

Lennerz et al.,  
**A Unifying Force for the Realization of Medical AI**

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**Supplementary Table 1. Selected Regulatory Science Concepts Relevant to Artificial Intelligence and Software as a Medical Device**

Concept	Abbreviated Explanation	Reference
General Principles	General Principles of Software Validation	<a href="https://www.fda.gov/regulatory-information/search-fda-guidance-documents/general-principles-software-validation">https://www.fda.gov/regulatory-information/search-fda-guidance-documents/general-principles-software-validation</a> <a href="https://www.regulations.gov/document/FDA-1997-D-0029">https://www.regulations.gov/document/FDA-1997-D-0029</a>
Substantial equivalence	The 510(k) Program: Evaluating Substantial Equivalence in Premarket Notifications [510(k)]	<a href="#">Link to guidance</a>
Benefit Risk Assessments	Factors to Consider Regarding Benefit-Risk in Medical Device Product Availability, Compliance, and Enforcement Decisions	<a href="https://www.fda.gov/regulatory-information/search-fda-guidance-documents/factors-consider-regarding-benefit-risk-medical-device-product-availability-compliance-and">https://www.fda.gov/regulatory-information/search-fda-guidance-documents/factors-consider-regarding-benefit-risk-medical-device-product-availability-compliance-and</a>
Instructions for use (IFU)	IFU should contain detailed, action-oriented, step-by-step written and visual instructions provided	<a href="https://www.fda.gov/regulatory-information/search-fda-guidance-documents/instructions-use-patient-labeling-human-prescription-drug-and-biological-products-content-and-format">https://www.fda.gov/regulatory-information/search-fda-guidance-documents/instructions-use-patient-labeling-human-prescription-drug-and-biological-products-content-and-format</a>
CDRH Labeling Regulatory Requirements for Medical Devices	The U.S. Food and Drug Administration (FDA) develops and administers regulations under authority granted by laws passed by Congress that apply to food, drugs, cosmetics, biologics, radiation-emitting electronic products, and medical devices. Labeling regulations pertaining to medical devices are found in the following Parts of Title 21 of the Code of Federal Regulations (CFR). Older but highly informative guidance document Device Labeling	<a href="https://www.fda.gov/media/74034/download">https://www.fda.gov/media/74034/download</a> <a href="https://www.fda.gov/regulatory-information/search-fda-guidance-documents/guidance-medical-device-patient-labeling">https://www.fda.gov/regulatory-information/search-fda-guidance-documents/guidance-medical-device-patient-labeling</a>
Medical Device Labeling	General Device Labeling Use of Symbols In Vitro Diagnostic Products Investigational Device Exemptions Unique Device Identification Good Manufacturing Practices General Electronic Products	21 CFR Part 801 21 CFR Part 801.15 21 CFR Part 809 21 CFR Part 812 21 CFR Part 830 21 CFR Part 820 21 CFR Part 1010
Performance Assessment (example)	Technical Performance Assessment of Quantitative Imaging in Radiological Device Premarket Submissions	<a href="https://www.fda.gov/regulatory-information/search-fda-guidance-documents/technical-performance-assessment-quantitative-imaging-radiological-device-premarket-submissions">https://www.fda.gov/regulatory-information/search-fda-guidance-documents/technical-performance-assessment-quantitative-imaging-radiological-device-premarket-submissions</a>
Definition of label	Section 201(k)	<a href="https://www.fda.gov/medical-devices/overview-device-regulation/device-labeling">https://www.fda.gov/medical-devices/overview-device-regulation/device-labeling</a>
Medical Devices Technical Corrections Act (MDTCA)	Corrections and explanations	<a href="http://www.fda.gov/cdrh/mdtca/hrpt108-433.pdf">www.fda.gov/cdrh/mdtca/hrpt108-433.pdf</a>
Off-the Shelf Software	OTS Software in a medical device allows the manufacturer to concentrate on the application software needed to run device-specific functions. OTS Software intended for general-purpose computing may not be appropriate for a given specific use in a medical device. The medical device manufacturer using OTS Software generally gives up software life cycle control, but still bears the responsibility for the continued safe and effective performance of the medical device.	<a href="https://www.fda.gov/regulatory-information/search-fda-guidance-documents/shelf-software-use-medical-devices">https://www.fda.gov/regulatory-information/search-fda-guidance-documents/shelf-software-use-medical-devices</a>
Software Consensus Standards	Database provides the most up-to-date list of voluntary consensus standards to which FDA will accept a Declaration of Conformity	<a href="https://www.regulations.gov/document/FDA-2019-D-3598">https://www.regulations.gov/document/FDA-2019-D-3598</a> <a href="https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfsstandards/search.cfm">https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfsstandards/search.cfm</a>
Quality System Regulation	requirements for the establishment and maintenance of a quality management system	e.g., ISO 14971; AAMI SW68; DICOM <a href="https://www.dicomstandard.org/">https://www.dicomstandard.org/</a> 21 CFR Part 820; ISO 13485:2016; <a href="https://www.fda.gov/medical-devices/postmarket-requirements-devices/quality-system-qsr-regulation/medical-device-good-manufacturing-practices">https://www.fda.gov/medical-devices/postmarket-requirements-devices/quality-system-qsr-regulation/medical-device-good-manufacturing-practices</a>
Verification	Defined as means confirmation by examination and provision of objective evidence that specified requirements have been fulfilled. Walk-throughs, Various static and dynamic analyses, Code and document inspections, Module and level testing, Integration testing, Documentation	21 CFR 820.3(aa)
Validation / Design Validation	Defined as means establishing by objective evidence that device specifications (here software) conform with user needs and intended use(s). Planning, verification, traceability, configuration management, and many other aspects of good software engineering. Documentation	21 CFR 820.3(z)(2)
Process Validation	Process Validation is defined as the collection and evaluation of data, from the process design stage throughout production, which establishes scientific evidence that a process is capable of consistently delivering quality products.	21 CFR 820.3(z)(1)
The Least Burdensome Approach	Defined as the minimum amount of information necessary to adequately address a relevant regulatory question or issue through the most efficient manner at the right time	<a href="#">Link to guidance document</a>
Injuries / Serious Injuries	Definition of a serious injury is life threatening, or results in permanent impairment of a body function or permanent damage to a body structure; or necessitates medical or surgical intervention to preclude permanent impairment of a body function or permanent damage to a body structure.	21 CFR 803.3(bb)(1) and (2)
Level of Concern (Minor, Moderate, Major)	Level of Concern should be driven by the hazard analysis in the absence of mitigations, regardless of the effects of the mitigations on the individual hazards. Major if a failure or latent flaw could directly result in death or serious injury to the patient or operator. Moderate if a failure or latent design flaw could directly result in minor injury to the patient or operator. Minor if failures or latent design flaws are unlikely to cause any injury to the patient or operator.	<a href="https://www.regulations.gov/document/FDA-2020-D-0957">https://www.regulations.gov/document/FDA-2020-D-0957</a>
Documentation	device-specific guidance; design description of the device, documentation of how the design was implemented, demonstrate design implementation testing, identified hazards and managed risks, traceability to link design, implementation, testing, and risk management	<a href="https://www.regulations.gov/document/FDA-2020-D-0957">https://www.regulations.gov/document/FDA-2020-D-0957</a>
Software Description	comprehensive overview of the device features that are controlled by software, and describe the intended operational environment: programming language, hardware platform, operating system (if applicable), use of Off-the-Shelf software (if applicable)	<a href="https://www.regulations.gov/document/FDA-2020-D-0957">https://www.regulations.gov/document/FDA-2020-D-0957</a>
Device Hazard Analysis / Risk Management Summary	Identification of the hazardous event, severity of the hazard, cause(s) of the hazard, method of control (e.g., alarm, hardware design), corrective measures taken (including an explanation of the aspects of the device design/requirements that eliminate, reduce, or warn of a hazardous event), and verification that the method of control was implemented correctly	ISO 14971
Software Requirements Specification (SRS)	Hardware Requirements, Programming Language Requirements, Interface Requirements, Software Performance and Functional Requirements	<a href="https://www.regulations.gov/document/FDA-2020-D-0957">https://www.regulations.gov/document/FDA-2020-D-0957</a>
Revision Level History (Unresolved Anomalies (Bugs or Defects))	History of software revisions Problem, impact on device performance, any plans or timeframes for correcting the problem (where appropriate)	<a href="https://www.regulations.gov/document/FDA-2020-D-0957">https://www.regulations.gov/document/FDA-2020-D-0957</a> <a href="https://www.regulations.gov/document/FDA-2020-D-0957">https://www.regulations.gov/document/FDA-2020-D-0957</a>
Software Change Management	Design, development, testing, and version control of revisions to the software	<a href="https://www.regulations.gov/document/FDA-2020-D-0957">https://www.regulations.gov/document/FDA-2020-D-0957</a> <a href="https://www.regulations.gov/document/FDA-2016-D-2021">https://www.regulations.gov/document/FDA-2016-D-2021</a> <a href="https://www.regulations.gov/document/FDA-2016-D-2021">https://www.regulations.gov/document/FDA-2016-D-2021</a>
Change Management Biological Product	Changes to an Approved Application: Biological Products	<a href="https://www.fda.gov/regulatory-information/search-fda-guidance-documents/changes-approved-application-biological-products">https://www.fda.gov/regulatory-information/search-fda-guidance-documents/changes-approved-application-biological-products</a>
Change Management NDA/ANDA	Changes to an Approved NDA or ANDA	<a href="https://www.fda.gov/regulatory-information/search-fda-guidance-documents/changes-approved-nda-or-anda">https://www.fda.gov/regulatory-information/search-fda-guidance-documents/changes-approved-nda-or-anda</a>
Software of Unknown Pedigree (SOUP)	Software contained in a Software Device may have been obtained by the submitter from a third party	<a href="https://en.wikipedia.org/wiki/Software_of_unknown_pedigree">https://en.wikipedia.org/wiki/Software_of_unknown_pedigree</a>
Combined Products	Drug-device and biologics-device combinations	<a href="https://en.wikipedia.org/wiki/IEC_62304">https://en.wikipedia.org/wiki/IEC_62304</a> <a href="https://www.fda.gov/combination-products/about-combination-products/frequently-asked-questions-about-combination-products">https://www.fda.gov/combination-products/about-combination-products/frequently-asked-questions-about-combination-products</a>
Virus Protection Software	Antivirus products work by detecting, quarantining and/or deleting malicious code, to prevent malware from causing damage to your device. Modern antivirus products update themselves automatically, to provide protection against the latest viruses and other types of malware.	<a href="https://www.fda.gov/medical-devices/digital-health-center-excellence/cybersecurity">https://www.fda.gov/medical-devices/digital-health-center-excellence/cybersecurity</a>
Interfaces, Networking, and Network Infrastructure	Network infrastructure is the hardware and software that enables network connectivity and communication between users, devices, apps, and the internet.	<a href="https://www.fda.gov/files/about%20fda/published/Modernization_in_Action_2022.pdf">https://www.fda.gov/files/about%20fda/published/Modernization_in_Action_2022.pdf</a>
Architecture Design Chart	An architectural diagram is a visual representation that maps out the physical implementation for components of a software system. It shows the general structure of the software system and the associations, limitations, and boundaries between each element.	<a href="https://www.regulations.gov/document/FDA-2020-D-0957">https://www.regulations.gov/document/FDA-2020-D-0957</a>
Software Design Specification	A software design document—sometimes called software design specification—is a detailed plan for developing a piece of software. An SDD should outline the finished software's functionality (specs) and your team's plans to build it (timeline, goals, etc.).	<a href="https://www.regulations.gov/document/FDA-2020-D-0957">https://www.regulations.gov/document/FDA-2020-D-0957</a>
Traceability Analysis	The analysis of the relationships between two or more products of the development process conducted to determine that objectives have been met or that the effort represented by the products is completed.	<a href="https://www.regulations.gov/document/FDA-2020-D-0957">https://www.regulations.gov/document/FDA-2020-D-0957</a>
Software Development Environment Description	the development environment is a workspace with a set of processes and programming tools used to develop the source code for an application or software product.	<a href="https://www.regulations.gov/document/FDA-2020-D-0957">https://www.regulations.gov/document/FDA-2020-D-0957</a>
Submission Content	Content of Premarket Submissions for Device Software Functions	<a href="https://www.fda.gov/regulatory-information/search-fda-guidance-documents/content-premarket-submissions-device-software-functions">https://www.fda.gov/regulatory-information/search-fda-guidance-documents/content-premarket-submissions-device-software-functions</a>
Breakthrough designation	The Breakthrough Devices Program is a voluntary program for certain medical devices and device-led combination products that provide for more effective treatment or diagnosis of life-threatening or irreversibly debilitating diseases or conditions.	<a href="https://www.fda.gov/medical-devices/how-study-and-market-your-device/breakthrough-devices-program#1">https://www.fda.gov/medical-devices/how-study-and-market-your-device/breakthrough-devices-program#1</a>
Acceptance criteria/Specification	A specification is defined as a list of tests, references to analytical procedures, and appropriate acceptance criteria which are numerical limits, ranges, or other criteria for the tests described.	<a href="https://www.fda.gov/regulatory-information/search-fda-guidance-documents/q6b-specifications-test-procedures-and-acceptance-criteria-biotechnological-biological-products">https://www.fda.gov/regulatory-information/search-fda-guidance-documents/q6b-specifications-test-procedures-and-acceptance-criteria-biotechnological-biological-products</a>
Conformance to specifications	Conformance to specification means that when a device is tested according to the listed analytical procedures, will meet the acceptance criteria.	<a href="https://www.fda.gov/medical-devices/premarket-notification-510k/acceptance-checklists-510ks">https://www.fda.gov/medical-devices/premarket-notification-510k/acceptance-checklists-510ks</a>
Software as a Medical Device (SaMD)	Software, which on its own is a medical device – Software as a Medical Device – is one of three types of software related to medical devices.	<a href="https://www.fda.gov/medical-devices/digital-health-center-excellence/software-medical-device-samd">https://www.fda.gov/medical-devices/digital-health-center-excellence/software-medical-device-samd</a> <a href="https://pubmed.ncbi.nlm.nih.gov/31818387/">https://pubmed.ncbi.nlm.nih.gov/31818387/</a>
Artificial Intelligence and Machine Learning (AIML)-Enabled Medical Devices	As technology continues to advance every aspect of health care, software incorporating artificial intelligence (AI), and specifically the subset of AI known as machine learning (ML), has become an important part of an increasing number of medical devices.	<a href="https://www.fda.gov/medical-devices/software-medical-device-samd/artificial-intelligence-and-machine-learning-aiml-enabled-medical-devices">https://www.fda.gov/medical-devices/software-medical-device-samd/artificial-intelligence-and-machine-learning-aiml-enabled-medical-devices</a>

## Supplementary Table 2. Selected ISO Governance Approaches for Regulating Artificial Intelligence

### WORKING GROUPS

<a href="#">ISO/IEC JTC 1/SC 42/AG 3</a>	AI standardization roadmapping
<a href="#">ISO/IEC JTC 1/SC 42/AHG 1</a>	Dissemination and outreach
<a href="#">ISO/IEC JTC 1/SC 42/AHG 2</a>	Liaison with SC 38
<a href="#">ISO/IEC JTC 1/SC 42/AHG 4</a>	Liaison with SC 27
<a href="#">ISO/IEC JTC 1/SC 42/AHG 5</a>	AI standardization landscape and roadmap
<a href="#">ISO/IEC JTC 1/SC 42/JWG 1</a>	Joint Working Group ISO/IEC JTC1/SC 42 - ISO/IEC JTC1/SC 40: Governance implications of AI
<a href="#">ISO/IEC JTC 1/SC 42/JWG 2</a>	Joint Working Group ISO/IEC JTC1/SC 42 - ISO/IEC JTC1/SC 7 : Testing of AI-based systems
<a href="#">ISO/IEC JTC 1/SC 42/WG 1</a>	Foundational standards
<a href="#">ISO/IEC JTC 1/SC 42/WG 2</a>	Data
<a href="#">ISO/IEC JTC 1/SC 42/WG 3</a>	Trustworthiness
<a href="#">ISO/IEC JTC 1/SC 42/WG 4</a>	Use cases and applications
<a href="#">ISO/IEC JTC 1/SC 42/WG 5</a>	Computational approaches and computational characteristics of AI systems

### STANDARD AND/OR PROJECT

<a href="#">ISO/IEC DTS 4213.2</a>	Information technology — Artificial Intelligence — Assessment of machine learning classification performance
<a href="#">ISO/IEC AWI 5259-1</a>	Artificial intelligence — Data quality for analytics and machine learning (ML) — Part 1: Overview, terminology, and examples
<a href="#">ISO/IEC AWI 5259-2</a>	Artificial intelligence — Data quality for analytics and machine learning (ML) — Part 2: Data quality measures
<a href="#">ISO/IEC AWI 5259-3</a>	Artificial intelligence — Data quality for analytics and machine learning (ML) — Part 3: Data quality management requirements and guidelines
<a href="#">ISO/IEC AWI 5259-4</a>	Artificial intelligence — Data quality for analytics and machine learning (ML) — Part 4: Data quality process framework
<a href="#">ISO/IEC AWI 5259-5</a>	Artificial intelligence — Data quality for analytics and machine learning (ML) — Part 5: Data quality governance
<a href="#">ISO/IEC CD 5338</a>	Information technology — Artificial intelligence — AI system life cycle processes
<a href="#">ISO/IEC AWI 5339</a>	Information Technology — Artificial Intelligence — Guidelines for AI applications
<a href="#">ISO/IEC AWI 5392</a>	Information technology — Artificial intelligence — Reference architecture of knowledge engineering
<a href="#">ISO/IEC AWI TR 5469</a>	Artificial intelligence — Functional safety and AI systems
<a href="#">ISO/IEC AWI TS 5471</a>	Artificial intelligence — Quality evaluation guidelines for AI systems
<a href="#">ISO/IEC AWI TS 6254</a>	Information technology — Artificial intelligence — Objectives and approaches for explainability of ML models and AI systems
<a href="#">ISO/IEC CD 8183</a>	Information technology — Artificial intelligence — Data life cycle framework
<a href="#">ISO/IEC AWI TS 8200</a>	Information technology — Artificial intelligence — Controllability of automated artificial intelligence systems
<a href="#">ISO/IEC AWI TS 12791</a>	Information technology — Artificial intelligence — Treatment of unwanted bias in classification and regression machine learning tasks
<a href="#">ISO/IEC AWI 12792</a>	Information technology — Artificial intelligence — Transparency taxonomy of AI systems
<a href="#">ISO/IEC FDIS 22989</a>	Information technology — Artificial intelligence — Artificial intelligence concepts and terminology
<a href="#">ISO/IEC FDIS 23053</a>	Framework for Artificial Intelligence (AI) Systems Using Machine Learning (ML)
<a href="#">ISO/IEC DIS 23894</a>	Information technology — Artificial intelligence — Risk management
<a href="#">ISO/IEC CD 24029-2</a>	Artificial intelligence (AI) — Assessment of the robustness of neural networks — Part 2: Methodology for the use of formal methods
<a href="#">ISO/IEC AWI TR 24030</a>	Information technology — Artificial intelligence (AI) — Use cases
<a href="#">ISO/IEC DTR 24368</a>	Information technology — Artificial intelligence — Overview of ethical and societal concerns
<a href="#">ISO/IEC DIS 24668</a>	Information technology — Artificial intelligence — Process management framework for big data analytics
<a href="#">ISO/IEC CD 25059</a>	Software engineering — Systems and software Quality Requirements and Evaluation (SQuaRE) — Quality model for AI systems
<a href="#">ISO/IEC AWI TS 29119-11</a>	Information technology — Artificial intelligence — Testing for AI systems — Part 11:
<a href="#">ISO/IEC FDIS 38507</a>	Information technology — Governance of IT — Governance implications of the use of artificial intelligence by organizations
<a href="#">ISO/IEC CD 42001</a>	Information Technology — Artificial intelligence — Management system

Supplementary Table 3. Examples of AI-tools where the Addition of Regulatory Language and/or Concepts Resulted in Documented Improvements

No.	Publication	Promise, purpose, or quote	Source	Regulatory Concept	Disconnect	Evidence for Improvement by using Regulatory Science Terms	Source
1	<b>IBM Watson</b> <a href="#">wiki</a>	<ul style="list-style-type: none"> <li>• "AI-assisted screening process" for Diabetic Retinopathy (REF) (April 2020)</li> <li>• "Currently, there are no requirements for AI systems to be evaluated through observational clinical studies, nor is it common practice"</li> </ul>	<ul style="list-style-type: none"> <li><a href="#">ibm.com/redbook</a></li> <li><a href="#">ibm.com/redbook</a></li> </ul>	<ul style="list-style-type: none"> <li>• Intended use</li> </ul>	<ul style="list-style-type: none"> <li>• Intended use was poorly described</li> </ul>	<ul style="list-style-type: none"> <li>• Subsequent publications and strategy emphasize regulatory aspects</li> <li>• Clarification of functionality</li> <li>• IBM authors acknowledge critical role of regulatory aspects</li> <li>• IBM joins ÉCLAIR guidelines, prominently feature regulatory aspects</li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Conceptual Modeling</a></li> <li><a href="#">PMID: 34920529</a></li> <li><a href="#">PMID: 33463680</a></li> <li><a href="#">PMID: 33666696</a></li> </ul>
2	<b>Google</b> <a href="#">CHI paper</a>	<ul style="list-style-type: none"> <li>• "AI-assisted screening process" for Diabetic Retinopathy (April 2020)</li> <li>• "Currently, there are no requirements for AI systems to be evaluated through observational clinical studies, nor is it common practice"</li> </ul>	<ul style="list-style-type: none"> <li><a href="#">CHI paper</a></li> <li><a href="#">CHI paper</a></li> </ul>	<ul style="list-style-type: none"> <li>• Instructions for use</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Software as a Medical Device (SaMD) guidance (Dec 2018)</a></li> <li>• Miscommunication between computer science and regulatory team</li> <li>• <a href="#">European approach</a></li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Appropriate instructions for use can prevent some of the published mishaps</a></li> <li>• Concurrent google publication emphasize importance of regulatory aspects (May 2020)</li> <li>• Recognition of 'context of use'</li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Recommendations</a></li> <li><a href="#">Recommendations</a></li> <li><a href="#">Public comment</a></li> </ul>
3	<b>ROC curve</b> <a href="#">Use and Misuse</a>	<ul style="list-style-type: none"> <li>• AI tool to predict reportability of genetic variants</li> <li>• Performance reporting using ROC curve</li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Publication</a></li> <li><a href="#">Use and Misuse</a></li> </ul>	<ul style="list-style-type: none"> <li>• Indication of use (performance measures)</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Follow established statistical guidance</a></li> <li>• Statistical guidance exists but is not followed</li> </ul>	<ul style="list-style-type: none"> <li>• "...Improvements to objectivity and reproducibility..."</li> <li>• "...biases may exist in our model with regard to (...) the ethnicity or ancestry of our testing"</li> </ul>	<ul style="list-style-type: none"> <li><a href="#">PMID: 34979564</a></li> <li><a href="#">PMID: 30364844</a></li> </ul>
4	<b>FDA 20 case studies</b> <a href="#">Evidence</a>	<ul style="list-style-type: none"> <li>• Algorithmic analysis for ovarian cancer screening</li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Evidence</a></li> <li><a href="#">PMID: 12795817</a></li> </ul>	<ul style="list-style-type: none"> <li>• Performance measures</li> <li>• Indication of use (Target population)</li> <li>• Mitigation strategy</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Follow established statistical guidance</a></li> <li>• <a href="#">Not reported (i.e., proprietary)</a></li> <li>• <a href="#">PMID: 14996856</a></li> <li>• Not included</li> </ul>	<ul style="list-style-type: none"> <li>• FDA authorized test available</li> <li>• "Software algorithm that combines five immunoassays into a single score"</li> <li>• One equation with 2 cut-offs by menopausal status</li> <li>• Should not be used without an independent clinical and imaging evaluation</li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Decision summary</a></li> <li><a href="#">Decision summary</a></li> <li><a href="#">Decision summary</a></li> <li><a href="#">Decision summary</a></li> </ul>

**Supplementary Table 4. Established Interdisciplinary Strategies to Address Regulatory Challenges**

Aspect	Approach	Reference/Source
<b>Review Teams</b>	The FDA and EMA review teams involve team members from different disciplines working collaboratively, with a common purpose, to set goals, make decisions and share resources and responsibilities.	<a href="https://www.fda.gov/industry/fda-basics-industry/guidelines">https://www.fda.gov/industry/fda-basics-industry/guidelines</a>
		<a href="https://www.fda.gov/medical-devices/guidance-documents-medical-devices-and-radiation-emitting-products/class-ii-special-controls-documents">https://www.fda.gov/medical-devices/guidance-documents-medical-devices-and-radiation-emitting-products/class-ii-special-controls-documents</a>
		<a href="https://www.ema.europa.eu/en/committees/how-committees-work">https://www.ema.europa.eu/en/committees/how-committees-work</a>
<b>Guidance creation</b>	The creation of a guidance document follows very specific paradigms that entails multiple steps that go beyond the input from immediate subject matter experts. For example, there is an intricate intra-agency review and approval process. Furthermore, the guidance document is released as a draft guidance with a public commenting period.	<a href="#">Link to FDA SOP</a>
<b>Research by the regulators</b>	The FDA performs scientific research (e.g., Office of Science and Engineering Laboratories)	<a href="https://www.fda.gov/about-fda/cdoh-offices/office-science-and-engineering-laboratories">https://www.fda.gov/about-fda/cdoh-offices/office-science-and-engineering-laboratories</a>
<b>Example NCTR</b>	<b>National Center for Toxicological Research Focus Areas</b>	<a href="https://www.fda.gov/about-fda/science-research/nctr/nctr-research-focus-areas">https://www.fda.gov/about-fda/science-research/nctr/nctr-research-focus-areas</a>
	Artificial Intelligence	<a href="https://www.fda.gov/about-fda/nctr-research-focus-areas/artificial-intelligence">https://www.fda.gov/about-fda/nctr-research-focus-areas/artificial-intelligence</a>
	Systems Biology	<a href="https://www.fda.gov/about-fda/nctr-research-offices-and-divisions/nctr-division-systems-biology">https://www.fda.gov/about-fda/nctr-research-offices-and-divisions/nctr-division-systems-biology</a>
	Bio-Imaging	<a href="https://www.fda.gov/about-fda/nctr-research-focus-areas/bio-imaging">https://www.fda.gov/about-fda/nctr-research-focus-areas/bio-imaging</a>
	Nanotechnology	<a href="https://www.fda.gov/about-fda/nctr-research-focus-areas/nanotechnology">https://www.fda.gov/about-fda/nctr-research-focus-areas/nanotechnology</a>
	Perinatal and Maternal Research at NCTR	<a href="https://www.fda.gov/about-fda/nctr-research-focus-areas/perinatal-and-maternal-research">https://www.fda.gov/about-fda/nctr-research-focus-areas/perinatal-and-maternal-research</a>
	Personalized Medicine	<a href="https://www.fda.gov/about-fda/nctr-research-offices-and-divisions/nctr-division-systems-biology">https://www.fda.gov/about-fda/nctr-research-offices-and-divisions/nctr-division-systems-biology</a>
	NCTR bioinformatics tools	<a href="https://www.fda.gov/science-research/bioinformatics-tools">https://www.fda.gov/science-research/bioinformatics-tools</a>
	<b>Regulatory Science Training</b>	<a href="https://www.fda.gov/about-fda/nctr-research-focus-areas/regulatory-science-training">https://www.fda.gov/about-fda/nctr-research-focus-areas/regulatory-science-training</a>
	Facility Research Program (NCTR)	<a href="https://www.fda.gov/about-fda/scientific-interships-fellowships/trainees-and-non-us-citizens/facility-research-program-nctr">https://www.fda.gov/about-fda/scientific-interships-fellowships/trainees-and-non-us-citizens/facility-research-program-nctr</a>
	Foreign National Training Program (NCTR)	<a href="https://www.fda.gov/about-fda/scientific-interships-fellowships/trainees-and-non-us-citizens/foreign-national-training-program-nctr">https://www.fda.gov/about-fda/scientific-interships-fellowships/trainees-and-non-us-citizens/foreign-national-training-program-nctr</a>
	Interdisciplinary Toxicology Program	<a href="https://www.fda.gov/about-fda/scientific-interships-fellowships/trainees-and-non-us-citizens/interdisciplinary-toxicology-program">https://www.fda.gov/about-fda/scientific-interships-fellowships/trainees-and-non-us-citizens/interdisciplinary-toxicology-program</a>
	Postgraduate Research Program (NCTR)	<a href="https://www.fda.gov/about-fda/scientific-interships-fellowships/trainees-and-non-us-citizens/postgraduate-research-program-nctr">https://www.fda.gov/about-fda/scientific-interships-fellowships/trainees-and-non-us-citizens/postgraduate-research-program-nctr</a>
	Science Internship Program (NCTR)	<a href="https://www.fda.gov/about-fda/scientific-interships-fellowships/trainees-and-non-us-citizens/science-internship-program-nctr">https://www.fda.gov/about-fda/scientific-interships-fellowships/trainees-and-non-us-citizens/science-internship-program-nctr</a>
	Summer Student Research Program (NCTR)	<a href="https://www.fda.gov/about-fda/scientific-interships-fellowships/trainees-and-non-us-citizens/summer-student-research-program-nctr">https://www.fda.gov/about-fda/scientific-interships-fellowships/trainees-and-non-us-citizens/summer-student-research-program-nctr</a>
Graduate Certificate in Regulatory Science	<a href="https://publichealth.uams.edu/academics/certificate-in-regulatory-science/">https://publichealth.uams.edu/academics/certificate-in-regulatory-science/</a>	
<b>Example OSEL</b>	The Office of Science and Engineering Laboratories (OSEL) is composed of scientists and engineers who have a broad diversity of expertise from microbiology to artificial intelligence and machine learning. We are all dedicated to promoting innovation for the development of new lifesaving medical devices.	<a href="https://www.fda.gov/about-fda/cdoh-offices/office-science-and-engineering-laboratories">https://www.fda.gov/about-fda/cdoh-offices/office-science-and-engineering-laboratories</a>
<b>Example ARHQ</b>	Additive Manufacturing	<a href="https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/additive-manufacturing-program-research-additive-manufacturing-medical-devices">https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/additive-manufacturing-program-research-additive-manufacturing-medical-devices</a>
	Artificial Intelligence and Machine Learning (AI/ML)	<a href="https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/biocompatibility-and-toxicology-program-research-artificial-intelligence-and-machine-learning-program-research-ai-and-biomed-medical-devices">https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/biocompatibility-and-toxicology-program-research-artificial-intelligence-and-machine-learning-program-research-ai-and-biomed-medical-devices</a>
	Biocompatibility and Toxicology	<a href="https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/biocompatibility-and-toxicology-program-research-artificial-intelligence-and-machine-learning-program-research-ai-and-biomed-medical-devices">https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/biocompatibility-and-toxicology-program-research-artificial-intelligence-and-machine-learning-program-research-ai-and-biomed-medical-devices</a>
	Cardiovascular	<a href="https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/cardiovascular-program-research-cardiovascular-medical-devices">https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/cardiovascular-program-research-cardiovascular-medical-devices</a>
	Credibility of Computational Models	<a href="https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/credibility-of-computational-models-program-research-computational-models-and-simulation-associated">https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/credibility-of-computational-models-program-research-computational-models-and-simulation-associated</a>
	Digital Pathology	<a href="https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/digital-pathology-program-research-digital-pathology-medical-devices">https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/digital-pathology-program-research-digital-pathology-medical-devices</a>
	Electromagnetic and Electrical Safety	<a href="https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/electromagnetic-and-electrical-safety-program-research-electromagnetic-and-electrical-safety-medical">https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/electromagnetic-and-electrical-safety-program-research-electromagnetic-and-electrical-safety-medical</a>
	Emergency Preparedness	<a href="https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/emergency-preparedness-program-research-medical-devices-emergencies">https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/emergency-preparedness-program-research-medical-devices-emergencies</a>
	Human Device Interaction	<a href="https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/human-device-interaction-program-research-human-interaction-medical-devices">https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/human-device-interaction-program-research-human-interaction-medical-devices</a>
	Materials Performance	<a href="https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/materials-performance-program-research-materials-performance-medical-devices">https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/materials-performance-program-research-materials-performance-medical-devices</a>
	Medical Extended Reality	<a href="https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/medical-extended-reality-program-research-medical-extended-reality-based-medical-devices">https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/medical-extended-reality-program-research-medical-extended-reality-based-medical-devices</a>
	Medical Imaging and Diagnostics	<a href="https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/medical-imaging-and-diagnostics-program-research-medical-imaging-and-diagnostics">https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/medical-imaging-and-diagnostics-program-research-medical-imaging-and-diagnostics</a>
	Microbiology and Infection Control	<a href="https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/microbiology-and-infection-control-program-research-microbial-and-infection-control-medical-devices">https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/microbiology-and-infection-control-program-research-microbial-and-infection-control-medical-devices</a>
	Microfluidics	<a href="https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/microfluidics-program-research-microfluidics-based-medical-devices">https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/microfluidics-program-research-microfluidics-based-medical-devices</a>
	Neurology	<a href="https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/neurology-program-research-neurology-medical-devices">https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/neurology-program-research-neurology-medical-devices</a>
Ophthalmology	<a href="https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/ophthalmology-program-research-ophthalmology-medical-devices">https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/ophthalmology-program-research-ophthalmology-medical-devices</a>	
Orthopedic Devices	<a href="https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/orthopedic-devices-program-research-orthopedic-medical-devices">https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/orthopedic-devices-program-research-orthopedic-medical-devices</a>	
Patient Monitoring and Control	<a href="https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/patient-monitoring-and-control-program-research-patient-monitoring-and-control-devices">https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/patient-monitoring-and-control-program-research-patient-monitoring-and-control-devices</a>	
Therapeutic Ultrasound	<a href="https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/therapeutic-ultrasound-program-research-therapeutic-ultrasound-medical-devices">https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/therapeutic-ultrasound-program-research-therapeutic-ultrasound-medical-devices</a>	
<b>OSEL Divisions</b>	<a href="https://www.fda.gov/about-fda/cdoh-offices/office-science-and-engineering-laboratories">https://www.fda.gov/about-fda/cdoh-offices/office-science-and-engineering-laboratories</a>	
Division of Applied Mechanics (DAM)	<a href="https://www.fda.gov/about-fda/cdoh-offices/division-applied-mechanics">https://www.fda.gov/about-fda/cdoh-offices/division-applied-mechanics</a>	
Division of Biomedical Physics (DBP)	<a href="https://www.fda.gov/about-fda/cdoh-offices/division-biomedical-physics">https://www.fda.gov/about-fda/cdoh-offices/division-biomedical-physics</a>	
Division of Biology, Chemistry, and Materials Science (DBCMS)	<a href="https://www.fda.gov/about-fda/cdoh-offices/division-biology-chemistry-and-materials-science">https://www.fda.gov/about-fda/cdoh-offices/division-biology-chemistry-and-materials-science</a>	
Division of Imaging, Diagnostics, and Software Reliability (DISDR)	<a href="https://www.fda.gov/about-fda/cdoh-offices/division-imaging-diagnostics-and-software-reliability">https://www.fda.gov/about-fda/cdoh-offices/division-imaging-diagnostics-and-software-reliability</a>	
The Agency for Healthcare Research and Quality's (AHRQ) mission is to produce evidence to make health care safer, higher quality, more accessible, equitable, and affordable, and to work within the U.S. Department of Health and Human Services and with other partners to make sure that the evidence is understood and used. We accomplish our mission by focusing on our three core competencies.	<a href="https://www.ahrq.gov/">https://www.ahrq.gov/</a>	
<b>Regulatory Resources</b>		
Guidance database	<a href="https://www.fda.gov/regulatory-information/search-fda-guidance-documents">https://www.fda.gov/regulatory-information/search-fda-guidance-documents</a>	
Artificial Intelligence and Machine Learning (AI/ML) Software as a Medical Device Action Plan	<a href="https://www.fda.gov/medical-devices/software-medical-device-samd/artificial-intelligence-and-machine-learning-software-medical-device">https://www.fda.gov/medical-devices/software-medical-device-samd/artificial-intelligence-and-machine-learning-software-medical-device</a>	
Artificial Intelligence and Machine Learning (AI/ML)-Enable Medical Devices	<a href="https://www.fda.gov/medical-devices/software-medical-device-samd/artificial-intelligence-and-machine-learning-ai-ml-enabled-medical-devices">https://www.fda.gov/medical-devices/software-medical-device-samd/artificial-intelligence-and-machine-learning-ai-ml-enabled-medical-devices</a>	
Deciding When to Submit a 510(k) for a Software Change to an Existing Device	<a href="#">Link to guidance</a>	
<b>An FDA Artificial Intelligence (AI) Program for Toxicology at NCTR</b>	<a href="https://www.fda.gov/about-fda/nctr-research-focus-areas/artificial-intelligence">https://www.fda.gov/about-fda/nctr-research-focus-areas/artificial-intelligence</a>	
AnimalGAN	<a href="https://www.fda.gov/about-fda/nctr-research-focus-areas/animalgan-initiative">https://www.fda.gov/about-fda/nctr-research-focus-areas/animalgan-initiative</a>	
SafetAI	<a href="https://www.fda.gov/about-fda/nctr-research-focus-areas/safetai-initiative">https://www.fda.gov/about-fda/nctr-research-focus-areas/safetai-initiative</a>	
BERTox	<a href="https://www.fda.gov/about-fda/nctr-research-focus-areas/ber-tox-initiative">https://www.fda.gov/about-fda/nctr-research-focus-areas/ber-tox-initiative</a>	
Pathology4	<a href="https://www.fda.gov/about-fda/nctr-research-focus-areas/pathology-initiative">https://www.fda.gov/about-fda/nctr-research-focus-areas/pathology-initiative</a>	
Medical Device Databases	<a href="https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/medical-device-databases">https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/medical-device-databases</a>	
FDA product code classification database	<a href="https://www.fda.gov/medical-devices/classify-your-medical-device/product-code-classification-database">https://www.fda.gov/medical-devices/classify-your-medical-device/product-code-classification-database</a>	
Catalogue of Regulatory Science Tools	<a href="https://www.fda.gov/medical-devices/science-and-research-medical-devices/catalog-regulatory-science-tools-help-assess-new-medical-devices">https://www.fda.gov/medical-devices/science-and-research-medical-devices/catalog-regulatory-science-tools-help-assess-new-medical-devices</a>	
Multi-Reader, Multi-Case Analysis Methods (MRMC)	<a href="https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/multi-reader-multi-case-analysis-methods-mr-mc">https://www.fda.gov/medical-devices/medical-device-regulatory-science-research-programs-conducted-osel/multi-reader-multi-case-analysis-methods-mr-mc</a>	
Software as a Medical Device (SaMD)	<a href="https://www.fda.gov/medical-devices/digital-health-center-excellence/software-medical-device-samd">https://www.fda.gov/medical-devices/digital-health-center-excellence/software-medical-device-samd</a>	
Structured Product Labeling Commercial Software and Conversion Vendors and FDA-Regulated Company	<a href="https://www.fda.gov/industry/fda-data-standards-advisory-board/structured-product-labeling-resources">https://www.fda.gov/industry/fda-data-standards-advisory-board/structured-product-labeling-resources</a>	
Self-Generated SPL Software		
Device Software Functions Including Mobile Medical Applications	<a href="https://www.fda.gov/medical-devices/digital-health-center-excellence/device-software-functions-including-mobile-medical-applications">https://www.fda.gov/medical-devices/digital-health-center-excellence/device-software-functions-including-mobile-medical-applications</a>	
Medicines and Healthcare Products Regulatory Agency (MHRA), software flow chart	<a href="#">Link to flowchart</a>	
<b>Programs and Initiatives (Selection)</b>		
The Medical Device Development Tool (MDDT) program	<a href="https://www.fda.gov/medical-devices/medical-device-development-tools-mddt">https://www.fda.gov/medical-devices/medical-device-development-tools-mddt</a>	
Network of Expert (NoE)	<a href="https://www.fda.gov/about-fda/center-devices-and-radiological-health/network-experts-program-connecting-fda-external-experts">https://www.fda.gov/about-fda/center-devices-and-radiological-health/network-experts-program-connecting-fda-external-experts</a>	
Digital Health Center of Excellence (DHCe)	<a href="https://www.fda.gov/medical-devices/digital-health-center-excellence">https://www.fda.gov/medical-devices/digital-health-center-excellence</a>	
The Medical Device Innovation Consortium (MDIC)	<a href="https://mdic.org/">https://mdic.org/</a>	
Critical Path Innovation Meetings (CPIM)	<a href="https://www.fda.gov/drugs/new-drugs-fda-cders-new-molecular-entities-and-new-therapeutic-biological-products/critical-path-innovation-meetings-cpim">https://www.fda.gov/drugs/new-drugs-fda-cders-new-molecular-entities-and-new-therapeutic-biological-products/critical-path-innovation-meetings-cpim</a>	
<b>Collaborative Communities</b>	The FDA currently participates as a member of several collaborative communities, which have been established and are managed and controlled by external stakeholders.	<a href="https://www.fda.gov/about-fda/cdoh-strategic-priorities-and-updates/collaborative-communities-addressing-health-care-challenges-together">https://www.fda.gov/about-fda/cdoh-strategic-priorities-and-updates/collaborative-communities-addressing-health-care-challenges-together</a>
ToolKit	<a href="https://www.fda.gov/oc/2017/01/16/0116467/download">https://www.fda.gov/oc/2017/01/16/0116467/download</a>	
Collaborative Community on Ophthalmic Imaging	<a href="https://ccoi.org/">https://ccoi.org/</a>	
National Evaluation System for health Technology Coordinating Center (NESTcc) Collaborative Community	<a href="https://nestcc.net/nestcc-one-of-the-first-collaborative-communities-with-fda-participation/">https://nestcc.net/nestcc-one-of-the-first-collaborative-communities-with-fda-participation/</a>	
Standardizing Laboratory Practices in Pharmacogenomics Initiative (STRIPe) Collaborative Community	<a href="https://www.storadr.org/strip">https://www.storadr.org/strip</a>	
International Liquid Biopsy Standardization Alliance (ILSA)	<a href="https://ilhs.org/four-programs/biomarkers-consortium/programs/ilsa">https://ilhs.org/four-programs/biomarkers-consortium/programs/ilsa</a>	
Xavier Artificial Intelligence (AI) World Consortium	<a href="https://www.xavierhealth.org/ai-summit-registration/">https://www.xavierhealth.org/ai-summit-registration/</a>	
Case for Quality Collaborative Community	<a href="https://mdic.org/programs/case-for-quality/">https://mdic.org/programs/case-for-quality/</a>	
Heart Valve Collaboratory (HVC)	<a href="https://www.heartvalvecollaboratory.org/">https://www.heartvalvecollaboratory.org/</a>	
Wound Care Collaborative Community	<a href="https://www.woundcarecc.org/">https://www.woundcarecc.org/</a>	
Pathology Innovation Collaborative Community (PICC)	<a href="https://pathologyinnovation.org/">https://pathologyinnovation.org/</a>	
RESOLVE (REDUCING SUICIDE Rates Amongst Individuals with Diabetes) Collaborative Community	<a href="https://www.researchdiabetes.com">https://www.researchdiabetes.com</a>	
MedTech Color Collaborative Community	<a href="https://medtechcolor.org/collaborative-community/">https://medtechcolor.org/collaborative-community/</a>	
Digital Health Measurement Collaborative Community (DATacc)	<a href="https://datacc.dimesociety.org/">https://datacc.dimesociety.org/</a>	