org/images/news/2021/20211206_Findings_IVDR_Questionnaire_final.pdf



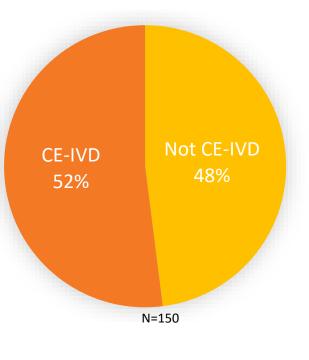


BioMed Alliance

Average percentage of assays used by respondents



- Not CE-IVD:
 - CE-IVD with minor modifications
 - Off-label CE-IVD
 - RUO
 - IH-IVD/ LDT







Biomedical Alliance in Europe



Main findings IVDR Questionnaire BioMed Alliance

December 2021

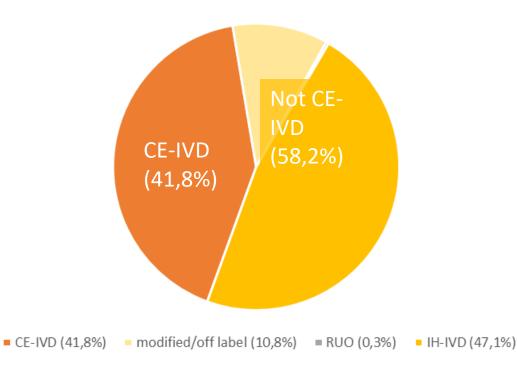
The Biomedical Alliance in Europe is the result of a unique initiative of 36 leading European medical societies together include more than 400,000 researchers and health professionals.

 $https://www.biomedeurope.org/images/news/2021/20211206_Findings_IVDR_Questionnaire_final.pdf$





Case study at a large university hospital laboratory Leuven Belgium



11.5 mio results/year



97.6% were generated with a CE-IVD method

922 different type of assay



CE IVD

➢ 58,2% Not CE-IVD



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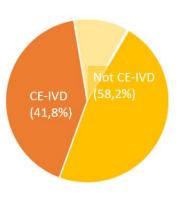
Fact:

- Many laboratories are using IH-IVDs (often referred to as LDTs)
- Why do labs use IH-IVDs?





Case study at a large university hospital laboratory



922 – Assays/ IVD total 537 – "Not CE-IVD" in use 271 – no CE-IVD available

Diverse reasons! 4 – IH-IVD cheaper

	Total	C	ore labo
	Tests (537)	Tests (n=146)	Res (n=14)
No CE-IVD test	271	20	
Modified CE-IVD (protocol, instrument)	63	35	
Off-label CE-IVD (other matrix)	37	29	
LDT in use before CE-IVD available	45		
LDT because CE-IVD does not meet analytical requirements®	54	5	
LDT allows multiple tests/ sample	3		
LDT is cheaper than CE-IVD	4		
RUO	3		
Flow cytometry	57	57	

*Analytical requirements: LDT has better precision and/ sufficiently validated (e.g., only tested in healthy indivi Conformité Européenne; IVD, *in vitro* diagnostic; LDT, la

Table 1: Reasons for not u	sing a CE-I		atologie or Kiel
	Total		
	Tests (537)		
No CE-IVD test	271		
Modified CE-IVD (protocol, instrument)	63		
Off-label CE-IVD (other	37	Mo	olecular tests
matrix)	57	Tests (n=97)	Results/y (n=43,171)
LDT in use before CE-IVD available	45	10 14	1.0% 33.2%
LDT because CE-IVD does not meet analytical	54		
requirements"		44	40.0%
LDT allows multiple tests/ sample	3	23	16.8%
LDT is cheaper than CE-IVD	4	3	2.0%
RUO	3	3	7.0%
Flow cytometry	57		

*Analytical requirements: LDT has bet uantitation, CE-IVD not sufficiently validated (e.g., only teste ch Use Only; y, year. Conformité Européenne; IVD, *in vitro*





Reason for the usage of "Not CE-IVDs"

Analytical performance
Performance of CE-IVD is not good enough*
Expertise/ Trust
Laboratory gains valuable experience with the IH-IVD during development/validation process (e.g. with extreme values, correct handling)
Transparency of validation data for CE-IVD is poor*
Handling not clear (bad instructions takes a lot time, trust)*
IH-IVDs are more robust
Disadvantage of CE-IVD: black box, laboratory needs to build up experience/ trust in handling, nearly a whole kit needed for a trustworthy verification
Practical reasons
Serial size not fitting
IH-IVD allows multiple tests/samples/matrices (Turnaround time)
Those reasons are not app

mproved by IVDR

general but led in some cases to the use of IH-IVDs





Cooperation with lab professionals and industry needed!!

- Developed by academia the needs of health care providers and patients are more likely to be met
- Ideally, development by academia will lead to transfer to the industrial sector
- If there is a superior IH-IVD -> everybody should have access to it after technology transfer

- unlikely to be the case for all diagnostic tests, particularly those which are rare and/or complex
- Best: complementary, co-existence of CE-IVD tests provided by the manufacturing sector and IH-IVDs developed and used by the academic diagnostic sector



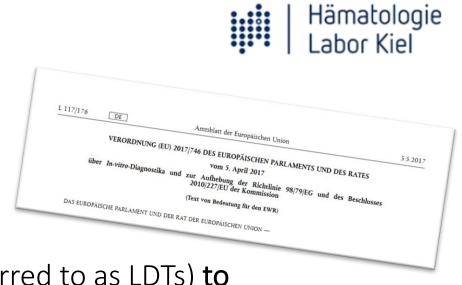
Dombrink, Lubbers et al., HemaSphere 2022

- Understand
- \rightarrow Why laboratories are using IH-IVDs
- Acknowledgement

→ The laboratory is the one that can judge the importance/ relevance of an IVD in the field/ need of IH-IVD



Fact:



 Many laboratories are using IH-IVDs (often referred to as LDTs) to guarantee the best medical care for their patients







Fact:

• IH-IVDs need to fulfill Article 5.5 of the IVDR and therefore also the general safety and performance requirements described in **Annex I.**

Questions – A practical approach:

- What is applicable by when?
- Where to start and which steps to go?

L 117/176	DE			
	VERORDNUNG (EU)	Amtsblatt der Europäischen Un	lion	
über	In-vitro-Diagnostika uno	17/746 DEC	RLAMENTS UND DES RATES 98/79/EG und des Beschlusses	5.5.201
DAS EUROPÄIS	CHE PARLAMENT UND DER R	(Text von Bedeutung für den EWR)	98/79/EG und des Beschlusses	





Where to start? How to obtain regulatory compliance?

Action 1: Appoint a dedicated team and stay informed

Action 2: Make an assay inventory

Action 3: Obtain regulatory compliance for IH-IVDs



The New EU Regulation on In Vitro Diagnostic Medical Devices: Implications and Preparatory Actions for Diagnostic Laboratories

Bart R. Lubbers¹, Anke Schilhabel², Christa M. Cobbaert³, David Gonzalez⁴, Isabel Dombrink², Monika Brüggemann², W. Marieke Bitter¹, Jacques J.M. van Dongen¹

Lubbers et al., HemaSphere 2021



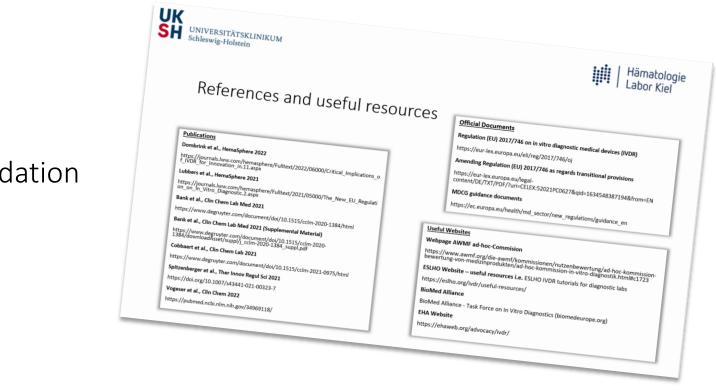


Dedicated Team

- Extra vacancies
- Main responsible person
- Support from within the lab
 - QMS, risk management, validation

Stay informed

- Good publications
- Video tutorial







Hematology lab in Kiel

• Leader of the Lab: Prof Monika Brüggemann



- Academic laboratory for specialized hematological diagnostics
 - patient care
 - reference diagnostics
 - translational research
- Accredited according to EN ISO15189 since 2011
- Predominant usage of IH-IVDs
 - (IVDR classification -> class c)

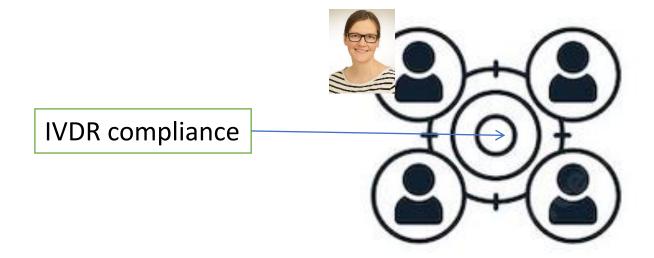






Main responsible Isabel Dombrink

- was hired in August 2020 Regulatory compliance with IVDR
- phD in Biology; worked as Regulatory Affairs Manager in a global pharmaceutical company

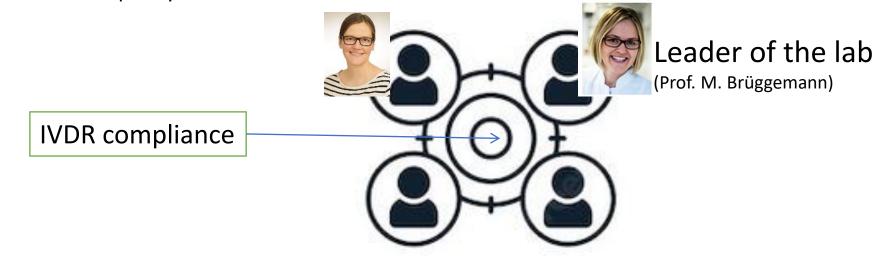






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IVD task forces:

Biomedical Alliance in Europe

European

- EHA IVD task force
- BioMed Alliance





• AWMF



-> Guidance documents

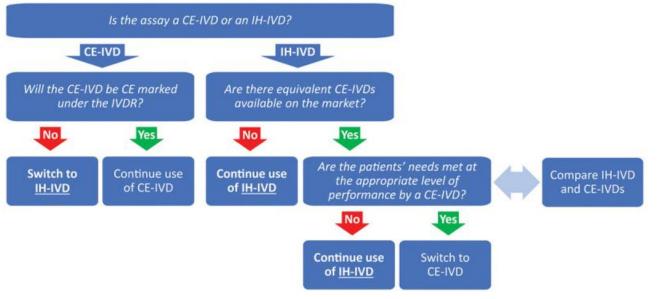
Why work in IVD task forces?

- to raise awareness for the IVDR and problems connected with IVDR
- to stay informed
- to offer help/guidance to labs
 - Symposia/ Webinars (ESLHO, AWMF, EFLM, Mabs)
 - Homepages (EHA)
 - Paper (AWMF/ BioMed Alliance)
 - Questionnaire (BioMed Alliance)





Action 2: Make an assay inventory



Adapted after Lubbers, Dombrink et al., HemaSphere 2021;5:e568

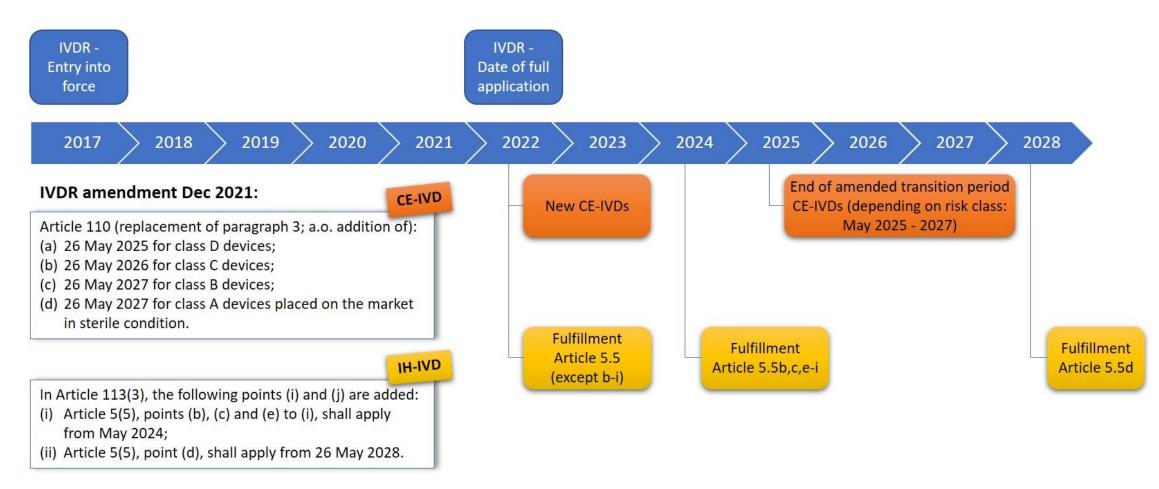
Understand the grey area!

- CE-IVDs used strictly according to the manufacturer's instructions for use (IFU);
- CE-IVDs with minor modifications;
- Off-label CE-IVDs;
- Research Use Only kits (RUOs);
- In-house devices (IH-IVDs)/LDTs.





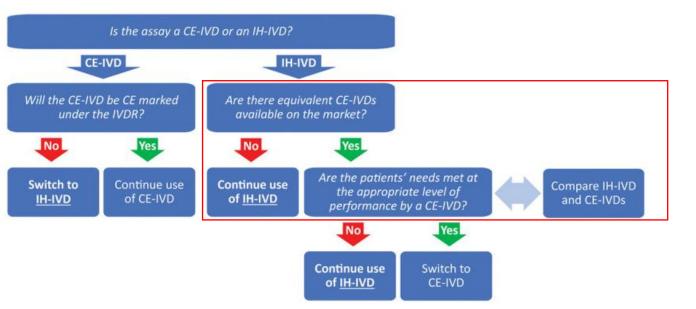
(Amended) IVDR implementation timeline







Action 2: Make an assay inventory



Adapted after Lubbers, Dombrink et al., HemaSphere 2021;5:e568

Extended transition timelines

May 2022

- Fulfillment Annex I (general safety and performance requirements)
- Not manufactured on an industrial scale
- Manufactured an used only within health institutions established in the Union

May 2024

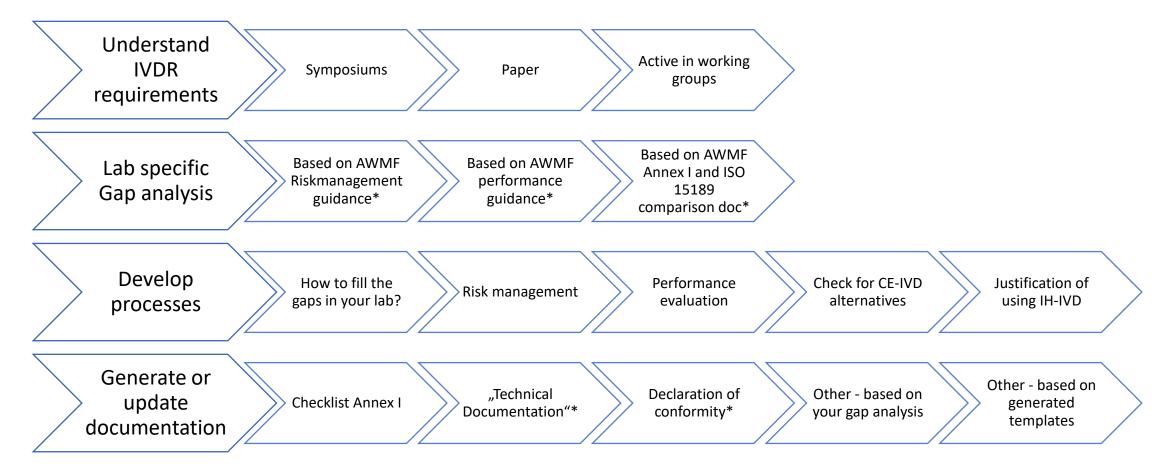
• Fulfillment Article 5.5 b,c; e-I

May 2028

• Fulfillment Article 5.5. d











Documents generated by AWMF

- Templates
 - "Technical Documentation"
 - Declaration of conformity (with Annex I)
- Guidance docs
 - IVDR compliant Risk management
 - IVDR compliant Performance evaluation
- Check lists
 - Compact IVDR check list
 - Annex I incl. comparison with ISO15189
- Performance evaluation
 - Software validation
 - Validation Virology/Microbiology
 - Validation chromatograph. mass spect. methods



- AWMF is a network of Scientific Medical Societies in Germany
- Combines now 180 scientific member societies and 3 associated societies from alle medical specialties.
- 2019 –> Ad-hoc Commission "In vitro Diagnostic"
 - Various **subgroups** with the goal to generate documents that help diagnostic labs implement the IVDR





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What needs to be done? How can you do it? Where to find additional information?

Not mandatory (!) but useful: ISO 22367:2020

- Medical laboratories Application of risk management to medical laboratories
 Annex XIII
- Performance Evaluation, Performance Studies and Post-Market Performance Follow-up





Documents generated by AWMF

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- Performance evaluation
 - Software validation
 - Validation Virology/Microbiology
 - Validation chromatograph. mass spect. methods

What is applicable for IH-IVDs? Interpretation help Further information 2nd tab comparison Annex I with ISO15189





Section	1	IVDR requirement	Comparable requirements in ISO 15189 (yes, no, partially (part.)) [6]	ISO 15189 requirement
GENERAL	REQUI	IREMENTS		
1.	be of they The the pers acc con	wices shall achieve the performance intended by their med. laboratory and shall designed and manufactured in such a way that, during normal conditions of use, ey are suitable for their intended purpose. ey shall be safe and effective and shall not compromise the clinical condition or e safety of patients, or the safety and health of users or, where applicable, other rsons, provided that any risks which may be associated with their use constitute ceptable risks when weighed against the benefits to the patient and are mpatible with a high level of protection of health and safety, taking into account e generally acknowledged state of the art.	part.	Comparable requirement in ISO 15189. However, the requirement in ISO15189 is lower than in the IVDR. ISO14971 and/or 22367 can be used as guidance. Keep in mind! ISO 15189 <-> Process IVDR <-> Product
2.		e requirement in this Annex to reduce risks as low as possible means the duction of risks as far as possible without adversely affecting the risk-benefit ratio.	no	This is not required in such detail by ISO 15189. Comparable requirements in 14971/22367 (recognised state of the art). It should be noted that according to the IVDR, the risk must be reduced not only to where it is acceptable, but as far as possible without negatively impacting the risk-benefit ratio. An acceptable level is sufficient according to 22367; 14971 states that management should determine what is acceptable.
f	to, t	e risk of incorrect identification of specimens and the risk of erroneous results due for example, confusing colour and/or numeric and/or character codings on ecimen receptacles, removable parts and/or accessories used with devices in der to perform the test or assay as intended; ESCCA_20	yes 22 - LDombrink (LIKSH - k	
g	the	e risks of any foreseeable interference with other devices.	N.A	The laboratory must check to see whether this requirement applies to the in-house IVD and should be implemented. If it is not applicable, justification must be provided

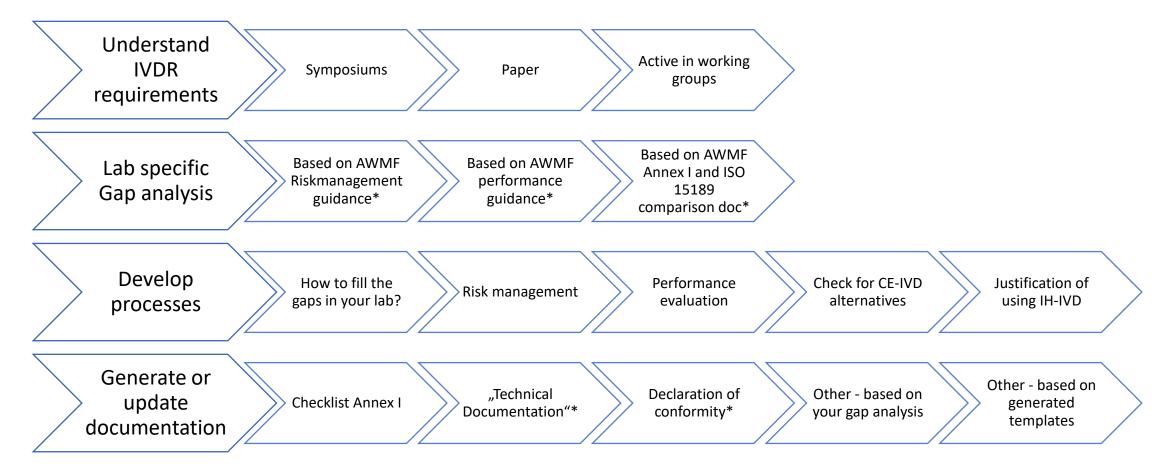




Section	IVDR requirement	Comparable requirements in ISO 15189 (yes, no, partially (part.)) [6]	
GENERAL	EQUIREMENTS		
1.	Devices shall achieve the performance intended by their med. laboratory and shall be designed and manufactured in such a way that, during normal conditions of use, they are suitable for their intended purpose. They shall be safe and effective and shall not compromise the clinical condition or the safety of patients, or the safety and health of users or, where applicable, other persons, provided that any risks which may be associated with their use constitute acceptable risks when weighed against the benefits to the patient and are compatible with a high level of protection of health and safety, taking into account the generally acknowledged state of the art.	part.	Comparable requirement in ISO 15189. However, the requirement in ISO15189 is lower than in the IVDR. ISO14971 and/or 22367 can be used as guidance. Keep in mind! ISO 15189 <-> Process IVDR <-> Product
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f	the risk of incorrect identification of specimens and the risk of erroneous results due to, for example, confusing colour and/or numeric and/or character codings on specimen receptacles, removable parts and/or accessories used with devices in order to perform the test or assay as intended; ESCCA.20	5.4.6 5.4.6	Comparable requirements in ISO 15189 ->5.4.6 Ubereinstimmung mit den aufgestellten Anforderungen ist. [→Anmerkung] Empfang der Probe Das Laborverfahren für den Empfang der Probe sicherstellen dare die ISO 15189 accreditation checkliste a) Prober ISO 15189 accreditation somsang zweifelt ISO 15189 accreditation somsang som auf Auftragsbearbeitung b) Vom Laboratorium entwickelte und dokumentierte Kriterien für die Annahme oder Zurückweisung von Proben werden angewendet. Spi Okyekn @rbio@m@bleijder Patienten- oder Proben-
g	the risks of any foreseeable interference with other devices.	N.A	identifizierung, durch Probeninstabilität aufgrund von and should be

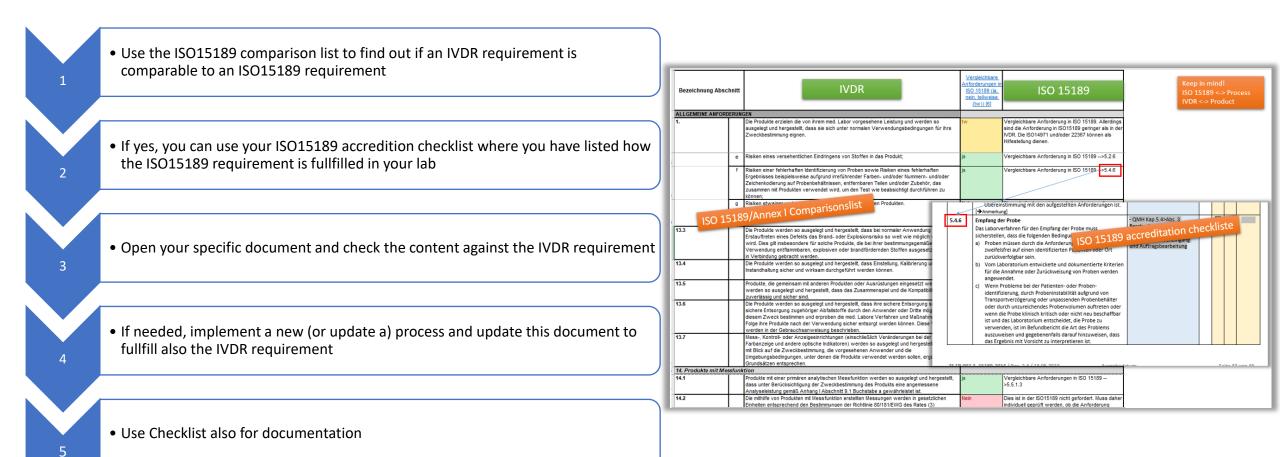
















Bezeichnung Abschnitt	Anforderung gemäß Anhang I, IVDR	A/NA	Angabe zur Nachweis- dokumentation	Ergänzende Kommentare	1 Art. 5 Abs. 5	Forderung	anwendbar ab	Umsetzung/Kommentar
LLGEMEINE A	Import Second State Die Produkte erzielen die von ihrem med. Labor vorgesehene Leistung und werden so ausgelegt und hergestellt, dass sie sich unter normalen Verwendungsbedingungen für ihre Zweckbestimmung eignen. Sie sind sicher und wirksam und gefährden weder den klinischen Zustand und die Sicherheit der Patienten noch die Sicherheit und die Gesundheit der Anwender oder gegebenenfalls Dritter, wobei etwaige Risiken im Zusammenhang mit ihrer Anwendung Demessen am Nutzen für den Datienten vertrether und mit einem behan Maß an	A	QMH 5.05 QMH 4.01	Im QMH 4.01 wird unter "Qualitäts anerkannte Stand der Technik ge	2 3 letzter Satz	Mit Ausnahme der einschlägigen grundlegenden Sicherheits- und Leistungsanforderungen gemäß Anhang I gelten die Anforderungen dieser Verordnung nicht für Produkte, die ausschließlich innerhalb von in der Union ansässigen Gesundheitseinrichtungen hergestellt und verwendet werden, sofern alle folgenden Bedingungen erfüllt sind: Dieser Absatz gilt nicht für Produkte, die im industriellen Maßstab hergestellt werden	2022 2022	Dieser erste Satz des Artikel 5 Abs. 5 besch IVDs anwendbar ist, sondern lediglich die a Zusätzlich müssen die Anforderungen aus A Excelliste zeigt detailliert, wie der Anhang I Die im HLK verwendeten IH-IVD werden ni
	Compliance with A	n	nex l		4 -	Compliance with	Art	icle 5.5
	Die med. Labore legen ein Risikomanagementsystem fest, setzen dieses um, dokumentieren es und schreiben es fort.		QMH 4.14	Zusätzlich wird die Umsetzung de Risikomanagementplan enthält be	5	Das Labor der Gesundheitseinrichtung entspricht der Norm EN ISO 15189 oder ggf. nationalen Vorschriften einschließlich nationaler		Das HLK ist seit 2011 nach Norm EN ISO 1 eingesetzten Methoden sind der aktueller
a	Die med. Labore legen ein Risikomanagementsystem fest, setzen dieses um, dokumentieren		QMH 4.14 QMH 4.14 VA A-010	Zusätzlich wird die Umsetzung de	5 c	Das Labor der Gesundheitseinrichtung entspricht der Norm EN ISO 15189 oder	2024	Das HLK ist seit 2011 nach Norm EN ISO 1 eingesetzten Methoden sind der aktuellen entnehmen. Erst ab 2028 anwendbar! Für jedes im HLK eingesetzten IH-IVD exist rechtfertigt. Die jeweiligen Begründungen finden. Bei der Erstellung der Begründung wird fol 1.Gibt es ein "gleichartiges" Produkt auf der





References and useful resources

Publications

Dombrink et al., HemaSphere 2022

https://journals.lww.com/hemasphere/Fulltext/2022/06000/Critical_Implications_of_IVDR_for_In novation_in.11.aspx

Vogeser et al., Clin Chem 2022

https://pubmed.ncbi.nlm.nih.gov/34969118/

Lubbers et al., HemaSphere 2021

https://journals.lww.com/hemasphere/Fulltext/2021/05000/The_New_EU_Regulation_on_In_Vitr o_Diagnostic.2.aspx

Bank et al., Clin Chem Lab Med 2021

https://www.degruyter.com/document/doi/10.1515/cclm-2020-1384/html

Bank et al., Clin Chem Lab Med 2021 (Supplemental Material)

https://www.degruyter.com/document/doi/10.1515/cclm-2020-1384/downloadAsset/suppl/j_cclm-2020-1384_suppl.pdf

Cobbaert et al., Clin Chem Lab 2021

https://www.degruyter.com/document/doi/10.1515/cclm-2021-0975/html

Spitzenberger et al., Ther Innov Regul Sci 2021

https://doi.org/10.1007/s43441-021-00323-7

Vermeersch et al., Clin Chem Lab Med 2020

https://www.degruyter.com/document/doi/10.1515/cclm-2020-0804/html

Official Documents

Regulation (EU) 2017/746 on in vitro diagnostic medical devices (IVDR)

https://eur-lex.europa.eu/eli/reg/2017/746/oj

Amending Regulation (EU) 2017/746 as regards transitional provisions

https://eur-lex.europa.eu/legalcontent/DE/TXT/PDF/?uri=CELEX:52021PC0627&qid=1634548387194&from=EN

MDCG guidance documents

https://ec.europa.eu/health/md_sector/new_regulations/guidance_en

Useful Websites

Webpage AWMF ad-hoc-Commision

https://www.awmf.org/die-awmf/kommissionen/nutzenbewertung/ad-hoc-kommissionbewertung-von-medizinprodukten/ad-hoc-kommission-in-vitro-diagnostik.html#c1723

ESLHO Website - useful resources i.e. ESLHO IVDR tutorials for diagnostic labs

https://eslho.org/ivdr/useful-resources/

BioMed Alliance

BioMed Alliance - Task Force on In Vitro Diagnostics (biomedeurope.org)

EHA Website

https://ehaweb.org/advocacy/ivdr/





Thank you!

Questions?





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