



# **IMDRF/DITTA Joint Virtual Workshop**

*Monday 16 March 2021*

***What to learn from COVID 19?***

## **Emergency Use Diagnostics: An IVD Developer's Perspective**

**Danelle R. Miller, JD**

*Vice President, Global Regulatory Policy & Intelligence  
Roche Diagnostics*



# Roche Diagnostics SARS-CoV-2 Diagnostics Portfolio<sup>1</sup>

*Comprehensive portfolio of tests and digital solutions*



## Clinical Labs

## Near Patient

	Clinical Labs	Near Patient
<b>Molecular solutions</b>	<ul style="list-style-type: none"> <li>TIB MOLBIOL LightMix<sup>®</sup> Modular SARS-CoV-2 <b>Launched</b></li> <li>cobas<sup>®</sup> SARS-CoV-2 <b>Launched</b></li> <li>cobas<sup>®</sup> SARS-CoV-2 &amp; Influenza A/B <b>Launched</b></li> </ul>	<ul style="list-style-type: none"> <li>cobas<sup>®</sup> SARS-CoV-2 &amp; Influenza A/B <b>Launched</b></li> </ul>
<b>Immunology solutions</b>	<ul style="list-style-type: none"> <li>Elecsys<sup>®</sup> Anti-SARS-CoV-2 <b>Launched</b></li> <li>Elecsys<sup>®</sup> Anti-SARS-CoV-2 S<sup>2</sup> <b>Launched</b></li> <li>Elecsys<sup>®</sup> Anti-SARS-CoV-2 antigen <b>Launched</b></li> <li>Elecsys<sup>®</sup> IL-6 Test to diagnose cytokine release syndrome <b>Launched</b></li> </ul>	<ul style="list-style-type: none"> <li>SARS-CoV-2 rapid antibody <b>Launched<sup>3</sup></b></li> <li>SARS-CoV-2 rapid antigen <b>Launched<sup>3,4</sup></b></li> <li>SARS-CoV-2 rapid antigen (saliva/nasal) <b>Launched<sup>3</sup></b></li> <li>SARS-CoV-2 &amp; Influenza A/B rapid antigen <b>In-development<sup>3</sup></b></li> </ul>
<b>Digital solutions</b>	<ul style="list-style-type: none"> <li>Viewics LabOps COVID-19 for efficiency improvements <b>Launched</b></li> </ul>	<ul style="list-style-type: none"> <li>NAVIFY Remote Monitor<sup>4</sup> <b>Launched</b></li> <li>v-TAC<sup>5</sup> digital algorithm for blood-gas <b>Launched</b></li> <li>iThemba Life COVID-19 <b>Launched</b></li> </ul>

<sup>1</sup> Not all products are available in all countries; <sup>2</sup> S=spike protein; <sup>3</sup> external distribution partnership; <sup>4</sup> US only; <sup>5</sup> v-TAC=venous to arterial conversion



# Developer Challenges



- Compressing years of **development** into months
- Clinical and Regulatory
  - **Access** to specimens/virus
  - Lack of clarity in regulation, **divergent emergency regulatory mechanisms** around the world
  - **Local clinical studies** in some markets
- Scaling **production** in a short period of time
- **Capacity** of clinical labs
  - Dependent on installed base of analyzers on which tests will run
  - Availability of trained staff under CLIA
  - In some cases, can produce faster than labs can run the test
- Availability of **consumables** needed to collect specimens or run tests (e.g., swabs, PPE)
- Access to **Real World Data** on specific tests in some markets



# COVID-19 is draining regulatory resources worldwide

- **>7,600** entries of COVID-19 trials in WHO International Clinical Trials Registry Platform (ICTRP)\*
- **1,031** test kits commercially available or in development for the diagnosis of COVID-19 listed in the FIND database\*

Sheer volume of innovation



- About **75% of regulatory authorities** struggle to perform all core functions consistently well and depend often on better resourced authorities in other countries\*\*
- Even well-resourced regulators are putting non-COVID-19 related product submissions on the back burner

Lack of regulatory capacity



- Ensuring access to new generations of products and cumulative innovation around the evolving science **of the novel virus** is critical

Evolving science of the new virus



\*\*Source: Global regulatory agility during covid-19 and other health emergencies, <https://www.bmj.com/content/bmj/369/bmj.m1575.full.pdf>

\*Site visited January 18, 2021



# IMDRF regulators have shown regulatory agility during pandemic



Country	Emergency Pathway?	Timeline*	Normal timeline*	Reliance Model?
Australia	Yes	1-2 weeks	5-6 months class 3	Yes
Brazil	Yes	2-3 weeks	3 months class 3	Yes (MDSAP only)
Canada	Yes	5 days - 2 months	12 months class 4	Yes
China	Yes	1-3 days (beginning)	6-8 months class 3, excluding clinical study timeline	No
EU	No	Self-declaration of conformity	Self-declaration of conformity	No
Japan	Yes	2-5 weeks	1 year for class 3	Yes (MDSAP Pilot only)
Russia	Yes	2 weeks	50 working days (official review) class 3, excluding clinical trials and supplement request	No
Singapore	Yes	3 days -3 weeks	8 and 11 months class C&D via abridged path	Yes
South Korea	Yes	2-8 weeks (beginning)	80 working days (official review) class 3, excluding supplement request	No
US	Yes	1 day – 3 months	6-8 months class II de novo	Yes (MDSAP only)

\*Timelines reflect review timelines based on observations, estimation



DITTA

# Lessons Learned (So far. . . )



IMDRF

- **Prioritize** based on what is needed at each pandemic phase
- Leverage **regulatory reliance and convergence** models to avoid duplication
  - Premarket authorizations
  - Clinical evidence
  - MDSAP
- Practice **regulatory agility** during & beyond the pandemic, including:
  - Risk-calibrated pre-market authorizations
  - Implement remote audits in place of physical inspections
- Further develop agile regulatory concepts and practices to optimize use of regulator and industry resources, and speed patient access to innovative technologies
  - Consider development of a common **emergency use pathway** globally
- Improve access, leverage **real world data** to monitor performance and bring products to full market authorization



**DITTA** GLOBAL DIAGNOSTIC IMAGING,  
HEALTHCARE IT & RADIATION THERAPY  
TRADE ASSOCIATION



**IMDRF** International Medical  
Device Regulators Forum

**Thank you!**