Expertise and experience

Helping you understand Software as a Medical Device

Updated May 2017
Is my Software a Medical Device?

The first stage is to confirm your product or service is legally classified a SaMD; the product must first have a stated intended purpose that is medical as defined by the Medical Directives. It is sometimes difficult to determine if your software or part (modules) of the software has a medical purpose; for borderline products, you should consult MEDDEV 2.1/6. If software is an accessory to a medical device, MEDDEV 2.1/6 states, “if the software is an accessory to a medical device, it is not a medical device, but it falls under the MDD 93/42/EEC.”

If you are unsure regarding classification, please come and talk with BSI.

The European Commission’s guidance MEDDEV 2.1/6 is only applicable to standalone software which it defines as:

“Software which is not incorporated in a medical device at the time of its placing on the market or its making available.”

As indicated in the MDD, standalone software which has a medical purpose is considered to be an active medical device. Classification depends on the risk to the patient and users. To classify your software fully you will need to review rules 9, 10, 11 and 12 of Annex IX of the MDD and also Annex IX, 2.3: Software which drives a device or influences the use of a device, falls automatically in the same device class.

**AIMD and IVD Directives**

Standalone software shall be classed as an AIMD/IVD or an accessory to an AIMD/IVD provided that it meets the definition contained in the relevant Directive.

What about My App?

Mobile Apps must meet the same requirements outlined, the MHRA has listed words used to describe an App that is likely to be associated with a medical device:

- Amplify
- Analysis
- Interpret
- Alarms
- Calculates
- Controls
- Converts
- Detects
- Diagnose
- Measures
- Monitors

You should also think about the following questions:

Does the software:

- Create medical information
- Modify medical information
- Facilitate perception of medical information
- Facilitate interpretation of medical information

If so it might qualify as a medical device.
Development of Medical Device Software

Before you start to develop your software, identify the relevant directives, standards, and guidance documents recommended to develop, maintain, and validate medical software according to the State of the Art. The diagram below contains the documents you should consider as a starting point. Early consideration of the regulatory requirements will reduce the need to rework your software later in the development cycle.

It is critical you are prepared early in the development process to develop the basic knowledge necessary to evaluate software lifecycle processes and risk management to ensure that they are compliant with the medical directives.

Consider who will use the software, and ensure the user interface is suitable for your target operator; different language and knowledge should be assumed based on the software being used by a patient directly or a clinician.

Regulatory Documents relating to SaMD

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Software Validation

The Directives require employing “State of the Art” methods of software validation, therefore you should stay up to date in the fast paced and ever changing software market.

Software developed by others

The internal software that you develop specifically for your device may need to comply with the medical device directives, but you also need to consider software developed by subcontractors and SOUP (Software Of Unknown Provenance, including off-the-shelf software).

BSI's SaMD experience includes:

- Infusion pump rate setting assistance software
- Radiation therapy planning software
- Apps for phones e.g. ECC ophthalmic assessments
- Standalone software used to program and collect data from implantable devices
- Standalone application software for remotely collecting patient data for clinicians to analyze

Why choose BSI for certification?

Many BSI QMS assessors and client managers are medical device life cycle experts.

Many of our active medical device and IVD instrument assessors and client managers have significant years of experience auditing medical device software for compliance with IEC 62304.

BSI Software Technical Specialists are software life cycle process experts having performed technical visits to client sites and design dossier reviews, assessing any medical devices with software for compliance with the medical device directives for CE marking purposes.

Several of BSI's QMS assessors have TickIT certification (third-party certified through IRCA) and conduct process-based audits taking into account ISO/IEC 90003:2004, Software and System Engineering Guidelines for the application of ISO 9001 to computer software.
Three unique reasons to make BSI your Notified Body

Experience and expertise
BSI focuses on excellence, thereby reducing your corporate risk.

Focus on service
BSI offers a range of review services, giving you a greater level of flexibility as well as predictability.

Market Access
Our efficient review services means your product reviews won’t slow down your launch plans, helping you to stay ahead of the competition.

Talk to BSI
Come and talk to BSI early regarding the regulatory framework and requirements to ensure all factors are taken into account in the early stages of the design process.

Your resource in worldwide compliance: Call BSI today on +44 345 080 9000 or visit: bsigroup.com/medical – to start your journey