Frequently Asked Questions (FAQs) on Drug-Medical Device Combination Products

No	FAQ
1	**Question:** **Registered Medical devices are required by law to undergone conformity assessment conducted by Conformity Assessment Body (CAB). Does ancillary medical device component have to undergo the same process as well?** Answer: Ancillary medical devices component for a Drug-Medical Device Combination Product is not subjected to undergone conformity assessment conducted by CAB. However, an endorsement letter shall be obtained from MDA for medium to high risk medical device. Refer Appendix 5: Endorsement Letter Application Flow Chart for Ancillary Medical Device Component.
2	**Question:** **Shall low risk medical devices require endorsement letter as a prerequisite for drug approval by NPRA?** Answer: Endorsement letter is not be required for low risk medical devices.
3	**Question:** **Does the drug-medical device combination product endorsement letter can be used for different drug approval application with the same medical device brand name?** Answer: Yes, applicant is required to list down all drug products in the endorsement letter form; and it is only applicable for the same medical device brand name and submission type
4	**Question:** **Does medical device registered under Act 737 fulfill the requirement for reference countries; enabling them to submit an abridged dossier requirement?** Answer: Yes, ancillary medical devices registered with MDA under Act 737 are eligible for abridged dossier requirement. Refer the dossier requirement outlined in Table 2: Recognised regulatory agencies approval / clearance

5 **Question:**

What are the documents that qualify a drug-medical device combination product to be eligible under the abridged evaluation route?

Answer:

The documents that qualify for the application to be eligible under the abridged evaluation route are as depicted in Table 2 of the Guideline

No	Recognised Regulatory Authority	Approval Type
1	**Therapeutic Goods Administration (TGA), Australia**	TGA Medicinal licence
2	**Health Canada, Canada**	Health Canada Medicinal Licence
3	**European Medicines Agency (EMA) or Other Competent Authorities from EU Member States** **European Union (EU)**	Certificate of Medicinal Products Annex II Section 3 or Annex V of MDD (for Class IIA) Annex II Section 3 or Annex III coupled with Annex V of MDD (for Class IIB) Annex II Section 3 and 4 of MDD (for Class III) Annex II Section 3 and 4 of AIMDD (for active implantable medical device) EC Declaration of Conformity Article 117 opinion report issued by a Notified Body
4	**Pharmaceuticals and Medical Devices Agency (PMDA), Japan**	Premarket approval from PMDA
5	**Food and Drug Administration (FDA) USA**	USFDA Approved Drug Letter USFDA 510 (k) clearance letter

			USFDA Pre-Market Approval (PMA) Letter
	6	**Medical Device Authority, Malaysia**	Medical Device Registration Certificate and Number

6 **Question:**

How many reference countries approval is needed for drug-medical device combination product to make it eligible to only submit an abridged dossier requirement?

Answer:

Only 1 reference countries approval is sufficient for the ancillary medical device components to be eligible for the abridged dossier requirement

7. **Question:**

What are the criteria needs to be met by a medical device for it to be considered low risk medical devices?

Answer:

A low risk ancillary medical device component **must meet** the following criteria:

1. A non-invasive ancillary medical device component which come into contact with injured skin; intended to be used as a mechanical barrier, for compression or for absorption of exudates only, i.e. they heal by primary intent;
2. A non-invasive ancillary medical device component intended for channelling or storing
    a. body liquids or tissues,
    b. liquids or
    c. gases

    for the purpose of eventual infusion, administration or introduction into the body
3. An invasive ancillary medical device component, used transiently (under 60 minutes) with respect to body orifices (other than those which are surgically invasive) and which:
    a. not intended for connection to an active medical device, or
    b. intended for connection to a Class A medical device only
4. An invasive ancillary medical device component, short term use (under between 60 minutes to 30 days) and are intended for use in the oral cavity as far as the pharynx, in an ear canal up to the ear drum or in a nasal cavity
5. Reusable surgical instruments

	6. Active ancillary medical device component intended for diagnosis; intended solely to illuminate the patient's body, with light in the visible or near infra-red spectrum 7. Ancillary medical Device component manufactured from or incorporating animal or human cells/tissues/derivatives thereof, whether viable or non-viable; intended to come in contact with intact human/patient skin only
8.	**Question:** **What are the examples of low risk medical device?** Examples of low risk medical devices are asthma inhaler, syringe without needle, measuring cup, measuring spoon, medicine dropper, dosing spoon, pipette
9.	**Question:** **What are the criteria needs to be met by a medical device for it to be considered medium-high risk medical devices?** Answer: Medium-high risk ancillary medical device components **must meet** the following criteria: 1. For non-invasive ancillary medical components: a. intended to be used principally with wounds which have breached the dermis, including devices principally intended to manage the microenvironment of a wound b. intended to be used principally with wounds which have breached the dermis and can only heal by secondary intent c. intended for channelling or storing i. body liquids or tissues ii. liquids or iii. gases; and they may be connected to a medium-high risk, active medical device d. intended for use of i. channeling blood, or ii. storing or channeling other body liquids, or iii. for storing organs, parts of organs or body tissues e. blood bags f. intended to modify the biological or chemical composition of i. blood, ii. other body liquids, or iii. other liquids

	intended for infusion into the body; and intended for infusion into the body 2. For invasive ancillary medical components: a. Intended to be used short-term/long term and are invasive with respect to body orifices (other than those which are surgically invasive) b. Intended to be used long term in the oral cavity as far as the pharynx, in an ear canal up to the ear-drum or in a nasal cavity c. Intended to be connected to a medium-high risk, active medical device and are invasive with respect to body orifices (other than those which are surgically invasive) d. All surgically invasive devices intended for transient/short term/long term use, except reusable surgical instruments e. All implantable devices, and long-term surgically invasive devices 3. For active ancillary medical components: a. All active therapeutic ancillary device components intended to administer or exchange energy b. All active ancillary device components intended to control or monitor the performance of medium-high risk, active therapeutic devices c. Active ancillary device components intended for diagnosis, except to be used solely to illuminate the patient's body d. intended to emit ionizing radiation and intended for diagnostic and/or interventional radiology, including devices which control or monitor such devices, or those which directly influence their performance e. intended to administer and/or remove medicinal products 4. Misc ancillary medical device components: a. Incorporating animal or human cells/tissues/derivatives thereof, whether viable or non-viable; unless such devices are manufactured from or incorporate non-viable animal tissues or their derivatives that come in contact with intact skin only b. intended specifically to be used for sterilizing medical devices, or disinfecting as the prior/end point of processing c. intended specifically to be used for disinfecting, cleaning, rinsing or, when appropriate, hydrating contact lenses d. All contraceptive ancillary medical device components
10	**Question:** **What are the examples of medium-high risk medical devices?** Examples of medium-high risk medical devices are insulin prefilled pen/ syringes, intrauterine with hormone action, implant with hormone action, CAPD products with CAPD system (dialysate bag, drainage bag, transfer tubing, linking connector, disc, injection port, overpouch etc), drug eluting beads

11	**Question:** **What are the products that are excluded from the term combination product and will be regulated as drug product only?** The examples include: • Nasal spray with /without dosing control • Dropper for internal/external use, of which it is a part of the container/packaging • Eye/ear/nose drop packing • Applicator for skin/external body orifice (nostril, mouth, ear canal, anus and vaginal) without dosing control: e.g applicator for skin, vaginal, anus and ear canal • Nail brush
12	**Question:** **What are the products that are excluded from the term combination product and will be regulated separately?** Products that are excluded from the term combination product and will be regulated separately: i. A drug, device, or biological product packaged separately that according to its investigational plan or proposed labelling is intended for use only with an approved individually specified drug, device, or biological product where both are required to achieve the intended use, indication, or effect and where upon approval of the proposed product labelling of the approved product would need to be changed, e.g., to reflect a change in intended use, dosage form, strength, route of administration, or significant change in dose; or ii. Any investigational drug or device packaged separately that according to its proposed labelling is use only with another individually specified investigational drug, device, or cosmetic product where both are required to achieve the intended use, indication or effect. iii. Convenience pack product (example: first aid kit consists of medical device and non-scheduled poison product)

13	**Question:** **Will MDA establish a communication channel for manufacturer to submit the ancillary drug-medical device combination product dossier directly to MDA?** Answer: Yes
14	**Question:** **Is a risk analysis report that accounts for the finished drug-medical device combination product can be accepted by MDA?** Answer: Yes
15	**Question:** **Is IFU report that accounts for the finished drug-medical device combination product can be accepted by MDA?** Answer: Yes
16	**Question:** **What are the options that can to be included in Clinical Evaluation Report to address relevant safety and performance concerns regarding the drug-medical device combination product?** Answer: It may include the following information 1. Data on On-Market adverse event/safety data for combination product 2. Data on human factors study for the drug-medical device combination product 3. Excerpts from the drug CTD clinical overview for the combination products

17	**Question:** **Manufacturing Process as stated in the drug-medical device combination product dossier is already been approved by reference countries. Does the applicant have to submit the information to MDA for approval again?** Answer: The requirements on Manufacturing Process can ONLY be waived if the ancillary medical device is co-packaged together with its primary drug component **AND** received EC certification. A single entity drug-medical device combination product is required to include the Manufacturing Process information as outlined in the dossier.
18.	**Question:** **Is EU ERC (Essential Requirement Checklist) acceptable?** Answer: Yes
19.	**Question:** **What is the validity of the Endorsement Letter for ancillary component?** **Answer:** **Five (5) years.**