

# REGULATORY CONTROL OVER RAPID CHANGE OF MEDICAL SOFTWARE & HEALTH IT INDUSTRY

























## XXX SOFTWARE

Version 1.0 – Initial Release

Version 1.0 A – Bug Fix

Version 1.1~1.5 – Minor New Feature added

Version 2.0 – Major Change:

Change of Intended Use























### SCENARIO 1: FREQUENT CHANGE OR UPDATES OF SOFTWARE



### Scenario

- Software version release is very fast and License amendment process cannot catch the speed of the release. Customer cannot use latest version of software (which might be a safer & advanced version); Multiple version of changes pending before the license amendment is
- В. completed.
- In some jurisdiction they may not continue to deliver version 1.0 due to safety issues, if it links to safety alerts

### Consequence

Latest version such as 1.2>2.0 cannot be supplied until Ver. 1.0A &/or 1.1 is/are approved. Manufacturer must submit another license amendment for later version, total time to gain market access cannot be estimated/ predicted























# SCENARIO 2: LONG DEVELOPMENT TIMELINE FOR SOFTWARE FIX TOGETHER WITH NEW FEATURE



### **Scenario**

- A. In some jurisdictions, manufacturer may not be able to continue supply version 1.0 & 1.1, due to safety issues for 1.0 and 1.1 were not reviewed by authority. Authority demands manufacturer should update their license before new delivery continues.
- B. Software that has higher Medical Device risk classification or software safety classification, the development, verification and validation process could be longer up to 1-1.5 year.

### Consequence

- 1. No new delivery until FSCA/recall is closed. However, adding up the time required for license amendment the whole process could take more than 1.5 2 year.
- 2. New customer cannot purchase the product even though user notice is supplied, user understands the risk, manufacturer / local distributor guarantee the upgrade when it is released.
- 3. New customer complains and patients have no access this product
- 4. A long queue of patients in order to use this medical system, patients suffer from waiting and delayed medication / treatment.

























# THANK YOU!



















