# 患者個別化医療機器(PMD WG)

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## 内容

- 1. IMDRF PMD WGの概要
- 2. 患者個別化医療機器の区別と規制の概要
- 3. NWI "Personalized Medical Devices-Consideration for validating design envelopes and personalized medical device production systems"の進捗
- 4. N74"Personalized Medical Devices Production Verification and Validation"について

本講演の意見に係る部分は、演者の個人的見解であり、PMDAの公式見解ではありません。

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## 患者個別化医療機器WGの概要-目的-

<u>患者個別化医療機器(Personalized medical device)を取り巻く現状</u>

▶三次元積層造形等の技術の向上

➤ これまで医療機器を作成していない 企業も医療機器業界に参戦

> ▶ 患者由来のデータをインプットする 患者個別化医療機器が各国に導入

# 患者個別化医療機器WGの概要-目的-

三次元積層造形等の製造技術の向上から、 患者由来のデータをインプットして製造するような 患者個別化医療機器の規制を各国が導入。

製造技術の革新が著しく、 製造現場も必ずしも一定の 製造所だけではない(臨床 環境下での製造\*など)。

\*いわゆるPoC(Point of Care)を想定しているが、各メンバー国で価値観が異なる。





▶ 各国の運用における課題において共通しているものをIMDRFで検討し、 規制の概要・ポイントとして整理することで、規制水準の維持に活用

# 患者個別化医療機器WGの概要

目的

▶ <u>患者個別化医療機器(Personalized medical device)</u>の規制について検討し、 ガイドライン等を発出

メンバー

オーストラリア(議長)、アルゼンチン、ブラジル、カナダ、中国、EU、日本、ロシア、サウジアラビア、シンガポール、韓国、イギリス、アメリカ

発行済み 文書

(2018年) IMDRF/PMD WG/N49 FINAL:2018

"Definitions for Personalized Medical Devices"

(2020年) IMDRF/PMD WG/N58 FINAL:2020

"Personalized Medical Devices-Regulatory Pathways"

今回進捗

(発行) IMDRF/PMD WG/N74 FINAL:2023

"Personalized Medical Devices - Production Verification and Validation"

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## 患者個別化医療機器の区別

目的

▶ <u>患者個別化医療機器(Personalized medical device)</u>の規制について検討し、 ガイドライン等を発出

本WGでいう 「患者個別化医療機器」とは?

[IMDRF/PMD WG/N49 Final:2018] 4.1

a generic term to describe any of the types of medical devices that are intended for a particular individual, which could be either a custom-made, patient-matched, or adaptable medical device.

患者個別化をコンセプトに持つ 医療機器の総称と位置づけ Custom-made medical device

Personalized medical device

Patient-matched medical device

Adaptable medical device

## 患者個別化医療機器の区別-Custom-made medical device-

Personalized Patientmedical device

Adaptable medic

[IMDRF/PMD WG/N49 Final:2018] Appendix

Artificial cervical disc replacement, requested by a spinal surgeon, for reconstruction of the cervical disc following cervical discectomy to treat cervical radiculopathy in a 7'2" male patient. In this example, the osseous dimensions of this patient's cervical spine exceed those which an available artificial cervical disc would accommodate; therefore the individual's specific needs cannot be met by an alternative device available on the market.

eal which gives linder their responsibility

[IMDRF/PMD WG/N49 Final:2018] Appendix

An acetabular cup implant requested by an orthopaedist who, in addition to DICOM-compliant scan images, sends to a 3D printing implant manufacturer specific requirements for acetabulum reconstruction by bridging the areas of acetabular bone loss. These include the thickness and trajectory of the cup mounting flange, and the number, type and positions of fixation screws.

IMDRFの定義においてCustom-made medical deviceは、特定の疾患等に合わせた 医療機器。Patient-matched medical deviceとadaptableとは異なる位置づけ。 例) 市販品が適合しない患者に合わせて製造される、人工椎間板

## 患者個別化医療機器の区別-Patient-matched medical

device-

Custom-made medical device

Personalized medical device

Patient-matched medical device

Adaptable medical d

[IMDRF/PMD WG/N49 Final:2018] Appendix

Acetabular guide designed to assist a surgeon with pre-operatively planned placement of the acetabular cup component of a total hip replacement. The guide is based upon CT images of a patient's specific anatomy and pre-operatively planned placement of the acetabular cup. The device manufacturing processes, as well as the pre-operative planning process upon which the design of the patient-matched guide is based, are validated within a certain range of anatomical parameters.

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[IMDRF/PMD WG/N49 Final:2018] Appendix

Mandibular implants produced by a 3D printing manufacturer, from a template model and DICOM files. In this example, the manufacturer provides software to the healthcare professional for the development of the 3D print file of the implant (based on the DICOM file from patient CT scans).

IMDRFの定義においてPatient-matched medical deviceは、患者の解剖学的形状が デザインの決定の要因となる医療機器

例)患者のCT画像や術前計画に基づき設計、製造される患者手術用ガイド等

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## 患者個別化医療機器の区別-specified design envelope-

Custom-made medical device

Personalized medical device

Patient-matched medical device

Adaptable medical device

#### 4.3 [IMDRF/PMD WG/N49 Final:2018]

a medical device that meets the following requirements:

 it is matched to a patient's anatomy within a specified design envelope using techniques such as scaling of the device based on anatomic references, or by using the full anatomic features from patient imaging; and ···

[IMDRF/PMD WG/N49 FINAL:2018] 4.10

#### specified design envelope.

minimum and maximum dimensions, mechanical performance limits, and other relevant factors that characterize a medical device for production purposes, which may be based on a standard device template model.

IMDRFの定義においてspecified design envelopeとは、Patient-matched medical device の製造可能な範囲(寸法範囲、使用範囲等)を指す。

## 患者個別化医療機器の区別-Adaptable medical device-

Custom-made medical device

Personalized medical device

Patient-matched medical device

Adaptable medical device

[IMDRF/PMD WG/N49 Final:2018] Appendix

Thoracolumbar pedicle screw system, which consists of multiple mass-produced components from a single manufacturer, that allows the surgeon to build an implant system, at the point of care, to fit the patient's anatomical and physiological requirements in accordance with validated instructions provided by the manufacturer.

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me manufacturer's validated instructions to

[IMDRF/PMD WG/N49 Final:2018] Appendix

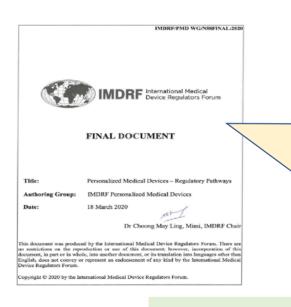
Mass-produced polymer surgical implants for cranial reconstruction that are supplied sterile and are intended to be thermoformed during the surgical procedure. The manufacturer's validated instructions provide details for heating and shaping the implant to suit a patient's particular anatomy.

IMDRFの定義においてAdaptable medical deviceは、臨床環境において患者に合わせて調整、組み立て、成形又は表示する医療機器

例) 術場で曲げ加工を行う骨接合用のプレートや脊椎固定のためのロッド等

## 患者個別化医療機器規制の概要

IMDRF/PMD WG/N58 FINAL:2020 IMDRF PMD WGは、患者個別化医療 機器規制のBest practiceを整理



[IMDRF/PMD WG/N58FINAL:2020] 1.0

···Technologies such as additive and subtractive manufacturing (see Appendix 1), especially when combined with digital patient data, have made "custom-made" devices, including implantable devices for particular patients, within reach on a much greater scale. Advancing technology has also enabled a shift to point-of-care manufacturing (see Appendix 2). Regulations were not necessarily designed to address this form of manufacturing and, consequently, some jurisdictions are noticing questionable use of custom made device exemption pathways for higher risk classification medical devices. Growing numbers of patients are receiving these medical devices, to meet their particular needs, without there being adequate regulatory oversight in place.

効果的な治療の実現に伴った製造の多様性に合う医療機器規制が必要

▶ 患者個別化医療機器の分類に応じた規制の方法を提示。

### 患者個別化医療機器規制の概要 -Medical Device Production Systems (MDPS)-

患者個別化医療機器に含まれるものは、臨床環境下での製造・使用において有効性及び安全性が変わることが考えられることから、Medical Device Production Systems (MDPS)の概念を説明。

#### [IMDRF/PMD WG/N58FINAL:2020] Appendix 1

- ··· A Medical Device Production System (MDPS) is manufactured by a regulated manufacturer for the purpose of producing personalized medical devices by end users, usually health professionals, and usually at the point of care ···
- ··· A medical device production system (MDPS) is a collection of the raw materials, software and digital files, and main production and post-processing (if applicable) equipment intended to be used by a healthcare provider, or healthcare facility, to produce a specific type of medical device at the point of care, for treating their patients ···
  - ▶ 患者個別化医療機器を、臨床環境下で製造するシステムを想定。
  - ▶ 患者個別化医療機器が使用されるまでに想定される製造や変更の要因を体系的に検討する考え方。

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NWI "Personalized Medical Devices-Consideration for validating design envelopes and personalized medical device production systems"の進捗

#### 活動 目的

各国の患者個別化医療機器規制の検討のため、患者個別化医療機器に要求される評価の概要を整理

#### 活動 内容

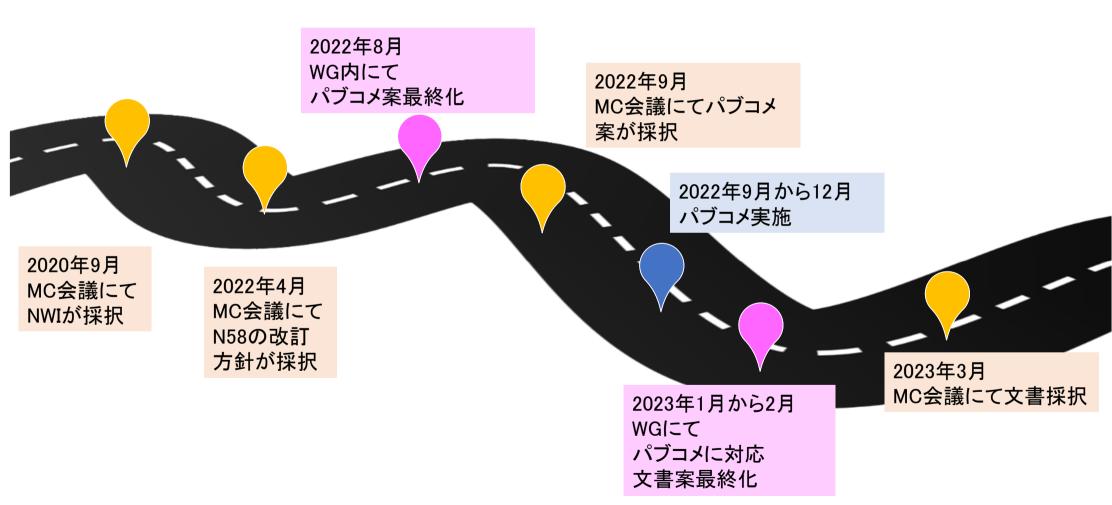
- 〇各国の患者個別化医療機器の評価の共通項を探り、患者個別化医療機器及びMDPSの検討・評価時のポイントを整理。
- Ospecified design envelope及びMDPSについての評価における観点を明確化し、文書化する。
- 〇作業の過程で、規制整理が必要とされ発行済み文書N58の改訂作業も 並行して実施。



#### 活動 成果

Ospecified design envelope及びMDPSについての評価における観点を整理した文書N74を発行

NWI "Personalized Medical Devices-Consideration for validating design envelopes and personalized medical device production systems"の進捗



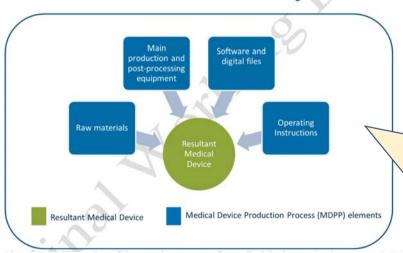
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NWI "Personalized Medical Devices-Consideration for validating design envelopes and personalized medical device production systems"の進捗(N58改訂内容)

Omedical device production systems (MDPS) の定義について、患者個別化医療機器に限定しないものに変更。

OMDPSの枠組みについてより現実に即したものへ変更。

#### **Medical Device Production System**



IMDRF/PMD WG/N58 PROPOSED REVISIONS:2022 [IMDRF/PMD WG/N58] Appendix 1

Medical Device Production Process (MDPP) elements:

which may include raw materials, main production and postprocessing equipment, software and digital files, and the operating instructions supplied by the MDPS manufacturer to produce a specific medical device; and

#### Resultant Medical Device:

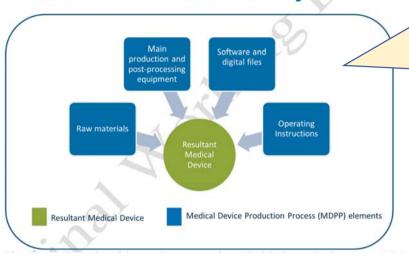
the specific medical device that the MDPP produces using the operating instructions supplied by the MDPS manufacturer.

RMD:製造される機器 MDPP:製造に使用する要素

MDPS:RMD、MDPPを包括的に捉えたシステム

NWI "Personalized Medical Devices-Consideration for validating design envelopes and personalized medical device production systems"の進捗(N58改訂内容)

#### **Medical Device Production System**



IMDRF/PMD WG/N58 PROPOSED REVISIONS:2022 [IMDRF/PMD WG/N58] Appendix 1

a)Build, Own, Operate model:

the MDPS manufacturer takes the responsibility for the installation, ongoing maintenance including (but not limited to) supply of spare parts and raw materials, and execution of the MDPP at the HCF. The MDPS manufacturer takes the ongoing responsibility for the resultant medical devices that the MDPP produces.

[IMDRF/PMD WG/N58] Appendix 1

b)Build, Own, Operate, and <u>Transfer</u> model:

c)Build, Own, Transfer:

BOO model: MDPS製造業者がMDPS及びRMDの責任を有する。

⇒本邦の従来の医療機器規制と類似

BOOT/BOT model: MDPS使用者が一部責任を有する。

⇒MDPS製造業者の設定した仕様を超えて使う=本邦での適応外使用に類似

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NWI "Personalized Medical Devices-Consideration for validating design envelopes and personalized medical device production systems"の進捗

#### 文書における患者個別化医療機器の範囲についての検討

#### (WG検討で挙がったコメント)

- ・IVD医療機器、SaMDや生物由来原材料を使用した医療機器の分野は、各国の規制がばらばらであり、共通項の検討は不可能。
- ・整形領域の人工膝関節など、3Dプリンティング等で「もの」として製造ができる医療機器であれば可能。



文書N74のスコープでは、IVD医療機器、SaMDを含む医療機器、生物由来原材料を使用した医療機器、医薬品成分を含有した医療機器、能動型医療機器を除外。

(パブリックコメント: N58改訂に対して)

・今回の文書はIVD医療機器の考え方にも応用できるのではないか?



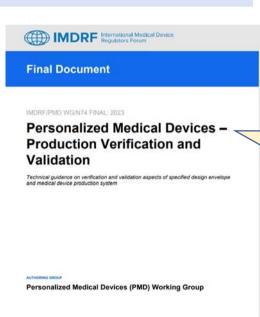
今回の活動の目的を踏まえ、IVD医療機器はスコープに含めない形で最終化。 将来的に、IVD医療機器もスコープに含めるような定義変更することも検討される可能性あり。その場合は、IVD WGとも協力の上での活動か。

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# N74"Personalized Medical Devices - Production Verification and Validation"概要

# IMDRF/PMD WG/N74 FINAL:2023



#### [IMDRF/PMD WG/N74] 1.0

···The present guidance is a continuation of these two documents (N49 and N58) and is intended for use by industry, RAs, CABs, and others.

The first half of this guidance provides technical considerations for verification and validation aspects of specified design envelope for patient—matched medical devices.

The second half of the guidance covers technical considerations for verification and validation aspects of an MDPS (which is a medical device in its own right).

- patient-matched medical device
- ▪medical device production system (MDPS) 設計検証及び妥当性確認における検討事項を整理

# N74"Personalized Medical Devices - Production Verification and Validation"について -Specified design envelope-

目的

patient-matched medical device (Specified design envelope)の設計及び妥当性検証に必要な検討事項を整理

Specified design envelopeを設定すべきパラメータは?

どのようにSpecified design envelopを設定すべきか?

#### 5.3 [IMDRF/PMD WG/N74]

Structural parameters, Material parameters, Manufacturing parameters, Clinical environment parameters, Performance parameters, Miscellaneous parameters

#### 5.0 [IMDRF/PMD WG/N74]

The manufacturer of a patient-matched medical device should establish the boundaries for each of the parameters that characterize the specified design envelope, by testing production units of the device under real or simulated conditions of use. The manufacturer should demonstrate by objective evidence that devices produced within the bounds of validated parameters of a specified design envelope meets the user needs and the intended uses, and comply with the relevant provisions of the Essential Principles.

試験結果に基づき製造可能範囲を決め、その範囲で製造した機器の性能を担保。

# N74"Personalized Medical Devices - Production Verification and Validation"について - Medical Device Production Systems (MDPS)

目的

MDPSの設計及び妥当性検証に必要な検討事項を整理

MDPSの開発 で検討すべき 観点は?

#### 6.2 [IMDRF/PMD WG/N74]

···the design and development of the MDPS involve assessments of individual pieces of the system and the whole system collectively···

#### 6.2.4 [IMDRF/PMD WG/N74]

···For the MDPS, the manufacturer is responsible for addressing both the ability of health care facilities to use the MDPP elements to produce the resultant medical device, and ensuring that the resultant medical device meets the user needs for the established intended use. The resultant medical device that the MDPP elements are intended to produce could be validated using methods typically used for a comparable medical device produced at traditional manufacturing facilities.

MDPSの各要素とともにRMD(製造される機器)の検証及び妥当性確認が必要。

### 活動報告のまとめと想定される今後のWG活動

### 活動報告

患者個別化医療機器の製造における設計及び妥当性検証における検討事項を 整理したIMDRF文書(IMDRF/PMD WG/N74)を発表

### 想定される今後の活動

- 患者個別化医療機器規制のベストプラクティスを整理したIMDRF文書 (IMDRF/PMD WG/N58FINAL:2020)の改訂版を発表
- 文章の実装状況を注視しつつ、フィードバックを収集。
- 文書改訂や追加文書(Q&A)の必要性を検討。
- PoC(Point of Care)の多国間で共通した定義の明確化について検討される可能性もある。

# ご清聴ありがとうございました。