

What is digital health technolog

- The Federal Food, Drug and Cosmetic act defines a medical device as:
 - not a drug
 - intended for diagnosis, treatment or prevention of disease
- Software, by itself, can meet this definition
 - Software as a Medical Device (SaMD) is defined by International medical device regulators forum (IMDRF) as "software intended to be used for one or more medical purposes that perform these purposes without being part of a hardware medical device." http://www.imdrf.org/docs/imdrf/final/technical/imdrf-tech-131209-samd-key-definitions-140901.docx
- A consumer computing devices becomes a medical device if it meets this definition using:
 - Apps
 - hardware extensions
- Embedded software (e.g. automated perimetry with normative database)

















Challenges for digital health technology

- Understanding what makes a digital health technology a regulated device
- Safety considerations of unmodified hardware (e.g. light hazards)
- Interoperability and wireless coexistence
- Setting (hospital, clinic, OR, ED, school, pharmacy, home)
- Intended users: patients vs. practitioners
- Intended use: diagnosis, treatment, prevention vs automation, clinical decision support
- Small changes can have profound consequences in safety, efficacy and user interactions















Challenges of privacy and cybersecur

- HIPAA Compliance
 - Institutions may limit access to data from mobile devices
- Data Encryption
- OS Updates and Responses to Security Flaws
 - **End-user** is responsible for installing updates
 - Developer is responsible for ensuring data security and safety























Digital health and the practice of medicine

- Telemedicine
 - Non-physician users: technicians, photographers, reading centers
 - Where is there a need for oversight?
 - Is synchronous real-time communication necessary?
- Patient self use
 - Performance of the device in the hands of unskilled users
 - Patterns of misuse, errors and associated risk











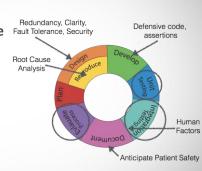








- Restrict installation to validated configurations (impossible to test all permutations)
- Establish robust quality assurance
 Fault Tolerance, Security frameworks
 - Include testing for safety and effectiveness
 - Logging
- Acknowledge the importance of human factors
 - UI/UX design and changes
 - **Documentation**
 - Clear error reporting

















Advantages of digital health technological

- Brings technology to the point of care and improves
 - e.g. mobile fundus photography, refraction
- Improves efficiency and provides automation
- Streamlines communication between patients and providers
- Gain insights into health states between clinic visits
 - e.g. home IOP monitoring
- Network connectivity provides insight into device performance in the real world
 - Enables real-time monitoring of safety signals and rapid turnaround of fixes

















- FDA Guidance:
- https://www.fda.gov/MedicalDevices/DigitalHea Ith/default.htm
- FDA presubmission program: http://www.fda.gov/downloads/medicaldevices /deviceregulationandguidance/guidancedocume nts/ucm311176.pdf
- Digital health mailbox: digitalhealth@fda.hhs.gov

















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- Public Workshop Mobile Medical Applications Draft Guidance, September 12-13, 2011: https://www.federalregister.gov/documents/2011/08/12/2011-20574/mobile-medical-applications-draft-guidance-public-workshop Accessed July 6, 2017.
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