

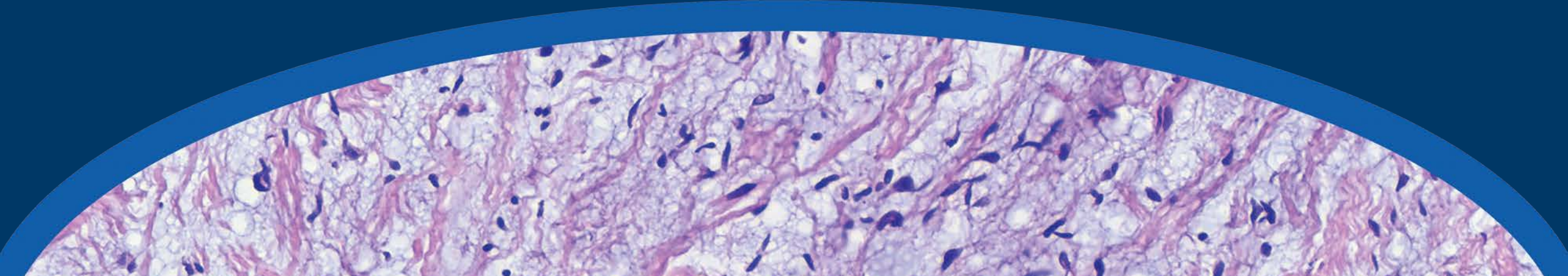


Pathology Innovation Collaborative Community (PICC)
Annual Meeting 2023



Unlocking the Potential of Digital Pathology and AI through Regulatory Science

Le Méridien Arlington
Day 1: June 27, 2023

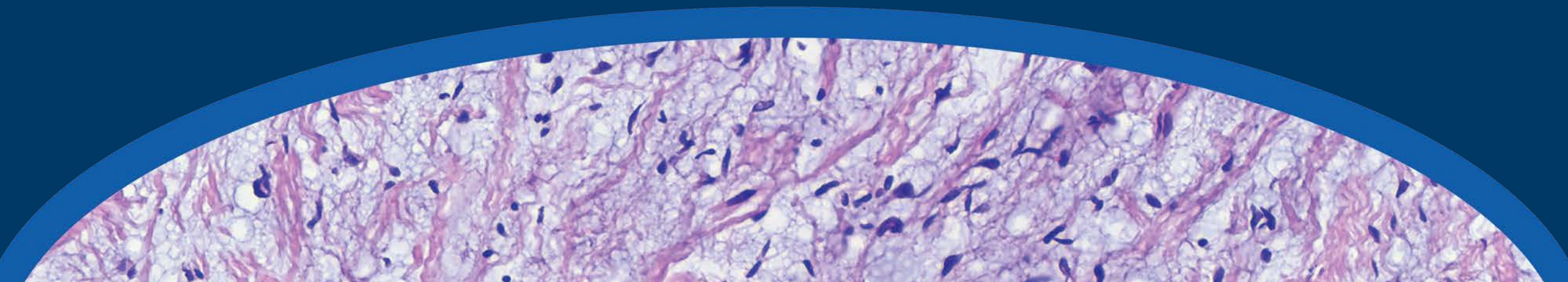




Spread the message!

LinkedIn: @mdic

**#Plcc #Cancer #Oncology #MedTech
#Innovation #patientsafety #regulation#FDA #biomarker
#oncology #digitalpathology #AI #CLIA #quality #technology**

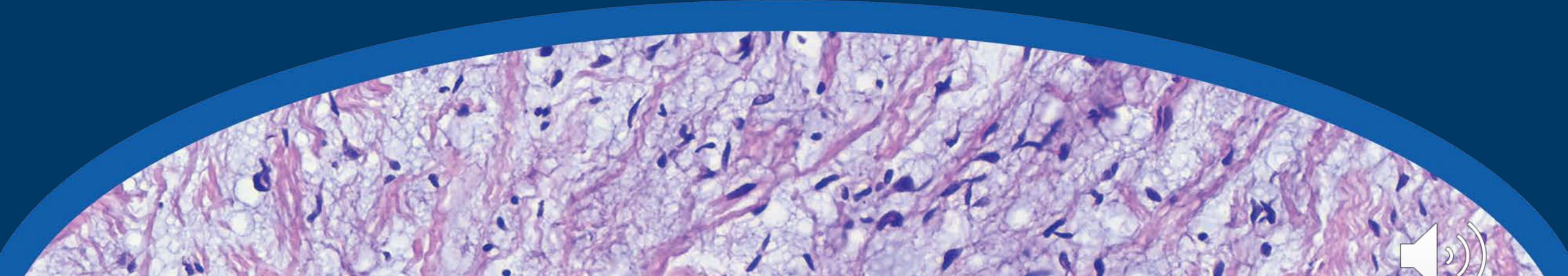




Welcome Remarks & Overview of MDIC

Andy Fish

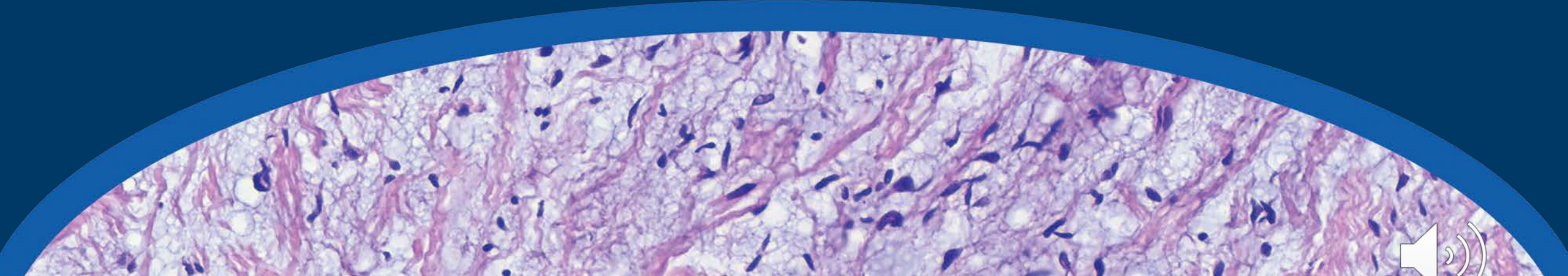
President & CEO, MDIC





Welcome Remarks & Overview of Plcc

Jochen K. Lennerz, M.D., Ph.D.
Medical Director, Center for Integrated Diagnostics, MGH
&
Associate Professor, Harvard Medical School





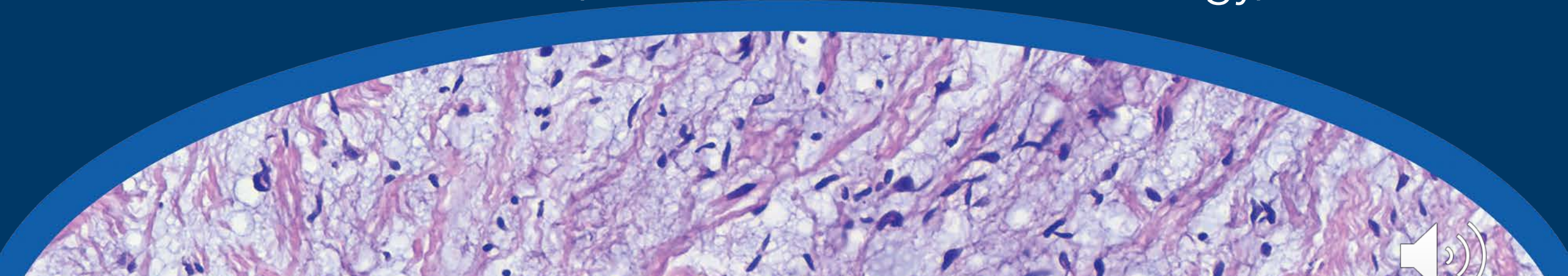


Session 1: Updates from Organizations and Initiatives related to DP/AI

Moderated by:

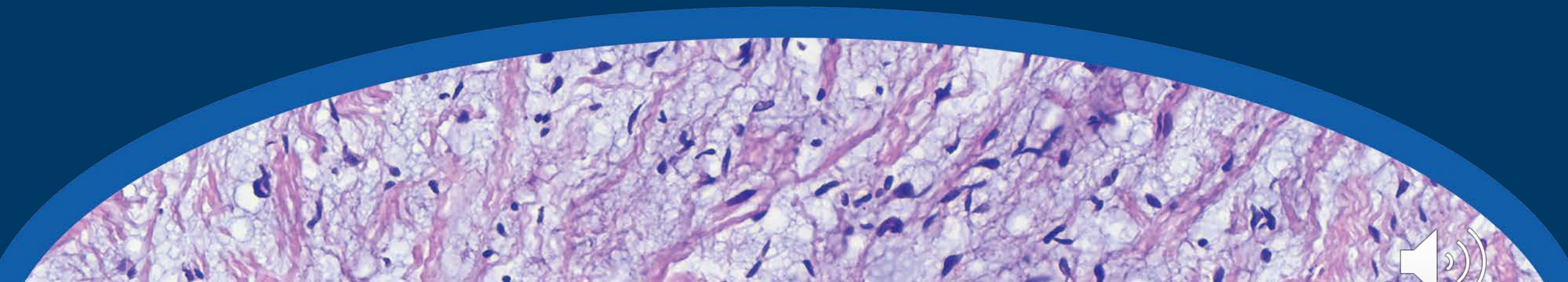
Joseph R Sapiente

Vice President, Clinical Science & Technology, MDIC





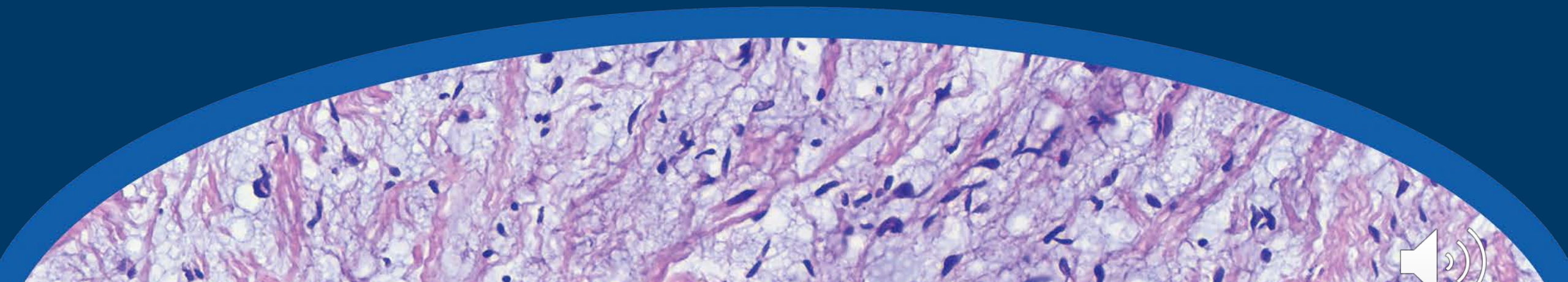
Session 1: Updates from Organizations and Initiatives related to DP/AI





College of American Pathology (CAP): Pathology Innovation and Data Science

M. E. de Baca (Doc), MD
Sysmex VP for Medical Affairs &
CAP Board of Governors





COLLEGE of AMERICAN
PATHOLOGISTS

CAP Update:

SHIELD

&

Council on Informatics and
Pathology Innovation

M. E. de Baca, MD

June 27 2023

SHIELD

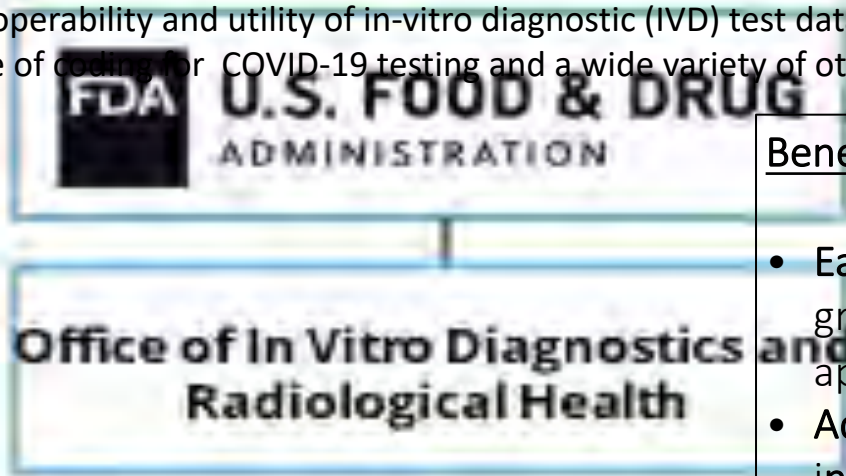
FDA SHIELD OBJECTIVES

The Food and Drug Administration (FDA) **Systemic Harmonization and Interoperability Enhancement for Laboratory Data (SHIELD)** is a public-private partnership that was assembled with a singular focus on improving the interoperability and utility of in-vitro diagnostic (IVD) test data. SHIELD provides the authoritative source of coding for COVID-19 testing and a wide variety of other assays.

SHIELD

FDA SHIELD OBJECTIVES

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SHIELD:
laboratory data interoperability *Describes the same test the same way, every time*

Benefits of FDA SHIELD

- Eases burden for stakeholder groups through unified approach
- Advances standards based information exchange across labs and healthcare institutions
- Lays foundation for improved semantic interoperability
 - Implementing infrastructure that harmonizes how lab data standards are applied practically to IVD testing

Issue
Lack of standardization...
IVD/LAW

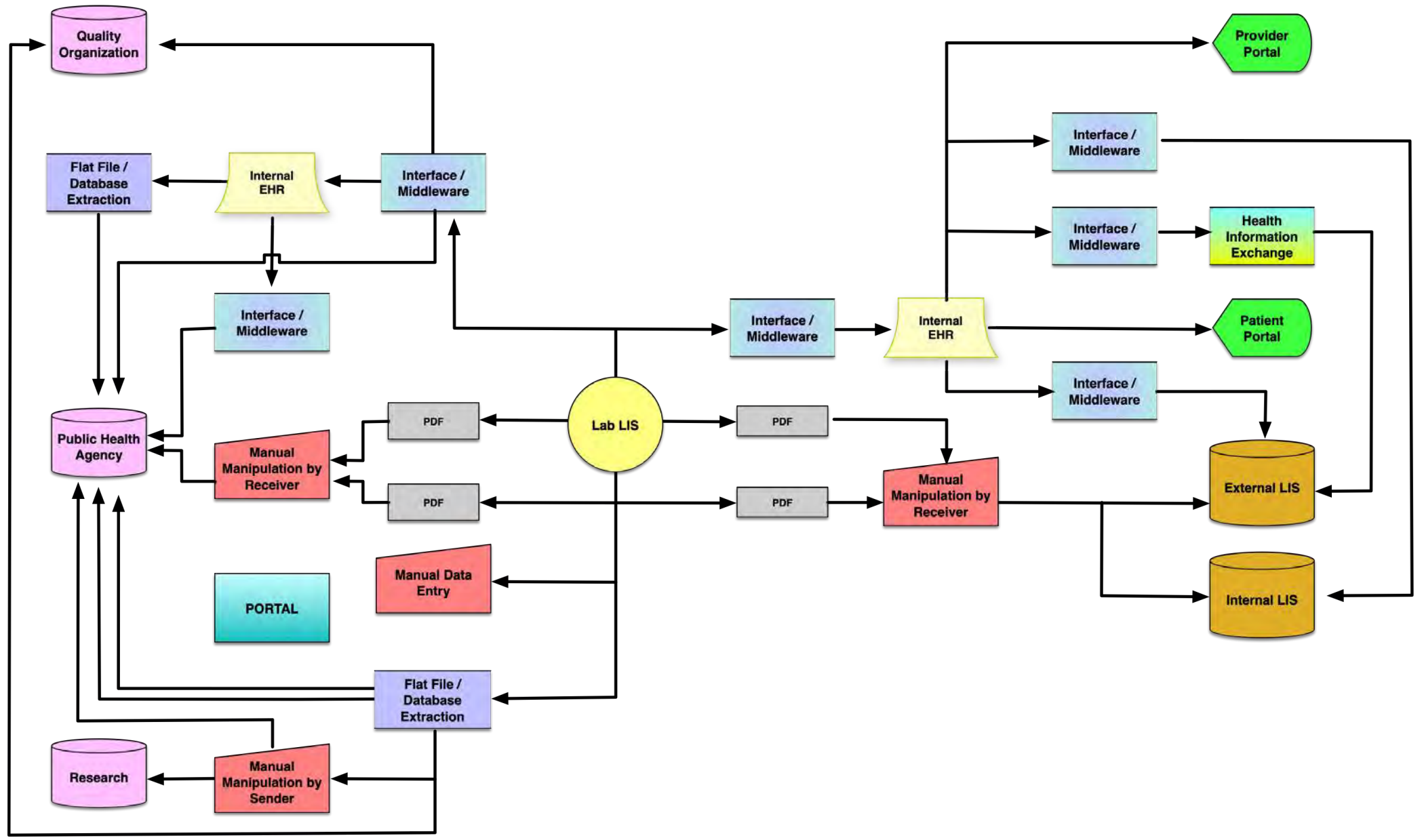
Approach
Define and implement...
data...
FDA

Impact
SHIELD is critical...
response strategy...
17

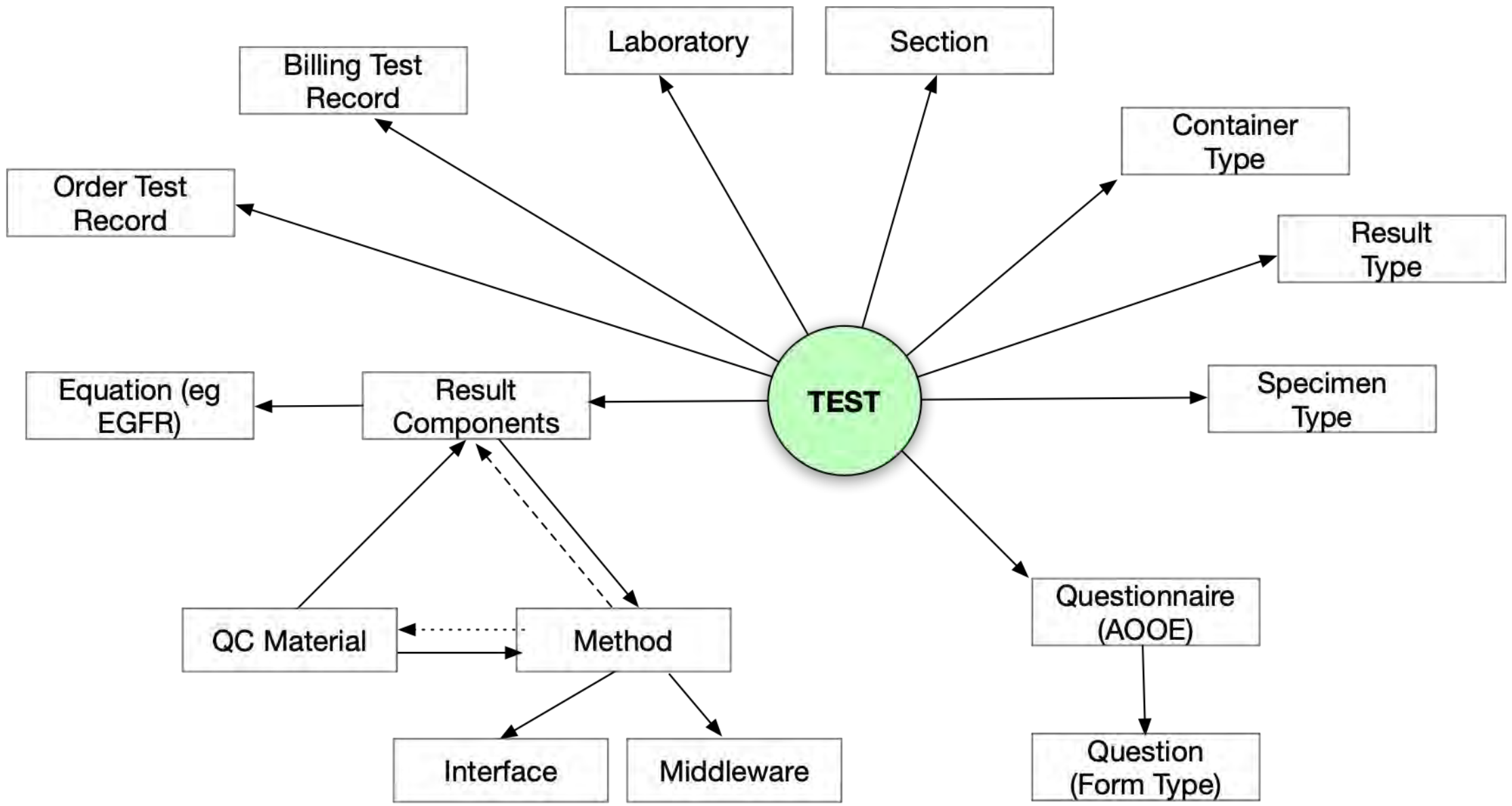
CAP:

We proposed the strategic design of a quality assurance program and supporting infrastructure to support in vitro diagnostic (IVD) test result data quality.

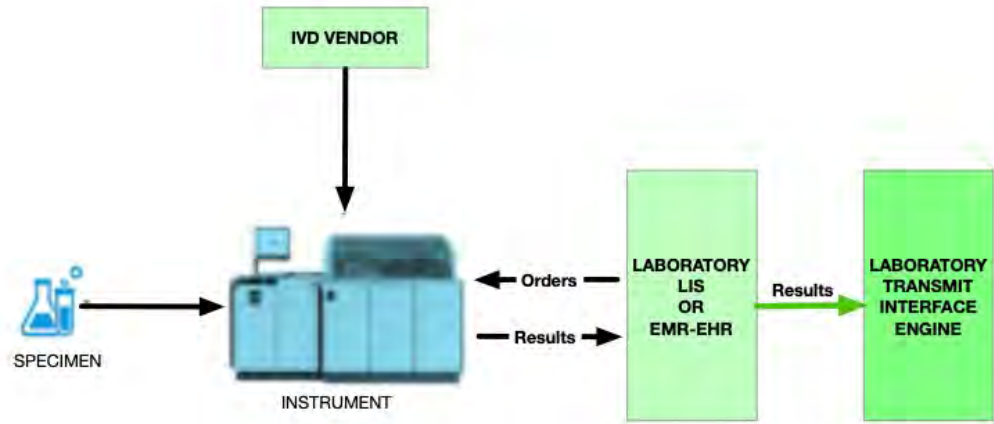
Current State of Laboratory Data



Current State of Laboratory Data

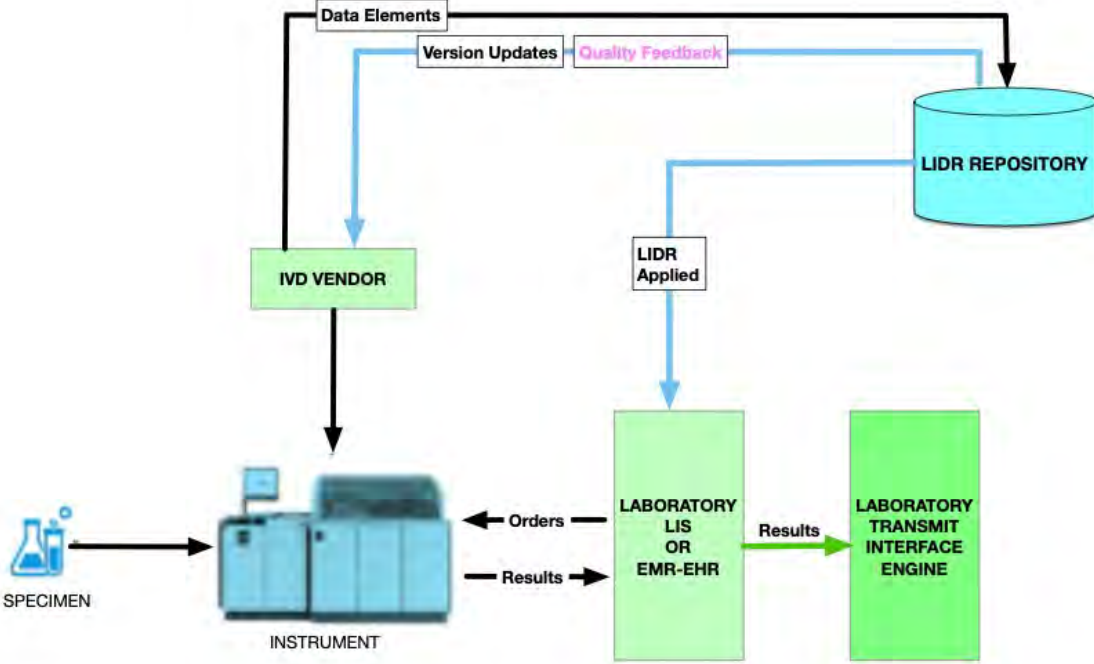


FUTURE STATE: DATA FLOW INFRASTRUCTURE



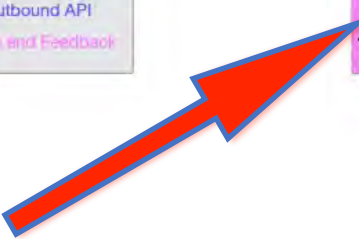
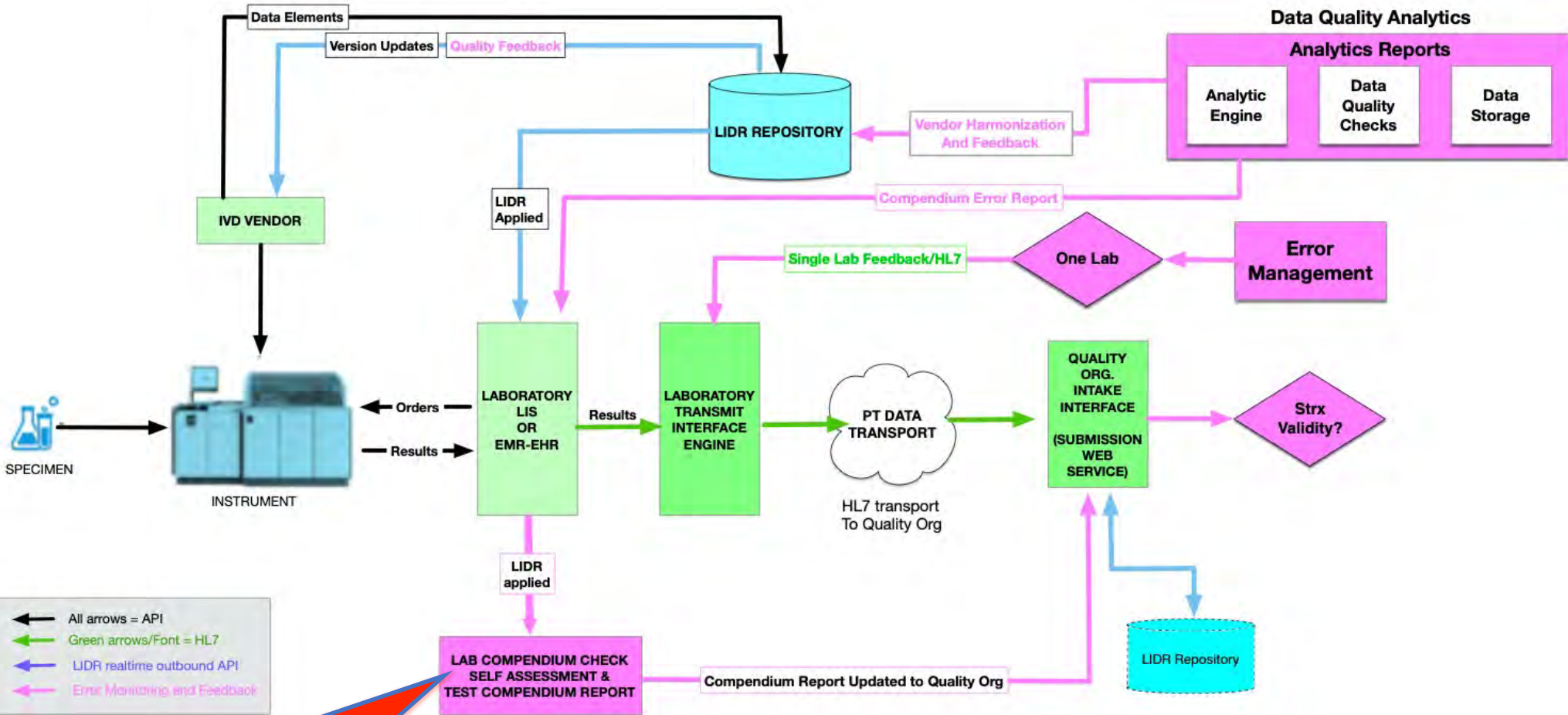
← All arrows = API
← Green arrows/Font = HL7

FUTURE STATE: DATA FLOW INFRASTRUCTURE

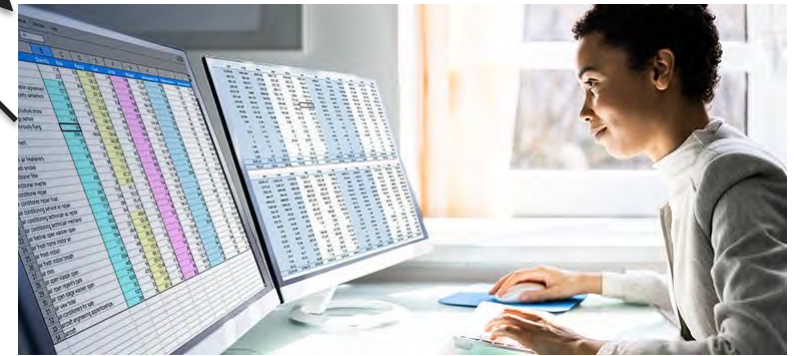
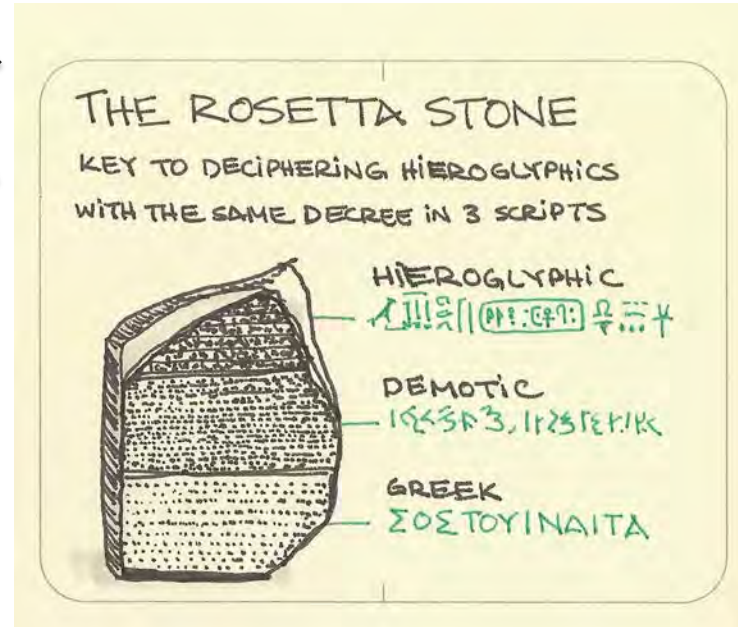


← All arrows = API
 ← Green arrows/Font = HL7
 ← LIDR realtime outbound API

FUTURE STATE: DATA FLOW INFRASTRUCTURE



Self Assessment Toolkit

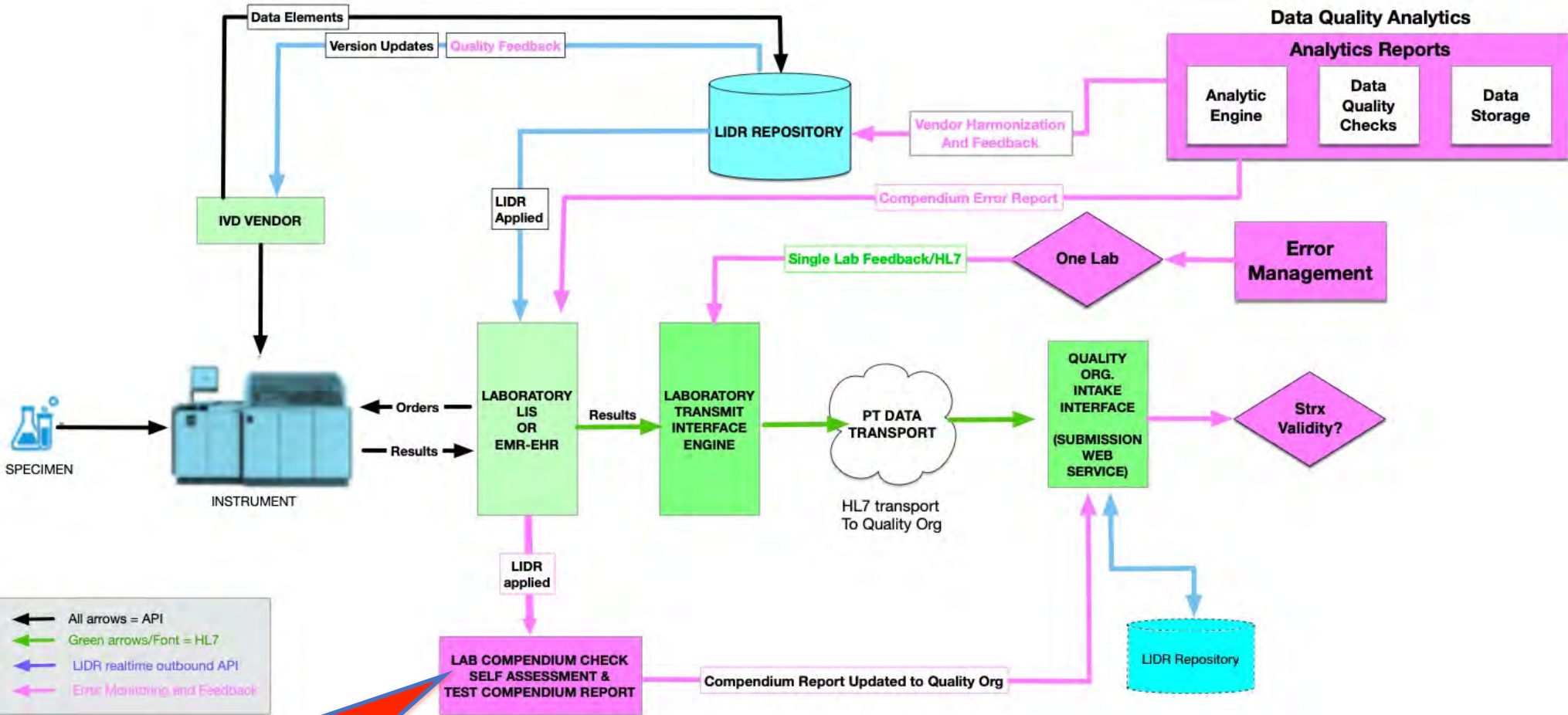


Laboratory Personnel

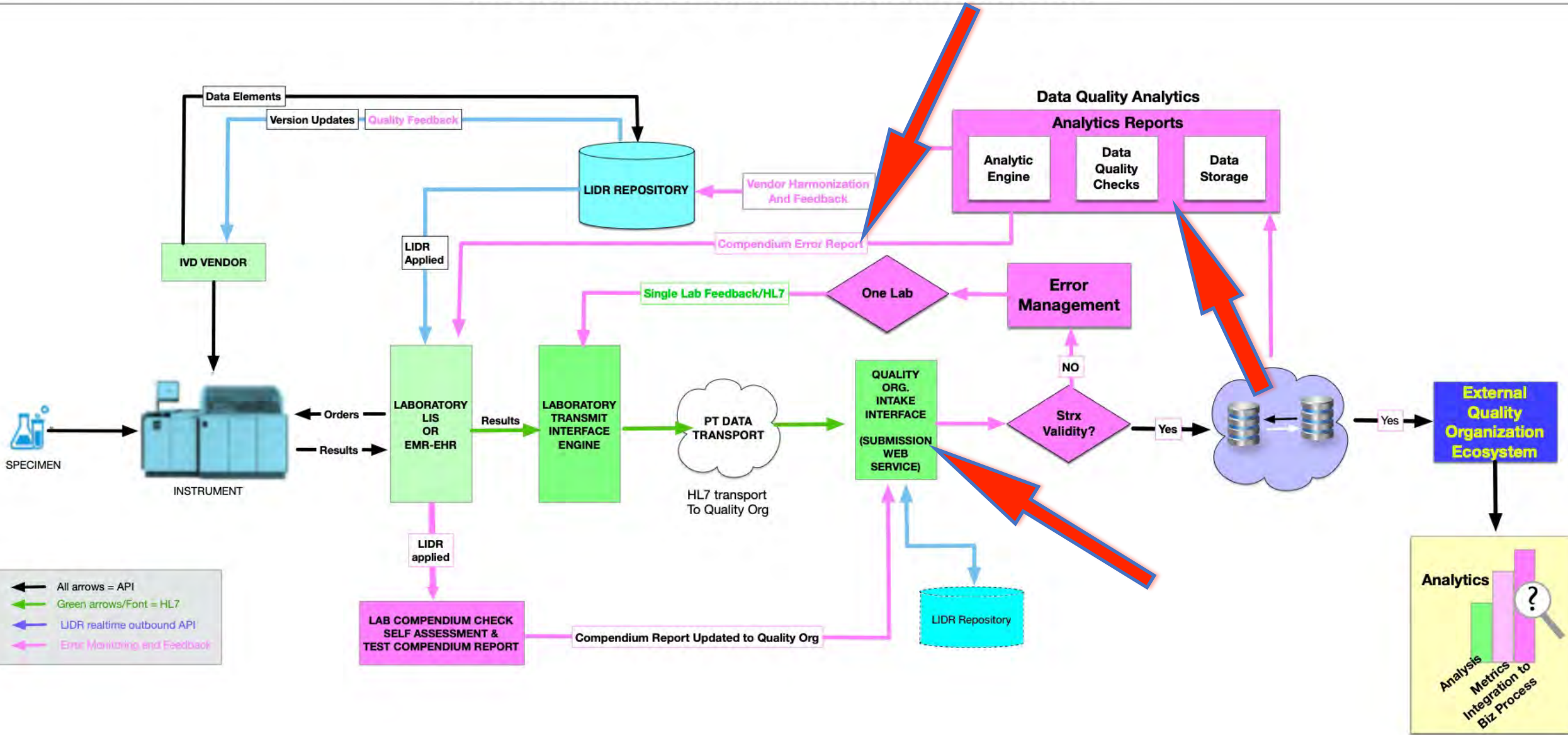
LIS/EHR Templates

LIS Analysts

FUTURE STATE: DATA FLOW INFRASTRUCTURE



FUTURE STATE: DATA FLOW INFRASTRUCTURE



Laboratory Data Quality External Assessment

Auswandererhallen der Hamburg-Amerika Linie, Hamburg.

Sanierungskarte.

Hapag

Befördernde Linie: _____

Akte No. 3955

Name des Passagiers: Focht, Heinrich

Ankunftsdatum: 14/7 22

1. Desinfektion: 15. JUL 1922 2. Desinfektion: _____

Tag der Impfung: _____

(Stempel des amerikanischen Arztes.)

W. H. b. 6. 22. 20 000.

HAMBURG-AMERIKA LINIE JOINT SERVICE WITH

UNITED AMERICAN LINES (INCORPORATED) Inspection Card

(Third Class Passenger)
(FROM EASTERN EUROPE.)

Port of departure Hamburg Date of Departure 27. JULI 1922

Name of ship Mount Clay

Name of Immigrant { Emerk Last residence { Standras
Focht

Inspected and passed at	Passed at quarantine, port of	Passed by Immigration Bureau
	_____ U. S. port of _____	_____
Seal or Stamp of Consular or Medical Officer	(Date)	(Date)

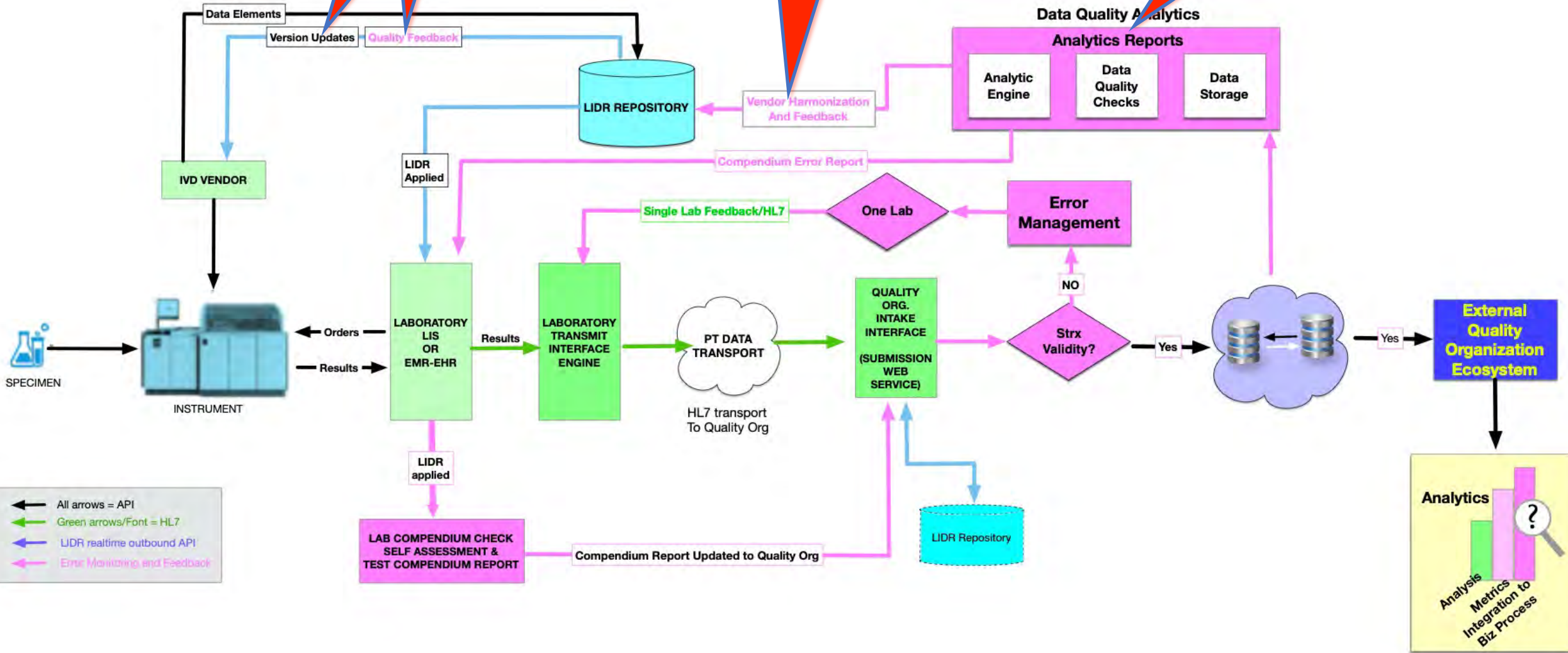
(The following to be filled in by ship's surgeon or agent prior to or after embarkation)

Ship's list or manifest 5 No. on ship's list or manifest 8

Berth No.	Steamship Inspection	1st day	To be punched by ship's surgeon at daily inspection
_____	_____	1 2 3 4 5 6 7 8 9 10 11 12 13 14	_____

H. G. Sch. 30. 3. 22. 5000.

FUTURE STATE: DATA FLOW INFRASTRUCTURE



... Next Steps...

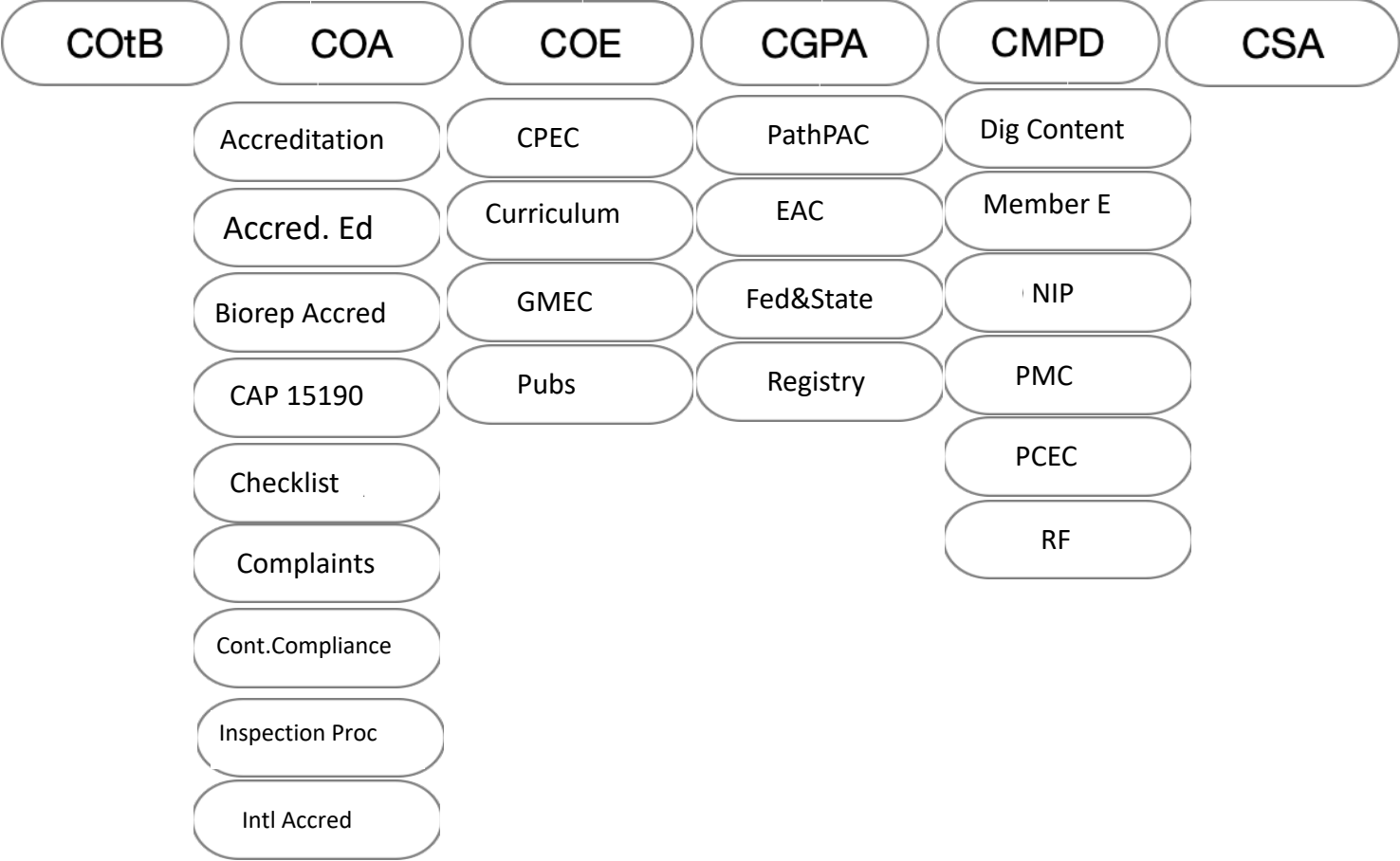
Year 2 Approved Objectives

1. Laboratory Coding Transmission Feasibility
2. Test Menu Coding Education & Training
3. Analysis Normal Form Clinical Narrative
Development and Roundtrip Testing

Whew!

... (almost) Complete Pivot...

BOG



BOG

COTB

COA

COE

CGPA

CMPD

CSA

CSA

AI

Bylaws

Compens

Election

Nomin.

Audit

Exec

Finance

Invest

DEI

ITLC

Info/ET

Chem

Heme

Mol/Gen

AP

Lab Gen

Center

DCPC

Accuracy

DI/Flow

Bchem/Mol

Cancer

Standards

Informatics

ClinChem

Hem/ClinM

Cytog

Autopsy

POC

PERT

Instrument

Hpath

Histocomp

Histotech

QualPract

Toxico

Repro

Micro

Cytopath

H/Thromb

MolOnc

Forensic

Tr/Aph/Cel

PHC

IHC

GenMed

Neuro

SurgPath

BOG

CIPI

AI

Cancer

Dig/Comp

Informatics

PERT

BOG

CIPI

AI

Cancer

Dig/Comp

Informatics

PERT







COLLEGE of AMERICAN
PATHOLOGISTS

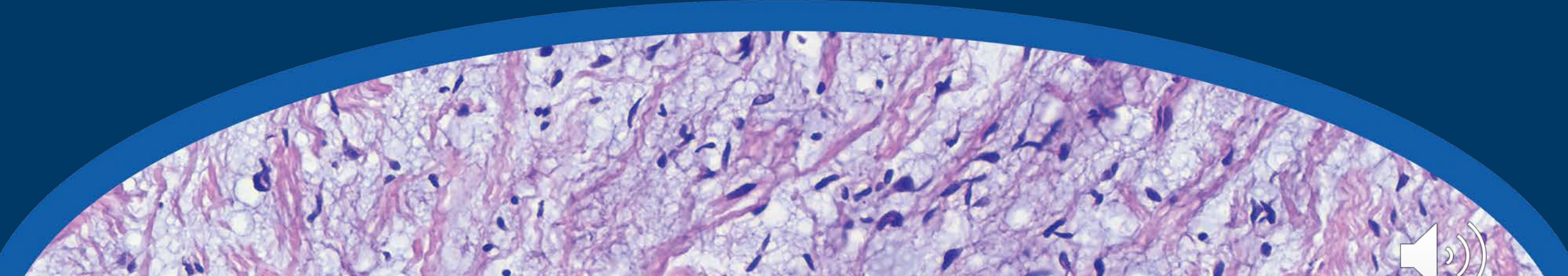


Digital Pathology Association (DPA) & DPA Foundation: Current scope of the work

Esther Abels

BioMedical Regulatory Health Science Expert

SolarisRTC LLC





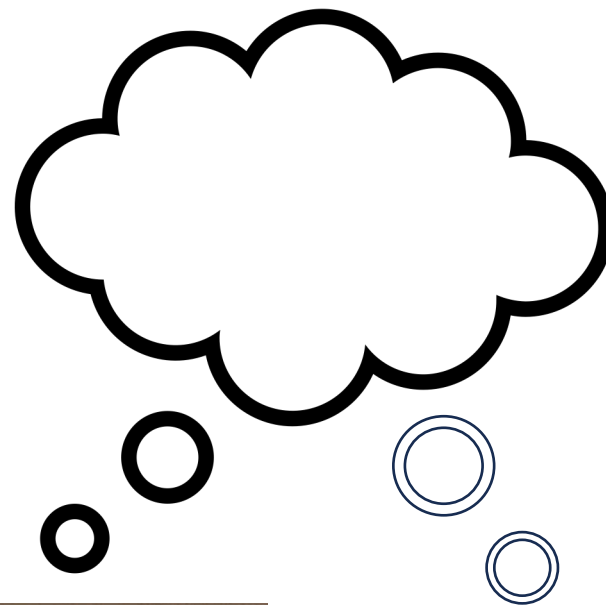


DPA and DPA Foundation

What do we do

?

?



?

?

Digital Pathology

Growth Opportunities



Precision medicine is rapidly changing



Budget, reimbursement and workforce are decreasing



Demand for personal approaches is growing



Increasing need for targeted Dx and Tx



Tx and Dx Paths need to be shortened



Acceleration through efficiency gains and showing effectiveness early on is needed

DIGITAL
PATHOLOGY



ASSOCIATION



Mission: facilitate awareness, education and adoption of digital pathology and AI applications in healthcare and life sciences.



DPA fosters an exchange of ideas helping members understand, navigate, and influence the future of pathology.



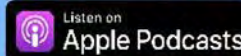
Join our community & connect with **3,000+** digital pathology professionals!

digitalpathologyassociation.org



Beyond the Scope

a podcast focusing on the hot topics in digital pathology



DPA COLLABORATE

The online community for members to connect, innovate, and learn.

Share ideas, pose questions, and network with your peers

LOG IN

DIGITAL ANATOMIC PATHOLOGY ACADEMY (DAPA)

WSI EDUCATIONAL PLATFORM PROVIDED BY THE DPA FOR ITS MEMBERS

Cloud-based platform provides annotated digital slides with diagnosis and relevant information of morphology and ancillary testing

MEMBER LOGIN

PATHOLOGY
VISIONS **23**

IGNITING DIGITAL
PATHOLOGY
TRANSFORMATION

OCT 29-31 | HYATT REGENCY | ORLANDO, FL

Going Global



Implementation: need for open agnostic digital platforms, understand and share of success



Consumers: knowing how to apply and actionable insights; reference sites



Serving Patients: Delivery of Care, share use cases, reimbursements, best practices, education



Footprint: Platform is to be integrated easily from research into clinic enabling easy integration of AI tools



General principles, harmonization, guidelines and connectathons

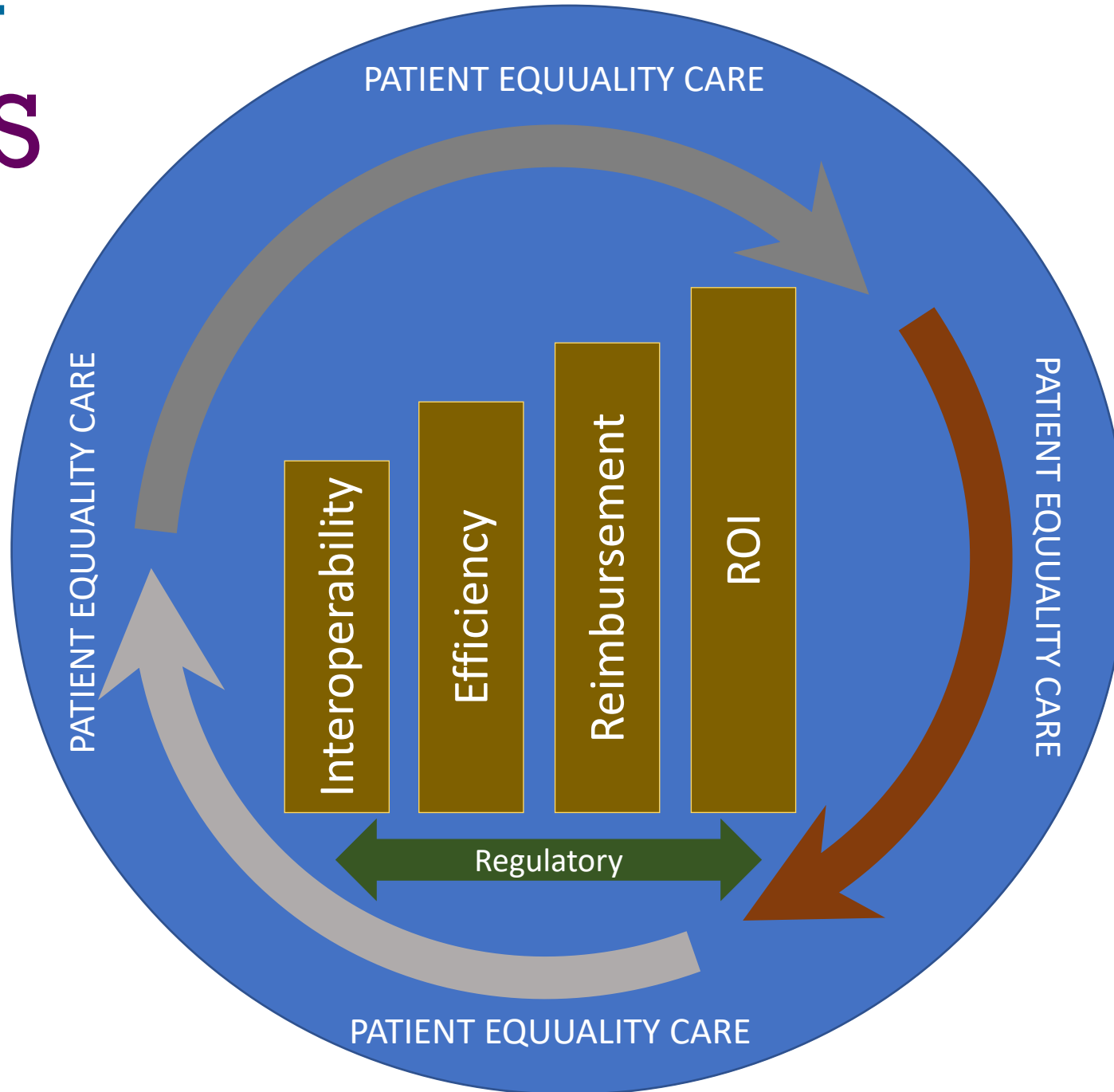
501(c)(3) organization established to raise philanthropic support to help realize the promise of digital pathology.

Our Vision: To bring digital pathology enabled precision medicine to every patient.

Our MISSION: Accelerate adoption of digital pathology to improve patient outcomes globally.



Synergy of DRIVERS



A photograph of a doctor in a white lab coat and a dark face mask examining a patient's arm. The patient is wearing a striped shirt. The background is a blurred clinical setting. The entire image is overlaid with a semi-transparent purple filter.

Digital Pathology Effectiveness Study

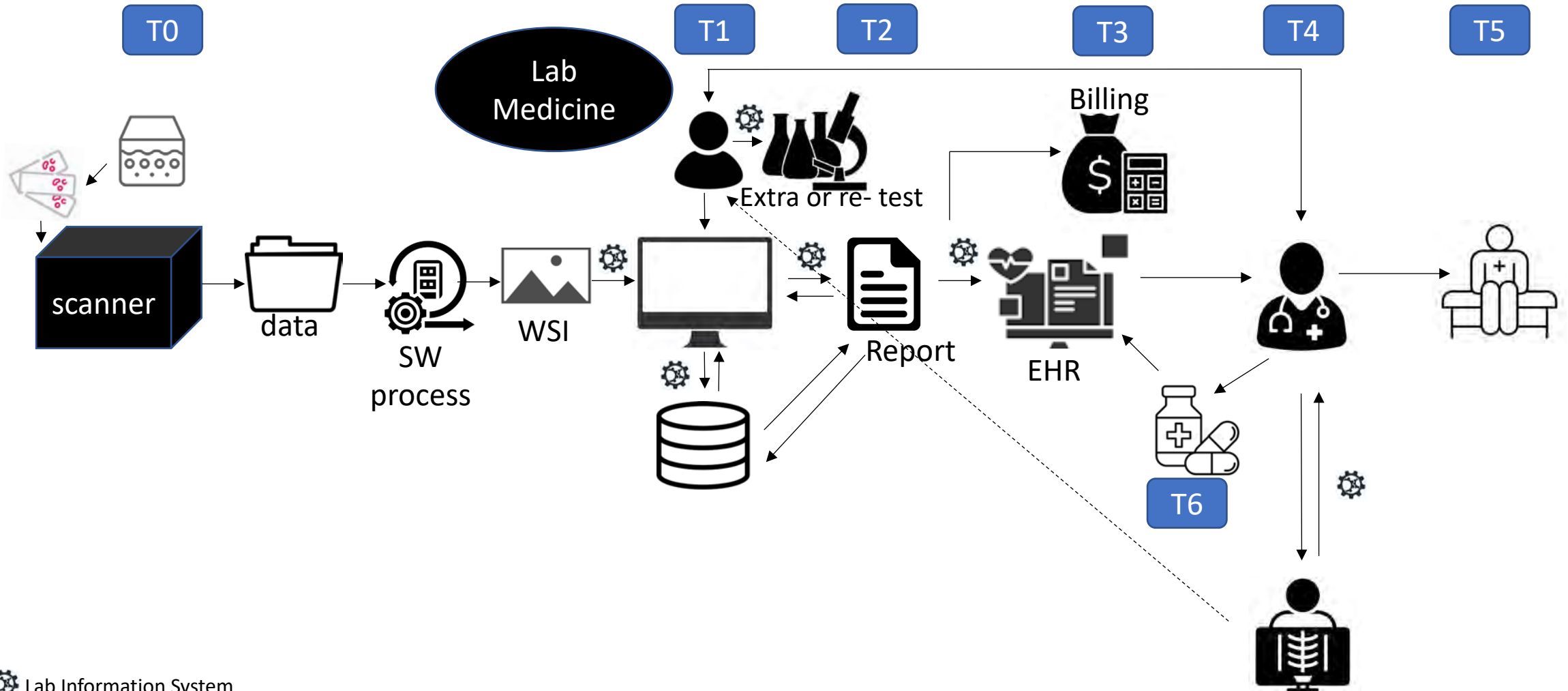
PURPOSE:

Document the impacts of adopting digital pathology for both patients and providers across a range of practice settings and community types.

ROADMAP

Timelines	Deliverables
Year 1	Effectiveness Study results Market Insights Optimization Stepping stone to unlock AI
Year 3	Best practices, Guidelines AI study driving for Regulatory Clarity, CPT codes, ROI Interoperability AI CPT application
Year 5	CPT Valuation Investigator Funded study Data as asset
>5yrs	Cyclic

Digital Pathology Performance EFFECTIVENES STUDY





KEEP
CALM
AND
GO DIGITAL

THANK YOU

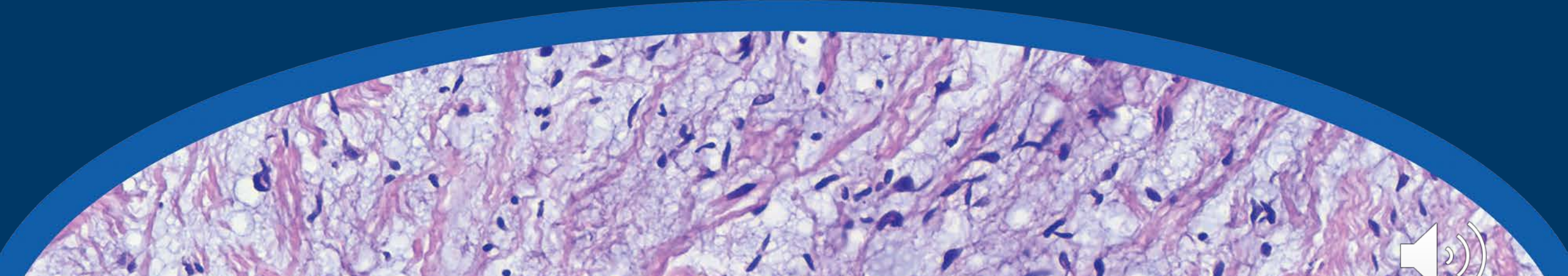




Association for Pathology Informatics (API) : Pathology Informatics – A Field or a New Practice?

Ji-Yeon Kim

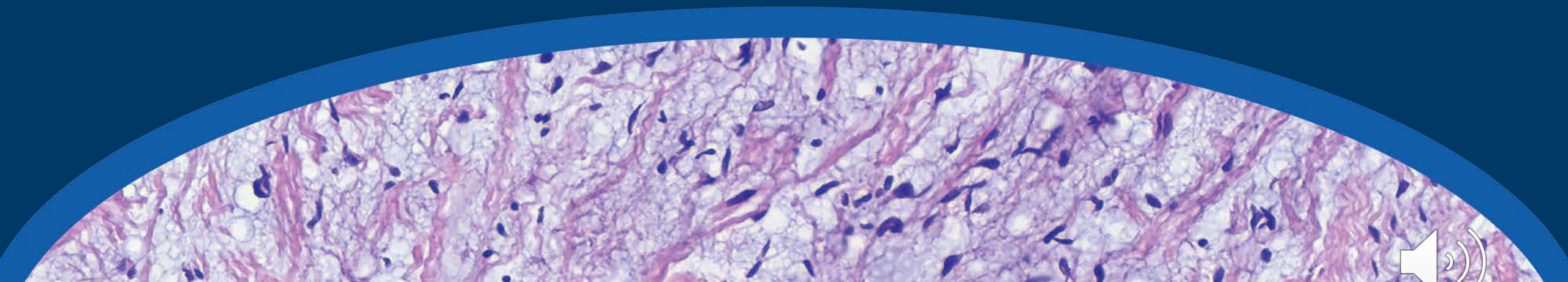
Physician Director, Lab Informatics
Kaiser Permanente





American Clinical Laboratory Association (ACLA)

Susan Van Meter
President, ACLA

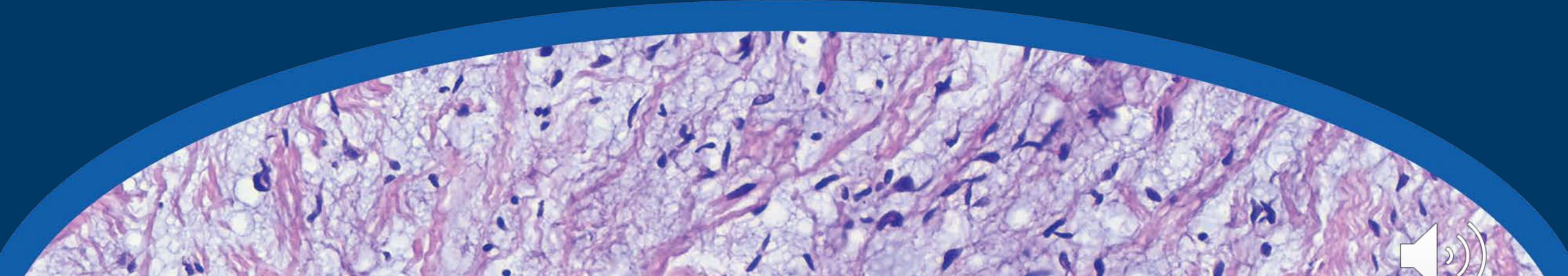




Association of Directors of Anatomic and Surgical Pathology (ADASP)

Alexandra Kalof, MD

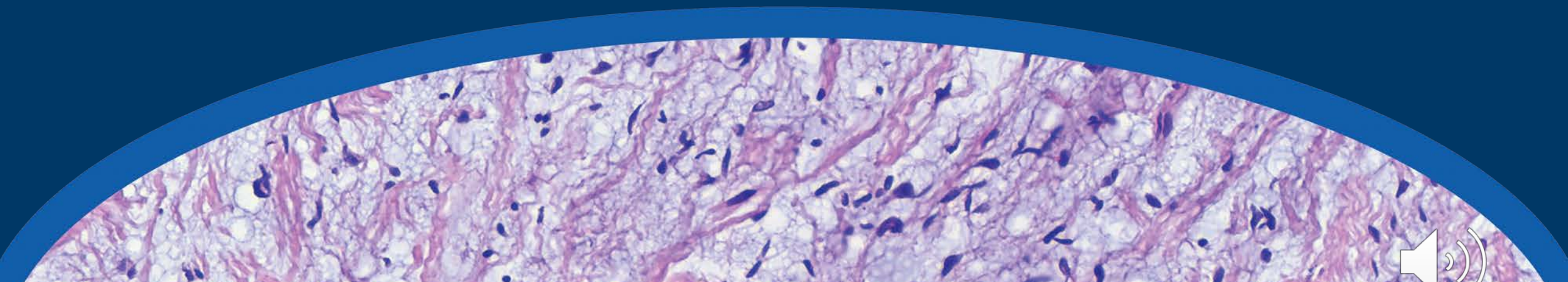
Division Chief, CLIA Laboratory & Director of Anatomic Pathology
University of Vermont Medical Center





Session 1: Updates from Organizations and Initiatives related to DP/AI

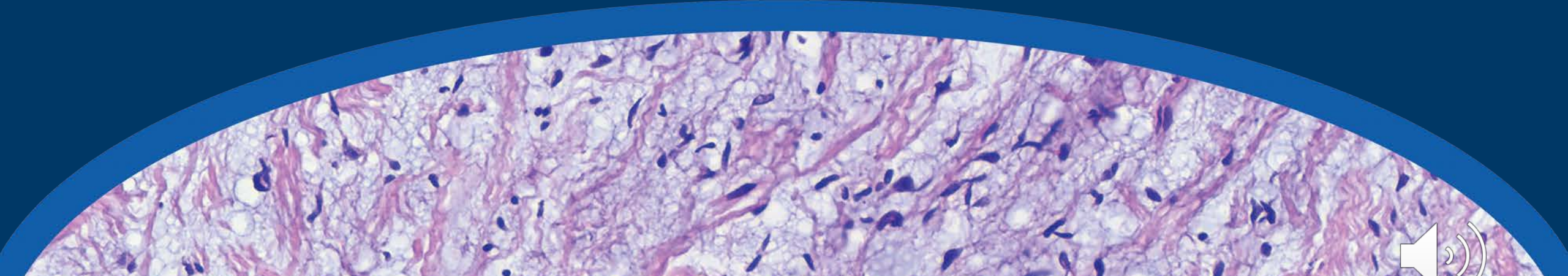
Panel Q&A





Coffee Break

Solaris
Research Trials Clinic

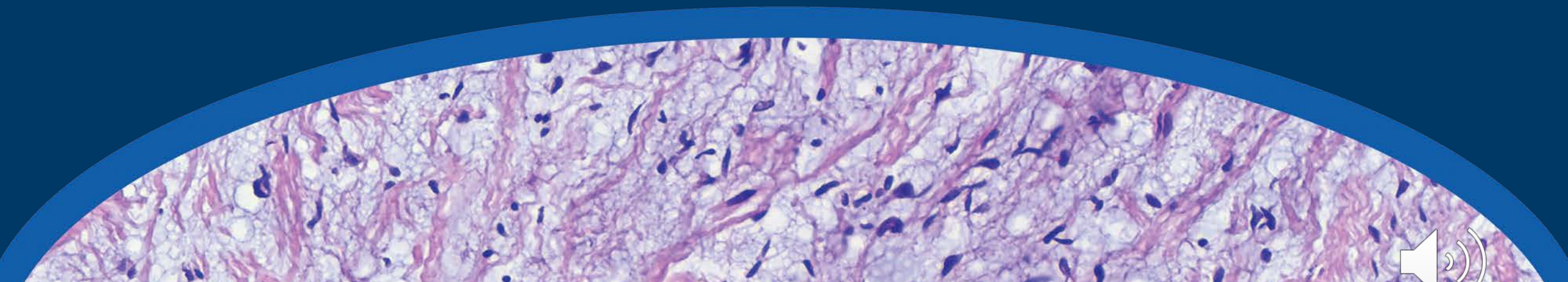




Q&A Session with Troy Tazbaz, Director, CDRH Digital Health Center of Excellence (DHCoE)

Moderated by
Jithesh Veetil, PhD

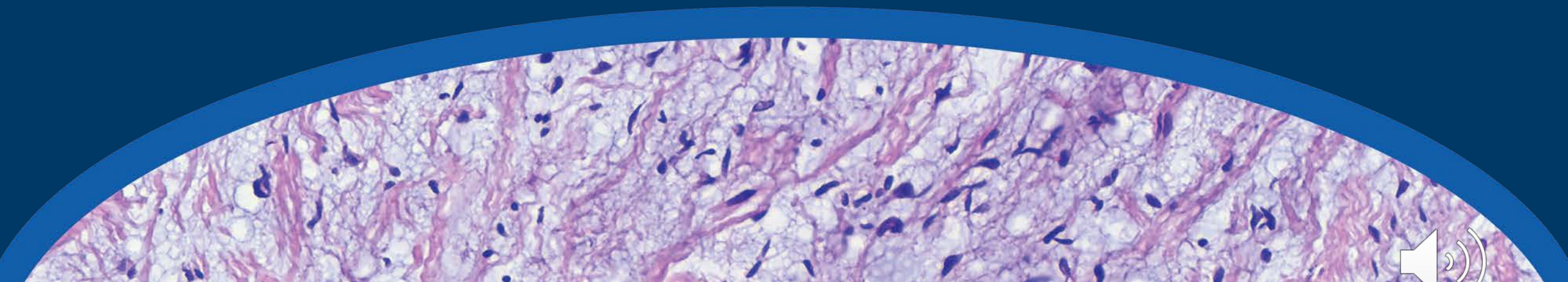
Senior Program Director, Digital Health & Technology (MDIC)





Session 2: From Regulatory Science to Patients

Moderated by
Mark Stewart & Brittany McKelvey

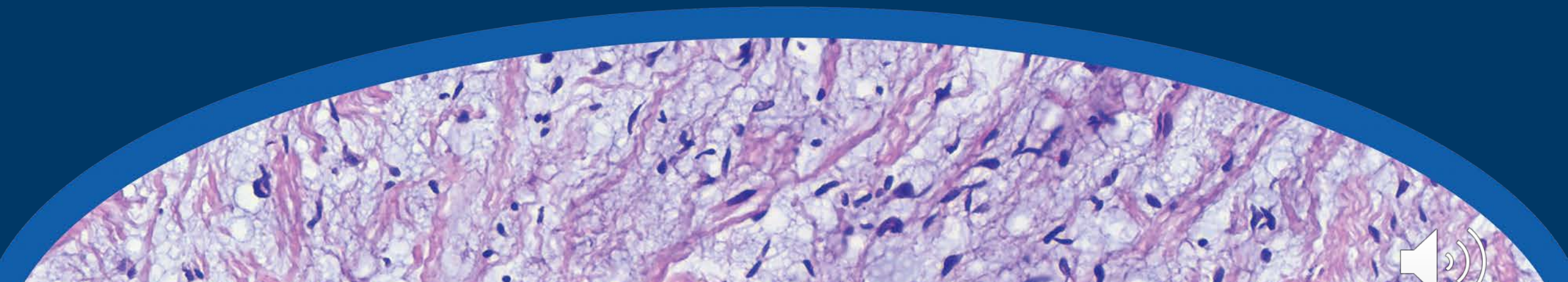




Friends of Cancer research (FOCR): Advancing Regulatory Science

Mark Stewart

Vice President, Science Policy (FOCR)

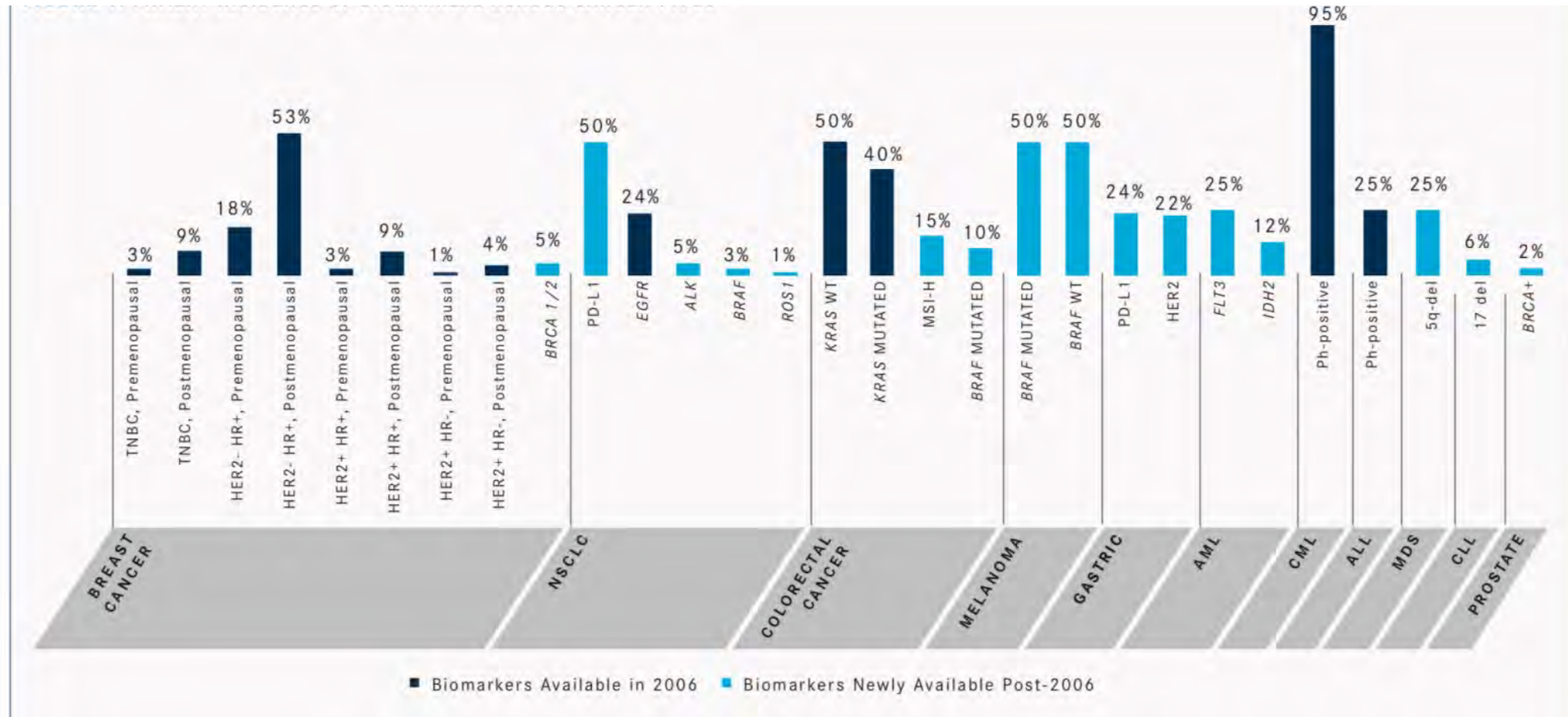


Advancing Regulatory Science Through Collaboration

Mark Stewart, PhD
Vice President, Science Policy
mstewart@focr.org

friendsofcancerresearch.org

Increasing use of biomarkers in cancer research and care

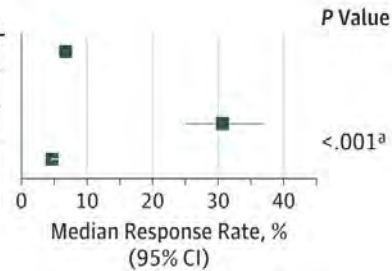


IQVIA. Global Oncology Trends 2019: Therapeutics, Clinical Development and Health System Implications.

Personalized medicine improves outcomes for patients with cancer

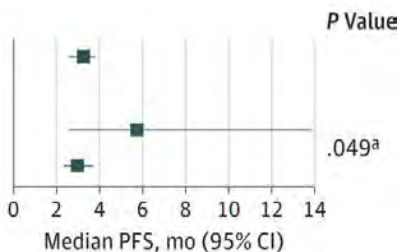
Response Rate

Variable	No. of Arms	Median Response Rate, % (95% CI)
Overall	351	6.56 (5.57-7.72)
Used a personalized strategy		
Yes	58	30.62 (25.0-36.90)
No	293	4.89 (4.22-5.66)



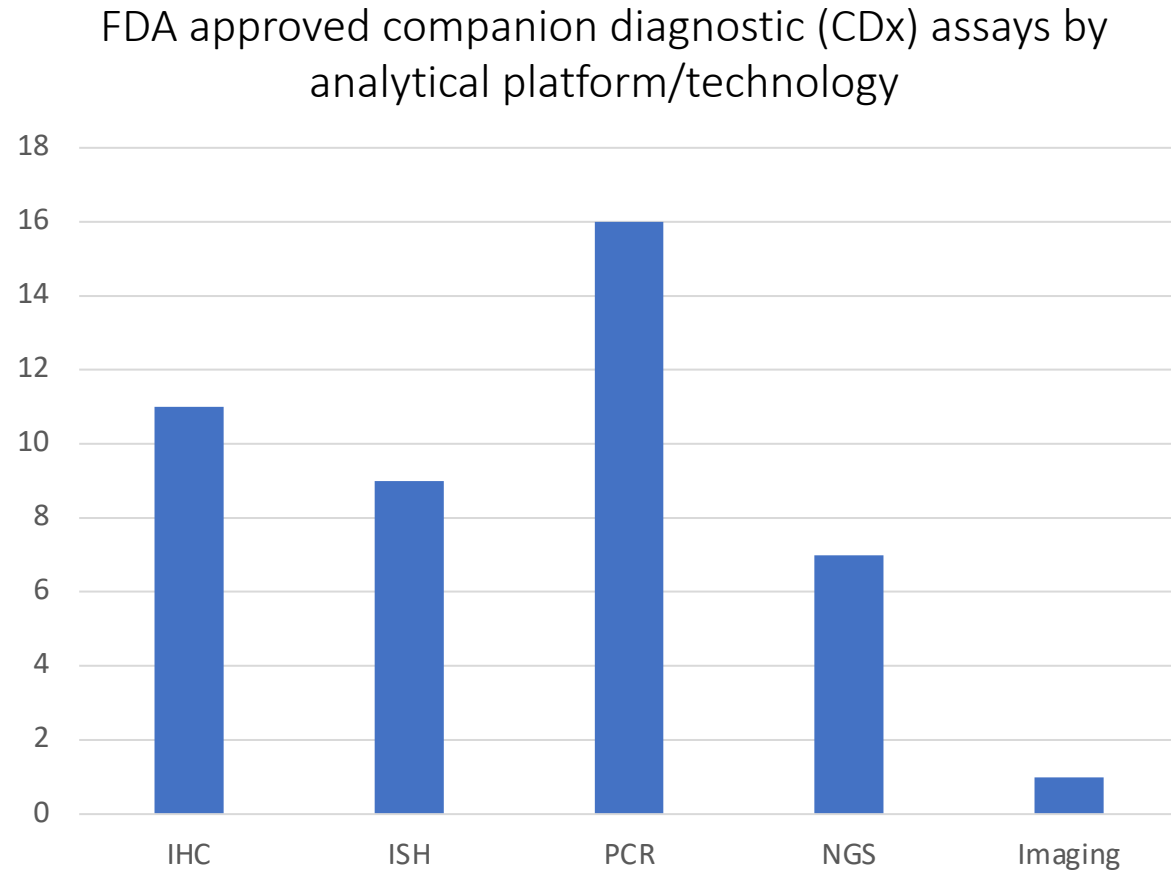
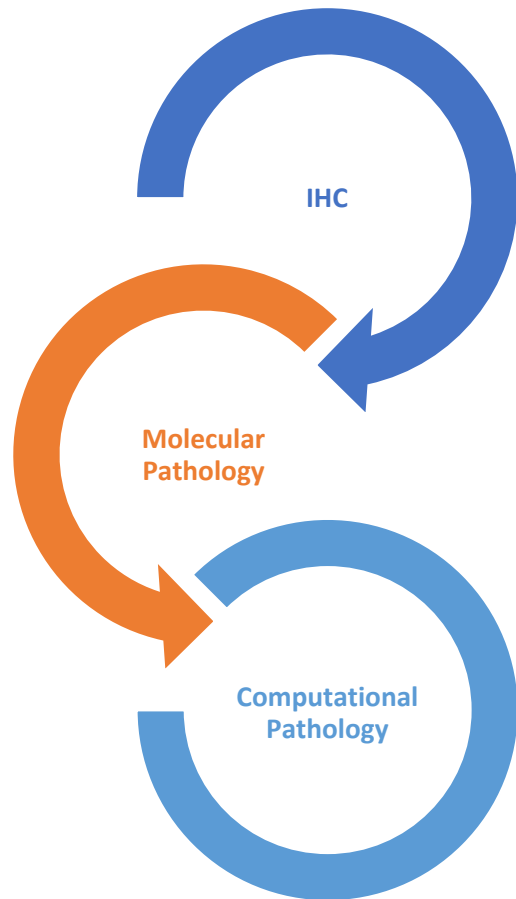
Progression-Free Survival

Variable	No. of Arms	Median PFS, mo (95% CI)
Overall	45	3.23 (2.56-3.80)
Used a personalized strategy		
Yes	7	5.70 (2.56-13.78)
No	38	2.95 (2.30-3.70)



- Biomarkers that stratify patients likely to respond to therapy are now included in 39% of oncology trials, up from 25% in 2010
- Predictive biomarkers were associated with 60% of novel oncology therapeutics in 2018, and three were approved with a companion diagnostic.

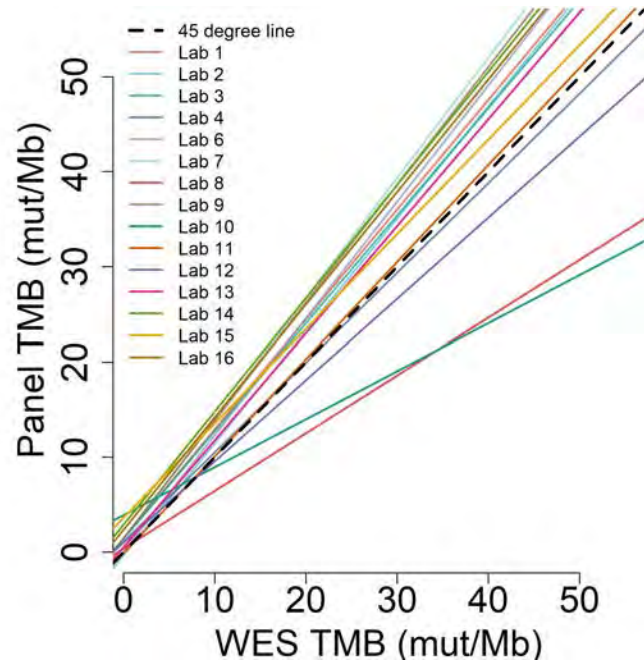
Transformative technology enabling better patient selection and outcomes



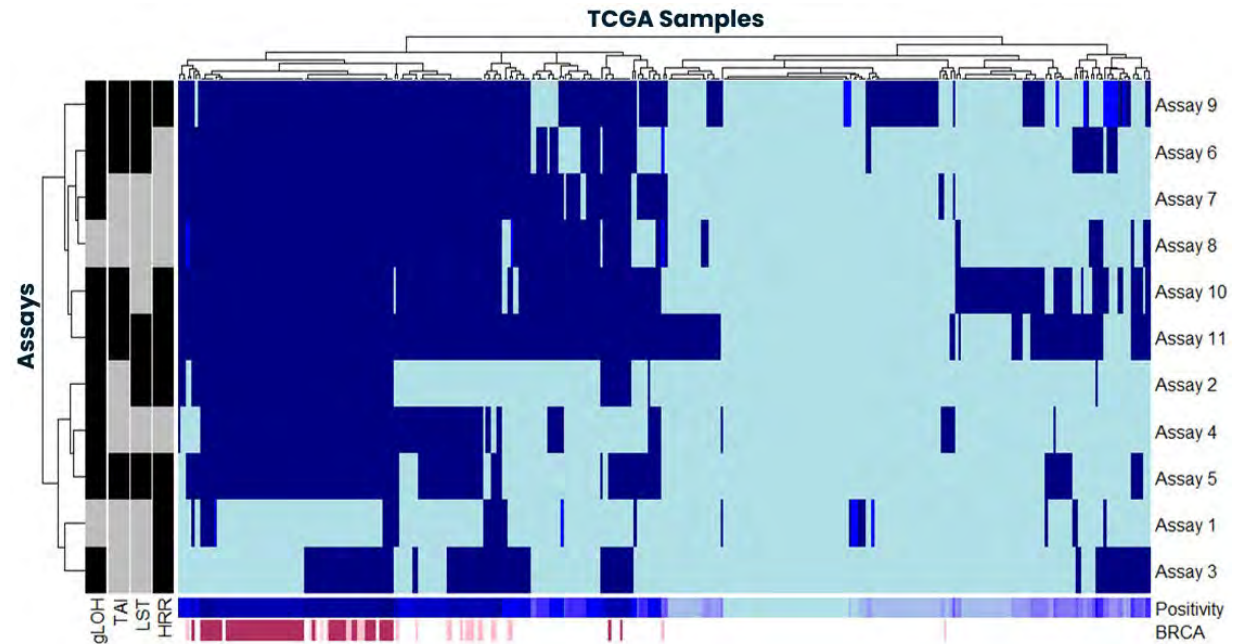
Jørgensen JT. Transl Oncol. 2021 Jun;14(6):101063.

Variation in diagnostic tests: harmonization project case study

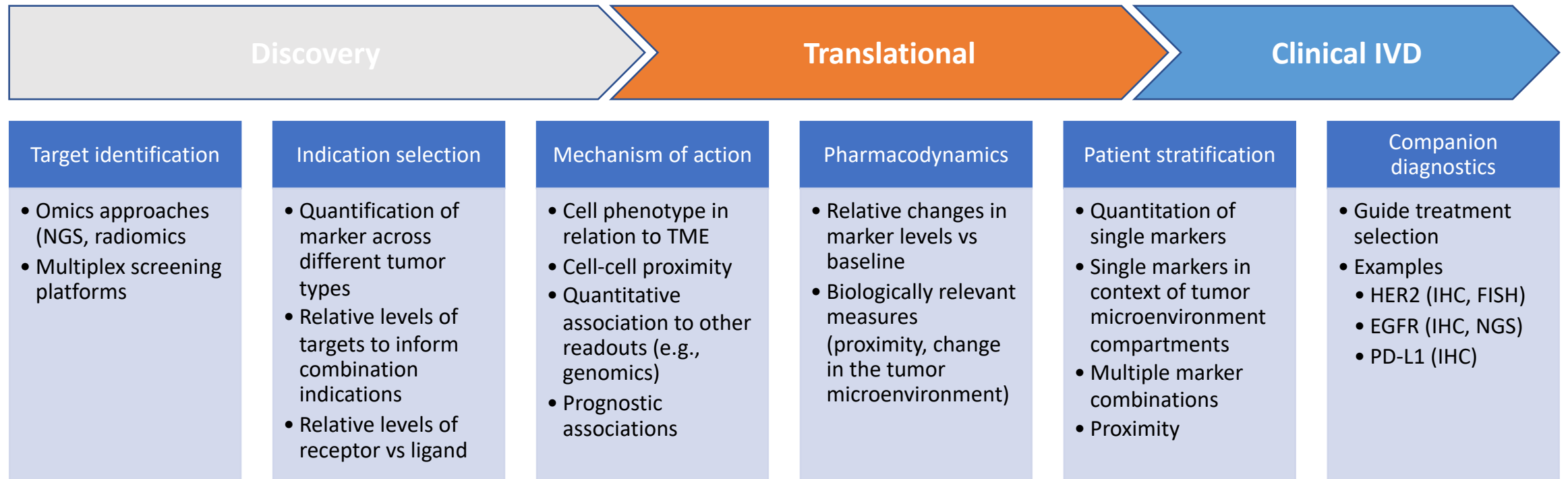
Tumor Mutational Burden



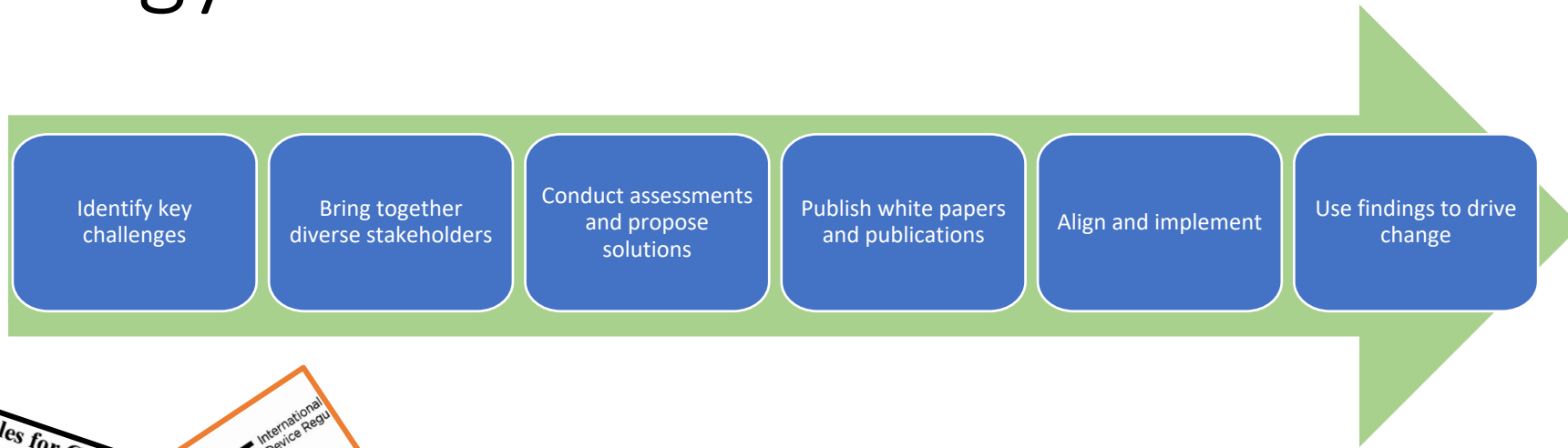
Homologous Recombination Deficiency



Digital pathology: from drug discovery to clinical diagnostics



Applying a collaborative model for digital pathology



Initial Opportunities:

- Outline potential use cases, considerations, and approaches for AI-driven digital pathology in oncology drug development
- Identify key challenges/opportunities for alignment of methodology

Emerging digital pathology harmonization effort

Use Case:

- Antibody-drug conjugates (ADCs) are an emerging drug class and often target cell surface receptors. IHC is used to identify the presence, location, and amount of the target.
 - Example: anti-HER2 ADCs

Objectives:

- Evaluate how comparable biomarker measurements are across digital pathology platforms, with or without comparison to manual readings, with a common set of IHC slides.
 - Identify factors that may contribute to variability observed.
- Determine if a reference set can be used to standardize reporting of digital pathology measurements and performance.

Thank You



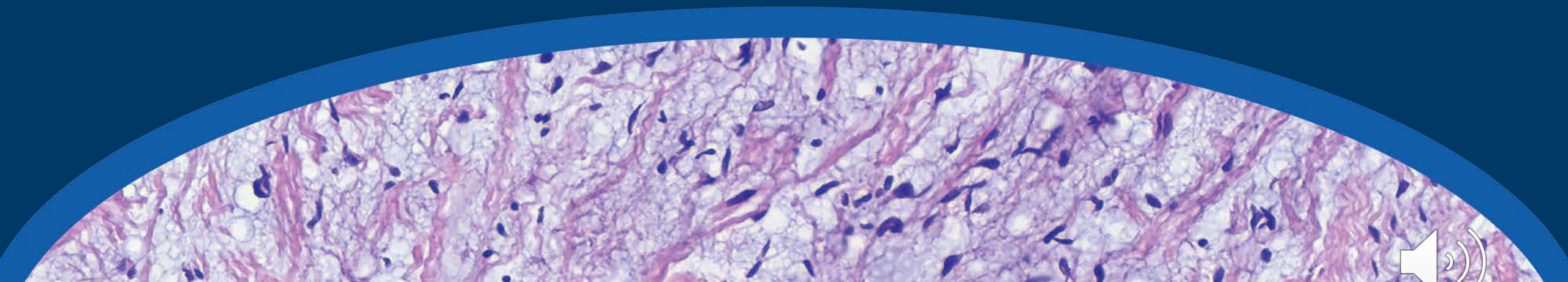
@CancerResrch

friendsofcancerresearch.org



Value of Diagnostics in Healthcare

Hannah Mamuszka
CEO & Founder, Alva10



The logo for ALVA 10 features a stylized infinity symbol on the left, composed of two interlocking loops in orange and light blue. To the right of the symbol, the text "ALVA 10" is written in a bold, white, sans-serif font.

ALVA 10

MOVING DIAGNOSTICS TO THE FOREFRONT OF PRECISION MEDICINE

PICC 2023
Hannah Mamuszka

Dismantling The Coding and Reimbursement Myths

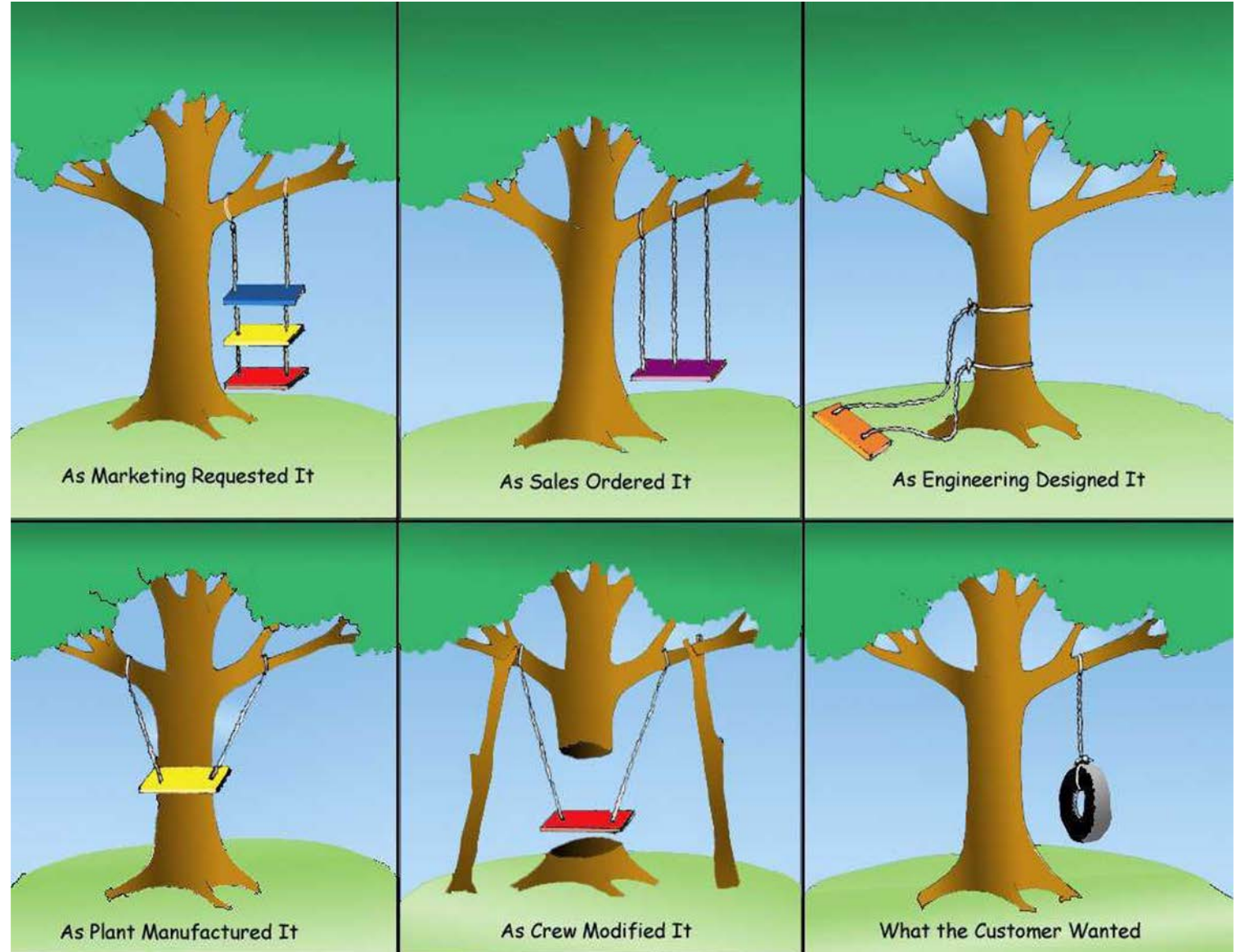
“Coding enables my test to get paid”

“As long as I have a code, I am all set”

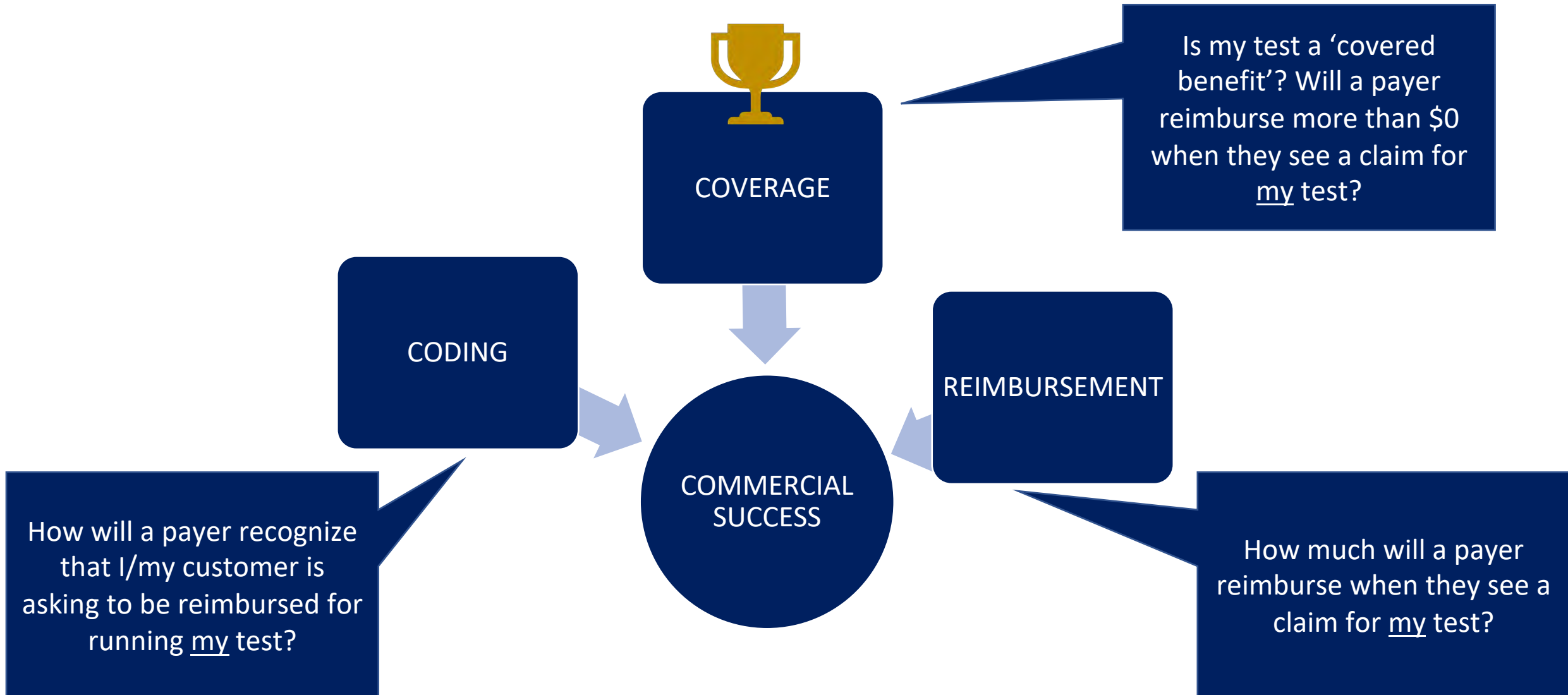
“Reimbursement is just a matter of getting the right code for my test”

Coding guarantees that your test claim will be processed by the insurance company administrative systems. It does NOT guarantee that the claim will be paid.

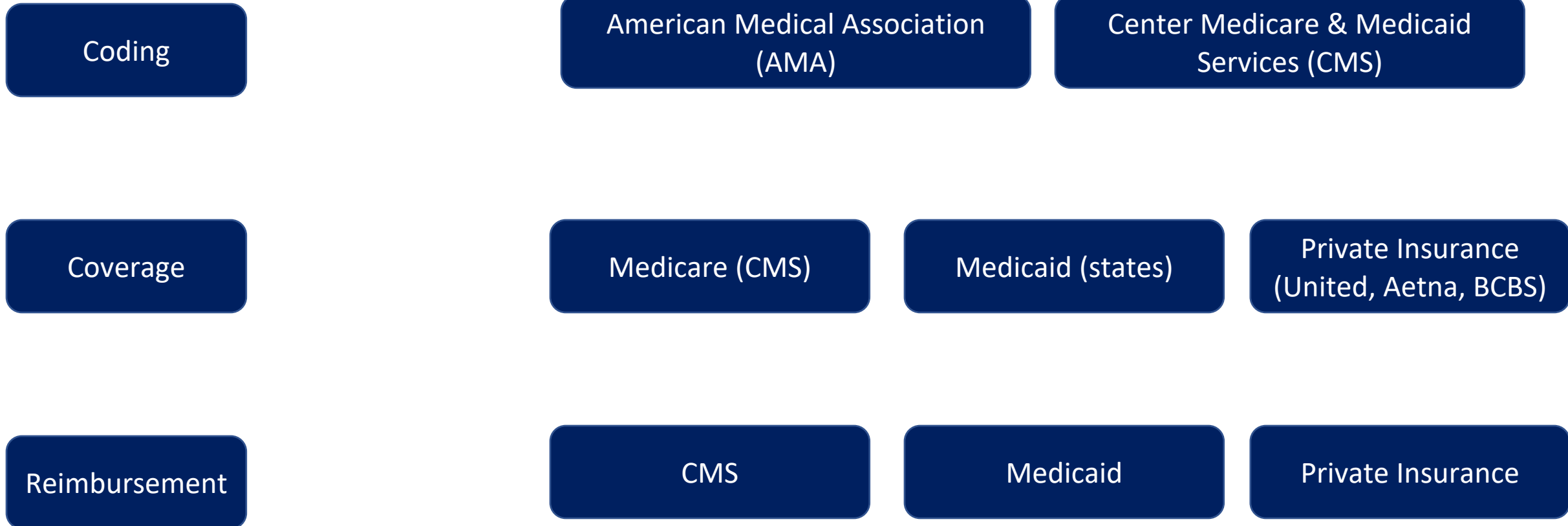
Acknowledging the payer (Medicare, commercial insurance, large employers, etc.) as the end customer of the lab and diagnostics industry



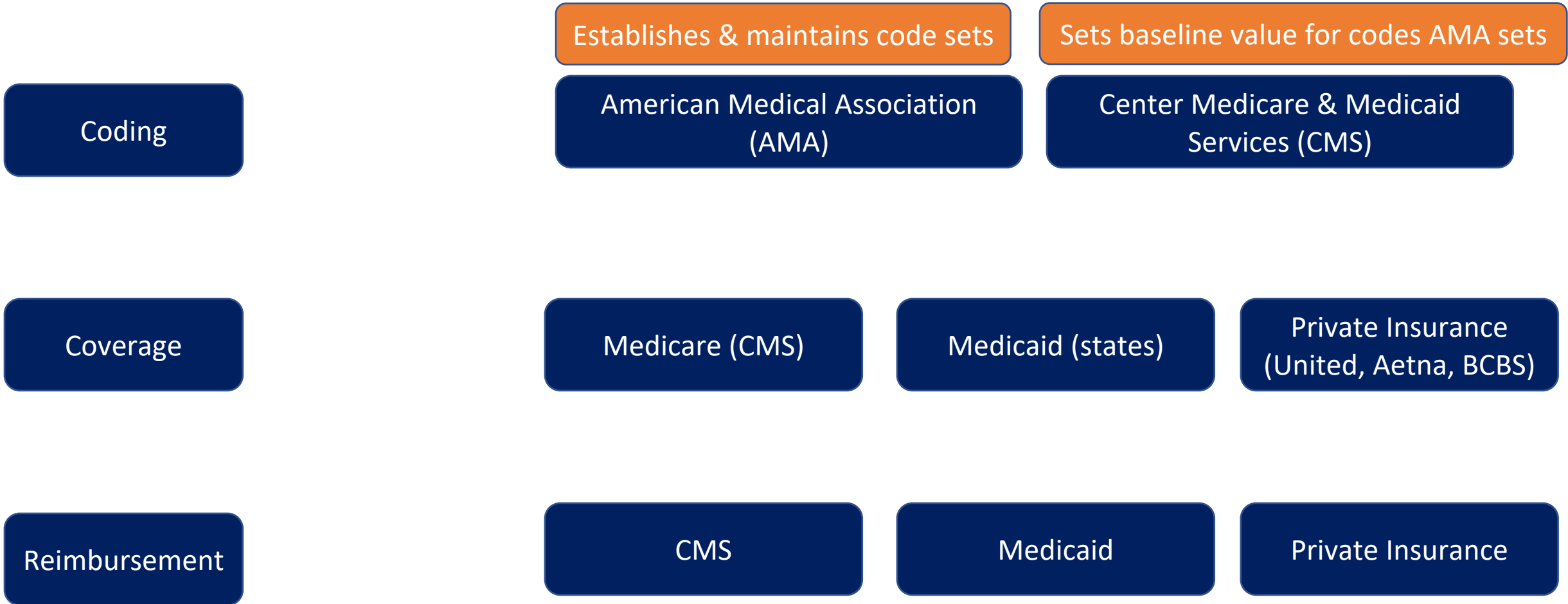
CODING – A PILLAR OF THE U.S. HEALTHCARE SYSTEM



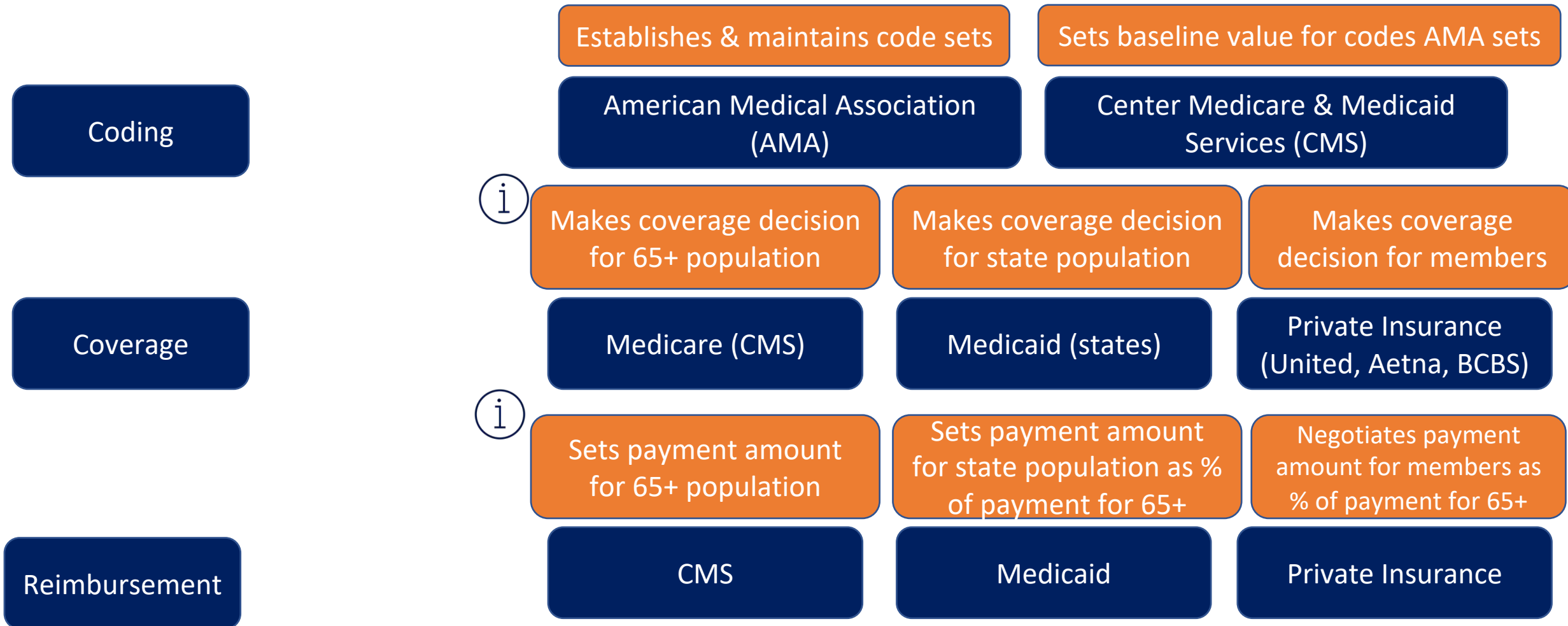
STAKEHOLDERS OF REIMBURSEMENT ECOSYSTEM



INTERPLAYS BETWEEN STAKEHOLDERS



INTERPLAYS BETWEEN STAKEHOLDERS





WHY DIAGNOSTICS STRUGGLE TO GAIN TRACTION

TOO OFTEN, DIAGNOSTIC COMPANIES:

- Don't understand economic impact of test to payers
- Don't confirm clinical utility with physicians
- Struggle with sample collection for development and validation
- Don't publish their data early enough
- Don't generate enough evidence to warrant coverage
- Assume early revenue before evidence is ready; don't raise enough money or allow enough time to generate evidence



**Leading the
payers to see**

- Physicians who don't understand, don't agree with, or won't use the test
- Small data sets for validation
- Inaccurate economic assumptions
- Lacking or limited peer reviewed data
- Insufficient evidence for coverage
- An inability to generate more evidence to obtain coverage



Clinical Utility Confirmation

Do physicians agree there is a clinical problem?
Do physicians agree this test solves the problem?
Will physicians use this test?
Will using the test improve patient outcomes?



Payer Utility Agreement

Do payers agree there is a problem?
Do payers agree with the clinical utility of the test?
Do payers agree with the economic utility of the test?
How much data will payers need to see for pilot study engagement or coverage?



Commercial Planning

Is the company ready to deliver?
Coding timeline and planning
Billing logistics
Sales support and clinical training
Customer development and marketing support
Lab infrastructure (including reporting and TAT in clinical window)



Path to coverage and revenue



DESIGN WITH THE END IN MIND: ECONOMIC AND CLINICAL UTILITY

ECONOMIC UTILITY

- Allowing payers to appreciate downstream economic impact of implementation of test
- Empowering payers to enforce/waive Prior Auth when cost effective clinical pathways are clarified by diagnostic information
- Enabling payers to message improved patient outcomes and reduced employer costs to their customers for membership retention purposes

CLINICAL UTILITY

- Accurate diagnosis of disease
- Risk stratification
- Response prediction
- Patient adverse event profiles
- Payer costs of obtaining sample/diagnosis
- Critical junctions where lack of information leads to expensive interventions

The logo consists of two interlocking loops, one orange and one light blue, forming a stylized infinity symbol or a continuous path.

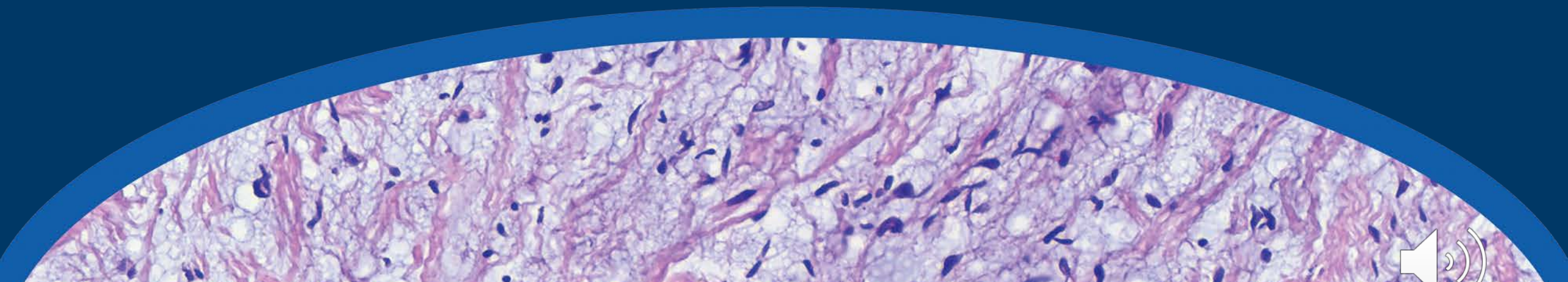
ALVA 10

MOVING DIAGNOSTICS TO THE FOREFRONT OF PRECISION MEDICINE



The Journey to Precision Pathology

Mariano de Socarraz
CEO, CorePlus

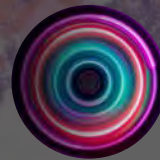


A microscopic image of tissue, likely stained with hematoxylin and eosin (H&E), showing cellular structures and some red-stained areas. The image is semi-transparent and serves as a background for the text.

THE JOURNEY TO

PRECISION PATHOLOGY

BY MARIANO DE SOCARRAZ



MDIC
MEDICAL DEVICE
INNOVATION CONSORTIUM



**CORE
PLUS**

Welcome to our world™

About us

welcome to our world

Total Cases

>125,083 >10,389
WSI AI

Total Slides

>345,795 >124,882
WSI AI

Tech-enabled



Since 1996

Established in
Carolina
Puerto Rico

Faculty

M.D.s, Ph.Ds, and
professionals with
vast field experience

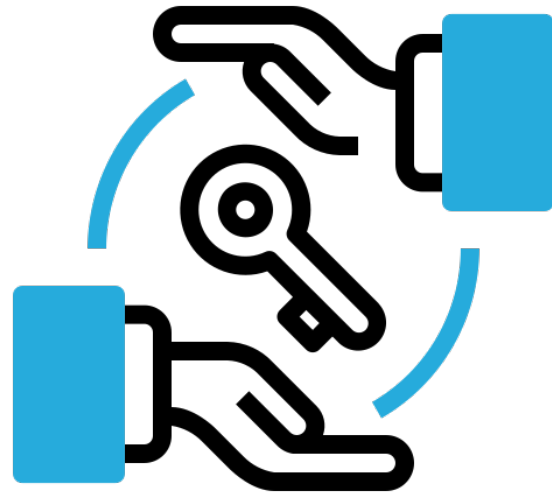
4 Years

In the
Digital Pathology
venture

Our Journey

To Digital Pathology & AI

Research

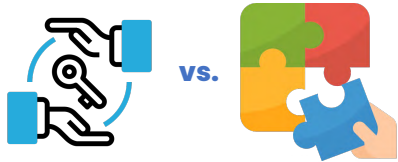


vs.

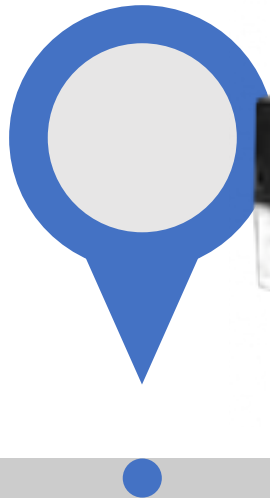


Our Journey

To Digital Pathology & AI

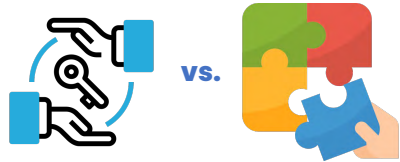


Research



Our Journey

To Digital Pathology & AI

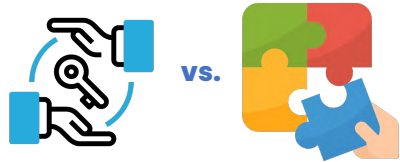


Research



Our Journey

To Digital Pathology & AI



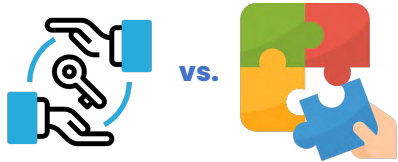
Research





Our Journey

To Digital Pathology & AI

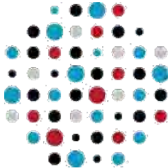


Research

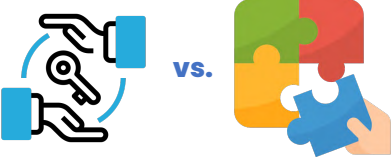


Our Journey

To Digital Pathology & AI



COLLEGE of AMERICAN
PATHOLOGISTS
Validation guidelines

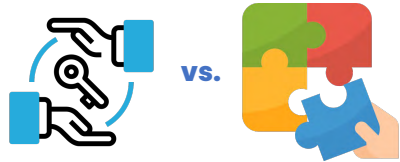


Research



Our Journey

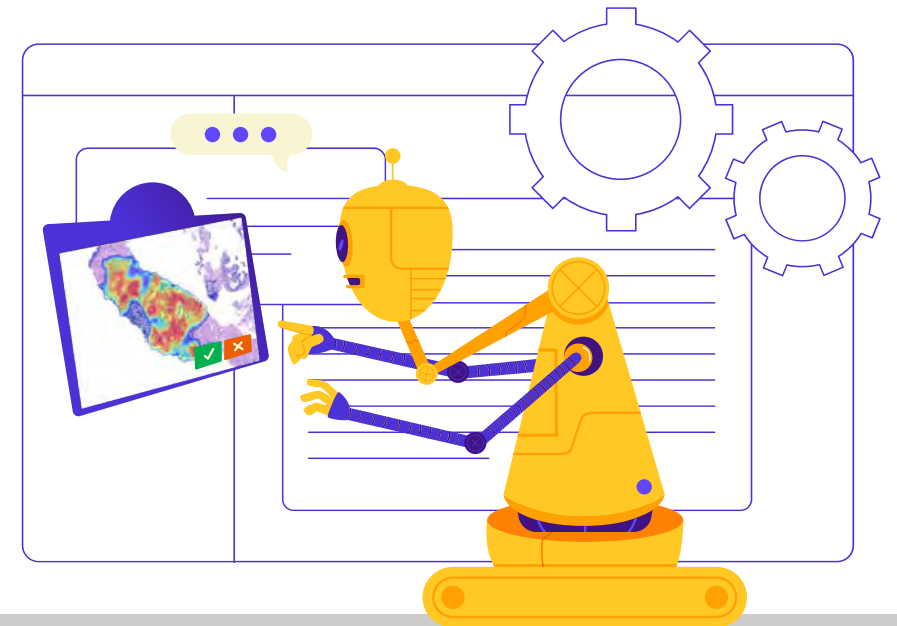
To Digital Pathology & AI



Research



COLLEGE of AMERICAN
PATHOLOGISTS
Validation guidelines



Our Journey

To Digital Pathology & AI

Research

Upgrades



Our Journey

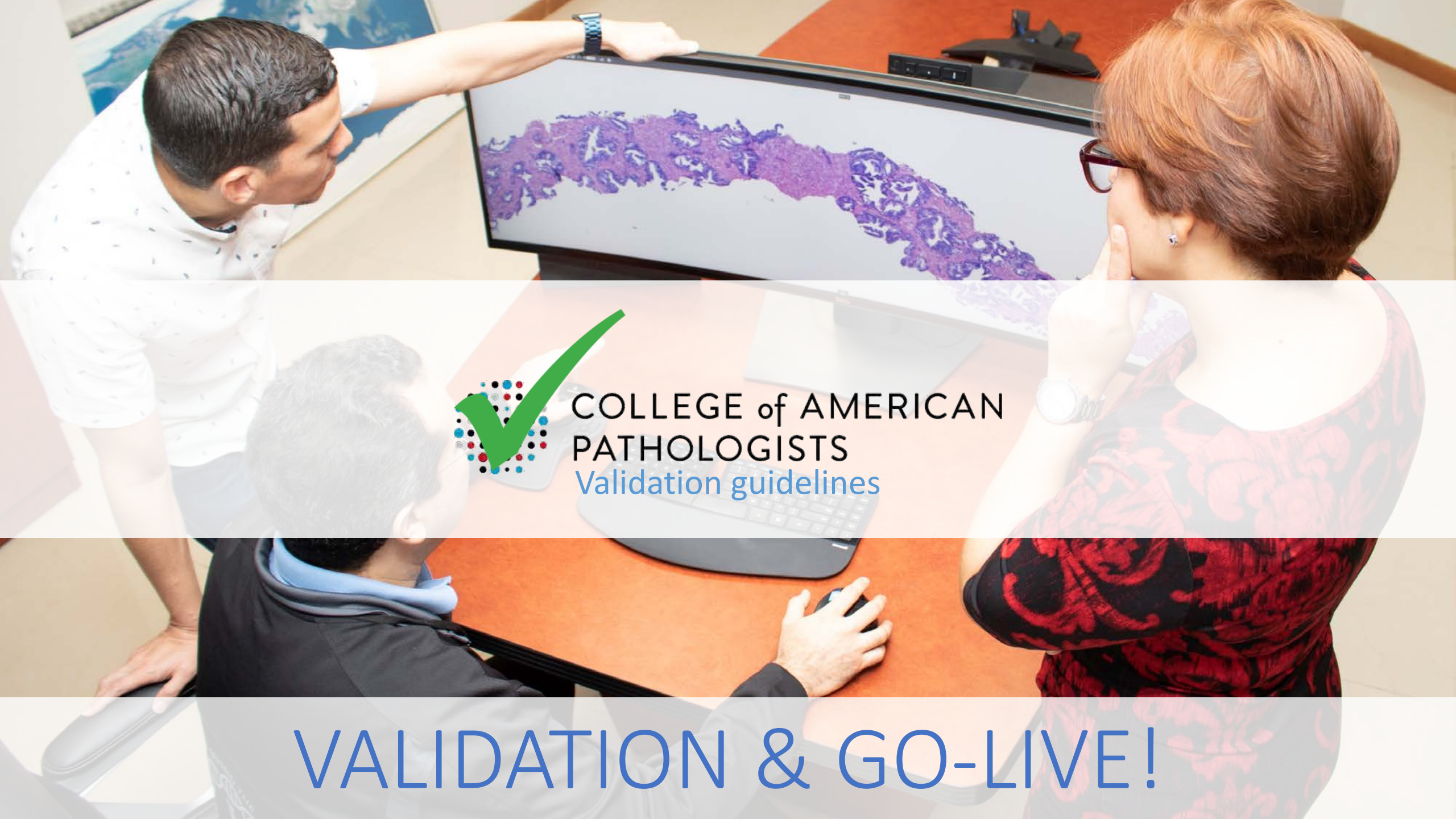
To Digital Pathology & AI



Research

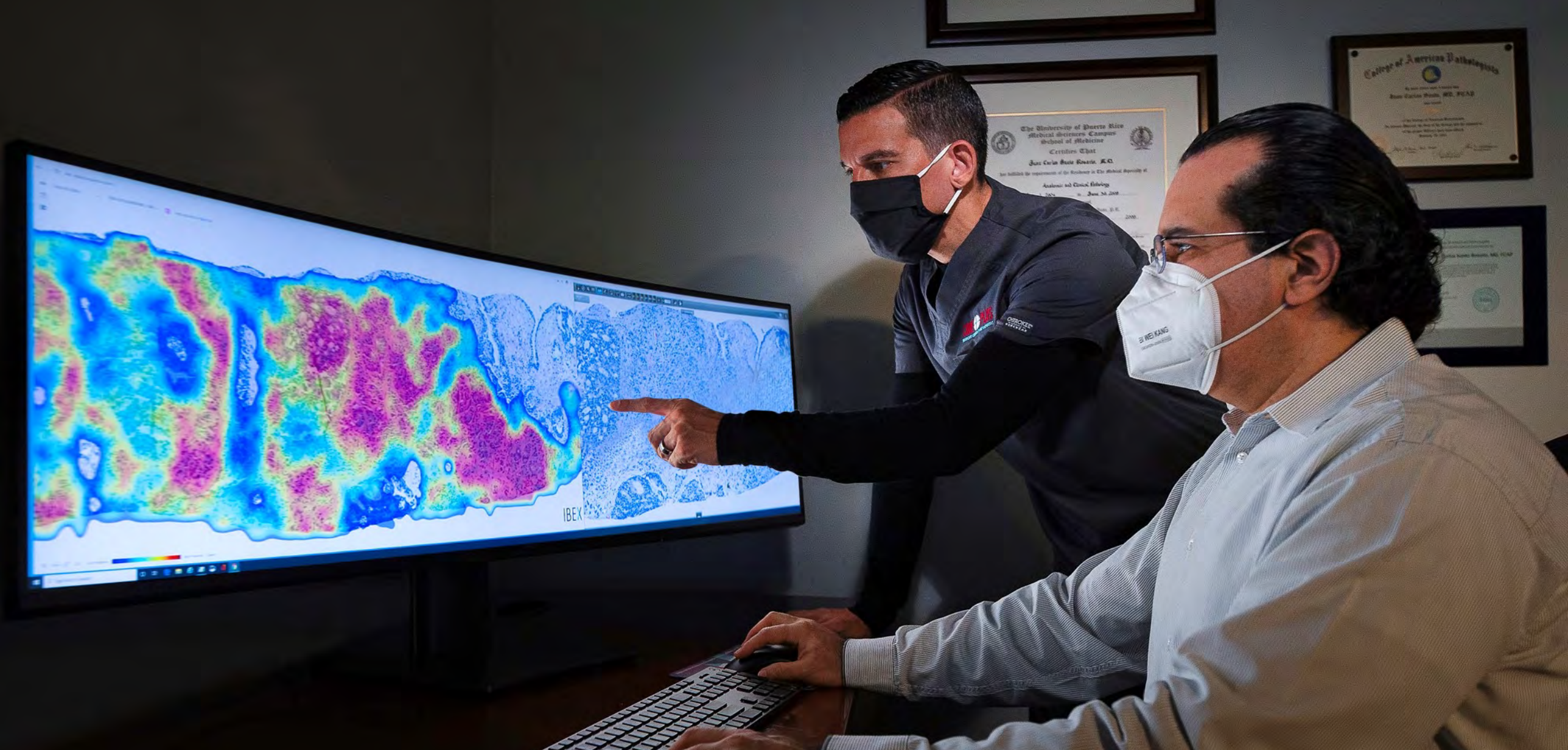
Upgrades





COLLEGE of AMERICAN
PATHOLOGISTS
Validation guidelines

VALIDATION & GO-LIVE!



AI-ASSISTED DIAGNOSIS

Our Journey

To Digital Pathology & AI

Research



2018-2019

Upgrades



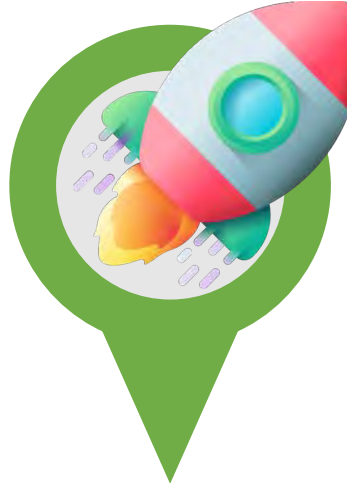
2019

WSI
Validation



2019

WSI
Go-Live!



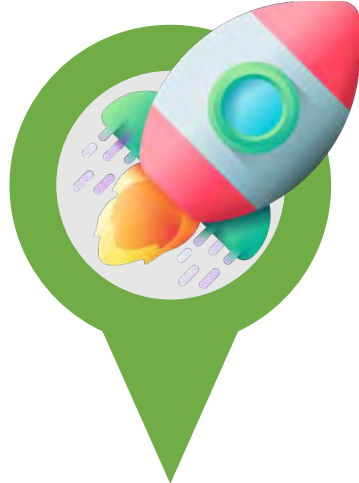
1/1/2020

AI
Validation



2019-2020

AI
Go-Live!

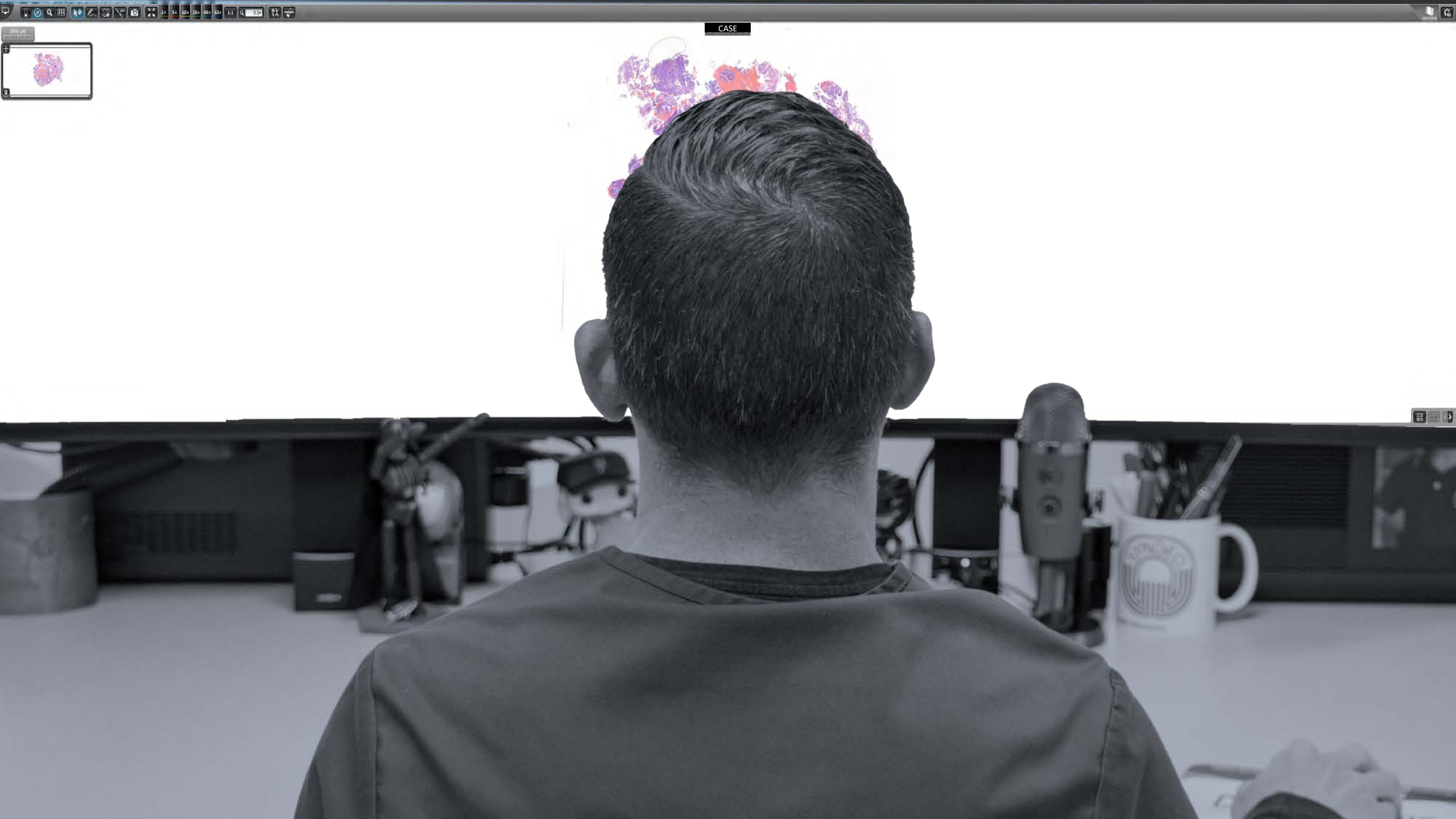


6/1/2020

So, how does **Pathology** look like in



CASE



Takeaways

Opportunities beyond the digital slide



Operational ROI

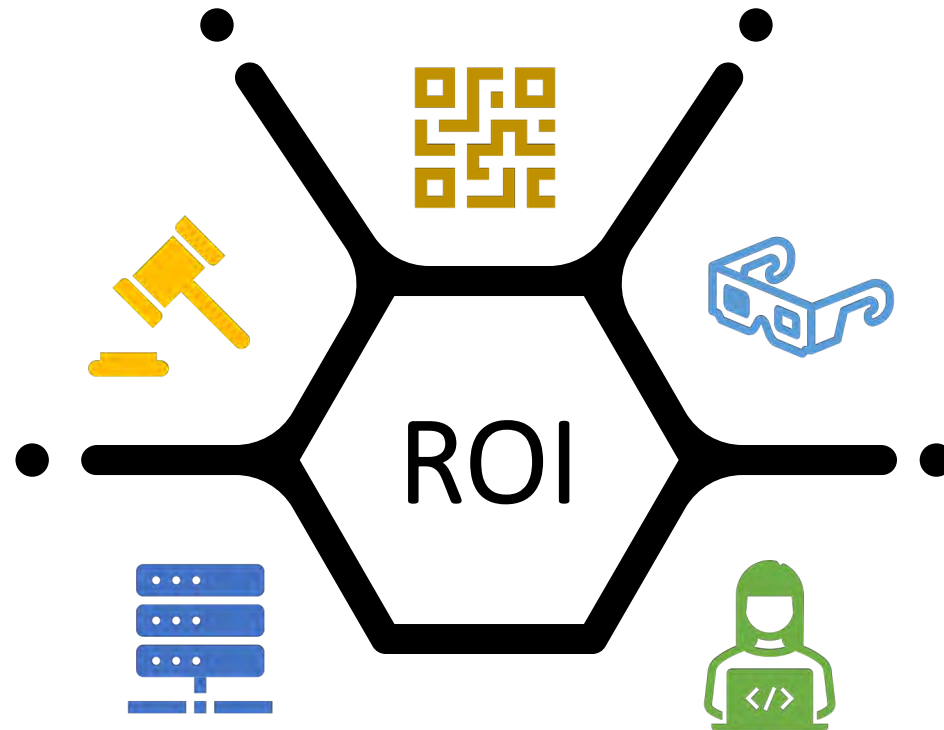
**Decrease
Liability**

**Infrastructure &
Interoperability**

**Safety
(TPID)**

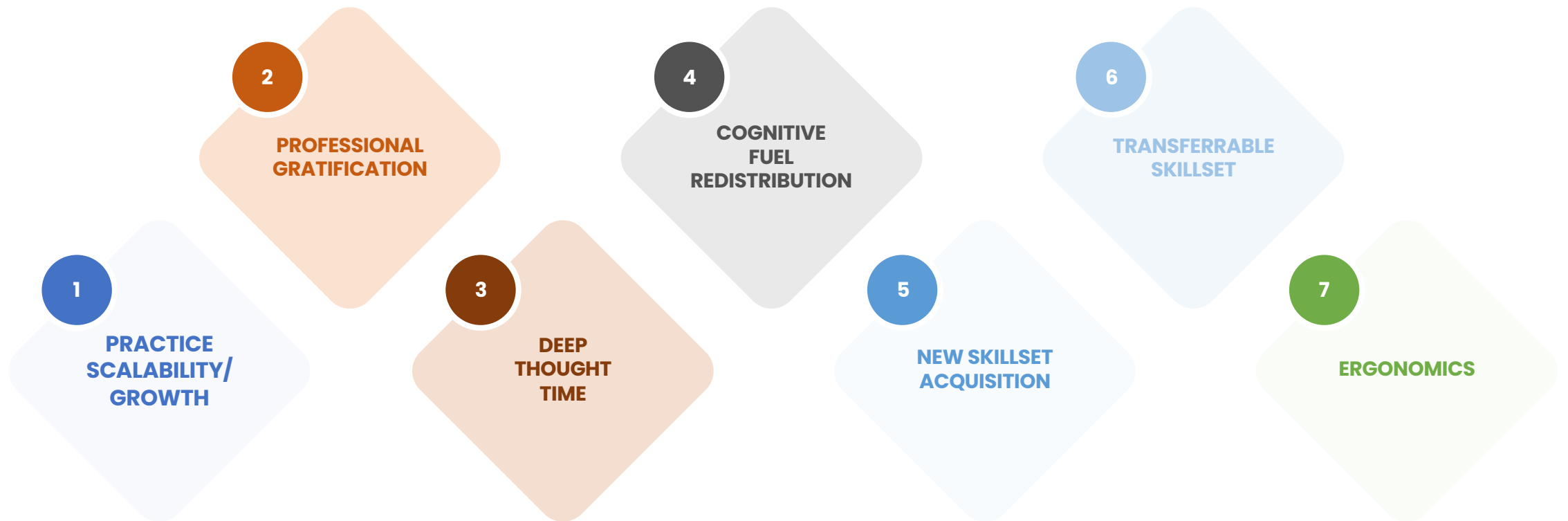
**Digital
Workflow**

**21st Century
Toolkit**

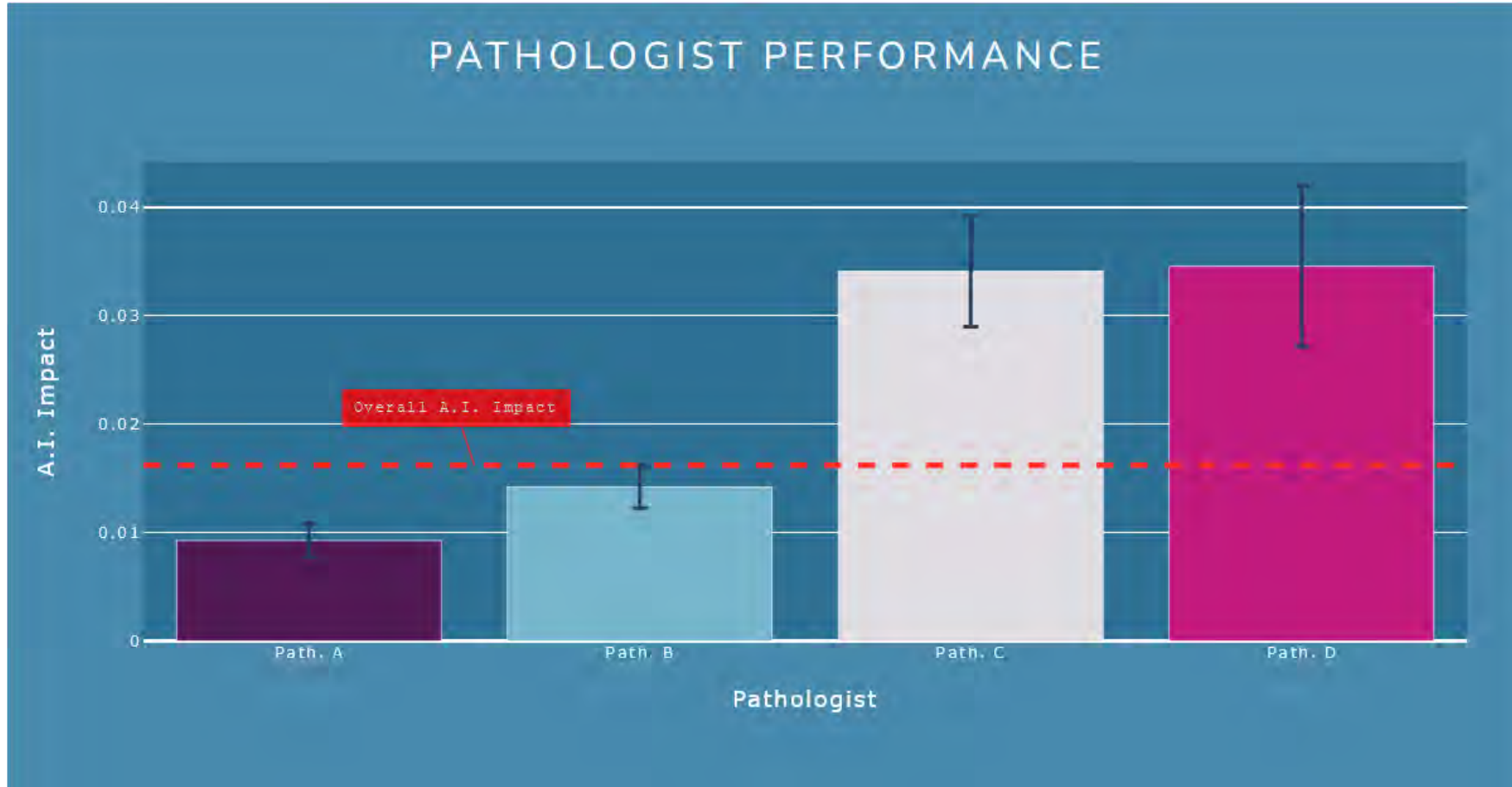


HUMAN RESOURCES ROI

Make a big impact with our professional slides and charts



Prostate AI Impact



9310

Total Cases

365,061

Tissue Sections

74

Men would not know they have cancer

THE VALUE IN ARTIFICIAL INTELLIGENCE

QALY = Quality Adjusted Life Years

1

~17,500 Fewer Undiagnosed Cases

Increased cancer detection



2

0.15 QALY Gained per Biopsy

Higher quality of life



3

\$7,500 More Value per Test

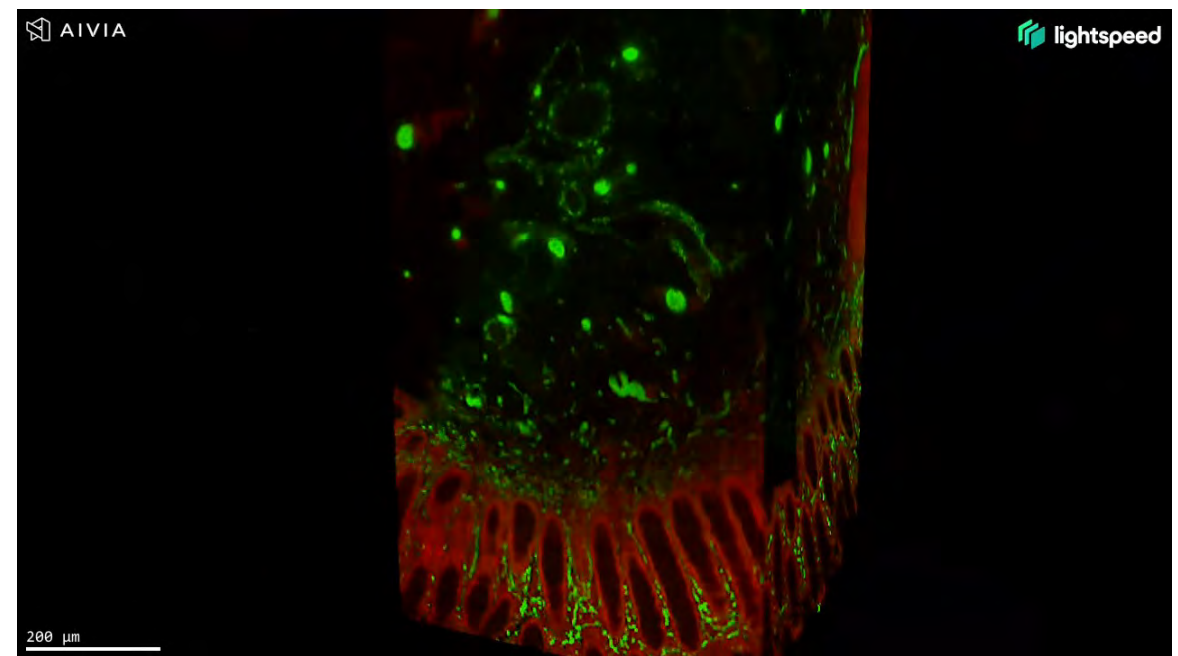
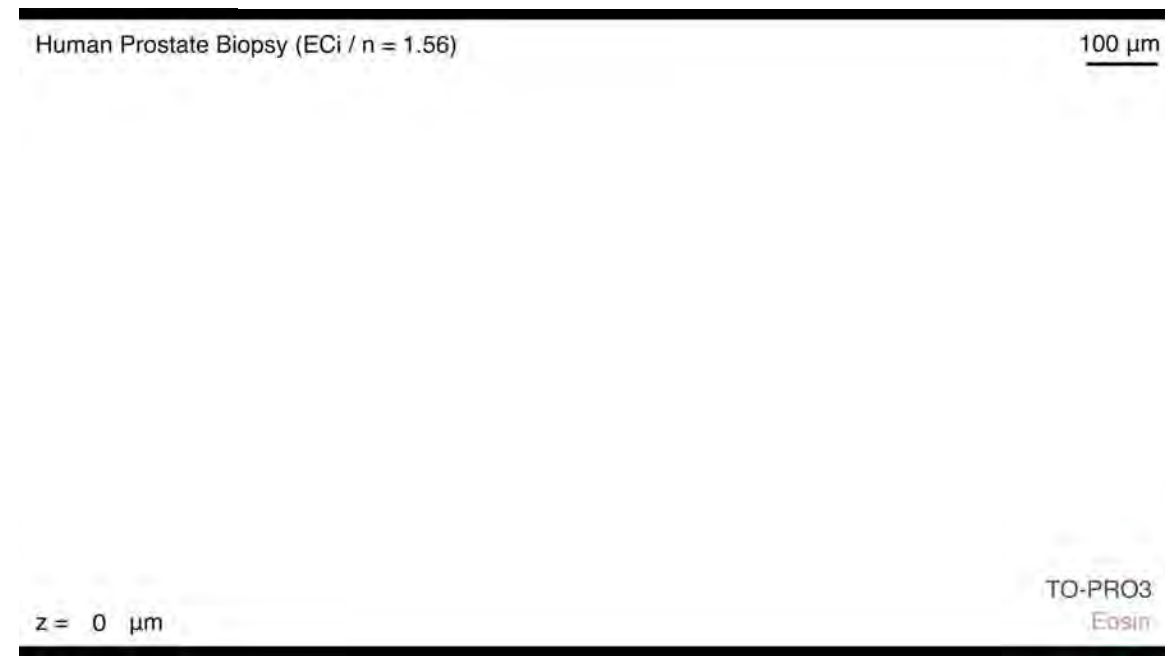
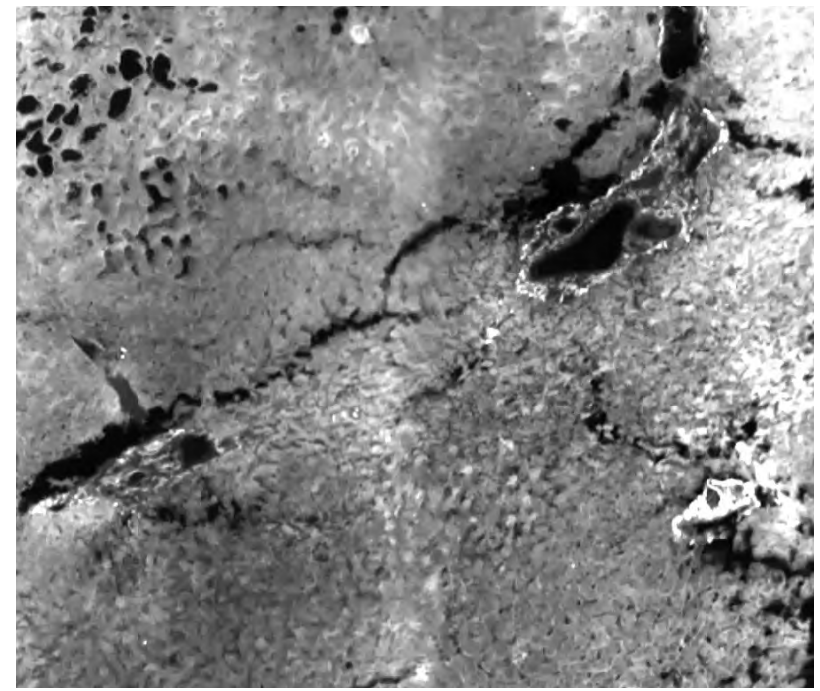
7.5% Increase in Value



... one more thing...



ALPENGLOW
BIOSCIENCES



“Once an AI technology has been validated and demonstrated to improve outcomes (and assuming the existence of high-quality evidence to support this), it raises the question of whether it would be unethical not to apply it in clinical practice.”

*Jackson B., et al, The Ethics of Artificial Intelligence in Pathology and Laboratory Medicine: Principles and Practice
Academic Pathology: Volume 8 2021, DOI: 10.1177/2374289521990784*



CORE PLUS



THANK YOU!

GET IN TOUCH



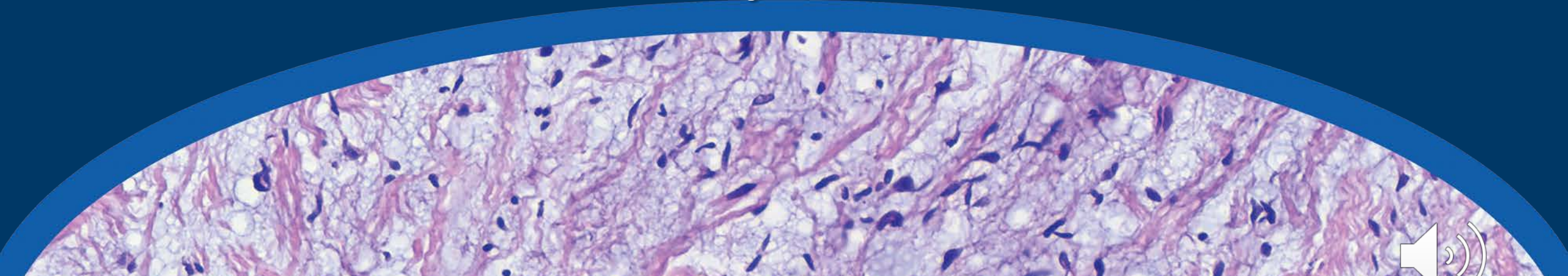


What We Can Learn From Other Technologies

P. "Mickey" Williams, Ph.D.

Director, Molecular Characterization Laboratory

Frederick National Laboratory for Cancer Research, NIH





Development, Validation and Harmonization of NGS Assays

Experiences from NCI-MATCH

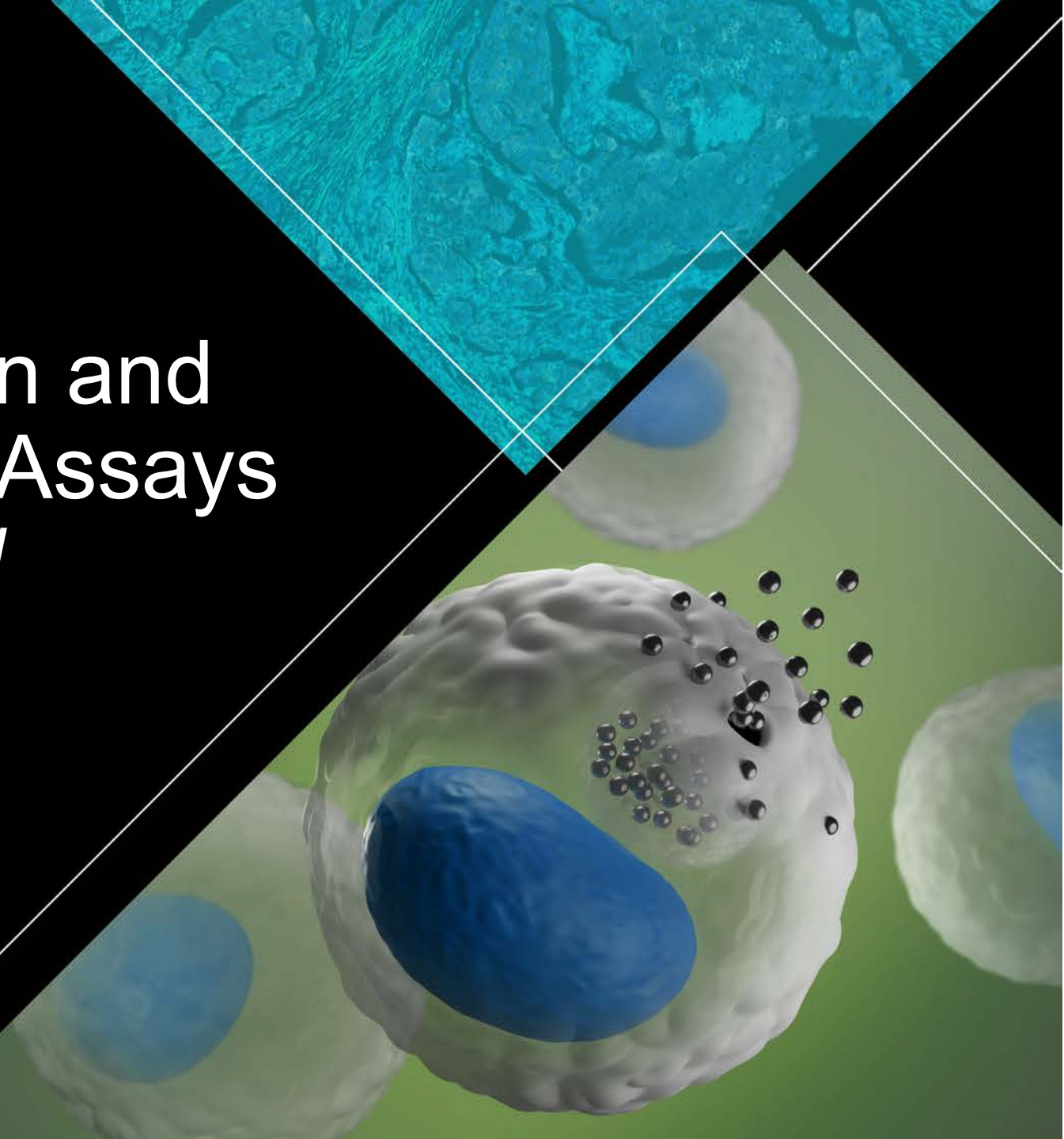
P. Mickey Williams, PhD

Director of the Molecular Characterization Lab,
Frederick National Laboratory for Cancer Research

Jyune 27-28, 2023



SPONSORED BY THE NATIONAL CANCER INSTITUTE





Talk Overview

- High level overview of assay development & validation for the NCI-MATCH Trial
 - The NCI-MATCH Trial concept was developed in 2014-15
 - The trial launched prior to clinical NGS becoming a “routine” part of patient management AND prior to FDA clearance or approval of any NGS test
 - Concern about impact of uncontrolled pre-analytics; resulted in provision SOPs for core needle biopsy collection, shipping kits containing specimen vessels (formalin filled jars), overnight shipment to a pre-analytic processing lab (central specimen processing, blocking, macro-dissection and extraction)
 - Concern about cross assay & cross laboratory consistency of NGS, resulted in development of a central lab network, single assay platform and central data analysis pipeline
 - In my mind these concerns parallel similar concerns in the current state of AI driven digital pathology
- Finish with a snapshot of some community wide efforts, intending to ensure accuracy and consistency of critical clinical assays

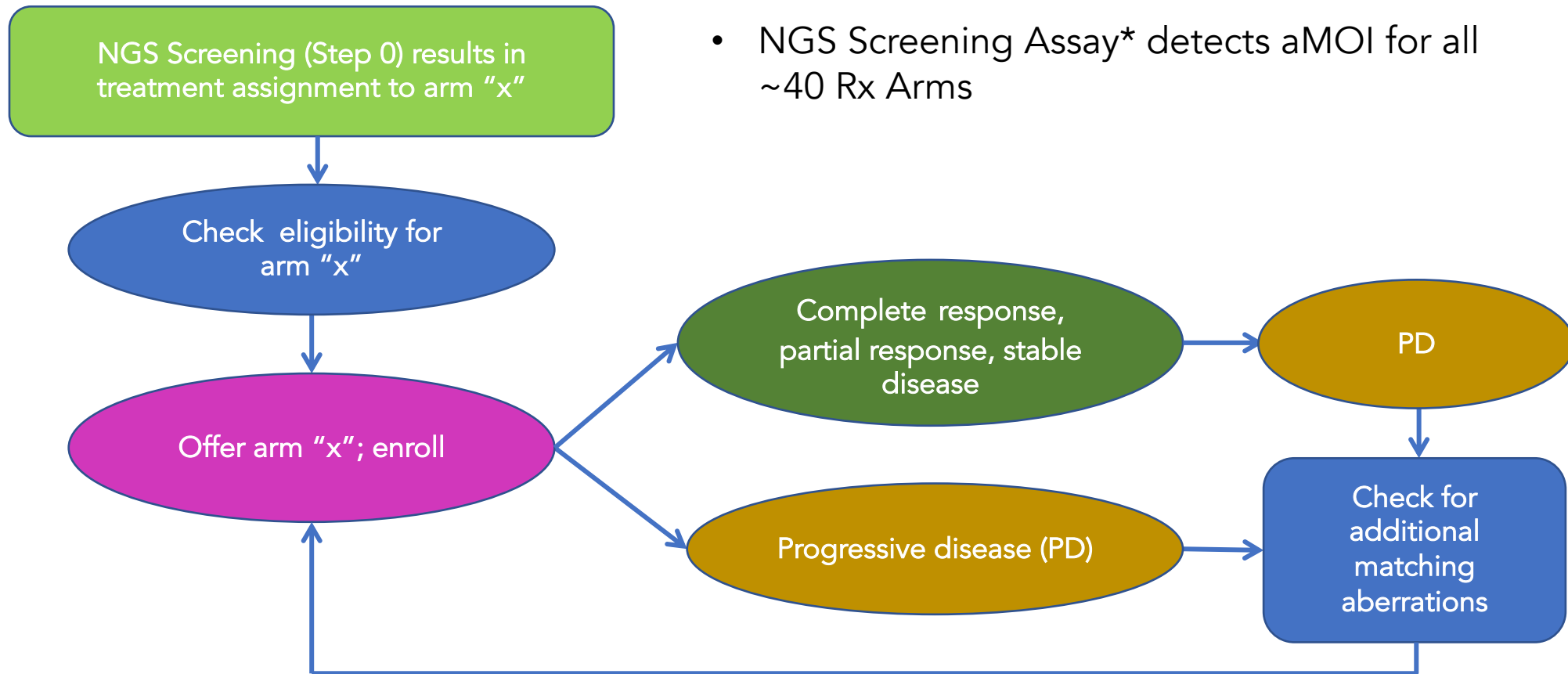


Precision Medicine in Cancer Treatment

- Precision medicine is the tailoring of treatment for each individual based on molecular abnormalities found in tumors rather than the type of cancer
- Example:
 - *BRAFV600E* melanoma responds to BRAF inhibitors or BRAF inhibitors combined with MEK inhibitors but colorectal cancers with the same mutations appear not to respond
- We need to know more about which tumors will respond to agents targeted to “driver” mutations
- Most driver mutations are relatively rare across all tumor histologies
- A multi-arm treatment, precision medicine master screening protocol was developed

NCI-MATCH Schema (Single-Arm Phase II)

NCI-MATCH was the largest Precision Medicine Trial encompassing over 1,400 enrollment sites and 40 different treatment arms contained in 1 Master Protocol





NGS Assay Requirements

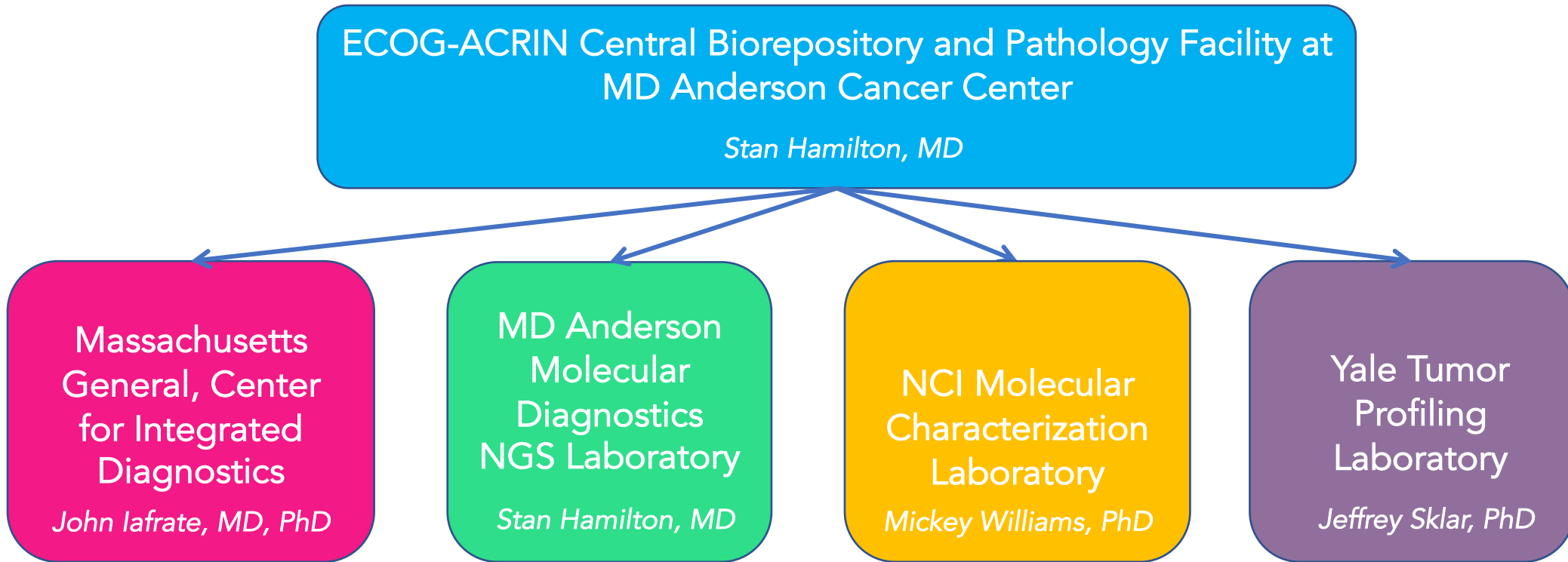
- Required multi-analyte assay for screening for many treatment actionable somatic mutations
- Minimal tissue and nucleic acid input
 - Core needle biopsies, shipped overnight in formalin
- Acceptable performance with FFPET from all solid tumor histologies
- Cost efficiency for small specimen batch size
- Goal of 15-day turn-around-time
- Assay performance requires high specificity, acceptable sensitivity and reproducibility across labs, staff and instruments
- Based on the early state of clinical NGS, decision was made to use a central lab network, using the same analytically validated and harmonized NGS platform
- Input from many led to an assay platform selection; Oncomine Cancer Panel v1
- Details along with required analytical performance metrics were documented in “The Assay Intended Use Statement” and “Validation Plan”



Define the Assay System

- The assay system detailed via SOPs:
 - Sample acquisition
 - Shipment kits/instructions
 - Pre-analytic processing
 - Nucleic acid extraction
 - Shipment to assay laboratories
 - Receipt and accessioning
 - Assay protocols:
 - Reagents
 - Instruments
 - Assay controls
 - Assay QC acceptance criteria
 - Harmonized central data analysis and clinical report template

A Central Laboratory Network was Established



Tumor testing using validated single platform across central lab network of CLIA certified clinical laboratories



Pre-validation Activities and Analytical Validation(s)

- Laboratory groups met weekly to generate harmonized SOPs, assess pre-validation feasibility data and make tweaks, lock SOPs and data analysis pipeline
- Pre-submission meetings with CDRH to discuss “Intended Use” and “Validation Plan”
 - Intent to enroll patients across all solid tumors and lymphoma, patients will have progressed after treatment with standard of care
 - The use of NGS for patient enrollment screening and treatment assignment led to a nonsignificant risk assessment, requiring an Abbreviated IDE operation
 - The meetings proved very helpful input prior to moving into Analytical Validation
 - Need to demonstrate accurate performance in potentially difficult tissues (brain, pancreas, bone, blood, etc.)
 - Demonstration of harmonization
- All lab staff trained together with locked SOPs prior to initiating Analytical Validation
- Trained staff performed independent analytical validations in their respective labs



NCI-MATCH Assay Proved Fit for Intended Use




“...the assay tailored for this trial is highly sensitive for detecting genetic mutations from a variety of tumor tissue and, for the first time, has been reproduced with accuracy by multiple clinical laboratories, laying the groundwork for future clinical utility.”

Chih-Jian Lih et al, *The Journal of Molecular Diagnostics*, Vol 19, Issue 2, March 2017



Evolution of NCI-MATCH NGS Assays

- During the course of NCI-MATCH several NGS assays received FDA approval/clearance
- Routine NGS testing with both FDA approved/cleared and LDT's became more accessible
- Insurance coverage was more reliable for certain tests/indications
- Several NCI-MATCH Treatment Arms remained open due to low aMOI hit-rate
- A designated lab network was established to continue screening
 - 29 labs were vetted via assay validation reports & a blinded concordance test
 - Central lab verification was required for first pass clinical outcome assessment



Community Efforts Addressing Assay Accuracy and Comparability

- FOCCR TMB Harmonization Project
- FOCCR ctMONITOR
- FOCCR HRD Harmonization
- FNIH QCM for Predictive ctDNA Assays
- FNIH AML MRD Harmonization
- MDIC Somatic Reference Samples
- AMP
- CAP
- Is there a need for AI Digital Pathology “Reference Materials” and “Cross Assay/Lab Harmonization” efforts?



Thanks for Your Attention!

- AND THANKS TO:
- The PI's of NCI-MATCH and Laboratory and Supporting Staff
- All the enrollment site PIs and Essential site staff
- Most Importantly, All the PATIENTS and their FAMILIES

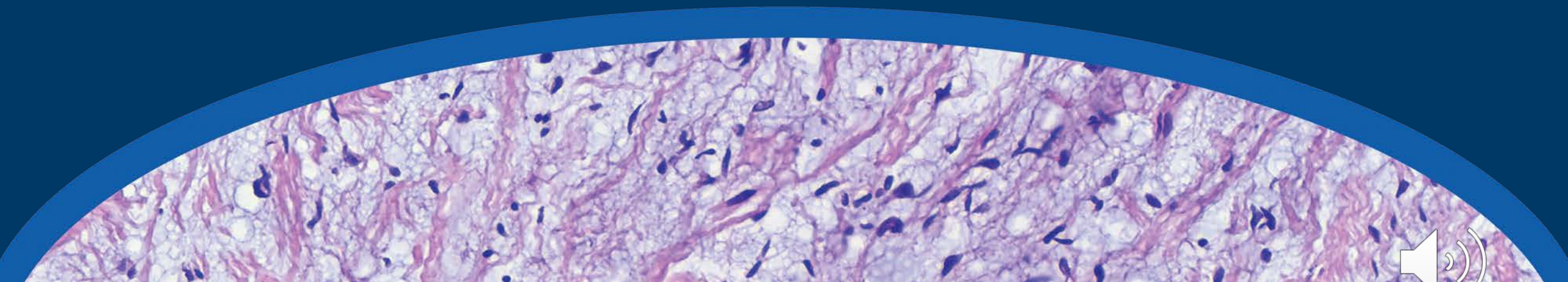


Pre-Analytics & APPIA

Joshua Greenlee, MBA

Senior Product Manager & Laboratory Workflow/ Productivity Strategist

Sakura Finetek USA, Inc





- The Anatomical Pathology Patient Interest Association (APPIA) was founded and incorporated in 2016.
- APPIA is an organization formed by industry partners actively engaged across all phases of anatomical pathology from specimen acquisition, preparation, and examination.
- APPIA's mission is cooperative industry partners dedicated to advancing anatomical pathology to benefit patient care by advocating and fostering quality, education, and best practices.
- APPIA is a resource to those who contribute to quality patient outcomes



APPIA
Anatomical Pathology Patient
Interest Association

TOPS
Tissue Optimization and
Pre-analytic Standardization

- The Tissue Optimization and Pre-analytic Standardization (TOPS) program was APPIA's first education initiative.
- TOPS provides best practice suggestions and guidelines on tissue handling and pre-analytics collected from notable resources in the industry.
- Guidelines are displayed in an easy-to-read infographic for laboratories and education programs.
- Training materials are available focusing on audiences from laboratory personnel to nurses and surgeons.
- Presentations have been given at the National Society of Histotechnology and other society meetings to support continuing education.

General Tissue Handling Guidelines

Best practices for handling specimens from tissue procurement through laboratory diagnostics
Tissue Optimization and Pre-analytic Standardization (TOPS)

Before laboratory:

- 1 Tissue specimen labeling**
 - Specimen label must contain two unique patient identifiers, and the source of specimen.
 - Container should be labeled with the type of fixative used.
 - Ensure label matches patient requisition identification.
- 2 Tissue specimen handling**
 - Use 10% aqueous Neutral Buffered Formalin (NBF) only.
 - The fixative volume to tissue volume ratio should be 10:1 minimum.¹
 - If needed, bleed or open the specimen to ensure complete penetration of the fixative solution or as instructed by the Pathology Laboratory.
 - Ensure that the entire specimen is immersed in the fixative.
- 3 Time to fixation**
 - Limit cold ischemia time to 45 minutes, but never exceed 1 hour.²
 - Specimen should be immersed in fixative immediately at time of collection if possible, or immediately upon receipt at the laboratory if transported fresh.
 - Document and record time of collection and start time of fixation (time 0).
 - Proper fixation preserves specimen integrity and enables optimal tissue preservation and quality.
 - Formalin penetrates tissues quickly (approx. 1mm per hour) but fixes slowly. If needed, specimens need to be opened, incised or sliced in the laboratory and left to fix for an adequate period of time prior to processing.
- 4 Tissue specimen storage and transportation**
 - Do not store specimens overnight at room temperature or at 4°C without fixative solution.³
 - Fresh specimens should be transported to the lab immediately.
 - Ensure that the specimen is transported via cooler at ambient temperature (18°-25°C).

In laboratory:

- 5 Tissue processing and in-lab fixation**
 - Depending on tissue type/size, slice at 5-10 mm intervals (red bars) after inspection/ margin designation and immersion in fixative.⁴
 - Specimens placed into cassettes must be "nickel thick" (2-3 mm max.).
 - Verify that labeling of the tissue cassette matches the identifier(s) on the specimen container.
 - Verify the number of specimens vs. the requisition, document any discrepancies.
- 6 Duration of fixation**
 - Total fixation time in 10% NBF at room temperature is no less than 6 hours, and no greater than 72 hours for most tissues, including fixation time on the tissue processor.^{1,5}
 - Fatty tissues may be fixed up to 48 hours or, as noted for some breast markers, up to 72 hours.^{1,6}
 - Under-fixation is a greater concern than over-fixation for all routine and IHC testing.⁷
- 7 Tissue processing**
 - Use an optimized, laboratory-validated processing protocol that is specific for that tissue type/size.
 - Gradual dehydration through graded alcohols yields best results.
 - Monitor reagent usage and follow the lab's validated reagent exchange protocol to ensure proper reagent efficacy.
 - All processing protocol and instrument temperatures should be monitored and recorded daily.
- 8 Tissue embedding**
 - Ensure proper tissue orientation following in-lab protocols.
 - Ensure only a single patient cassette is embedded at a time to reduce errors.
 - Confirm tissue specimen counts and other special instructions from grosser, document any discrepancies.
 - Properly clean forceps, embedding molds and embedding system between cassettes to avoid tissue cross contamination.
 - All embedding protocols and instrument temperatures should be monitored and recorded daily.
- 9 Microtomy**
 - Microtome must be cleaned between each block to reduce tissue cross-contamination.
 - Use a clean, sharp blade for best sections or "ribbons".
 - Cut sections at 4-5µm for routine staining.
 - Use charged slides for special stains and IHC/IHIF.
 - Verify that labeling of the slide matches the identifier(s) on the tissue cassette.
 - Fixation water bath must be cleaned between each block to reduce tissue cross-contamination.
 - Oven dry at 56°-60°C for no more than 1 hour⁸ or air dry at ambient temperature of 18°-25°C overnight.
 - Ensure section is a full face of the tissue block and free of holes, folds, tears, wrinkles, other artifacts.
- 10 Slides and block storage**
 - Paraffin blocks and slides should be stored in a temperature and humidity-controlled environment.
 - Store slides and blocks for a minimum of 10 years per local and national guidelines.

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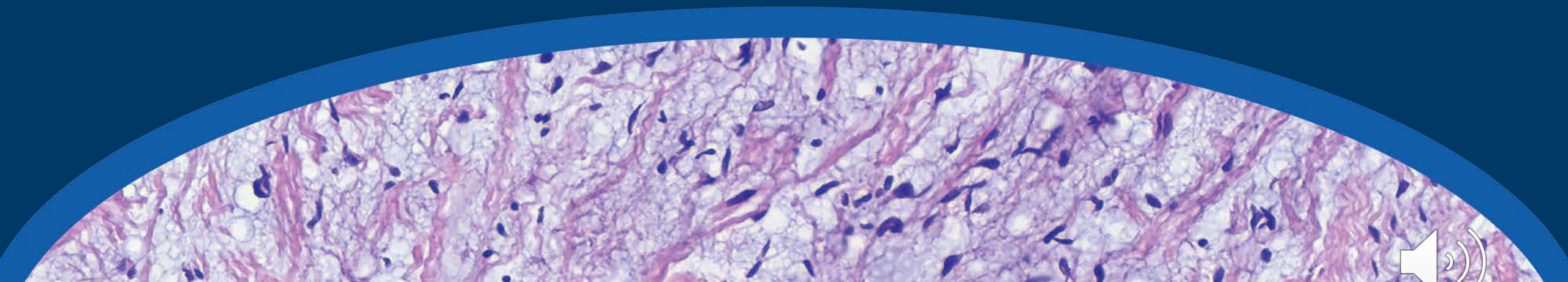
1. Henderson M, Harris D, Duggan M, et al. American Society of Clinical Oncology. College of American Pathologists academic recommendations for microtomy. *Journal of the American College of Surgeons*. 2016;122(4):511-517.
2. Kwon J, Lee J, Chung H, et al. Impact of fixation time on immunohistochemical staining. *Journal of the American College of Surgeons*. 2016;122(4):511-517.
3. CLIA. Quality Improvement for Tissue Procurement and Processing. *Standard Edition*. 2018. Revised 3/2/2018. Slide 24.
4. National Cancer Center. *Practical Immunohistochemistry*. 2nd ed. New York, NY: Springer-Verlag; 2008. 2008.
5. CLIA. Quality Improvement for Tissue Procurement and Processing. *Standard Edition*. 2018. Revised 3/2/2018. Slide 24.
6. CLIA. Quality Improvement for Tissue Procurement and Processing. *Standard Edition*. 2018. Revised 3/2/2018. Slide 24.
7. CLIA. Quality Improvement for Tissue Procurement and Processing. *Standard Edition*. 2018. Revised 3/2/2018. Slide 24.
8. CLIA. Quality Improvement for Tissue Procurement and Processing. *Standard Edition*. 2018. Revised 3/2/2018. Slide 24.

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Find us on LinkedIn at <https://www.linkedin.com/company/appiagroup/>



Panel Discussion/ Q&A

Moderated by: Mark Stewart

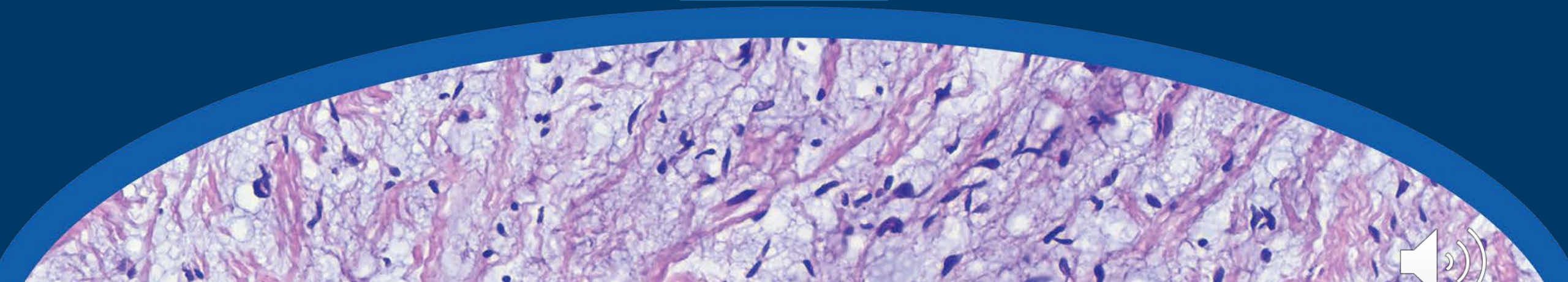




Lunch Break

Sponsored by:

Roche

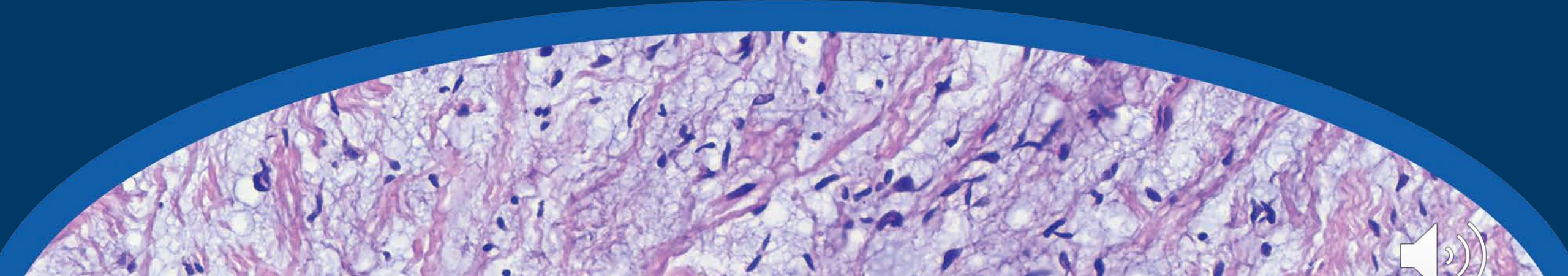




Key Note 1: A Vision for Digital Pathology and AI

Thomas Fuchs

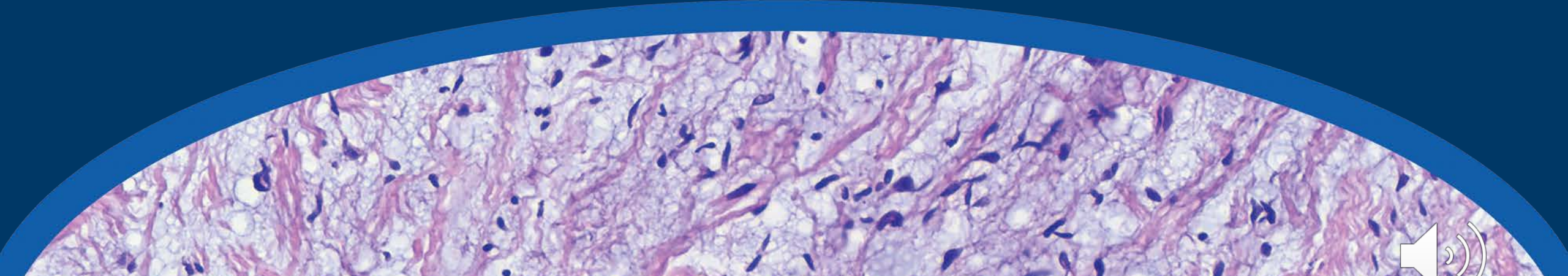
Founder and Chief Scientist, Paige





The Journey to Precision Pathology

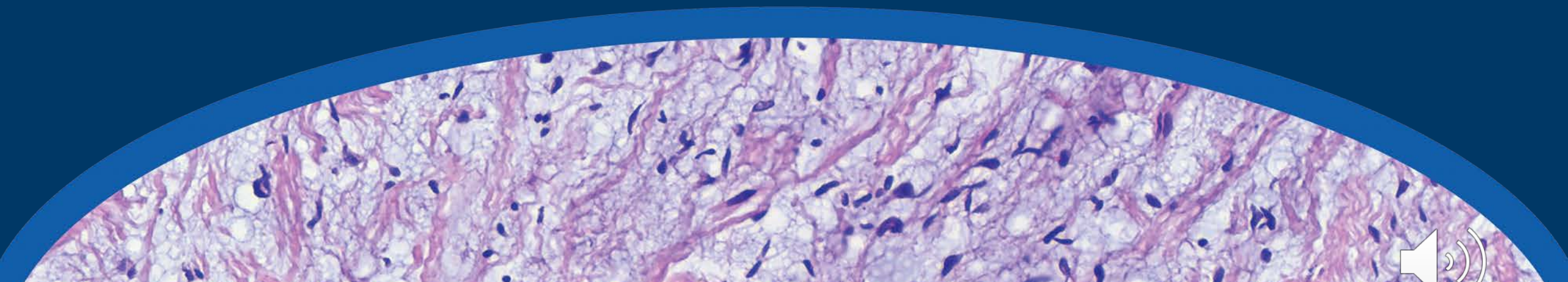
Mariano de Socarraz
CEO, CorePlus

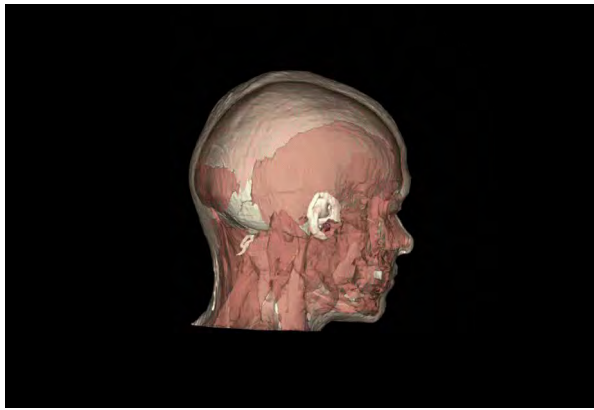




Session 3:
FDA Research at OSEL & Update on PCCP from DHCoE

Moderated by:
Ed Margerrison





Accelerating Medical Device Innovation with Regulatory Science Tools

Office of Science and Engineering Labs (OSEL)

Center for Devices and Radiological Health (CDRH)

U.S. Food and Drug Administration (FDA)



CDRH's Office of Science and Engineering Labs

165
FEDERAL EMPLOYEES
Up to 180 visiting scientists

140 Research
Projects
In 20 Program Areas

400/year
Peer-reviewed presentations, articles,
and other public disclosures

> 3,000/year
Premarket
regulatory reviews

75
Standards and
conformity assessment
committees

70%
Staff with a
graduate degree

55,000 ft²
Lab facilities

OSEL Regulatory Science Program Areas

- Advanced Patient Monitoring and Control
- AR/VR - extended reality (XR)
- Artificial Intelligence (AI) / Machine Learning
- Biocompatibility/Toxicology
- Cardiovascular
- Computer Modeling and Simulation
- Digital Pathology
- Electromagnetic and Electrical Safety
- Emergency Preparedness
- Human Device Interaction
- Materials Performance
- Medical Imaging and Diagnostics
- Microfluidics
- ~~Nanotechnology~~
- Neurology
- Ophthalmology
- Orthopedic Devices and Additive Manufacturing
- Post Market Signal Response
- Sterility and Infection Control
- Therapeutic Ultrasound

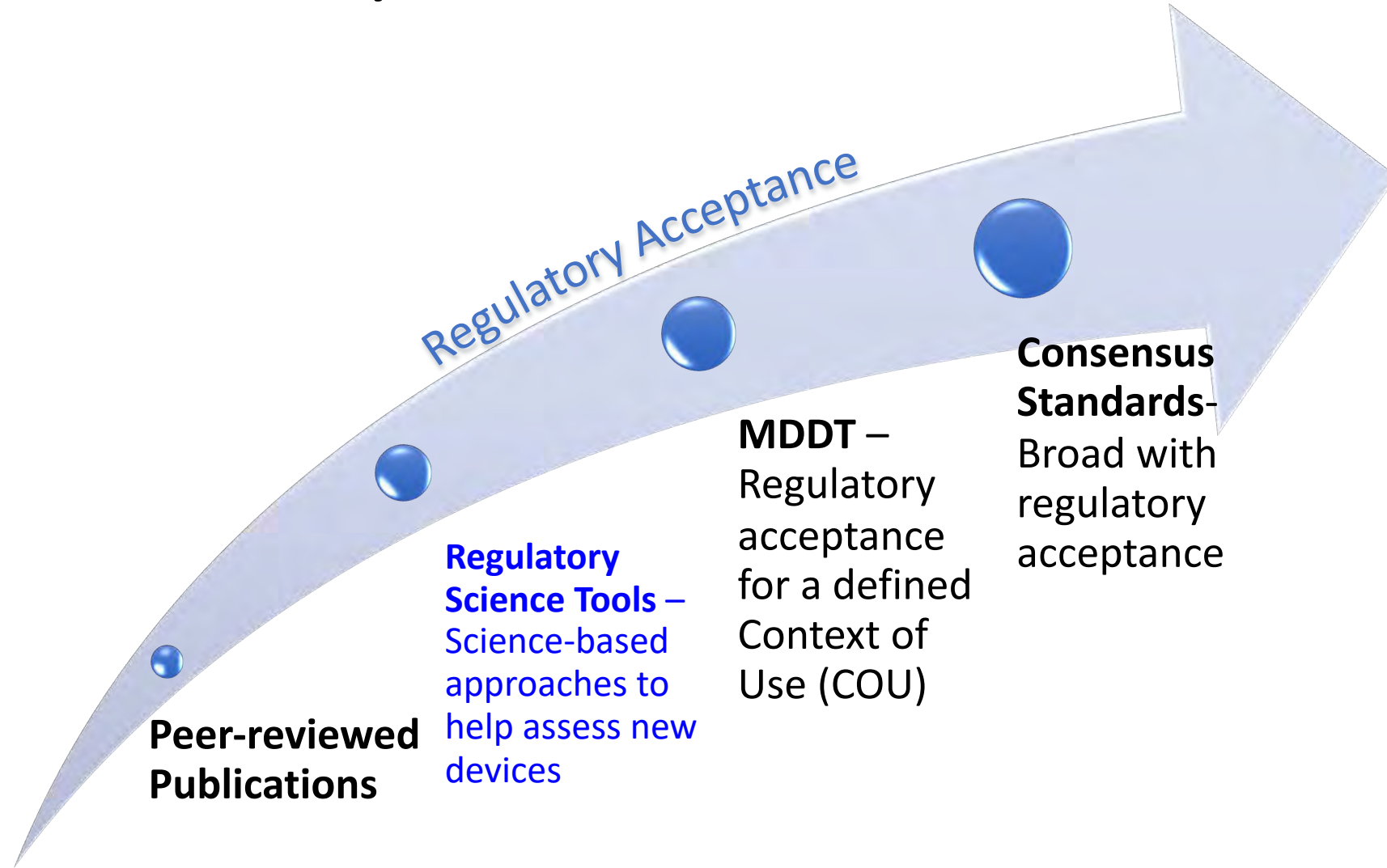


OSEL's Focus on Regulatory Science Tools

- OSEL develops Regulatory Science Tools (RSTs), which are innovative, peer-reviewed approach or methodology to help assess the safety or effectiveness of a medical device or emerging technology
 - Brought into the public domain as early as possible before standards may be available
- We have identified a number of types
 - Virtual and physical phantoms
 - CM&S and related datasets
 - Lab methodologies
 - Best practices



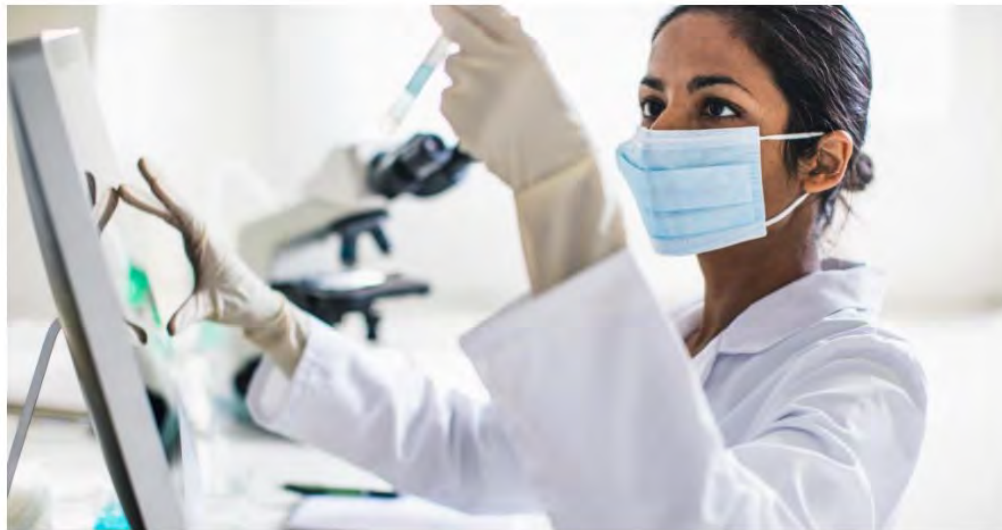
The Family of Device Assessment Tools



More than 140 RSTs published

Catalog of Regulatory Science Tools to Help Assess New Medical Devices

[Share](#)
[Tweet](#)
[LinkedIn](#)
[Email](#)
[Print](#)



<https://www.fda.gov/medical-devices/science-and-research-medical-devices/catalog-regulatory-science-tools-help-assess-new-medical-devices>

Phantoms

Search: Export Excel

Phantom Name	Description	Type	Areas	Reference
3D printed phantom material and design with tissue-relevant Raman signature	A tool for performing Raman spectroscopy measurements on a well-characterized 3D-printed sample that has tissue-simulating	Physical	Medical imaging	Article
Blood Mimicking Fluid for High Intensity Focused Ultrasound				
Digital models of retinal vasculature for a clinical fundus camera image				
Microcalcification templates				
Nanostructured Virus-simulating Microstructures for Evaluating Optical Biosensing Methods				
Parchment breast phantom				
Phantom for assessing performance of infrared hematoma detectors				

Methods

Search: Export Excel

Method Name	Description	Type	Areas	Reference
Approach to Validate Simulation-Based Distributions	A method to validate simulation data using meaningful agreement metrics which offer a natural way to visually localize	Lab Method	Credibility assessment in modeling	Article
Assessing texture reproduction of camera-phone-based medical devices				
Automated Rapid Accelerated Aging (Automated RAA)				
Battery of image quality test methods for evaluation of fluorescence imaging systems				
Benchmark problems for verifying cardiac electrophysiological models				
Confocal Laser Methods (CLM) for quantitative evaluation of dioptric power characteristics of intraocular lens (IOL) implants				
Considerations for Accelerated Wear Durability Testing for Transcatheter Heart Valves				

Computational Models and Simulations

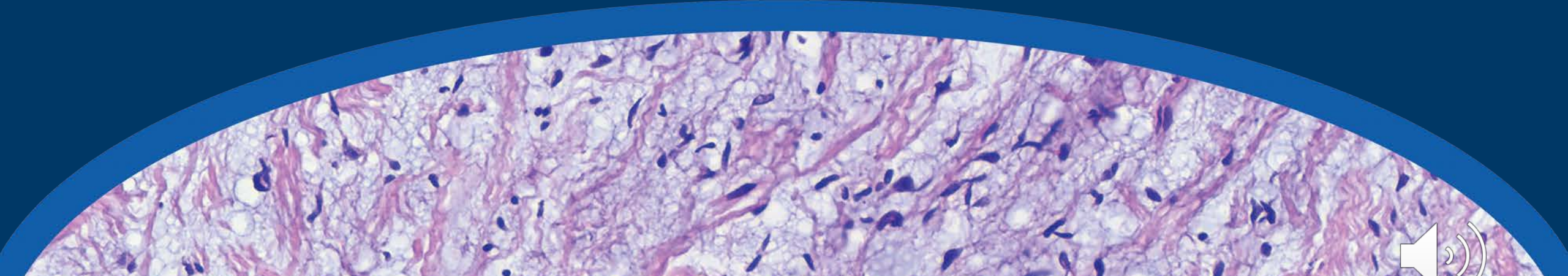
Search: Export Excel

Model or Simulation Name	Description	Type	Areas	Reference
Benchmark Datasets for Validation of Computational Fluid Dynamics Models	Experimental datasets of velocity and pressure on simplified medical devices used to validate computational fluid dynamic (CFD) models	Dataset	Cardiovascular	Wiki
Benchmark PIV Dataset for Laminar Flow in an Anatomically Realistic IVC	Velocity and hemolysis datasets to improve the predictive capability of CFD simulations in the evaluation of medical devices.	Dataset	Cardiovascular	Article Article
CFD/gDOF Model of Clot Transport and Capture in an IVC Filter	A computer simulation for prediction of the capture efficiency of IVC filters	Model	Cardiovascular	Article Article
CHRIS: Color Hazard and Risk Calculator	Rapid (screening level) risk assessments of color additives in medical devices	Model	Biocompatibility/toxicology Orthopedics	Article
Color Scale Study Data	Color scale study repository for Cardiac CT and Prostrate MRI Studies	Model	Artificial intelligence/machine learning	GitHub
Computational model of the human cardiac action potential	Model and software of the human action potential appropriate for simulating arrhythmia initiation in human hearts	Model	Cardiovascular	Article Code
Computational model of the rabbit cardiac action potential	Parsimonious (reduced complexity) model and software of the rabbit action potential amenable to large scale simulations of arrhythmias	Model	Cardiovascular	Article Code
Computational modeling comparisons of ASTM F2182 test	Technical considerations when using the modeling analog of the ASTM F2182	Model	Electromagnetic and electrical safety	Article



FDA Talk 2: Regulatory Science Projects In OSEL's Digital Pathology Program

Brandon Gallas
OSEL/CDRH



REGULATORY SCIENCE PROJECTS IN OSEL'S DIGITAL PATHOLOGY PROGRAM

Brandon D. Gallas

FDA liaison to Plcc!

Division of Imaging, Diagnostics, Software Reliability (DIDSR)

Office of Science and Engineering Laboratories (OSEL)

Center for Devices and Radiological Health (CDRH)

U.S. Food and Drug Administration (FDA)

Disclaimers

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- This is a contribution of the U.S. Food and Drug Administration and is not subject to copyright.

Introduction

- Introduce
 - DIDSR digital pathology program
 - Digital pathology landscape
- Digital pathology gaps and efforts
 - Technical performance
 - Computational pathology
 - Role of the pathologist
- Hidden slides offer more details for Q&A



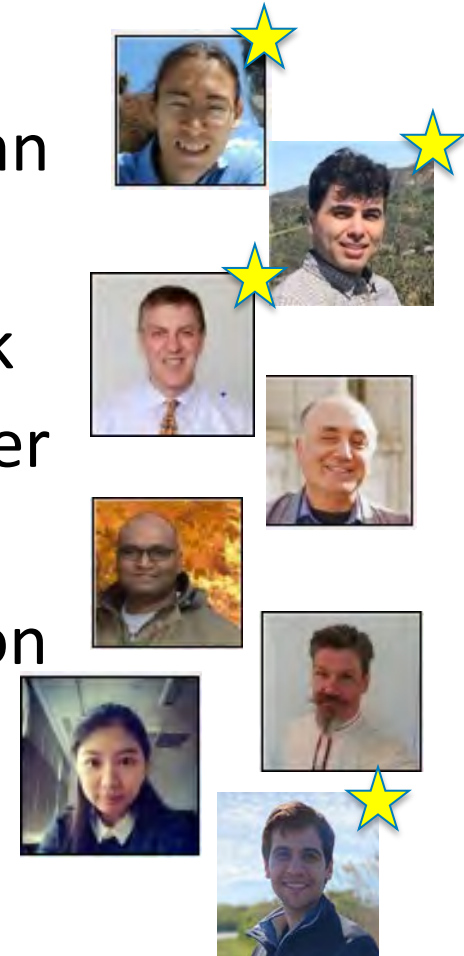
OSEL Digital Pathology Team

- Anant Agrawal
- Arian Arab
- Aldo Badano
- Kenny Cha

- Wei-Chung Cheng
- Weijie Chen
- Katherine Elfer
- Brandon Gallas



- Alexej Gossmann
- Seyed Kahaki
- Nicholas Petrick
- Berkman Sahiner
- Ravi Samala
- Frank Samuelson
- Si Wen
- Victor Garcia



21 Research Fellows
+ 13 Summer Fellows

OSEL Digital Pathology Team

- Research projects
- Regulatory support

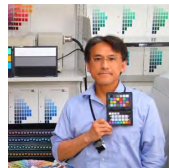
- Anant Agrawal
- Arian Arab



- Seyed Kahaki



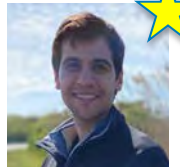
- Wei-Chung Cheng
- Weijie Chen



- Brandon Gallas



- Si Wen
- Victor Garcia

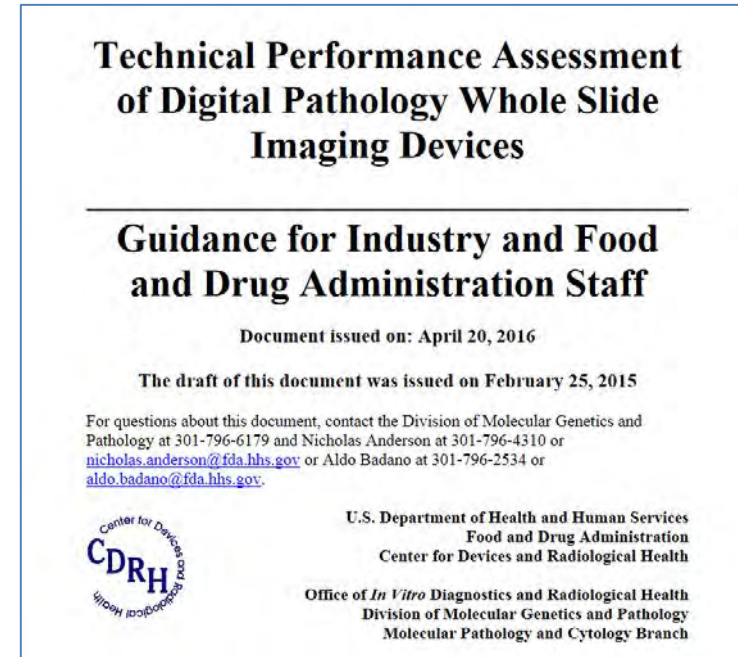


Regulatory Landscape

- **Technical Performance Assessment**
 - TPA Guidance issued 2016
 - Increase clarity and performance requirements

Digital Pathology is in its infancy (2017)

- Clearance required clinical studies with thousands of cases plus analytical studies and bench tests
- Clearance covered end-to-end system
- Components cleared as separate products
 - PSY: Whole slide imaging system
 - QKQ: Digital pathology image viewing and management software
 - PZZ: Digital Pathology Display



510(k) database – PSY

<https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm>

U.S. Department of Health & Human Services

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FDA U.S. FOOD & DRUG ADMINISTRATION

Home Food Drugs Medical Devices Radiation-Emitting Products Vaccines, Blood & Biologics Animal & Veterinary Cosmetics Tobacco Products

510(k) Premarket Notification

FDA Home Medical Devices Databases

1 to 8 of 8 Results
ProductCode: psy Decision Date To: 06/25/2023

Results per Page 10

New Search [Export to Excel](#) [Download Files](#) [More About 510\(k\)](#)

Device Name	Applicant	510(K) Number	Decision Date
Nanozoomer S360md Slide Scanner System	Hamamatsu Photonics K.K.	K213883	09/27/2022
Dynamyx Digital Pathology Software	Inspirata, Inc.	K210811	03/01/2022
Philips Intellisite Pathology Solution	Philips Medical Systems Nederland B.V.	K203845	09/17/2021
Mdpc-8127	Barco NV	K203364	04/15/2021
Fullfocus	Paige.AI, Inc	K201005	07/15/2020
Philips Intellisite Pathology Solution	Philips Electronics Nederland B.V.	K192259	09/20/2019
Aperio At2 Dx System	Leica Biosystems Imaging, Inc.	K190332	05/20/2019
Philips Intellisite Pathology Solution	Philips Medical Systems Nederland B.V.	K172174	10/04/2017

PSY: WSI system

QKQ: WSI Viewer

PZZ: WSI Display

Regulatory Landscape

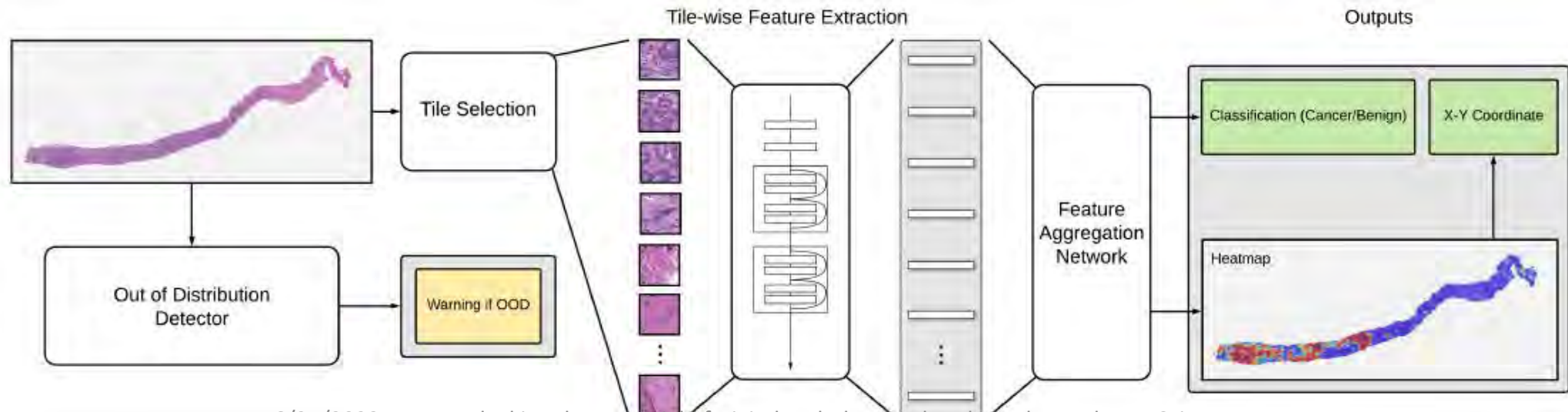


- **Paige Prostate**
 - DEN200080, authorized 09/21/2021
 - first AI-based software for identifying an area of interest on the prostate biopsy image with the highest likelihood of harboring cancer so it can be reviewed further by the pathologist.
 - Analytical device performance
 - Bench testing: standalone performance
 - Precision study: intra-site and inter-site agreement
 - Clinical reader study
 - 16 readers, 190 Ca + 420 benign cases

<https://www.fda.gov/news-events/press-announcements/fda-authorizes-software-can-help-identify-prostate-cancer>



For Immediate Release: September 21, 2021



REVIEW

Regulatory considerations for medical imaging AI/ML devices in the United States: concepts and challenges

Nicholas Petrick^{a,*}, Weijie Chen,^a Jana G. Delfino^a, Brandon D. Gallas^a,
Yanna Kang,^b Daniel Krainak,^b Berkman Sahiner,^a and Ravi K. Samala^a

^aU.S. Food and Drug Administration, Center for Devices and Radiological Health, Office of Science and
Engineering Labs, Silver Spring, Maryland, United States

^bU.S. Food and Drug Administration, Center for Devices and Radiological Health, Office of Product Evaluation
and Quality, Silver Spring, Maryland, United States

Collaborations With Academia

- **Research Collaboration Agreements**
- **Collaborators from academia**
 - Faisal Mahmood, Harvard Medical School
 - AI/ML, Data sharing, research collaboration
 - Jan Hagemann, Washington University
 - AI/ML, Data collection, research collaboration
 - Ryan Sochol, University of Maryland
 - TIL, Phantom development
 - Uziel Sants, Stony Brook University
 - HTI, Slide sourcing, Victor Garcia has volunteer status at SB
 - Bill Li, Emory
 - HTI, Slide sourcing, Hiring OHSU help at Emory
 - Kim Birnman, Yale
 - HTI, creating an OHSU research pool at Yale

External Collaborations - Standards

- **DICOM**
 - Activity: WG26 Digital Pathology
 - Supplement: Sup145, Sup222
- **IEC TC62/SC62B**
 - Activity: WG51 Evaluation methods for colour displays
 - Standard: IEC 62563 Medical image display systems

External Collaborations

- **Pathology Innovation Collaborative Community**
 - Activity: Monthly meetings with exchange and discussions about regulatory pathways, programs, and research
- **International Immuno-Oncology Working Group**
 - Roberto Salgado's "TILs in Breast Cancer" experts
- **W.H.O. - IC3R**
 - International Collaboration for Cancer Classification and Research

Share and receive feedback on projects, including clinical expertise

External Collaborations

- **Friends of Cancer Research**
 - White Paper: Digital Pathology and AI/ML in Drug Development
- **BigPicture**
 - A central repository of digital pathology slides to boost the development of artificial intelligence
- **Imaging Data Commons**
 - Enabling access, visualization, and analysis in multi-modal imaging data science

HTT Collaborators (Current and Past)

<ul style="list-style-type: none"> – Wenbin Angot, MD, PhD – Eric Blomgren, PhD – Wenbin Angot, MD, PhD – Eric Blomgren, PhD – Wenbin Angot, MD, PhD – Eric Blomgren, PhD – Wenbin Angot, MD, PhD – Eric Blomgren, PhD – Wenbin Angot, MD, PhD – Eric Blomgren, PhD – Wenbin Angot, MD, PhD – Eric Blomgren, PhD – Wenbin Angot, MD, PhD – Eric Blomgren, PhD – Wenbin Angot, MD, PhD – Eric Blomgren, PhD 	<ul style="list-style-type: none"> – Wenbin Angot, MD, PhD – Eric Blomgren, PhD – Wenbin Angot, MD, PhD – Eric Blomgren, PhD – Wenbin Angot, MD, PhD – Eric Blomgren, PhD – Wenbin Angot, MD, PhD – Eric Blomgren, PhD – Wenbin Angot, MD, PhD – Eric Blomgren, PhD – Wenbin Angot, MD, PhD – Eric Blomgren, PhD – Wenbin Angot, MD, PhD – Eric Blomgren, PhD – Wenbin Angot, MD, PhD – Eric Blomgren, PhD
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Pathologists, Academia, Industry, International

Villanova



Primary Digital Pathology Research Areas

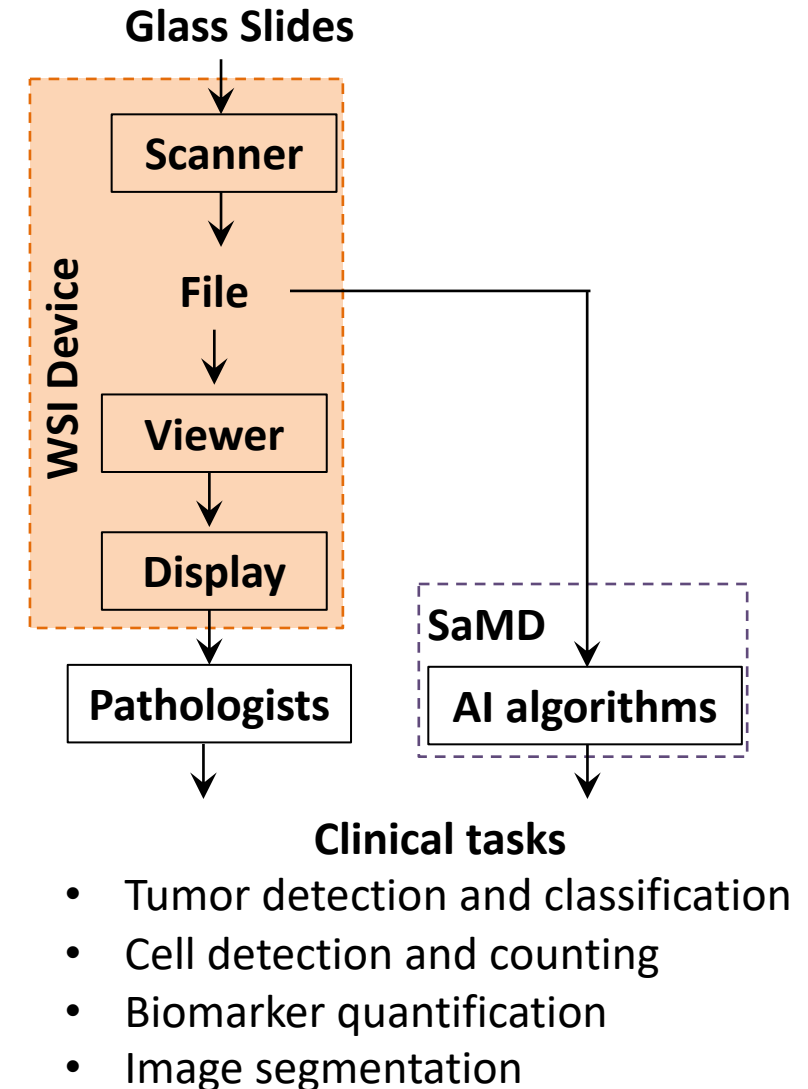
- Technical performance assessment
- Computational pathology
- Role of the pathologist

Technical Performance Assessment



Gaps

- Need methods to demonstrate interoperability between scanners and viewers
- Need to understand image quality along the pipeline
- Need data demonstrating correlation between technical performance and clinical performance (scanning and display)



Technical Performance Assessment



Wei-Chung Cheng

Tool to Compare WSI Viewers

Evaluating whole-slide imaging viewers used in digital pathology
Wei-Chung Cheng, Tzong-Long Q. Hoang, and Paul L. Jacobitz, Food and Drug Administration, Silver Spring, Maryland, USA

- Method to extract patches
- Software to compare patches
 - Visual: heatmaps
 - Quantitative Color Differences

6/27/2023: P1cc - Unlocking the Potential of Digital Pathology and AI through Regulatory Science

Technical Performance Assessment Efforts

- Develop test methods for interoperable systems and guidelines for interface specifications.
 - Understaffed. Need help.
- Develop phantoms and novel test methods to enable the assessment of key performance characteristics of WSI scanner, viewer, and display
 - Understaffed. Need help.
- Develop quantitative approaches for determining minimum performance requirements
 - Promote quantitative approaches for displays: optical bench tests, QA/QC procedures for end users.
 - Leveraging existing efforts by international experts by working with IEC TC62B/WG51

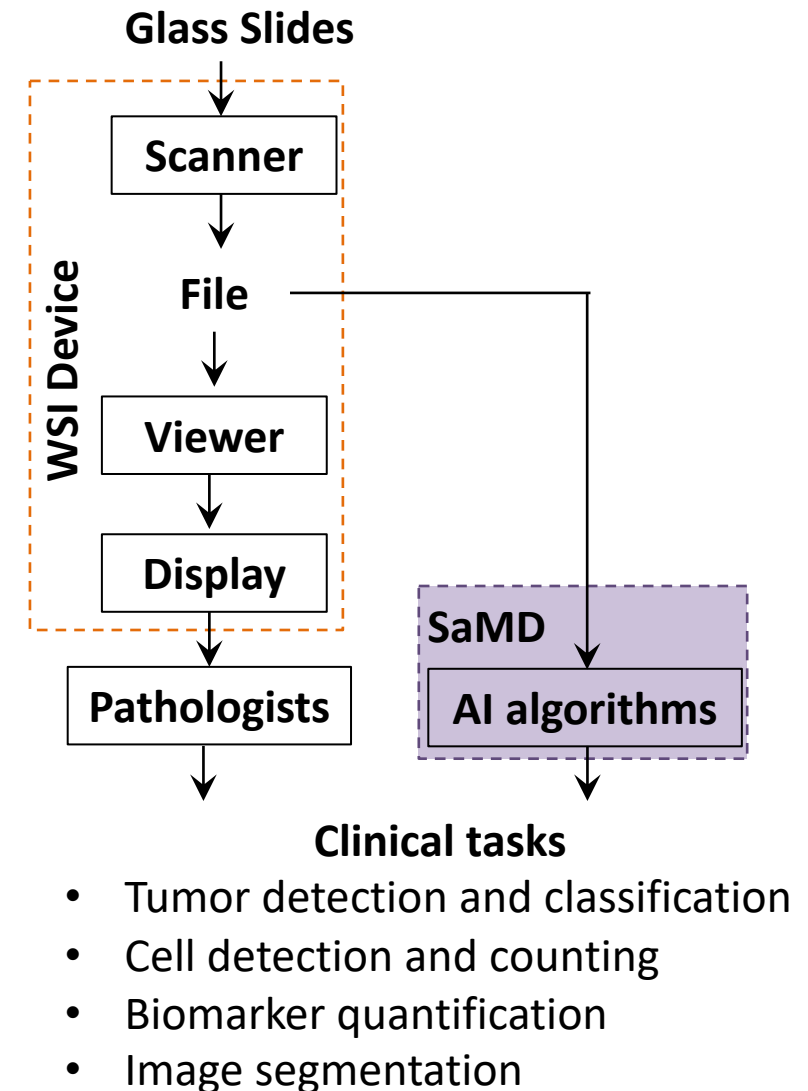
6/27/2023: P1cc - Unlocking the Potential of Digital Pathology and AI through Regulatory Science

Computational pathology



Gaps

- Need standardized statistical methods to assess AI/ML models
- Need methods to treat noisy and incomplete reference standard labels
- Need to understand generalizability of AI/ML models
 - Sites, slide prep, scanners/imaging
 - Standardized datasets
- Need template to report AI/ML architecture and development elements



Computational pathology



Seyed Kahaki




Weijie Chen

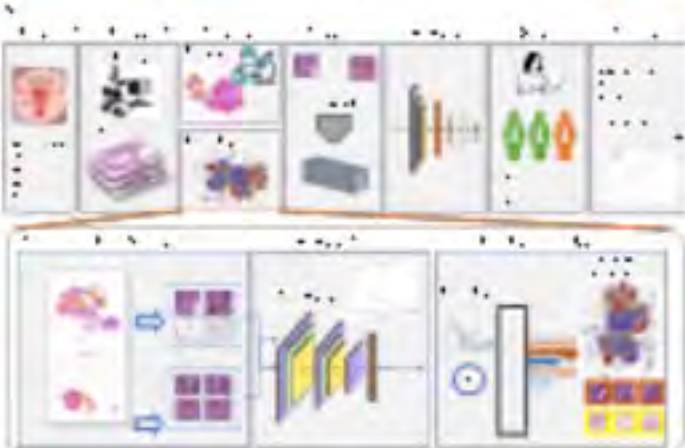


Arian Arab

Use case for regulatory science research



- Histopathology Image Transformation for Predicting the Response to Hormonal Treatment (Endometriosis)
- Data collection:
 - Washington University: 50 slides, two scanners, pathologist annotation, clinical data
 - University of Oklahoma
- Development pipeline and model are tools that permit research on
 - Weakly labeled training data
 - Generalizability across scanners and clinical sites
- Tool: Checklist to report AI/ML architecture and development elements
- Tool: Performance assessment software




6/27/2023: P1cc - Unlocking the Potential of Digital Pathology and AI through Regulatory Science

OSEL Accelerating patient access to innovative, safe, and effective medical devices through best-in-the-world regulatory science

Seyed Kahaki

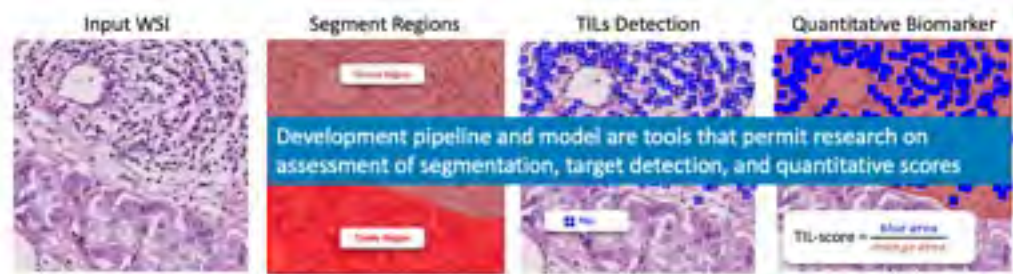
Use case for regulatory science research



TIGER

Tumor Infiltrating Lymphocytes in Breast Cancer

- Tumor-infiltrating lymphocytes (TILs) are a potentially useful **quantitative biomarker**.
- TiGER: first public challenge to evaluate computer algorithms for the automated assessment of TILs
 - H&E WSIs of HER2+ and triple-negative breast cancer (TNBC) patients.



Development pipeline and model are tools that permit research on assessment of segmentation, target detection, and quantitative scores

TIL-score = $\frac{\text{Blue area}}{\text{Total area}}$

6/27/2023: P1cc - Unlocking the Potential of Digital Pathology and AI through Regulatory Science

OSEL Accelerating patient access to innovative, safe, and effective medical devices through best-in-the-world regulatory science

Use case for regulatory science research



- Histopathology Image Transformation for Predicting the Response to Hormonal Treatment (Endometriosis)

• Data collection:

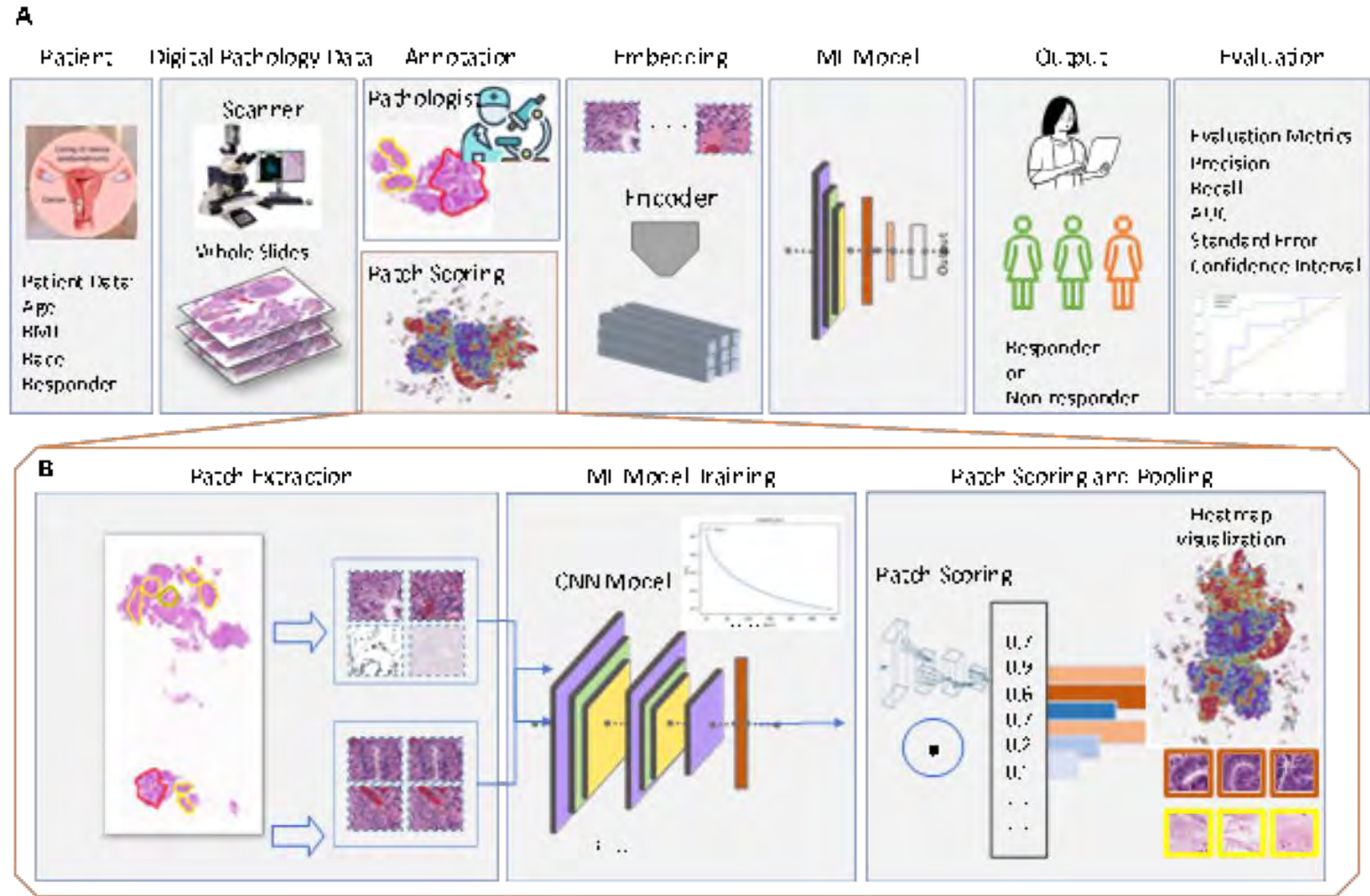
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- Tool: Performance assessment software

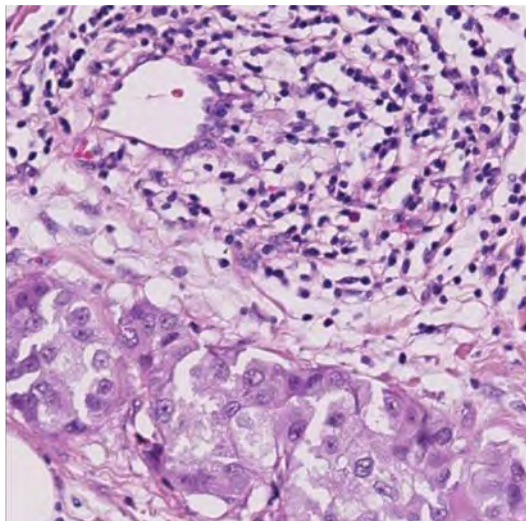


Use case for regulatory science research



- Tumor-infiltrating lymphocytes (TILs) are a potentially useful **quantitative biomarker**.
- TiGER: first public challenge to evaluate computer algorithms for the automated assessment of TILs
 - H&E WSIs of HER2+ and triple-negative breast cancer (TNBC) patients.

Input WSI



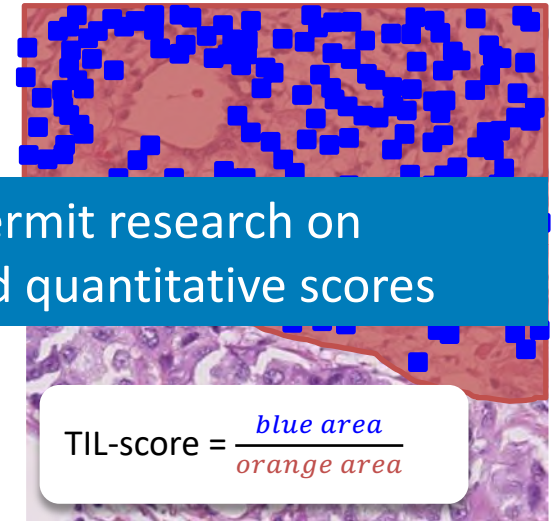
Segment Regions



TILs Detection



Quantitative Biomarker



Development pipeline and model are tools that permit research on assessment of segmentation, target detection, and quantitative scores

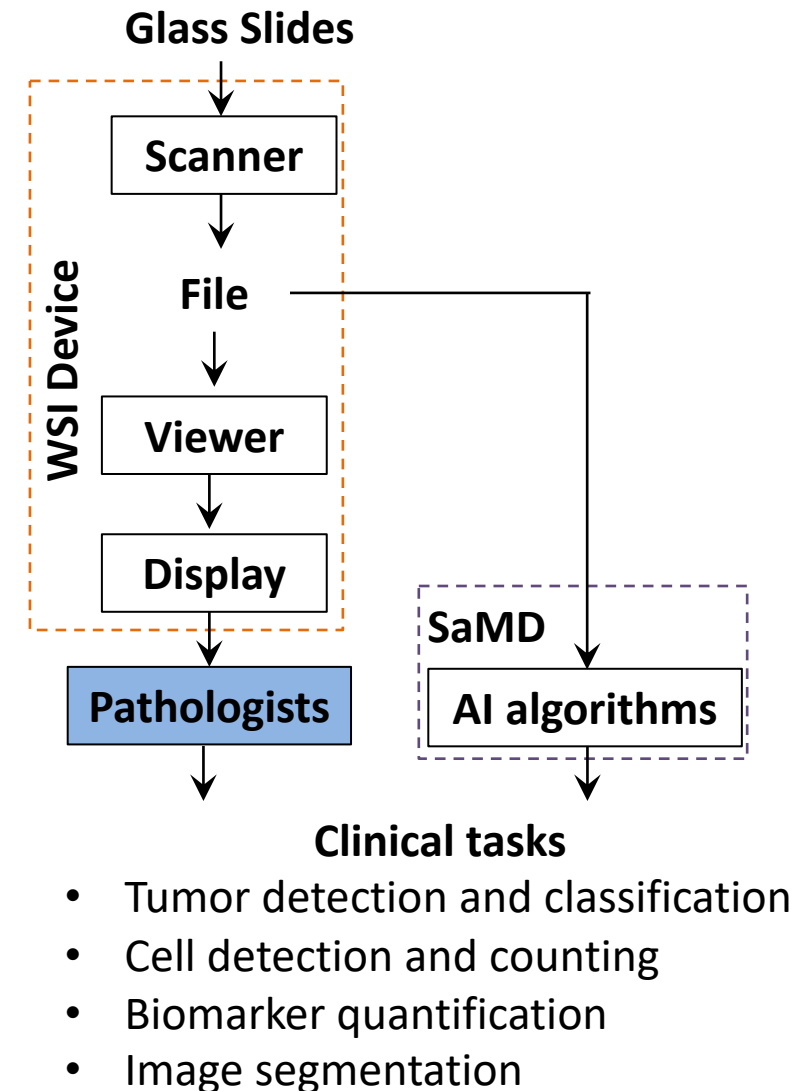
*C. Denkert et al., "Tumour-infiltrating lymphocytes and prognosis in different subtypes of breast cancer: a pooled analysis of 3771 patients treated with neoadjuvant therapy", The Lancet Oncology, 19, 2018, 40-50.

Role of the pathologist



Gaps

- Need methods to account for variability from pathologists
 - End users and reference standard
 - Detection/classification, quantitative measurements, segmentations
- Need template to report methods to determine the reference standard by panel of pathologists
- Need software and performance report templates

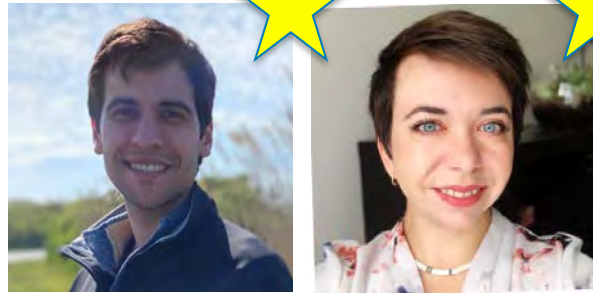


High-Throughput Truthing Project (HTT)



Brandon Gallas

Si Wen



Victor Garcia

Kate Elfer

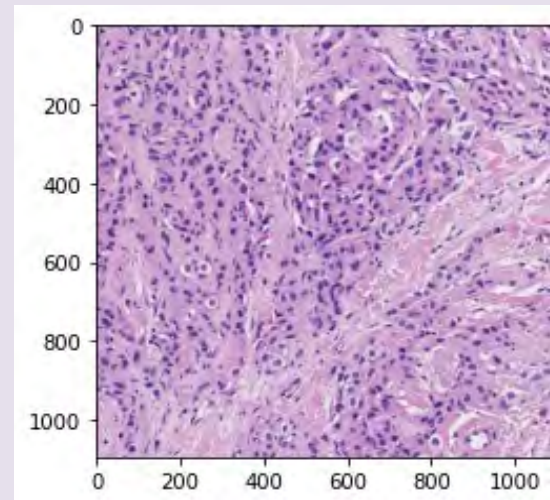


Emma Gardecki

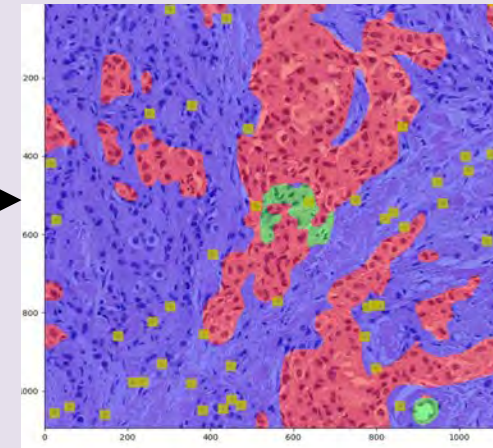
Ryan Birmingham

Reference-Standard Dataset

Slides, Images, Pathologist Annotations
Pivotal Study -> Validate AI/ML Models



AI/ML



HTT Pivotal Study is LIVE!



- Help get the word out to pathologists that specialize in breast cancer and other stakeholders
 - Contact Brandon.Gallas@fda.hhs.gov

HTT data-collection tools and data

Annotation Platforms

- Microscope
- Digital Mode:
 - caMicroscope
 - PathPresenter

Pilot study: Data and Analysis Methods Publicly Shared

Understand, Reduce, and Account for Pathologist Variability

HTT Pathologist Training

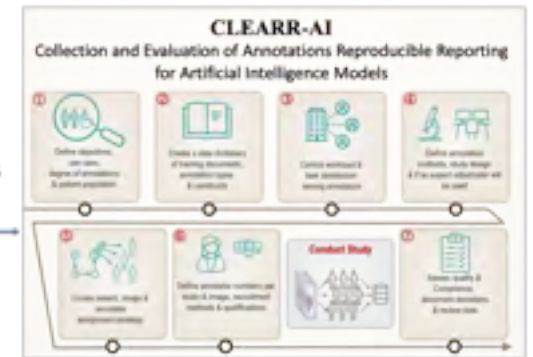
CME course - <https://portal.fda.gov/>

Interactive Training: Feedback and Proficiency Tests

- Each pathologist gets performance report
 - Feedback and proficiency tests
 - Must pass proficiency test to participate in pivotal study
 - Basis for statistical analysis plan
 - Model-expert agreement vs. expert-expert agreement

HTT Protocols

- Clinical metadata paper (chart review)
- ROI selection and batch creation protocols
 - Study population – Clinical population
 - Demographics, disease severity, biomarker range
- CLEAR-AI
 - Demonstrate report with HTT study specifics
- Statistical analysis plan
 - Under development



Summary



- Introduce
 - DIDSR digital pathology program
 - Digital pathology landscape
- Digital pathology gaps and efforts
 - Technical performance
 - Computational pathology
 - Role of the pathologist
- Lots of opportunities to address gaps.
- We are here to discuss and collaborate
- Q&A: Visit hidden slides?
- **What is Regulatory Science?**

The science of developing new tools, standards, and approaches to assess the safety, efficacy, quality, and performance of all FDA-regulated products.

<https://www.fda.gov/science-research/science-and-research-special-topics/advancing-regulatory-science>
- Unofficial: Development and **standardization** of data, tools and methods that **generalize** across biomarkers, devices, and diseases

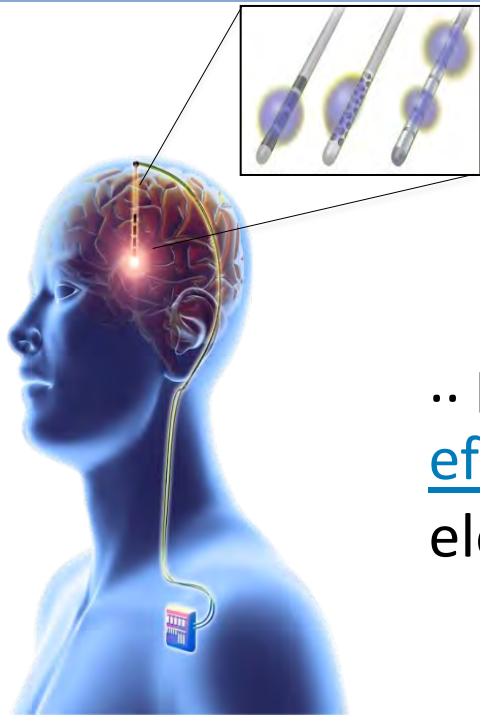
Tools



- Accelerating Medical Device Innovation with Regulatory Science Tools
 - <https://www.fda.gov/news-events/fda-voices/accelerating-medical-device-innovation-regulatory-science-tools>
 - <https://cdrhhome.fda.gov/spaces/1/cdrh-news/articles/feature/4158/regulatory-science-tools-to-accelerate-medical-device-innovation>
- Medical Device Development Tools (MDDT)
 - <https://www.fda.gov/medical-devices/medical-device-development-tools-mddt>
- Catalog of Regulatory Science Tools
 - <https://www.fda.gov/medical-devices/science-and-research-medical-devices/catalog-regulatory-science-tools-help-assess-new-medical-devices>

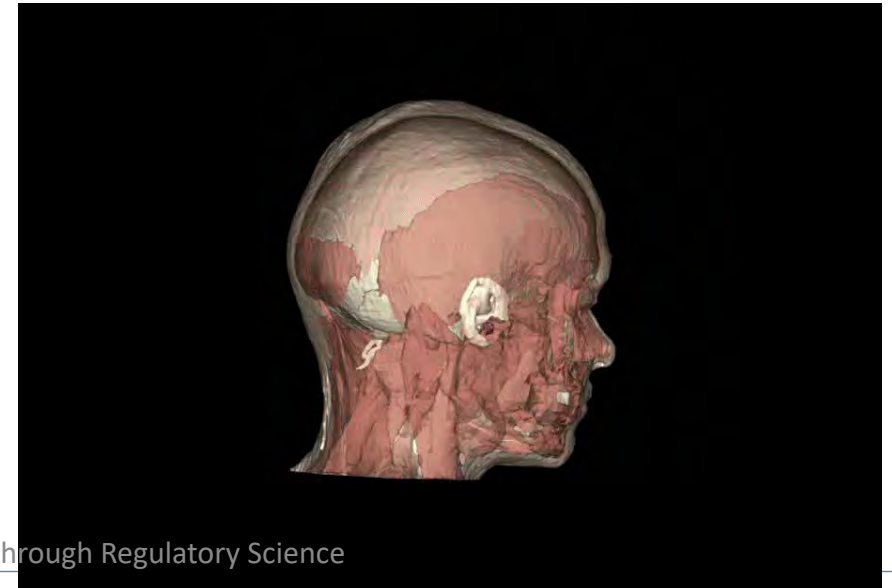
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CDRH Mission

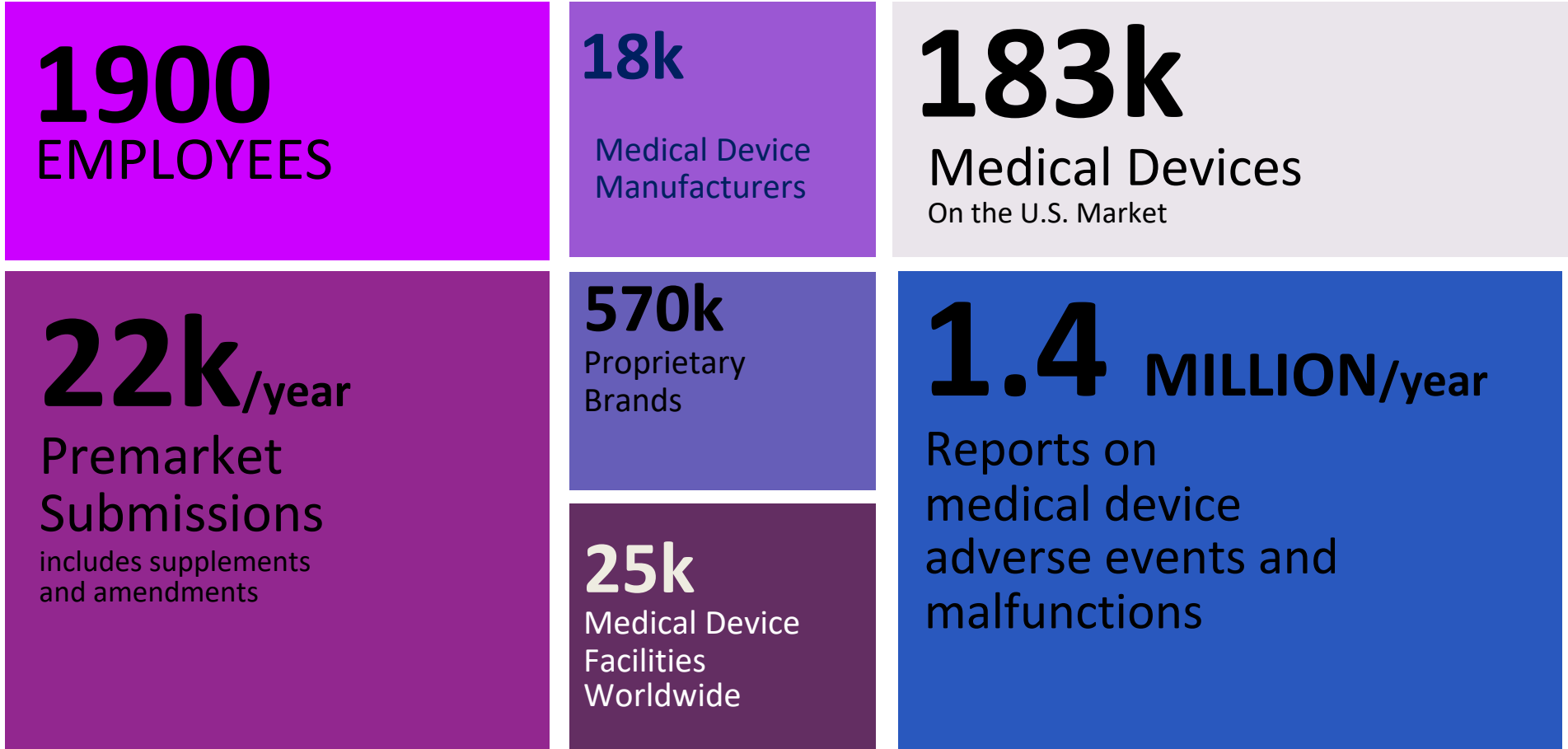


.. protect and promote the health of the public by ensuring the safety and effectiveness of **medical devices** and the safety of radiation-emitting electronic products...

We facilitate medical device innovation by advancing regulatory science, providing industry with predictable, consistent, transparent, and efficient regulatory pathways, and assuring consumer confidence in devices marketed in the U.S.



CDRH in Perspective



Office of Science and Engineering Laboratories (OSEL)

- Conduct laboratory-based regulatory research to facilitate development and innovation of safe and effective medical devices and radiation emitting products
- Provide scientific and engineering expertise, data, and analyses to support regulatory processes
- Collaborate with colleagues in academia, industry, government, and standards development organizations to develop, translate, and disseminate science and engineering-based information regarding regulated products
- <https://www.fda.gov/about-fda/cdrh-offices/office-science-and-engineering-laboratories>

OSEL in Perspective

183
FEDERAL EMPLOYEES
Up to 180 visiting scientists

140 Projects
In 27 Laboratories
and Program
Areas


400/year
Peer reviewed presentations,
articles, and other public disclosures

2,500k/year
Premarket
Regulatory consults

75
Standards and
conformity
assessment
committees

70%
Staff with post
graduate degree

55,000 ft²
Lab facilities

A detailed architectural floor plan of laboratory facilities, showing various rooms, corridors, and specialized equipment areas. The plan is color-coded with shades of blue and orange, and includes numerous alphanumeric labels for different sections and rooms.

Division of Imaging, Diagnostics and Software Reliability (DIDSR)



- Develop least burdensome approaches for regulatory evaluation of imaging and big-data devices
 - Efficient clinical trials accounting for reader variability, simulation tools, in silico phantoms and imaging trials, addressing issues related to imperfect / missing reference standards, and limited data for training/testing of machine classifiers
- Develop measures of technical effectiveness of imaging and big-data technologies
 - Phantoms, laboratory measurements, computational models

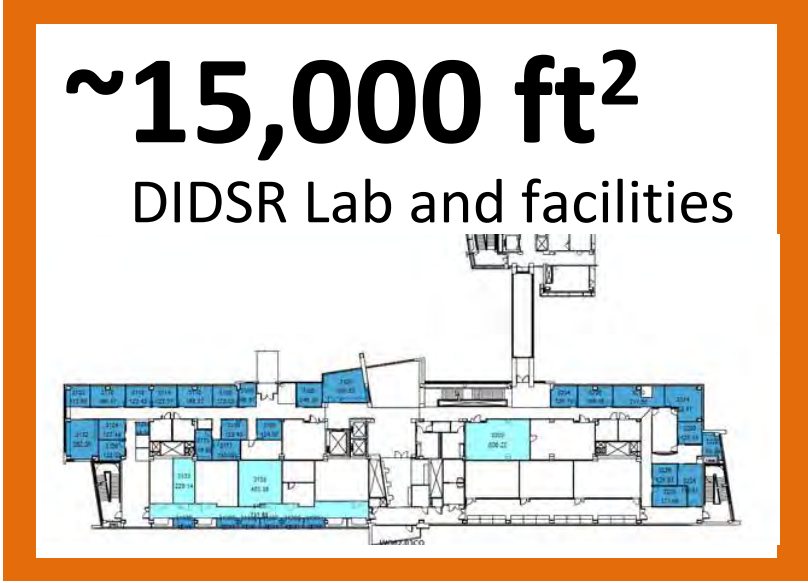
DIDSR in Perspective

35
FEDERAL EMPLOYEES
14 Fellows/Students
3 Open Staff Positions

145/year
Peer reviewed articles, code and presentations

- 4** Program Areas
- AI/ML
 - Medical Imaging and Diagnostics
 - Digital Pathology
 - Mixed Reality (AR/VR/XR)

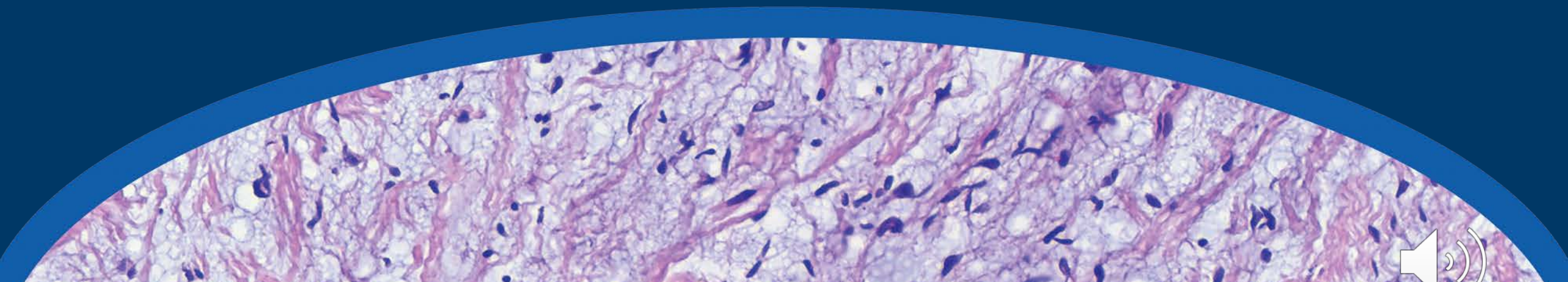
550/year
Premarket
Regulatory consults





FDA Talk 3: DIDSr AI/ML Research Program And Gaps

Alexej Gossmann
OSEL/CDRH, FDA



FDA/CDRH/OSEL Artificial Intelligence (AI) / Machine Learning (ML) Research Program, and Regulatory Science Gaps

Pathology Innovation Collaborative Community Annual Meeting (Plcc23)

June 27, 2023

Alexej Gossmann

Staff Fellow

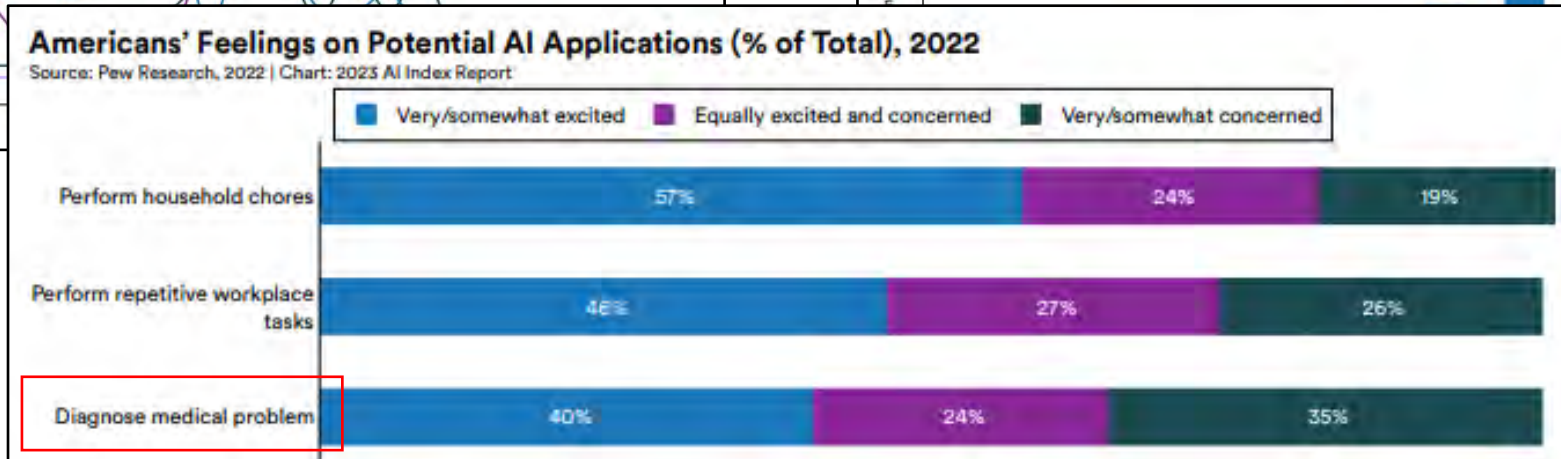
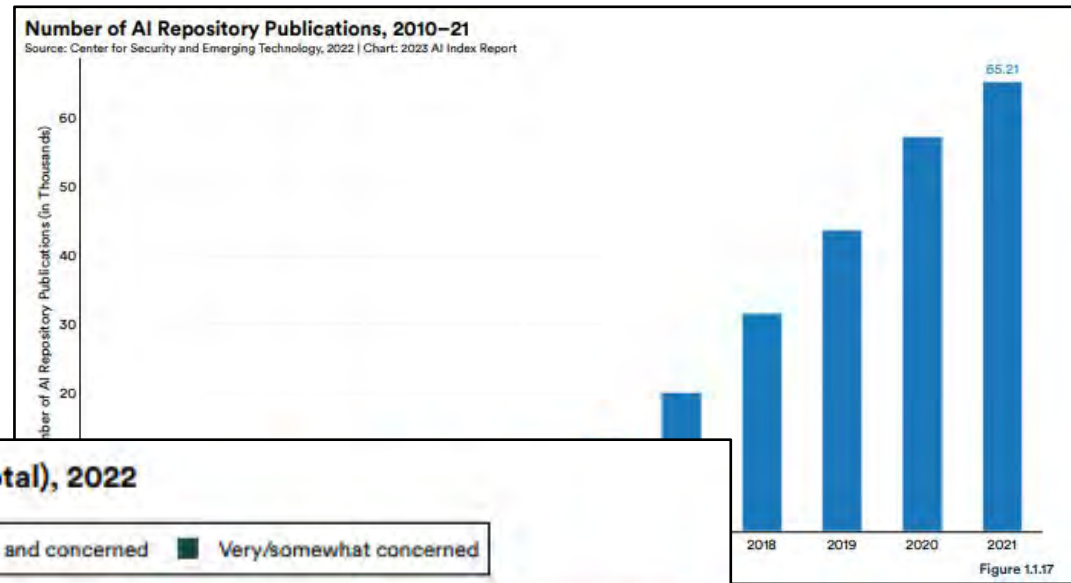
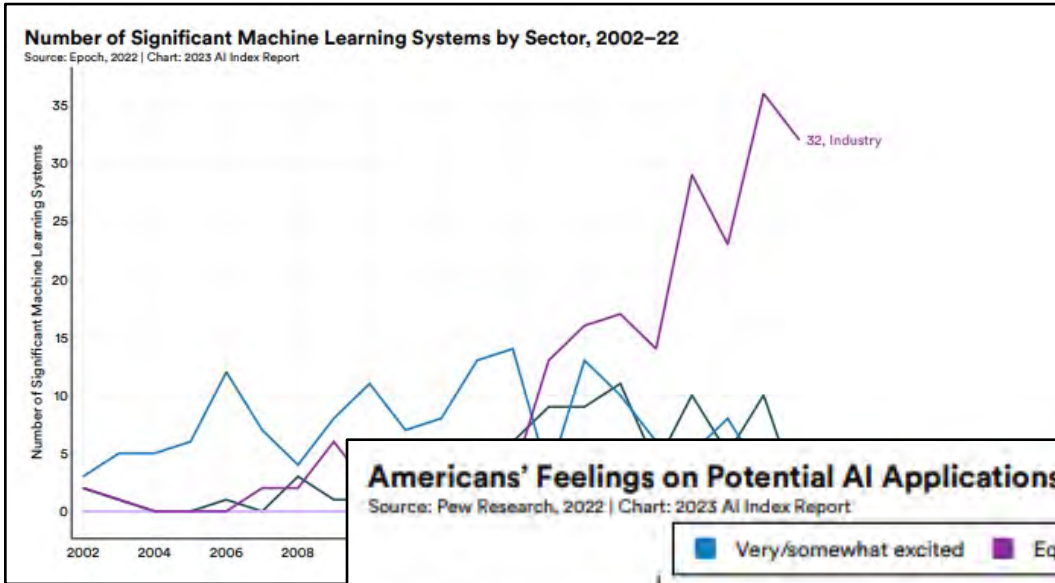
Division of Imaging, Diagnostics and Software Reliability

Office of Science and Engineering Labs

Center for Devices and Radiological Health

U.S. Food and Drug Administration

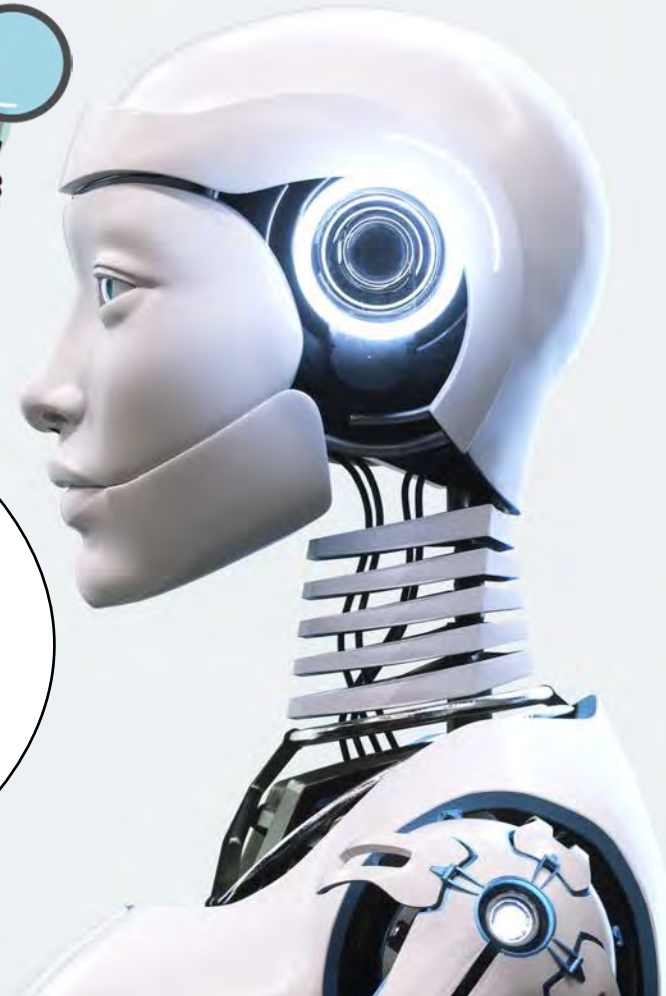
AI/ML is taking the world by storm!



Stanford HAI. 2023 AI Index Report: Measuring Trends in Artificial intelligence. Retrieved 4 April 2023.

<https://aiindex.stanford.edu/report/>

AI/ML Performance Evaluation



If you don't measure AI/ML device performance, you won't know

- How accurate, reliable, safe and effective it is,
- How to label it,
- How to improve it.

Overview of this talk

- OSEL, DIDSR: Explain who we are
- Describe regulatory science challenges and gaps in medical AI/ML
- Describe OSEL AI/ML research program activities to address these gaps



Office of Science and Engineering Labs (OSEL)



Mission Statement

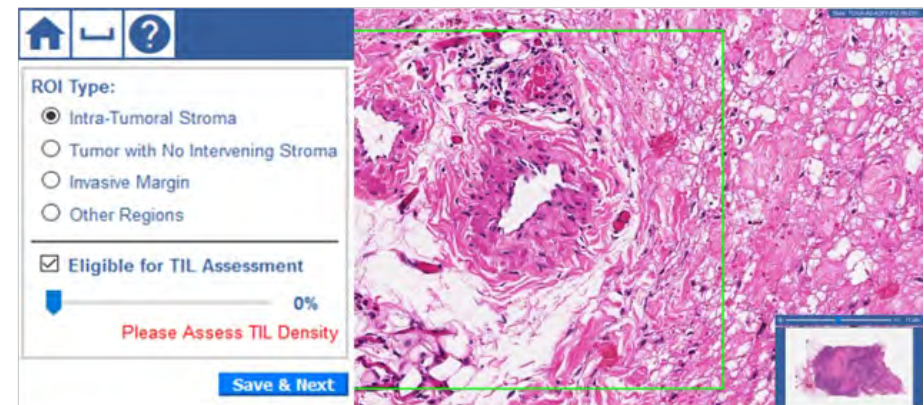
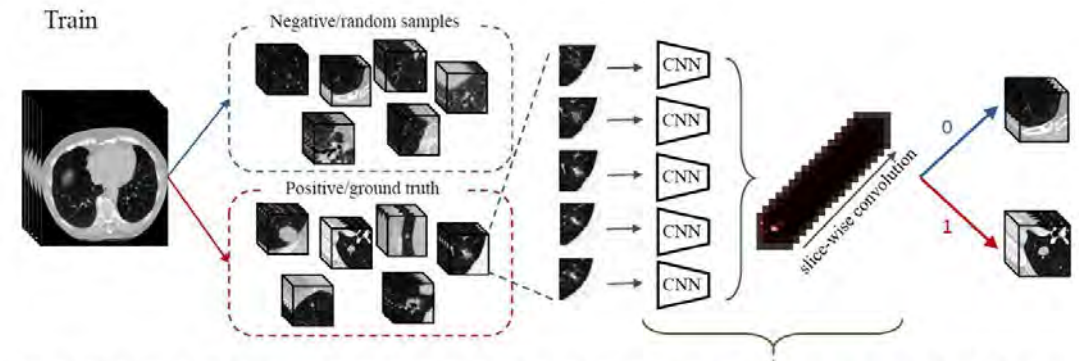
Accelerating patient access to innovative, safe and effective medical devices through best-in-the-world regulatory science.



An OSEL employee

What OSEL/DIDSR Does

- Division of Imaging, Diagnostics, and Software Reliability (DIDSR)
- Conduct regulatory science research for a variety of imaging, AI/ML, MXR, and diagnostic devices.
- Develop approaches for assessing imaging and big-data technologies.



OSEL AI/ML Program

- AI/ML program
 - Regulatory science research
 - Developing robust AI/ML test methods
 - Evaluating methodologies for assessing AI/ML
- AI/ML team identified regulatory gaps
 - Not all AI/ML knowledge gaps
 - Important ones to support FDA regulatory mission

Regulatory Science Gaps and Challenges

- Limited labeled training and test data
- Bias, equity, and generalizability
- Ground truth and metrics for performance estimation
- Evolving algorithms – How to maintain safety and effectiveness for devices with a predetermined change control plan (PCCP)
- Emerging clinical application of AI/ML
- Data Drift and Postmarket AI/ML Performance Monitoring

Regulatory Science Gaps and Challenges

- **Limited labeled training and test data**
- Bias, equity, and generalizability
- Ground truth and metrics for performance estimation
- Evolving algorithms – How to maintain safety and effectiveness for devices with a predetermined change control plan (PCCP)
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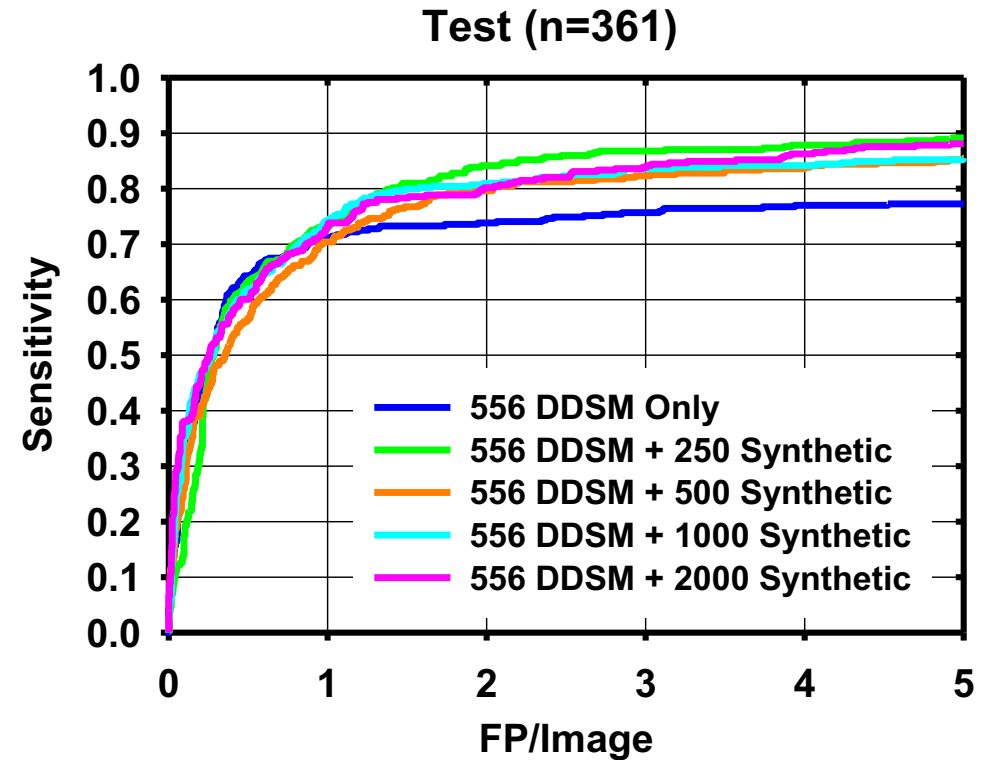
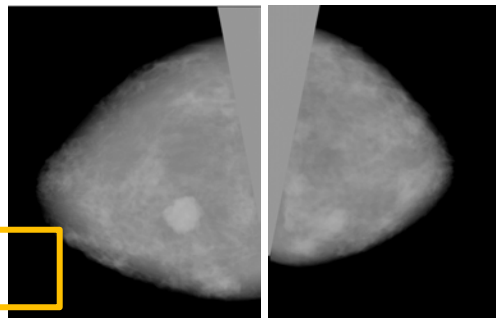
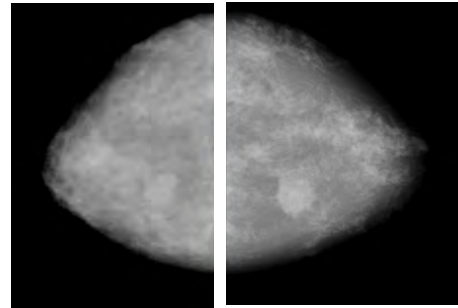
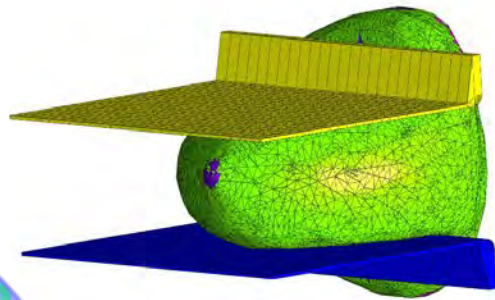
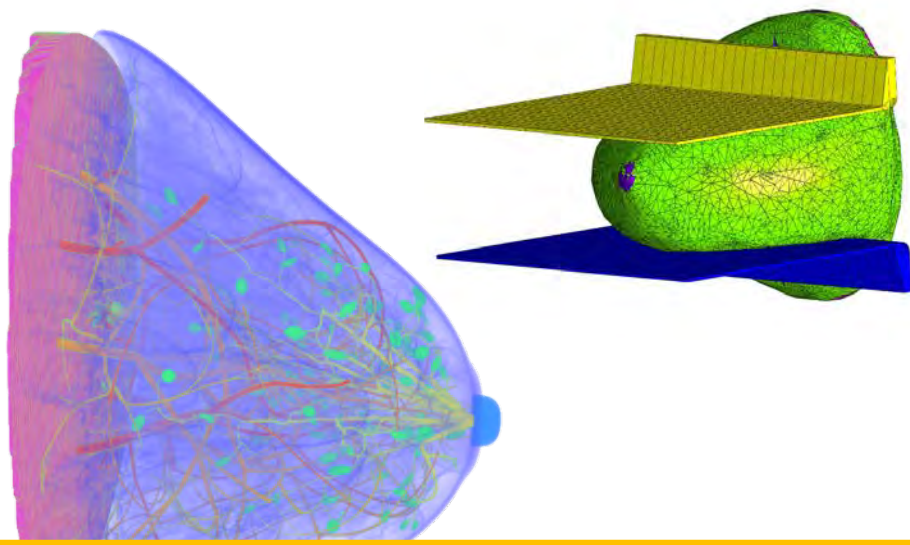
Limited labeled training and test data



- There is a need for
 - Fundamental understanding of the limitations of smaller datasets and
 - Novel techniques to enhance AI/ML algorithm training and testing when the real-world datasets are limited in size

Use of synthetic data for AI training and testing

- AI algorithms require large training data sets for high performance
- Limited annotated data sets for medical images
- In-silico images may help



Badano et al., JAMA Network Open 2018

RST: [VICTRE: In Silico Breast Imaging Pipeline](#) | FDA

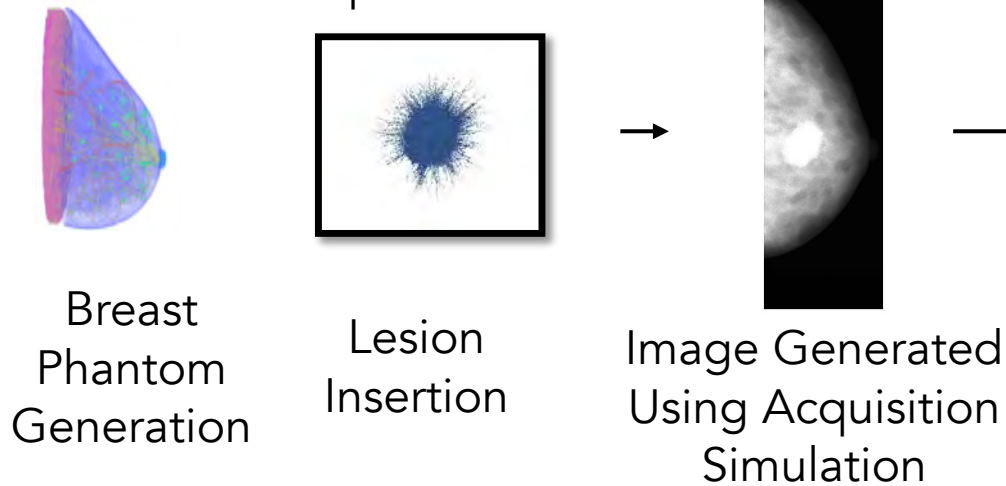
Cha et al., "Evaluation of data augmentation via synthetic images for improved breast mass detection on mammograms using deep learning," Journal of Medical Imaging 2020

REALYSM: Simulations-based testing for AI devices

Goal: Generate realistic simulated data where real patient examples are unavailable

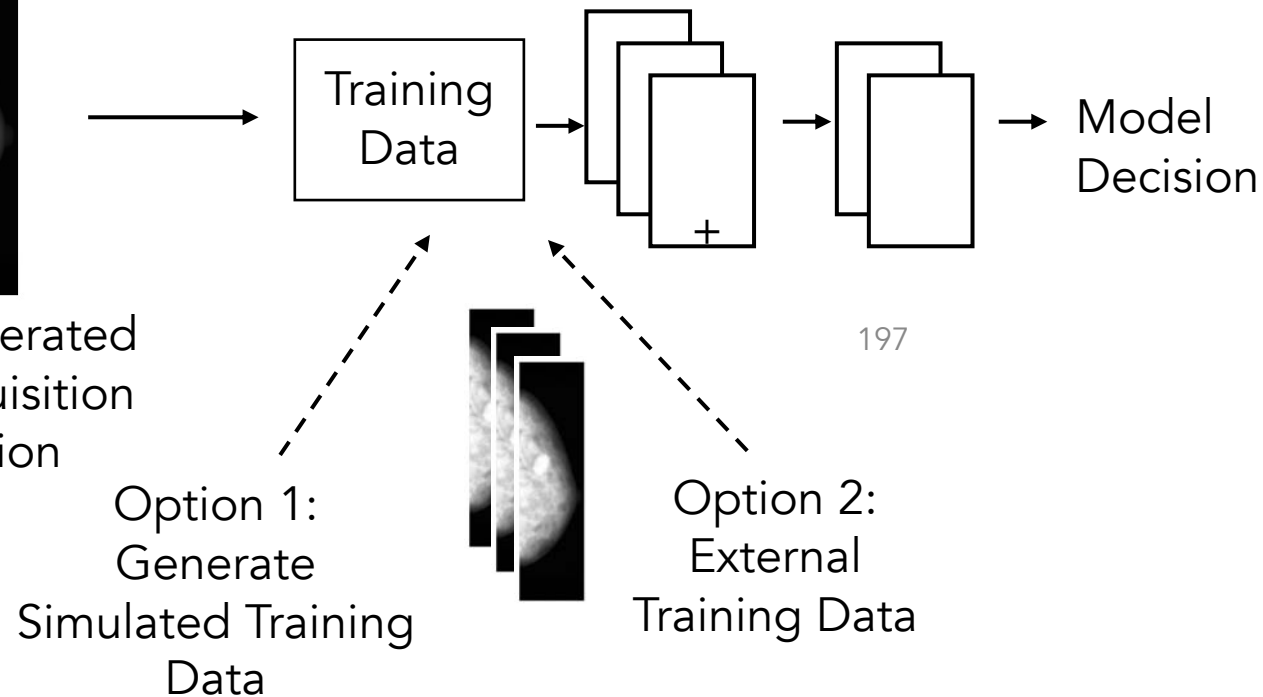
Badano et al. The stochastic digital human ... ArXiv preprint 2023.

(a) Data Simulation: Sample simulation parameters

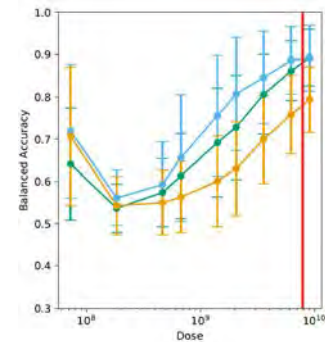


Sizikova et al. Fully-Detailed, Physics-based In Silico Approach for Evaluating ... 2023 (in review)

(b) AI Model



(c) AI Evaluation



Regulatory Science Gaps and Challenges

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- **Bias, equity, and generalizability**
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Bias, equity, and generalizability

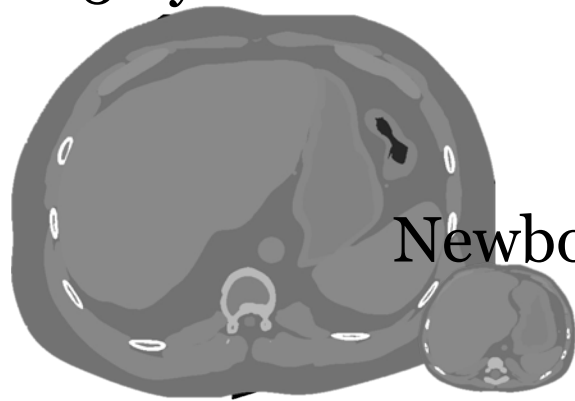
- There is a need for methods to understand, analyze and minimize performance differences of AI/ML-enabled devices among subgroups

Pediatric-Specific Evaluations for Deep Learning CT Image Reconstruction and Denoising



- Deep learning image reconstruction (DLIR) models primarily trained on adults.
- Do pediatric patients benefit equally from adult-trained DLIR models?
- **PEDIatric CT Evaluation ToolKit (PED-ETK)**

58 yr male



Newborn

Low Accuracy +
Contrast Sharpness

Adult

5 yrs

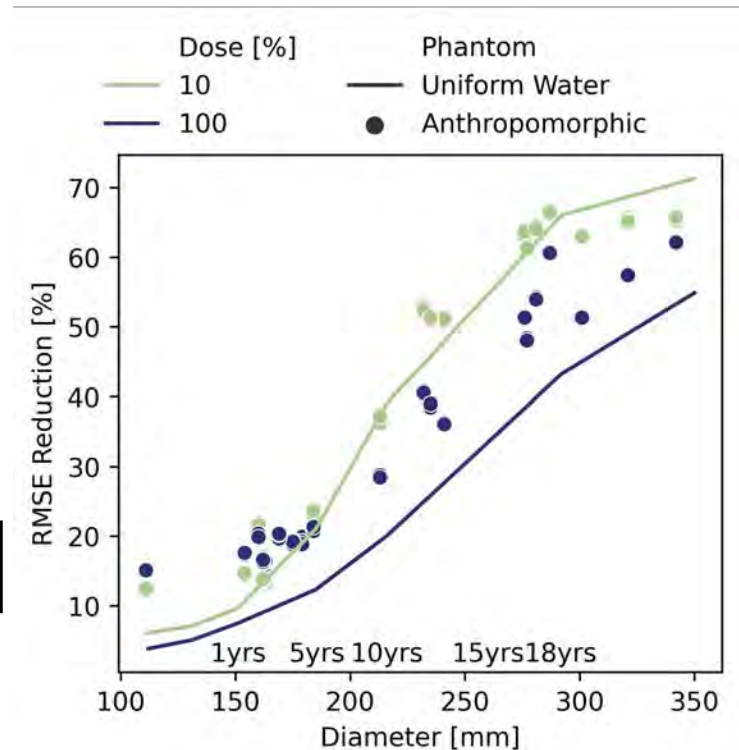
1 yrs

Diameter
in mm

292

185

151



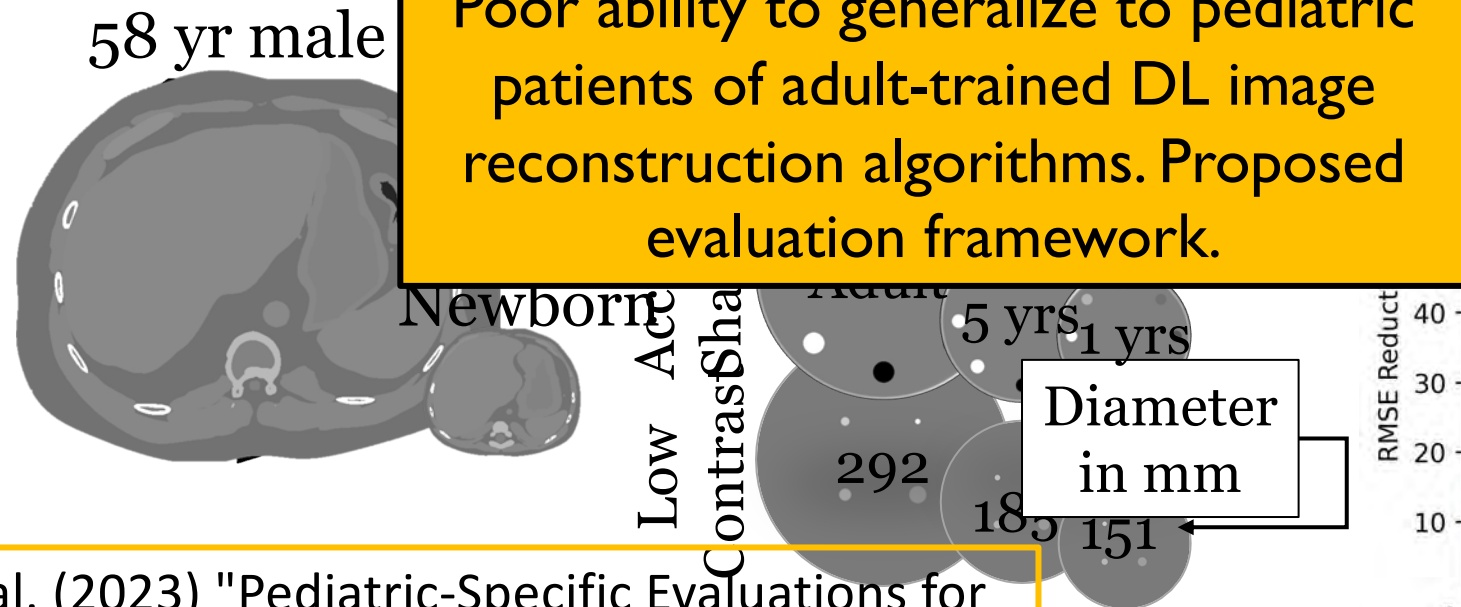
Nelson et al. (2023) "Pediatric-Specific Evaluations for Deep Learning CT Image Reconstruction and Denoising Techniques" - under review

<https://github.com/DIDSR/PED-ETK>

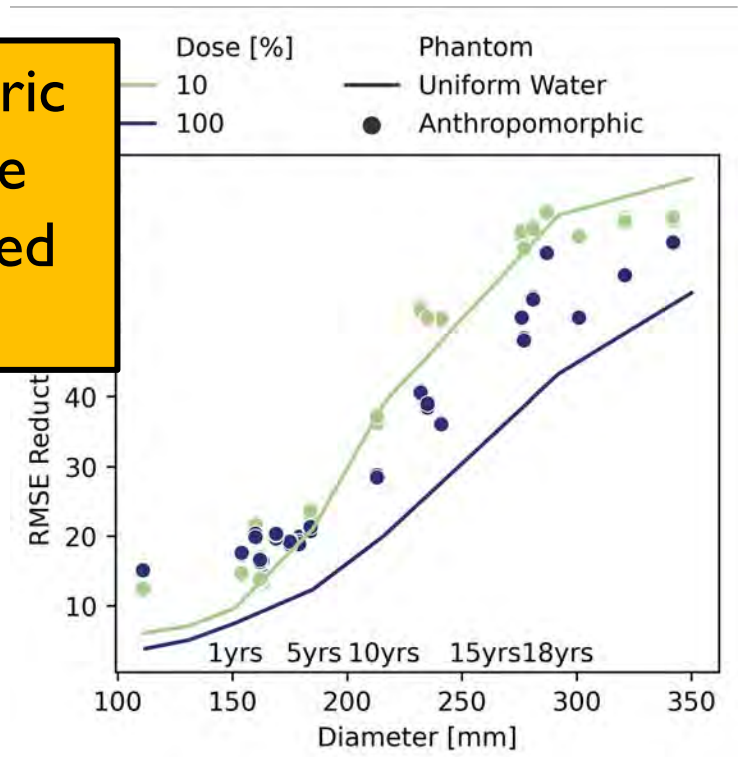
Pediatric-Specific Evaluations for Deep Learning CT Image Reconstruction and Denoising



- Deep learning image reconstruction (DLIR) models primarily trained on adults.
- Do pediatric patients benefit equally from adult-trained DLIR models?
- **PEDIatric CT Evaluation Toolkit (PED-ETK)**



Poor ability to generalize to pediatric patients of adult-trained DL image reconstruction algorithms. Proposed evaluation framework.



Nelson et al. (2023) "Pediatric-Specific Evaluations for Deep Learning CT Image Reconstruction and Denoising Techniques" - under review

<https://github.com/DIDSR/PED-ETK>

Regulatory Science Gaps and Challenges

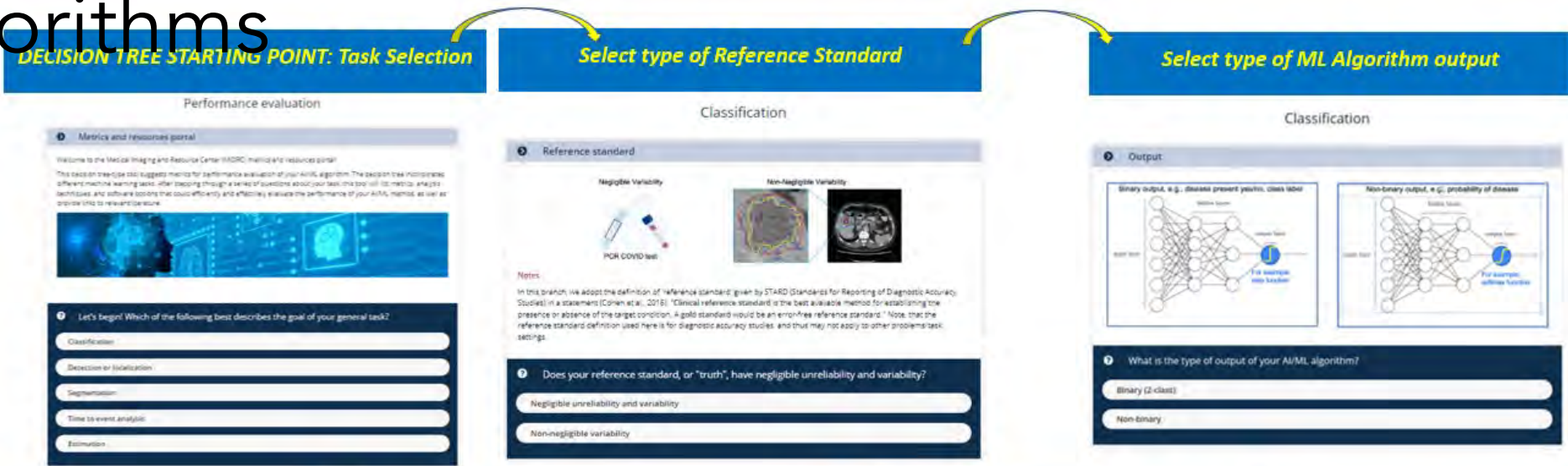
- Limited labeled training and test data
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- **Ground truth and metrics for performance estimation**
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Ground truth and metrics for performance estimation



- A need to understand how to determine the level of truth needed to evaluate AI-enabled devices in a least burdensome fashion
- The metrics used to determine AI/ML performance
- Determination of acceptable performance criteria

MIDRC: Task-specific Performance Evaluation Metric Selection Tools for Machine Learning Algorithms



SUGGESTED EVALUATION METHODS **DETAILS ON EACH EVALUATION METHOD** **DETAILS ON SPECIFIC METRICS** **REFERENCES, RESOURCES and LINKS TO KNOWN EVALUATION SOFTWARE PACKAGES**

Classification

Evaluation methods

Suggestions for evaluation of 2-class classification based on a reference standard with negligible variability and binary AI/ML output

These are commonly used evaluation methods:

- Receiver Operating Characteristic (ROC) Analysis
- Precision-Recall analysis

Classification

Receiver operating characteristic (ROC) curve analysis

For a classifier with a scalar output, one can obtain different (sensitivity, specificity) pairs by applying a decision threshold to the classifier output. The ROC curve shows the relationship between sensitivity (the true positive fraction) and 1-specificity (the false positive fraction) for every possible decision threshold.

MIDRC
MEDICAL IMAGING AND DATA RESOURCE CENTER
MIDRC TDP3c/d
Receiver operating characteristic curve (ROC) analysis tutorial

Area under the ROC curve and analysis of the entire curve

The area under the ROC curve, often abbreviated as AUROC, or AUC, is a commonly used metric to measure the model's ability to separate positive and negative cases (204)

Resources and notes for computing AUROC and its confidence intervals

- The R package "pROC" provides tools to visualize the ROC curve, estimate AUROC using both non-parametric and parametric approaches, and estimate confidence intervals. It also provides bootstrap methods to compare the area under curve for multiple ROC curves.
- The **IMBAC** package, in addition to providing estimates to AUROC and its confidence intervals, helps analyze the data when there are multiple models (computer classifiers or human readers) that provide scores for the cases (multi-reader multi-case).

Drukker et al., "The Medical Imaging and Data Resource Center (MIDRC) Technology Development Project (TDP) 3c: Developing Tools to Assist in Task-specific Performance Evaluation for Machine Learning Algorithms Employing MIDRC Data," AAPM 2022

<https://www.midrc.org/performance-metrics-decision-tree>

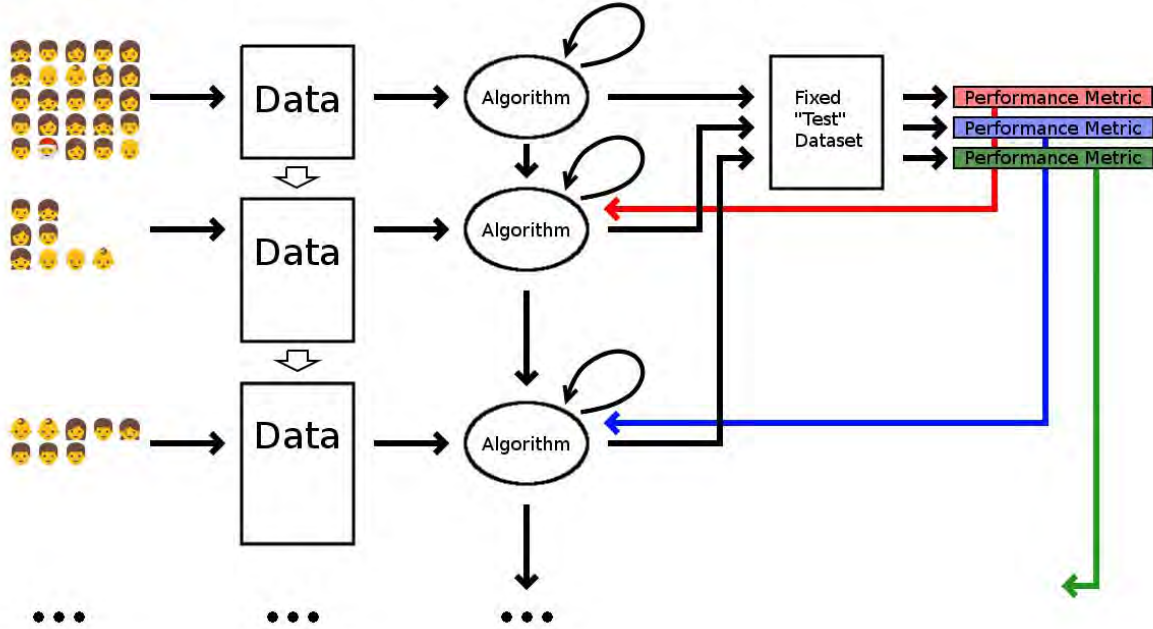
Regulatory Science Gaps and Challenges

- Limited labeled training and test data
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- Ground truth and metrics for performance estimation
- **Evolving algorithms – How to maintain safety and effectiveness for devices with a predetermined change control plan (PCCP)**
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Evolving algorithms

- How to maintain safety and effectiveness for devices with a predetermined change control plan (PCCP)
- Our stakeholders would like a more flexible pre-market regulatory process to allow for periodic modifications of AI/ML algorithms over time and evolving AI algorithms without the need for a new regulatory submission.
- There are many open questions related to the regulation of such devices.

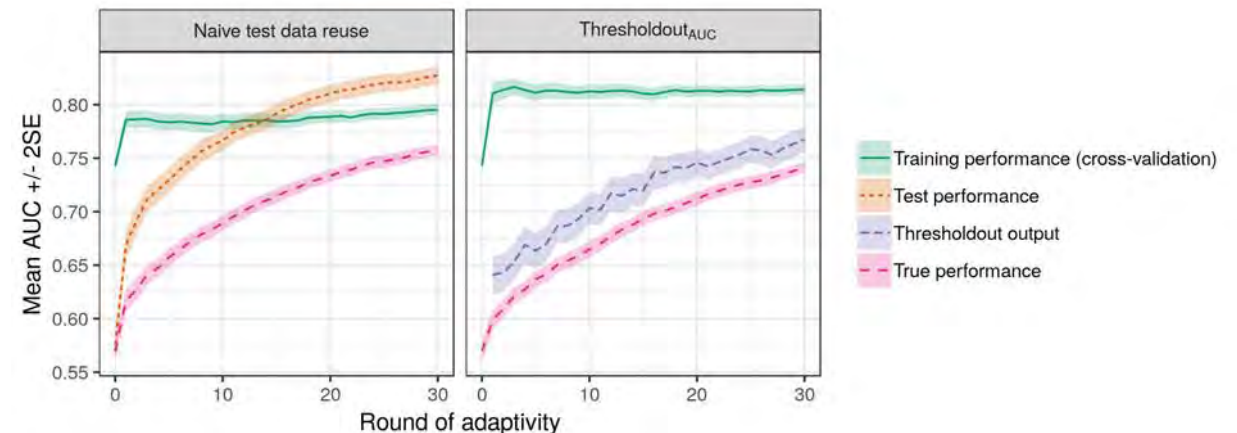
How can we reuse an existing test dataset to validate sequential algorithmic modifications?



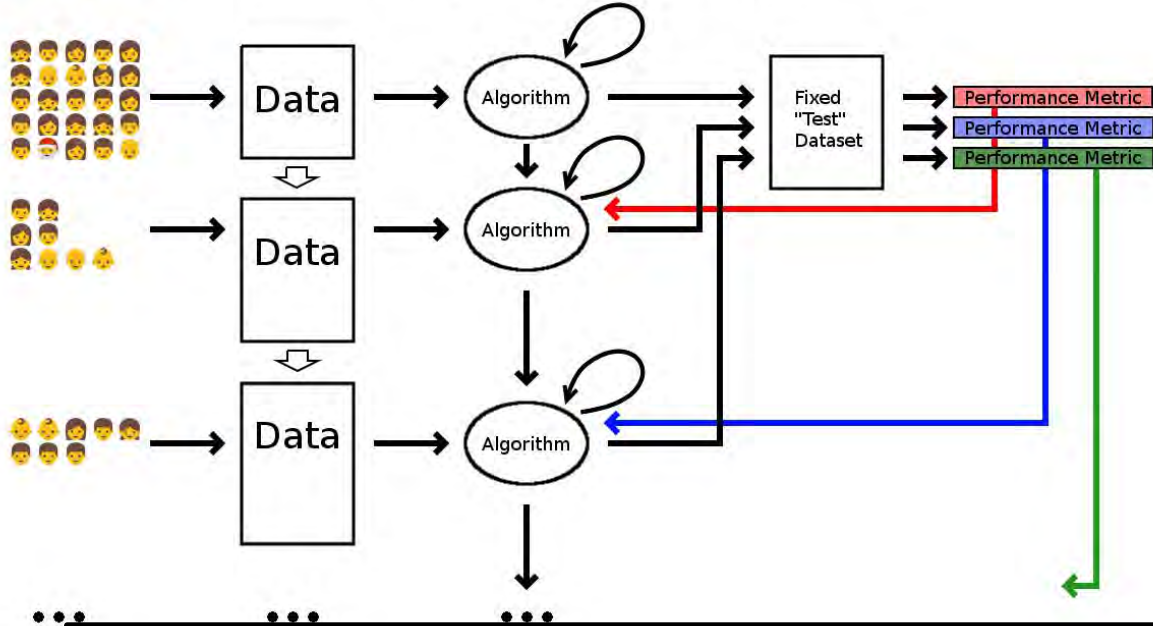
Methods that allow for valid test data reuse restrict the amount of information leaked with each query by

- (a) perturbing the query result with random noise \rightarrow differential privacy
- (b) restricting the number of bits of information returned.

Gossmann et al., "Test Data Reuse for the Evaluation ...," SIAM J Math Data Science, 2021



How can we reuse an existing test dataset to validate sequential algorithmic modifications?

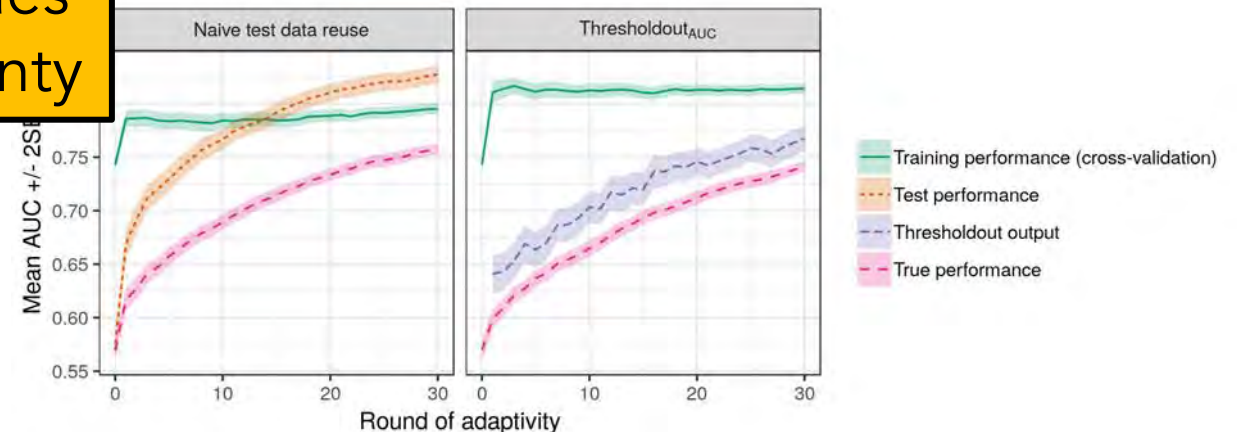


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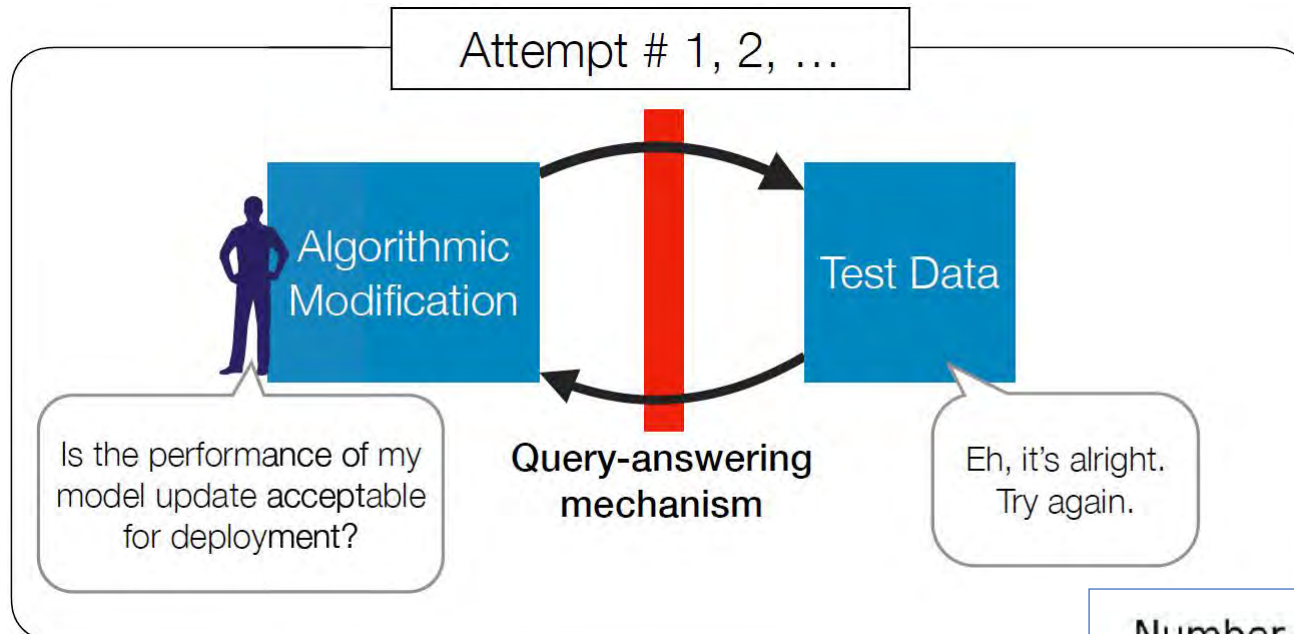
- (a) perturbing the query result with random noise \rightarrow differential privacy
- (b) restricting the number of bits of information returned.

Accuracy of reported performance values improves at the cost of higher uncertainty

Gossmann et al., "Test Data Reuse for the Evaluation ...," SIAM J Math Data Science, 2021



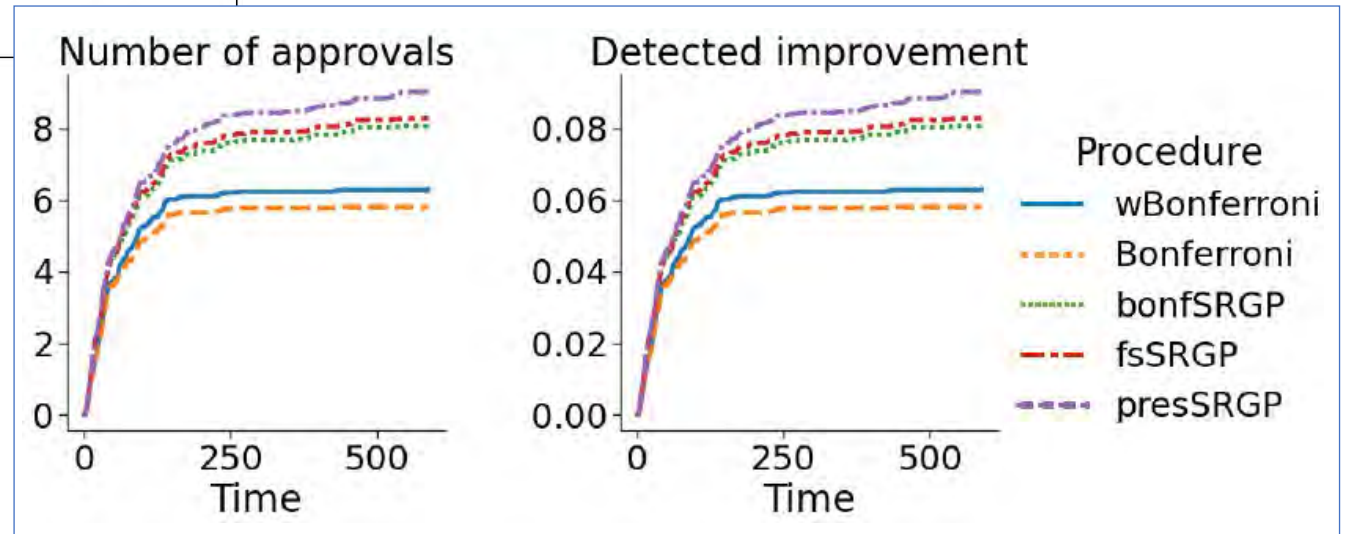
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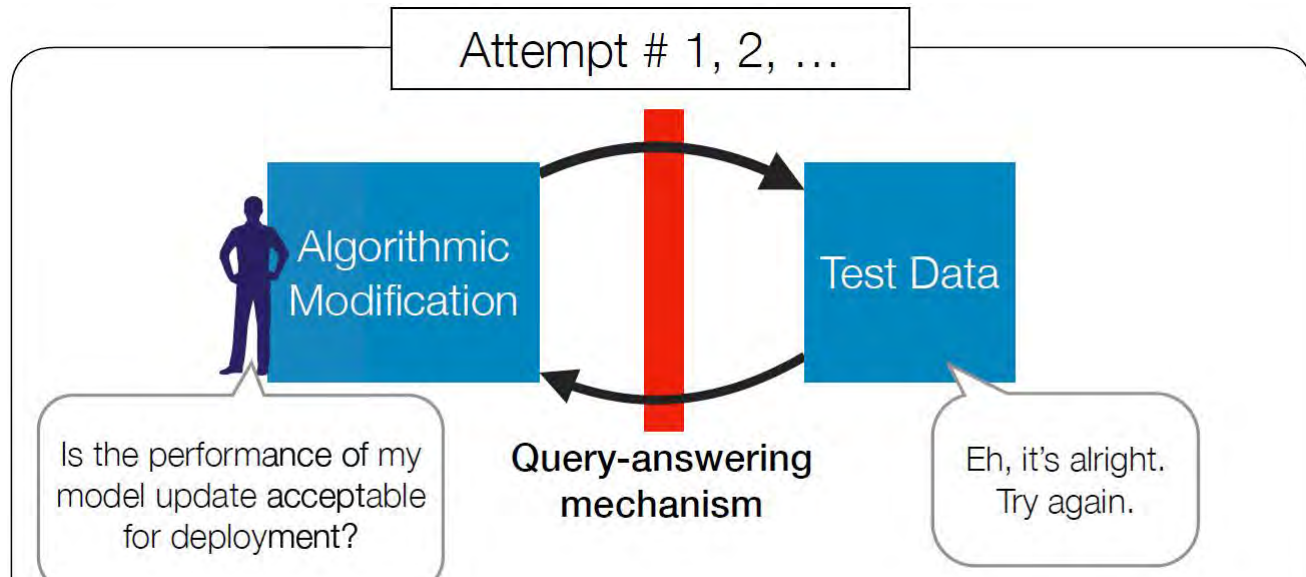
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Feng et al., "Sequential algorithmic modification with test data reuse," UAI, 2022



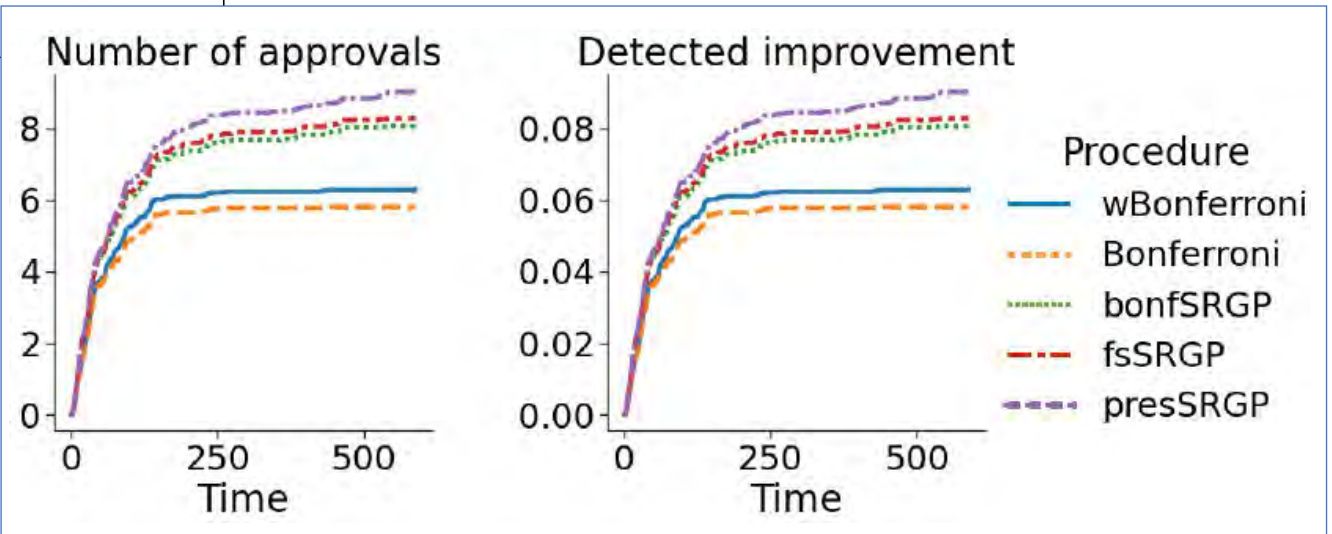
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Methods that allow for valid test data reuse restrict the amount of information leaked with each query by

- (a) perturbing the query result with random noise → differential privacy
- (b) restricting the number of bits of information returned.

Proposed method approves the most model updates and achieves the best performance, while controlling the rate of bad approvals.



algorithmic modification with test data reuse," UAI, 2022

Regulatory Science Gaps and Challenges

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Emerging clinical application of AI/ML

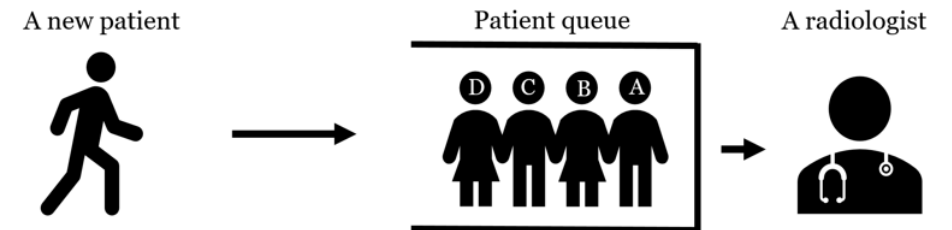
- Device sponsors continue to think of new ways to utilize AI/ML in medical practice, including
 - Automating patient referrals,
 - Triageing patients,
 - Reading images autonomously,
 - Large language models (LLMs) applied to medical records,
 - Etc.
- We need methods for evaluating these new and different uses of AI.

A Modeling Tool for Streamlined Assessment of Emerging Radiological Computer-Assisted Triage (CADt) and Notification Software

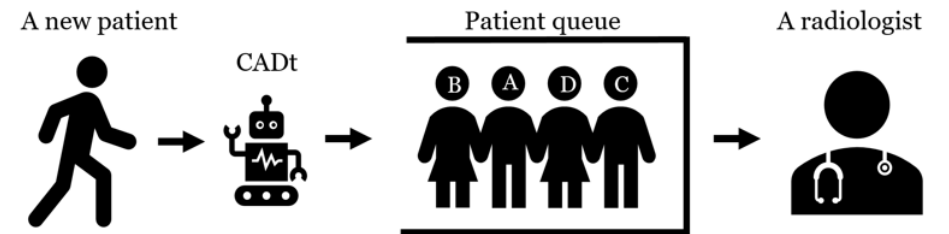


- 30+ FDA-approved CADt devices since 2018
- Why CADt devices?
 - Faster diagnosis and treatment for time sensitive diseases e.g. stroke
- How effective is a CADt device?
 - Use queueing theory to quantify the amount of time savings

Without CADt device – First in first out (FIFO)



With CADt device – Preemptive-resume priority (PRIO)



Thompson et al., "Wait-Time-Saving Analysis and ...," SPIE MI, 2022

A Modeling Tool for Streamlined Assessment of Emerging Radiological Computer-Assisted Triage (CADt) and Notification Software



- Input factors
- Device performance (Se, Sp)
 - Disease prevalence
 - Patient arrival rate
 - Radiologist reading rate
 - Hospital busyness
 - Number of radiologists

Queueing Theory
(based on Markov Chain)

Without CADt

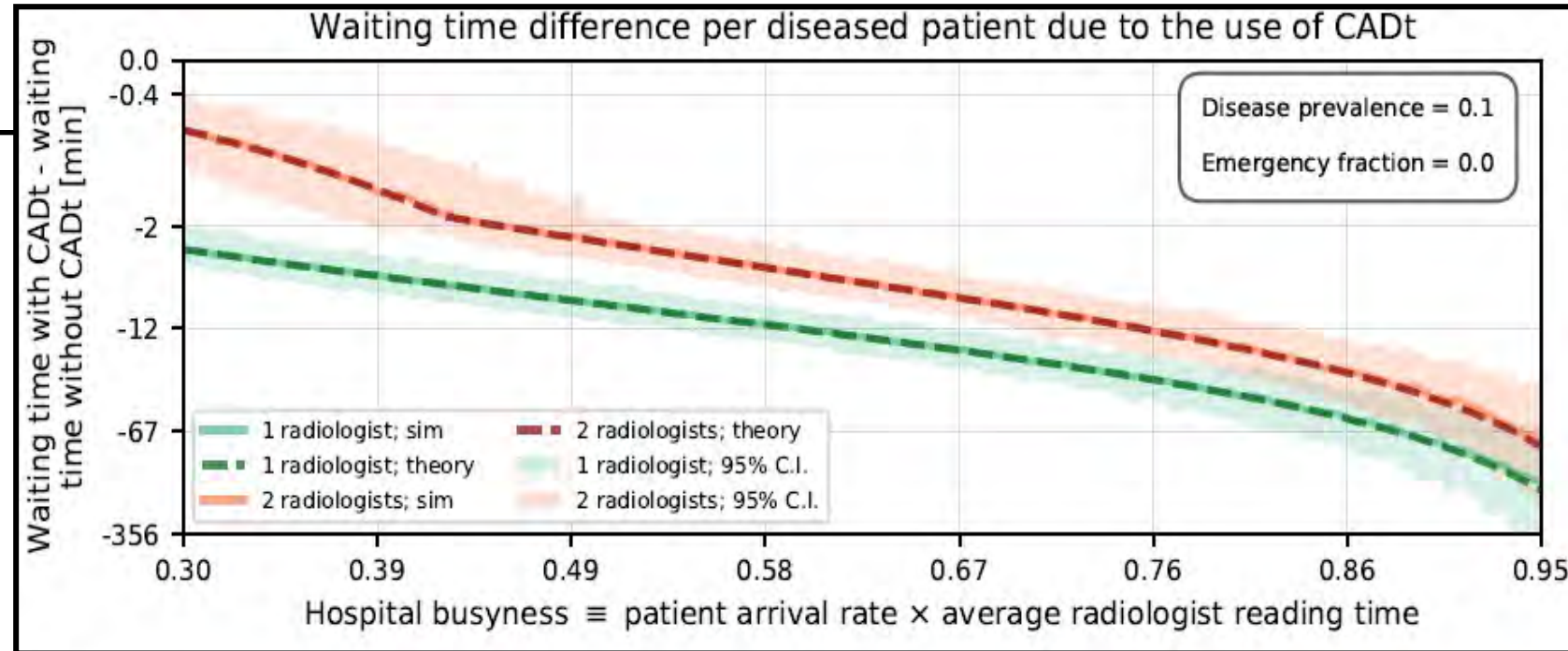


$W_{FIFO} \equiv$ Mean waiting time per patient

With CADt



$W_{+PRIO} \equiv$ Mean waiting time per AI positive patient
 $W_{-PRIO} \equiv$ Mean waiting time per AI negative patient



Thompson et al., "Wait-Time-Saving Analysis and ...," SPIE MI, 2022

A Modeling Tool for Streamlined Assessment of Emerging Radiological Computer-Assisted Triage (CADt) and Notification Software



- Input factors
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Queueing Theory
(based on Markov Chain)

Without CADt



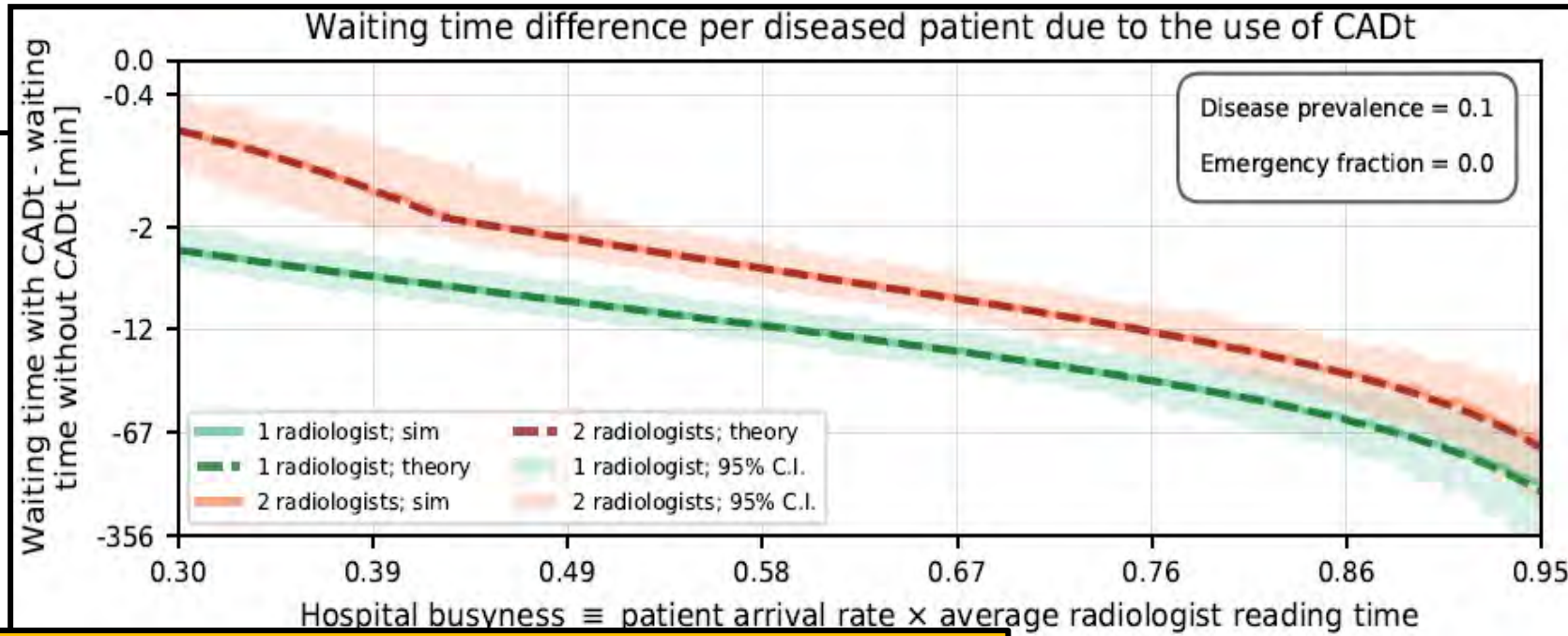
$W_{FIFO} \equiv$ Mean waiting time per patient

With CADt



CADt most effective in a busy, short-staffed clinic

$W_{PRIO} \equiv$ Mean waiting time per AI positive patient
 $W_{-PRIO} \equiv$ Mean waiting time per AI negative patient



Thompson et al., "Wait-Time-Saving Analysis and ...," SPIE MI, 2022

Regulatory Science Gaps and Challenges

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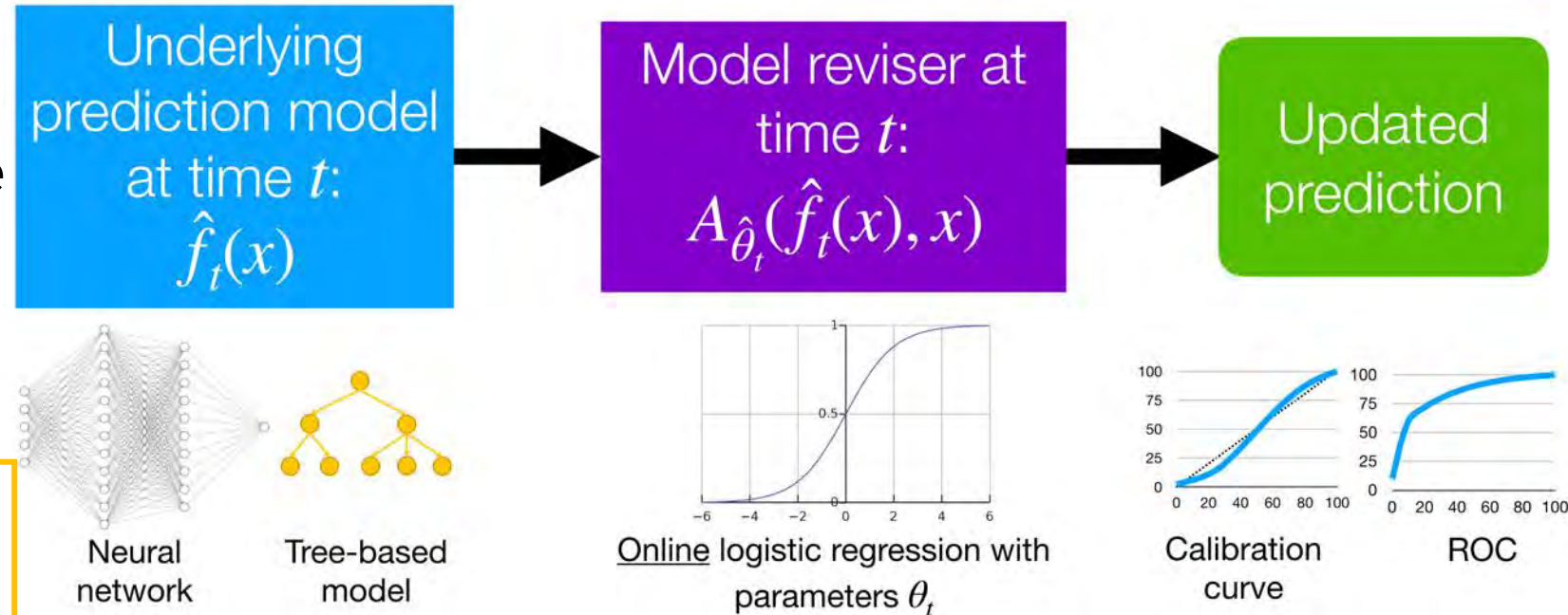
Data Drift and Postmarket AI/ML Performance Monitoring



- Data acquisition systems and protocols, and patient populations change over time and by site.
- AI/ML device users, such as radiologists, and patients want to know that the AI products they are using will be accurate and reliable even as practice and patient populations change.
- We need planned and standardized methods for detecting changes to the inputs of AI devices, monitoring the accuracy of their outputs, and mitigating effects of those drifts.

Online Recalibration

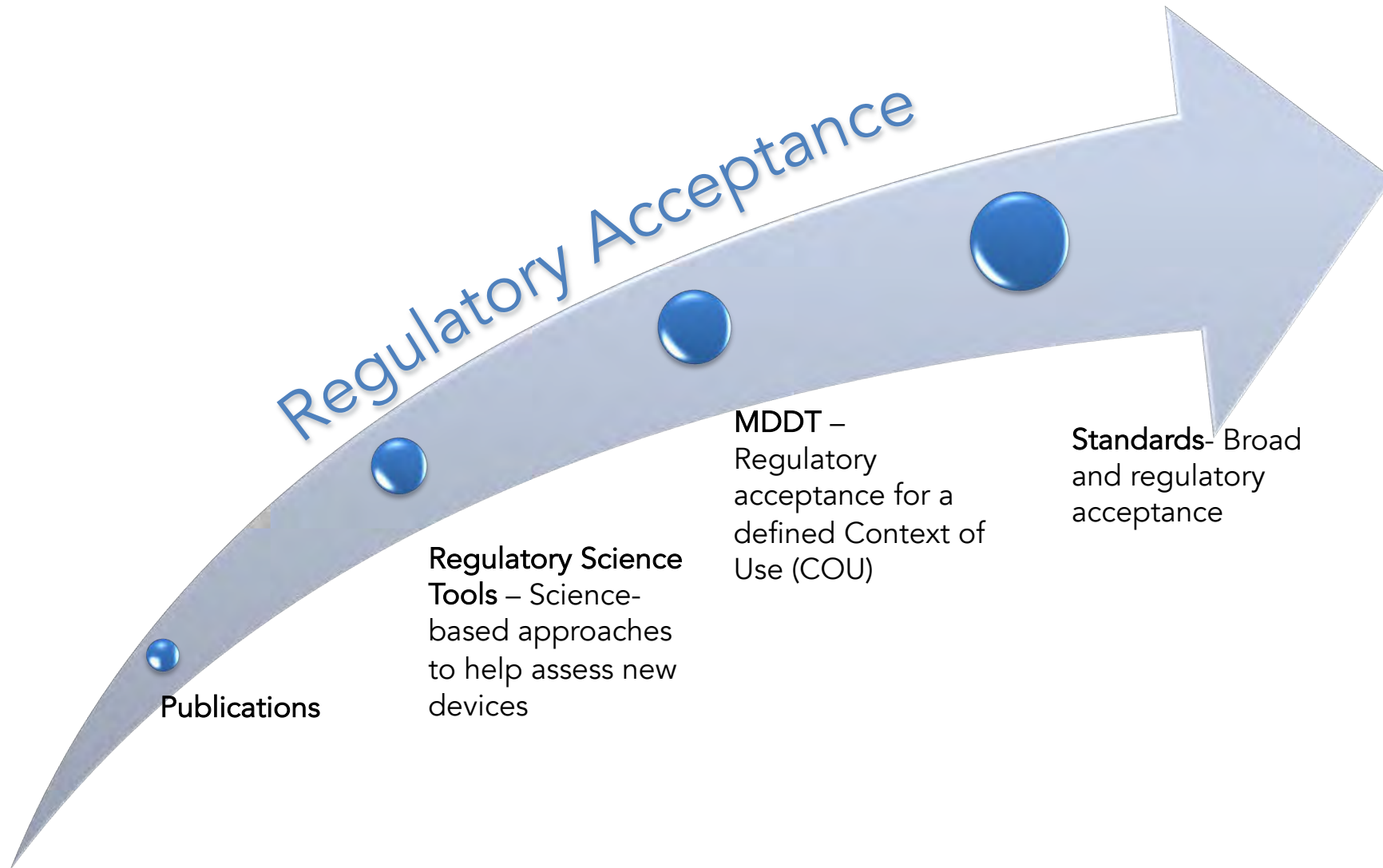
- Model updates can protect against changes in the environment, and learn from accumulating data.
- However, algorithmic modifications also carry the risk of deteriorating model performance.
- We design an online logistic recalibration and revision procedure that provides performance guarantees.



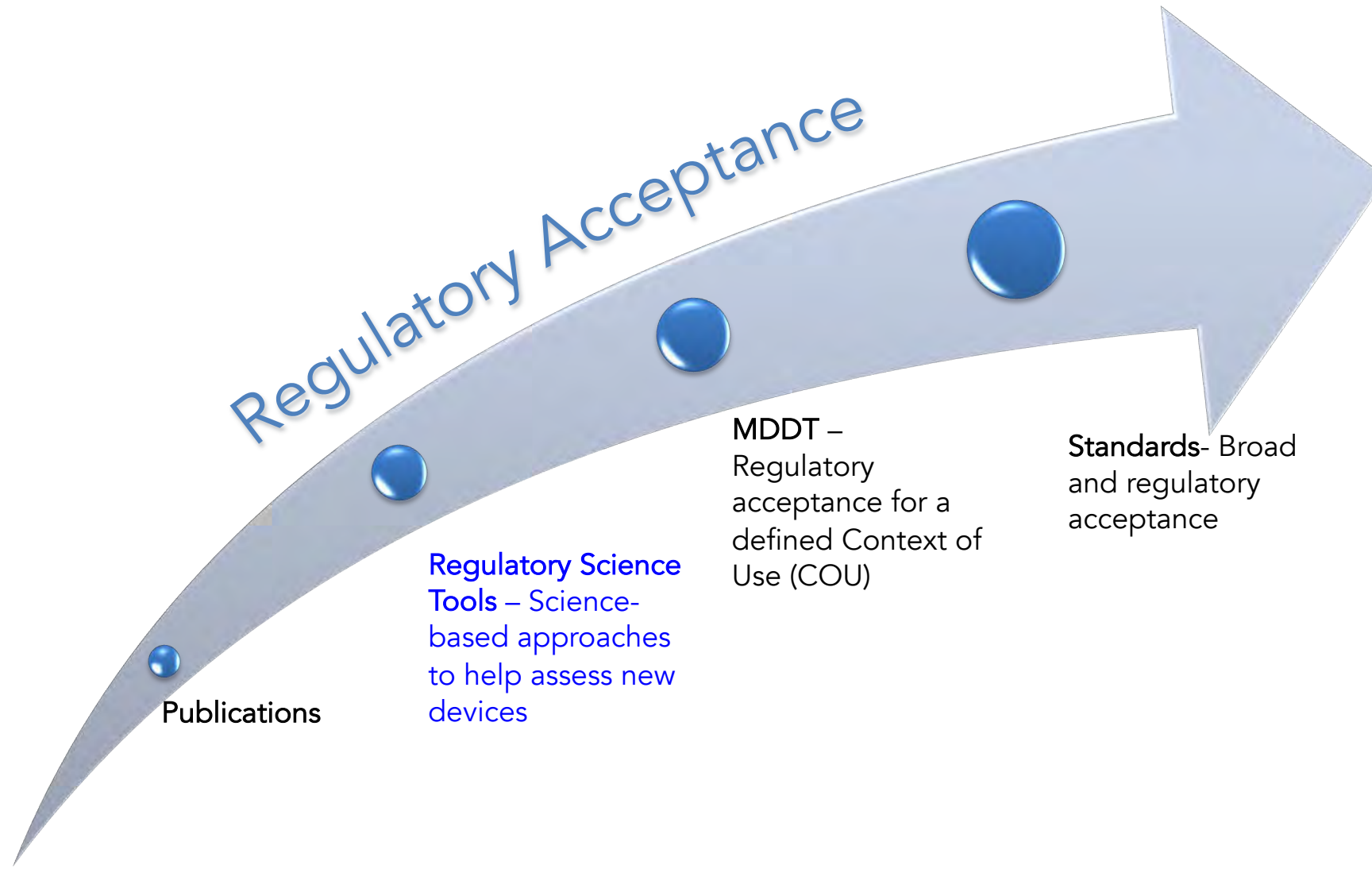
Feng et al., "Bayesian logistic regression for online recalibration and revision ...," JAMIA 2022.

Putting tools in the hands of stakeholders

Regulatory Science Tools (RST)



Regulatory Science Tools (RST)



AI/ML Relevant RSTs

iMRMC: Multi-Reader Multi-Case Reader Studies	Statistical tools (java GUI and R package) to analyze, size, and simulate multi-reader multi-case (MRMC) reader studies	Model	Imaging reader studies, Artificial intelligence/machine learning	GitHub
iRoeMetz Application	A java application used to simulate reader scores for multi-reader multi-case (MRMC) reader studies	Model	Imaging reader studies, Artificial intelligence/machine learning	GitHub

Catalog of Regulatory Science Tools to Help Assess New Medical Devices

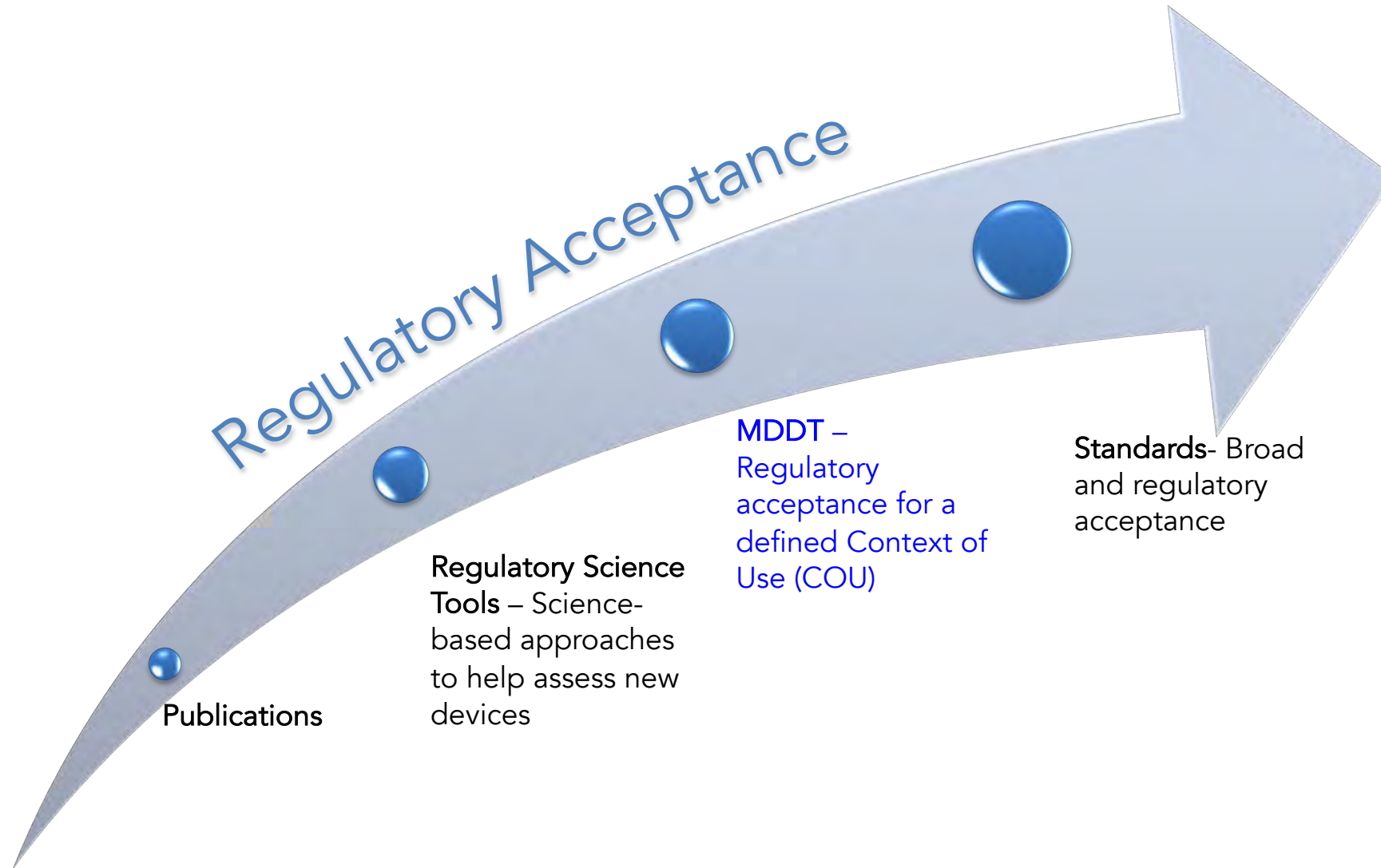
[f Share](#)
[t Tweet](#)
[e Email](#)



<https://www.fda.gov/medical-devices/science-and-research-medical-devices/catalog-regulatory-science-tools-help-assess-new-medical-devices>

VICTRE: Breast Mass Generation Software	A modeling software that randomly generates main body of breast masses including random branching spicules grown out from the mass surface	Model	Medical imaging and diagnostics	GitHub
VICTRE: Digital Mammography Regions of Interest (ROIs)	VICTRE ROI patches for digital mammography of breast density categories with microcalcification cluster and spiculated mass inserted signals.	Dataset	Medical imaging and diagnostics	GitHub
VICTRE: Model Observers (MO)	Computer model observer functions to perform location-known lesion detection tasks	Model 222	Medical imaging and diagnostics	GitHub
VICTRE: Virtual Imaging Clinical Trials for Regulatory Evaluation	An entirely in-silico imaging clinical trial replicating a premarket study.	Model	Medical imaging and diagnostics	GitHub Article
VICTRE: Multi-modality Anthropomorphic Breast Phantom	A digital breast phantom with modifiable parameters including phantom voxel size (resolution) and breast density	Phantom, Virtual	Medical imaging and diagnostics	GitHub Document
VICTRE_MCGPU: Pivotal Study Simulations	A simulation tool that replicates a Siemens Mammomat Inspiration system for VICTRE	Model	Medical imaging and diagnostics	GitHub

Regulatory Science Tools (RST)





Medical Device Development Tools (MDDTs)

Qualification of Medical Device Development Tools

Guidance for Industry, Tool Developers, and Food and Drug Administration Staff

Document issued on: August 10, 2017

The draft of this guidance document was issued on November 14, 2013.

For questions regarding this document, contact MDDT@fda.hhs.gov.

<https://www.fda.gov/media/87134/download>

Summary



- Active research from OSEL has been
 - Identifying and addressing critical gaps in device evaluation of medical AI/ML
 - Putting methodology and tools into the hands of stakeholders

Acknowledgments

- I'd like to acknowledge Berkman Sahiner, Nicholas Petrick, Brandon Nelson, Elena Sizikova, Kenny Cha, and Elim Thompson for providing slides and information used this presentation.

Questions



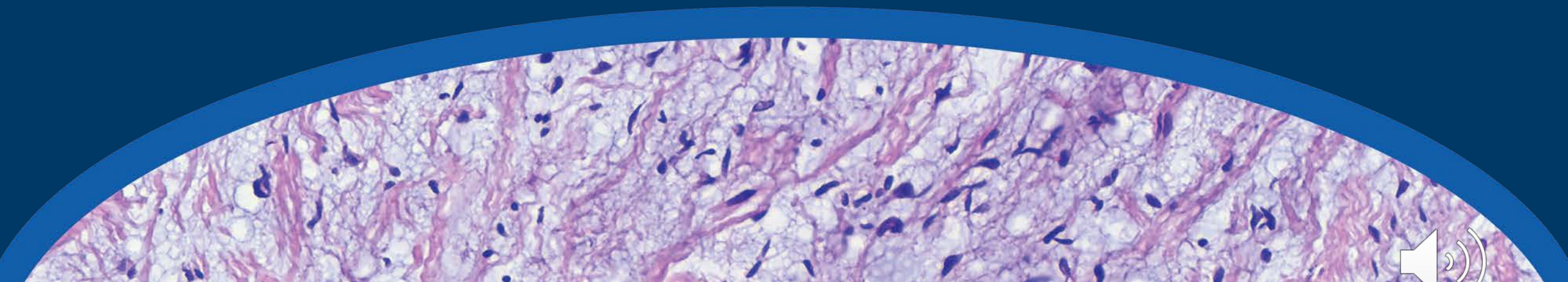


U.S. FOOD & DRUG
ADMINISTRATION



FDA Talk 4: Predetermined Change Control Plan

Ayobami Adebowale
DHC_oE, CDRH, FDA





CDRH's Digital Health Center of Excellence

Empowering digital health stakeholders to advance public health



PREDETERMINED CHANGE CONTROL PLANS

Ayobami Adebowale, M.Eng

Biomedical Engineer for Digital Health Policy, CDRH Digital Health Center of Excellence
Office of Science and Technology (OST), Center for Devices & Radiological Health (CDRH), US
FDA

Patients are at the Heart of What We Do



CDRH Vision

Patients in the U.S. have access to high-quality, safe, and effective medical devices of public health importance first in the world

Advancing Health Equity for All Devices is a Top Strategic Priority for CDRH

Historically, under-resourced populations lack access to quality health care.



DHTs in Clinical Trials



Transparency and Trust



Artificial Intelligence/
Machine Learning



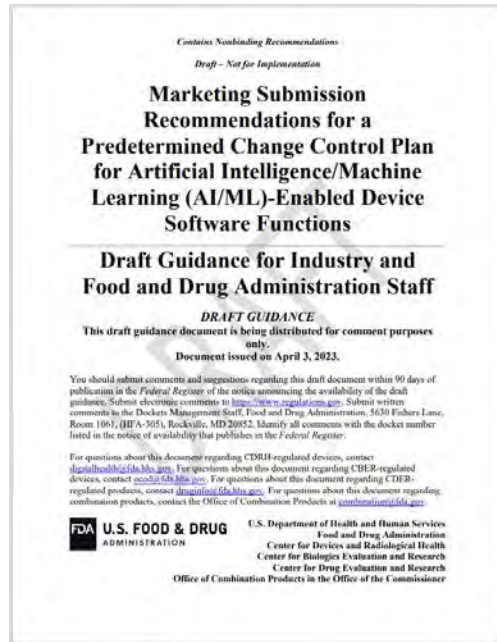
Augmented Reality
/ Virtual Reality

Digital health technology (DHTs) can help bridge the divide.

Predetermined Change Control Plans for AI/ML-Enabled Devices



Predetermined Change Control Plans (PCCPs) can support ensuring that AI/ML-enabled devices better meet the needs of diverse populations.



The FDA's proposed approach to PCCPs would:

- Put safe and effective advancements in the hands of health care providers and users faster.

<https://www.fda.gov/regulatory-information/search-fda-guidance-documents/marketing-submission-recommendations-predetermined-change-control-plan-artificial>

Supporting FDA's Strategic Priority to Promote Health Equity

- PCCPs can further FDA's strategic priority by:
 - Facilitating more rapid and continuous improvement of AI/ML-enabled device performance across diverse populations
 - Ensuring important performance considerations – including with respect to race, ethnicity, disease severity, gender, age, and geographical considerations – are addressed throughout the total product lifecycle
- Draft guidance proposes to place a significant and increased emphasis on importance of clearly communicating valuable information about these considerations to device users





Continuing our Collaborative Approach

2019	2020	2021	2022	2023
<ul style="list-style-type: none">Published AI/ML-SaMD Discussion PaperFirst joined Collaborative Community related to AI/ML	<ul style="list-style-type: none">Public Workshop on AI/ML in Radiological ImagingPEAC Meeting on Patient Trust in AI/ML Devices	<ul style="list-style-type: none">Published AI/ML Medical Device Software Action PlanPosted List of Currently Marketed AI/ML DevicesPublic Workshop on Transparency of AI/ML DevicesPublished Good Machine Learning Practice Principles	<ul style="list-style-type: none">Contributed to IMDRF's Key Terms & Definitions: Machine Learning Enabled Medical DevicesPublished Clinical Decision Support (CDS) Final GuidanceUpdated List of Currently Marketed AI/ML DevicesRecognized new Consensus Standard on AI/ML	<ul style="list-style-type: none">Published Predetermined Change Control Plan for AI/ML Devices Draft Guidance



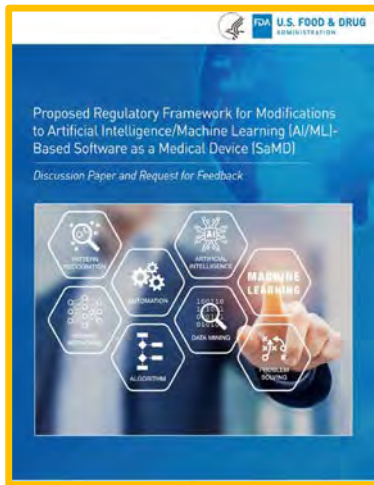
We recognize that by working collaboratively with stakeholders we can lay out a clear path toward building a proactive patient-centered approach to the development and use of AI/ML-enabled devices.

FDA's Collaborative Patient-Centered Approach to AI/ML-Enabled Devices



2019

Discussion Paper



Proposed regulatory framework for modifications to AI/ML-enabled medical device software to assure their safety and effectiveness, including pre-specification of software changes to enable rapid improvement of software products

2021

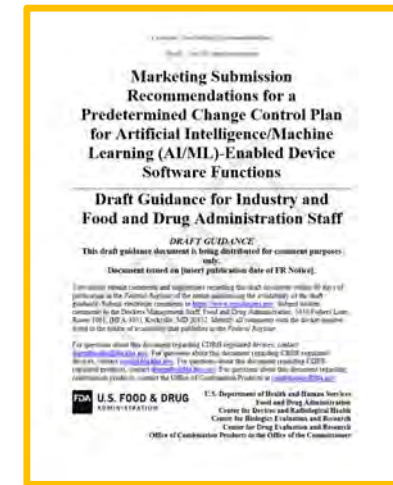
Action Plan



Holistic, patient-centered strategic approach to AI/ML-enabled devices that promotes health equity, including aims to update the proposed regulatory framework and foster a patient-centered approach, including transparency to users

2023

Draft Guidance



Proposed, least burdensome approach to support safe, iterative improvement through modifications to an AI/ML-enabled device

Purpose and Scope

Scope of Draft Guidance

- Applicable to machine learning-enabled device software functions (ML-DSFs) that a manufacturer intends to modify over time
- Describes proposed recommendations on information to be included in a Predetermined Change Control Plan (PCCP) provided as part of a marketing submission
- Generally, recommendations apply to device constituent part of a combination product, when the device constituent part is (or includes) an ML-DSF
- PCCP is an optional mechanism within a marketing submission for premarket authorization for modifications to an ML-DSF

Proposed Approach for Modifications for Machine- Learning Device Software Functions (ML-DSF)

Draft Policy for PCCPs

An authorized PCCP specifies planned modifications that, if not included in a PCCP, could otherwise require a new marketing submission*

The modifications can be implemented to the ML-DSF without triggering the need for a new marketing submission

Modifications made to an ML-DSF that are not specified in the authorized PCCP could require a new marketing submission*

*Note: pursuant to 21 CFR 807.81(a)(3) and 21 CFR 814.39(a), and in accordance with the “Modifications” guidances. For a list of the “Modifications” guidances, please see the Resources slide.

Proposed Components of PCCPs

Description of Modifications

“What” a manufacturer intends the algorithm to become as it learns

- Identifies specific, planned modifications to ML-DSF that the manufacturer intends to implement
- Draws a “range of FDA-authorized specifications” around initial device characteristics and performance

Modification Protocol

“How” the algorithm will learn/change while remaining safe and effective

- Describes methods that will be followed when developing, validating, and implementing the modifications to ensure the device remains safe and effective
- Methods described in Modification Protocol should be consistent with and support the modifications outlined in Description of Modifications

Impact Assessment

Describes modifications’ benefits and risks, and how risks are mitigated

- Assesses benefits and risks of each individual modification, as well as collective impact of modifications, included in the Description of Modifications
- Discusses how activities proposed within Modification Protocol mitigate identified risks to continue to reasonably ensure the safety and effectiveness of the device

Predetermined Change Control Plan

Proposed PCCP Recommendations for Marketing Submissions

Establishing a PCCP

- A PCCP is included in a marketing submission for a device and established as part of that authorization*
- An “authorized PCCP” is one that has been reviewed and established through the device marketing authorization
- To establish a new PCCP for a previously authorized device, the marketing submission must include appropriate marketing submission requirements and the proposed PCCP for the device

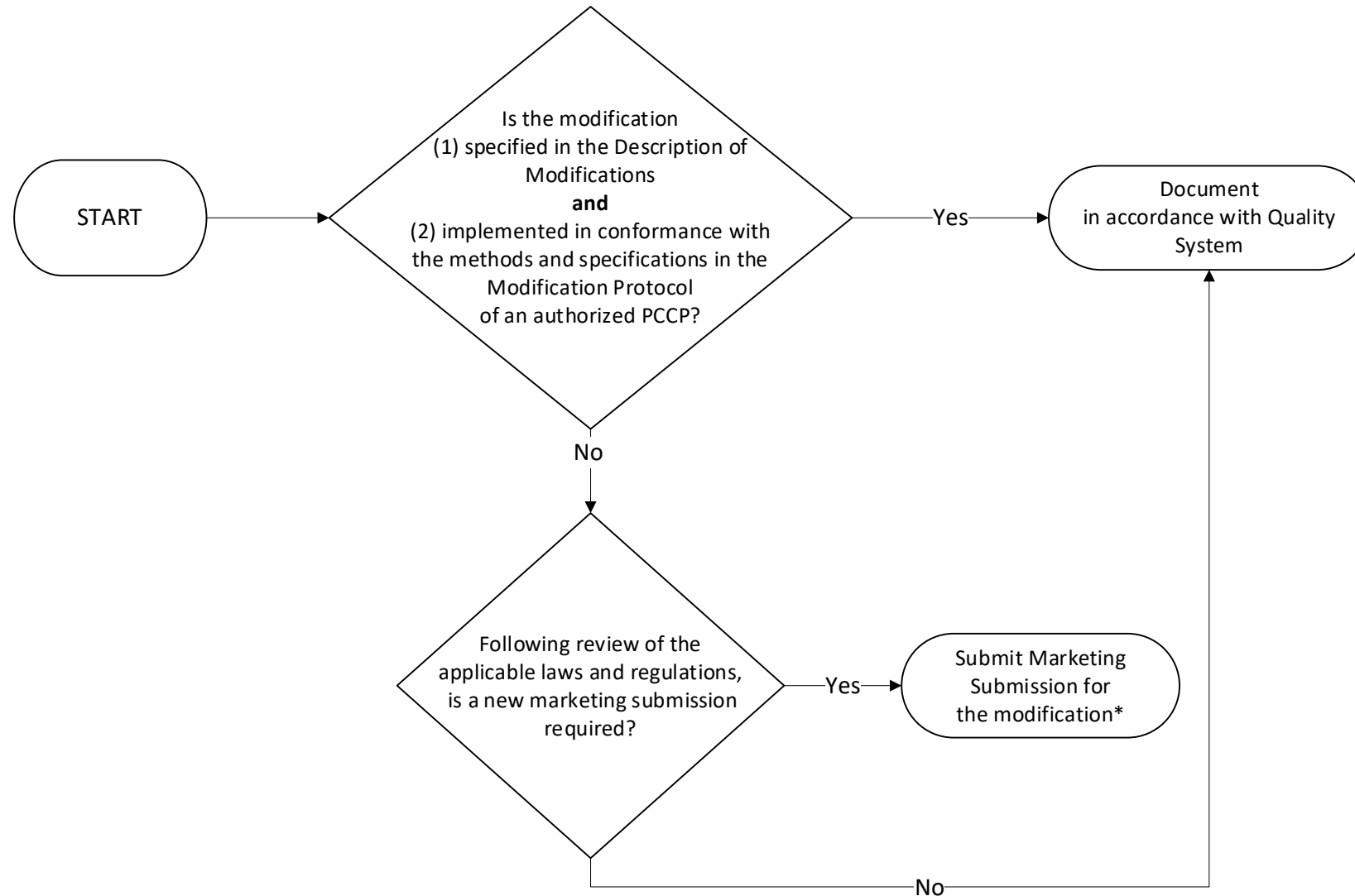
*Note: The term “authorization” is used to include clearance of a 510(k), granting of a De Novo, or approval of PMA

Identifying a PCCP in a Marketing Submission



- In the marketing submission, the PCCP:
 - should be a standalone section, noted in the cover letter, and listed in the table of contents as “Predetermined Change Control Plan”
 - should be discussed as part of the device description, labeling, and other relevant sections
- The PCCP should be described in the:
 - 510(k) summary,
 - De Novo decision summary, or
 - PMA summary of safety and effectiveness document (SSED) and approval order
- Details of the PCCP should be included in sufficient detail to **support transparency to users** regarding the safety and effectiveness of the device
- Labeling should include an adequate description to **ensure appropriate use of the device**

Using an Authorized PCCP to Implement Modifications



Modification Protocol

“How” the algorithm will learn/change while remaining safe and effective

Modification Protocol



- Methods described in Modification Protocol should be **consistent with and support** modifications outlined in Description of Modifications
- Four primary components of a Modification Protocol:
 - (1) data management practices,
 - (2) re-training practices,
 - (3) performance evaluation protocols, and
 - (4) update procedures, including communication and transparency to users and real-world monitoring plans
- Include description of how proposed methods are similar to, or are different from, methods used elsewhere in marketing submission

Traceability between Modification Protocol and Description of Modifications

PCCP should clearly delineate which parts of Modification Protocol are applicable to each modification within Description of Modifications

	Modification Protocol Component			
Modification	Data management practices	Re-training practices	Performance evaluation	Update procedures
Modification #1	Method A (see Section X.A)	Method D (see Section X.D)	Method G (see Section X.G)	Method J (see Section X.J)
Modification #2	Method A (see Section X.A)	Method E (see Section X.E)	Method H (see Section X.H)	Method J (see Section X.J)
Modification #3	Method B (see Section X.B)	Method F (see Section X.F)	Method I (see Section X.I)	Method J (see Section X.J)

Table 1. Example of Description of Modifications to Modification Protocol Traceability Table

Impact Assessment

Describes modifications' benefits and risks,
and how risks are mitigated

Impact Assessment

Documentation for an Impact Assessment provided to the Agency in a marketing submission containing a PCCP should:

1

Compare version of device with each modification implemented to version of device without any modifications implemented

2

Discuss benefits and risks of each individual modification

3

Discuss how activities proposed within Modification Protocol continue to reasonably ensure safety and effectiveness of device

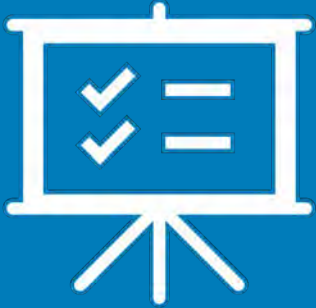
4

Discuss how implementation of one modification impacts implementation of another

5

Discuss collective impact of implementing all modifications

KEY POINTS



- ✓ The PCCP draft guidance describes FDA's proposed approach to ML-DSFs to support their iterative development and improvement over time
- ✓ The introduction of PCCPs build on the Agency's longstanding commitment to developing innovative approaches to ensuring safe and effective digital health technologies are available to patients
- ✓ The PCCP Draft guidance introduces proposed recommendations on information to be included in a PCCP provided as part of a marketing submission for an ML-DSF
- ✓ The draft guidance also specifies that modifications made to an ML-DSF in accordance with an authorized PCCP can be implemented to the ML-DSF without a new marketing submission

Further Questions or Feedback



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The Food and Drug Omnibus Reform Act ("FDORA") Included a Provision for PCCPs



FDORA grants authority for PCCPs*

- *Changes to a device consistent with an approved predetermined change control plan do not require a supplemental application. It may also require that change control plans include labeling required for safe and effective use of the device.*



The PCCP provision applies to more than just AI/ML-enabled devices

- *This provision applies to all devices—it is not specific to AI/ML-enabled devices or software devices. It applies to both premarket approval (PMA) applications and 510(k) applications.*

2023 Draft Guidance on PCCPs for AI/ML-Enabled Devices



- *This Draft Guidance provides proposed recommendations specifically for ML-DSFs that a manufacturer intends to modify over time. Consistent with the addition of section 515C, this draft guidance discusses the submission of PCCPs in marketing submissions for ML-DSFs.*

*Per section 3308 of FDORA, Title III of Division FF of the Consolidated Appropriations Act, 2023, enacted on December 29, 2022, which added section 515C to the Federal Food, Drug, and Cosmetic Act (FD&C Act).

Term Mapping



2019 Discussion Paper

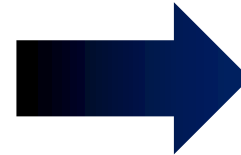
Predetermined Change Control Plan



Current Draft Guidance

Predetermined Change Control Plan

SaMD Pre-Specifications



Description of Modifications

Algorithm Change Protocol



Modification Protocol

Impact



Impact Assessment

SaMD = Software as a Medical Device

Resources/ Modification guidances

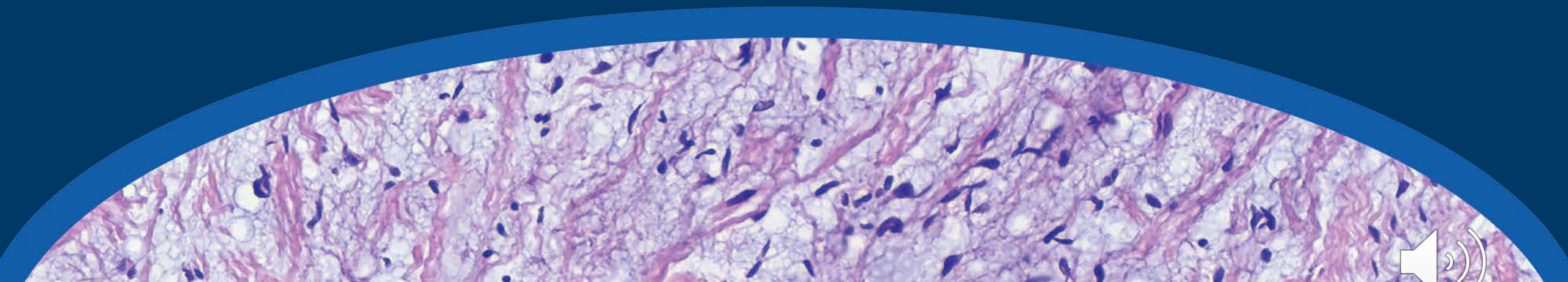


Cited Resource	URL
Deciding When to Submit a 510(k) for a Software Change to an Existing Device	www.fda.gov/regulatory-information/search-fda-guidance-documents/deciding-when-submit-510k-software-change-existing-device
Deciding When to Submit a 510(k) for a Change to an Existing Device	www.fda.gov/regulatory-information/search-fda-guidance-documents/deciding-when-submit-510k-change-existing-device
Modifications to Devices Subject to Premarket Approval (PMA)	www.fda.gov/regulatory-information/search-fda-guidance-documents/modifications-devices-subject-premarket-approval-pma-pma-supplement-decision-making-process
21 CFR 807.81(a)(3)	www.ecfr.gov/current/title-21/chapter-I/subchapter-H/part-807/subpart-E/section-807.81#p-807.81(a)(3)
21 CFR 814.39(a)	www.ecfr.gov/current/title-21/chapter-I/subchapter-H/part-814/subpart-B/section-814.39#p-814.39(a)



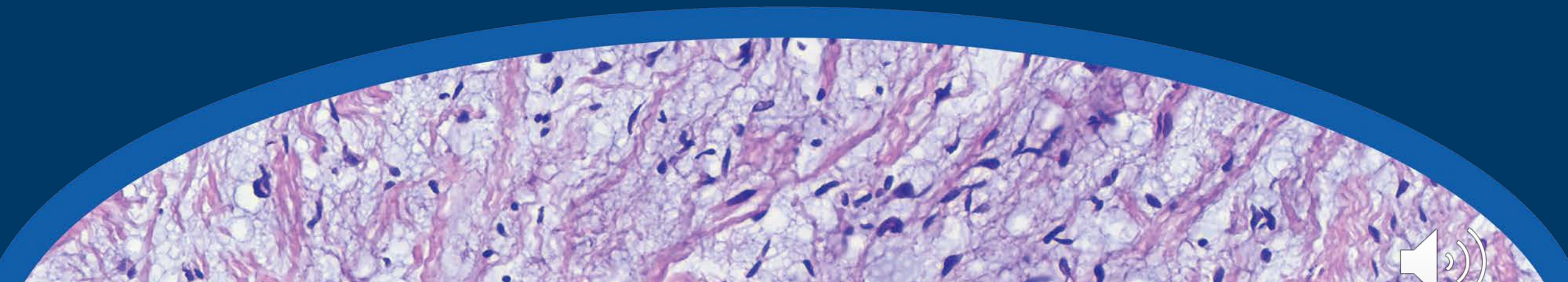
Panel Discussion/Q&A

Moderated by
Ed Margerrison



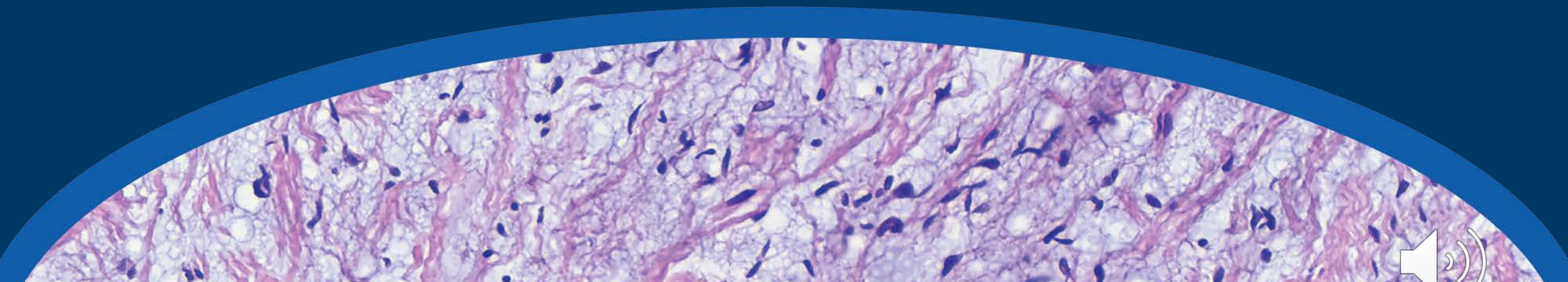


Coffee Break





Breakout Session Topics

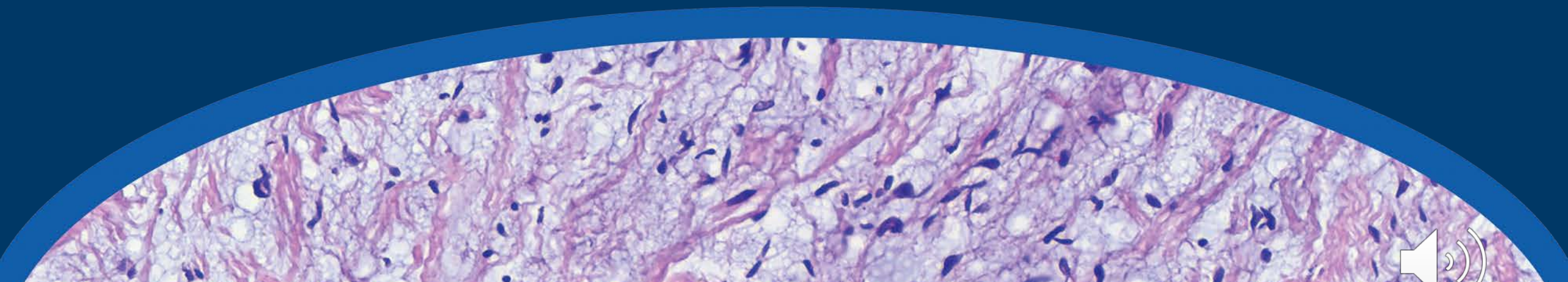




Breakout Session Topics

Remote Work

Mike Isaacs, Matthew Leavitt, Doc de Baca

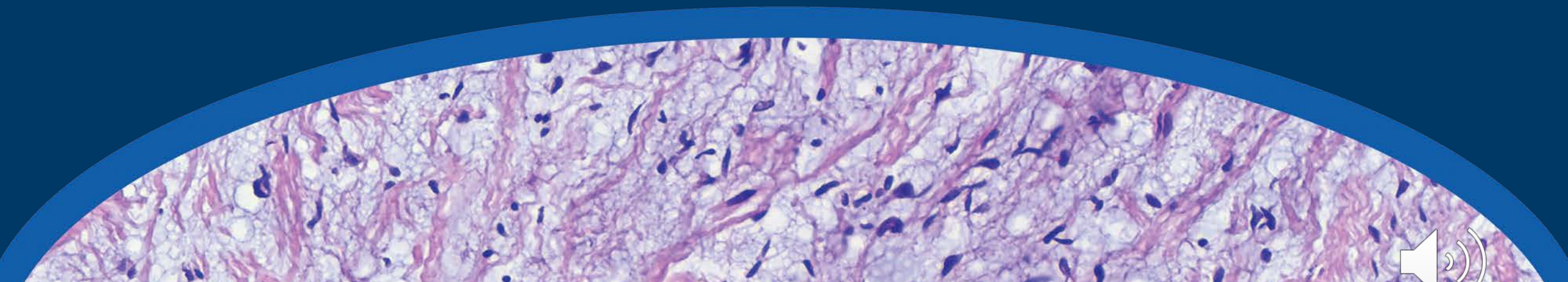




Breakout Session Topics

PCCP

Emre Gulturk, Kevin Schap, Alexej Gossmann

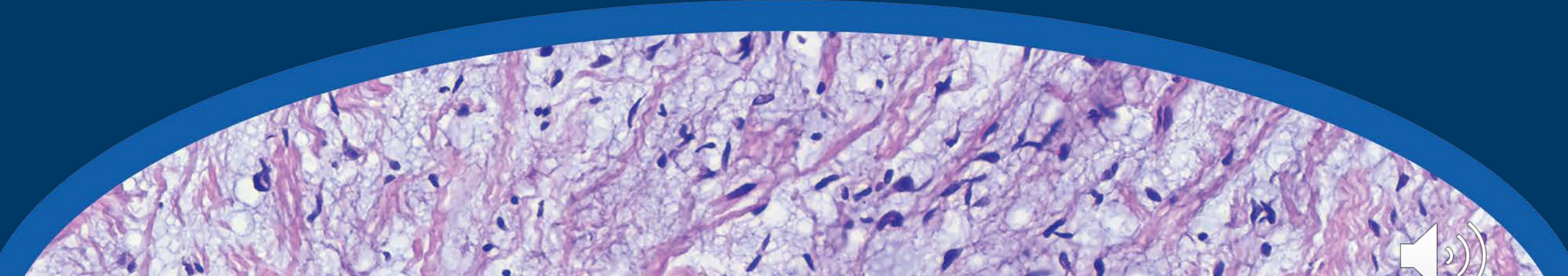




Breakout Session Topics

Statistics

Brandon Gallas, Kim Blenman, Gina Giannini

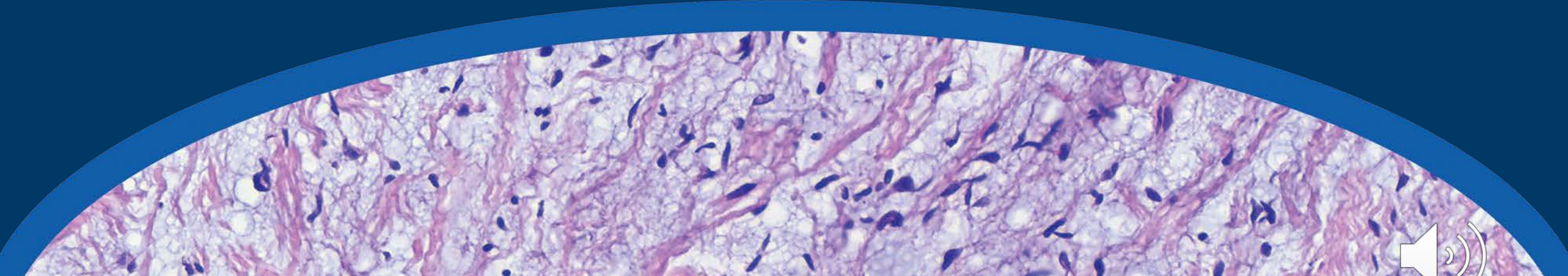




Breakout Session Topics

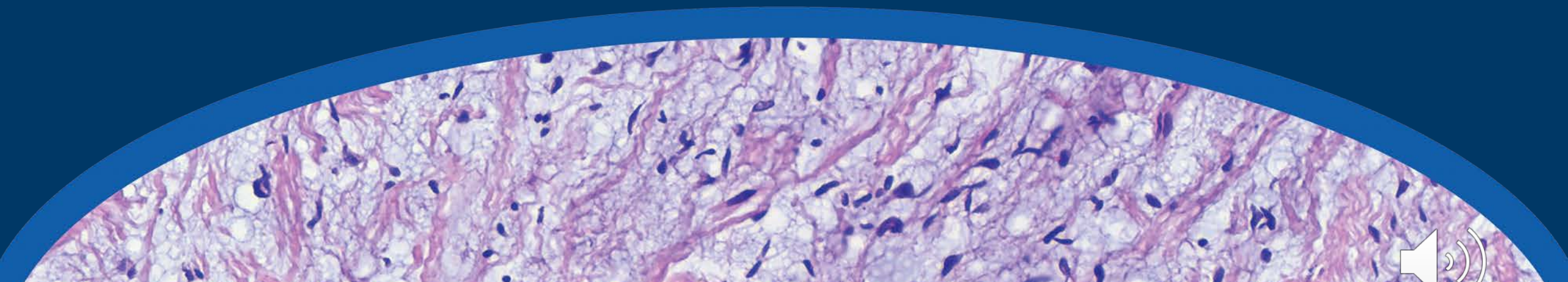
"Open Topic"

Jeni Caldera, Joe Lennerz





Dinner Reception





Plcc23



Plcc23 Day 2

June 28



Plcc23



Welcome



Breakout Session Overview

Introduction of all Participants (each table)

- Name, title, organization – two minutes total

We have identified Breakout Topic Leads

- Deliver 1-slide summary in plenary session (feel free to change if ok)

Rules of Engagement

- Every member in the group should contribute
- Share your experience and perspective
- **Respect** the opinions of others
- Maintain confidentiality and respect antitrust requirements
- Focus on the topic at hand and try not to move on to tangential issues
- Use **parking lot** for important topics for subsequent discussion

Last Five Minutes

- Confirm champion is prepared
- Check 1-slide summary for consolidation and projection in plenary session

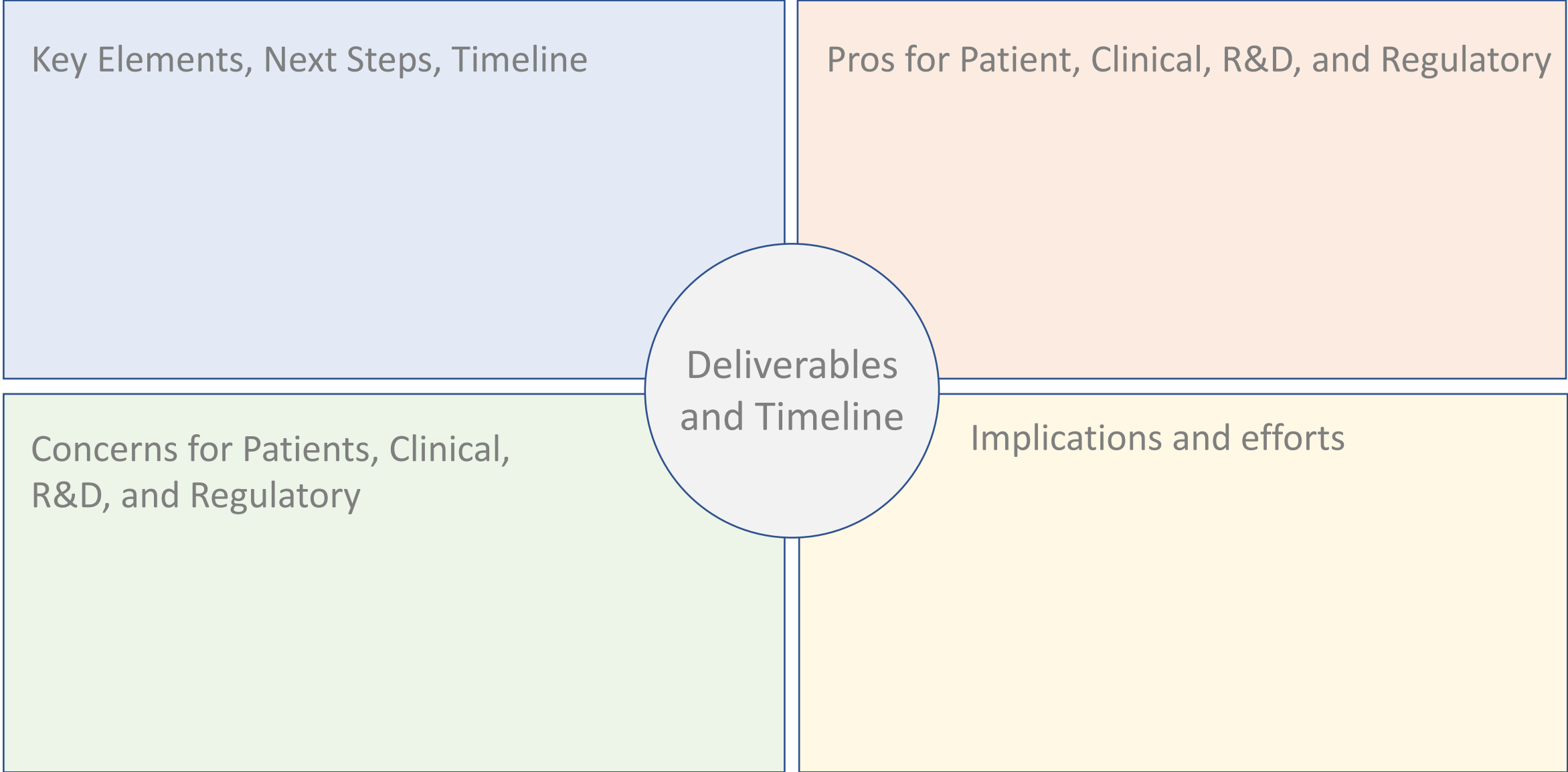


Breakout Session Format

Overview – “Name of the group”

- What is missing to move “XXX” forward
- 3 key elements that the group considered most meaningful next steps including timelines
- What is the goal of this project and timeline?
- “How will these elements be valuable from a clinical, regulatory, and R&D perspective?”
- What is the clinical impact and/or relevance to the patient?
- What are possible concerns/risks to the patient?
- Explain the regulatory implications and advantages of pursuing this project in relation to digital pathology.

BREAKOUT SUMMARY SLIDE: _____ SESSION: _____





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Breakout Session 1



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Remote Work

Mike Isaacs, Matthew Leavit, Doc de Baca, Joe Sirintrapun



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PCCP

Emre Gulturk, Kevin Schap, Alexej Gossmann



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Brandon Gallas, Kim Blenman, Gina Giannini



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Open Topic

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Create Summary Slide



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Coffee Break + Rotate



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Breakout Group Presentations



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Vote



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Keynote II: MedPerf Open and Standardized Benchmarking of Medical Artificial Intelligence

Alex Karargyris



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Breakout Session 2



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Remote Work

Mike Isaacs, Matthew Leavit, Doc de Baca, Joe Sirintrapun



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PCCP

Emre Gulturk, Kevin Schap, Alexej Gossmann



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Open Topic

Jeni Caldera, Joe Lennerz



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Create Summary Slide



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Coffee Break + Rotate



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Breakout Group Presentations



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Lunch

Sponsored by DDX Foundation





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Final Breakout Session



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Create Summary Slide



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Coffee Break + Rotate



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Breakout Group Presentations



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Vote



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Next Steps