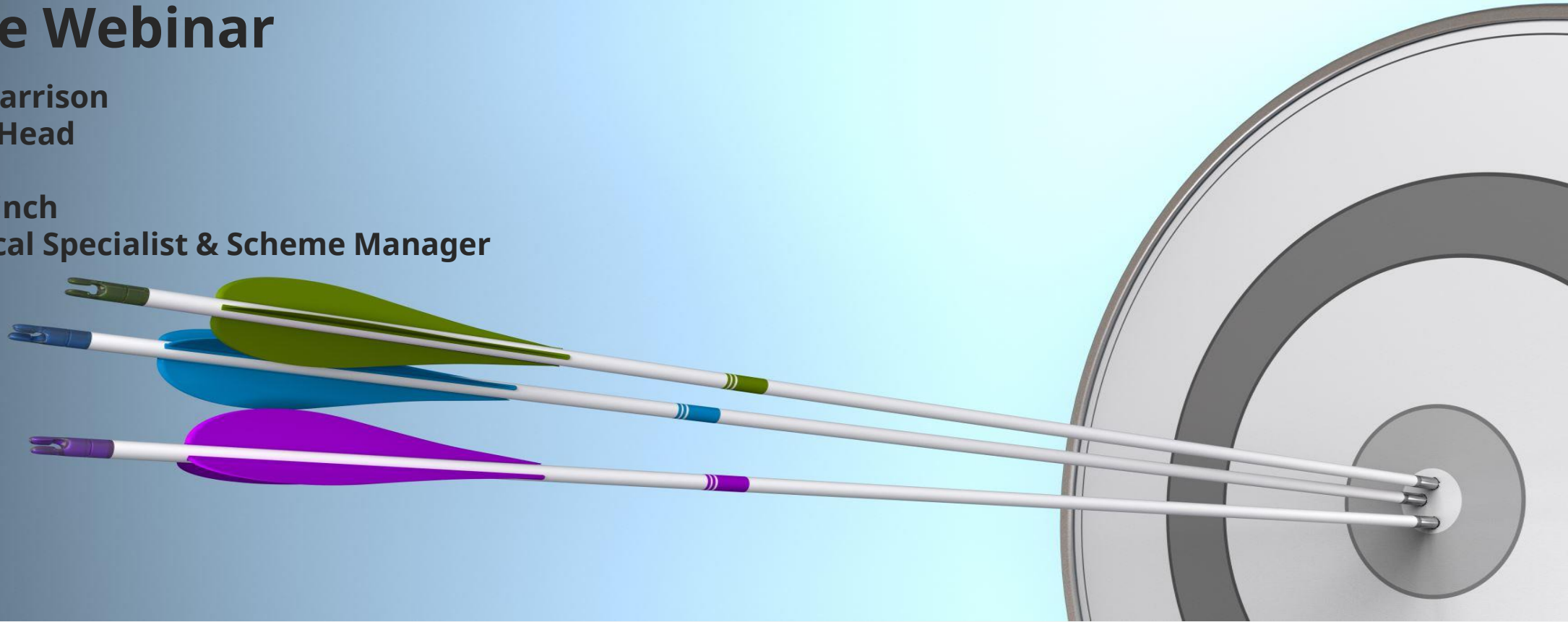




# IVDR Companion Diagnostics (CDx) Update Webinar

Elizabeth Harrison  
IVD Global Head

Elizabeth Linch  
IVD Technical Specialist & Scheme Manager





# BSI IVDR Companion Diagnostic Status

Elizabeth Harrison



**Three companion  
diagnostic IVDR  
certificates  
issued**

### **Four EMA consultations completed with positive opinions**

- PCR based oncology device
- Immunohistochemistry oncology device
- Immunoassay device for markers of prior infection
- FISH based oncology device
  
- Combination of pivotal clinical trial devices and follow-on devices

### **Other IVDR companion diagnostic applications in progress**

- NGS, PCR, IHC, FISH, ISH
- Predominantly oncology devices with a transition deadline of May 2026

IVDR  
Requirements  
for CDx Devices

Conformity  
Assessment  
Process for CDx  
Devices

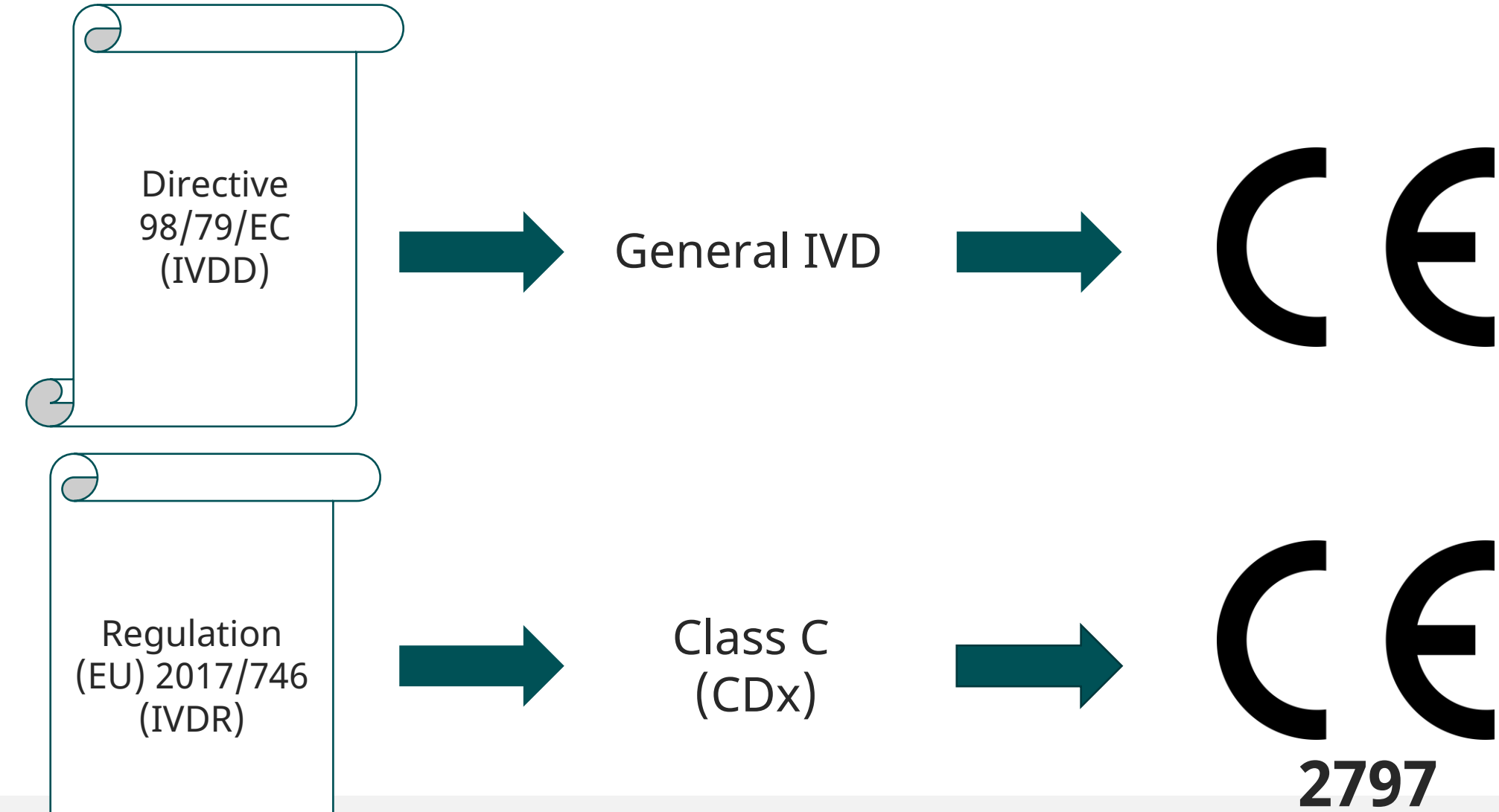
Technical  
Documentation  
Best  
Practices


# IVDR Requirements for CDx Devices

**Elizabeth Linch**



# CDx Regulatory Framework in Europe





**REGULATION (EU)  
2017/746 OF THE  
EUROPEAN PARLIAMENT  
AND OF THE COUNCIL**



## Article 2 - Definitions

(7)

'companion diagnostic' means a device which is **essential** for the safe and effective use of a corresponding **medicinal product** to:

- a) identify, before and/or during treatment, patients who are most likely to **benefit from the corresponding medicinal product**; or
- b) identify, before and/or during treatment, patients likely to be at **increased risk of serious adverse reactions as a result of treatment with the corresponding** medicinal product;

**REGULATION (EU)  
2017/746 OF THE  
EUROPEAN PARLIAMENT  
AND OF THE COUNCIL**



Whereas:

(11)  
Companion diagnostics are **essential** for defining patients' **eligibility** for specific treatment with a **medicinal product** through the **quantitative** or **qualitative** determination of specific markers

Such biomarker or biomarkers can be present in **healthy subjects** and/or in **patients**





## ANNEX VIII – Classification Rules

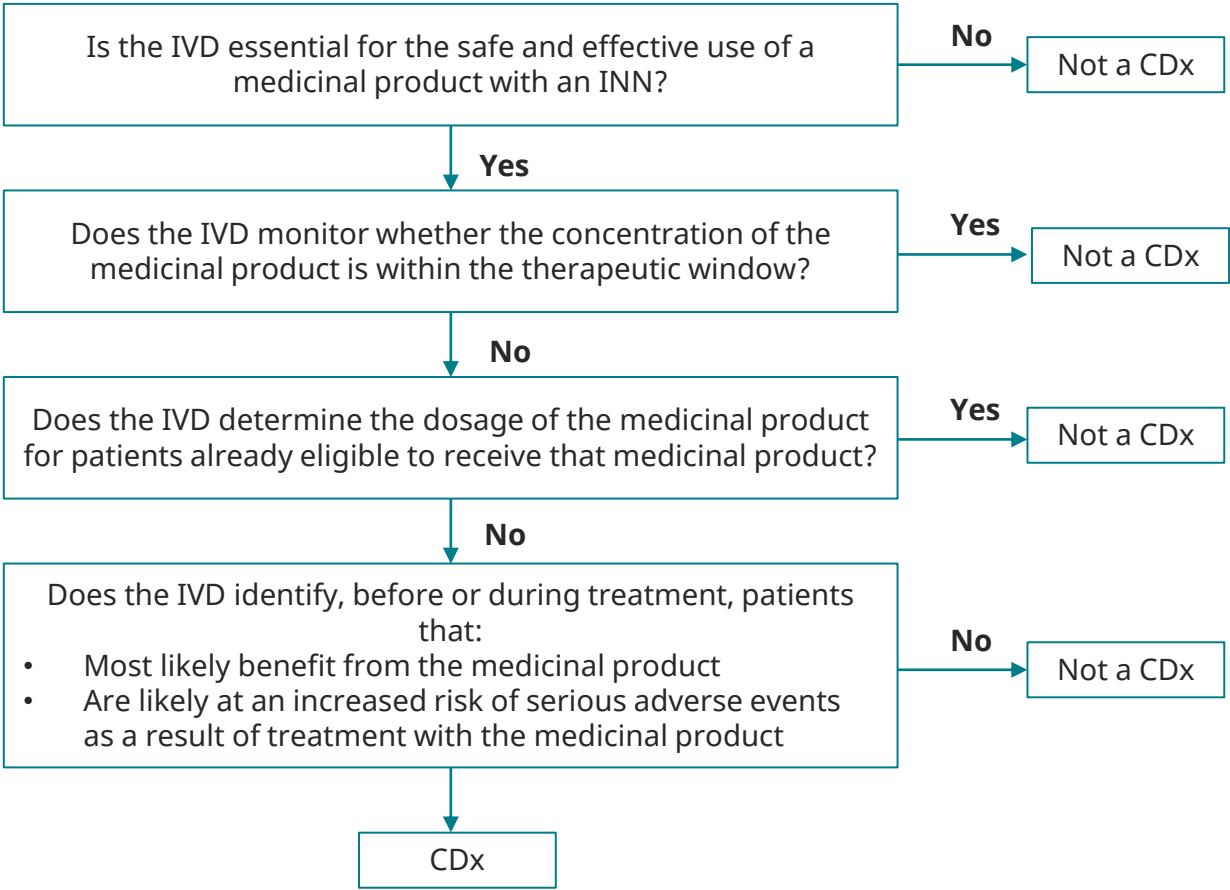
### 2.2. Rule 3

Devices are classified as **C** if they are intended:  
(f) to be used as companion diagnostics

**MDCG 2020-16 (rev.2)**  
**Guidance on**  
**Classification Rules for in**  
**vitro Diagnostic Medical**  
**Devices under**  
**Regulation (EU) 2017/746**



## Annex II: Flowchart to help determine whether an IVD is a CDx



**MDCG 2020-16 (rev.2)**  
**Guidance on**  
**Classification Rules for in**  
**vitro Diagnostic Medical**  
**Devices under**  
**Regulation (EU) 2017/746**



## Section 4 – Explanation of the IVDR Classification Rules

### Devices are not considered to be CDxs:

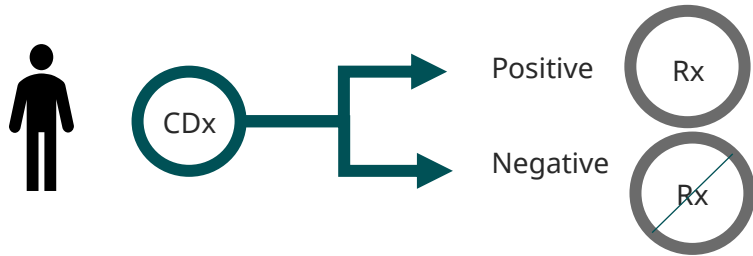
Device that are intended to be used for **monitoring treatment with a medicinal product** to ensure that the concentration of relevant substances in the human body is within the therapeutic window.

Devices intended to determine quantitative or qualitative specific marker(s) to **establish the dosage of a particular medicinal product**, for patients that are **already eligible** to receive that medicinal product.

# Comparison of FDA vs. IVDR Definition of a CDx

## FDA Definition

Device which provides information that is essential for the safe and effective use of a corresponding drug or biological product to:



## IVDR Definition

Device which is essential for the safe and effective of a corresponding medicinal product to:

Identify patients who are most likely to **benefit** from a particular therapeutic product

Identify patients likely to be at **increased risk** for serious side effects as a result of treatment with a particular therapeutic product

Monitor response to treatment with a particular therapeutic product for the purpose of **adjusting treatment** to achieve improved safety or effectiveness.

Identify, before and/or during treatment, patients who are most likely to **benefit** from the corresponding medicinal product

Identify, before and/or during treatment, patients likely to be at **increased risk** of a serious adverse reaction as a result of treatment with a corresponding medicinal product



## Co-developed CDx (aka Original CDx)

Device that is developed in a clinical development program together with the medicinal product.

- Typically, the CDx used in the pivotal clinical trial for the medicinal product.
- Co-development can be in the context of initial marketing authorization or a change in the indication of the medicinal product.



## Follow-on CDx

Device that seeks the same indication in its intended use as the original CDx but was not developed in the clinical development program with the medicinal product.

- Can use a different assay technology than the original CDx.



## Legacy CDx

CDx placed on the market under IVDD.

- Can be a co-developed or follow-on CDx.

# Conformity Assessment Process for CDx Devices





**Technical  
Documentation  
Review**

Annex IX  
Chapter II  
Sections 4 & 5.2

**Competent  
Authority or EMA  
Consultation**

Annex IX  
Chapter II  
Section 5.2

**QMS Audit**

Annex IX,  
Chapters I & III

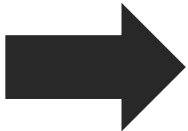


**EU Quality Management System Certificate**

Regulation (EU) 2017/746,  
*Annex IX Chapter I and III*

**EU Technical Documentation Assessment Certificate**

Regulation (EU) 2017/746,  
*Annex IX Chapter II*



**CE**  
**2797**



CE  
2797

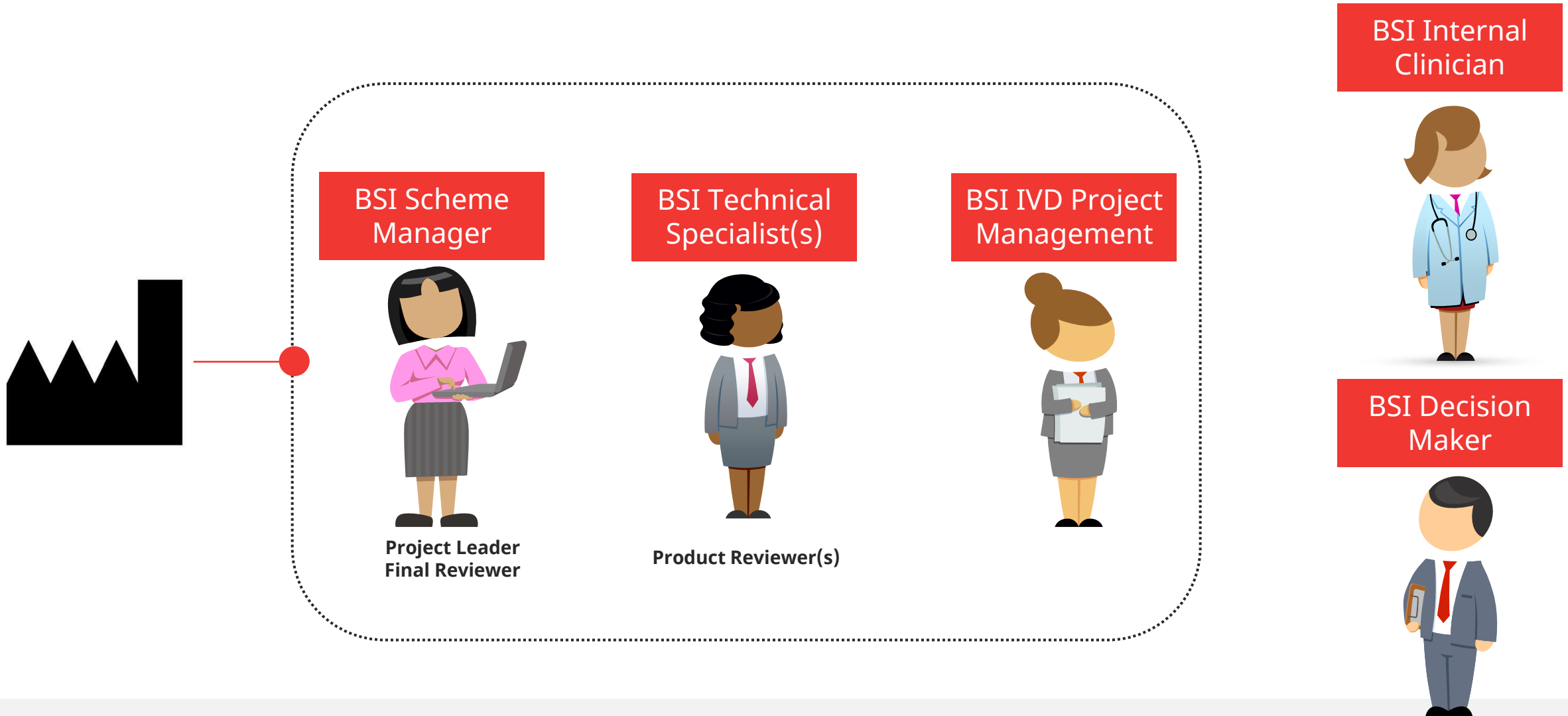


# Technical Documentation Review Process & Best Practices for CDx Devices



# BSI Roles & Responsibilities for Delivering Technical Documentation Reviews

Per IVDR Annex VII & NBOG BPG 2017-2



**Completeness  
Check**

**BSI Technical  
Specialist(s)**



**Consultation**

**Technical  
Documentation  
Review**



**BSI Scheme  
Manager**



**BSI Decision  
Maker**



**TD Review**

**Final Review &  
Decision Making**



BSI Technical Specialist(s)



Completeness Check



Technical Documentation Review



Consultation

BSI Scheme Manager



TD Review

BSI Decision Maker



Final Review & Decision Making



BSI Technical  
Specialist

BSI IVD Project  
Management



## IVDR Documentation Submission

Best Practice Guidelines



bsi.



CE

bsi.

MDF9003  
IVDR Technical Documentation Completeness Check  
Revision No 1 (December 2022)

## IVDR Technical Documentation Completeness Check

Inspiring trust for a more resilient world.

The contents of this document are confidential to BSI Group.  
The definitive version of this document is only available through the BSI BMS

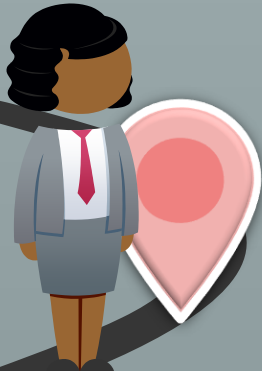
Page 1 of 15

**TD Review**

- Manufacturer assembles technical documentation considering BSI Best Practice Guidelines
- Manufacturer submits the technical file & completed IVDR Technical Documentation Completeness Check Form to BSI
- BSI Technical Specialist verifies completeness of the technical documentation

Completeness  
Check

BSI Technical  
Specialist(s)



Technical  
Documentation  
Review

Consultation

BSI Scheme  
Manager



TD Review

BSI Decision  
Maker



Final Review &  
Decision Making



• Summary of Technical Documentation (STED)

• EU Declaration of Conformity

• Instructions for Use (IFU)

• Summary of Safety and Performance (SSP)

• Performance Evaluation Plan (PEP)

• Scientific Validity Report (SVR)

• Analytical Performance Report (APR)

• Clinical Performance Report (CPR)

• Clinical Performance Study Plan (CPSP)

• Clinical Performance Study Report (CPSR)

• Performance Evaluation Report (PER)

• Post-Market Surveillance Plan

• Risk Management File





IFU

SSP

PEP

SVR

APR

CPR

CPSP

CPSR

PER

PMS

PMPF

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## Reference to previous and similar generations of the device (Annex II, Section 1.2)

- **Technological status of the device:**
  - **Original/Co-developed CDx:**
    - Version of the device was used in the pivotal clinical trial
    - Changes to the device since the pivotal trial and their impact
  - **Follow-on CDx:**
    - Reference to the original CDx
    - The reference device used to demonstrate clinical performance and justification for why is it appropriate
- **Legacy device or new to market?**



## Information in the instructions for use (Annex I – AKA GSPRs, Section 20.4.1)

- **The instructions for use shall contain the following particulars:**
  - The devices intended purpose:
    - Its function = Companion Diagnostic **GSPR 20.4.1 (c)(ii)**
    - The specific information that is intended to be provided = CDx indications & target populations **GSPR 20.4.1 (c)(iii)**
    - International Non-proprietary Name (INN) of associated medicinal product **GSPR 20.4.1 (c)(viii)**
  - The devices analytical & clinical performance characteristics, etc. **GSPR 20.4.1 (w – ab)**
    - Detailed information is expected ⇒ claim, acceptance criteria, materials & methods, statistical methods, results, conclusions

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## Summary of Safety and Performance (Article 29)

- **The SSP shall include:**
  - Reference to previous generation(s) of the device, and description of the differences **Article 29, section 2(e)**
    - Summary of the information provided in the STED
  - Summary of the performance evaluation (including scientific validity, analytical performance, clinical performance, and planned PMPF) **Article 20, section 2(e)**
    - Detailed information is needed for CA or EMA to perform a qualified assessment on the suitability of the device in relation to the concerned medicinal product(s)
- **The MDCG 2022-9 SSP Template shall be used**

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## Performance Evaluation Plan (Annex XIII, section 1.1)

- **The performance evaluation plan shall include...an outline of the different development phases....**
  - **Original/Co-developed CDx:**
    - Alignment of the development phases of the CDx with the clinical development program of the medicinal product(s)
    - Identification of the development phases where scientific validity, analytical, and clinical performance were determined

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## Scientific Validity Report (Annex XIII, section 1.2.1)

### IVDR Definition:

- 'scientific validity of an analyte' means the association of an **analyte** with a **clinical condition** or a physiological state **Article 2(38)**
  - **For CDx Devices:**
    - **Analyte** = CDx biomarker (i.e., BRAF V600E or BRAF V600K mutations in melanoma patients)
    - **Clinical Condition** = response to associated medicinal product (i.e., response to treatment with Mekinist -> INN=trametinib)
- For multiplex devices, scientific validity must be demonstrated for **every CDx biomarker**

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## Scientific Validity Report (Annex XIII, section 1.2.1)

- Mechanism of action for the corresponding medicinal product(s)
- CDx biomarker is established as a predicative biomarker for the associated medicinal product
- Marketing authorization of the corresponding medicinal product(s) in Europe
  - Name of the medicinal product, INN, and Agency Product Number, for example:
    - Name of the Medicinal Product: Mekinist
    - INN: trametinib
    - Agency Product Number: EMEA/H/C/002643
    - Therapeutic indications
  - The approved therapeutic indications of the medicinal product align with the intended purpose of the CDx

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Specialist(s)



## Analytical Performance Report (Annex XIII, section 1.2.2)

### IVDR Definition:

- 'analytical performance' means the ability of a device to correctly detect or measure a particular analyte **Article 2(40)**

### For CDx Devices:

- The analytical performance for the applicable GSPR 9.1(a) characteristics will need to be demonstrated for **all CDx biomarkers** that the device claims to detect
  - i.e., BRAF V600E, BRAF V600K
- Attention will be given to the selection of the assay cut-off since it is of particular importance for the benefit/risk assessment of the medicinal product
- Detailed information on the acceptance criteria, materials & methods, statistical methods, results, conclusions shall be given

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## Clinical Performance Report (Annex XIII, section 1.2.3)

### IVDR Definition:

'clinical performance' means the ability of a device to yield results that are correlated with a particular clinical condition or a physiological or pathological process or state in accordance with the target population and intended user **Article 2(41)**

For a CDx the aim of clinical performance is to:

- Demonstrate that the CDx is able to detect the specified CDx biomarker(s) in patient samples and in the intended use environment
- Demonstrate that the CDx can identify the patient population who is expected to benefit from the corresponding medicinal product(s)

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Specialist(s)





## Clinical Performance Report (Annex XIII, section 1.2.3)

Clinical performance must be demonstrated using one or a combination of the sources specified in IVDR Annex XIII, section 1.2.3

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Specialist(s)



# Approach used to demonstrate clinical performance

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## Clinical Performance Studies

IVDR Annex XIII,  
section 2

## Published Experience Gained by Routine Diagnostic Testing

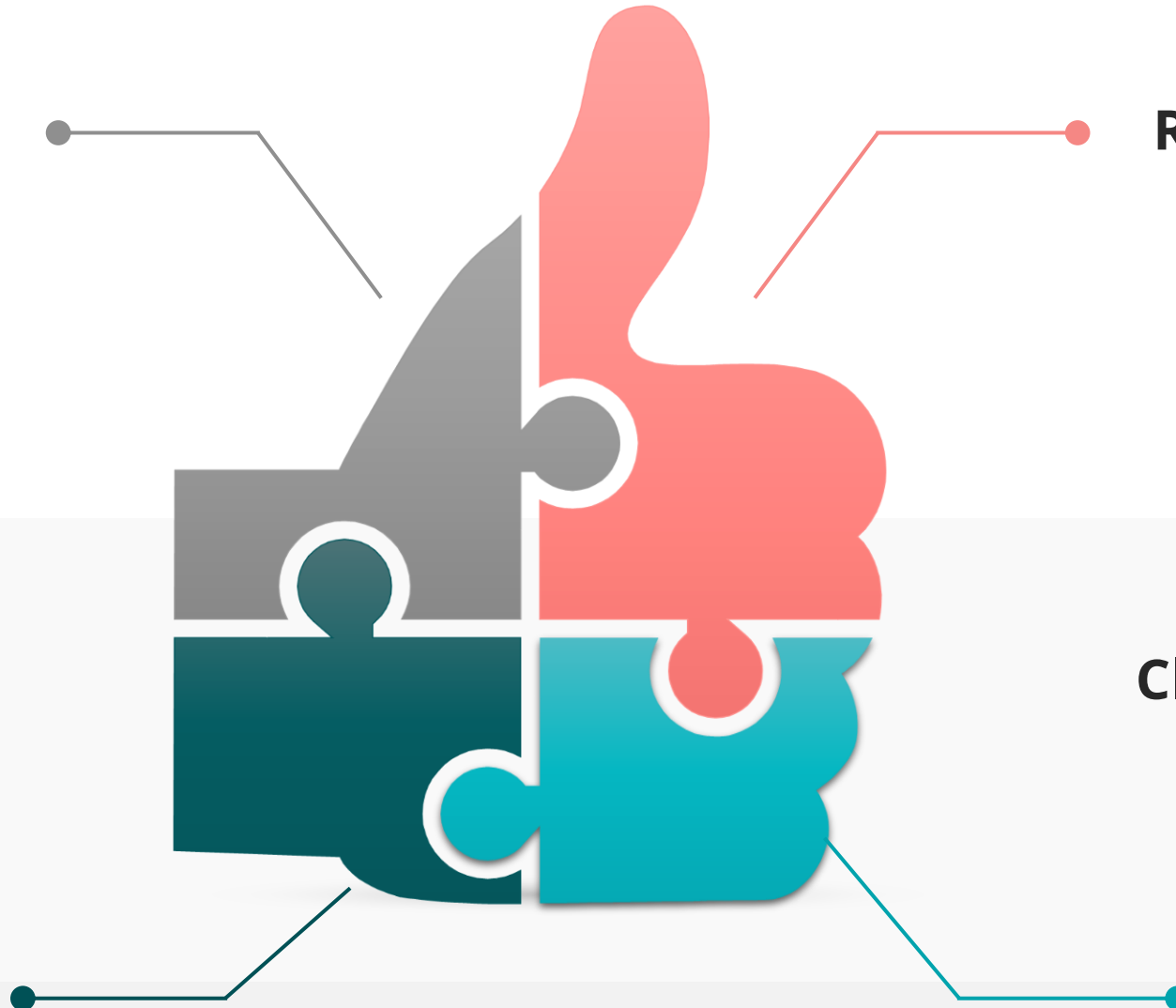
i.e., EQA data

## Scientific Peer Reviewed Literature

Data used to support clinical performance must be generated using the CDx device under review

## Other Sources of Clinical Performance Data

i.e., data from pivotal clinical trial performed before the IVDR



# Approach used to demonstrate clinical performance

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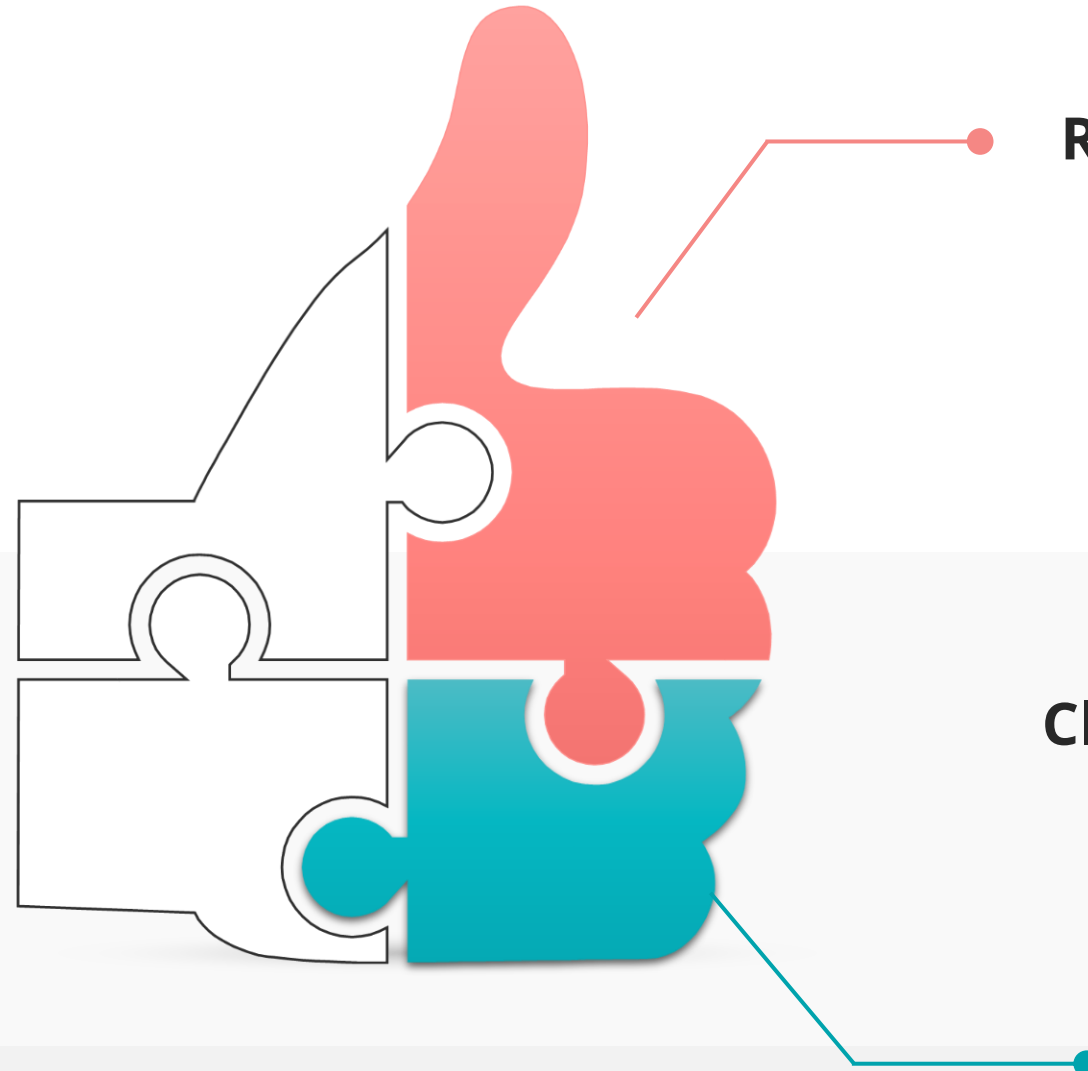


## Other Sources of Clinical Performance Data

i.e., data from pivotal clinical trial performed before the IVDR

# Approach used to demonstrate clinical performance

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## Scientific Peer Reviewed Literature

Data used to support clinical performance must be generated using the CDx device under review

## Other Sources of Clinical Performance Data

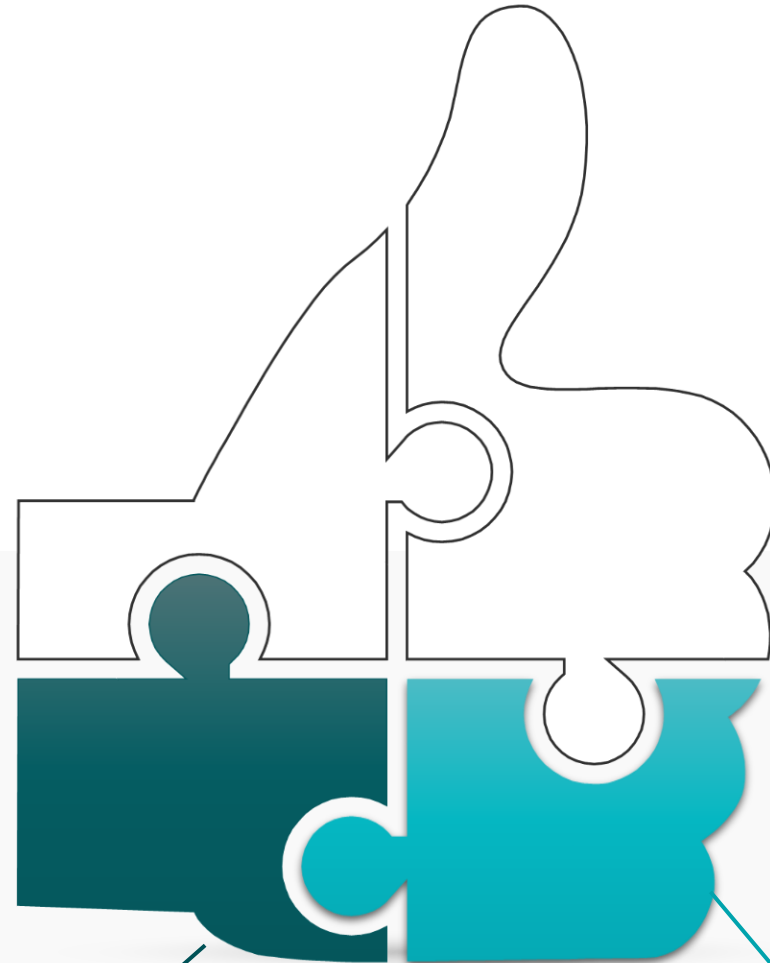
i.e., data from pivotal clinical trial performed before the IVDR

# Approach used to demonstrate clinical performance

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**Published Experience  
Gained by Routine  
Diagnostic Testing**

i.e., EQA data



**Other Sources of  
Clinical Performance  
Data**

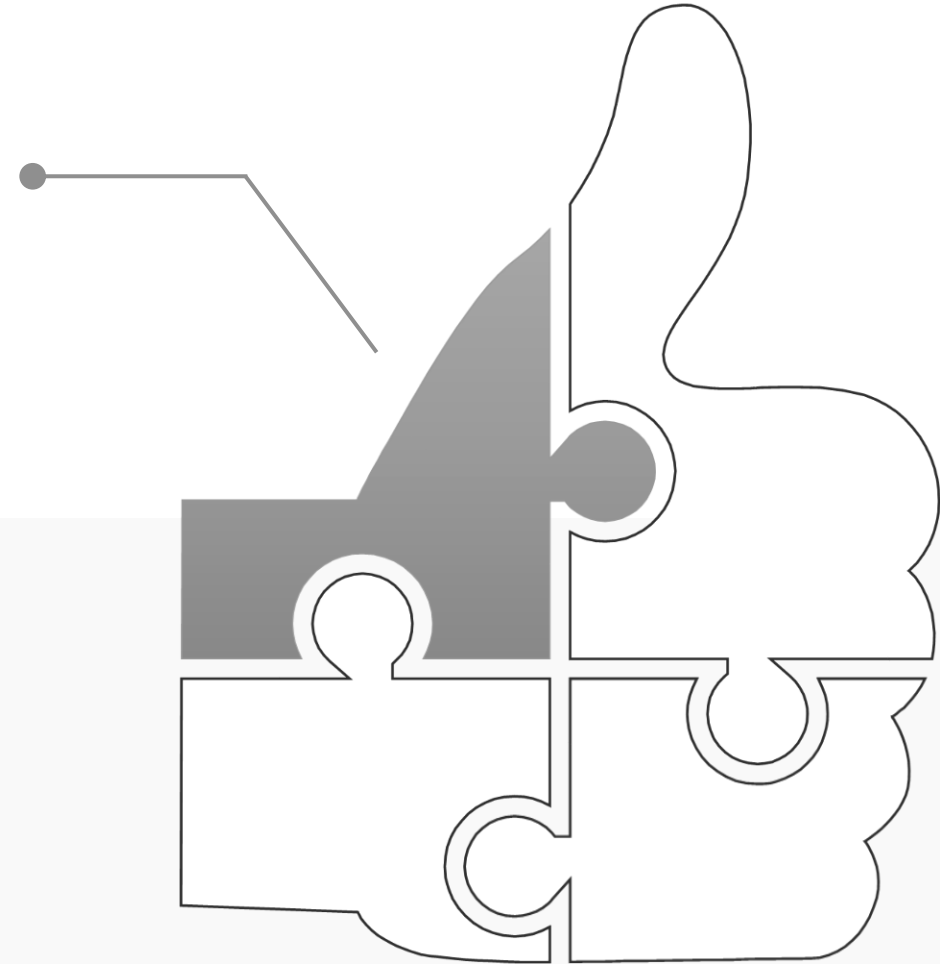
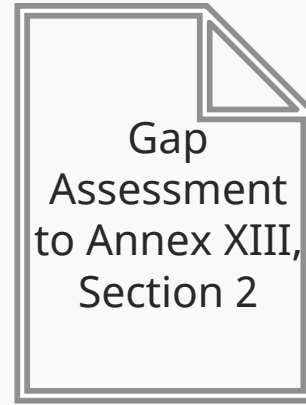
i.e., data from  
pivotal clinical trial  
performed before  
the IVDR

# Approach used to demonstrate clinical performance

---

## Other Sources of Clinical Performance Data Submitted as a Clinical Performance Studies

i.e., data from pivotal clinical trial performed before the IVDR



## Clinical Performance Report (Annex XIII, section 1.2.3)

### Original/Co-developed CDx:

- Clinical performance is demonstrated via the use of the device to select patients for the pivotal clinical trial(s) for the corresponding medicinal product(s)
  - ⇒ Correlation with a clinical endpoint
  - ⇒ Applicable GSPR 9.1(b) clinical performance characteristics depend on the clinical trial design

### Follow-on CDx:

- Clinical performance is demonstrated by a concordance study with a clinically valid reference assay (i.e., the original CDx)
  - ⇒ Applicable GSPR 9.1(b) clinical performance characteristics would include PPA, NPA, OPA

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Specialist(s)



## Clinical Performance Study Plan (Annex XIII, Section 2.3.2)

- The clinical performance study plans corresponding to the clinical performance studies selected to demonstrate the clinical performance of the CDx device shall be provided
- Clinical performance study plans written retrospectively to meet the requirements of the IVDR will not be accepted

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Specialist(s)





## Clinical Performance Study Report (Annex XIII, Section 2.3.3)

- The CPSR corresponding to the clinical performance studies selected to demonstrate the clinical performance of the CDx device shall be provided
- CPSRs written retrospectively to meet the requirements of the IVDR will not be accepted
- CPSRs shall be signed by a medical practitioner or other person responsible
- CPSR ≠ CPR

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## Performance Evaluation Report (Annex XIII, Section 1.3.2)

Documents the manufacturer's assessment of the clinical evidence against the applicable GSPRs and state of the art in medicine in Europe (i.e., medicinal product approval in Europe)

When the medicinal product is not yet approved the end of the CA/EMA consultation will close this loop. Therefore, the PER may need to be updated after the CA/EMA consultation

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## Post-Market Surveillance Plan (Annex III, Section 1)

The PMS plan should also monitor the medicinal product(s)

For example, are there changes to the indications of the medicinal product that impact the conclusion of the benefit-risk analysis for the CDx

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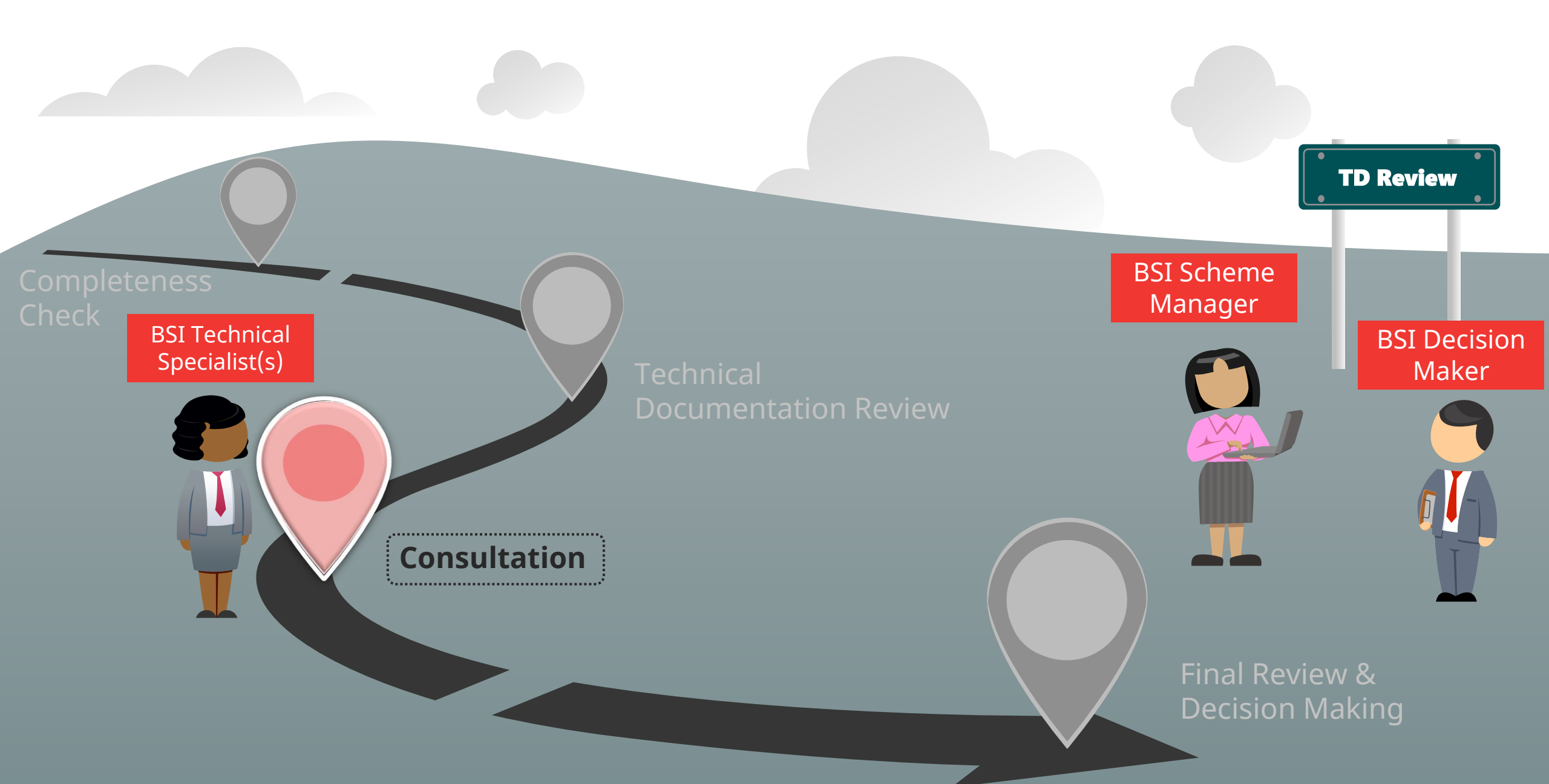
## Post-Market Performance Follow-Up Plan (Annex XIII, Part B)

Are there any outstanding performance or safety issues that need to be addressed via PMPF studies?

Are there any PMPF studies planned to expand the CDx indications and sample types?

BSI Technical Specialist(s)





# Competent Authority or EMA Consultation



# Consultation

BSI consults the authority that approved the medicinal product



## Centralised Procedure

- Single marketing authorisation for EU via EMA



## National Authorisation Procedure

- Individual Member States authorize medicines for use in their own territory



# Centralised Marketing Authorisation via EMA

Allows companies to submit a single application to EMA to obtain a centralised marketing authorization from the European Commission

- Centralised marketing authorization is valid in EU member states, Iceland, Liechtenstein and Norway
- EMA performs assessment of medicinal product and makes recommendation for marketing authorization to the EU Commission
- EU Commission grants marketing authorization based on EMA's recommendation



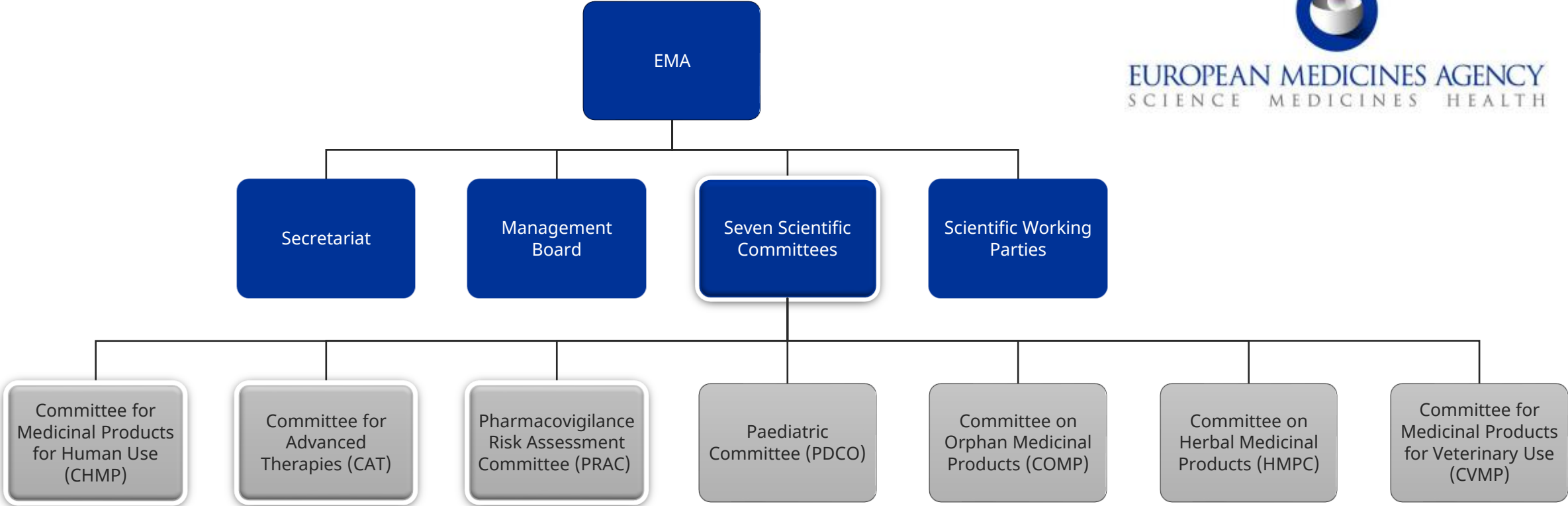


# European Medicines Agency (EMA)

Agency in the EU in charge for evaluation and supervision of medicinal products

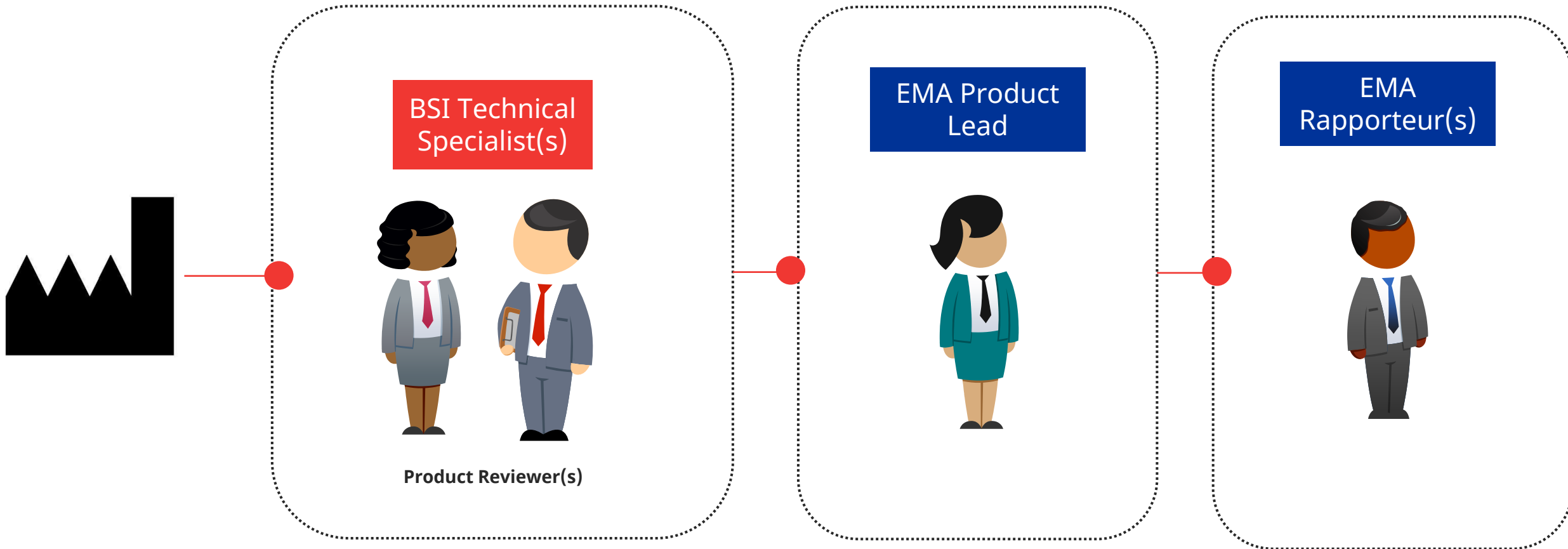


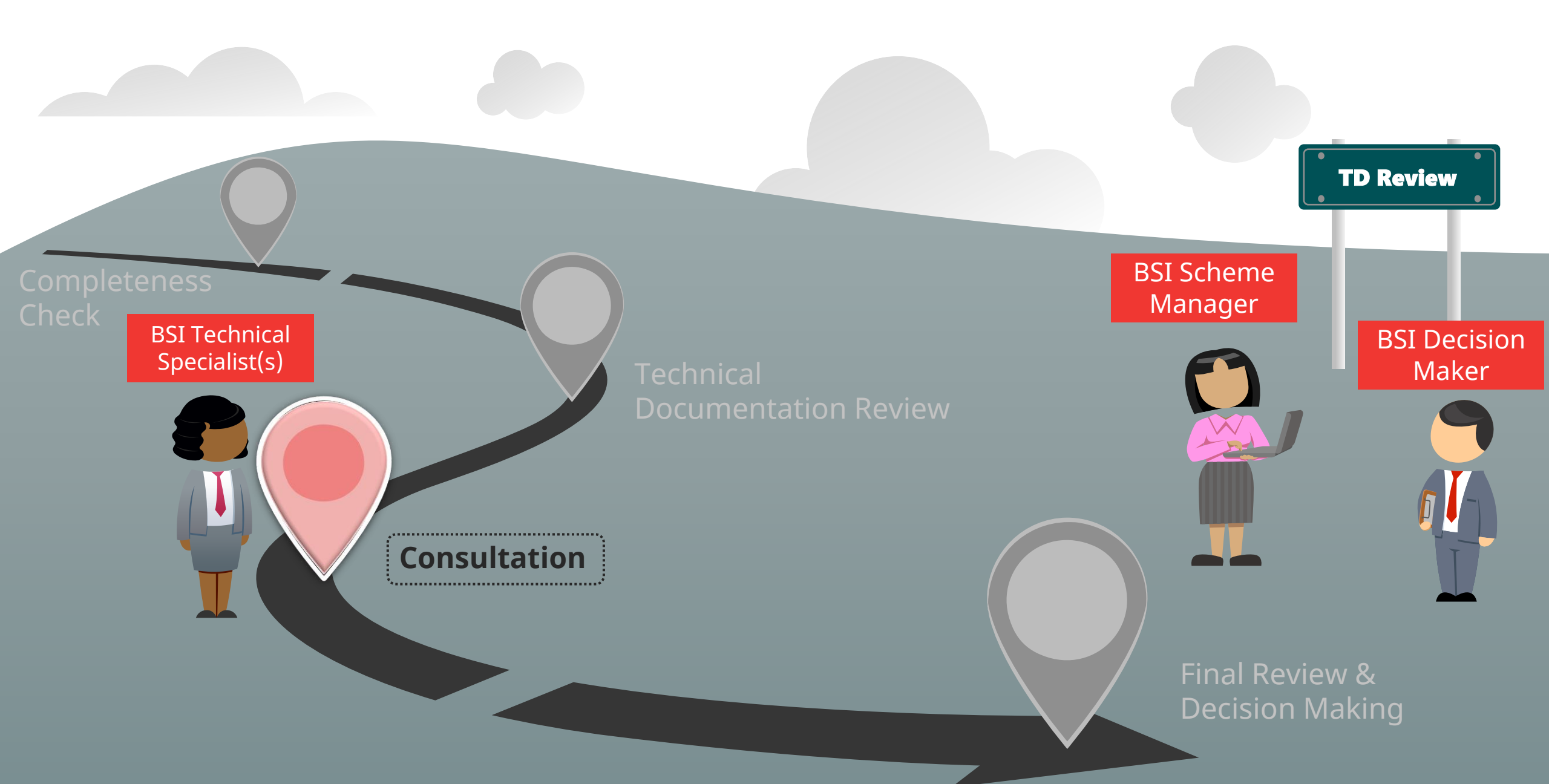
EUROPEAN MEDICINES AGENCY  
SCIENCE MEDICINES HEALTH

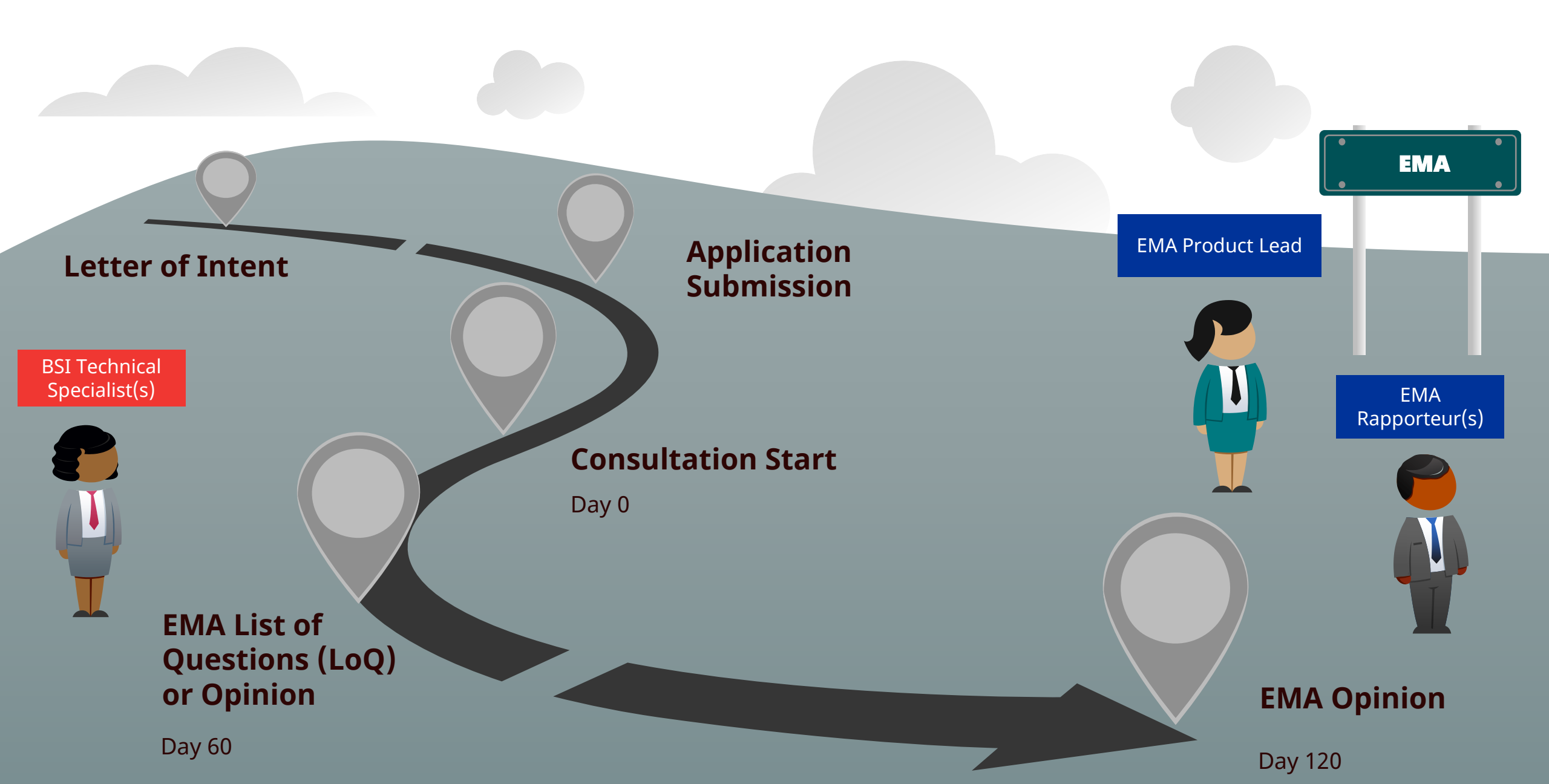


# Roles and Responsibilities for EMA Consultation

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BSI Technical Specialist(s)



Letter of Intent (LOI)



Application Submission



EMA Product Lead



EMA Rapporteur(s)



Consultation Start  
Day 0



EMA List of Questions (LoQ) or Opinion

Day 60



EMA Opinion

Day 120



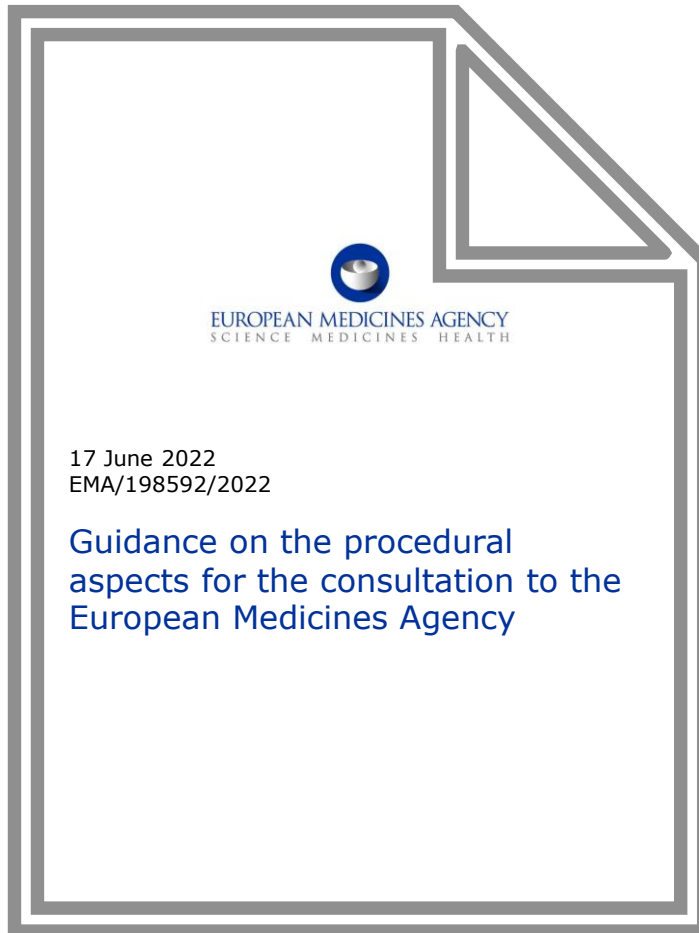
BSI Technical Specialist(s)

EMA Product Lead

EMA

Letter of intent

- BSI Technical Specialist submits the letter of intent to EMA **once all technical review questions are closed**.
- Must be submitted **3 months** before the application for consultation.



## Pre-submission phase:

The notified body is expected to provide an **“intention-to-submit-letter”** to the EMA at least **3 months before the planned submission date** of request for a scientific opinion on the suitability of the CDx with the concerned medicinal product(s), using the **relevant template** that can be found on the European Medicines Agency website.

This intention to submit-letter also aims to trigger the timely **appointment of the rapporteur(s)**.



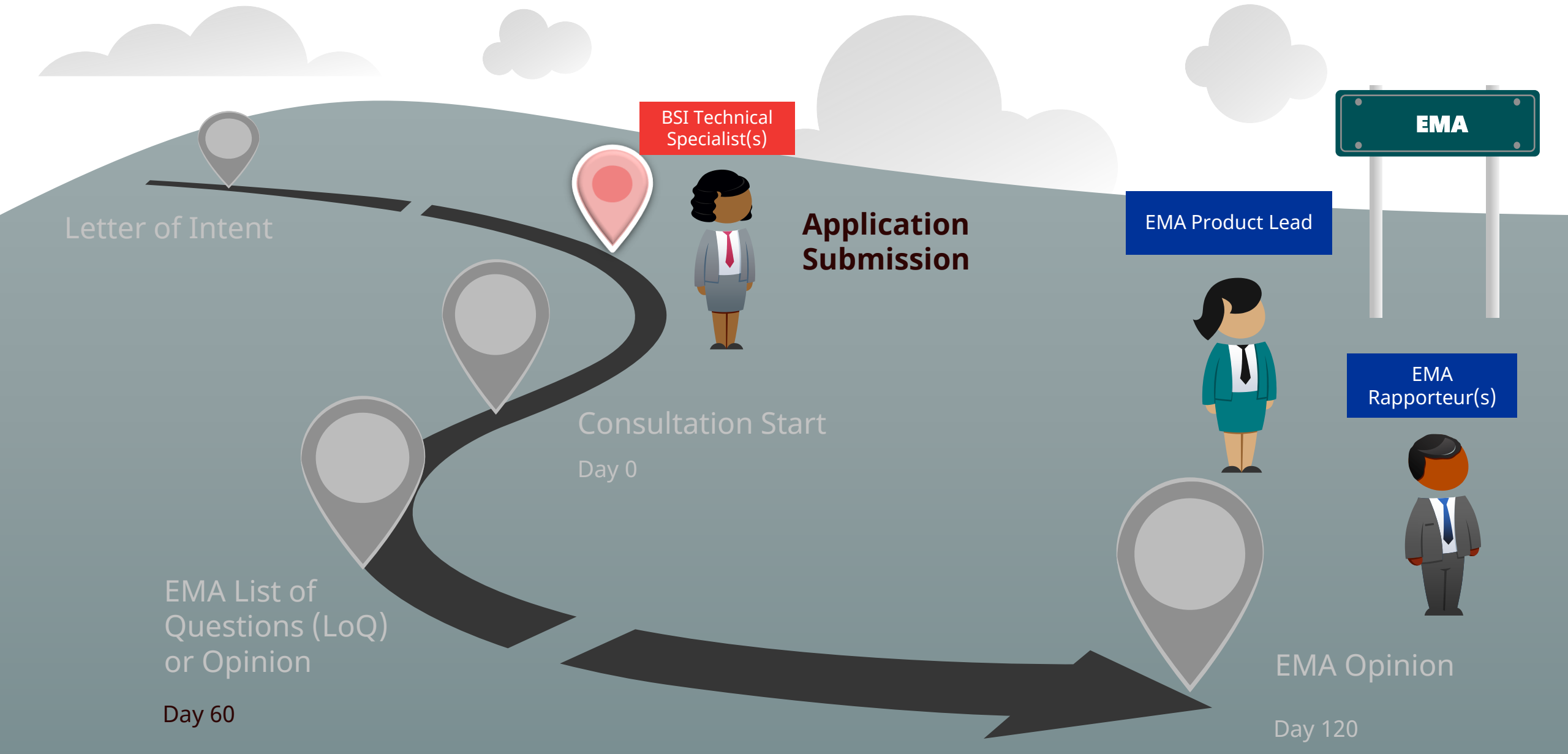
The LOI shall be submitted using the template provided on EMA's website



[Letter of intent for the submission of a consultation to the European Medicines Agency by a notified body on a companion diagnostic in accordance with Regulation \(EU\) 2017/746](#)  
(DOCX/117.99 KB)

First published: 08/07/2022  
Last updated: 31/07/2023  
EMA/781233/2021





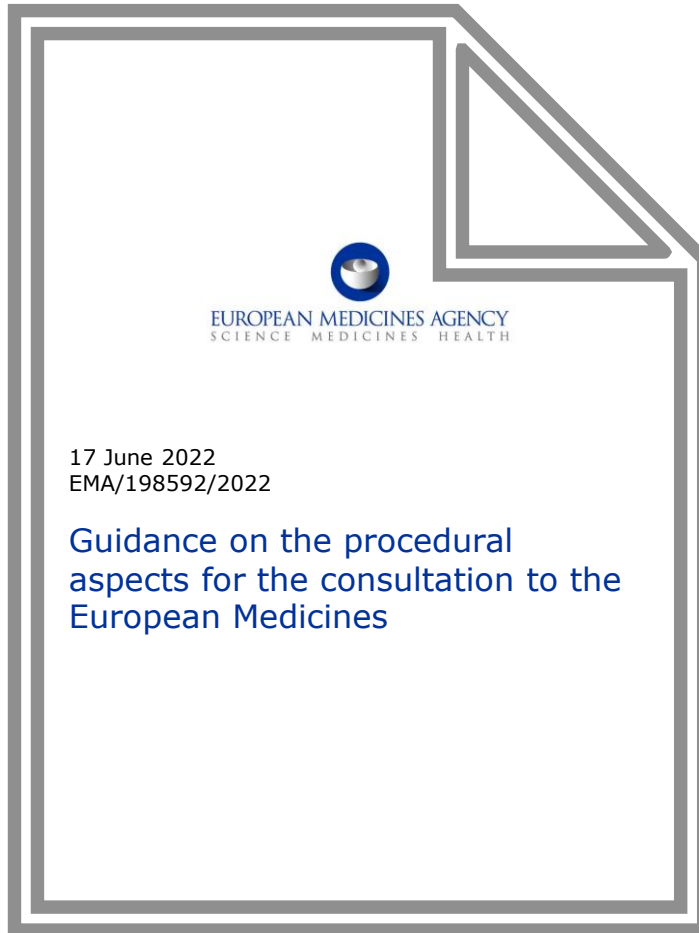
BSI Technical Specialist(s)

EMA Product Lead

EMA



BSI Technical Specialist submits application to  
EMA



## Submission Phase:

The application consists of a:

1. Cover Letter
2. Application Form
3. IFU (draft)
4. SSP (draft)



The Application shall be submitted using the application form template provided on EMA's website



[Application form for initial consultation by a notified body on a companion diagnostic \(DOCX/128.43 KB\)](#)

First published: 20/12/2021

Last updated: 01/07/2022



# EMA Consultation Follows Published Procedural Timetables

**Companion diagnostic consultation**

[Timetable: Companion diagnostic initial consultation \(PDF/232.82 KB\)](#)

First published: 21/01/2022  
Last updated: 11/05/2022  
EMA/3932/2022 Rev.1

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[Timetable: Companion diagnostic initial consultation - ATMP \(PDF/226.62 KB\)](#)

First published: 21/01/2022  
Last updated: 28/04/2023  
EMA/3933/2022 Rev.2

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[Timetable: Companion diagnostic follow-up consultation \(PDF/139.08 KB\)](#)

First published: 08/12/2022  
EMA/3932/2022

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[Timetable: Companion diagnostic follow-up consultation - ATMP \(PDF/172.98 KB\)](#)

First published: 08/12/2022  
EMA/3933/2022



Initial Consultation

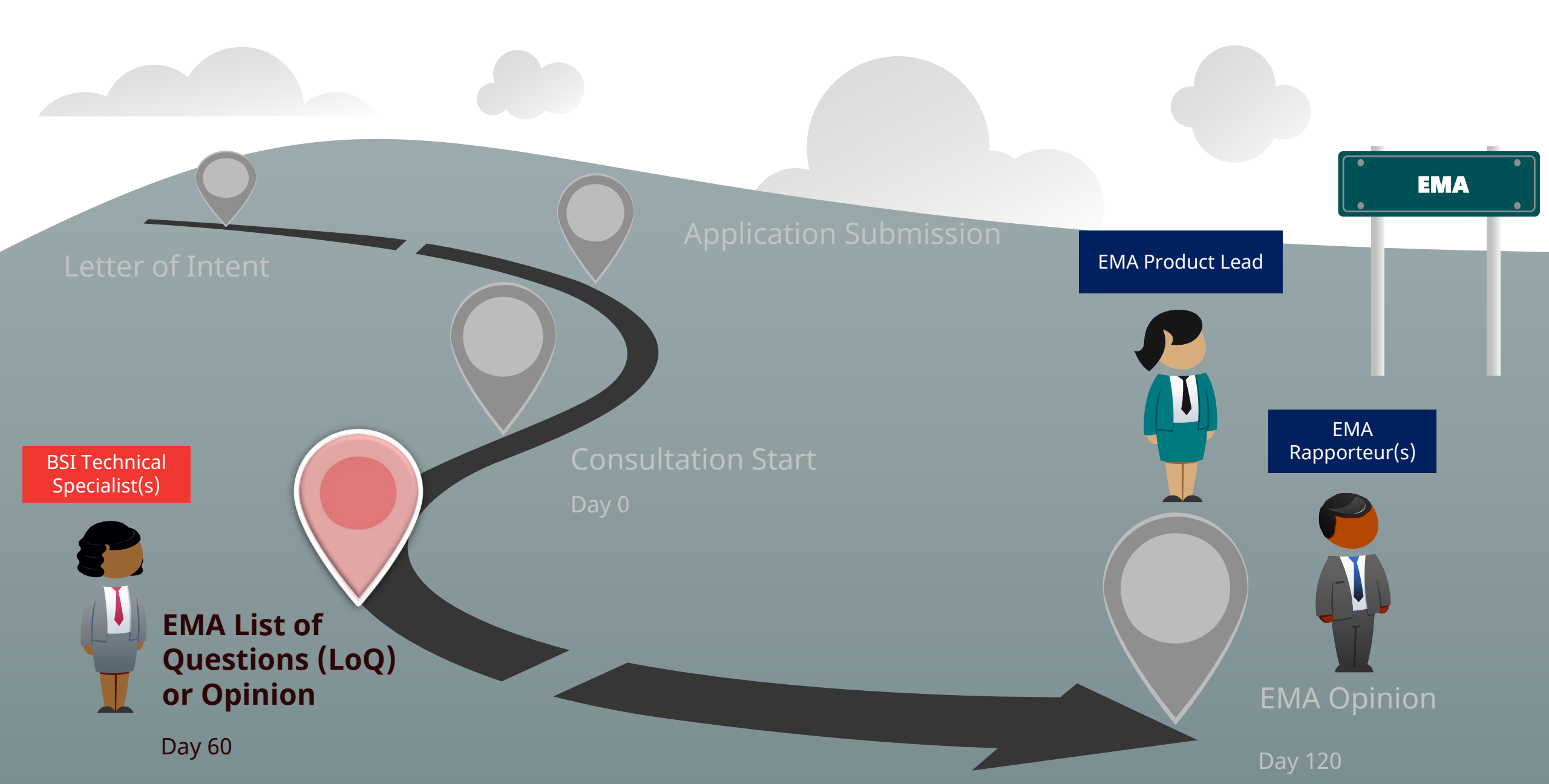


Follow-up Consultation

## Initial submission assessment timetable

### 60-day timetable

	Deadline for Submission (*)	Start date	CHMP Rapporteur AR	Steps only applicable in case of PRAC involvement				Comments from CHMP (**)	Updated CHMP Rapporteur AR (***)	List of questions (LoQ) or Opinion
				PRAC Rapporteur AR	Comments from PRAC (**)	Updated PRAC Rapporteur AR (***)	PRAC outcome (~)			
A1	12/11/2021	29/11/2021	22/12/2021	03/01/2022	05/01/2022	06/01/2022	13/01/2022	17/01/2022	20/01/2022	27/01/2022
A2	26/11/2021	27/12/2021	25/01/2022	28/01/2022	02/02/2022	03/02/2022	10/02/2022	14/02/2022	17/02/2022	24/02/2022
A3	07/01/2022	24/01/2022	22/02/2022	25/02/2022	02/03/2022	03/03/2022	10/03/2022	14/03/2022	17/03/2022	24/03/2022
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A5	04/03/2022	21/03/2022	19/04/2022	22/04/2022	26/04/2022	28/04/2022	05/05/2022	10/05/2022	12/05/2022	19/05/2022
A6	08/04/2022	25/04/2022	24/05/2022	30/05/2022	01/06/2022	02/06/2022	10/06/2022	13/06/2022	16/06/2022	23/06/2022
A7	06/05/2022	23/05/2022	21/06/2022	24/06/2022	29/06/2022	30/06/2022	07/07/2022	11/07/2022	14/07/2022	21/07/2022



EMA offers three options for responses to initial LoQs

60-day after immediate response

30-day after immediate response

30-day after 30-day response

EMA



## Initial submission assessment timetable

### 60-day timetable

	Deadline for Submission (*)	Start date	CHMP Rapporteur AR	Steps only applicable in case of PRAC involvement				Comments from CHMP (**)	Updated CHMP Rapporteur AR (***)	List of questions (LoQ) or Opinion
				PRAC Rapporteur AR	Comments from PRAC (**)	Updated PRAC Rapporteur AR (***)	PRAC outcome (~)			
A1	12/11/2021	29/11/2021	22/12/2021	03/01/2022	05/01/2022	06/01/2022	13/01/2022	17/01/2022	20/01/2022	27/01/2022
A2	26/11/2021	27/12/2021	25/01/2022	28/01/2022	02/02/2022	03/02/2022	10/02/2022	14/02/2022	17/02/2022	24/02/2022
A3	07/01/2022	24/01/2022	22/02/2022	25/02/2022	02/03/2022	03/03/2022	10/03/2022	14/03/2022	17/03/2022	24/03/2022
A4	02/02/2022	22/02/2022	22/03/2022	25/03/2022	30/03/2022	31/03/2022	07/04/2022	11/04/2022	13/04/2022	22/04/2022
A5	04/03/2022	21/03/2022	19/04/2022	22/04/2022	26/04/2022	28/04/2022	05/05/2022	10/05/2022	12/05/2022	19/05/2022
A6	08/04/2022	25/04/2022	24/05/2022	30/05/2022	01/06/2022	02/06/2022	10/06/2022	13/06/2022	16/06/2022	23/06/2022
A7	06/05/2022	23/05/2022	21/06/2022	24/06/2022	29/06/2022	30/06/2022	07/07/2022	11/07/2022	14/07/2022	21/07/2022

60-day after immediate response

## Assessment of Responses to List of Questions (LoQ)

### 60-day timetable after immediate responses→

	Deadline for Submission (*)	Restart	CHMP Rapporteur AR	Steps only applicable in case of PRAC involvement				Comments from CHMP (**)	Updated CHMP Rapporteur AR (***)	Opinion
				PRAC Rapporteur AR	Comments from PRAC (**)	Updated PRAC Rapporteur AR (***)	PRAC outcome (#)			
B1	08/12/2021	09/12/2021	22/12/2021	03/01/2022	05/01/2022	06/01/2022	13/01/2022	17/01/2022	20/01/2022	27/01/2022
B2	05/01/2022	06/01/2022	25/01/2022	28/01/2022	02/02/2022	03/02/2022	10/02/2022	14/02/2022	17/02/2022	24/02/2022
B3	02/02/2022	03/02/2022	22/02/2022	25/02/2022	02/03/2022	03/03/2022	10/03/2022	14/03/2022	17/03/2022	24/03/2022
B4	03/03/2022	04/03/2022	22/03/2022	25/03/2022	30/03/2022	01/04/2022	07/04/2022	11/04/2022	13/04/2022	22/04/2022
B5	30/03/2022	31/03/2022	19/04/2022	22/04/2022	26/04/2022	28/04/2022	05/05/2022	10/05/2022	12/05/2022	19/05/2022
B6	04/05/2022	05/05/2022	24/05/2022	30/05/2022	01/06/2022	02/06/2022	10/06/2022	13/06/2022	16/06/2022	23/06/2022
B7	01/06/2022	02/06/2022	21/06/2022	24/06/2022	29/06/2022	30/06/2022	07/07/2022	11/07/2022	14/07/2022	21/07/2022
B8	27/07/2022	28/07/2022	16/08/2022	19/08/2022	24/08/2022	25/08/2022	01/09/2022	05/09/2022	08/09/2022	15/09/2022

## Initial submission assessment timetable

### 60-day timetable

	Deadline for Submission (*)	Start date	CHMP Rapporteur AR	Steps only applicable in case of PRAC involvement				Comments from CHMP (**)	Updated CHMP Rapporteur AR (***)	List of questions (LoQ) or Opinion
				PRAC Rapporteur AR	Comments from PRAC (**)	Updated PRAC Rapporteur AR (***)	PRAC outcome (~)			
A1	12/11/2021	29/11/2021	22/12/2021	03/01/2022	05/01/2022	06/01/2022	13/01/2022	17/01/2022	20/01/2022	27/01/2022
A2	26/11/2021	27/12/2021	25/01/2022	28/01/2022	02/02/2022	03/02/2022	10/02/2022	14/02/2022	17/02/2022	24/02/2022
A3	07/01/2022	24/01/2022	22/02/2022	25/02/2022	02/03/2022	03/03/2022	10/03/2022	14/03/2022	17/03/2022	24/03/2022
A4	02/02/2022	22/02/2022	22/03/2022	25/03/2022	30/03/2022	31/03/2022	07/04/2022	11/04/2022	13/04/2022	22/04/2022
A5	04/03/2022	21/03/2022	19/04/2022	22/04/2022	26/04/2022	28/04/2022	05/05/2022	10/05/2022	12/05/2022	19/05/2022
A6	08/04/2022	25/04/2022	24/05/2022	30/05/2022	01/06/2022	02/06/2022	10/06/2022	13/06/2022	16/06/2022	23/06/2022
A7	06/05/2022	23/05/2022	21/06/2022	24/06/2022	29/06/2022	30/06/2022	07/07/2022	11/07/2022	14/07/2022	21/07/2022

30-day after immediate response

## Assessment of responses List of Questions (LoQ)

### 30-day timetable after immediate responses<sup>7</sup>

	Deadline for Submission (*)	Restart	CHMP Rapporteur AR	PRAC Rapporteur AR (#)	Comments from CHMP (**)	Comments from PRAC (#)(**)	Updated CHMP Rapporteur AR (~)(***)	Updated PRAC Rapporteur AR (#)(~)(***)	List of Questions (LoQ) or Opinion
D2	01/02/2022	02/02/2022	09/02/2022	09/02/2022	14/02/2022	14/02/2022	17/02/2022	17/02/2022	24/02/2022
D3	01/03/2022	02/03/2022	09/03/2022	09/03/2022	14/03/2022	14/03/2022	17/03/2022	17/03/2022	24/03/2022
D4	30/03/2022	31/03/2022	06/04/2022	06/04/2022	11/04/2022	11/04/2022	13/04/2022	13/04/2022	22/04/2022
D5	26/04/2022	27/04/2022	04/05/2022	04/05/2022	10/05/2022	10/05/2022	12/05/2022	12/05/2022	19/05/2022
D6	25/05/2022	27/05/2022	08/06/2022	08/06/2022	13/06/2022	13/06/2022	16/06/2022	16/06/2022	23/06/2022
D7	28/06/2022	29/06/2022	06/07/2022	06/07/2022	11/07/2022	11/07/2022	14/07/2022	14/07/2022	21/07/2022

## Initial submission assessment timetable

### 60-day timetable

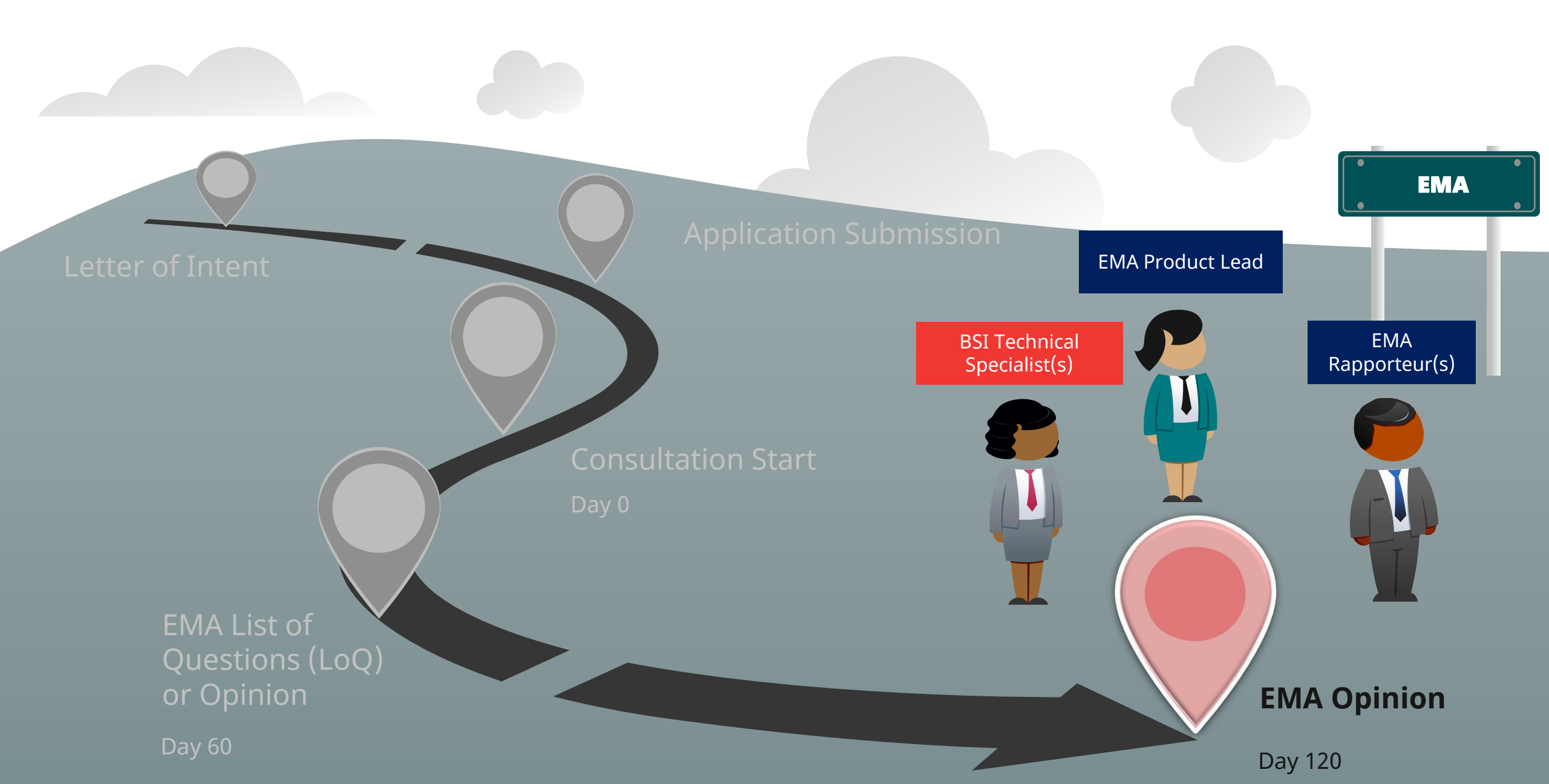
	Deadline for Submission (*)	Start date	CHMP Rapporteur AR	Steps only applicable in case of PRAC involvement				Comments from CHMP (**)	Updated CHMP Rapporteur AR (***)	List of questions (LoQ) or Opinion
				PRAC Rapporteur AR	Comments from PRAC (**)	Updated PRAC Rapporteur AR (***)	PRAC outcome (~)			
A1	12/11/2021	29/11/2021	22/12/2021	03/01/2022	05/01/2022	06/01/2022	13/01/2022	17/01/2022	20/01/2022	27/01/2022
A2	26/11/2021	27/12/2021	25/01/2022	28/01/2022	02/02/2022	03/02/2022	10/02/2022	14/02/2022	17/02/2022	24/02/2022
A3	07/01/2022	24/01/2022	22/02/2022	25/02/2022	02/03/2022	03/03/2022	10/03/2022	14/03/2022	17/03/2022	24/03/2022
A4	02/02/2022	22/02/2022	22/03/2022	25/03/2022	30/03/2022	31/03/2022	07/04/2022	11/04/2022	13/04/2022	22/04/2022
A5	04/03/2022	21/03/2022	19/04/2022	22/04/2022	26/04/2022	28/04/2022	05/05/2022	10/05/2022	12/05/2022	19/05/2022
A6	08/04/2022	25/04/2022	24/05/2022	30/05/2022	01/06/2022	02/06/2022	10/06/2022	13/06/2022	16/06/2022	23/06/2022
A7	06/05/2022	23/05/2022	21/06/2022	24/06/2022	29/06/2022	30/06/2022	07/07/2022	11/07/2022	14/07/2022	21/07/2022

## Assessment of responses to List of Questions (LoQ)

### 30-day timetable after 30-day response time

	Deadline for Submission (*)	Restart	PRAC Rapporteur AR (+)	Comments from PRAC (**)(+)	Updated PRAC Rapporteur AR (***)(+)	CHMP Rapporteur AR	PRAC outcome (#)(+)	Comments from CHMP (**)	Updated CHMP Rapporteur AR (~)(***)	Opinion
C1	22/12/2021	29/12/2021	03/01/2022	05/01/2022	06/01/2022	12/01/2022	13/01/2022	17/01/2022	20/01/2022	27/01/2022
C2	25/01/2022	26/01/2022	31/01/2022	02/02/2022	03/02/2022	09/02/2022	10/02/2022	14/02/2022	17/02/2022	24/02/2022
C3	22/02/2022	23/02/2022	28/02/2022	02/03/2022	03/03/2022	09/03/2022	10/03/2022	14/03/2022	17/03/2022	24/03/2022
C4	23/03/2022	24/03/2022	28/03/2022	30/03/2022	31/03/2022	06/04/2022	07/04/2022	12/04/2022	13/04/2022	22/04/2022
C5	19/04/2022	20/04/2022	25/04/2022	26/04/2022	28/04/2022	04/05/2022	05/05/2022	10/05/2022	12/05/2022	19/05/2022
C6	24/05/2022	25/05/2022	30/05/2022	01/06/2022	02/06/2022	08/06/2022	10/06/2022	13/06/2022	16/06/2022	23/06/2022
C7	21/06/2022	22/06/2022	27/06/2022	29/06/2022	30/06/2022	06/07/2022	07/07/2022	11/07/2022	14/07/2022	21/07/2022
C8	16/08/2022	17/08/2022	22/08/2022	24/08/2022	25/08/2022	31/08/2022	01/09/2022	05/09/2022	08/09/2022	15/09/2022

30-day after  
30-day  
response



Letter of Intent

Application Submission

EMA Product Lead

BSI Technical Specialist(s)

EMA Rapporteur(s)

EMA

Consultation Start  
Day 0

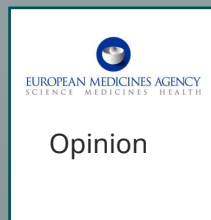
EMA List of Questions (LoQ) or Opinion  
Day 60

EMA Opinion  
Day 120

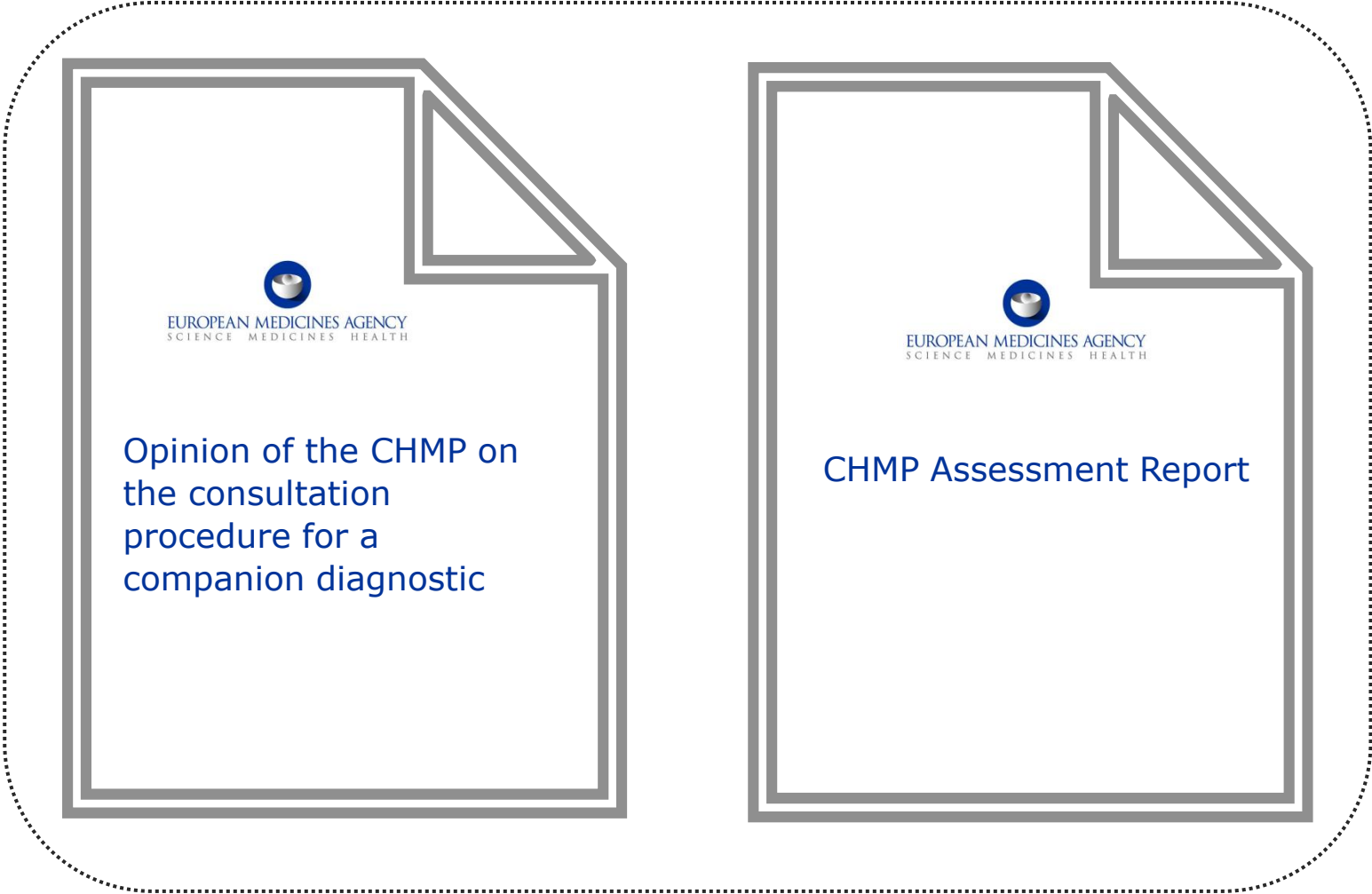
BSI Technical Specialist(s)

EMA Product Lead

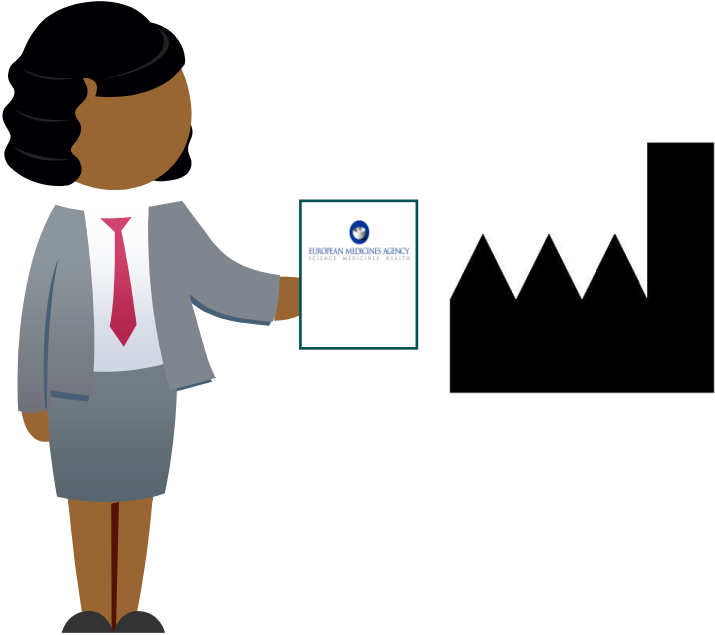
EMA



EMA Product Lead will provide BSI with EMA's opinion on the suitability of the CDx device in relation to the the corresponding medicinal product(s)



BSI Technical Specialist(s)





**Completeness  
Check**



**Consultation**



**Technical  
Documentation  
Review**



**Final Review &  
Decision Making**

**BSI Scheme  
Manager**



**BSI Decision  
Maker**



**TD Review**

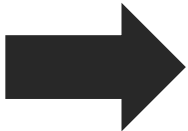


**EU Quality Management System Certificate**

Regulation (EU) 2017/746,  
*Annex IX Chapter I and III*

**EU Technical Documentation Assessment Certificate**

Regulation (EU) 2017/746,  
*Annex IX Chapter II*



**CE**  
**2797**



# References (links to literature)

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REGULATION (EU) 2017/746 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (IVDR) [\(Link\)](#)

BSI IVDR Documentation Submission Best Practice Guidance [\(Link\)](#)

MDCG 2020-16 (rev.2) Guidance on Classification Rules for in vitro Diagnostic Medical Devices under Regulation (EU) 2017/746 [\(Link\)](#)

MDCG 2022-9 Summary of safety and performance Template [\(Link\)](#)

European Medicines Agency – Medical Devices Landing Page [\(Link\)](#)

Links to:

- Guidance on procedural aspects for the consultation to European Medicines Agency by a notified body on companion diagnostics
- Q&A on the guidance document
- Letter of intent form
- Application forms for initial and follow-up consultation
- Assessment report template

## BSI Contact Details

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