

Internship Training

at

Curio Digital Therapeutics

by

Name: **Dr. Divya Gupta**

Enrollment No: **PG/21/33**

On

The Role of FDA 510k Approval in Clearance of Software as A Medical Device.

Under the guidance of

Dr. Sumesh Kumar
Dean Academics and Student Affairs

PGDM (Hospital and Healthcare Management)

Batch: 2021-2023



International Institute of Health Management Research, New Delhi

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VP – Digital Solution and Compliances

PGDM (Hospital and Healthcare Management)



Batch: 2021-2023

International Institute of Health Management Research, New Delhi

**Completion of Dissertation from
Curio Digital Therapeutics**

The certificate is awarded to

Dr. Divya Gupta

in recognition of having successfully completed her

Internship in the Department of

Medical Software Quality Assurance

and has successfully completed her Project on

**The Role of FDA 510k Approval in Clearance of Software as A
Medical Device**

Date_15th February to 15th May 2023

Organization - Curio Digital Therapeutics

She comes across as a committed, sincere & diligent person who has a strong drive & zeal
for learning.

We wish her all the best for future endeavors.



Training & Development

Dr. Pankaj Gupta

**VP – Digital Solution and Compliances
Curio Digital Therapeutic**



Zonal Head – Human Resources

Mandeep Wazir

**VP – India Operations
Curio Digital Therapeutics**

TO WHOMSOEVER IT MAY CONCERN

This is to certify that Dr. Divya Gupta student of PGDM (Hospital & Health Management) from the International Institute of Health Management Research, New Delhi has undergone internship training at Curio Digital Therapeutics from 15th February to 15th May 2023.

The Candidate has successfully carried out the study designated to her during internship training and his approach to the study has been sincere, scientific, and analytical.

The Internship is in fulfillment of the course requirements.

I wish her all success in all his future endeavors.



Dr. Sumesh Kumar

Associate Dean, Academic, and Student Affairs

IIHMR, New

Delhi



Dr. Sumesh Kumar

Mentor- Dr. Sumesh Kumar
Associate Dean, Academic,
and Student Affairs
IIHMR, New Delhi

Certificate of Approval

The following dissertation titled “**The Role of FDA 510k Approval in Clearance of Software as A Medical Device**” is hereby approved as a certified study in management carried out and presented in a manner satisfactory to warrant its acceptance as a prerequisite for the award of PGDM (Hospital & Health Management) for which it has been submitted. It is understood that by this approval the undersigned do not necessarily endorse or approve any statement made, opinion expressed or conclusion drawn therein but approve the dissertation only for the purpose it is submitted.

Dissertation Examination Committee for evaluation of the dissertation.

Name

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Sukesh Bhargava

Signature

[Signature]

[Signature]

Sukesh

Certificate from Dissertation Advisory Committee

This is to certify that **Dr. Divya Gupta**, a graduate student of the **PGDM (Hospital & Health Management)** has worked under our guidance and supervision. She is submitting this dissertation titled “**The Role of FDA 510k Approval in Clearance of Software as A Medical Device**” at “**Curio Digital Therapeutics**” in partial fulfillment of the requirements for the award of the **PGDM (Hospital & Health Management)**.

This dissertation has the requisite standard and to the best of our knowledge, no part of it has been reproduced from any other dissertation, monograph, report, or book.



Dr. Sumesh Kumar

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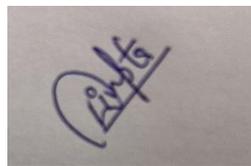
RESEARCH,

NEW DELHI

CERTIFICATE BY SCHOLAR

This is to certify that the dissertation titled “**The Role of FDA 510k Approval in Clearance of Software as A Medical Device**” submitted by Dr. **Divya Gupta**... Enrollment No. PG/21/33 under the supervision of **Dr. Sumesh Kumar** for the award of PGDM (Hospital & Health Management) of the Institute carried out during the period from **15th February to 15th May 2023** embodies my original work and has not formed the basis for the award of any degree, diploma associate ship, fellowship, or titles in this or any other Institute or other similar institution of higher learning.

Student Signature: Dr. Divya Gupta



FEEDBACK FORM

Name of the Student: Dr. Divya Gupta

Name of the Organization in Which Dissertation Has Been Completed: Curio Digital Therapeutics

Area of Dissertation: Medical Software Quality Assurance

Attendance: 100 %

Objectives achieved:

1. Manual Testing Execution and maintaining full testing documentation under the supervision of the testing leader.
2. Quality Management system implementation documentation under the supervision of the QA leader. Writing the software requirement specification and traceability matrix.
3. Content writing for women's mental health under the supervision of the product lead. Build a library of wellness content and the cards for the templates.

Deliverables:

1. Manual Testing
2. Manual Test Cases
3. FDA Documentation: Functional Requirement Specification
Software Requirement Specification
CBT User Story
4. CE Mark Documentation
5. Writing Scripts for various product
6. Content Management

Strength:

1. Diligent
2. Team Player
3. Consistent
4. Proactive
5. Committed
6. Hardworking

Suggestion For Improvement: Continue seeking growth opportunities to further enhance skills and expand contributions.

Suggestion for Institute (course curriculum, industry interaction, placement, alumni): Industry alliances for practical training on a regular basis for students. Job training, summer training, and internship are not enough for good hands on.

Signature of the officer-in-charge/ Organization Mentor



Dr. Pankaj Gupta

Date: 9th June 2023

Place: Curio Digital Therapeutics, Gurugram

ACKNOWLEDGEMENT

I would want to extend my sincere thanks and appreciation to everyone who helped get this research study done. Working with such an amazing team of people has been a true honor, and I am truly thankful for their help and support.

I want to start by sincerely thanking **Dr. Pankaj Gupta (VP- of Digital Solution and Compliances)** for giving me the chance to conduct secondary research in **Medical Software Quality Assurance**. This project's direction has been significantly shaped by his inspirational ideas and constant leadership.

I would want to publicly express my profound appreciation to my mentor **Dr. Sumesh Kumar**, for his thoughtful and priceless advice. His knowledge and assistance have been of immeasurable value to my study's theoretical and practical components.

I want to sincerely thank everyone who has contributed their time, offered to help, and given support and direction during this project.

Lastly, I would like to acknowledge **my family, friends, and colleagues'** constant support and guidance throughout my journey at IIHMR. Their belief in my abilities and willingness to listen to my problems have been a constant source of motivation.

Divya Gupta

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ABBREVIATION	MEANING
1. FDA	Food and Drug Administration
2. 510k	Regulatory Compliance number
3. ISO	An international standard for the organization
4. CE Mark	Conformite Europeene
5. GMP	Good Manufacturing Practice
6. NSE	Not Substantially Equivalent
7. CFR	Code of Federal Regulations
8. DTx	Digital Therapeutics
9. EHR	Electronic Health Record
10. QA	Quality Assurance
11. SGR	Statistical Graphical Representation
12. SaMD	Software as a Medical Device
13. EU MDR	European Union Medical Device Regulations
14. EEA	European Economic Area
15. FD&C	Federal Food, Drug, and Cosmetics

Figures	Representation
Figure 4.1	Analysis of SaMD devices clearance in 510k Process
Figure 4.2	Representation of Solution providing and Product based
Figure 4.3	Representation of the product line
Figure 4.4	Analysis of Class I, II, III devices

ORGANIZATION OVERVIEW

At Curio™, we believe that the mind-body relationship plays a profound role in a woman's health. We connect the dots between mental and physical well-being with our comprehensive solutions. Our programs are based on evidence and clinically validated trials to carefully manage behavioral and physiological conditions.

Facilitating digital wellness through self-guided programs, health coaches, connectivity with providers, and timely behavioral health support, Curio™ intelligently and empathetically guides each user to the care needed, at the right time. On-demand, life cycle-specific help has never been simpler.

VISION:

The ideal care for women, anywhere, anytime.

MISSION:

We provide comprehensive healthcare solutions for women throughout the cycle of life. We focus on delivering proven digital behavioral health interventions combined with connectivity to healthcare providers, digital health coaches, and resources. Our programs are developed to give women high-quality care that is targeted for each situation.

VALUES

- In curio Passion, determination, and innovation plays a very important role, not just being committed to the work but to the company.
- Curio brings out the best in your as they have different sets of pioneer heads which will encourage you to bring up your skills
- Every day new challenge means new learning

SCOPE OF SERVICES

- Personalized coaching
- Community-based care
- Digital health coaches
- Behavioral Tele-healthcare
- Intelligent personalized guidance
- Clinician trained

CHAPTER -1

INTRODUCTION

Numerous innovations have resulted from the fusion of software and healthcare, revolutionizing how doctors identify, treat, and oversee patient care. Software as a Medical Device (SaMD) is one significant advancement in this area. Without being a component of a physical medical device, SaMD refers to software programs that are intended for use in the diagnosis, treatment, or prevention of illnesses.

SaMD is a significant advancement in healthcare technology that has the potential to significantly enhance patient outcomes, boost productivity, and enable individualized treatment. It includes a wide range of applications, including digital therapies, telemedicine platforms, clinical decision support systems, and mobile health apps.

Software as a Medical Device (SaMD): Structured Overview:

Definition and Purpose:

Software called SaMD was created expressly with medical functions and goals in mind.

It works with general-purpose computing devices including laptops, smartphones, and tablets.

SaMD can help with clinical decision-making, patient monitoring, and management of health. It can also give medical information.

Framework for Classification and Regulation:

Regulatory organizations, like the European Commission and the U.S. Food and Drug

Administration (FDA), have developed frameworks to categorize and control SaMD depending on its intended use and risk profile.

Risk categories like Class I, Class II, and Class III are frequently used in classification, with increased degrees of inspection and regulatory requirements for applications with higher levels of risk.

SaMD has a lot of potential to improve healthcare delivery by permitting personalized treatment regimens, improving diagnostic accuracy, and enabling remote patient monitoring.

By enabling self-management of chronic illnesses, facilitating access to real-time health information, and encouraging preventative care, it can empower individuals.

SaMD has the ability to improve patient safety and care overall while streamlining processes and lowering healthcare expenditures.

Challenges and Things to Think About

SaMD's safety, effectiveness, and dependability must all be guaranteed, which is a significant problem that calls for thorough validation, testing, and ongoing observation.

To keep patients' confidence, privacy, and security issues relating to cybersecurity risks and patient data protection must be addressed.

It is crucial to follow quality standards and adhere to regulations in order to satisfy the strict criteria of medical device regulations. The integration of SaMD applications has the potential to revolutionize healthcare delivery, empowering both healthcare professionals and patients with valuable tools for diagnosis, treatment, and disease prevention. However, addressing regulatory requirements, ensuring patient privacy and safety, and maintaining ethical standards are paramount to harnessing the full potential of SaMD and advancing the future of healthcare.

NEED OF THE STUDY

1. Unique Requirements of diagnostic procedures: SaMD has started processing in the streamlined workflow process, reducing paperwork, and improving the efficiency the patient care and electronic health record (EHR).
2. SaMD as a new market evolution – The market has started revolutionizing software as a Medical Device and the future holding market value is going to be great in five years. So, knowing the statistical data that how many companies will dominate in the market for knowing the choices which have undergone the 510k process.
3. Patient Safety and Trust: The 510(k) process is designed to prioritize patient safety by ensuring that medical devices meet certain regulatory standards. When a medical device has obtained 510(k) clearance, it signifies that the FDA has reviewed its safety and effectiveness based on available information. This helps build trust among healthcare professionals and patients, assuring them that the device has undergone scrutiny and meets regulatory requirements.

OBJECTIVE OF THE STUDY

Primary Objective - To analyze the number of software as medical devices which have undergone the 510K process

Secondary Objective -

1. To find out the reason: why 510k approval is needed by FDA for clearance and how much importance it holds
2. To find out the reasons for the 510k failures.

SCOPE OF THE STUDY

The study aims to analyze the effectiveness of the FDA 510(k) clearance). The study will analyze the 510(k) clearance process and assess the regulatory controls placed on SaMD by the FDA. The study will explore the SaMD devices which have undergone 510 (k) clearance procedures and the reason associated with success and failure rates on SaMD.

The study provides a detailed structured literature analysis of the 510K approval which is required for the software as a medical device.

The research will provide an analysis of the devices which were applied, approved, or rejected and those that are in the process of 510k approval. It would be ensuring quality data in accordance with the research topic.

Concerning the objectives, the study will provide a detailed analysis of the company which has been set up to the approval for the 510k as well as the devices belonging to class I, II, III.

The study contains a detailed discussion of the Indian SaMD devices which belong to the different classes.

CHAPTER -2

LITERATURE REVIEW

G.Abbadessa et al suggested that DTx can be used to supplement conventional treatment for a number of neurological dysfunctions.

There are still some unresolved problems, though the lack of standardized intervention methods; the insufficient validation of digital devices in non-English languages; and the financial burden on the healthcare system.

Additionally, in less developed locations, the difficulty to reach underserved groups may be due to a lack of high-speed broadband connectivity.

Surprisingly, all of the DTx devices mentioned in this article were only accessible in English, with the exception of one ("FARMALARM®", available in Spanish).

There is no agreement on the outcome metrics, training duration/intensity, and types of exercise games that should be played to evaluate the therapeutic use of virtual reality- and video game-based telerehabilitation.

Et al Sundeep Mishra found out in his study that the use of medical equipment is deemed to be relatively safe when it has the CE Mark, which confirms that it complies with European Standards for electrical engineering. The procedure is less complicated, less expensive, and depends more on post-marketing surveillance and self-regulation (the producer is responsible). However, CE is only halfway done because each nation will still require reimbursement clearance.

In terms of FDA clearance, the 510(k) process is speedier and easier and depends on demonstrating significant equivalence. While the CE mark's quality management system review occurs before to approval, with the 510(k), it may take some time before the device is put on the market. Only after receiving 510(k) approval, sometimes even a year later, does the FDA inspect in accordance with 21 CFR 820.

CHAPTER -3

METHODOLOGY:

- The secondary study design using the analysis of the company which is globally present
- The study area is Curio Digital Therapeutics in Medical Software in Quality Assurance(QA).
- Study Duration: The duration of the study was 15th Feb to 15th May (3 months).
- Method of Data Collection and Analysis: Quantitative data was obtained through the Public Forums sites, FDA sites, and Global SaMD compliance working solution sites in which association of 510k approval and clearance is there. The analysis is done through Microsoft Excel in which the data has been followed in Statistical Graphical Representation (SGR).
- Inclusion criteria specifically designed for the Studies that include literature specifically on S AMD which complies with 510k Approval
- Exclusion Criteria was to exclude the Studies that include literature about hardware and non – medical device and which do not complies with 510k approval

CHAPTER -4

DATA ANALYSIS AND RESULT

DATA ANALYSIS

The data was analyzed based on these Protocols. Based on these protocols, the Result was generated by Microsoft Excel.

RESULTS

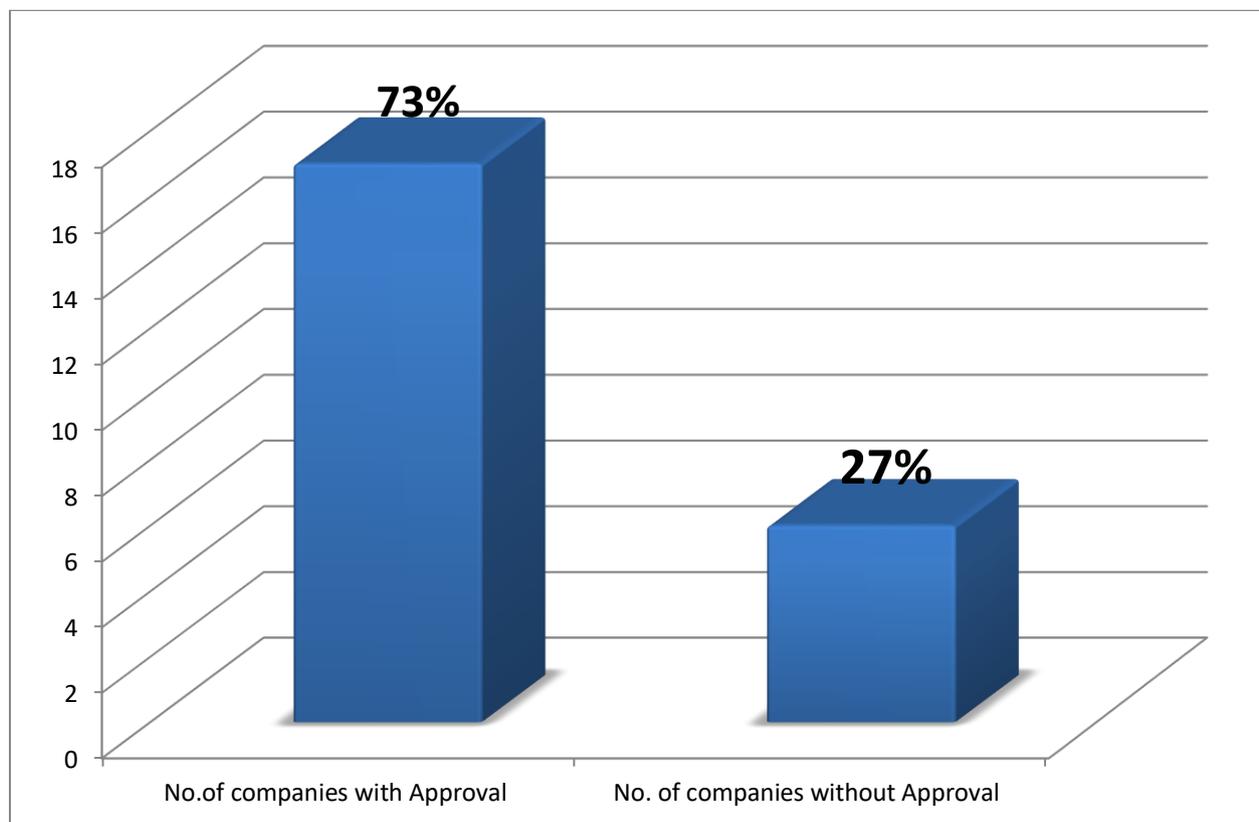


FIG: 4.1

The study reveals that there are 23 Companies Globally from which only 17(73%) of the companies have been approved for 510k approval working on Class I, II, and III products, and 6 (27%) of companies were without 510K approval. The detailed analysis also shows that those companies which have not undergone the 510k approval are also working for SaMD, in spite of being not approved or providing themselves for the clearance process.

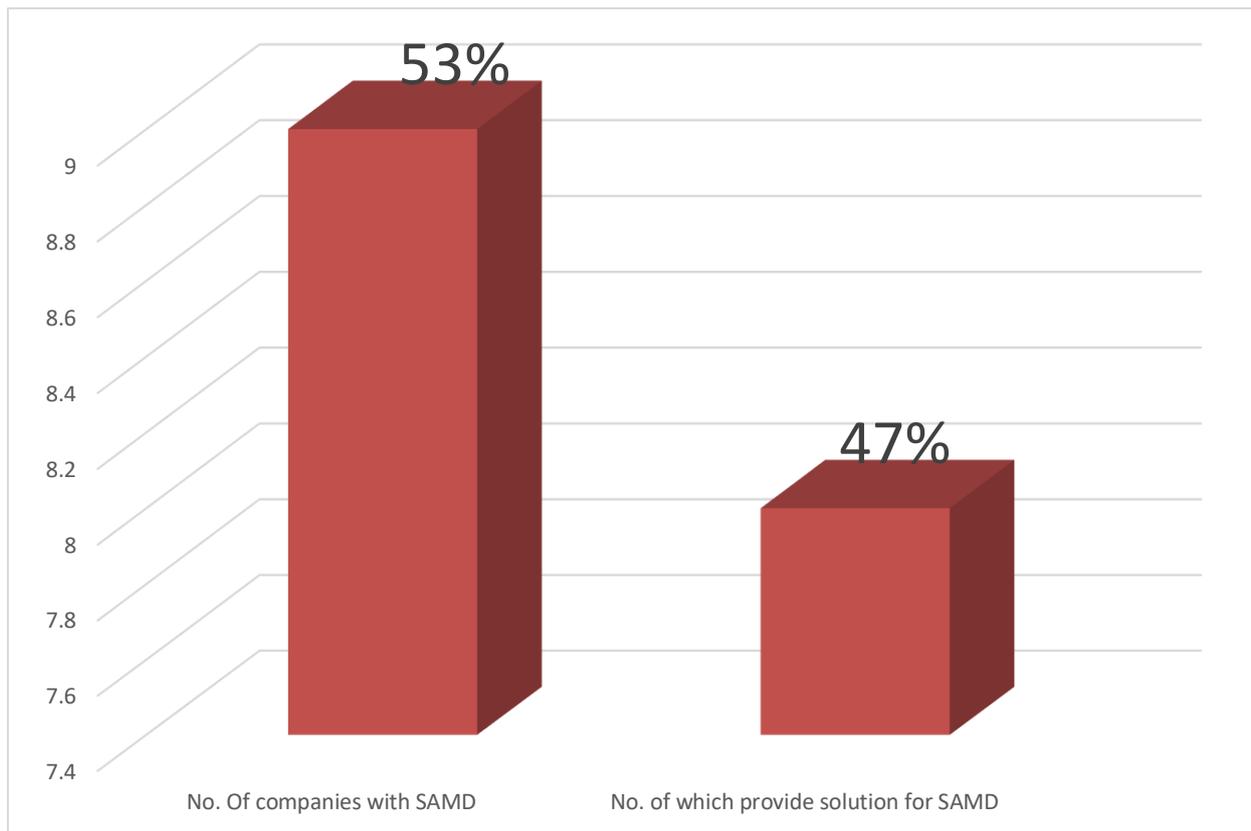


FIG: 4.2

The study revealed that among the 17 counts of the approval of 510k; the total companies which have been identified have gone undergone the approval process, from this many companies there were 8 companies that provide 510k approval and are involved in the SaMd product line but they are solution service companies that provide consultation areas, they act as service solution approach for the product to meet the regulatory compliances.

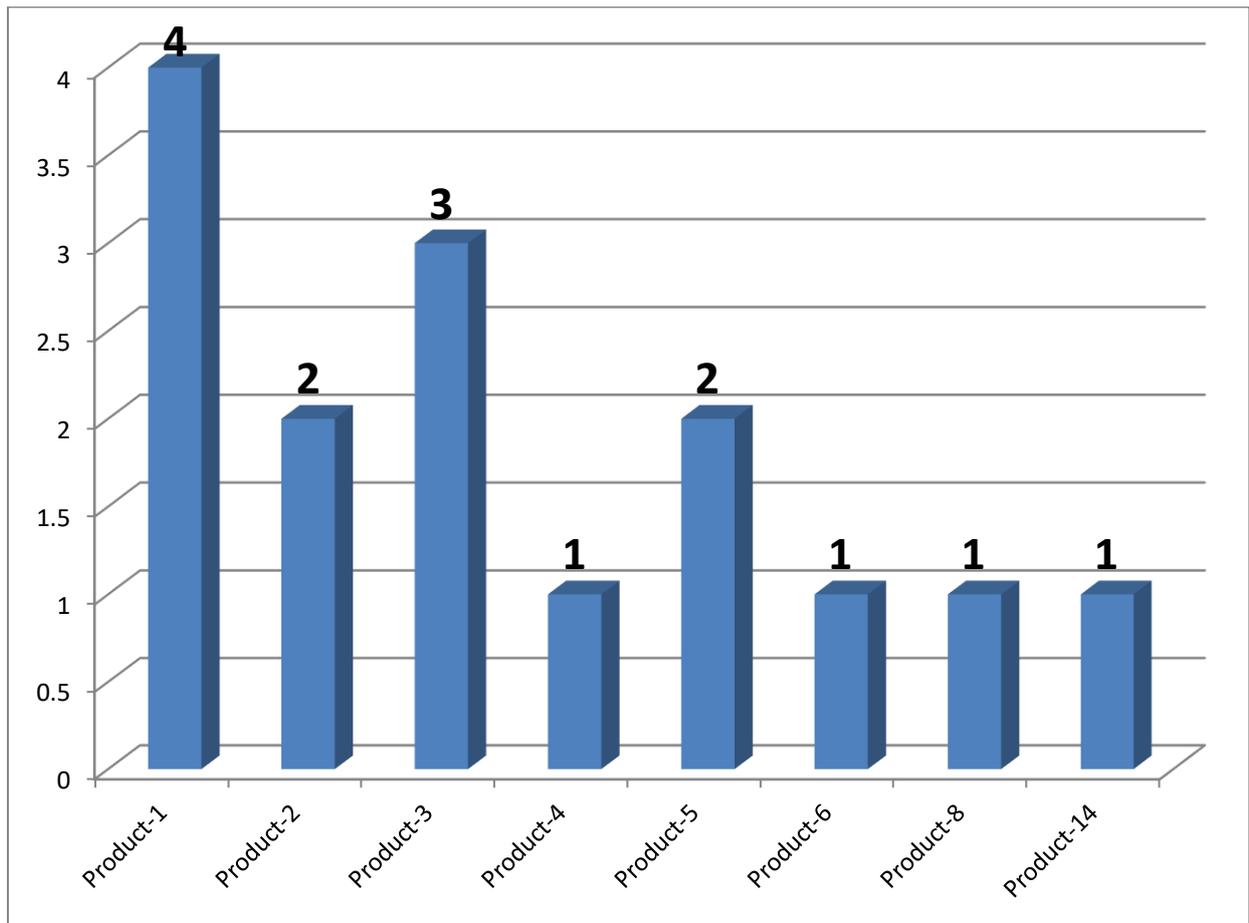


FIG: 4.3

The statistical representation of the product line on which companies are working.

The product count is representing the number of products and the Y-axis count represents how many companies are working on a particular product count.

The data includes both the product line which are 510k and not 510k approved.

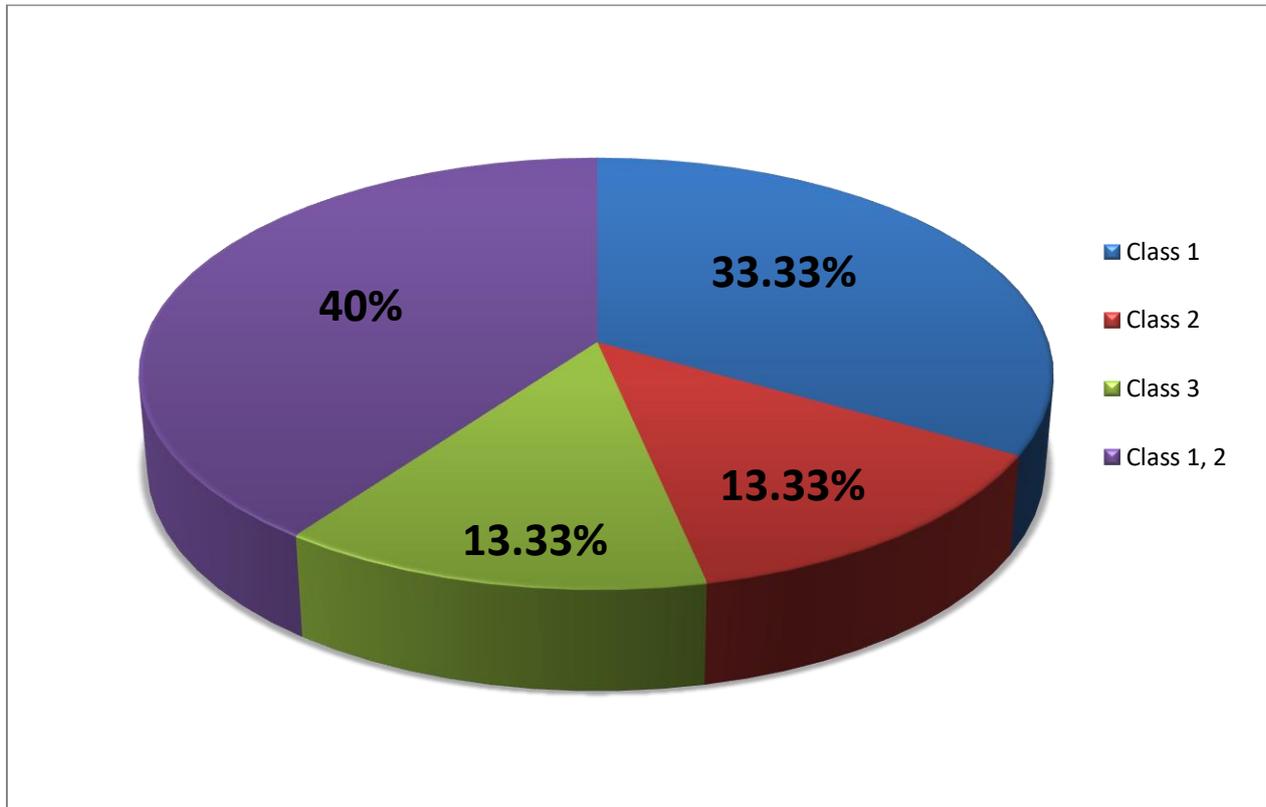


FIG : 4.4

The class I, II, and III devices in SaMD Product

The total number of companies working on the products are: 15

Companies working for Class I = 5

Companies working for Class II = 2

Companies working for Class III = 2

Companies working for class I, II = 6

The total percentage area of these different classes held by the companies are shown in the form of a Pie Chart.

WHY 510K FAILURE RATES ARE THERE IN SaMD?

A 510(k) failure refers to a situation where a medical device manufacturer submits a premarket notification, known as a 510(k) application, to the U.S. Food and Drug Administration (FDA) for clearance to market their device, but the FDA determines that the device does not meet the requirements for clearance. The 510(k) clearance process is used for moderate-risk medical devices that are substantially equivalent to devices already on the market (predicate devices).

When a 510(k) submission fails, it means that the FDA has identified deficiencies or issues with the application that prevents the device from being cleared for marketing. Reasons for 510(k) failures include:

The FDA may decide that the device in question is not sufficiently comparable to the predicate device or that the maker has not provided sufficient evidence to show significant similarity.

Insufficient testing or data: The FDA may determine that the application's data is insufficient to show the device's safety and efficacy. This can involve lacking pertinent performance data, insufficient or poorly planned clinical research, or failing to adhere to appropriate requirements.

Flaws with design or manufacturing: The FDA may reject a 510(k) application if it finds flaws with the device's design, components, or manufacturing procedures. Concerns regarding the device's dependability, quality assurance, or possible hazards to patients may fall under this category.

When a 510(k) submission is rejected, the FDA often sends the company a "Not Substantially Equivalent" (NSE) letter outlining the grounds for the rejection. In order to address the FDA's concerns, the producer can then correct the defects and resubmit the application with updated information. During the 510(k) process, it's crucial for medical device makers to collaborate closely with the FDA to make sure they adhere to all rules and present enough proof of safety and significant equivalence.

Numerous reasons were found from the studies about how FDA 510K can be failed and these were:

Inaccurate or incomplete information: A full comparison of the features of the new device and the predicate device must be included in the 510(k) submission. The data upon which this analysis is based must be accurate and comprehensive. The FDA might not be able to assess whether the new device is substantially equivalent to the predicate device if the data is lacking or erroneous.

Regulator standards not being met: Additionally, the 510(k) application must to adhere to all relevant legal criteria. Working with a trained regulatory consultant is essential to ensuring that the submission is full and in compliance with these regulations, which can be complicated and constantly changing.

Poor manufacturing techniques: The FDA could not approve the new device if it is not produced using good manufacturing techniques (GMPs). GMPs are a set of guidelines that guarantee the consistent and secure production of medical equipment

Clinical trials: In some circumstances, the FDA may demand that the maker carry out clinical trials to show the new device is safe and effective. The FDA can decide not to approve the gadget if the clinical studies are unsuccessful.

IMPORTANCE OF 510K in SaMD

The study found out what is the need for the 510k process for SaMD approval and how much importance it holds in product and regulatory compliance.

Software as a Medical Device (SaMD) approval heavily relies on the 510(k) procedure. Software that is meant to be used for medical reasons but is not a component of a real medical device is referred to as SaMD. Before SaMD may be sold in the United States, the FDA can evaluate its efficacy and safety through the 510(k) process

The following significant factors underline the significance of the 510(k) procedure for SaMD clearance:

Regulatory Compliance: The 510(k) procedure makes sure that SaMD producers abide with FDA rules. According to the Federal Food, Drug, and Cosmetic Act (FD&C Act), SaMD qualifies as a medical device. As a result, it must adhere to the same legal criteria as conventional medical devices, including receiving FDA approval.

Risk-based Classification: SaMD is categorized into various risk groups under the 510(k) procedure based on its intended use and possible effects on patient safety. SaMD can be classified as Class I, Class II, or Class III, with Class III being the greatest risk. The categorization decides how much inspection is needed throughout the clearance procedure.

Establishing significant equivalence between the SaMD and a predicate device that has been legally marketed is the main goal of the 510(k) procedure. The manufacturer must show that their SaMD has comparable performance and safety or has the same intended application and technological features as the predicate device. Using data from already-existing devices, helps to speed the review process.

The FDA evaluates the SaMD's performance statistics, clinical assessments, and risk management procedures in order to determine its safety and efficacy.

The evaluation of the SaMD's intended usage, therapeutic advantages, possible hazards, and the accuracy and dependability of the used algorithms or computational models are the main points of consideration. The SaMD's compliance with the necessary criteria for patient safety and health outcomes is ensured through this assessment.

Post-market Surveillance: SaMD must comply with post-market surveillance standards set out under the 510(k) procedure. When products are released onto the market, manufacturers must have mechanisms in place to track how well they are doing. This entails gathering and examining actual data to spot any possible hazards or problems and then taking the necessary steps to guarantee patient safety.

Market Access: SaMD producers are given permission to sell their medications in the US after successfully getting 510(k) approval. The SaMD has completed FDA evaluation and has been considered safe and effective for its intended use, as shown by this clearance, which is provided to healthcare professionals, patients, and stakeholders. It improves the manufacturer's reputation and makes market entry and acceptance easier.

Continuous Monitoring and Improvement: The 510(k) procedure encourages SaMD to be continuously monitored and improved. The software must be updated or improved as needed, and manufacturers are obligated to monitor and report any negative events as well as carry out any necessary post-market surveillance. This permits continual regulatory scrutiny and assures that SaMD is safe and efficient throughout its lifespan.

Patient safety: SaMD is essential to decisions on patient care, diagnosis, and treatment. SaMD complies with the necessary safety criteria thanks in part to the FDA's approval procedure.

The SaMD's risk profile is evaluated by the FDA, along with any potential effects on patient health and the dependability and precision of the software's algorithms.

The FDA assesses the SaMD's clinical performance and its capacity to deliver accurate and trustworthy findings through the 510(k) procedure, protecting patient safety.

The 510(k) procedure for SaMD approval is essential for establishing significant equivalence, demonstrating regulatory compliance, patient safety, and market access, and encouraging continual monitoring and improvement. Manufacturers of SaMDs may successfully traverse the regulatory environment, obtain FDA clearance, and contribute to the creation of secure and efficient software

E-solutions for the healthcare sector by following this procedure. The U.S. Food and Drug Administration's (FDA) 510(k) process is a method for getting approval to market and distribute medical devices in the country. To assure patient safety and efficacy, the FDA has particular rules and regulations that apply to SaMD.

CHAPTER -5

FINDINGS

Certification to ISO 13845 and ISO 9001: The ISO 13845 standard focuses on quality management systems for the development and production of medical devices. It offers a framework for businesses to set up and manage procedures that guarantee the regular manufacturing of secure and efficient medical equipment. The more broad quality management standard ISO 9001, on the other hand, is applicable to many different industries.

Inferring that ISO 9001 certification is a necessary or fundamental necessity for attaining ISO 13845 certification, the phrase implies that ISO 13845 comes with the ISO 9001 certification. The foundation for a quality management system is laid forth by ISO 9001, and ISO 13845 adds to that foundation with additional specifications unique to the medical device sector. When these qualifications are combined to demonstrate an organization's commitment to quality and compliance in the design and manufacture of medical devices.

CE Marking and 510(k) Certification: For items sold inside the European Economic Area (EEA), CE Marking is a certification mark showing compliance with health, safety, and environmental protection criteria. It denotes compliance with relevant European Union (EU) directives for the goods. According to the statement, the certification procedure for getting a 510(k) clearance heavily relies on the CE Mark.

Medical device marketing and sales in the United States are subject to the country-specific 510(k) approval. Although it has no direct connection to the 510(k) procedure, the CE Mark may be very helpful in proving that a product complies with particular rules and specifications.

By lowering the amount of duplicate testing and documentation required for 510(k) clearance, having a CE Mark can give the FDA some comfort that the medical device complies with pertinent European standards.

Global Market Trend Analysis: According to the claim, SaMD (Software as a Medical Device) is expected to command the market with a 38 percent share. But according to earlier research, SaMD's market share was only 1.86 percent.

This suggests that, based on the trend analysis, SaMD's market share is anticipated to expand significantly. Software for medical applications is referred to as SaMD, and the sector's expansion is probably being fueled by the growing usage of digital health technology and remote patient monitoring systems.

The difference between the former market share and the anticipated domination points to a significant rise in the market's demand for and use of SaMD.

Production and Registration of SaMD in India: According to the claim, SaMD is mostly produced in India. It does, however, state that the devices are still being registered.

This shows that even though India is a major player in SaMD manufacture, the products have not yet received complete registration and marketing and distribution approval. Before approving the SaMD for the market, regulatory authorities examine the SaMD's safety, quality, and efficacy as part of the registration procedure. It suggests that even if India has the ability to produce, there may be some regulatory obstacles or delays in gaining the required registrations, dominating Market and Regulatory Compliance: According to the statement, SaMD has a dominating market in North America, but other regulatory compliances are more prevalent in the Asian-specific area.

This suggests that SaMD is highly demanded and widely used in North America, which is most likely to relate to the United States and Canada. On the other hand, the Asian market, which may include nations like China, Japan, and India, presents unique hurdles with regard to regulatory compliance. The diverse approval procedures, standards, and requirements for SaMD in various geographic locations may be the cause of these regulatory variations, which would call for manufacturers doing business in these markets to develop specialized regulatory strategies and compliance programs.

CHAPTER -6

CONCLUSIONS AND SUGGESTION

Latent Flow and 510(k) Submission Failure: According to the statement, "latent flow" is to blame for 510(k) submission failures. But it's difficult to understand what "latent flow" means without more information. It can suggest a fundamental problem or error with the product or the submission procedure that emerges during the 510(k) review and prevents the application from being approved. It is difficult to explain this particular subject in great depth without more details.

Regulatory Compliance with ISO 9001, 13845, and CE Mark: The declaration emphasizes how important regulatory compliance is in submitting for the CE Mark, ISO 9001, and ISO 13845. These certificates and insignia serve as proof that certain rules and regulations have been followed.

The CE Mark denotes compliance with EU regulations for environmental, health, and safety protection. Manufacturers must prove conformity with pertinent EU directives unique to the medical device industry in order to receive the CE Mark. One of the most important factors in earning the CE Mark certification is regulatory compliance.

A generic quality management standard that is relevant to many sectors is ISO 9001. An organization has put in place efficient quality management systems if it complies with ISO 9001.

ISO 13845: The quality management systems used in the development and production of medical devices are the subject of ISO 13845. It improves upon ISO 9001 and includes new specifications unique to the medical device sector.

Organisations must follow the relevant standards and prove that they have complied with all applicable criteria in order to receive these certificates. Regulatory compliance is a crucial component in getting these certifications and entails meeting specified quality and safety criteria.

Devices Certification by Statutory Body and Regulatory Differences: The statement notes that while each nation has a different regulatory body, the devices still need to be certified by the statutory authority.

The term "statutory body" in the context of medical devices often refers to the government or regulatory body in charge of licensing and certifying medical devices for entrance onto the market. The phrase implies that although certification of the devices is necessary, the precise procedure and regulatory body may vary by nation.

This emphasizes how crucial it is to comprehend and adhere to the unique regulatory standards of each nation or area where the devices will be distributed. To guarantee compliance with local legislation, manufacturers must navigate the regulatory environment and engage with the proper regulatory agencies to secure the required certifications and approvals.

Strengths of the Research Study: According to the claim, the research study's strength was the accessibility of worldwide SaMD data. However, since the 510(k) regulatory information only applies to the North American region, it is necessary to investigate other regulatory compliances for the same reasons.

SUGGESTION

It was suggested to imply within the research that extensive worldwide data on SaMD may be accessed and analyzed for the research investigation. The study's attention to 510(k) regulatory data, however, is restricted to North America, which includes the United States. Therefore, more investigation and study of pertinent regulatory frameworks and procedures would be required to have a more comprehensive grasp of the regulatory requirements for SaMD in various areas or nations.

It is crucial to think about and research the particular rules and compliance standards that are relevant in various locations throughout the world in order to properly understand the regulatory environment and needs for SaMD.

As the organization's information can't be revealed and it is a propriety right that cannot be breached out so it is to be found on the Indian Regulatory compliances as the India is the largest producer of SaMD devices.

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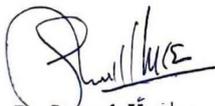
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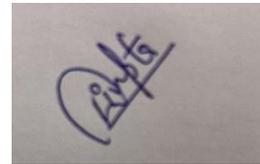
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