## Safe(?) Interoperability

Sandy Weininger US FDA



ALD + PALLY

## Disclaimer

- The mention of commercial products, their sources, or their use in connection with material reported herein is not to be construed as either an actual or implied endorsement of such products by the Department of Health and Human Services.
- This presentation reflects the views of the author and should not be construed to represent FDA's views or policies.

## Who am I?

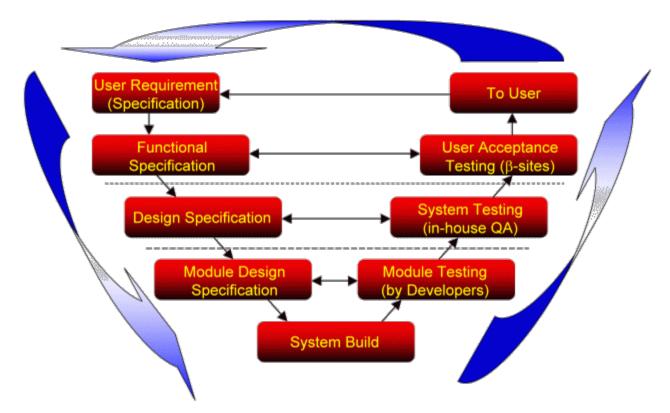
Ē

Senior Electrical/Biomedical Engineer Division of Biomedical Physics Office of Science and Engineering Laboratories Center For Devices and Radiological Health US Food and Drug Administration 10903 New Hampshire Ave Silver Spring, MD 20993

sandy.weininger@fda.hhs.gov

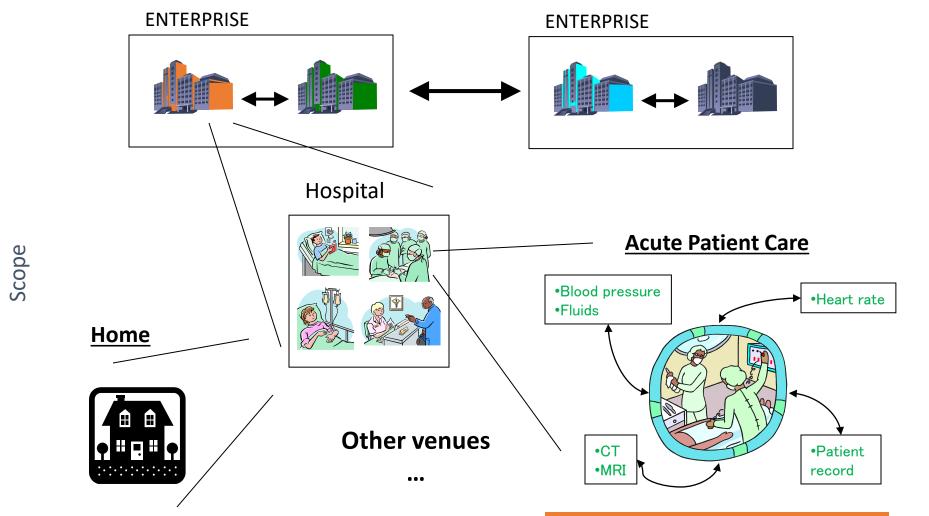


Ę



## Interoperability roles/responsibilities

Ē



5

## Physical and Virtual Assets and Their Interaction

What is the physical asset? What is the virtual asset?

What is the system?

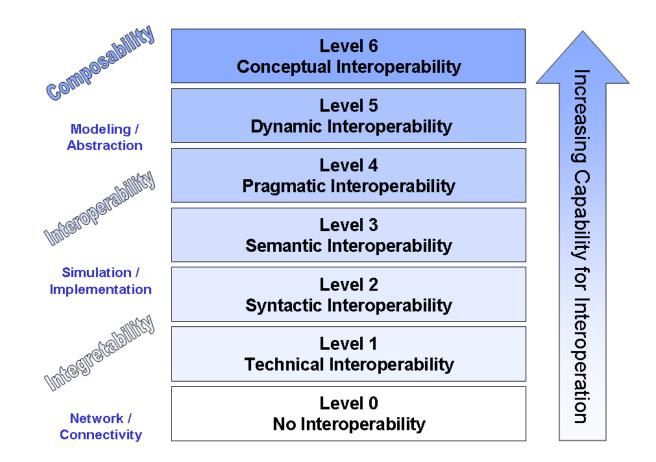
what are the actors, interactions, and system boundaries

What intended use are you claiming?

What information is passed between the physical and virtual assets in real time?

### Levels of Interoperability - Turnista

Ę



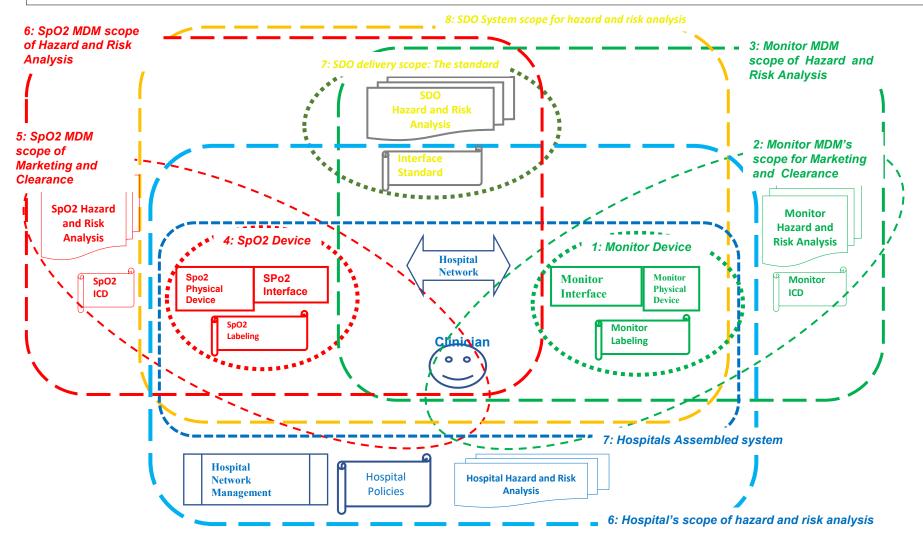
Turnitsa, C.D. (2005). Extending the Levels of Conceptual Interoperability Model. Proceedings IEEE Summer Computer Simulation Conference, IEEE CS Press

### Ē

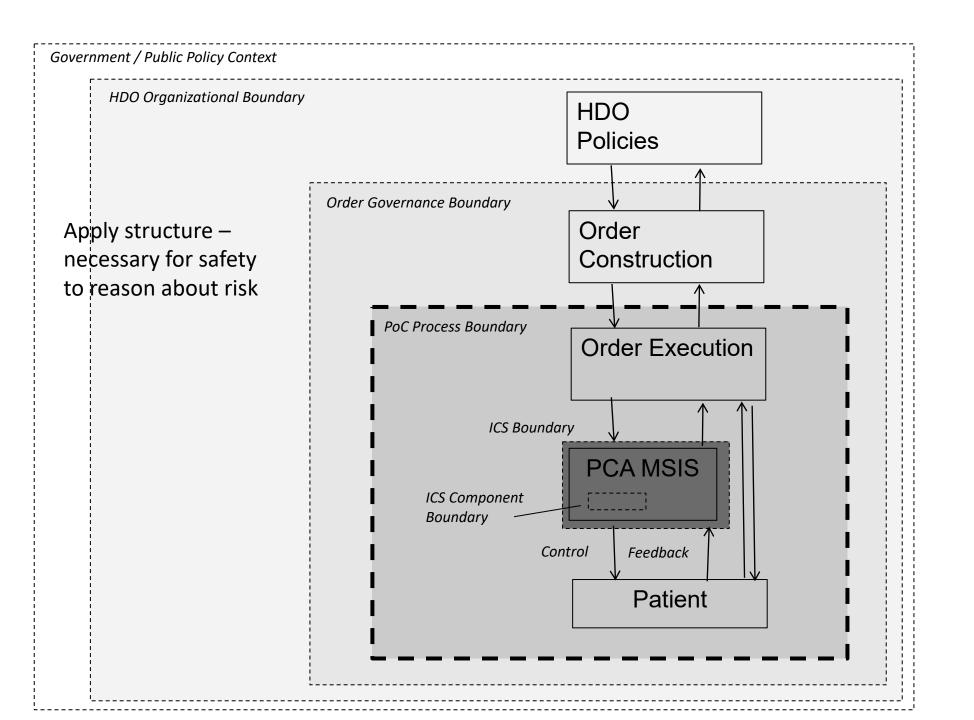
### What is the System?

- 1: Monitor Instantiation in the hospital
- 2: Monitor MDMs Scope of Labeling, Marketing Claims, User
- Manuals, and Intended Use
- 3: Monitor MDM's system for the scope of hazard and risk analysis8:
- 4: SpO2 Device instantiation in the hospital
- 5: Spo2 MDM's scope for Labeling, Marketing Claims, User Manuals, and Intended Use 6: Spo2 MDM's scope for hazard and risk analysis

- 9: Hospital's scope of the assembled system
- 10: Hospital's cope of hazard and risk analysis, quality assurance, and non-FDA regulatory compliance

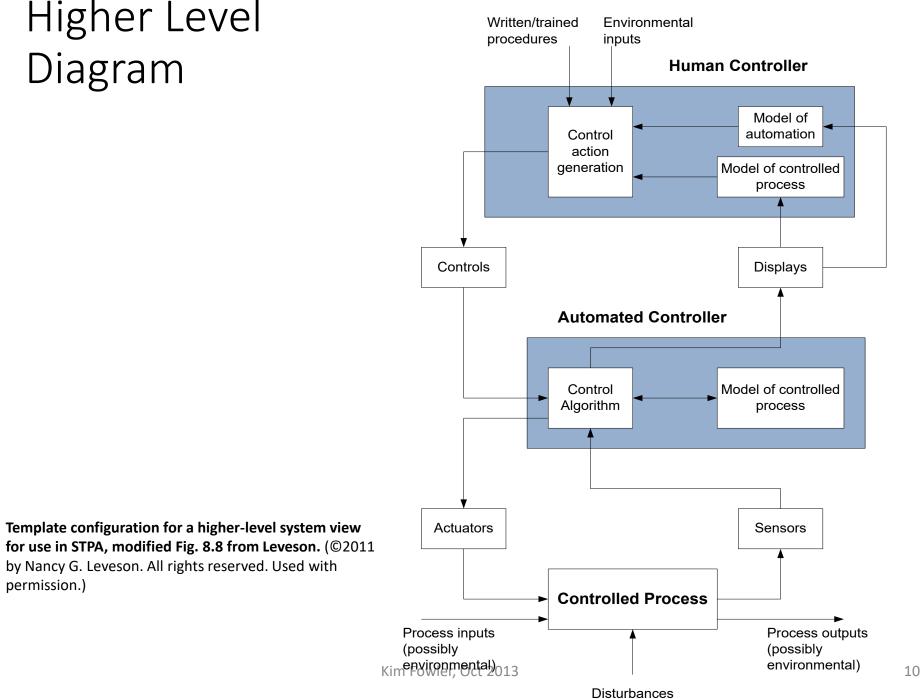






# Higher Level Diagram

permission.)



## Highest Level Diagram

SYSTEM DEVELOPMENT

Policy, stds.

Work

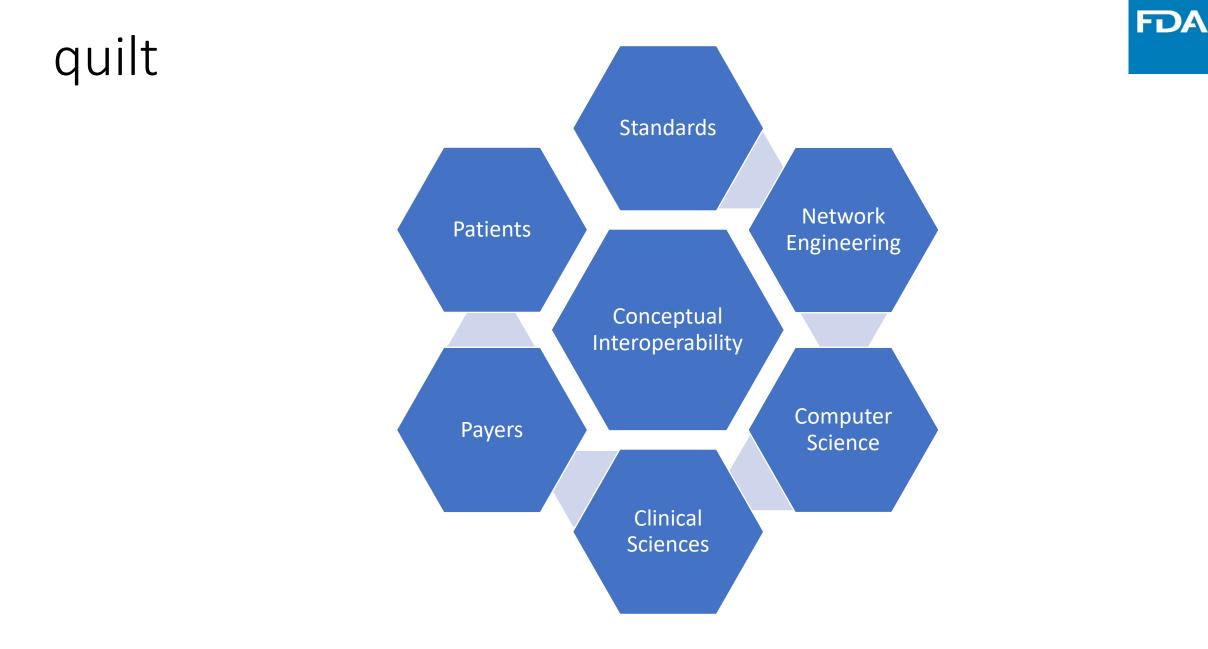
Procedures

#### SYSTEM OPERATIONS **Congress and Legislatures Congress and Legislatures** Government Reports Lobbying Government Reports Legislation Hearings and open Lobbying Legislation meetings Hearings and open meetings Accidents Accidents **Government Regulatory Agencies Government Regulatory Agencies** Industry Associations, Industry Associations, User Associations, Unions, User Associations, Unions, **Insurance Companies, Courts Insurance Companies, Courts** Regulations Regulations Certification Info. Accident and incident Standards Standards Change reports reports Certification Certification Operations reports Whistleblowers Legal penalties Legal penalties Maintenance Reports Accidents and incidents Case Law Case Law Change reports Company Whistleblowers Management Company Status Reports Safety Policy Management **Risk Assessments** Standards Resources Incident Reports Safety Policy **Operations Reports** Standards Project Resources Management Operations Hazard Analyses Management Safety Standards Hazard Analyses Safety-Related Changes **Progress Reports Progress Reports** Change requests Work Instructions Design, Audit reports Documentation Problem reports **Operating Assumptions** Safety Constraints Test reports **Operating Procedures Operating Process** Standards Hazard Analyses **Test Requirements Review Results** Human Controller(s) Implementation and assurance Automated Controller Revised Safety operating procedures Reports Hazard Analyses Actuator(s) Sensor(s) Software revisions Manufacturing Documentation Hardware replacements Physical Management **Design Rationale** Process Maintenance safety reports and Evolution audits Problem Reports work logs Incidents inspections Change Requests Manufacturing Performance Audits

### Fig. 4.4 from Leveson. (©2011 by Nancy G. Leveson. All rights reserved. Used with permission.)

Figure 4.4 General form of a model of sociotechnical control.

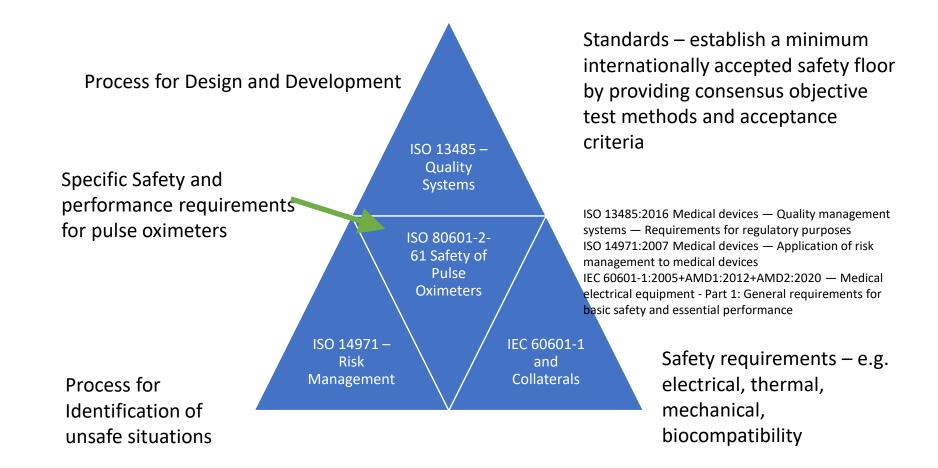
KIIII I OWICI, OCC 2010



**OSEL** Accelerating patient access to innovative, safe, and effective medical devices through best-in-the-world regulatory science

ŧ

## Medical Device (Pulse Oximeter) Safety Standards



### CORRESPONDENCE



### Racial Bias in Pulse Oximetry Measurement

In the multicenter cohort, the unadjusted analyses involving patients with an oxygen saturation of 92 to 96% on pulse oximetry showed an arterial blood gas oxygen saturation of less than 88% in 160 of 939 measurements in Black patients (17.0%; 95% CI, 12.2 to 23.3) and in 546 of 8795 measurements in White patients (6.2%; 95% CI, 5.4 to 7.1). In device applications, the Food and Drug Administration requires reporting of demographic subgroups to mitigate risk. However, our findings highlight an ongoing need to understand and correct racial bias in pulse oximetry and other forms of medical technology. Michael W. Sjoding, M.D. Robert P. Dickson, M.D.

Theodore J. Iwashyna, M.D., Ph.D. Steven E. Gay, M.D. Thomas S. Valley, M.D. University of Michigan Medical School Ann Arbor, MI msjoding@umich.edu

White patients Black patients 100 Arterial Oxygen Saturation (%) 75 70 89 90 91 92 93 94 95 96 Oxygen Saturation on Pulse Oximetry (%) No. of Paired Measurements White patients 817 92 Black patients 20 52 127 126 188 225 59 83

#### Figure 1. Accuracy of Pulse Oximetry in Measuring Arterial Oxygen Saturation, According to Race.

Shown is a comparison of paired measurements of pulse oximetry readings of oxygen saturation and time-matched directly measured arterial oxygen saturation among hospitalized patients who were stratified according to race. The shaded area indicates an arterial oxygen saturation of less than 88%. In the box plot, the horizontal line within each box represents the median, the top and bottom of each box represent the upper and lower limits of the interquartile range, and the whiskers represent 1.5 times the interquartile range. Outliers outside this range are indicated by data points.

1



Contact me Email: sandy.Weininger@fda.hhs.gov Lab: FDA/CDRH/OSEL/DBP (Division of Biomedical Physics)