

IVDR Conformity Assessment Routes



Contents

3	IVDR Classification Rules under the IVDR	10	Class C Companion Diagnostic (CDx) devices
4	Useful definitions Class A devices	11	Class D with common specifications (Excluding CDx)
5	Class A sterile devices	12	Class D with no Common Specifications (Excluding CDx)
6	Class B (Excluding self-testing NPT devices)	13	Class D CDx devices
7	Class B self-testing and NPT devices	14	How BSI supports your Medical Devices launch CE Excellence
8	Class C (Excluding self-testing NPT and CDx devices)		
9	Class C Self-testing and NPT devices		

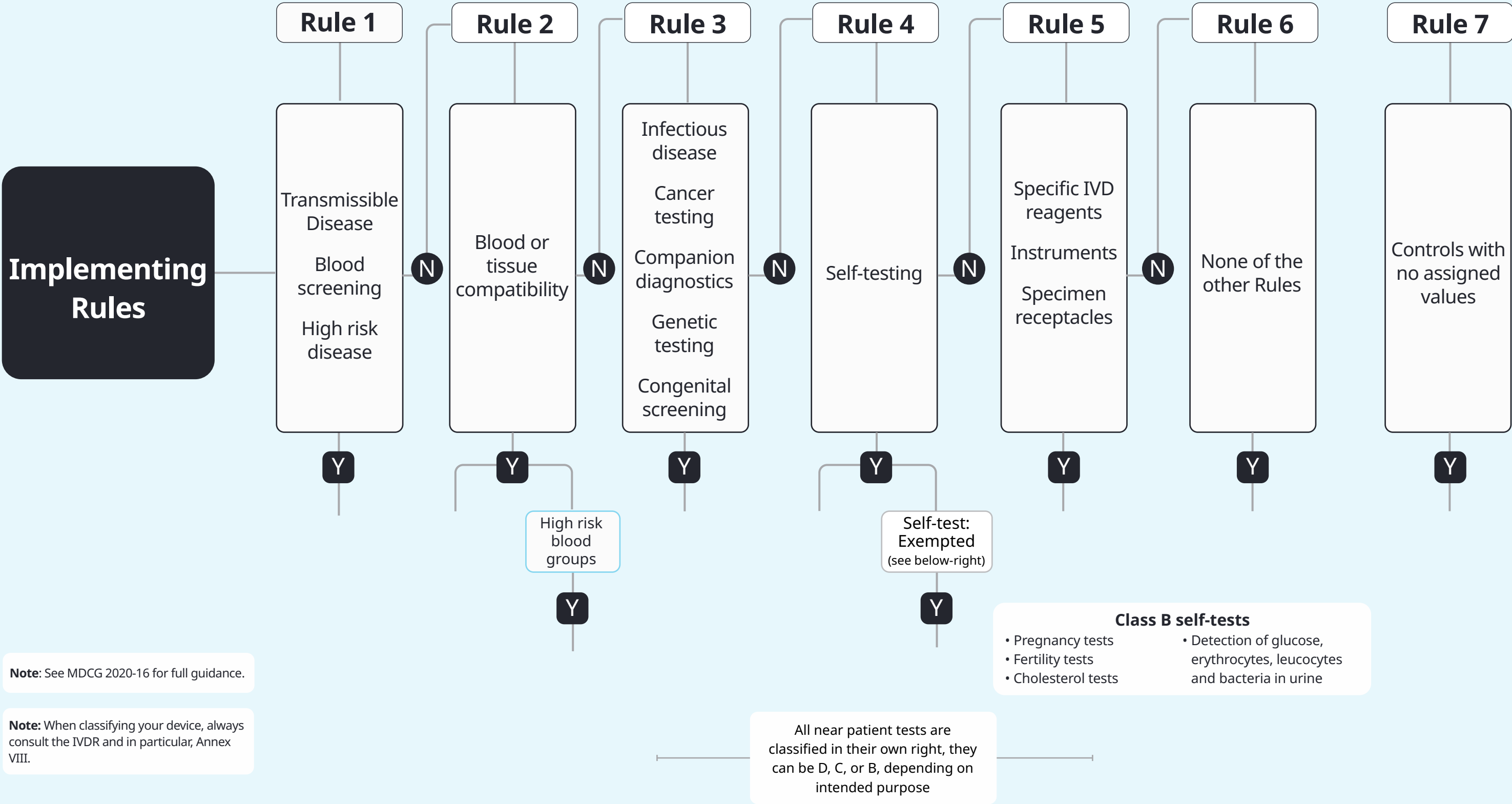
DISCLAIMER:

- The information presented in this brochure is based on our current understanding of the IVDR requirements at the time of publishing and is subject to change.
- The tables do not cover assessments under the conformity route of Annex XI (Production Quality Assurance). BSI is not designated to Annex X (Type Examination).
- The Competent Authority may ask for verification testing by the EU Reference Laboratory for devices other than Class D.

IVD Classification Rules under the IVDR

 Hover over each letter to see the examples

All devices need to be divided into classes, A, B, C, or D, taking into account their their intended purpose and inherent risks.
The Classification map below allows you to allocate your device correctly.
Application of the Classification Rules shall be governed by intended purpose, novelty, complexity and inherent risk of the devices.



Useful definitions

Notified Body (NB)

The role of BSI as a Notified Body is to conduct a conformity assessment under the IVDR. This usually requires an audit of the manufacturer’s quality management system and, depending on the particular classification of the device, a review of the relevant Technical Documentation in support of the safety and performance claims for the device. The Technical Documentation is assessed against the General Safety and Performance Requirements (GSPR) within the IVDR.

CE 2797

Throughout this guide, our Notified Body is referenced using its assigned Notified Body number: BSI The Netherlands (2797).

Common Specifications

The European Commission provides Common Specifications to the IVDR as a means of complying with the legal obligations applicable to a device, process or system, such as the General Safety and Performance Requirements (GSPRs), the requirements for performance studies and performance evaluation, and/or post-market surveillance.

CA and EMA

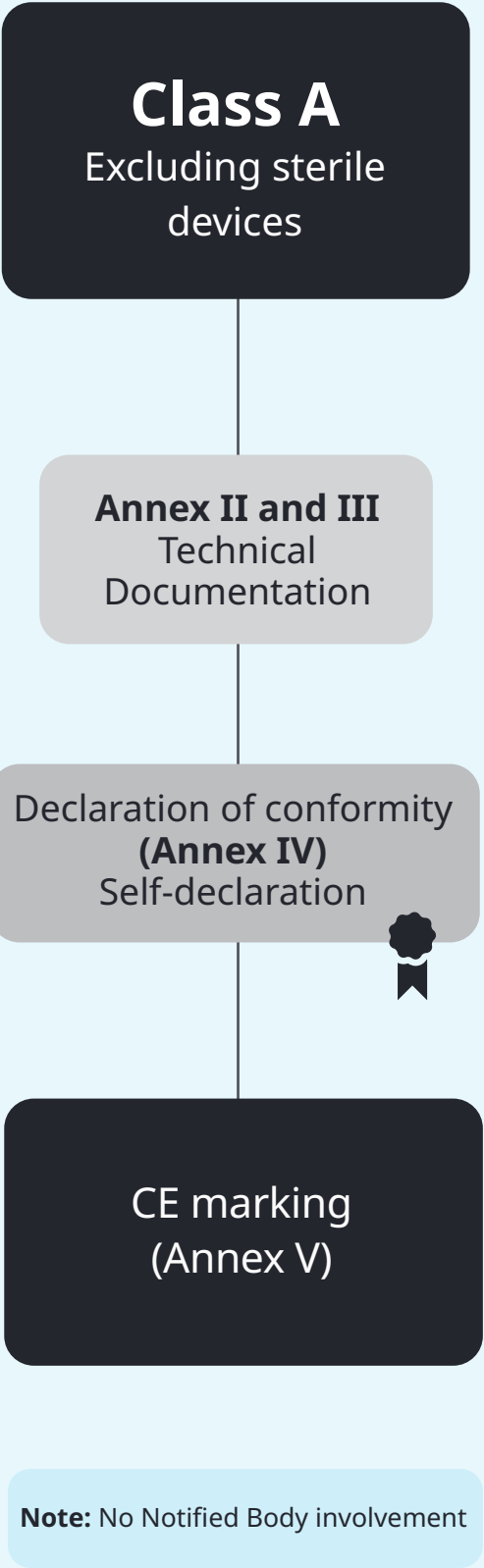
In the case of companion diagnostics, the Competent Authority (CA) or the European Medicines Agency (EMA) will be consulted regarding the associated medicinal product.

EU Reference Laboratory

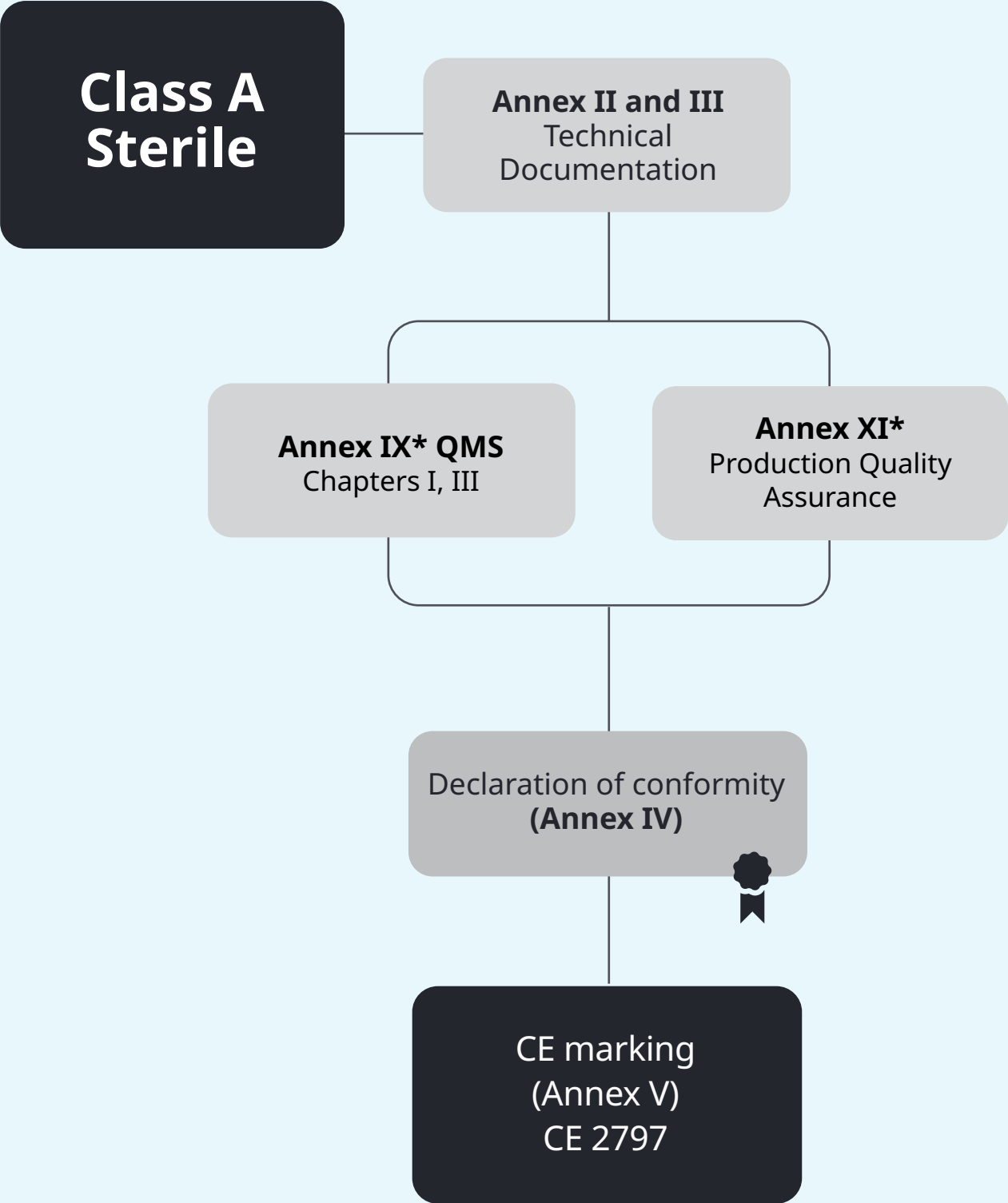
These have been introduced under the IVDR and are laboratories designated by the European Commission to support with the assessment of Class D IVD devices. An EU Reference Laboratory is responsible for verifying the performance of Class D IVD devices and the ongoing verification of manufactured devices.

The Competent Authority may ask for verification testing by the EU Reference Laboratory for devices other than Class D.

Class A devices



Class A sterile devices



* Limited to sterility aspects

Applicable audits, assessments and requirements

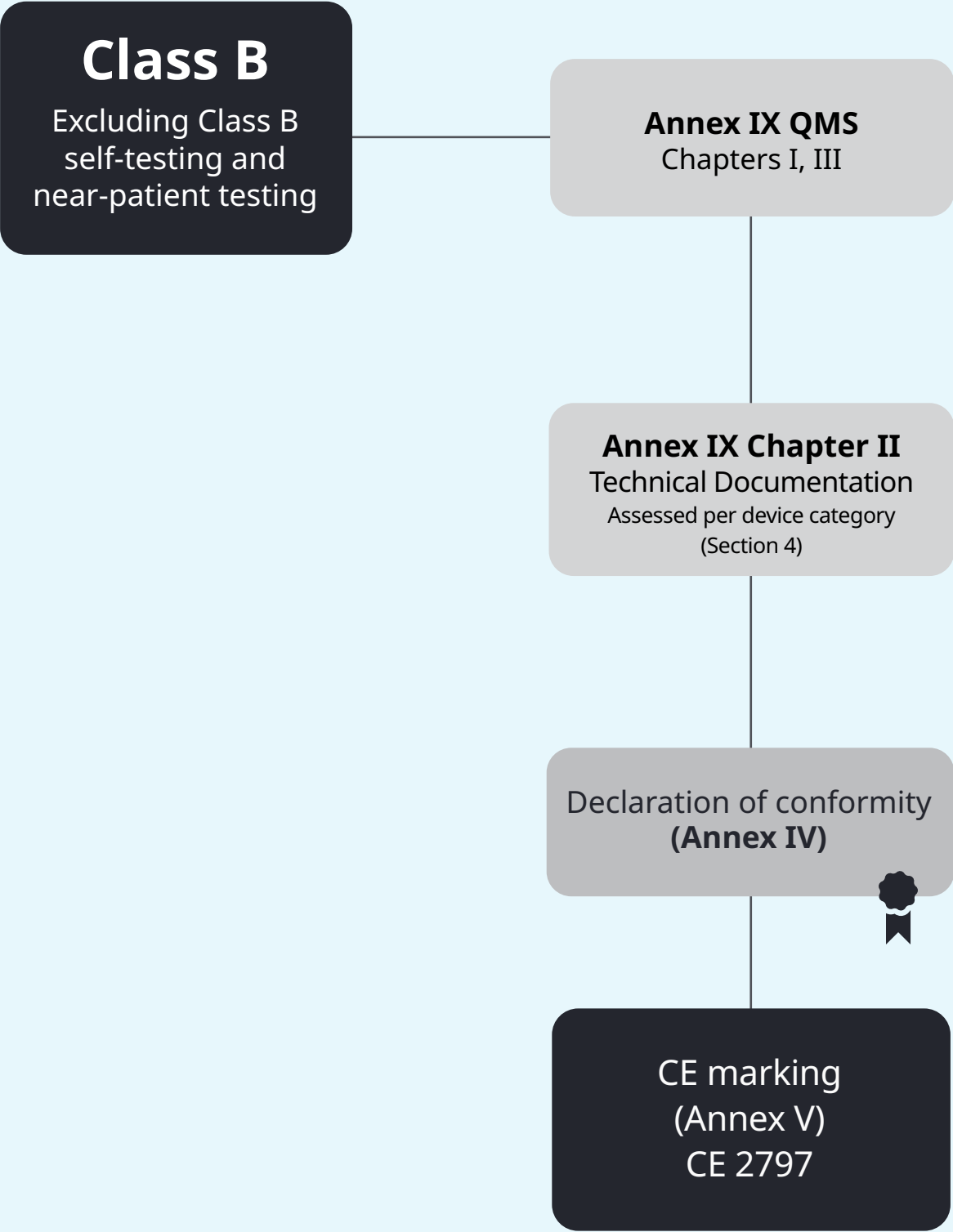
Class A Sterile devices

Class A Sterile devices	Initial Conformity Assessment	Surveillance				
		Y1	Y2	Y3	Y4	Y5
QMS Audits	Yes	Yes	Yes	Recert*	Yes	Yes
Microbiology Audits	Yes	N/A	N/A	Yes	N/A	N/A
Technical Documentation Assessment	No stand-alone Technical Documentation assessment. However, parts of Technical Documentation relevant to sterilization aspects may be audited as part of QMS/Microbiology audits.					
Competent Authority or EMA consultation (Annex IX, Section 5.2)	N/A	N/A	N/A	N/A	N/A	N/A
Experts consultations (Article 48(6))	N/A	N/A	N/A	N/A	N/A	N/A
Verification by EU reference laboratory (Annex IX, section 4.9)	N/A	N/A	N/A	N/A	N/A	N/A
Summary of Safety and Performance (Article 29)	N/A	N/A	N/A	N/A	N/A	N/A
Performance Evaluation Report updates (Annex XIII - Part A, Section 1.3.2 and Article 56)		Not required for NB assessment.				
Post Market Performance Follow-up (PMPF) updates Evaluation Report (Article 56 and Annex XIII, Part B)		Not required for NB assessment.				
Post Market Surveillance (PMS) Report (Article 80)		Updated when necessary and made available to the Notified Body upon request.				
Periodic Safety Update Report (PSUR) (Article 81)		N/A	N/A	N/A	N/A	N/A
Unannounced Audits		At least once every 5 years.				

** The Y3 “Recert” indicated in the table refers to the recertification audit related to EN ISO 13485:2016 certificate cycle which is typically three years. Most manufacturers with MDR/IVDR certificates also hold EN ISO 13485 certificate.

Class B

Excluding self-testing and NPT devices



Applicable audits, assessments and requirements

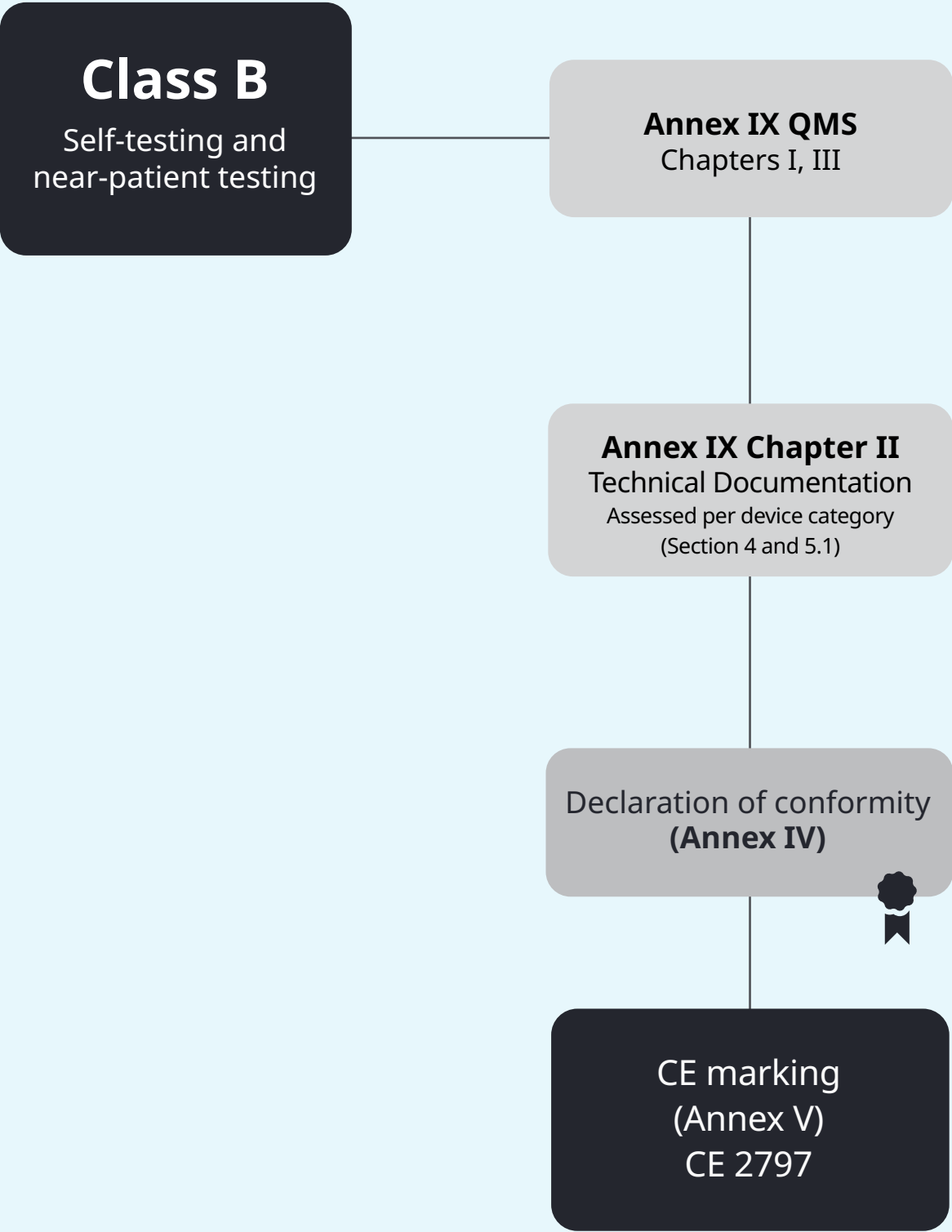
Class B excluding self-testing and NPT devices

Class B Excluding self-testing and NPT devices	Initial Conformity Assessment	Surveillance				
		Y1	Y2	Y3	Y4	Y5
QMS Audits	Yes	Yes	Yes	Recert**	Yes	Yes
Microbiology Audits	Yes*	N/A	N/A	Yes*	N/A	N/A
Technical Documentation Assessment	Sample per device category	At least one Technical Documentation surveillance assessment is required every year. Assessments carried out as per the Technical Documentation Sampling Plan.				
Competent Authority or EMA consultation (Annex IX, Section 5.2)	N/A	N/A	N/A	N/A	N/A	N/A
Experts consultations (article 48(6))	N/A	N/A	N/A	N/A	N/A	N/A
Verification by EU reference laboratory (Annex IX, section 4.9)	N/A	N/A	N/A	N/A	N/A	N/A
Summary of Safety and Performance (Article 29)	N/A	N/A	N/A	N/A	N/A	N/A
Performance Evaluation Report updates (Annex XIII - Part A, Section 1.3.2 and Article 56)		Updated as per manufacturer's Performance Evaluation Plan. Notified Body to review as per Technical Documentation Sampling Plan.				
Post Market Performance Follow-up (PMPF) updates Evaluation Report (Article 56 and Annex XIII, Part B)		Updated as per manufacturer's PMS, PMPF plans. Notified Body to review as per Technical Documentation Sampling Plan. Implementation of the PMPF plan will be verified during annual surveillance visits.				
Post Market Surveillance (PMS) Report (Article 80)		Updated when necessary and provided to the CA and/or Notified Body upon request.				
Periodic Safety Update Report (PSUR)(Article 81)		N/A	N/A	N/A	N/A	N/A
Unannounced Audits		At least once every 5 years.				

* If sterile.

** The Y3 "Recert" indicated in the table refers to the recertification audit related to EN ISO 13485:2016 certificate cycle which is typically three years. Most manufacturers with MDR/IVDR certificates also hold EN ISO 13485 certificate..

Class B self-testing and NPT devices



Applicable audits, assessments and requirements

Class B, self-testing and NPT devices

Class B Self-testing and NPT devices	Initial Conformity Assessment	Surveillance				
		Y1	Y2	Y3	Y4	Y5
QMS Audits	Yes	Yes	Yes	Recert**	Yes	Yes
Microbiology Audits	Yes*	N/A	N/A	Yes*	N/A	N/A
Technical Documentation Assessment	Review for every device	N/A	N/A	N/A	N/A	Recert
Competent Authority or EMA consultation (Annex IX, Section 5.2)	N/A	N/A	N/A	N/A	N/A	N/A
Experts consultations (article 48(6))	N/A	N/A	N/A	N/A	N/A	N/A
Verification by EU reference laboratory (Annex IX, section 4.9)	N/A	N/A	N/A	N/A	N/A	N/A
Summary of Safety and Performance (Article 29)	N/A	N/A	N/A	N/A	N/A	N/A

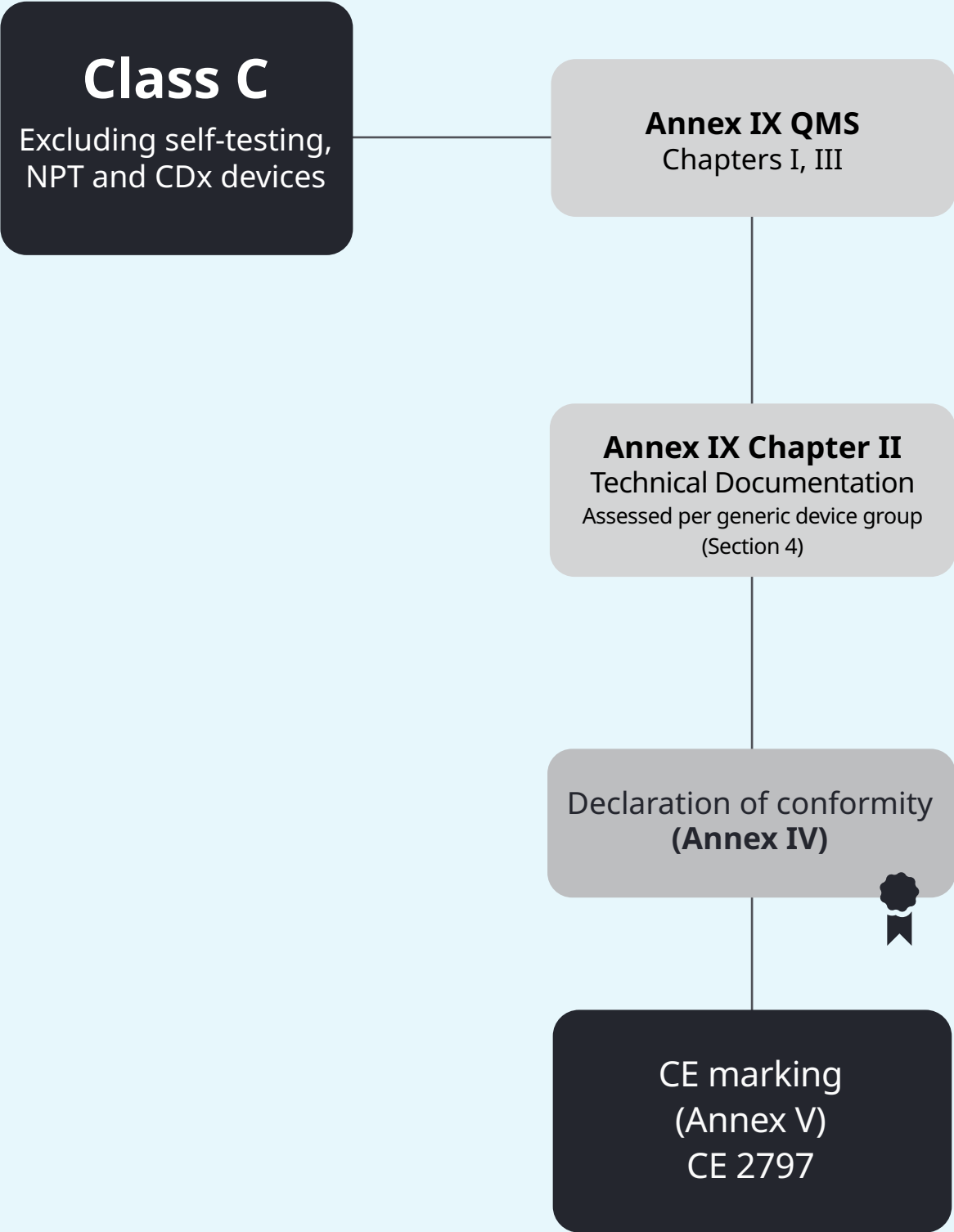
Performance Evaluation Report updates (Annex XIII - Part A, Section 1.3.2 and Article 56)	Updated as per Manufacturer's Performance Evaluation Plan; Notified Body to review at the time of substantial change reviews.				
Post Market Performance Follow-up (PMPF) updates Evaluation Report (Article 56 and Annex XIII, Part B)	Updated as per manufacturer's PMS, PMPF plans. Notified Body to review at the time of substantial change reviews.				
Post Market Surveillance (PMS) Report (Article 80)	Updated when necessary and provided to the CA upon request. Notified Body to review at time of substantial change reviews.				
Periodic Safety Update Report (PSUR) (Article 81)	N/A	N/A	N/A	N/A	N/A
Unannounced Audits	At least once every 5 years.				

* If sterile.

** The Y3 "Recert" indicated in the table refers to the recertification audit related to EN ISO 13485:2016 certificate cycle which is typically three years. Most manufacturers with MDR/IVDR certificates also hold EN ISO 13485 certificate..

Class C devices

Excluding self-testing, NPT and CDx devices



Applicable audits, assessments and requirements

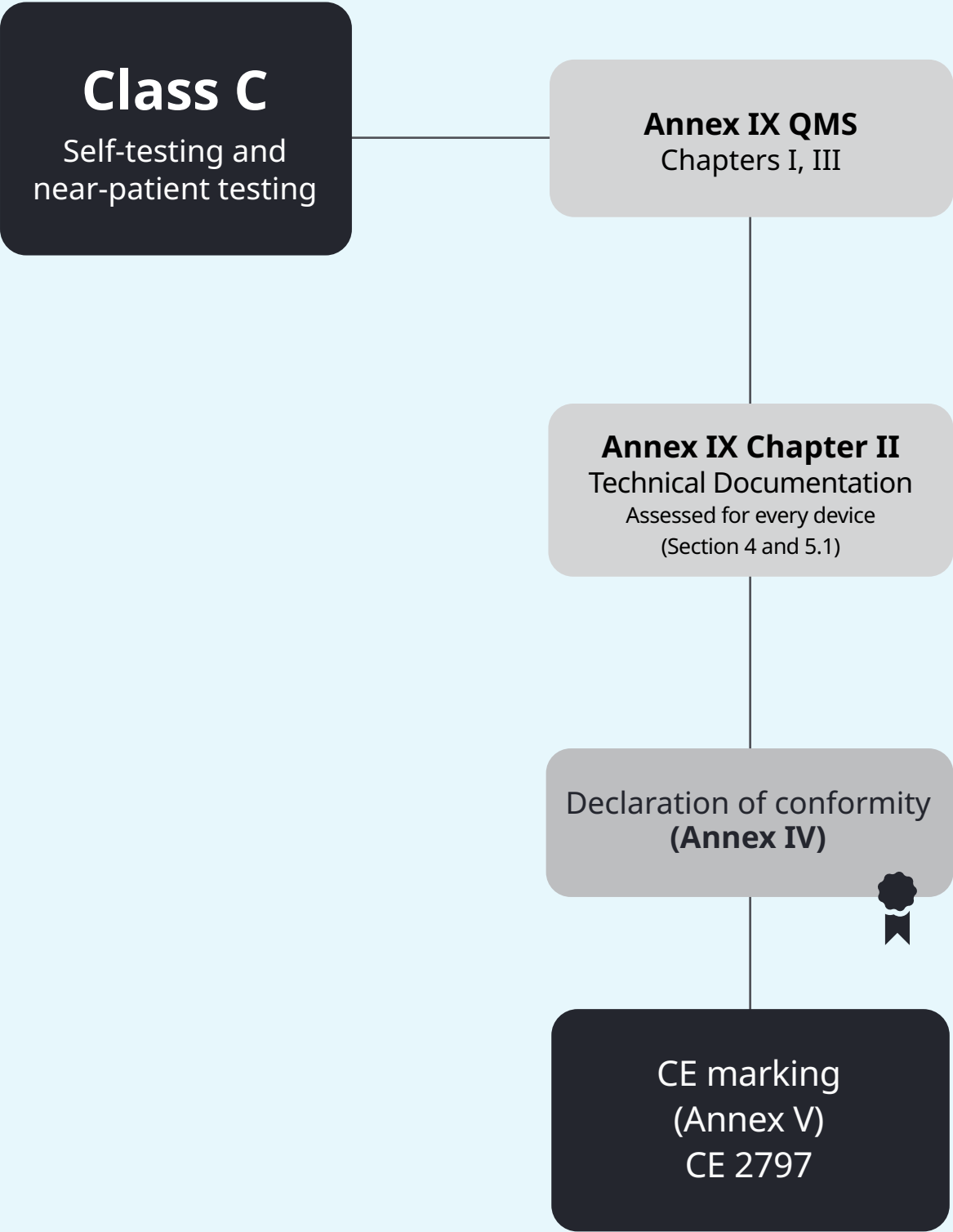
Class C excluding self-testing, NPT and CDx devices

Class C Excluding self-testing, NPT and CDx devices	Initial Conformity Assessment	Surveillance				
		Y1	Y2	Y3	Y4	Y5
QMS Audits	Yes	Yes	Yes	Recert**	Yes	Yes
Microbiology Audits	Yes*	N/A	N/A	Yes*	N/A	N/A
Technical Documentation Assessment	Sample per generic device group	At least one Technical Documentation surveillance assessment is required every year. Assessments carried out as per the Technical Documentation Sampling Plan.				
Competent Authority or EMA consultation (Annex IX, Section 5.2)	N/A	N/A	N/A	N/A	N/A	N/A
Experts consultations (article 48(6))	N/A	N/A	N/A	N/A	N/A	N/A
Verification by EU reference laboratory (Annex IX, section 4.9)	N/A	N/A	N/A	N/A	N/A	N/A
Summary of Safety and Performance (Article 29)	Yes	Updated as soon as possible, where necessary				
Performance Evaluation Report updates (Annex XIII - Part A, Section 1.3.2 and Article 56)		Updated at least annually. Notified Body to review as per Technical Documentation Sampling Plan.				
Post Market Performance Follow-up (PMPF) updates Evaluation Report (Article 56 and Annex XIII, Part B)		Updated as per manufacturer's PMS, PMPF plans. Notified Body to review as per Technical Documentation Sampling Plan. Notified Body QMS audits to verify implementation of the plan by sampling complaints, vigilance information etc.				
Post Market Surveillance (PMS) Report (Article 80)		Post-market surveillance will be captured in the Periodic Safety Update Report.				
Periodic Safety Update Report (PSUR) (Article 81)		PSUR update required at least annually. The PSUR should be available to the Notified Body upon request.				
Unannounced Audits		At least once every 5 years.				

* If sterile.

** The Y3 "Recert" indicated in the table refers to the recertification audit related to EN ISO 13485:2016 certificate cycle which is typically three years. Most manufacturers with MDR/IVDR certificates also hold EN ISO 13485 certificate.

Class C self-testing and NPT devices



Applicable audits, assessments and requirements

Class C self-testing and NPT devices

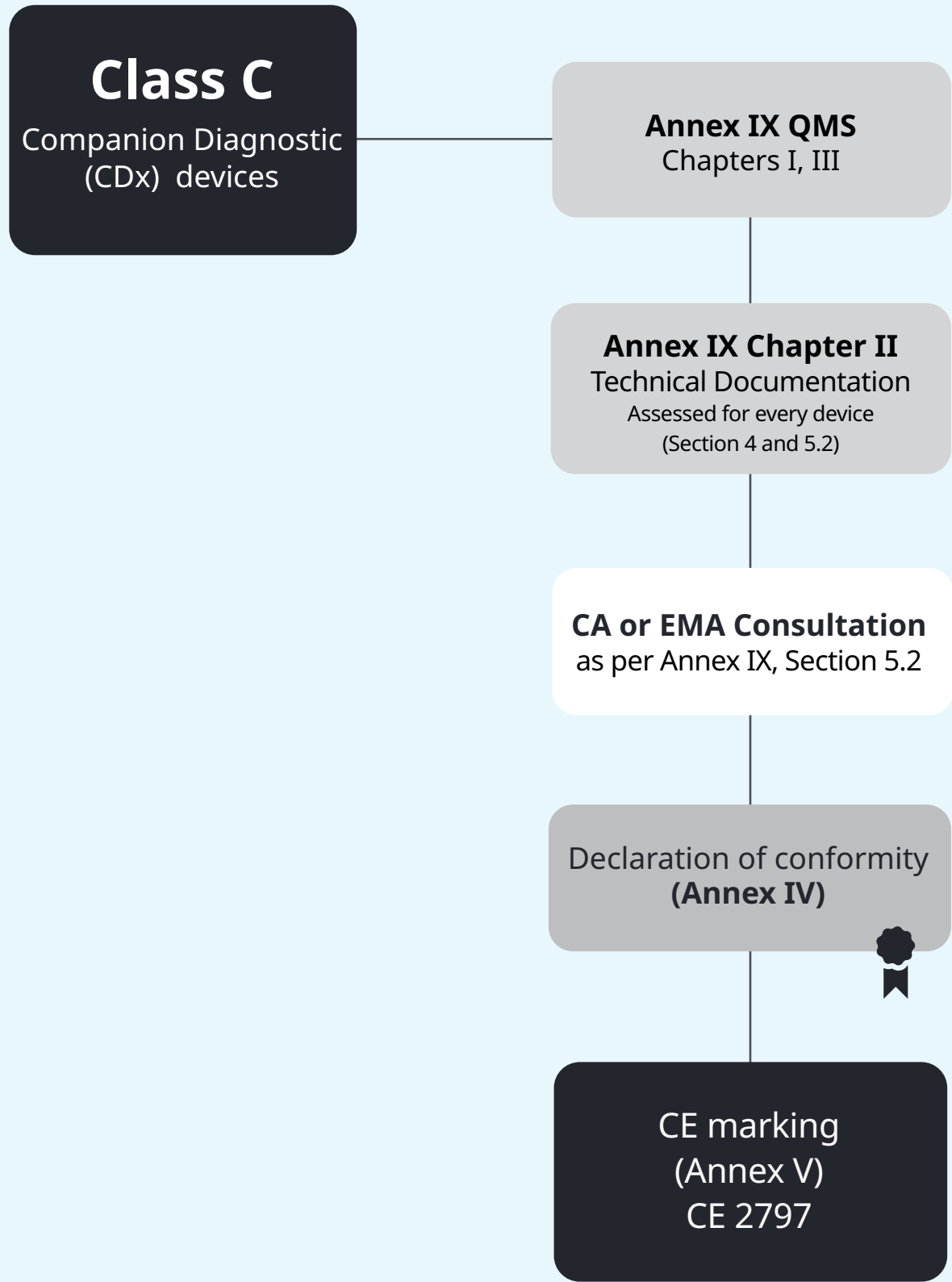
Class C Self-testing and NPT devices	Initial Conformity Assessment	Surveillance				
		Y1	Y2	Y3	Y4	Y5
QMS Audits	Yes	Yes	Yes	Recert**	Yes	Yes
Microbiology Audits	Yes*	N/A	N/A	Yes*	N/A	N/A
Technical Documentation Assessment	Review for every device	N/A	N/A	N/A	N/A	Recert
Competent Authority or EMA consultation (Annex IX, Section 5.2)	N/A	N/A	N/A	N/A	N/A	N/A
Experts consultations (article 48(6))	N/A	N/A	N/A	N/A	N/A	N/A
Verification by EU reference laboratory (Annex IX, section 4.9)	N/A	N/A	N/A	N/A	N/A	N/A
Summary of Safety and Performance (Article 29)	Yes	Updated as soon as possible, where necessary.				

Performance Evaluation Report updates (Annex XIII - Part A, Section 1.3.2 and Article 56)	Updated at least annually. Notified Body to review at the time of PSUR reviews or substantial change reviews.
Post Market Performance Follow-up (PMPF) updates Evaluation Report (Article 56 and Annex XIII, Part B)	Updated as per manufacturer's PMS, PMPF plans. Notified Body to review at the time of PSUR reviews or substantial change reviews.
Post Market Surveillance (PMS) Report (Article 80)	Post-market surveillance will be captured in the Periodic Safety Update Report.
Periodic Safety Update Report (PSUR) (Article 81)	PSUR update required at least annually. The PSUR should be available to the Notified Body upon request.
Unannounced Audits	At least once every 5 years.

* If sterile.

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Class C Companion Diagnostic (CDx) devices



Applicable audits, assessments and requirements

Class C Companion Diagnostic (CDx) devices

Class C Companion Diagnostic (CDx) devices	Initial Conformity Assessment	Surveillance				
		Y1	Y2	Y3	Y4	Y5
QMS Audits	Yes	Yes	Yes	Recert**	Yes	Yes
Microbiology Audits	Yes*	N/A	N/A	Yes*	N/A	N/A
Technical Documentation Assessment	Review for every device	N/A	N/A	N/A	N/A	Recert
Competent Authority or EMA consultation (Annex IX, Section 5.2)	Yes	Modifications to the devices may need supplementary consultations (determined on a case-by-case basis taking into account the nature of the changes proposed).				
Experts consultations (article 48(6))	N/A	N/A	N/A	N/A	N/A	N/A
Verification by EU reference laboratory (Annex IX, section 4.9)	N/A	N/A	N/A	N/A	N/A	N/A
Summary of Safety and Performance (Article 29)	Yes	Updated as soon as possible, where necessary.				

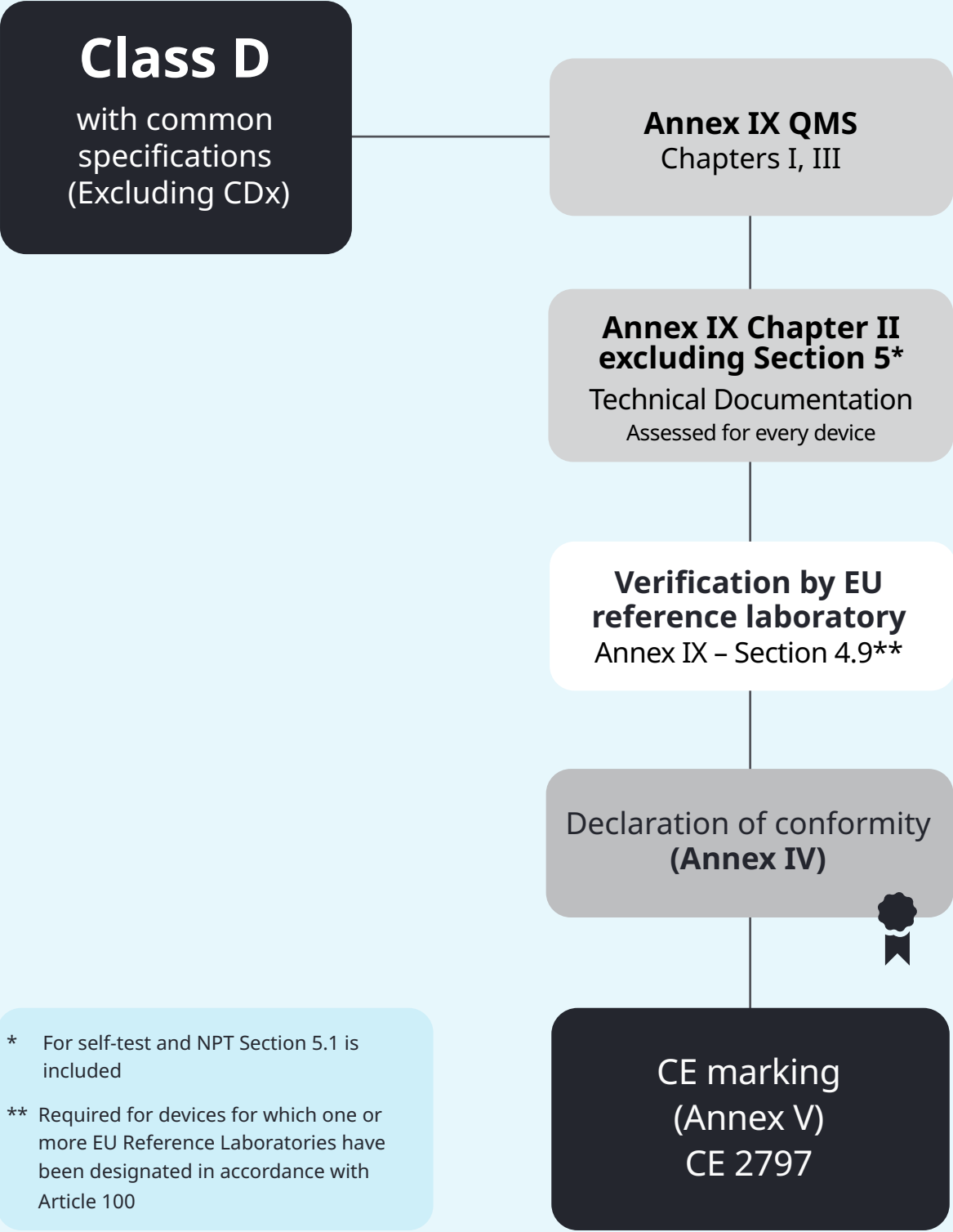
Performance Evaluation Report updates (Annex XIII - Part A, Section 1.3.2 and Article 56)	Updated at least annually. Notified Body to review at the time of PSUR reviews or substantial change reviews.
Post Market Performance Follow-up (PMPF) updates Evaluation Report (Article 56 and Annex XIII, Part B)	Updated as per manufacturer's PMS, PMPF plans. Notified Body to review at the time of PSUR reviews or substantial change reviews.
Post Market Surveillance (PMS) Report (Article 80)	Post-market surveillance will be captured in the Periodic Safety Update Report.
Periodic Safety Update Report (PSUR) (Article 81)	PSUR update required at least annually. The PSUR should be available to the Notified Body upon request.
Unannounced Audits	At least once every 5 years.

* If sterile.

** The Y3 "Recert" indicated in the table refers to the recertification audit related to EN ISO 13485:2016 certificate cycle which is typically three years. Most manufacturers with MDR/IVDR certificates also hold EN ISO 13485 certificate.

Class D with common specifications

(Excluding CDx)



Applicable audits, assessments and requirements

Class D with common specifications

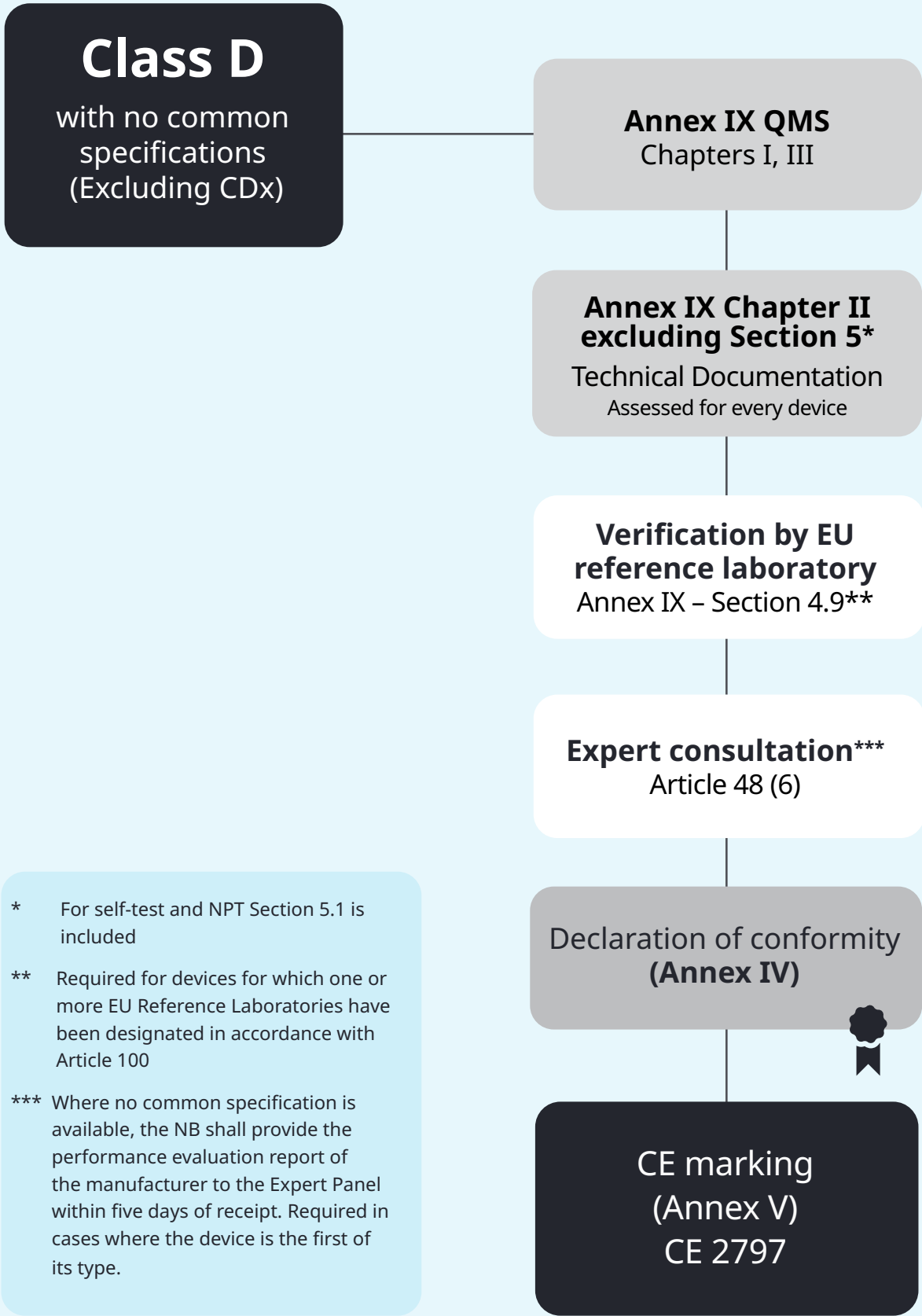
Class D with Common Specification (Excluding CDx)	Initial Conformity Assessment	Surveillance				
		Y1	Y2	Y3	Y4	Y5
QMS Audits	Yes	Yes	Yes	Recert*	Yes	Yes
Microbiology Audits	Yes*	N/A	N/A	Yes*	N/A	N/A
Technical Documentation Assessment	Review for every device	N/A	N/A	N/A	N/A	Recert
Competent Authority or EMA consultation (Annex IX, Section 5.2)	N/A	N/A	N/A	N/A	N/A	N/A
Experts consultations (article 48(6))	N/A	N/A	N/A	N/A	N/A	N/A
Verification by EU reference laboratory (Annex IX, section 4.9)	Yes	Modifications to the devices may need supplementary verifications (determined on a case-by-case basis taking into account the nature of the changes proposed).				
Summary of Safety and Performance (Article 29)	Yes	Updated as soon as possible, where necessary.				
Performance Evaluation Report updates (Annex XIII - Part A, Section 1.3.2 and Article 56)		Updated at least annually. Notified Body to review at the time of PSUR reviews or substantial change reviews.				
Post Market Performance Follow-up (PMPF) updates Evaluation Report (Article 56 and Annex XIII, Part B)		Updated as per manufacturer's PMS, PMPF plans. Notified Body to review at the time of PSUR reviews or substantial change reviews.				
Post Market Surveillance (PMS) Report (Article 80)		Post-market surveillance will be captured in the Periodic Safety Update Report.				
Periodic Safety Update Report (PSUR) (Article 81)		PSUR update required at least annually. Submitted to the Notified Body via EUDAMED for Notified Body review.				
Unannounced Audits		At least once every 5 years.				

* If sterile.

** The Y3 "Recert" indicated in the table refers to the recertification audit related to EN ISO 13485:2016 certificate cycle which is typically three years. Most manufacturers with MDR/IVDR certificates also hold EN ISO 13485 certificate.

Class D with no common specifications

(Excluding CDx)



Applicable audits, assessments and requirements

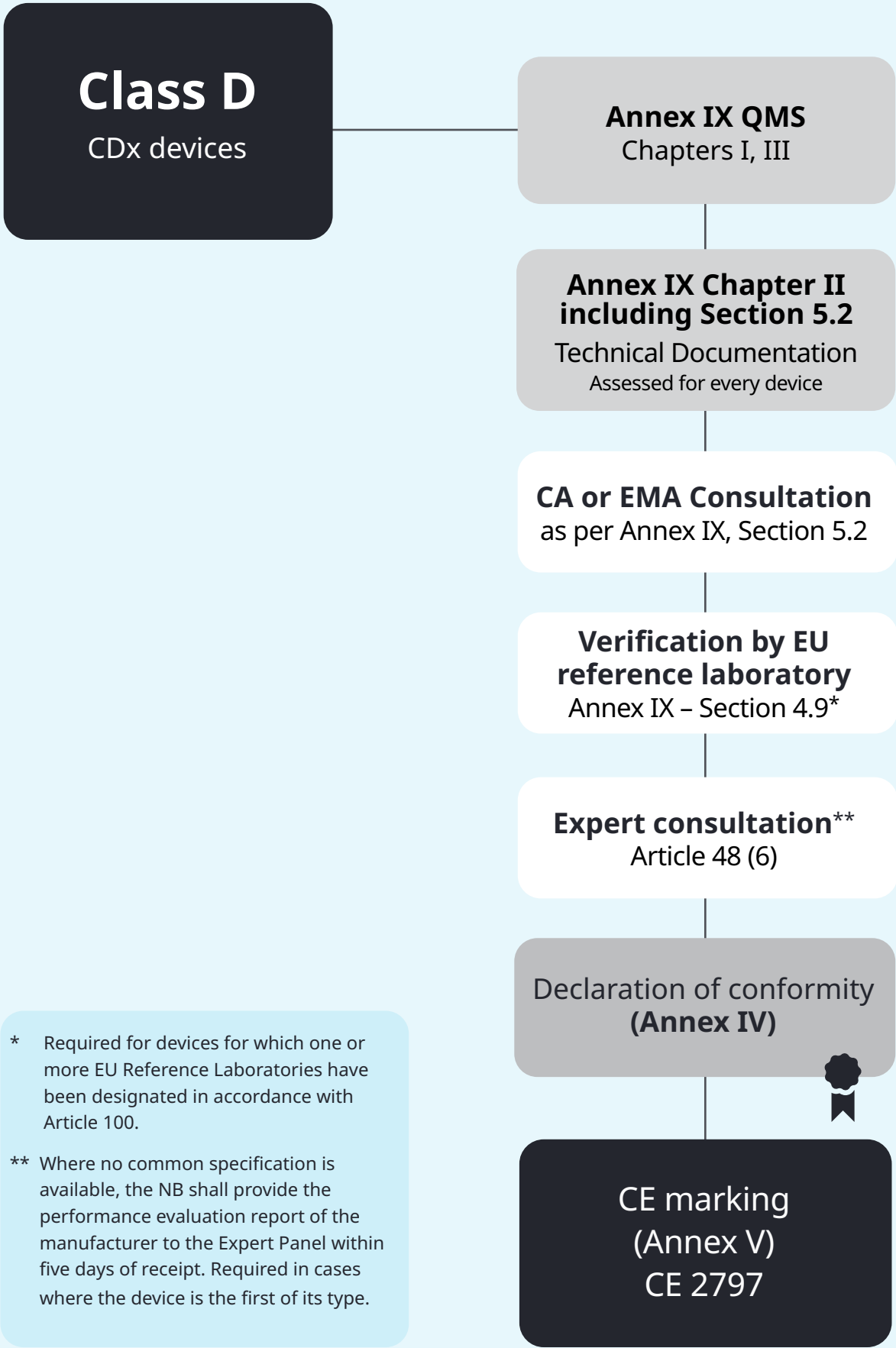
Class D with no common specifications (Excluding CDx)

Class D with no Common Specifications (Excluding CDx)	Initial Conformity Assessment	Surveillance				
		Y1	Y2	Y3	Y4	Y5
QMS Audits	Yes	Yes	Yes	Recert**	Yes	Yes
Microbiology Audits	Yes*	N/A	N/A	Yes*	N/A	N/A
Technical Documentation Assessment	Review for every device	N/A	N/A	N/A	N/A	Recert
Competent Authority or EMA consultation (Annex IX, Section 5.2)	N/A	N/A	N/A	N/A	N/A	N/A
Experts consultations (article 48(6))	Yes if the device is the first of its type	N/A	N/A	N/A	N/A	N/A
Verification by EU reference laboratory (Annex IX, section 4.9)	Yes	Modifications to the devices may need supplementary verifications (determined on a case-by-case basis taking into account the nature of the changes proposed).				
Summary of Safety and Performance (Article 29)	Yes	Updated as soon as possible, where necessary.				
Performance Evaluation Report updates (Annex XIII - Part A, Section 1.3.2 and Article 56)		Updated at least annually. Notified Body to review at the time of PSUR reviews or substantial change reviews.				
Post Market Performance Follow-up (PMPF) updates Evaluation Report (Article 56 and Annex XIII, Part B)		Updated as per manufacturer's PMS, PMPF plans. Notified Body to review at the time of PSUR reviews or substantial change reviews.				
Post Market Surveillance (PMS) Report (Article 80)		Post-market surveillance will be captured in the Periodic Safety Update Report.				
Periodic Safety Update Report (PSUR) (Article 81)		PSUR update required at least annually. Submitted to the Notified Body via EUDAMED for Notified Body review.				
Unannounced Audits		At least once every 5 years.				

* If sterile.

** The Y3 "Recert" indicated in the table refers to the recertification audit related to EN ISO 13485:2016 certificate cycle which is typically three years. Most manufacturers with MDR/IVDR certificates also hold EN ISO 13485 certificate.

Class D CDx devices



Applicable audits, assessments and requirements

Class D CDx devices

Class D CDx devices	Initial Conformity Assessment	Surveillance				
		Y1	Y2	Y3	Y4	Y5
QMS Audits	Yes	Yes	Yes	Recert**	Yes	Yes
Microbiology Audits	Yes*	N/A	N/A	Yes*	N/A	N/A
Technical Documentation Assessment	Review for every device	N/A	N/A	N/A	N/A	Recert
Competent Authority or EMA consultation (Annex IX, Section 5.2)	Yes	Modifications to the devices may need supplementary consultations (determined on a case-by-case basis taking into account the nature of the changes proposed).				
Experts consultations (article 48(6))	Yes, if no CS and the device is the first of its type	N/A	N/A	N/A	N/A	N/A
Verification by EU reference laboratory (Annex IX, section 4.9)	Yes	Modifications to the devices may need supplementary verifications (determined on a case-by-case basis taking into account the nature of the changes proposed).				
Summary of Safety and Performance (Article 29)	Yes	Updated as soon as possible, where necessary.				
Performance Evaluation Report updates (Annex XIII - Part A, Section 1.3.2 and Article 56)		Updated at least annually. Notified Body will provide it to the expert panel as needed. Notified Body to review at the time of PSUR reviews or substantial change reviews.				
Post Market Performance Follow-up (PMPF) updates Evaluation Report (Article 56 and Annex XIII, Part B		Updated as per manufacturer's PMS, PMPF plans. Notified Body to review at the time of PSUR reviews or substantial change reviews.				
Post Market Surveillance (PMS) Report (Article 80)		Post-market surveillance will be captured in the Periodic Safety Update Report.				
Periodic Safety Update Report (PSUR) (Article 81)		PSUR update required at least annually. Submitted to the Notified Body via EUDAMED for Notified Body review.				
Unannounced Audits		At least once every 5 years.				

* If sterile.

** The Y3 "Recert" indicated in the table refers to the recertification audit related to EN ISO 13485:2016 certificate cycle which is typically three years. Most manufacturers with MDR/IVDR certificates also hold EN ISO 13485 certificate.

How BSI supports your Medical Device launch

Readiness

In the competitive medical device marketplace, ensuring that product development meets all regulatory requirements is essential. We support you through the application and certification process.

Worldwide Access

We offer a wide range of regulatory and quality management programs that work cohesively for international compliance. Our Quality Management System (QMS) solutions include ISO 13485, ISO 9001, ISO 14001 and many more.

We are a recognized certification body in Japan, Malaysia, Singapore and Taiwan, and a recognized MDSAP auditing organization for all participating regulatory authorities.

BSI Transfer

We offer a seamless transfer to our services providing comprehensive support to ensure minimal disruption to your company.

Additional Services

- **Access to more than 34,000 standards** and related products, as well as online guidance documents
- **Expert training** online or face-to-face through our public training courses and read our **Excellence Pathways brochure**
- **Regulatory updates and newsletters** focusing on industry changes, helping you to plan for the future
- **Webinars** delivered by our experts on regulatory issues
- **Comprehensive white papers** providing the latest insights on key industry topics



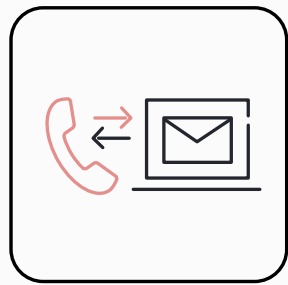
Get in touch

Whether you are starting the certification process, looking to transfer or need to discuss your options, we can guide you through the process.

[Request a quote](#)

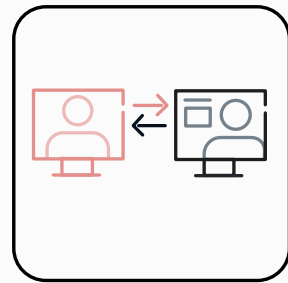
CE-Excellence

BSI CE-Excellence Programs are designed to support manufacturers seeking timely and effective market access. Our services combine efficiency with the integrity, independence, and thoroughness you expect from BSI.



CE-Standard

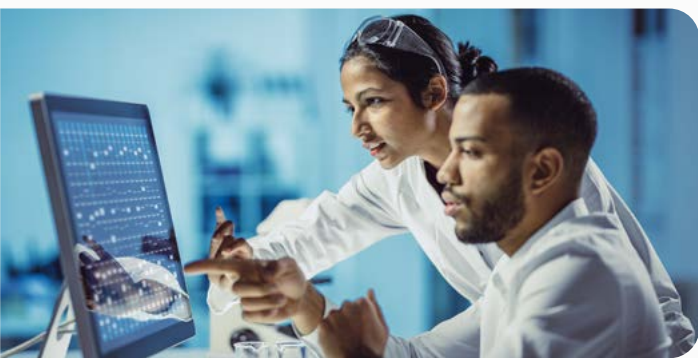
The CE-Standard review service allows you to work closely with your assigned BSI Product Expert on your product certification. These reviews are conducted remotely, with communication between you and your BSI Product Expert via phone and email, as required.



CE-Dedicated

The CE-Dedicated review service allows you to book your technical documentation review in advance. The service is conducted remotely with your BSI Product Expert, who uses the time allocated to your company to conduct a focused review of your technical documentation. This allows you to interact with your BSI product expert, providing them information during the review. The CE-Dedicated service improves the efficiency of the process, and provides predictability in your planning of the review.

For more information on our CE-Excellence services
Call BSI on +44 345 080 9000
or visit our **CE marking webpage**



Note: Our services do not guarantee an EU/UKCA certificate will be issued or that it will be issued within a certain number of working days but they are based on completing the review process with either a positive or negative recommendation. CE and UKCA Dedicated Review service is not available for devices utilizing animal issue derivatives or medicinal substances.



Your partner in progress

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