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# Clinical data requirements for EC certificate extension

## Clinical data to be included in the Clinical Evaluation Report submitted for application for EC certificate extension under MDD/AIMDD

**1. A recent update of the state-of-the-art review**

1.1 A Clinical Evaluation Plan is the basis for the clinical evaluation process; it has to be suitable for the life cycle phase of a medical device and define the scope, extend and purpose of a clinical evaluation.

1.2 A Clinical Evaluation Report (CER) not older than six months shall include a documented systematic literature review not older than 12 months at time of submission. This is to ensure that the most recent data available according to the requirements outlined in the MEDDEV 2.7.1 Guidance Document are covered. This review shall include a protocol for identification, selection, collation, and review of relevant publications comprising search terms, data bases, and criteria for the inclusion/exclusion, appraisal, and analysis of particular references. To enable a thorough review of the current state of the art as described below it is recommended to chose a two-stage approach with regard to the conduct of the literature search, i.e. start with a general literature search which covers all medical indications to be treated with the device under assessment, followed by a focused search on the device under assessment, its competitor(s), and comparable devices.

1.3 Review of the current state of the art is to be understood as a detailed discussion about limitations and benefits of the following:

- Surgical, nonsurgical, conventional, and medicinal therapeutic alternatives for the same specific medical indication which the assessed device is intended for
- Competitor and comparable devices used for the same medical indication with the same intended use

1.4 A justification if the assessed device can still be regarded to be in compliance with the state of the art

**2. A recent update of the statement on consultation**

If the device contains a medicinal product or if it is a device utilizing materials of animal origin, or if it is a device assisted by human blood derivatives, the manufacturer has to provide an updated statement on the rationale and justification for the use of the medicinal product, the material of animal origin, or the human blood derivatives for each product type. The statement shall include a rationale why a reconsultation of the relevant CA since the last EC extension process is deemed not necessary.

**3. A comprehensive update on postmarket experience**

3.1 The CER shall include a thorough and critical evaluation of the up-to-date postmarket experience not older than six months. This shall include data and explanations such as:

- Marketing period
- Number of devices sold
- Number and type of complaints
- Number and type of incidents, vigilance, and any available trend reports
- Analysis of explanted devices (as far as available and applicable)
- Use as a custom-made device (if applicable)

- Use under compassionate use/humanitarian exemption programs and other user reports (if applicable)
- Corrective actions (if yes, add description)
- FSCA (if yes, add description)

3.2 A scientifically sound rationale why the rate of certain complications can be considered acceptable when compared to the current state of the art

3.3 In case data from an extended premarket or a postmarket clinical follow-up study are available, the study plan and study report (interim or final) has to be provided as well as other applicable study documentation (ethics committee opinions and approval letters issued by respective authorities, if applicable). The decision criteria described in MEDDEV 2.12/2 should be considered. The conduct of a clinical investigation/study shall follow GCP methods such as EN ISO 14155.

3.4 Registry data (if available) or any other data from active postmarket surveillance (prospective or retrospective)

3.5 All these data have to be broken down to different sizes/models and system components of the device.

**Note:** A pure description of the postmarket experience might not be adequate. A critical evaluation of the data with regard to acceptability of certain complications/ complaint rates is needed. This is applicable not only for device-related, but also for procedure-related complications/complaints. If any of the items listed above is not applicable, this shall be stated. Each data set should be weighed against its scientific validity and quality, based on adequate criteria.

**4. Conclusions in the CER**

The CER for extension application shall include at least, but not limited to, the following conclusions:

- A clear statement concerning ongoing compliance to Essential Requirements
- A clear statement on the usefulness of the medicinal product, the material of animal origin, or the human blood derivatives for each product type (if relevant)
- Acceptability of the benefit/risk profile according to current knowledge/the state of the art in the medical fields concerned and according to all available medical alternatives
- Adequacy of the information materials supplied by the manufacturer whether all claims are supported by clinical evidence
- A critical discussion and evaluation of the recent PMS data including a clear PMS plan covering the need of further PMCF activities or studies
- The date and rationale for the next planned update of the CER
- In case the clinical evaluation still follows the version 3 of the MEDDEV 2.7/1 a plan for the implementation of the state-of-the-art methodology of clinical evaluation as described per example in the MEDDEV 2.7/1 rev.4 or comparable methods

**5. A current version of the instructions for use (IFU)** including intended use, indications, contraindications, and the risks/side effects is required. The content of the instructions for use has to be in consistence with the complete technical documentation and any promotional material.

5.1 If the IFU contain references to certain publications/ published studies, it shall be ensured that these publications/published studies still reflect the current state of the art.

**6. A current version of the risk analysis** presenting any unacceptable risk detected after market release is required in addition.

**7. Documentation about changes**

With any clinical documentation submitted for the renewal of an EC certificate under MDD/AIMDD, the list of substantial and insubstantial changes including a description of all clinically relevant bench and/or preclinical tests and/or postmarket clinical activities or studies that were conducted to support the implementation of these changes shall be added.

7.1 In case of substantial changes, the updated CER has to highlight these changes and the related clinical evidence supporting the positive benefit-risk ratio of the assessed device.

7.2 Both order numbers of the change approvals and the approval dates shall be made available during the renewal phase of the EC certificate under MDD/AIMDD.

7.3 The list of changes implemented to the IFU since the last renewal phase shall be provided.

**8. A rationale on the selection, qualification and level of expertise** of the involved evaluator(s) and their declaration of interest.

**Your contact partner at TÜV SÜD Product Service can provide further information.**

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