

FDA's Digital Health Center of Excellence: An opportunity to collaborate

Bakul Patel

Director, CDRH Digital Health Center of Excellence

Center for Devices & Radiological Health (CDRH), US FDA

www.fda.gov/digitalhealth



Patients are at the Heart of What We Do



CDRH Vision

Patients in the U.S. have access to high-quality, safe, and effective medical devices of public health importance first in the world

Digital Health Technology



"A system that uses computing platforms, connectivity, software, and sensors for healthcare and related uses"* Used as a medical product

Incorporated into a medical product (include a pharmacologic product)

Used to develop a medical product

Used to study a medical product

Used as a companion or adjunct to a medical product, including diagnostics and therapeutics.

*Definition from FDA-NIH BEST Glossary. Available at https://www.ncbi.nlm.nih.gov/books/NBK338448/



Digital Health Technologies (DHTs)



www.fda.gov/digitalhealth

DHTs can be used in a variety of ways when evaluating medical products



Remote data collection



Clinical investigation enrichment strategies



Electronic informed consent



Fostering Responsible Innovation

Launched in 2020 FDA's Digital Health Center of Excellence

- Part of the planned evolution of the digital health program
- Aligning strategy with implementation
- Driving synergy for digital health efforts
- Preparing FDA for the digital health future



CDRH Digital Health Center of Excellence



Empowering All to Advance Healthcare



DHCoE Goals and Objectives



In support of the DHCoE mission and vision, the below three overarching goals illustrate the DHCoE's desired achievements for the next three years. Under each goal are measurable objectives that the DHCoE plans to reach in pursuit of the three goals.

Goal 1: Foster digital healthfocused collaboration and coordination within and beyond FDA

Objective 1: Forge new and fortify existing external partnerships that support the DHCoE's mission and vision

Objective 2: Work with other FDA Centers and Offices to align and integrate digital health work **Goal 2:** Promote awareness, transparency, and consistent application of digital health regulatory policies within and beyond FDA

Objective 1: Equip FDA staff with the skills, knowledge, and tools needed to consistently identify and apply digital health regulatory policies

Objective 2: Provide external stakeholders with information that introduces FDA's digital health processes, policies, and communication channels **Goal 3:** Pioneer the development and enhancement of digital health regulatory paradigms that continue to uphold FDA standards for safety and efficacy

Objective 1: Clarify existing regulations and develop new policies, tools, and review approaches

Objective 2: Work with international regulatory bodies to develop and streamline digital health regulatory paradigms



DHCoE: What We Do

External to FDA Partner • Coordinate • Voice

- ✓ Provide clarity on regulation
- Advance international harmonization on device regulatory policy
- ✓ Facilitate and build strategic partnerships
- ✓ Communicate FDA research interests
- ✓ Advance digital health device international standards

FDA - Wide Support-Align-Promote-Amplify

- Provide DH expertise across the Agency
- Offer training opportunities for FDA staff
- ✓ Disseminate shared resources
- ✓ Foster collaboration across FDA in common interest areas
- ✓ Facilitate synergies in regulatory science research in DH



Medical Device Focus Build • Coordinate

- Set/lead strategic direction and launch initiatives in DH
- ✓ Establish and promote best practices
- Enable efficient, transparent, and predictable product review with consistent evaluation quality
- Build new capacity to oversee and leverage DH technologies including shared resources
- Coordinate the development of cross cutting DH policies

DHCoE: Coordinating Operations



Digital HealthAdvisory Board

Senior leaders from FDA centers advising the DHCoE to identify and drive coordination on topic areas of work of common interest

Subcommittees

Reporting to the Advisory Board, subcomittees are charged to coordinate efforts on digital health topic areas affecting submissions to FDA

Current topics identified:

- AI/ML
- Digital Health technology



Training and Education ★

Forums bringing speakers and though leaders to FDA.

Digital Health **†** Steering Committee

CDRH level steering committee estbliahsed in 2015 to consistently apply policies to novel medical device submissions related to digital health technologies including software and identify policy development needs.

Program Directors 📌 Forum

Forum that brings program directors representing efforts within CDRH to stay coordinated and drive synergy withing CDRH on digital health including cybersecurity, advanced manufacturing and patient science.



Digital Health Collaborations

Collaboration efforts focus on digital health technology, artificial intelligence / machine learning, health equity, measurement, and real-world evidence

FDA's Centers of Excellence in Regulatory Science and Innovation



CERSI's are collaborations between FDA and academic institutions to advance regulatory science through innovative research, training, and scientific exchanges.



Collaborative Communities are continuing forums in which privateand public-sector members, which can include the FDA, work together on medical device challenges to achieve common objectives and outcomes



Other Digital Health Standards Activities

The DHCoE is also focusing on the following standards work:



Develop a formal DHCoE standards engagement strategy strengthening our partnership with the Standards and Conformity assessment program (S-CAP)



Develop better digital health tools for FDA reviewers



Work to ensure digital health standards have regulatory utility



DHCoE Standards Partnerships



We strive to be as innovative with our approach to digital health standards efforts as the digital health devices being dreamed up for tomorrow

- Partner with other Federal Agencies
- Ensure different parts work together efficiently



Good Machine Learning Practice (GMLP)

- Standards Development:
 - IEEE AI Medical Device Working Group P2801
 - ISO/IEC SubCommittee on AI 42 (ISO/ IEC JTC 1/SC 42)
 - AAMI/ BSI Initiative on AI in Medical Technology
- Collaborative Communities:
 - Xavier AI World Consortium Collaborative Community
 - Collaborative Community on Ophthalmic Imaging
 - Pathology Innovation Collaborative Community
- Other Collaborations:
 - IMDRF AI Medical Devices WG



Xavier Al World Consortium Collaborative Community



Collaborative Community on Ophthalmic Imaging

Pathology Innovation Collaborative Community

Pathology Innovation Collaborative Community Plcc



Good Machine Learning Practice Principles

U.S. FOOD & DRUG

Health Santé Canada Canada

1 Medicines & Healthcare products **Regulatory Agency**

We envision these guiding principles may be used to:

- Adopt good practices that have been proven in other sectors;
- Tailor practices from other sectors so they are applicable to medical technology and the health care sector; and
- Create new practices specific for medical technology and the health care sector.

Good Machine Learning Practice for Medical Device Development: Guiding Principles	
Multi-Disciplinary Expertise are Leveraged Throughout the Total Product Life Cycle	Good Software Engineering and Security Practices are Implemented
Clinical Study Participants and Data Sets are Representative of the Intended Population	Training Data Sets are Independent of Test Sets
Selected Reference Datasets are Based Upon Best Available Methods	Model Design is Tailored to the Available Data and Reflects the Intended Use of the Device
Focus is Placed on the Performance of the Human-Al Team	Testing Demonstrates Device Performance during Clinically Relevant Conditions
Users are Provided Clear, Essential Information	Deployed Models are Monitored for Performance and Re-training Risks are Managed

https://www.fda.gov/medical-devices/software-medical-device-samd/good-machine-learning-practice-medical-device-development-quiding-principles



Patient-Centered Approach Incorporating Transparency to Users

AI/ML-enabled devices have unique considerations that necessitate a proactive patient-centered approach:

- that takes into account issues including usability, equity, trust, and accountability
- that promotes transparency to all users and to patients more broadly

Patient Engagement Advisory Committee (PEAC) Meeting held Oct 2020

Workshop on Transparency of AIMLenabled devices held Oct 2021





How Can I Collaborate with the DHCoE?

CERSIs

FDA's Center of Excellence in Regulatory Science and Innovation

- Collaborations between FDA and academic institutions through innovative research, training, and scientific exchanges
- Visit website for more information



Collaborative Communities

- Continuing forums in which private- and public-sector members work together on medical device challenges
- Can invite CDRH to participate
- Visit <u>website</u> for more information
- Email questions to CDRHCollabCommunities@fda.hhs.gov

FDA Digital Health Inbox

- Help navigating the FDA's current policies on digital health products and providing informal feedback
- Visit website for more information
- Email questions to digitalhealth@fda.hhs.gov

FDA Network of Digital Health Experts

- A pool of vetted experts who share knowledge and experience regarding digital health issues with FDA staff on an as-needed basis
 - Visit <u>website</u> for more information on participating

www.fda.gov/digitalhealth

NoDEx

Highlights



FDA's Digital Health Center of Excellence •Fostering responsible and high-quality digital health innovation **Ongoing Clarity** •12 Digital health guidance documents published since FY 2018 **Select Accomplishments** Notable authorizations for: 2500+ **80+** <70 26 Substance use disorder Access to experts Inquiries FDA Days to decision for Public Opioid use disorder Network of Digital addressed 510(k) with DH content Documents **Diabetes management** since FY18 Health Experts Internationally Harmonized framework for Software as a Medical Device (SaMD) •Foundational vocabulary (2013) •Risk Framework (2014) •Regulatory QMS (2015) SaMD Clinical Evaluation **Pre-Certification Program** • Move from episodic oversight to continuous oversight that enables trust in the organization using a pragmatic check-in with real-world performance data AI/ML •AI/ML-SaMD Discussion Paper and participation in AI/ML-related Collaborative Community (2019) • Public Workshop and PEAC meeting (2020) •AI/ML Plan of Action (2021) • Published list of currently marketed AI/ML-enabled medical devices (2021)

www.fda.gov/digitalhealth