

Mastering the Regulatory Landscape for AI/ML-Enabled SaMD

Gain a Competitive Edge with Confidence in Your AI/ML-Enabled Medical Technology



Cindy Pelou
APACMed Representative
Host



Andrew Wu
VP of Medical Software,
GM of APAC Office
Rook Quality Systems



Paul Chua
Cybersecurity Officer,
Greater Asia
BD



Manan Hathi
Sr. Manager, Regulatory Affairs,
Digital Health Policy
Stryker



Victor Tan
RAQA Manager, APAC
Indirect Markets
Intuitive Surgical



Tuesday, 4 June 2024



0900-1000 SGT

Register for the webinar now

WHO WE ARE

The Asia Pacific Medical Technology Association (APACMed) represents **manufacturers and suppliers of medical equipment, devices and in-vitro diagnostics, industry associations and other key stakeholders** associated with the medical technology industry in Asia Pacific.

OUR OBJECTIVE

- As a trade association, our mission is to **improve the standards of care for patients** through innovative collaborations among stakeholders to jointly shape the future of healthcare in Asia Pacific.
- Build and support a **strong regulatory workforce** for MedTech industry and regulators and **drive capacity building initiatives** in partnership with various stakeholders.

360

member
companies

60

corporate
members

150

Startups

HEADQUARTERS: SINGAPORE
COUNTRY OFFICES: INDIA & CHINA

FUNCTIONAL COMMITTEES

**Regulatory
Affairs**

500+ members

**Government
Affairs & Market
Access**

250+ members

Digital Health

300+ members

**In-Vitro
Diagnostics**

130+ members

**Legal Ethics &
Compliance**

150+ members

Start-Up & SME

250+ members

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Rook Quality Systems

VP of Medical Software, GM of APAC Headquarter

- 12+ years of experience in the medical device and diagnostic industry, with expertise in technical development, quality and regulatory strategy in the SaMD space.
- Extensive experience managing verification and validation testing and strategy for medical device standalone and embedded software.
- Well-versed in navigating international medical device markets, ensuring adherence to international regulatory standards.

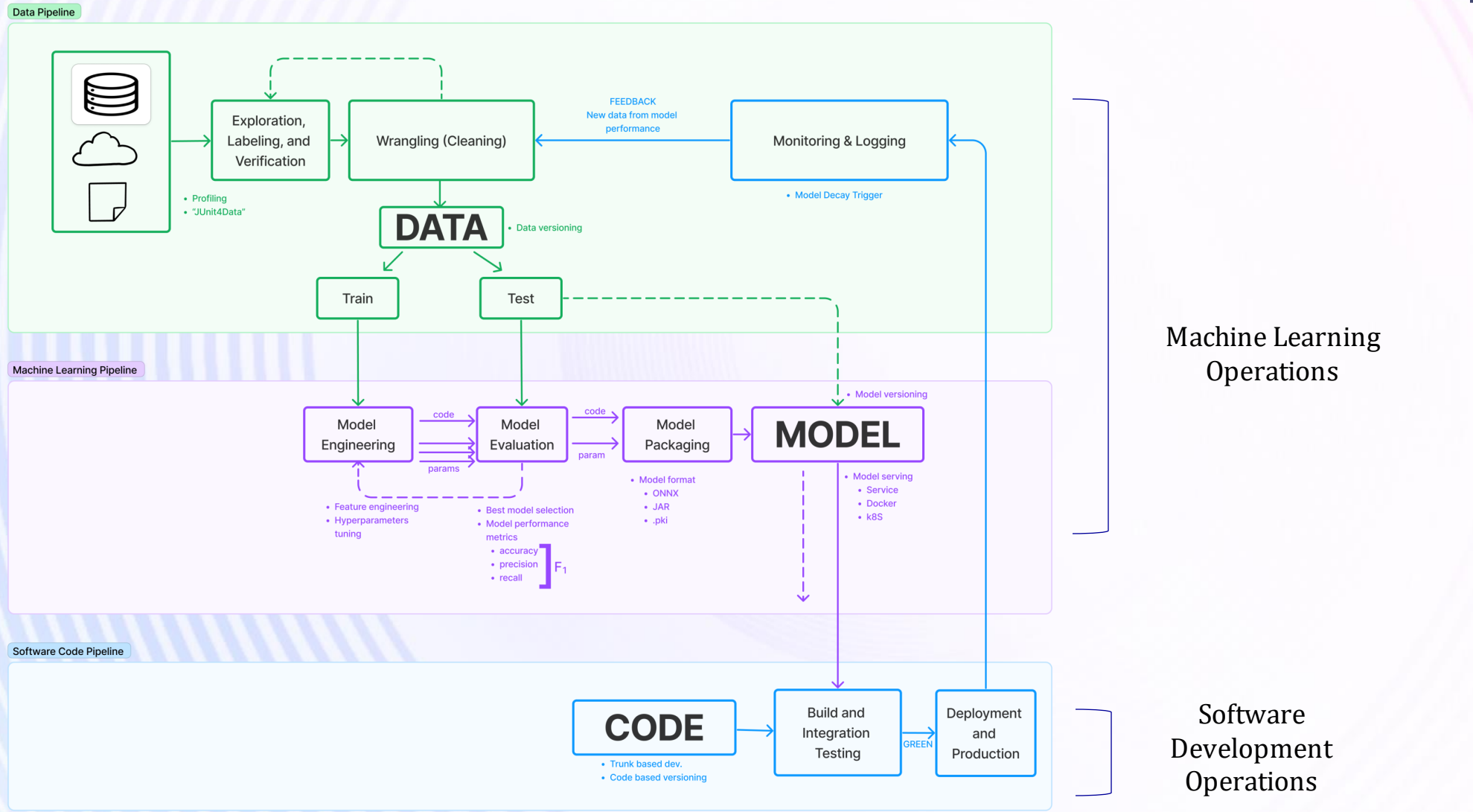


Challenges for Regulating AI/ML Solutions



- **Additional considerations for managing data pipeline and ML operations (on top of the SDLC process)**
 - Generalizability across populations and different real-world conditions
 - Security considerations across data, model, and operating system
- **Change management is necessary to maintain the performance of AI/ML devices**
 - Combat concept drift and deploy proper monitoring and maintenance schema
- **Trustworthiness of AI/ML devices**
 - Achieve better interpretability and explainability by end user through validation, model labeling, product labeling

Interaction among Dev Ops, ML Ops, and Data Pipeline



IMDRF SaMD WG
N23
Application of QMS

Interaction among Dev Ops, ML Ops, and Data Pipeline



ML Design Spec



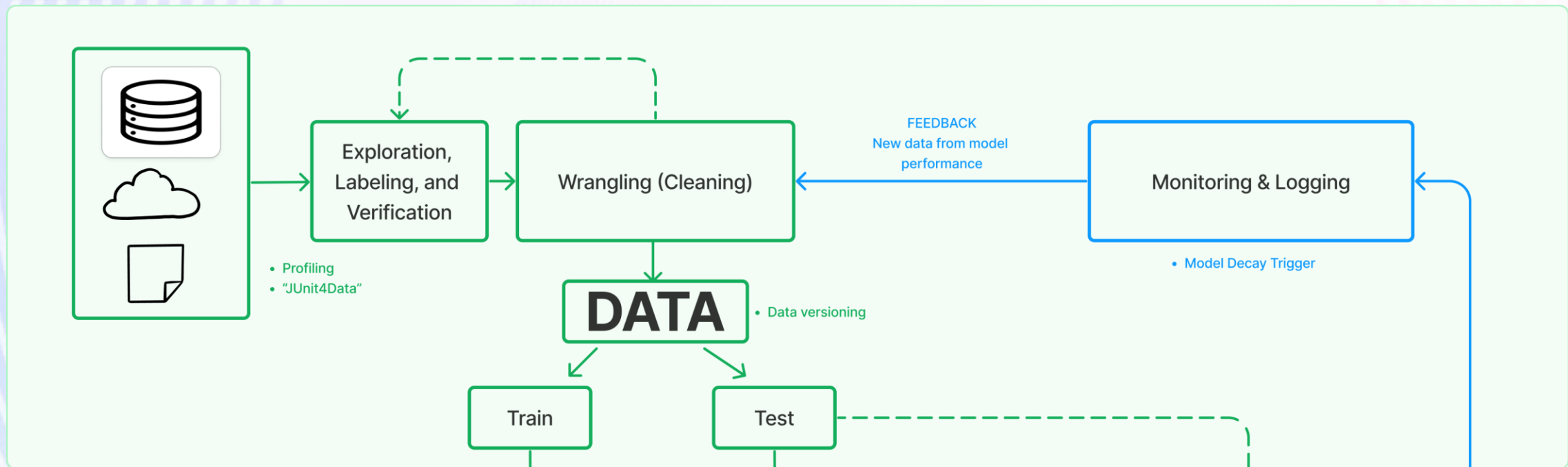
- Input Data Analysis
- Pre-Processing Schema

ML Training Plan



- Groundtruth
- Data Splitting Schema
- Database Control
- Data Versioning Schema

Data Pipeline



Machine Learning Pipeline

Interaction among Dev Ops, ML Ops, and Data Pipeline



ML Design Spec

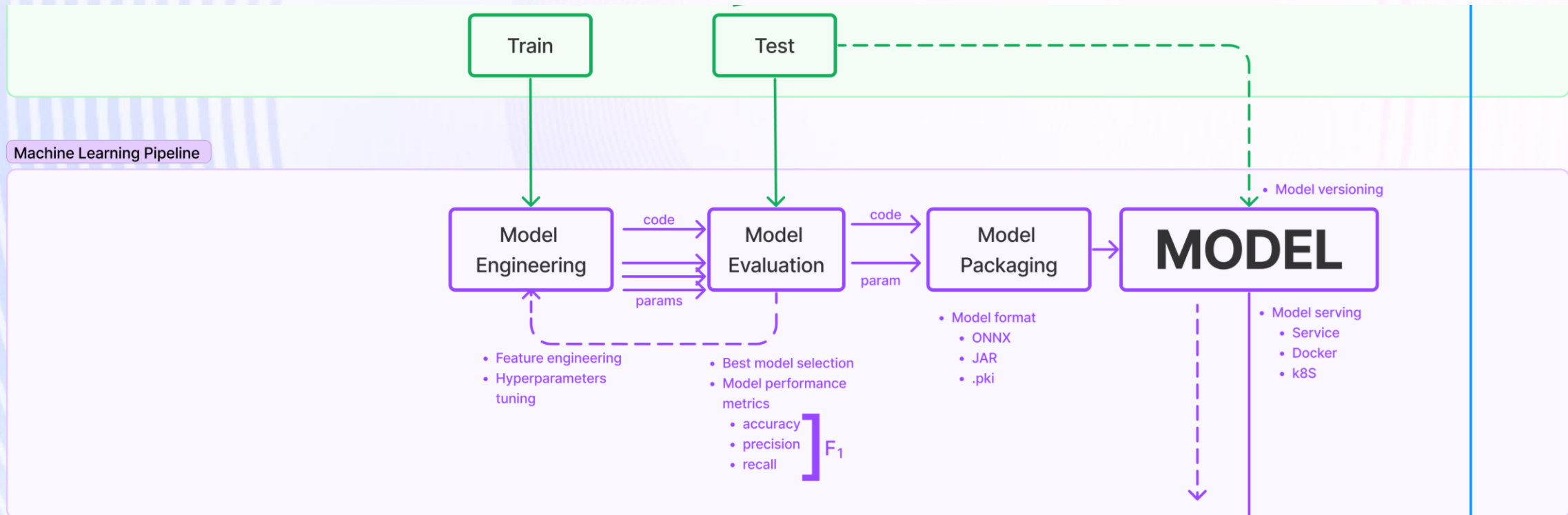


- Modeling framework
- Data Augmentation
- Neural Network Architecture
- Tuning of Hyperparameters
- Final Model

ML Training Plan



- Groundtruth
- Data Splitting Schema
- Database Control
- Data Versioning Schema



Interaction among Dev Ops, ML Ops, and Data Pipeline

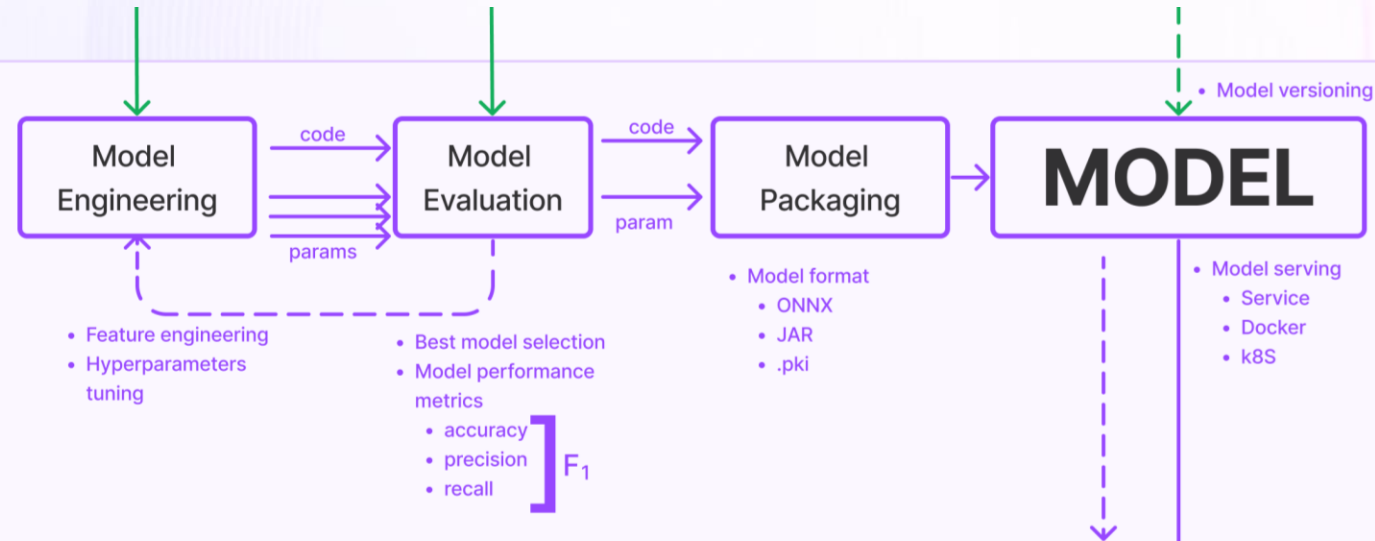


ML Validation Protocol/Report



- Study Design/Objectives
- Inclusion and Exclusion Criteria
- Study Endpoints and Performance Goals
- Statistical Considerations
- Model Results
 - Primary Endpoint (e.g., accuracy)
 - Subset Analysis – Confounding Factors
- Groundtruth Evaluation

Machine Learning Pipeline



Software Code Pipeline

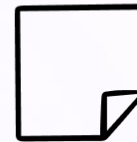
Interaction among Dev Ops, ML Ops, and Data Pipeline



Release
Documentation



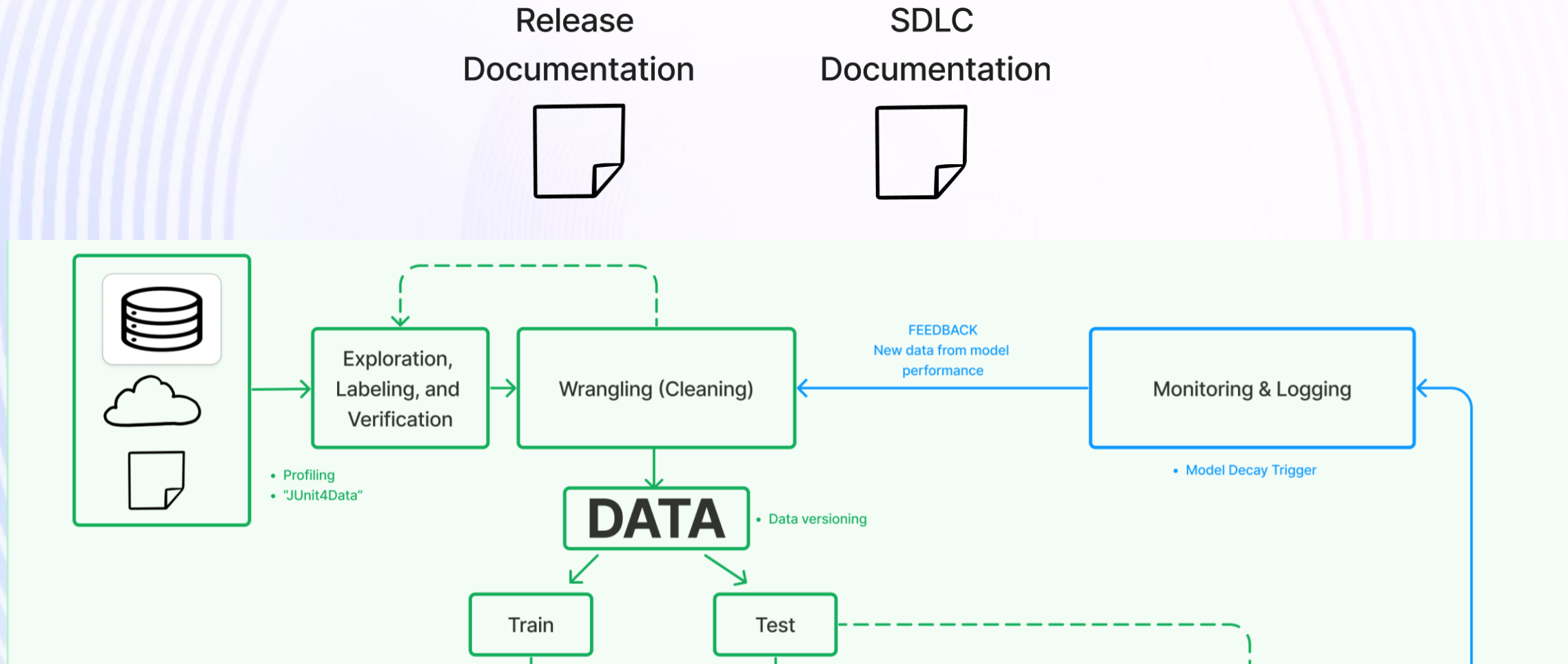
SDLC
Documentation



Software Code Pipeline



Interaction among Dev Ops, ML Ops, and Data Pipeline



Best Practices for Developing AI/ML Solutions



- Characterize device modifications (e.g., performance improvement)
- Method to develop, validate, and implement the changes
- Impact assessment to describe the risks and benefits and risk mitigations
- Labeling update

Change Management

Data Pipeline Management

- Dataset splitting
- Representative (e.g., informed by clinical participants or deployed model performance)
- Manage the Risks of degradation, overfitting, unintended bias

- IMDRF SaMD WG
- ISO 13485
- Good Machine Learning Practices guiding principles
- IEC 62304 and IEC 82304
- IEC 34971
- EU AI Act
- ISO/IEC JTC 1/SC 42

Harmonizing Regulatory Requirements

Security Considerations

- System-oriented attack
- Data-oriented attack
- Model-oriented attack

Best Practices for Developing AI/ML Solutions



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Security Considerations

Key Considerations for Conducting ML Training and Validation



Clinical Evaluation		
Valid Clinical Association	Analytical Validation	Clinical Validation
Is there a valid clinical association between your SaMD output and your SaMD's targeted clinical condition?	Does your SaMD correctly process input data to generate accurate, reliable and precise output data?	Does use of your SaMD's accurate, reliable and precise output data achieve your intended purpose in your target population in the context of clinical care?

- Relevance of available data to the clinical problem and current clinical practice;
- Data acquired in a consistent, clinically relevant and generalizable manner that aligns with the SaMD's intended use and modification plans;
- Appropriate separation between training, tuning, and test datasets; and
- Appropriate level of transparency (clarity) of the output and the algorithm aimed at users.

Best Practices for Developing AI/ML Solutions



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Harmonizing Regulatory Requirements

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Good Machine Learning Practice (GMLP) Guiding Principles

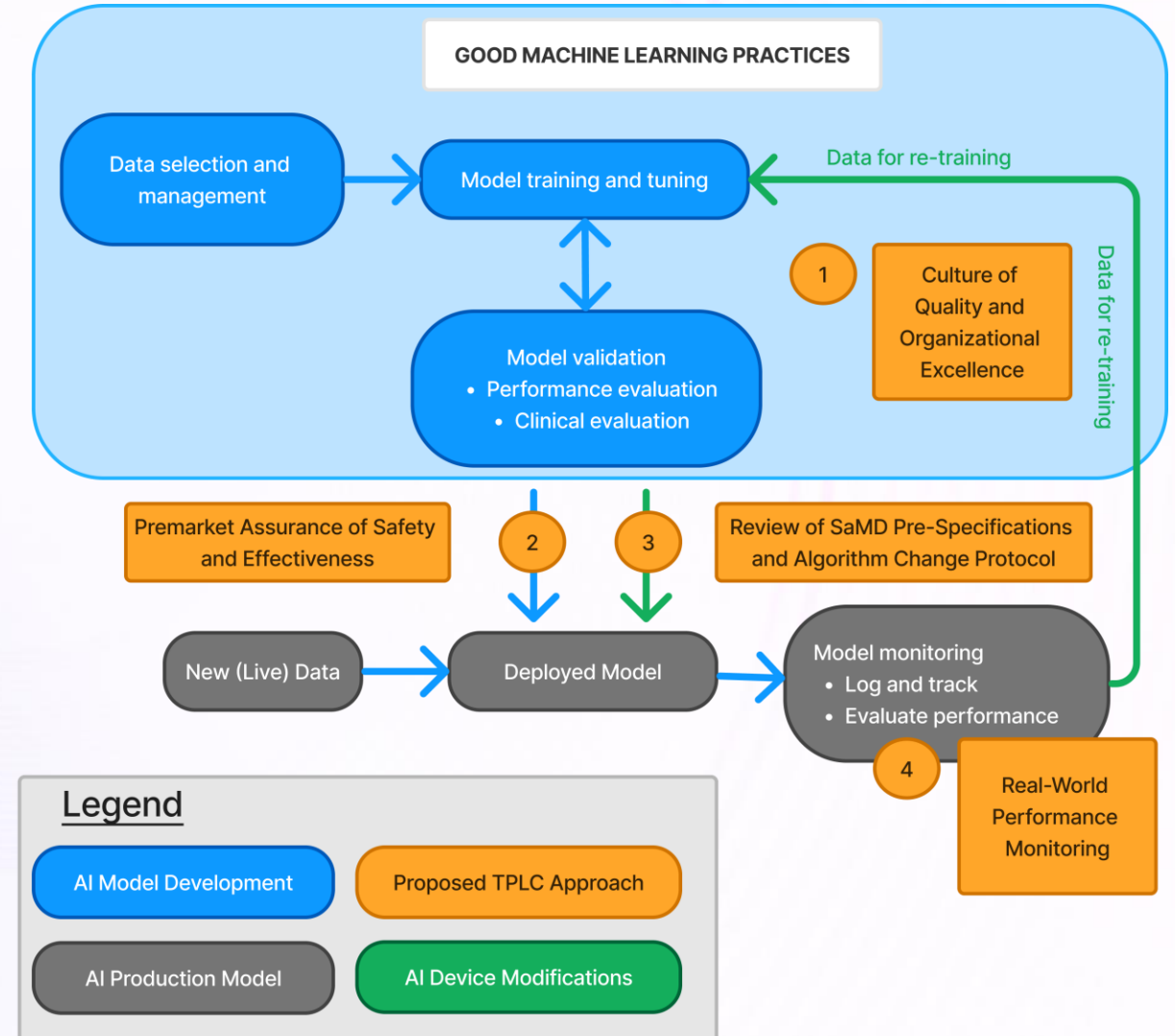


Jointly identified by the FDA, Health Canada, MHRA

Key Principles in a Nutshell

- **Good software engineering and security practices**
- **Dataset management (e.g., data split, ground truthing, generalizability...etc)**
- **Usability considerations (e.g., interpretability and explainability through validation, model labeling, product labeling...etc)**
- **Model monitoring and remediation (e.g., identify and address model degradation, unintended bias, overfitting...etc)**

1.

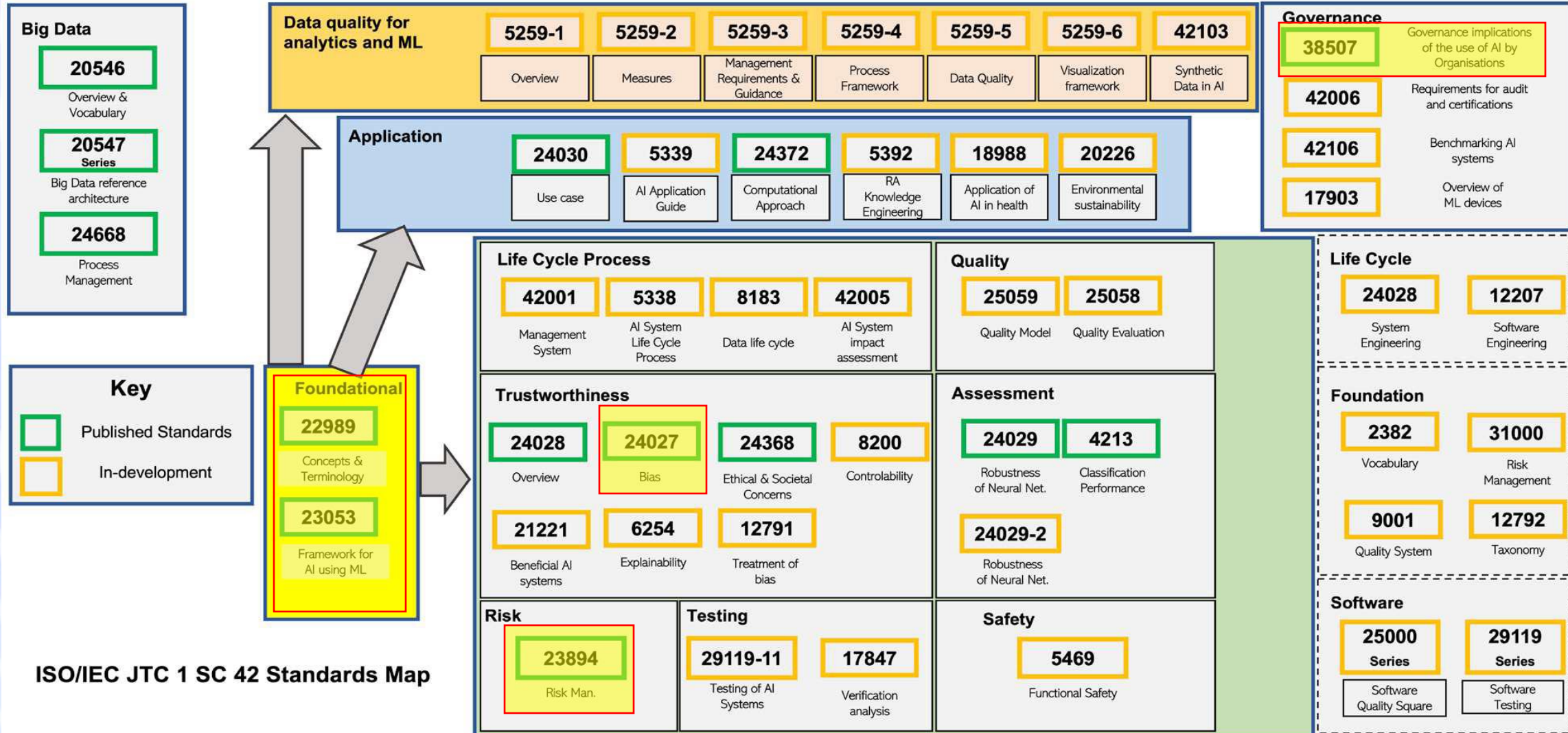


Localized Regulation/Guidance



JURISDICTION	TITLE	CATEGORY
US FDA, Health Canada, MHRA	<u>Good Machine Learning Practice for Medical Device Development: Guiding Principles</u>	General – Medical Device
US FDA	<u>Marketing Submission Recommendations for a Predetermined Change Control Plan for Artificial Intelligence/Machine Learning (AI/ML)-Enabled Device Software Functions</u>	Change Management
Japan PMDA	Regulatory Science on AI-based Medical Devices and Systems	General – Medical Device
Singapore HSA	Regulatory Guidelines for Software as Medical Device: A Life Cycle Approach (special section for AI	General – Medical Device
China NMPA	Review key points of Aided Decision-making Medical Device Software Using Deep Learning Techniques	General – Medical Device
South Korea MFDS	A guideline for Approval/Evaluation of Medical Device with Big Data and AI Technology	General – Medical Device
EU	General Data Protection Regulation (GDPR)	Data Privacy
EU	EU AI Act	General
EU	Cybersecurity Act	Security

ISO/IEC JTC 1/SC 42 Artificial Intelligence Committee



Panelist Introduction



APAC Med 10TH
ANNIVERSARY
A Decade of Progress



Paul Chua

Cybersecurity Officer,
Greater Asia (BD)



Manan Hathi

Sr. Manager, Regulatory
Affairs, Digital Health
Policy (Stryker)



Victor Tan

RAQA Manager, APAC
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(Intuitive Surgical)

Thank you!
Please rate our event



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