



**Global Harmonization Working Party**  
Towards Medical Device Harmonization

## FINAL DOCUMENT

**Title:** Guidance for Additional Considerations to support Conformity Assessment of In vitro Companion Diagnostic Medical Devices

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40 **Preface**

41 This document was produced by the Global Harmonization Working Party. The GHWP  
42 would like to acknowledge and has considered the documents, “In Vitro Companion Diagnostic  
43 Devices” developed by US FDA and “Guideline for Approval and Evaluation of In Vitro  
44 Companion Diagnostic Devices” developed by the MFDS, Republic of Korea.

45 This document is intended to provide non-binding guidance for use in the regulation of  
46 companion IVD medical devices, and has been subject to consultation throughout its  
47 development.

48 There are no restrictions on the reproduction, distribution, translation or use of this  
49 document. However, incorporation of this document, in part or in whole, into any other  
50 document does not convey or represent an endorsement of any kind by the Global  
51 Harmonization Working Party.

52

53 **1.0 Introduction**

54 This document has been developed to encourage and support convergence of regulatory  
55 systems in the GHWP member economies. It is intended for use by Regulatory Authorities  
56 (RAs), Conformity Assessment Bodies (CABs) and industry, and will provide benefits in  
57 establishing, in a consistent way, an economic and effective approach to the control of IVD  
58 medical devices in the interest of public health. It seeks to strike a balance between the  
59 responsibilities of RAs to safeguard the health of their citizens and their obligations to avoid  
60 placing unnecessary burdens upon the industry.

61 This guidance document is intended to guide staff of RAs and CABs who are assessing  
62 In Vitro Companion Diagnostic Medical Devices (IVD-CDx) for possible premarket regulatory  
63 pathways and assist manufacturers of the IVD-CDx to develop and demonstrate relevant  
64 performance characteristics for their products. Work Group 2 of the GHWP has prepared this  
65 guidance document. Comments or questions should be directed to the Chair of GHWP Work  
66 Group 2 whose contact details may be found on the GHWP web page.

67 This guidance should be read in conjunction with the GHWP documents on Essential  
68 Principles of Safety and Performance, Conformity Assessment, Labelling and Submission  
69 Dossier on IVD medical devices. It provides additional considerations specifically for IVD-  
70 CDx.

## 71 **2.0 Rationale, Purpose and Scope**

### 72 **2.1 Rationale**

73 Recent development of scientific technology has led to the development of personalized  
74 medicine for treatment. The process for selecting appropriate therapeutic products, based on a  
75 patient's characteristics has grown in importance. IVD-CDx provide information that is  
76 essential for the safe and effective use of a therapeutic product, for example such information  
77 can be based on the expression levels of genes, proteins, or the occurrence of any mutations.  
78 Guidance is required on the process to demonstrate safety and performance of an IVD-CDx in  
79 relation to the therapeutic product with which it is intended to be used.

### 80 **2.2 Purpose**

81 The purpose of this guidance is to define IVD-CDx and guide manufacturers,  
82 Regulatory Authorities (RAs) and conformity Assessment Bodies (CABs) on requirements for  
83 submission and conformity assessment for IVD-CDx performance.

### 84 **2.3 Scope**

85 This guidance applies to IVD companion diagnostic devices which are essential for the  
86 safe and effective use of a corresponding targeted therapeutic product, in order to:

- 87 • Identify patients who are most likely to benefit from the therapeutic product;
- 88 • Identify patients likely to be at increased risk for adverse reactions as a result of  
89 treatment with the therapeutic product;
- 90 • Monitor response to treatment with the therapeutic product for the purpose of  
91 adjusting treatment (e.g., dose determination, administration schedule, and treatment  
92 discontinuation) to achieve improved safety or effectiveness;
- 93 • Identify patients in the population for whom the therapeutic product has been  
94 adequately studied, and found safe and effective, i.e., there is insufficient information  
95 about the safety and effectiveness of the therapeutic product in any other population.

96 Note: The tests performed to determine donor-recipient matching (blood, blood composition,  
97 cells, tissues, and organs) are not included. However, the Human Leukocyte Antigen (HLA)  
98 analysis method falls within the scope of the IVD-CDx when the HLA analysis method is  
99 essential for the safe and effective use of therapeutic products rather than intended to determine  
100 donor-recipient matching.

101

## 102 **3.0 Categories of IVD-CDx development**

### 103 **3.1 Novel IVD-CDx**

104 Two approaches can occur in the development of a new IVD-CDx:

- 105 • Contemporaneous development of a new therapeutic product and a new IVD-CDx;
- 106 • Development of a novel IVD-CDx used for previously approved therapeutic product.

### 107 **3.2 Follow-on IVD-CDx**

108 A follow-on companion diagnostic is a device using, either the same or different  
109 technology, that is intended to be used with the therapeutic product in the same indication of  
110 use and patient population, as in the labelling of the original companion diagnostic. However,  
111 the development of a follow-on companion diagnostic device may not have a therapeutic  
112 partner to conduct a new additional clinical trial, or the availability of the patient samples from  
113 the original clinical trial is limited, where the original IVD-CDx was developed and the  
114 therapeutic product were evaluated together.

### 115 **3.3 Changes and additions of the intended use of IVD-CDx**

116 a) Addition of types of samples for in vitro companion diagnostic devices that have  
117 previously been approved (e.g., tissue sample → tissue sample or liquid sample)

118 b) Addition of new therapeutic products of which the response is predictable to an existing  
119 (previously approved) in vitro companion diagnostic devices' intended use.

120 (e.g., Drug A → Drug A or Drug B)

121 c) As in vitro companion diagnostic devices that have previously been approved have  
122 multiple drugs whose correlation with response in vitro companion diagnostic devices  
123 can be established, they are integrated into one specific group name.

124 (e.g., Drug A, B, C, D → Drug Alphabet)

125

## 126 **4.0 References**

127 AHWP/WG2/PF002:2016 Principles of Conformity Assessment for In Vitro Diagnostic (IVD)  
128 Medical Devices

129 AHWP/WG2/PF003:2016 Submission Dossier for Demonstrating Conformity to the Essential  
130 Principles of Safety and Performance of In Vitro Diagnostic Medical Devices

131 AHWP/WG1a/F002:2013 Essential Principles of Safety and Performance of IVD Medical  
132 Devices

- 133 US FDA Guidance for Industry: In Vitro Companion Diagnostic Devices 2014
- 134 Korea MFDS guideline “Guideline for Approval and Evaluation of In Vitro Companion  
135 Diagnostic Devices” (2022/Guideline-1267)
- 136 CLSI Harmonized Terminology database: <http://htd.clsi.org/>
- 137 US FDA Guidance for Industry: Developing and Labeling in vitro companion diagnostic  
138 devices for a specific group of oncology therapeutic products 2020
- 139 US FDA Guidance for Industry and Food and Drug Administration Staff (Draft): Principles for  
140 Codevelopment of an In Vitro Companion Diagnostic Device with a Therapeutic Product (2016)
- 141 US FDA Guidance for Industry (Draft): Use of Circulating Tumor DNA for Early-Stage Solid  
142 Tumor Drug Development (May 2022)

143

## 144 **5.0 Definitions**

145 **Medical Device** - The term is as defined in AHWP/WG2-WG1/F001:2016 “Definition of the  
146 Terms ‘Medical Device’ and ‘In Vitro Diagnostic (IVD) Medical Device’

147

148 **Cut-off for an IVD-CDx:** The test output which determines the clinical decision for treatment,  
149 i.e. subjects with test results above the cut-off value are eligible for treatment, whereas those  
150 with test results below the cut-off value are not given the treatment. In some scenarios, subjects  
151 with test results below the cut-off value (i.e., the biomarker negative or wild-type population)  
152 may also receive treatment (Example – in colorectal cancer patients determined to be KRAS  
153 wild-type (absence of mutations in codon 12 and 13) may receive cetuximab treatment)

154 Note: The clinical cut-off value is validated in the therapeutic product clinical trial.

155 [Ref. *US FDA Guidance (Draft), Principles for Codevelopment of an In Vitro Companion*  
156 *Diagnostic Device with a Therapeutic Product (2016)*]

157

158 **In Vitro Companion Diagnostic Medical Device (IVD-CDx):** Means an In vitro diagnostic  
159 medical device which provides information that is essential for the safe and effective use of a  
160 corresponding therapeutic product to:

161 a) Identify, before and/or during treatment, patients who are most likely to benefit from  
162 the corresponding therapeutic product;

163 b) Identify, before and/or during treatment, patients likely to be at increased risk of serious  
164 adverse reactions as a result of treatment with the corresponding therapeutic product;

165 c) Monitor response to treatment with the therapeutic product for the purpose of adjusting  
166 treatment (e.g., determination of the dosage, the timing of administration, and  
167 discontinuation of the administration) to achieve improved safety or effectiveness; or



168 d) Identify patients in the population for whom the therapeutic product has been  
169 adequately studied, and found safe and effective, i.e., there is insufficient information  
170 about the safety and effectiveness of the therapeutic product in any other population.

171 Note 1: Except the products for compatibility evaluation for blood transfusion and transplant  
172 purposes.

173 Note 2: In specific cases, IVD-CDx may be used for monitoring response or adjusting treatment,  
174 but “therapeutic drug monitoring (TDM)” in general does not fall under the scope of  
175 IVD-CDx.

176 [Ref. *US FDA Guidance, In Vitro Companion Diagnostic Devices (2014)*; *MFDS Guidance,*  
177 *Guideline for Approval and Evaluation of In Vitro Companion Diagnostic Devices (2022)*]

178

179 **Negative Percent Agreement (NPA):** The percentage of agreement of the test method’s  
180 ability to obtain negative results in concordance with negative results obtained by the  
181 comparative method.

182 [Ref. *CLSI Harmonized Terminology database*]

183

184 **Positive Percent Agreement (PPA):** The percentage of agreement of the test method’s ability  
185 to obtain positive results in concordance with positive results obtained by the comparative  
186 method.

187 [Ref. *CLSI Harmonized Terminology database*]

188

189 **Comparative method:** In a method evaluation experiment, a well-characterized method that  
190 serves as the basis for assigning the true concentration of an analyte in a sample.

191 Note 1: The method(s) being used to validate the new automated system, also known as a  
192 comparator method;

193 Note 2: The comparative method(s) may be a reference standard or a nonreference standard.

194 [Ref. *CLSI Harmonized Terminology database*]

195

196 **Reference method:** A methodology that has exact and clear descriptions of the necessary  
197 conditions and procedures that provide sufficiently accurate and precise laboratory data for it  
198 to be used to assess the validity of other test methods.

199 [Ref. *CLSI Harmonized Terminology database*]

200

201 **Specific group of therapeutic products:** The specific group refers to the indication that the  
202 therapeutic products have in common which is captured in the therapeutic products' labelling  
203 (including sections other than the indications and usage section).

204 Note: See section 7.2.3. b)-3) for additional information about integrating multiple therapeutic  
205 product names into one specific group name in the labelling of IVD-CDx.

206 [Ref. *US FDA Guidance, Developing and Labeling in vitro companion diagnostic devices for*  
207 *a specific group of oncology therapeutic products (2020)*]

208

209 **Therapeutic product (as used in this guidance):** Includes therapeutic, preventive, and  
210 prophylactic drugs and biological products.

211 [Ref. *US FDA Guidance, In Vitro Companion Diagnostic Devices (2014)*]

212

213 **Liquid biopsy:** Liquid biopsy is a technique used for the diagnosis and observation of diseases  
214 such as cancer by analyzing liquid samples rather than analyzing solid biological tissues. The  
215 biggest advantage of liquid biopsy is that it is a non-invasive sample collection method. Blood  
216 and body fluids such as serum, plasma, exosomes, circulating tumor cells (CTC), cerebrospinal  
217 fluid (CSF), urine, and saliva are used as samples.

218 [Ref. *MFDS Guidance, Guideline for Approval and Evaluation of In Vitro Companion*  
219 *Diagnostic Devices (2022)*]

220

221 **Circulating tumor DNA (ctDNA):** Circulating tumor DNA is tumor-derived fragmented  
222 DNA shed into a patient's bloodstream that is not associated with cells.

223 [Ref. *US FDA Guidance for Industry (Draft): Use of Circulating Tumor DNA for Early-Stage*  
224 *Solid Tumor Drug Development (2022)*]

225

## 226 **6.0 Conformity Assessment of IVD-CDx**

227 The IVD-CDx is a subset of IVD medical devices, which are developed and used in  
228 conjunction with therapeutic products. The requirements for IVD-CDx follow the GHWP  
229 general IVD medical device guidance, such as Essential Principles of Safety and Performance,  
230 Conformity Assessment, Labelling and Submission Dossier. However, the characteristics and  
231 application of IVD-CDx in conjunction with therapeutic products requires some specific  
232 considerations to be taken into account with respect to the GHWP general guidance for IVD  
233 medical device.

234

## 235 **7.0 Considerations to Essential Principles of Safety and Performance**

236 IVD-CDx manufacturers need to take into account several specific considerations  
237 related to the Essential Principles specified in the GHWP document AHWP/WG1a/ F002:2013,  
238 Essential Principles of Safety and Performance of IVD Medical Devices.

### 239 **7.1 General Considerations**

240 a) The intended use should include the trade name of the therapeutic product (including  
241 its active ingredient) to be used with the IVD-CDx.

242  
243 b) The parameter for measurement and detection shall be clarified according to the  
244 following:

245  
246 • The name of gene, protein, clone (in case of mAb) etc. targeted shall be  
247 specified;

248 • If the IVD-CDx is to be used for the diagnosis of a specific genotype, when  
249 necessary, the corresponding genetic sequence/codon, mutation domain etc.  
250 shall be included.

251  
252 c) If multiple types of specimen are mentioned in the intended use, data for each specimen  
253 type should be generated, in particular differences and potential limitations should be  
254 described, e.g., tissue versus serum/plasma.

255  
256 d) Relationship of the IVD-CDx to the therapeutic product:

257  
258 • the clinical relationship of the use of the companion diagnosis for the  
259 corresponding therapeutic product, such as therapeutic target identification,  
260 efficacy, potential adverse reaction and dose adjustment, administration, shall  
261 be considered;

262 • the specific intended use of the corresponding therapeutic product should be  
263 considered

264  
265 e) It is desirable to use a risk-based approach for the approval and review of an IVD-  
266 CDx. Accordingly, the review should be focused on the following matters.

267  
268 • Purpose of use of an IVD-CDx;

269 • Level of confidence in safety and effectiveness;

270 • Level of risk associated with false positive and negative results of an IVD-  
271 CDx

272 f) In the case of contemporaneous development of therapeutic product and IVD-CDx,  
273 pharmaceutical companies and medical device manufacturers must prepare for clinical  
274 trials by sharing information with each other and obtain approval for the protocol for  
275 therapeutic product and IVD-CDx separately for each.

276 g) For simultaneous approval of therapeutic product and IVD-CDx both of which were  
277 contemporaneously developed, IVD-CDx developers are guided to help them to match  
278 the timing of the clinical development of therapeutic product and the submission date  
279 of the application form. Therefore, pharmaceutical companies and IVD-CDx  
280 manufacturers are encouraged to consult with relevant departments of authority in the  
281 early development phase.

## 282 7.2 Specific considerations according to IVD-CDx Categories

### 283 7.2.1. For Novel IVD-CDx

284 a) The review of the clinical effectiveness of an IVD CDx determines if the response  
285 to a therapeutic product is more favorable (statistically significant) in the patient  
286 group screened by applying the IVD CDx than in the randomized patient group  
287 (compliance with the license conditions, the safety, and efficacy of the therapeutic  
288 product) and evaluate the clinical performance of the IVD CDx (sensitivity,  
289 specificity, or equivalence to reference methods).

291 b) In the case of the recent simultaneous clinical evaluation on IVD-CDx and targeted  
292 therapy, the clinical design in which patients who showed a positive result for IVD-  
293 CDx are divided into a test group (targeted therapy) and a control group (placebo,  
294 chemotherapy, etc.) and compared each other is common, but the clinical  
295 evaluations on some of the second-line treatments are designed for evaluation in  
296 the test group only without a control group.

298 c) In the case of IVD-CDx for which a tissue sample or liquid biopsy can be used, the  
299 performance evaluation including drug reactivity of oncogenes in the tissue of  
300 primary cancer and liquid biopsy should be performed in the same patient. In  
301 addition, comparative analysis data with other test methods are reviewed to prove  
302 the test results of circulating tumor DNA.

- 303 • In general, companion diagnostics on solid tumor using liquid biopsy shows  
304 low sensitivity compared to tissue samples, so if there is no evidence to refute  
305 it, it is reasonable to select tissue samples with priority. However, if the  
306 collection of a tissue sample is rather a big risk to the patient, liquid biopsy  
307 can be used for the test alternatively, but if the test result is negative, it is  
308 reasonable to conduct the retest with a tissue sample (Avoid missing treatment  
309 opportunities due to false negative result).

310  
311 Note: When developing a new IVD-CDx that can be used with either tissue samples  
312 or liquid biopsies, it is important to evaluate not only the concordance between  
313 specimen types, but also the accuracy of predicting drug reactivity through liquid  
314 biopsy testing. However, drug reactivity through liquid biopsy testing can be  
315 confirmed retrospectively (when a patient is prescribed a drug based on the results  
316 of a tissue sample, and the liquid biopsy collected before the drug is taken is tested  
317 to confirm drug reactivity).

318  
319

320 d) Review the analytical performance (sensitivity, specificity, accuracy,  
321 reproducibility, linearity, etc.) of IVD-CDx. In addition, if multiple biomarker tests,  
322 such as multiple sites of mutation, are required, analytical performances of each  
323 biomarker should be ensured.

- 324 • Analytical performance should be assessed after the sampling method and  
325 criteria (area of tissue, tumor ratio within the tissue, thickness of tissue, etc.)  
326 have been validated, and validation data should be reviewed along with the  
327 appropriateness of the criteria during acceptance and audit.

328  
329 Note: Nucleic acid extraction kits are used for isolation of DNA and/or RNA,  
330 capturing genetic material that may contain specific gene sequences, including  
331 variants associated with drug response. Nucleic acid extraction kits must be notified  
332 or approved by the authorities. Particularly for liquid biopsies (blood), the quality  
333 of circulating tumor DNA has a significant impact on test results because the  
334 amount of circulating tumor DNA is very low and nucleic acids are damaged while  
335 circulating in the human bloodstream. Therefore, it is recommended that  
336 quantitative and qualitative assessment of extracted nucleic acids be performed. It  
337 is also recommended that internal quality controls to measure the amount of  
338 amplifiable nucleic acids among the damaged nucleic acids be included in the IVD-  
339 CDx being developed.

#### 340 7.2.2. For Follow-on product equivalent to the first approved IVD-CDx

341 a) When developing a follow-on product that is equivalent to the previously approved  
342 IVD-CDx with clinical evidence in conjunction with the therapeutic products, its  
343 clinical performance should be evaluated through comparison study (correlation  
344 and concordance between the original and the follow-on products). However, drug  
345 response studies that were required for approval of the original approved product  
346 are not required for approval of the follow-on product.

347  
348 Note 1: It is preferable that the equivalence between the new and existing IVD-  
349 CDx is assessed with the same specimens collected from subjects who participated  
350 in a clinical trial of the relevant therapeutic product. However, if the same  
351 specimens cannot be secured, the equivalence trials can be conducted separately by  
352 using specimens collected and stored from a new subject group based on an  
353 equivalent selection condition compared to the clinical trial.

354  
355 Note 2: If there is a previously approved IVD-CDx using two types of samples (e.g.,  
356 tissue or liquid biopsy) and comparison testing is performed using this as a control  
357 IVD-CDx, only the degree of agreement between them (between the approved  
358 IVD-CDx and follow-on product with each specimen type; between sample types  
359 of test IVD-CDx) can be evaluated without the drug response studies.

360  
361 b) Analytical performance (sensitivity, specificity, accuracy, reproducibility, linearity,  
362 etc.) of follow-on IVD-CDx.

363  
364 Note: It is important to note that IVD-CDx does not determine the presence or  
365 absence of a specific biomarker (mutation), but rather predicts the presence or  
366 absence of drug response, and the limit of detection (LOD) is not related to the

367 accuracy in predicting drug response (e.g., If a qPCR-based product with a clinical  
368 evaluation of drug response prediction is first approved as an IVD-CDx, and a  
369 subsequent droplet digital PCR-based product with a great limit of detection is  
370 developed, it is not possible to say that the drug response prediction accuracy of the  
371 subsequent product exceeds that of the first licensed product without an evaluation  
372 of drug response prediction for that drug.). Therefore, it is necessary to confirm that  
373 the cut-offs of the original approved IVD-CDx clinically evaluated concurrently  
374 with the corresponding drug and the cut-offs of the follow-on product are  
375 quantitatively equivalent.

### 376 **7.2.3. Addition of new specimen types or new drugs to the intended use**

#### 377 a) Addition of new specimen type to the intended use

378  
379 If an IVD-CDx is changed, which only uses tissue specimens, to additionally use  
380 liquid biopsies, evaluation of the concordance of drug response prediction between  
381 the same specimen types from same patient and review of appropriateness of the  
382 concordance level are required. The evidence is also required to support its  
383 qualification by comparing the performance of genetic testing on liquid biopsies to  
384 other testing methods.

385  
386 Note: If there is an addition of specimen type to the intended use of an IVD-CDx  
387 using only tissue specimens that also allows for the use of liquid biopsies,  
388 evaluation of the accuracy of predicting drug response beyond concordance  
389 between specimen types is required. However, the accuracy of predicting drug  
390 response from liquid biopsies can be evaluated retrospectively (i.e., subjects are  
391 selected for drug prescription based on the results of the tissue specimen, and liquid  
392 biopsies collected prior to drug administration are tested to confirm drug response).

#### 393 394 b) Addition of a companion drug to the intended use

- 395
- 396 • Addition of new therapeutic product

397 If IVD-CDx, which can predict reactivity to a specific therapeutic product (A),  
398 is approved, and the purpose of the use is expanded to predict the reactivity of  
399 new drug (B) without any changing the IVD-CDx itself, the clinical  
400 performance of IVD-CDx on a new drug (B) should be reviewed from the same  
401 perspective as for the case where a new IVD-CDx is developed.

402  
403 Note: These considerations apply to the addition of new disease into the  
404 previously approved intended use of IVD-CDx.

- 405
- 406 • Addition of generic drug

407 In the case of adding a generic drug (A') for an original drug (A), if there is data  
408 demonstrating its equivalence with existing drugs, the generic drug can be  
409 added without a separate clinical performance evaluation in relation to the  
410 prediction of drug response.

411  
412

- 413 • Integration of names of multiple anticancer drugs into one special group name

414 It will be also possible to consolidate multiple anticancer drug names into one  
415 representative group name in the Intended Use field, if IVD-CDx can predict  
416 drug responses to multiple anticancer drugs.

- 417  
418 (1) If multiple drugs with predictable reactivity are listed as Drug A, Drug B,  
419 Drug C, Drug D, Drug E, Drug F, etc. in the IVD-CDx's Intended Use, the  
420 characteristic equivalence levels of the different anticancer drugs can be  
421 considered collectively, and only drugs with higher equivalence levels can  
422 be listed under one common group name.

423

**\* Checklist of characteristics when unifying special group names**

Check mechanism of drug action, interactions (concentration of biomarkers or genomic volumes by concentration or variant type) between drugs and biomarkers (targets of drugs, proteins identified by IVD-CDx, or specific gene states), cut-off identity of IVD-CDx by each drug response prediction, and effects of biomarkers identified by IVD-CDx to cancer cells in the patient subjected to prescription.

424

- 425 (2) (Labelling for performance) Although names of multiple anticancer drugs  
426 are consolidated into a specific single group name in the "Intended Use"  
427 section, the drug response in patients identified by IVD-CDx is presented  
428 for each anticancer drug in the "Performance" section. However, if the IVD-  
429 CDx is approved without clinical trials for the drug, and it is intended to  
430 change the specific single group name listed in the 'Intended Use' section to  
431 be equivalent to the previously approved drug, the results of additional drug  
432 response and correlation tests are not required, and the test results are not  
433 described in the 'Performance' section.

434

- 435 (3) If a follow-on IVD-CDx is changed to use a special group name for an  
436 Intended Use prior to the initially approved product, the descriptions of drug  
437 response testing and correlation testing in the "Performance" section may  
438 be omitted in Performance section, but the data for the above validation may  
439 be required the same as for previously licensed IVD-CDx.

440

Considerations for integrating multiple anticancer drug names into a single special group name:

1. Can a single IVD-CDx (identifying the appropriate patient group for potential treatment) be described in grouping multiple anticancer drugs into a specific group?
2. Are sufficient studies on the mechanism of action of the specific group of anticancer drugs designed for use with the IVD-CDx, and interactions between biomarkers and drugs identified with IVD-CDx based on the variation in the molecular structure available?
3. Are there sufficient clinical experience with at least two anticancer drug

treatments for indications with the same biomarker secured?

4. Has the analytical performance of the IVD-CDx been tested for each biomarker providing indication information?
5. Has the clinical performance of IVD-CDx been tested with the indicated treatment? (Clinical performance may be tested by prospective or prospective/retrospective methods, but the cut-off level between anticancer-related drugs in the special group should be confirmed)

441

Example of integrating multiple anticancer drug names into a single special group name:

In non-small cell lung cancer (NSCLC), EGFR exon 19 deletion mutation or exon 21 (L858R) substitution mutation promotes phosphorylation of EGFR, leading to the promotion of cancer cell proliferation. Therefore, similar target anticancer drugs (afatinib, erlotinib, gefitinib, osimertinib, dacomitinib) that inhibit it can be collectively referred to as a single group name called tyrosine kinase inhibitor (TKI).

However, drugs that **only act on exon 20 (T790M) substitution mutations** due to TKI resistance cannot be included in the above TKI.

※ *Osimertinib (Tagrisso): At first approval, it was approved as a second-line treatment for patients with a history of TKI first-line therapy and cancer of exon 20 (T790M) substitution mutation, but it was expanded through further clinical study as first-line treatment for patients with exon 19 deletion mutations or exon 21 (L858R) substitution mutations.*

442

### 443 7.3 Details of the Performance Test

444 The safety, efficacy, and efficiency of therapeutic products requiring CDx are directly  
445 affected by the performance of IVD-CDx.

#### 446 7.3.1. IVD-CDx in a pharmaceutical trial

447 Since the clinical significance of IVD-CDx and the establishment and evaluation of  
448 clinical cut-offs are performed using clinical trials of drugs conducted on patients identified by  
449 IVD-CDx, IVD-CDx developers need to obtain information related to the drug's clinical trials  
450 from pharmaceutical companies in advance and cooperate with them.

451 In the case of applying for IND approval of the protocol on the therapeutic product, if  
452 the use of an unauthorized IVD-CDx is included in it for the purpose of CDx of the therapeutic  
453 product, and if the study is determined to be a significant risk study with regard to the use of  
454 the IVD, then IDE approval of the protocol on the clinical performance of IVD must be  
455 obtained separately.



456 In addition, the clinical significance and cut-off values of the IVD-CDx should be  
457 described for the premarket approval, based on the clinical performance of the associated  
458 therapeutic product, including the name of the therapeutic product, test name, test methods,  
459 and test results.

### 460 **7.3.2. A test on the evaluation of equivalence of IVD-CDx**

#### 461 a) Evaluation of IVD-CDx equivalence

462 If an equivalent product is being developed, as there is a previously approved  
463 product with an evaluation on clinical performance that was tested together with  
464 the therapeutic product, it is possible to replace the evaluation on the prediction of  
465 drug reactivity with the evaluation of the equivalence with the previously approved  
466 product (clinical performance evaluation-correlation).

#### 467 b) Precautions for equivalence tests of an IVD-CDx

468

469 Ideally, equivalence tests of an IVD-CDx should be carried out using the samples  
470 collected from the subjects who participated in the clinical trials of a corresponding  
471 therapeutic product, but the samples may not be available for various reasons. If  
472 that is the case, leftover samples or newly collected samples from a different  
473 subject group can be used for separate equivalence tests among IVD-CDx as long  
474 as the sample and subject selection criteria used in the original clinical trials are  
475 satisfied. The sample should be maintained in a similar manner to the previous trial,  
476 and it is recommended that prior arrangements be made with the approval authority  
477 to ensure that the sample are properly maintained with respect to timing of sample  
478 collection, quality of lesions, and fixation and storage conditions.

479 c) The criteria for positive or negative agreements required to be considered  
480 appropriate for IVD-CDx should be reviewed in consideration of the characteristics  
481 of the disease, the number of patients (realistically verifiable cases), and the  
482 confidence interval. The validity of such criteria should be referred to the authority.

483

### 484 **7.3.3. Considerations for analytical performance evaluation**

485 Analytic Performance evaluation of IVD-CDx may include the following:

486 a) Accuracy;

487 b) Precision (reproducibility, repeatability);

488 c) Specificity (interference, cross-reactivity, etc.);

489 d) Measuring range and linear line segments, such as quantitative range or detection  
490 limits;

491 e) Analytical Cut-off;

492 f) Reference materials and in-house reference materials;

- 493 g) Information about the sample being collected, including sampling method,  
494 processing method, and storage method;  
495 h) Possibility and its inhibition of non-specific reactions such as reaction conditions  
496 and analysis conditions;  
497 i) Potential misjudgments due to contamination and measures to eliminate them;  
498 j) Sample and reagent stability.

499 Note: In addition, if it is intended to change the approval for the applied device and test method,  
500 sufficient results of the validation data must be provided to ensure that the analytical method  
501 can be measured/detected equally before and after the change through the validation of the  
502 analytical method.

503

## 504 **8.0 Labelling of IVD-CDx**

505 The labelling for IVD-CDx should include the following in addition to the labelling  
506 requirements for the IVD medical devices as described in the GHWP document “*Label and*  
507 *Instructions for Use for IVD Medical Devices*”.

508 An IVD-CDx that is intended for use with a therapeutic product must specify the  
509 therapeutic product(s) for which it has been approved or cleared for use. In some cases, if  
510 evidence is sufficient to conclude that the IVD-CDx is appropriate for use with a specific group  
511 of therapeutic products, the intended use/indications for use should name the therapeutic  
512 product group, rather than each specific product within the group.(refer the 7.2.3.b)

513

## 514 **9.0 Requirements of Submission Dossier of IVD-CDx**

515 A submission dossier for IVD-CDx should include, in addition to the requirements  
516 specified in the GHWP *Submission Dossier Documents For Demonstrating Conformity To The*  
517 *Essential Principles Of Safety And Performance Of In Vitro Diagnostic Medical Devices*,  
518 evidence related to additional requirements for the EP for IVD-CDx as described in Section 7  
519 of this guidance.

520

## 521 **10.0 Assessment of IVD-CDx Submission Dossier**

### 522 **10.1 IVD-CDx will be assessed in three different categories for regulatory approval**

- 523 a) Novel developed IVD-CDx;  
524 b) Follow-on IVD-CDx;

525 c) Addition of new specimen types or new drugs to the intended use

## 526 **10.2 Novel IVD-CDx**

527 a) The efficacy of the therapeutic product related to the IVD-CDx should be reviewed by  
528 the RA or CAB responsible for the therapeutic product approval.  
529

530 b) The analytical performance characteristics of the IVD-CDx should be reviewed as  
531 described as AHWP/WG2/PF002:2016, Principles of Conformity Assessment for In  
532 Vitro Diagnostic (IVD) Medical Devices, with special focus on the characteristics that  
533 provide the selection criteria as demonstrated by the clinical study of the therapeutic  
534 product. In addition, the specific aspects of analytical performance as described in  
535 section 7 of this guidance should be reviewed. This part of the submission dossier will  
536 be reviewed by the RA or CAB responsible for the IVD medical device approval.  
537

538 c) The clinical performance of the IVD-CDx should be assessed by review of the  
539 therapeutic product manufacturer's demonstration of the statistical significance of the  
540 superiority of the response to the therapeutic product in the trial group screened by the  
541 IVD-CDx compared with the randomized patient group in accordance with current  
542 therapeutic product approval regulations. The specific aspects related to clinical  
543 performance and clinical performance studies as described in section 7 should be  
544 reviewed. This part of the submission dossier will be reviewed by the RA or CAB  
545 responsible for IVD medical device and therapeutic product approval.  
546

547 Note: If the therapeutic product and IVD-CDx are reviewed in parallel, it is important  
548 to share related information between applicants to synchronize the regulatory pathway  
549 and the approval timeline. Therefore, in such cases it is recommended that early phase  
550 combined pre-submission discussions are held with the IVD medical device and  
551 therapeutic product RAs.  
552

## 553 **10.3 Follow-on IVD-CDx**

554 a) The analytical performance characteristics of the IVD-CDx should be reviewed as  
555 described as AHWP/WG2/PF002:2016. Principles of Conformity Assessment for In  
556 Vitro Diagnostic (IVD) Medical Devices. In addition, the specific aspects of analytical  
557 performance as described in section 7 of this guidance should be reviewed. This part  
558 of the submission dossier will be reviewed by the RA or CAB responsible for the IVD  
559 medical device approval.  
560

561 b) The comparative clinical performance data for the concordance between the equivalent  
562 product and the existing IVD-CDx should be reviewed. These performance data may  
563 include the correlation analysis between them. The specific aspects related to clinical  
564 performance and clinical performance studies as described in Section 7 should be  
565 reviewed. This part of the submission dossier will be reviewed by the RA or CAB  
566 responsible for the IVD medical device approval.

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#### **10.4 Addition of new specimen types or new drugs to the intended use**

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a) The analytical performance characteristics of the IVD-CDx should be reviewed as described as AHWP/WG2/PF002:2016. Principles of Conformity Assessment for In Vitro Diagnostic (IVD) Medical Devices. In addition, the specific aspects of analytical performance as described in section 7 of this guidance should be reviewed. This part of the submission dossier will be reviewed by the RA or CAB responsible for the IVD medical device approval.

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b) For addition of new specimen type, the comparative clinical performance data between sample types obtained from same patients should be reviewed. For addition of new therapeutic products, the clinical performance of the IVD-CDx with the new drug should be reviewed from the same perspective as if a new IVD-CDx were being developed. The specific aspects related to clinical performance and clinical performance studies as described in Section 7 should be reviewed. This part of the submission dossier will be reviewed by the RA or CAB responsible for the IVD medical device approval.