

Contains Nonbinding Recommendations Draft – Not for Implementation

Content of Human Factors Information in Medical Device Marketing Submissions

Draft Guidance for Industry and Food and Drug Administration Staff DRAFT GUIDANCE

This draft guidance document is being distributed for comment purposes only.

Document issued on December 9, 2022.

You should submit comments and suggestions regarding this draft document within 90 days of publication in the Federal Register of the notice announcing the availability of the draft guidance. Submit electronic comments to <https://www.regulations.gov>. Submit written comments to the Dockets Management Staff, Food and Drug Administration, 5630 Fishers Lane, Room 1061, (HFA-305), Rockville, MD 20852. Identify all comments with the docket number listed in the notice of availability that publishes in the Federal Register.

For questions about this document, contact OHT3: Office of Gastro-Renal, ObGyn, General Hospital, and Urology Devices/DHT3C: Division of Drug Delivery and General Hospital Devices and Human Factors at (301) 796-5580.

When final, this guidance is intended to be used to complement the FDA guidance “Applying Human Factors and Usability Engineering to Medical Devices” issued February 3, 2016. After reviewing public comment on this draft guidance and upon its finalization, FDA intends to concurrently revise the “Applying Human Factors and Usability Engineering to Medical Devices” guidance, as described herein.

Table of Contents

I. Introduction.....	1
II. Scope.....	3
III. Definitions.....	3
IV. Risk-based approach to human factors engineering information in marketing submissions..	5
A. How to determine HF Submission Category	8
B. What to include in a marketing submission based on HF Submission Category	9
V. Recommended content of human factors information in marketing submissions	11
VI. Examples.....	15
A. Modification to an existing 510(k)-cleared device	15
B. Modification to an existing PMA-approved device.....	19
C. New devices	22

I. Introduction

FDA is committed to fostering the development of and patient access to innovative medical devices while balancing their benefits and risks. A unique aspect of medical devices is the critical role of device-user interface interactions for their safe use. Manufacturers routinely perform human factors assessments of the human-device interface during device development. This guidance provides a risk-based framework to guide manufacturers and FDA staff on the human factors information that should be included in a marketing submission to the Center for 21 Devices and Radiological Health (CDRH) to facilitate the efficiency of the FDA review process.

FDA は、利点とリスクのバランスを取りながら、革新的な医療機器の開発と患者のアクセスを促進することに取り組んでいます。医療機器のユニークな側面は、安全に使用するためのデバイスとユーザー インターフェイスの相互作用の重要な役割です。製造業者は、デバイスの開発中にヒューマン デバイス インターフェイスの人的要因評価を定期的に行います。このガイダンスは、FDA 審査プロセスの効率化を促進するために、Center for 21 Devices and Radiological Health (CDRH) へのマーケティング申請に含める必要がある人的要因に関する情報について、メーカーと FDA スタッフをガイドするためのリスクベースのフレームワークを提供します。

The goal of the human factors assessment is to ensure that the device user interface has been designed such that use errors that occur during use of the device that could cause harm or degrade medical treatment are either eliminated or reduced to the extent possible. The main factors to consider in a risk-based approach to human factors assessment, as described in this draft guidance, include the identification of (i.e., presence of or modification to) critical tasks and the elimination or reduction of use-related hazards.

ヒューマン ファクター アセスメントの目的は、デバイスのユーザー インターフェイスが、デバイスの使用中に発生する危害や医療の質の低下を引き起こす可能性のある使用エラーを可能な限り排除または削減するように設計されていることを確認することです。このドラフトガイダンスで説明されているように、人的要因評価へのリスクベースのアプローチで考慮すべき主要因には、重要なタスクの特定（つまり、存在または変更）および使用関連の危険の排除または削減が含まれます。

This guidance includes recommendations for the content of human factors and usability engineering information to be included in marketing submissions. FDA's decision on a medical device marketing submission is based on the applicable statutory and regulatory criteria (e.g., substantial equivalence for premarket notification (510(k)) submissions, reasonable assurance of safety and effectiveness for premarket approval applications (PMAs) or De Novo classification requests (De Novo requests)). Human factors, to the extent relevant, constitute just one 36 component of FDA's assessment. While FDA believes that it is optimal to minimize use-related risks, it may not be necessary, nor practical, to eliminate all use-related device risks. このガイダンスには、人的要因の内容と、マーケティング提出物に含まれるユーザビリティ エンジニアリング情報の推奨事項が含まれています。医療機器のマーケティング申請に関する FDA の決定は、適用される法規制基準（例えば、市販前通知（510(k）申請の実質的同等性、市販前承認申請（PMA）の安全性と有効性の合理的な保証、または De Novo 分類）に基づいています。リクエスト（De Novo リクエスト）。人的要因は、関連する範囲で、FDA の評価の 36 構成要素の 1 つにすぎません。FDA は、使用に関連するリスクを最小限に抑えることが最適であると考えていますが、使用に関連するデバイスのリスクをすべて排除することは必要ではなく、実際的でもない場合があります。

The marketing submission should, where appropriate, demonstrate that the needs of the intended users were considered in the device design and that the device is safe and effective for the intended users, uses, and use environments. Thus, marketing submissions should include, where appropriate, information that explains the presence or absence of critical tasks, validation testing for risk mitigation strategies, and a description of residual risks. Including appropriate human factors information may improve the efficiency of FDA review by reducing the number of requests for additional information.

マーケティングへの提出物は、必要に応じて、意図されたユーザーのニーズがデバイスの設計で考慮されたこと、およびデバイスが意図されたユーザー、用途、および使用環境にとって安全で効果的であることを実証する必要があります。したがって、**マーケティングの提出物には、必要に応じて、重要なタスクの有無を説明する情報、リスク軽減戦略の検証テスト、および残留リスクの説明を含める必要があります。**適切な人的要因の情報を含めることで、追加情報の要求の数が減り、FDA の審査の効率が向上する可能性があります。

After considering stakeholder feedback on the draft guidance “List of Highest Priority Devices for Human Factors Review,” FDA has decided that it should issue another draft guidance regarding submission of human factors information for the purposes of premarket review, which will supersede the draft guidance “List of Highest Priority Devices for Human Factors Review.”

ドラフトガイダンス「ヒューマンファクターレビューのための最優先デバイスのリスト」に関する利害関係者のフィードバックを検討した後、FDA は、ドラフトガイダンスに取って代わる、市販前レビューを目的としたヒューマンファクター情報の提出に関する別のドラフトガイダンスを発行する必要があると決定しました。ヒューマンファクターレビューの最優先デバイスのリスト。

When finalized, this draft guidance is intended to be used to complement the FDA guidance “Applying Human Factors and Usability Engineering to Medical Devices” (hereafter referred to as the Human Factors Guidance). The purpose of the Human Factors Guidance is to recommend and guide manufacturers through human factors engineering processes during the development of new medical devices, focusing specifically on the user interface. That guidance provides relevant human factors definitions and recommends useful preliminary analysis and evaluation tools and validation testing that will enable manufacturers to assess and reduce risks associated with medical device use. The purpose of the current guidance is to help manufacturers apply a risk-based approach when considering what human factors information to include in a marketing submission.

最終版のガイダンス案は、FDA ガイダンス「医療機器へのヒューマンファクターとユーザビリティエンジニアリングの適用」(以降、ヒューマンファクターガイダンスと呼ぶ)を補完するために使用されることを意図しています。ヒューマンファクターガイダンスの目的は、特にユーザーインターフェイスに焦点を当てた新しい医療機器の開発中に、ヒューマンファクターエンジニアリングプロセスを通じてメーカーを推奨し、ガイドすることです。そのガイダンスは、関連する人的要因の定義を提供し、製造業者が医療機器の使用に関連するリスクを評価および軽減できるようにする、有用な予備分析および評価ツールと検証テストを推奨しています。現在のガイダンスの目的は、**製造業者がマーケティング申請に含める人的要因情報を検討する際にリスクベースのアプローチを適用できるようにすることです。**

After reviewing public comment on this draft guidance and upon its finalization, FDA intends to concurrently revise the Human Factors Guidance to incorporate the definitions included in this guidance, superseding the definitions in Section 3 of the Human Factors Guidance. FDA also intends to concurrently revise the Human

Factors Guidance by replacing Section 9 “Documentation” and Appendix A “Human Factors and Usability Engineering Report” of the Human Factors Guidance with cross-references to Section V of this guidance, and by making any other revisions to the Human Factors Guidance as appropriate.

このガイダンス草案に対するパブリック コメントを検討した後、最終化された時点で、FDA はヒューマン ファクター ガイダンスを同時に改訂して、ヒューマン ファクター ガイダンスのセクション 3 の定義に取って代わり、このガイダンスに含まれる定義を組み込む予定です。FDA はまた、ヒューマン ファクター ガイダンスのセクション 9「ドキュメンテーション」と付録 A「ヒューマン ファクターおよびユーザビリティ エンジニアリング レポート」をこのガイダンスのセクション V への相互参照に置き換え、その他の改訂を行うことにより、ヒューマン ファクター ガイダンスを同時に改訂する予定です。必要に応じてヒューマン ファクター ガイダンスを参照してください。

For the current edition of the FDA-recognized consensus standard(s) referenced in this document, see the FDA Recognized Consensus Standards Database. For more information regarding use of consensus standards in regulatory submissions, please refer to the FDA guidance titled “Appropriate Use of Voluntary Consensus Standards in Premarket Submissions for Medical Devices.”

このドキュメントで参照されている FDA 承認コンセンサス標準の最新版については、FDA 承認コンセンサス標準データベースを参照してください。規制当局への申請におけるコンセンサス基準の使用に関する詳細については、「医療機器の市販前申請における自主的コンセンサス基準の適切な使用」というタイトルの FDA ガイダンスを参照してください。

FDA recognizes and anticipates that the Agency and industry may need up to days to perform activities to operationalize the policies within this guidance. If new information regarding the content of human factors information for marketing submissions is not included in a marketing submission received by FDA before or up to 60 days after the publication of the final guidance, CDRH staff does not generally intend to request such information during the review of the submission. CDRH does, however, intend to review any such information, if submitted.

FDA は、FDA および業界がこのガイダンス内のポリシーを運用可能にするための活動を実行するのに最大数日かかる可能性があることを認識し、予測しています。マーケティング申請のための人的要因情報の内容に関する新しい情報が、最終ガイダンスの発行前または発行後 60 日以内に FDA が受け取ったマーケティング申請に含まれていない場合、CDRH スタッフは通常、レビュー中にそのような情報を要求するつもりはありません。提出の。ただし、CDRH は、提出された場合、そのような情報を確認するつもりです。

In general, FDA’s guidance documents do not establish legally enforceable responsibilities. Instead, guidances describe the Agency’s current thinking on a topic and should be viewed only as recommendations, unless specific regulatory or statutory requirements are cited. The use of the word should in Agency guidance means that something is suggested or recommended, but not required.

一般に、FDA のガイダンス文書は、法的強制力のある責任を確立していません。代わりに、ガイダンスはトピックに関する当局の現在の考え方を説明しており、特定の規制または法定要件が引用されていない限り、推奨事項としてのみ見なされるべきです。エージェンシーのガイダンスでのべきという言葉の使用は、何かが提案または推奨されているが、必須ではないことを意味します。

II. Scope

This guidance is intended to help submitters and FDA staff determine what human factors evaluation information should be included in marketing submissions for medical devices, including 510(k)s, De Novo requests, PMAs, including PMA supplements, and humanitarian device exemption (HDE) applications.

このガイダンスは、提出者と FDA スタッフが、510(k)、De Novo 要求、PMA サプリメントを含む PMA、および人道的機器免除 (HDE) を含む、医療機器のマーケティング提出にどのような人的要因評価情報を含める必要があるかを判断するのに役立つことを目的としています。 アプリケーション。

The guidance is not intended to inform manufacturers about how to perform a human factors evaluation. This guidance is also not intended to describe when a marketing submission should be submitted to legally market a new or modified device.

このガイダンスは、人的要因評価の実施方法について製造業者に知らせることを意図したものではありません。また、このガイダンスは、新しいデバイスまたは変更されたデバイスを合法的に販売するためにいつマーケティング申請を提出する必要があるかを説明することも意図していません。

III. Definitions

The following definitions apply for the purposes of this guidance:

- **Abnormal use:** An intentional act or intentional omission of an act that reflects violative or reckless use or sabotage beyond reasonable means of risk mitigation or control through design of the user interface.
- **Critical task:** A user task which, if performed incorrectly or not performed at all, would or could cause serious harm to the patient or user, where harm is defined to include compromised medical care.
誤って実行された場合、またはまったく実行されなかった場合に、患者またはユーザーに深刻な危害を与える、または引き起こす可能性があるユーザー タスク。危害には医療ケアの危険性が含まれると定義されている。
- **Formative evaluation:** User interface evaluation conducted with the intent to explore user interface design strengths, weaknesses, and unanticipated use errors.
- **Harm:** Injury or damage to the health of people, or damage to property or the environment.
- **Hazard:** Potential source of harm.
- **Hazardous situation:** Circumstance in which people, property or the environment is/are exposed to one or more hazards.
- **Human factors engineering:** Application of knowledge about human behavior, abilities, limitations, and other characteristics to the design of medical devices (including software), systems and tasks to achieve adequate usability.
- **Human factors validation testing:** Testing conducted at the end of the device development process to assess user interactions with a device user interface to identify use errors that would or could result in serious harm to the patient or user. Human factors validation testing is also used to assess the effectiveness of risk management measures. Human factors validation testing represents one portion of design validation.
- **Normal use:** Operation, including routine inspection and adjustments by any user, and stand-by, according to the instructions for use or in accordance with generally accepted practice for those medical devices provided without instructions for use.
- **Residual risk:** Risk remaining after risk control measures have been implemented.
- **Serious harm:** Includes both serious injury and death.

- ・ **Serious injury:** An injury or illness that is life-threatening, results in permanent impairment of a body function or permanent damage to a body structure, or necessitates medical or surgical intervention to preclude permanent impairment of a body function or permanent damage to a body structure. Permanent means irreversible impairment or damage to a body structure or function, excluding trivial impairment or damage. 生命を脅かす、身体機能の恒久的な障害または身体構造への恒久的な損傷をもたらす、または身体機能の恒久的な障害または身体構造への恒久的な損傷を防ぐために医学的または外科的介入を必要とする怪我または病気。 恒久的とは、身体構造または機能に対する不可逆的な障害または損傷を意味しますが、些細な障害または損傷は除きます。
- ・ **Task:** One or more user interactions with a medical device to achieve a desired result.
- ・ **Use environment:** Actual conditions and setting in which users interact with the medical device.
- ・ **Use error:** User action or lack of action that was different from that expected by the manufacturer and caused a result that (1) was different from the result expected by the user and (2) was not caused solely by device failure and (3) did or could result in harm.
- ・ **Use safety:** How safe a device is when used or the extent to which risks of harm resulting from use error for medical devices have been either reduced to an acceptable level or eliminated completely.
- ・ **User:** Person interacting with (i.e., operating or handling) the medical device.
- ・ **User interface:** Means by which the user and the medical device interact.
- ・ **Use-related risk:** Combined probability, occurrence, and severity of harm for a given aspect of device use or for the overall use of a device.
- ・ **Use-related risk analysis:** Systematic use of available information to identify use-related hazards and to estimate the use-related risk.

IV. Riskbased approach to human factors engineering information in marketing submissions

The purpose of including human factors engineering information in a marketing submission is to help the manufacturer meet the applicable legal standard by demonstrating that the user interface of the device is appropriate for the intended users, uses, and use environments. This section uses flowcharts, tables, and text to guide submitters through a risk-based approach to recommend what human factors engineering information a submitter should include in their marketing submission.

マーケティング申請にヒューマン ファクター エンジニアリング情報を含める目的は、デバイスのユーザー インターフェイスが意図したユーザー、用途、および使用環境に適していることを実証することにより、製造業者が適用される法的基準を満たすのを支援することです。 このセクションでは、フローチャート、表、およびテキストを使用して、リスクベースのアプローチを通じて提出者をガイドし、提出者がマーケティング提出に含めるべきヒューマン ファクター エンジニアリング情報を推奨します。

FDA refers to this risk-based approach as **the Human Factors (HF) Submission Category**. Submitters should use the flowchart in Figure 1 and use its companion text to answer the questions posed at each decision point to determine which HF Submission Category is appropriate to support their marketing submission.

FDA は、このリスクベースのアプローチを人的要因 (HF) 申請カテゴリと呼んでいます。 提出者は、図 1 のフローチャートを使用し、関連するテキストを使用して、各決定点で提起された質問に回答し、どの HF 提出カテゴリがマーケティング提出をサポートするのに適しているかを判断する必要があります。

This flowchart is based on the device's indications for use and the use-related risk analysis in the context of new devices and devices for which FDA has granted marketing authorization.

このフローチャートは、FDA が販売承認を与えた新しいデバイスおよびデバイスのコンテキストにおけるデバイスの使用適応症および使用関連のリスク分析に基づいています。

FDA based the HF Submission Categories on the presence of or modification to critical tasks, considering changes to technological characteristics or the indications for use, if relevant. Submitters should use the use-related risk analysis and the decision points described below to help determine the HF Submission Category for their marketing submission. Submitters should also reference Table 1 for FDA's recommended human factors engineering information to provide in a marketing submission after they determine which HF Submission Category their submission falls under using Figure 1.

FDA は、重要なタスクの存在または変更に基づいて HF 申請カテゴリを設定し、関連する場合は技術的特性または indications for use の変更を考慮しました。申請者は、マーケティング申請の HF 申請カテゴリを決定するために、以下に説明する使用関連のリスク分析と決定ポイントを使用する必要があります。提出者は、図 1 を使用して提出物がどの HF 提出物カテゴリに該当するかを判断した後、マーケティング提出物で提供するために FDA が推奨する人的要因工学情報についても表 1 を参照する必要があります。

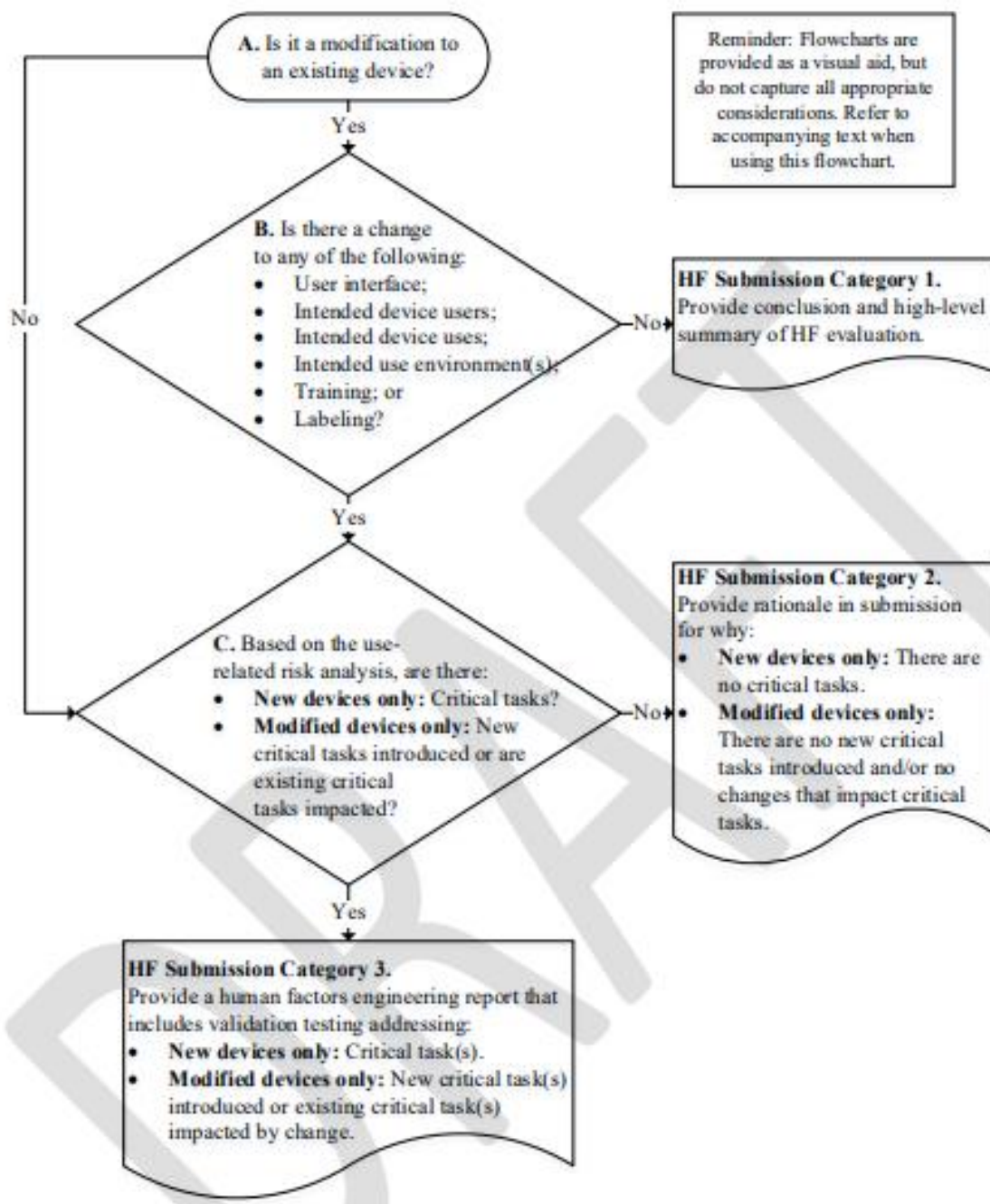


Figure 1. Flowchart illustrating a risk-based approach to determine the HF Submission Category.

A How to determine HF Submission Category

Decision Point A: Is it a modification to an existing device?

Submitters should answer “Yes” to this question when their submission is for a change to a device that has already received marketing authorization from FDA through a 510(k), PMA, HDE application, or De Novo request. Submitters should generally answer “No” if their device is a completely new device that has not received marketing authorization from FDA. Depending on specific facts and circumstances, submitters may be able to answer “Yes” to this question when they are proposing to apply human factors information from one of their own legally marketed devices to a subject device that has the same or a similar user interface.

提出者は、510(k)、PMA、HDE 申請、または De Novo 要求を通じて FDA から既に販売承認を取得している機器への変更を申請する場合、この質問に「はい」と回答する必要があります。デバイスが完全に新しいデバイ

スであり、FDA からの販売承認を受けていない場合、提出者は通常、「いいえ」と回答する必要があります。特定の事実や状況によっては、提出者が合法的に市販されているデバイスの 1 つから同じまたは類似のユーザーインターフェイスを備えた対象のデバイスに人的要因情報を適用することを提案している場合、この質問に「はい」と答えることができる場合があります。

Decision Point B: Is there a change to any of the following:

- ・ User interface;
- ・ Intended device users;
- ・ Intended device uses;
- ・ Intended use environment(s);
- ・ Training; or
- ・ Labeling?
- ・ ユーザーインターフェイス;
- ・ 対象のデバイス ユーザー。
- ・ 意図されたデバイスの使用;
- ・ 使用目的の環境。
- ・ トレーニング; また
- ・ ラベリング?

This question applies to only modified devices and is intended to assess whether there have been any proposed changes that affect the human factors assessment. If the answer to this question is “No,” then the level of information would fall into HF Submission Category 1; however, if the answer is “Yes,” then the submitter should proceed to Decision Point C.

この質問は、変更されたデバイスだけに適用され、人的要因の評価に影響を与える提案された変更があったかどうかを評価することを目的としています。この質問に対する答えが「いいえ」の場合、情報のレベルは HF 提出カテゴリ 1 に分類されます。ただし、答えが「はい」の場合、提出者は判断ポイント C に進む必要があります。

Decision Point C: Based on the use-related risk analysis, are there:

- ・ **New devices only:** Critical tasks?
- ・ **Modified devices only:** New critical tasks introduced or are existing critical tasks impacted? 新しいクリティカル タスクが導入されたか、または既存のクリティカル タスクに影響がありますか?

The use-related risk analysis incorporating risk analysis approaches such as Failure Mode and Effects Analysis (FMEA), analysis of known use problems, and formative evaluation should be referenced to answer this question. For modified devices, FDA recommends that submitters consider the use-related risk analysis on the final finished device and not just modifications to the device. This recommendation is intended to provide a holistic assessment of any critical tasks that could be impacted upstream or downstream from the altered device-user interface component.

この質問に答えるには、故障モード影響分析 (FMEA)、既知の使用上の問題の分析、および形式的評価などのリスク分析アプローチを組み込んだ使用関連のリスク分析を参照する必要があります。修正されたデバイスの場合、FDA は、提出者がデバイスへの修正だけでなく、最終完成したデバイスの使用関連のリスク分析を考慮す

ることを推奨します。この推奨事項は、変更されたデバイス ユーザー インターフェイス コンポーネントから上流または下流に影響を与える可能性のある重要なタスクの全体的な評価を提供することを目的としています。

Each identified critical task should be connected to the use-related risk analysis. When determining if a critical task has been affected by a change to the device-user interface, we recommend considering if those changes influence the cognitive and/or visual perception or the physical interaction between the user and the device. A reduction or increase in the steps to execute a critical task may be considered as affecting the critical task.

特定されたそれぞれの重要なタスクは、使用関連のリスク分析に関連付けられる必要があります。重要なタスクがデバイスとユーザーのインターフェイスの変更によって影響を受けているかどうかを判断するときは、それらの変更が認知や視覚、またはユーザーとデバイス間の物理的な相互作用に影響を与えるかどうかを検討することをお勧めします。重要なタスクを実行する手順の削減または増加は、重要なタスクに影響を与えると見なされる場合があります。

If there are no critical tasks for a new device, or no new critical tasks introduced, and no impacted critical tasks for a modified device based on the use-related risk analysis, the answer to this question is “No,” and the level of information would fall into HF Submission Category 2.

新しいデバイスに重要なタスクがない場合、または新しい重要なタスクが導入されていない場合、および使用関連のリスク分析に基づいて変更されたデバイスに影響を与える重要なタスクがない場合、この質問に対する答えは「いいえ」であり、情報は HF 提出カテゴリ 2 に分類されます。

If the answer is “Yes,” then the level of information would fall into HF Submission Category 3.

答えが「はい」の場合、情報のレベルは HF 提出カテゴリ 3 に分類されます。

B What to include in a marketing submission based on HF Submission Category

Using the flowchart in Figure 1 and its companion text to determine the HF Submission Category, manufacturers should include the following human factors information in marketing submissions:

図 1 のフローチャートとそれに付随するテキストを使用して HF 提出カテゴリを決定する場合、**製造業者は次のヒューマン ファクター情報をマーケティング提出に含める必要があります。**

HF Submission Category 1. Provide conclusion and high-level summary of HF evaluation: The submission should include a statement justifying that the device modifications do not affect the human factors considerations of the modified device and leverage, if applicable, previous human factors engineering evaluations to provide the conclusion and high level summary. See Table 1 for the suggested submission content for devices that fall into HF Submission Category 1.

HF 提出カテゴリ 1. **HF 評価の結論と高レベルの要約**を提供します。提出には、**デバイスの変更が変更されたデバイスの人的要因の考慮事項に影響を与えないことを正当化するステートメント**を含める必要があります。**結論と概要**を提供します。HF サブミッション カテゴリ 1 に分類されるデバイスの推奨サブミッション コンテンツについては、表 1 を参照してください。

HF Submission Category 2. Provide rationale in submission for why: there are no critical tasks (new devices only); or there are no new critical tasks introduced and/or no changes that impact critical tasks (modified

devices only): The submitter should submit a rationale that clearly describes the basis of their decision that there are no critical tasks for a new device, or no new critical tasks introduced, and no impacted critical tasks for a modified device. This rationale should be based on the decision-making noted in Section IV.A that takes the submitter through each decision point. See Table 1 for the suggested submission content for devices that fall into HF Submission Category 2.

HF サブミッション カテゴリ 2. **サブミッションの理由を説明**してください。重要なタスクはありません（新しいデバイスのみ）。新しい重要なタスクが導入されていない、および/または重要なタスクに影響を与える変更がない（変更されたデバイスのみ）：提出者は、**新しいデバイスには重要なタスクがないという決定の根拠を明確に説明する根拠を提出する必要があります**。新しいクリティカル タスクが導入されましたが、変更されたデバイスの影響を受けるクリティカル タスクはありません。 **この論理的根拠は、セクション IV.A に記載されている意思決定に基づいている必要があります**。 HF サブミッション カテゴリ 2 に分類されるデバイスの推奨サブミッション コンテンツについては、表 1 を参照してください。

HF Submission Category 3. Provide a human factors engineering report that includes validation testing addressing: critical task(s) (new devices only; see Table 2); or new critical task(s) introduced or existing critical task(s) impacted by change (modified devices only; see Table 3): A comprehensive human factors engineering report that includes all elements of a human factors engineering report described in Section IV of this guidance should be submitted to FDA for marketing submissions in HF Submission Category 3. Please note that if critical tasks are impacted for a modified device, but existing risk control measures remain acceptable, you should provide your rationale in your submission as part of the human factors information.

HF 提出カテゴリ 3. **検証テストを含むヒューマン ファクター エンジニアリング レポートを提供**します。重要なタスク（新しいデバイスのみ。表 2 を参照）。または変更によって影響を受ける新しいクリティカル タスクまたは既存のクリティカル タスク（変更されたデバイスのみ。表 3 を参照）：**このセクション IV で説明されているヒューマン ファクター エンジニアリング レポートのすべての要素を含む包括的なヒューマン ファクター エンジニアリング レポート ガイダンスは、HF 提出カテゴリ 3 でのマーケティング提出のために FDA に提出する必要があります**。変更されたデバイスの重要なタスクが影響を受けるが、既存のリスク管理手段が引き続き許容される場合は、人的要因の一部として提出に根拠を提供する必要があることに注意してください。 情報。

Table 1. Recommended minimum human factors information that should be provided for a marketing submission based on HF Submission Category

Recommended information (Report section numbers from Section V below)	HF Submission Category		
	1	2	3
Conclusion and high-level summary (Section 1)	✓	✓	✓
Descriptions of: <ul style="list-style-type: none"> Intended device users, uses, use environments, and training (Section 2) Device-user interface (Section 3) Summary of known use problems (Section 4) 		✓	✓
Preliminary activities <ul style="list-style-type: none"> Summary of preliminary analyses and evaluations (Section 5) 			✓
Use-related risk analysis <ul style="list-style-type: none"> Analysis of hazards and risks associated with use of the device (Section 6) Identification and description of critical tasks (Section 7) 			✓
Details of validation testing of final design (Section 8)			✓

Table 2. Example tabular format for the use-related risk analysis

Use-related risk analysis Task #	User Task	Possible use error(s)	Potential hazards and clinical harm	Severity of harm	Critical Task (Y/N)	Risk Mitigation Measure(s) ²⁵	Validation method for effectiveness of risk mitigation measure ²⁶
Task #1							
Task #2							

Table 3. Example tabular format for the comparative use-related risk analysis

Existing Device						Modified Device			Submitter's comparison comments
URRA Task #	User Task	Possible use error(s)	Potential hazards and clinical harm	Severity of harm	Critical task (Y/N)	Comparison of use task description to existing device	Labeling content and/or design change differences	Comparison of proposed risk mitigation measure to existing device	
Task #1									
Task #2									

V. Recommended content of human factors information in marketing submissions

A manufacturer's internal documentation of risk management, human factors engineering testing (when applicable), and design optimization processes can help provide evidence, where appropriate, that the needs of the intended users were considered in the design and that the device is safe and effective for the intended

users, uses, and use environments. The Quality System Regulation (21 CFR part 820) requires that manufacturers of certain finished devices verify and validate device design, review and approve changes to device design, and document changes and approvals in the design history file (21 CFR 820.30). FDA recommends that human factors information be maintained by the manufacturer regardless of whether it is submitted to FDA. Manufacturers must keep records to the extent required under applicable law, including the Quality System Regulation (e.g., 21 CFR 820.30(j)), and these (and other) records must generally be made available to an FDA investigator upon request (see section 704(e) of the Federal Food, Drug, and Cosmetic Act).

リスク管理、ヒューマン ファクタ エンジニアリング テスト (該当する場合)、および設計最適化プロセスに関する製造業者の内部文書は、必要に応じて、意図したユーザーのニーズが設計で考慮されていること、およびデバイスが安全で効果的であることの証拠を提供するのに役立ちます。意図したユーザー、用途、および使用環境。品質システム規則 (21 CFR パート 820) では、特定の完成したデバイスの製造業者がデバイス設計を検証および検証し、デバイス設計の変更をレビューおよび承認し、変更と承認を設計履歴ファイルに記録することを要求しています (21 CFR 820.30)。FDA は、人的要因に関する情報が FDA に提出されるかどうかに関係なく、製造業者によって維持されることを推奨しています。製造業者は、品質システム規則 (例: 21 CFR 820.30(j)) を含む適用法の下で要求される範囲で記録を保持する必要があると、これらの (およびその他の) 記録は、通常、要求に応じて FDA の調査官が利用できるようにする必要があります (セクション 704 を参照)。(e) 連邦食品医薬品化粧品法)。

This section describes the HF information that may be appropriate for submission to FDA in a marketing submission when one is required. This human factors engineering information describes how the human factors engineering process was applied during the development of a medical device. Human factors engineering information should summarize the evaluations performed. Such information does not typically include all raw data from a human factors validation test. The information should discuss the safety-related human factors engineering considerations, processes, issues, resolutions, and conclusions. The information should describe the identification, evaluation, and final assessment of all use-related hazards from using the device.

このセクションでは、必要な場合にマーケティング申請で FDA に提出するのに適した HF 情報について説明します。このヒューマン ファクター エンジニアリング情報は、医療機器の開発中にヒューマン ファクター エンジニアリング プロセスがどのように適用されたかを説明しています。人間工学情報は、実施された評価を要約する必要があります。このような情報には、通常、人的要因の検証テストからの生データがすべて含まれているわけではありません。この情報では、安全関連の人的要因工学の考慮事項、プロセス、問題、解決策、および結論について説明する必要があります。情報は、デバイスの使用によるすべての使用関連の危険の識別、評価、および最終評価を説明する必要があります。

Documents or analyses that are part of the human factors engineering process should be included in the human factors engineering information provided in a marketing submission. This includes portions of risk analyses focusing on user interactions with the device and specific risk analysis processes, results, and conclusions. Such information can also reference materials relevant to the human factors engineering process in other parts of the submission. A recommended structure for this human factors engineering information is further described below:

Section 1: Conclusion and high-level summary

Submitters should begin with a conclusion stating whether the user interface of the device has been found to be adequately designed for the intended users, uses, and use environments and whether new human factors testing was conducted to support this conclusion. FDA recommends that submitters begin with a high-level summary of the human factors engineering assessment (e.g., use-related risks), including the underlying rationale for conducting the assessment, and a summary of the human factors engineering processes conducted (e.g., human factors engineering analyses and evaluations, device-user interface modifications and validation testing) and analysis of the results.

When applicable, this section should discuss any remaining residual use-related risks after human factors validation testing. Submitters should describe why further risk mitigation is not practicable based on a benefit-risk analysis for the device.

提出者は、デバイスのユーザー インターフェイスが意図したユーザー、用途、および使用環境に対して適切に設計されていることが判明したかどうか、およびこの結論を裏付けるために新しいヒューマン ファクター テストが実施されたかどうかを示す結論から始める必要があります。FDA は、提出者が、評価を実施するための根本的な根拠、および実施されたヒューマン ファクター エンジニアリング プロセスの要約（例：ヒューマン ファクター エンジニアリング分析と評価、デバイスとユーザー インターフェイスの変更と検証テスト）、および結果の分析。

該当する場合、このセクションでは、人的要因の検証テスト後に残っている使用関連のリスクについて説明する必要があります。提出者は、デバイスのベネフィット リスク分析に基づいて、さらなるリスク軽減が実行できない理由を説明する必要があります。

Section 2: Descriptions of intended device users, uses, use environments, and training

This section should include:

- ・ A description of the intended user population. If there is more than one distinct user population, each population should be described. The description should include meaningful differences in capabilities or use responsibilities between user populations that could affect their interactions with the device. This includes lay and healthcare professional users who might use the same device to perform different tasks or different types of professionals who might perform different tasks on the device;
- ・ A summary of the device's intended use;
- ・ A summary of the device's operational context of use and critical aspects of device operation, including:
 - ・ Whether users should or must be trained by a healthcare professional prior to device use;
 - ・ How the device is used across clinical applications; and
 - ・ Set up, maintenance, cleaning, and reprocessing information.
- ・ A summary of the intended use environments (e.g., hospital, medevac vehicle, home use) and the characteristics of those environments (e.g., glare, vibration, ambient 329 noise, high levels of activity) that could affect user interactions with the device; and
- ・ A description of any training users would receive. A sample of the training materials such as a video, presentation slides, or a pamphlet may be appended.

このセクションには、次の内容を含める必要があります。

- ・ **対象とするユーザー集団の説明。** 複数の異なるユーザー集団が存在する場合は、各集団について説明する必要があります。説明には、デバイスとの相互作用に影響を与える可能性のある、ユーザー集団間の機能または使用責任の意味のある違いを含める必要があります。これには、同じデバイスを使用してさまざまなタスクを実

行する一般ユーザーや医療専門家のユーザー、またはデバイスでさまざまなタスクを実行するさまざまな種類の専門家が含まれます。

- ・ **デバイスの使用目的の概要。**
- ・ **以下を含む、デバイスの使用状況とデバイス操作の重要な側面の概要：**
 - ・ デバイスを使用する前に、ユーザーが医療専門家によるトレーニングを受ける必要があるかどうか。
 - ・ 臨床アプリケーション全体でデバイスがどのように使用されるか。 と
 - ・ セットアップ、メンテナンス、クリーニング、および再処理に関する情報。
- ・ **意図された使用環境**（例えば、病院、医療用車両、家庭での使用）の要約、および**ユーザーとデバイスの相互作用に影響を与える可能性のある環境の特徴**（例えば、まぶしさ、振動、周囲の 329 ノイズ、高レベルの活動）。と
- ・ **ユーザーが受けるトレーニングの説明。** ビデオ、プレゼンテーション スライド、パンフレットなどのトレーニング資料のサンプルが添付される場合があります。

Section 3: Description of device-user interface

When applicable, this section should include:

- ・ A graphical representation (e.g., photographs, illustrations, line drawings) of the device and its user interface. This should depict the overall device and all components of the user interface with which the user will interact (e.g., display and function screens, alarm speakers, controls, keypads, dedicated buttons, doors, components to be connected, retaining clips);
- ・ A written description of the device user interface;
- ・ A copy of the labeling that will be provided to the user with the device (e.g., instructions for use, user manual, quick-start guides, packaging);
- ・ An overview of the operational sequence of the device and the user's expected interactions with the user interface. This should include the sequence of user actions performed to use the device and resulting device responses, when appropriate; and
- ・ For modified devices, consider providing information comparing the subject and existing devices (see Table 4 for an example format).

該当する場合、このセクションには以下を含める必要があります。

- ・ デバイスとそのユーザー インターフェイスのグラフィカルな表現（写真、イラスト、線画など）。これは、デバイス全体と、ユーザーが対話するユーザー インターフェイスのすべてのコンポーネントを表す必要があります（例：ディスプレイと機能画面、アラーム スピーカー、コントロール、キーパッド、専用ボタン、ドア、接続されるコンポーネント、保持クリップ）。
- ・ デバイスのユーザー インターフェイスの説明。
- ・ デバイスと共にユーザーに提供されるラベルのコピー（例：使用説明書、ユーザー マニュアル、クイック スタート ガイド、パッケージ）。
- ・ デバイスの操作シーケンスの概要と、ユーザー インターフェイスとのユーザーの予期される対話。これには、デバイスを使用するために実行された一連のユーザー アクションと、必要に応じて結果として得られるデバイスの応答を含める必要があります。 と
- ・ 変更されたデバイスについては、対象と既存のデバイスを比較する情報を提供することを検討してください（フォーマットの例については、表 4 を参照してください）。

Table 4. Example tabular format for the comparison of the modified device user interface to the existing device

Modification description	Image of existing device-user interface component	Image of modified device-user interface component	Description of the modification made to the modified device
Modification #1			
Modification #2			

Section 4: Summary of known use problems

This section should describe all known use problems for previous models of the same device (as applicable) or with similar types of devices (e.g., predicate devices). FDA recommends that submitters state that there are no known use problems, if applicable. For a device that has been modified specifically in response to use problems in the field, this section should discuss those problems and the device modifications.

このセクションでは、同じデバイスの以前のモデル（該当する場合）または同様のタイプのデバイス（述語デバイスなど）の既知の使用上の問題をすべて説明する必要があります。FDAは、提出者が、該当する場合、既知の使用上の問題がないことを述べるよう推奨しています。現場での使用上の問題に対応して具体的に変更されたデバイスの場合、このセクションでは、それらの問題とデバイスの変更について説明する必要があります。

Section 5: Summary of preliminary analyses and evaluations

This section should identify the preliminary analysis and evaluation methods used (e.g., specific analysis techniques, formative evaluations), summarize the key results of those analyses and evaluations, describe modifications made to the user interface design in response, and discuss the key findings that informed the protocol development for the human factors validation test.

このセクションでは、使用された予備的な分析および評価方法（特定の分析手法、形成的評価など）を特定し、それらの分析および評価の主要な結果を要約し、それに応じてユーザー インターフェイスの設計に加えられた変更について説明し、情報を提供した主要な調査結果について説明する必要があります。人的要因検証試験のプロトコル開発。

Section 6: Analysis of hazards and risks associated with use of the device

This section should include the use-related risk analysis document and/or comparative task analysis, as applicable. This is typically an excerpt from the comprehensive risk analysis that contains all use-related hazards and risks identified through the preliminary analyses and evaluations, including those associated with potential use errors. The use-related risk analysis document is intended to be a living document; updates should be made to identified risks and hazards throughout the device design process. FDA believes it can be useful to organize this information in a tabular format. An example tabular format is provided in Table 2. This example provides the recommended minimum information to evaluate the use-related risks associated with your device. For modified devices in HF Submission Category 3, the submitter should provide a comparative task analysis (see example tabular format in Table 3) comparing the modified device use-related risk analysis with the existing device use-related risk analysis.

このセクションには、必要に応じて、使用関連のリスク分析文書および/または比較タスク分析を含める必要があります。これは通常、潜在的な使用エラーに関連するものを含め、予備分析と評価を通じて特定されたすべての使用関連の危険とリスクを含む包括的なリスク分析からの抜粋です。使用関連のリスク分析文書は、生きた文

書であることを意図しています。 デバイスの設計プロセス全体を通じて、特定されたリスクとハザードを更新する必要があります。 FDA は、この情報を表形式で整理すると役立つと考えています。 表形式の例を表 2 に示します。この例は、デバイスに関連する使用関連のリスクを評価するために推奨される最小限の情報を提供します。 **HF 提出カテゴリ 3 の改造されたデバイスの場合、提出者は、修正されたデバイスの使用に関連するリスク分析を既存のデバイスの使用に関連するリスク分析と比較する比較タスク分析 (表 3 の表形式の例を参照) を提供する必要があります。**

If you determine that a device change resulting in a modification to any task, associated harm, and/or risk mitigation measure does not merit new HF validation test data to support the device's use safety, please provide a rationale.

何らかのタスク、関連する害、および/またはリスク軽減手段の変更をもたらすデバイスの変更が、デバイスの使用の安全性をサポートするための**新しい HF 検証テスト データに値しないと判断した場合は、その根拠**を提供してください。

Section 7: Identification and description of critical tasks

This section should:

- Explain the process followed to identify the critical tasks based on the use-related risk analysis document. Since critical tasks are determined by the severity of the potential harm, FDA recommends that the submitter describe the levels of severity being used and use a reference when appropriate. For example, if the submitter is using a qualitative five-level severity rating from a voluntary consensus standard (e.g., ISO 14971), this section should include a table of severity levels with descriptions of each level and reference the applicable standard; and
- List and describe the critical tasks. For HF Submission Category 3, the submitter should provide a separate table highlighting the new critical tasks if relevant and rationale for why the task does not merit new HF validation test data to support the device's use safety. The submitter should also describe each use scenario included in the human factors validation testing and list the critical and non-critical tasks that constitute each use scenario.

このセクションでは、次のことを行う必要があります。

- **使用関連のリスク分析文書に基づいて、重要なタスクを特定するためにたどったプロセスを説明します。** クリティカル タスクは潜在的な危害の深刻度によって決定されるため、FDA は提出者が使用されている深刻度のレベルを説明し、適切な場合は参照を使用することを推奨しています。たとえば、**提出者が任意のコンセンサス規格 (ISO 14971 など) から定性的な 5 レベルの重大度評価を使用している場合、このセクションには重大度レベルの表と各レベルの説明を含め、該当する基準を参照する必要があります。** と
- **重要なタスクを列挙して説明します。** HF 提出カテゴリ 3 の場合、提出者は、関連する場合は新しい重要なタスクと、デバイスの使用の安全性をサポートするための新しい HF 検証テストデータに値しない理由の根拠を強調した別の表を提供する必要があります。 提出者は、人的要因の検証テストに含まれる各使用シナリオについても説明し、各使用シナリオを構成する重要なタスクと重要でないタスクをリストする必要があります。

When modifying an existing device, FDA recommends that submitters compare the new device user interface to their own existing device in their marketing submission. FDA recommends completing this comparison in a tabular format. An example tabular format is provided in Table 4. In addition to the use-related risk analysis document for the entire device, submitters should include a subset of the use-related risk analysis

that isolates tasks and risks associated with the proposed modifications made to the device. FDA recommends including photographic images of the device-user interface components that were modified, including modifications to labeling such as warning statements in an instructional manual. Submitters should list any critical tasks affected by the modification(s). Submitters should also discuss whether the risk associated with the modification is acceptable and assess whether the proposed changes warranted human factors validation testing. As stated in the Human Factors Guidance, the validation test may be limited to assessment of those aspects of users' interactions and tasks that were affected by the design modifications.

既存のデバイスを変更する場合、FDA は、申請者がマーケティング申請で新しいデバイスのユーザー インターフェイスを自分の既存のデバイスと比較することを推奨しています。FDA は、この比較を表形式で完了することを推奨しています。表形式の例を表 4 に示します。デバイス全体の使用関連のリスク分析ドキュメントに加えて、提出者は、デバイスに加えられた提案された変更に関連するタスクとリスクを分離する使用関連のリスク分析のサブセットを含める必要があります。デバイス。FDA は、取扱説明書の警告文などのラベリングの変更を含め、変更されたデバイス ユーザー インターフェイス コンポーネントの写真画像を含めることを推奨しています。提出者は、変更によって影響を受ける重要なタスクをすべてリストする必要があります。提出者は、変更に伴うリスクが許容できるかどうかについても議論し、提案された変更が人的要因の検証テストを正当化するかどうかを評価する必要があります。ヒューマン ファクター ガイダンスに記載されているように、検証テストは、設計の変更によって影響を受けたユーザーの操作とタスクの側面の評価に限定される場合があります。

Section 8: Details of HF validation testing of final design

This section should summarize all HF validation activities conducted. In addition to test results, this section should have a comprehensive analysis of all use errors and problems that occurred that could have resulted in harm in real-world use, a description of all design modifications made to the user interface in response to the test results, and a benefit-risk discussion. A full test protocol and a sample of all scripts and forms used in the testing should be appended. Submitters should provide a residual risk analysis and the rationale for why existing mitigation controls are acceptable. While elimination of all residual risks may not be practicable, submitters should have evidence of a systematic analysis of use errors and mitigations of use-related risks. Submitters should reevaluate risk control and mitigation measures to identify other means to reduce risk when it is determined that the residual risks are unacceptable.

このセクションでは、実施されたすべての HF 検証活動を要約する必要があります。テスト結果に加えて、このセクションには、実際の使用で害を及ぼす可能性のあるすべての使用エラーと発生した問題の包括的な分析、およびテスト結果に応じてユーザー インターフェイスに加えられたすべての設計変更の説明が含まれている必要があります。およびベネフィットとリスクの議論。完全なテスト プロトコルと、テストで使用されたすべてのスクリプトとフォームのサンプルを添付する必要があります。提出者は、残留リスク分析と、既存の緩和制御が受け入れられる理由の根拠を提供する必要があります。すべての残留リスクを排除することは実際的ではないかもしれませんが、提出者は、使用エラーの体系的な分析と使用関連のリスクの軽減の証拠を持っている必要があります。提出者は、残存リスクが容認できないと判断された場合、リスクを軽減する他の手段を特定するために、リスク管理と緩和策を再評価する必要があります。

VI. Examples

The following are hypothetical examples of scenarios intended to illustrate FDA's risk-based approach to determine the HF Submission Category using the flowchart in Figure 1 and its companion text. Based on the HF Submission Category, FDA's recommended HF information to support the marketing submission is

outlined for each scenario. These examples do not account for every submission type nor the human factors information that may be appropriate for every situation. Additionally, the examples describing modifications to an existing device are based on an assumption that a manufacturer has already determined that it needs to submit a new marketing submission. Therefore, these examples are not intended to interpret when a new marketing submission is required. In addition, these examples are not intended to comprehensively represent what should be included in a marketing submission for a new or modification to an existing device.

以下は、図 1 のフローチャートとその付属テキストを使用して HF 提出カテゴリを決定するための FDA のリスクベースのアプローチを説明することを目的としたシナリオの架空の例です。HF 申請カテゴリに基づいて、マーケティング申請をサポートするために FDA が推奨する HF 情報がシナリオごとに概説されています。これらの例は、すべての提出タイプや、すべての状況に適した人的要因の情報を説明しているわけではありません。さらに、既存のデバイスへの変更を説明する例は、メーカーが新しいマーケティング申請を提出する必要があると既に判断しているという前提に基づいています。したがって、これらの例は、新しいマーケティング申請が必要な場合の解釈を意図したものではありません。さらに、これらの例は、新しいデバイスまたは既存のデバイスの変更に関するマーケティング申請に含める必要があるものを包括的に表すことを意図したものではありません。

A Modification to an existing 510(k)-cleared device

Example A.1.

Scenario: A submitter currently has marketing authorization for a gastrointestinal lesion software detection system in a cleared 510(k). The device is a computer-assisted detection device used in conjunction with endoscopy for the detection of abnormal lesions in the gastrointestinal tract. The submitter has proposed to modify the computer-assisted detection algorithm such that a new 510(k) was submitted. The algorithm modifications improve the system's ability to assist in detection of lesions and does not change any aspects of the device-user interface.

Decision Point A: Is it a modification to an existing device?

Yes. The submitter is modifying their own existing 510(k)-cleared device and using that device as the predicate device.

Decision Point B: Is there a change to any of the following:

- User interface;
- Intended device users;
- Intended device uses;
- Intended use environment(s);
- Training; or
- Labeling?

No. The changes to the algorithm do not impact any aspect of the device-user interface. The intended users, uses, and use environments remain the same and in this instance, changes to the algorithm do not include modifications to the labeling or training programs.

Analysis: The recommended HF information in this marketing submission is defined by **HF Submission**

Category 1. The submitter should include a statement justifying that the device modifications do not affect the human factors considerations of the modified device and the conclusion and high level summary of HF evaluation.

Example A.2.

Scenario: A submitter currently has marketing authorization for a gas machine for anesthesia in a cleared stand-alone device 510(k) submission. The gas machine for anesthesia is intended for use in the hospital environment and includes a touch screen graphical user interface (GUI) and control knobs to regulate gas flow. The submitter requests 510(k)-clearance for a modification to the internal gas valving system and included in their 510(k) labeling changes to reflect the modification. There are no changes to the apparent flow settings from this internal change. Any modifications regarding calculated flow rates are made in software settings.

Decision Point A: Is it a modification to an existing device?

Yes. The submitter is modifying their own existing 510(k)-cleared device and using that device as the predicate device.

Decision Point B: Is there a change to any of the following:

- User interface;
- Intended device users;
- Intended device uses;
- Intended use environment(s);
- Training; or
- Labeling?

Yes. The labeling (instructions manual) was changed to describe the modification to the internal gas valving system. This change does not impact any external user interface component on the device itself. There are no changes to the intended device users, uses, intended use environment, or training because there are no such changes to the indications for use.

Decision Point C: Based on the use-related risk analysis, are there:

- New devices only: Critical tasks?
- Modified devices only: New critical tasks introduced or are existing critical tasks impacted?

No. Even though the labeling (instructions manual) has changed, this change does not impact how the intended user is expected to interact with the device because the user is not intended to directly interact with the gas valving system, since it is an internal component. There are no changes that influence the cognitive and/or visual perception or the physical interaction between the user and the device. Therefore, there are no new critical tasks introduced, nor are existing critical tasks impacted.

Analysis: The recommended HF information in this marketing submission is defined by **HF Submission**

Category 2. The submitter should provide a rationale that clearly describes the basis of their decision that there are no new critical tasks introduced, and no impacted critical tasks for their modified device.

Example A.3.

Scenario: In addition to the change described in Example A.2, the submitter also requests 510(k) clearance to change the font size from 12 to 14 point on the text displayed on the graphical user interface (GUI) of the gas machine for anesthesia, along with a proportional increase in the screen's physical size. The submitter is also making associated software changes to address the proposed change in the font size. The GUI menu does not change in terms of selection layout and contains the same icons representing different intended actions.

Decision Point A: Is it a modification to an existing device?

Yes. The submitter is modifying their own existing 510(k)-cleared device and using that device as the predicate device.

Decision Point B: Is there a change to any of the following:

- **User interface;**
- **Intended device users;**
- **Intended device uses;**
- **Intended use environment(s);**
- **Training; or**
- **Labeling?**

Yes. There are changes to the user interface from the software changes because the user is intended to directly interact visually with the words on the touch screen GUI, which the submitter states is the only part of the device being modified. There are no changes to the intended device users, uses, intended use environment, training, or labeling.

Decision Point C: Based on the use-related risk analysis, are there:

- **New devices only: Critical tasks?**
- **Modified devices only: New critical tasks introduced or are existing critical tasks impacted?**

No. Even though the user interface (GUI) was changed to include larger text font and a larger screen display, this change does not impact how the intended user is expected to interact with the device because the same textual information is being presented in the same layout and format. The text size change was assessed to introduce no negative influence on the cognitive and/or visual perception or the physical interaction between the user and the device. In this case, the submitter can choose to provide formative data and/or literature supporting this conclusion. Therefore, there are no new critical tasks introduced, nor are existing critical tasks impacted.

Analysis: The recommended HF information in this marketing submission is **HF Submission Category 2**. The submitter should provide a rationale (e.g., analysis of a literature review for acceptable font size) that clearly

describes the basis of their decision that there are no new critical tasks introduced, and no impacted critical tasks for their modified device.

Example A.4.

Scenario: The submitter requests to change the GUI of the gas machine for anesthesia described in Example A.2. The proposed changes consist of changing textual menu selection items to icons (i.e., graphics). In addition, the submitter requests a change from the physical knob interface with discrete values for gas flow control to a digital slider with continuous values within a pre-specified range that became an added feature to the touch screen GUI. Based on these changes, the submitter updated the labeling, including the user manual and instructions for use, and training.

Decision Point A: Is it a modification to an existing device?

Yes. The submitter is modifying their own existing 510(k)-cleared device and using that device as the predicate device.

Decision Point B: Is there a change to any of the following:

- **User interface;**
- **Intended device users;**
- **Intended device uses;**
- **Intended use environment(s);**
- **Training; or**
- **Labeling?**

Yes. There are changes to the user interface because the user directly interacts visually with the icons and controls on the touch screen GUI. There is also a change in the way the user controls the gas flow. There are no changes to the intended device users, uses, or intended use environment. Both the submitter's training and labeling have changed based on the changes to the touch screen GUI.

Decision Point C: Based on the use-related risk analysis, are there:

- **New devices only: Critical tasks?**
- **Modified devices only: New critical tasks introduced or are existing critical tasks impacted?**

Yes. There are several critical tasks associated with the main touch screen GUI of the gas machine for anesthesia, such as setting the ventilation mode, setting tidal volume and inspiratory pressure, and setting alarms. Changing the GUI to include only icons instead of text for menu selections may impact the ability of the user to comprehend the correct selection. There are also critical tasks associated with setting and controlling the gas flow to the patient. The interface for gas flow control changed from a physical knob to a digital slider on the touch screen interface, which impacts the physical interaction the user might have with the gas flow control. Although the same information is being conveyed, it is displayed in a different layout and format compared to the predicate.

Analysis: This requested change would be considered **HF Submission Category 3**. The submitter should

submit test results and analysis from a new HF validation study for the subject device in an HF Report. The HF Report should include the use-related risk analysis, along with the information referenced in Table 3.

B Modification to an existing PMA approved device

Example B.1.

Scenario: An implantable infusion pump has a physician programmer and both have been approved as a standalone device through the PMA process. The approved physician programmer is a personal digital assistant (PDA) device, with a monochrome screen and physical buttons to control scrolling and menu selection. The submitter requests approval in a PMA Supplement for a modification to the reservoir volume of the infusion pump. This proposed change does not result in any change to medication concentration or dosing calculation. The software is being updated to allow for the proposed volume change. The proposed modifications, including the software changes, have no direct effect on the device with which a physician or patient directly interact.

Decision Point A: Is it a modification to an existing device?

Yes. The submitter is modifying their own existing PMA-approved device.

Decision Point B: Is there a change to any of the following:

- User interface;
- Intended device users;
- Intended device uses;
- Intended use environment(s);
- Training; or
- Labeling?

Yes. The labeling (instructions manual) was updated to specify the change in the reservoir volume.

Decision Point C: Based on the use-related risk analysis, are there:

- New devices only: Critical tasks? ·

Modified devices only: New critical tasks introduced or are existing critical tasks impacted?

No. There are critical tasks that could in some circumstances be impacted by a change in the reservoir volume, including medication concentration and the dosing that are related to drug delivery to the patient. In this case, the medication concentration and dosing remained the same, even with the change in reservoir volume. Therefore, no critical tasks were impacted by the change in reservoir volume.

Analysis: The recommended HF information in this marketing submission is **HF Submission Category 2**. The submitter should provide a rationale (e.g., discussion of how the change in total reservoir volume does not affect critical tasks such as setting concentration or calculating dosage) that clearly describes the basis of their decision that there are no new critical tasks introduced, and no impacted critical tasks for their modified device.

Example B.2.

Scenario: Like 0, an implantable infusion pump has a physician programmer and both have been approved through the PMA process. The approved physician programmer is a PDA device, with a monochrome screen and physical buttons to control scrolling and menu selection. The submitter requests approval in a PMA Supplement for a modification to the physician programmer from the approved monochrome PDA to a mini-tablet computer with a touch screen user interface. The display on the tablet computer will feature a full color display and new icons for menu functions.

Decision Point A: Is it a modification to an existing device?

Yes. The submitter is modifying their own existing PMA-approved device.

Decision Point B: Is there a change to any of the following:

- User interface;
- Intended device users;
- Intended device uses;
- Intended use environment(s);
- Training; or
- Labeling?

Yes. The introduction of new icons, color selection and display, and new menu orientation, has changed the user interface. Due to these changes, the submitter is also proposing to change the relevant training and labeling (instructions manual).

Decision Point C: Based on the use-related risk analysis, are there:

- New devices only: Critical tasks?
- Modified devices only: New critical tasks introduced or are existing critical tasks impacted?

Yes. In this case, the submitter evaluated the existing critical tasks, and some were impacted. Dose calculation function is impacted by additional (new) icon access on new home screen for unit selection and confirmation. Additional steps and workflow with new icon could cause user negative transfer of experience and lead to delay of therapy.

Analysis: The recommended HF information in this marketing submission is **HF Submission Category 3**. The submitter should submit test results and analysis from a new HF validation study for the subject device in an HF Report. The HF Report should include the use-related risk analysis, along with the information referenced in Table 3.

Example B.3.

Scenario: A submitter has an approved PMA for a stent with a balloon catheter delivery system. The submitter is requesting approval for a new stent under a new PMA that has a different stent design and

coating. The new stent uses the same balloon catheter delivery system as the submitter's own PMA-approved stent. The submitter is proposing to leverage the previous HF validation test results for the balloon catheter delivery system.

Decision Point A: Is it a modification to an existing device?

Yes. The submitter is using their own existing PMA-approved balloon catheter delivery system with a new stent.

Decision Point B: Is there a change to any of the following:

- User interface;
- Intended device users;
- Intended device uses;
- Intended use environment(s);
- Training; or
- Labeling?

No. Even though the submitter has submitted a new PMA, in this case, the user-interface of the balloon catheter delivery system is the same as that used in the approved PMA. The only changes to the product are the stent design and coating, which are not user-interfacing and are based on the submitter's approved PMA. The submitter evaluated the critical tasks, and none of them were impacted by the change in stent design and coating. The submitter can leverage the previous HF validation test results in their new PMA.

Analysis: The recommended HF information in this marketing submission is **HF Submission Category 1**. The submitter should include a statement justifying that the device modifications do not affect the human factors considerations of the modified device and the conclusion and high level summary of HF evaluation.

C New devices

Example C.1.

Scenario: In an alternate scenario to Example B.3, the submitter is proposing to introduce the new stent as described above, along with a new balloon catheter delivery system that has a different design from the PMA-approved system.

Decision Point A: Is it a modification to an existing device?

No. The submitter is submitting a new PMA based on a new design of the catheter delivery system with a new stent. The submitter should proceed to Decision Point C.

Decision Point C: Based on the use-related risk analysis, are there:

- New devices only: Critical tasks?
- Modified devices only: New critical tasks introduced or are existing critical tasks impacted?

Yes. The submitter has determined based on the use-related risk analysis that there are critical tasks associated with the subject device.

Analysis: The recommended HF information in this marketing submission is **HF Submission Category 3**. The submitter should submit test results and analysis from a new HF validation study for the subject device in an HF Report. The HF Report should include the use-related risk analysis, along with the information referenced in Table 3.

Example C.2.

Scenario: The submitter submits a 510(k) to request clearance for a new portable fingertip oximeter intended for spot checking oxygen saturation of arterial hemoglobin of adult patients in professional healthcare facilities and the home. This is the first portable oximeter device developed by the submitter. Therefore, the submitter uses a predicate device from a different submitter. The subject device does not include any alarms or additional information interpreting the oxygen saturation, nor is it intended for life supporting or life-sustaining functions. The user of the device places the sensor on a finger and then reads the oxygen saturation values calculated by the device. The submitter compares their device with the predicate device to show the indications for use, use environment, and users are the same between the two devices.

Decision Point A: Is it a modification to an existing device?

No. The submitter has manufactured a new device. For purposes of demonstrating substantial equivalence, the submitter has identified as a predicate a device from another device manufacturer. The submitter should proceed to Decision Point C.

Decision Point C: Based on the use-related risk analysis, are there:

- **New devices only: Critical tasks?**
- **Modified devices only: New critical tasks introduced or are existing critical tasks impacted?**

No. The submitter determined through their use-related risk analysis that the action of placing the sensor on a user's finger and reading the oxygen saturation values could not cause serious harm to the user/patient. The submitter further justifies this conclusion by stating the device is used as a spot-check and there are no alarms or additional information interpreting the results from the device.

Analysis: The recommended HF Submission Category in this marketing submission is **HF Submission Category 2**. The submitter should provide a rationale for why there are no critical tasks.