

INTRODUCTION

Welcome



Design Change Control Process

CLICK THE FORWARD
ARROW TO BEGIN.



INTRODUCTION

Objectives



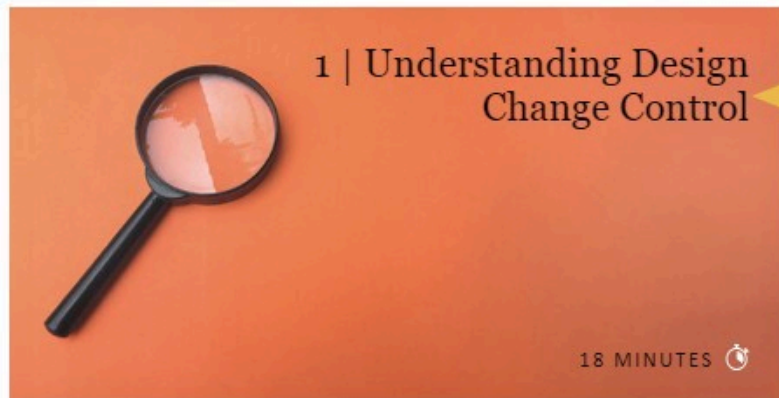
Upon completion of this course, you will be able to:

- Explain what design change controls are and why they are important,
- Distinguish between ADC's design change control processes, and
- Know where to go if you have questions or concerns.



INTRODUCTION

Menu



1 | Understanding Design Change Control

18 MINUTES ⌚

Click the panel to get started.



3 | Knowledge Check

5 MINUTES ⌚



2 | Design Change Process

2 MINUTES ⌚

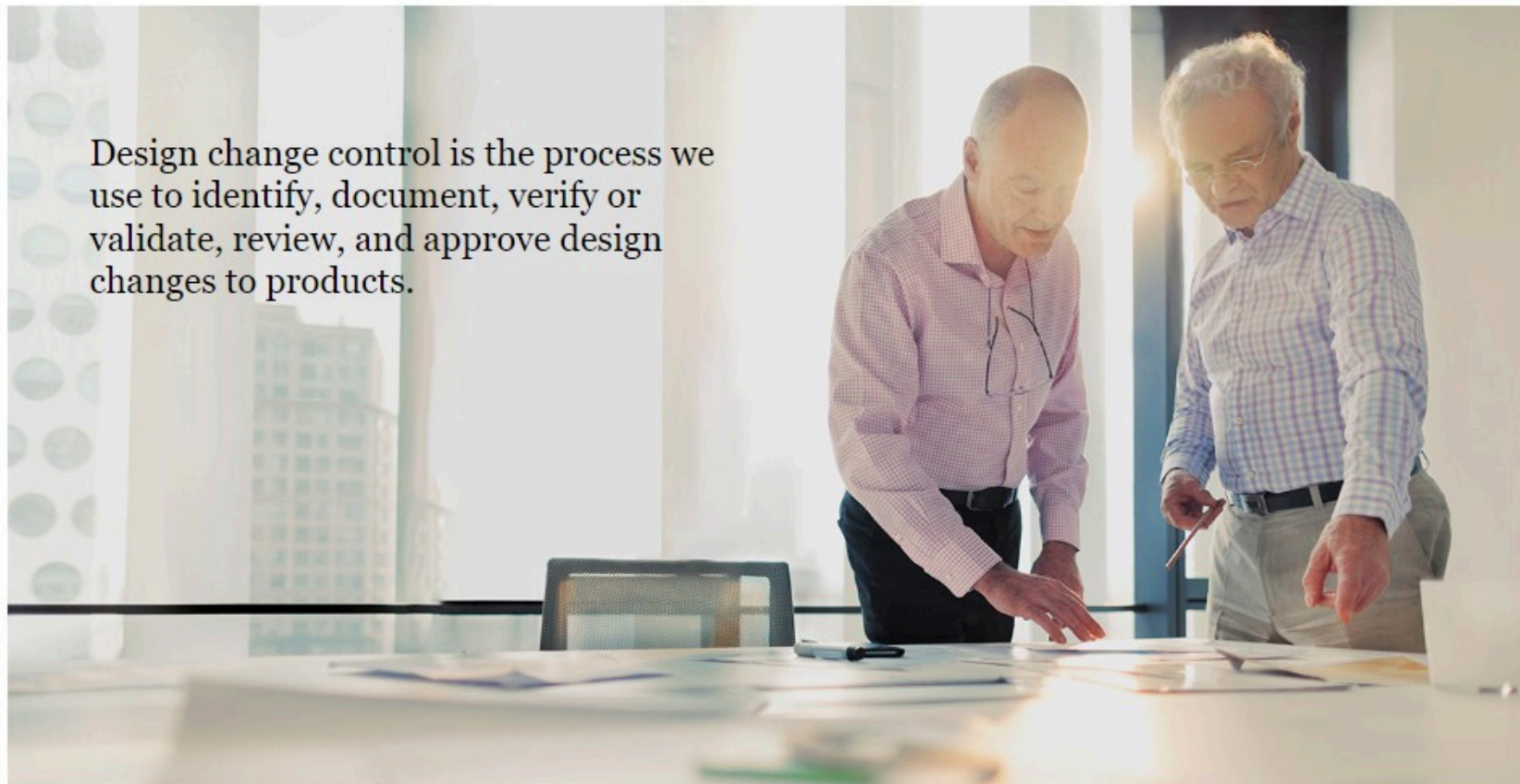


UNDERSTANDING DESIGN CHANGE CONTROL

What is Design Change Control

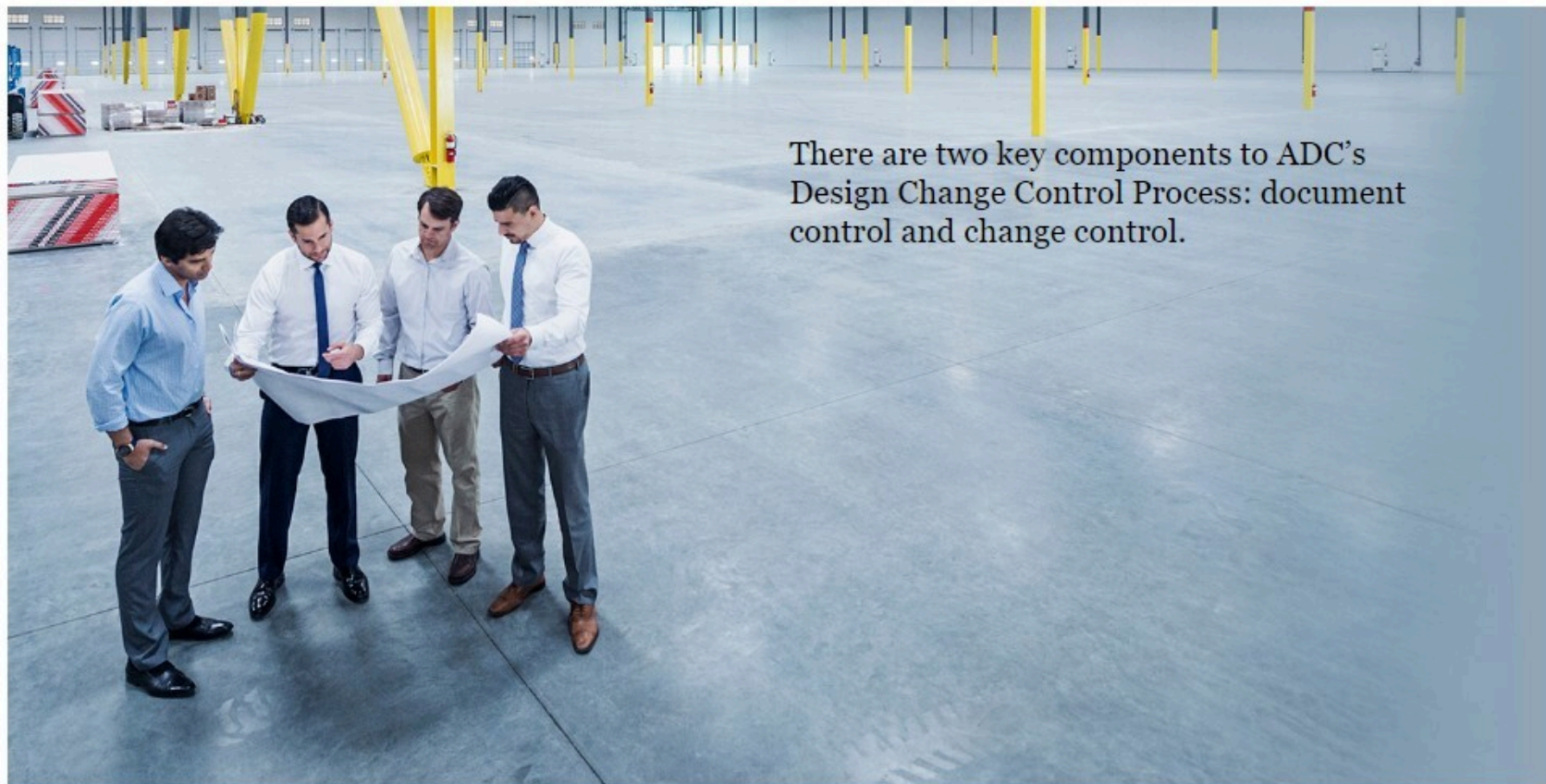


Design change control is the process we use to identify, document, verify or validate, review, and approve design changes to products.



UNDERSTANDING DESIGN CHANGE CONTROL

What is Design Change Control



What is Design Change Control



Document control is the process we use to enumerate design documents, and track their status and revision history.

The term “document” is inclusive to mean all design documents, drawings, and other items of design input or output which characterize the design or some aspect of it.



UNDERSTANDING DESIGN CHANGE CONTROL

What is Design Change Control



Change Control is the process we use to enumerate changes following a standardized set of procedures, which identify the documents to be revised with a summary and justification of the changes.



UNDERSTANDING DESIGN CHANGE CONTROL

What is Design Change Control



If a proposed design change impacts any part of an on-market or in development device master record or a manufacturing process, ADC requires following the Design Change Control Process.



UNDERSTANDING DESIGN CHANGE CONTROL

What is Design Change Control



The aim of the Design Change Control Process is to review, approve, and document design changes, the impact of those changes, the change plan, and deliverables before the change is made.



UNDERSTANDING DESIGN CHANGE CONTROL

Roles and Responsibilities



Depending on the nature of the change, and where and when in the process it occurs, the Design Change Control Process requires varying degrees of effort, and input from a variety of functions across the organization.

CLICK EACH OF THE PANELS TO LEARN ABOUT THE RESPONSIBILITIES OF THOSE INVOLVED IN THE DESIGN CHANGE CONTROL PROCESS.



UNDERSTANDING DESIGN CHANGE CONTROL

Roles and Responsibilities



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CHANGE INITIATOR

The Change Initiator is the individual responsible for identifying a change and providing a summary and justification for it. The Change Initiator collaborates with the Change Team, as needed, to determine the appropriate change management methods and requirements. Once identified, the Change Initiator is responsible for managing and verifying the completion of the activities associated with the change.

In the case of product changes, the Change Initiator is typically the Research and Development Program Manager.

CHANGE I

CHANGE OVERSIGHT BOARD (COB)

OTHER KEY FUNCTIONS



UNDERSTANDING DESIGN CHANGE CONTROL

Roles and Responsibilities



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CHANGE TEAM

The Change Team is responsible for evaluating and documenting the impact of the change. The Team may include members from multiple functional areas (such as Regulatory Affairs, Quality Assurance, Research and Development, and Operations), as well as individuals representing multiple ADC sites.

CHANGE I

CHANGE OVERSIGHT BOARD (COB)

OTHER KEY FUNCTIONS



UNDERSTANDING DESIGN CHANGE CONTROL

Roles and Responsibilities



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CHANGE OVERSIGHT BOARD (COB)

The COB is a cross-functional team that provides review and approval of the change plans. All COB members are responsible for:

- Confirming that impacted product lines are correctly selected,
- Confirming how the change is to be managed including documentation of regulatory / compliance impacts to change implementation.
- Confirming that all actions are complete or a method to track remaining actions is identified.

CHANGE OVERSIGHT BOARD (COB)

OTHER KEY FUNCTIONS



UNDERSTANDING DESIGN CHANGE CONTROL

Roles and Responsibilities



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OTHER KEY FUNCTIONS

The R&D team is responsible for evaluating the impact of the change on all elements of the design history file and ensuring all technical input is considered during the assessment.

Operations team members assist with the evaluation of the impact on design transfer activities or the manufacturing process.

Quality Assurance is responsible for determining the change impact on product compliance and ensuring Quality Assurance requirements are addressed, including external partner notifications, economic partner notification, and verifying that the DHF and DMR have been updated.

Regulatory Affairs is responsible for ensuring Regulatory approval of the proposed change, including assessing the impact on regulatory submissions, technical files, and product registrations.

CHANGE I

CHANGE OVERSIGHT BOARD (COB)

OTHER KEY FUNCTIONS



Categories of Design Change



At ADC, design changes fall into one of four categories.

Each category of change requires the Change Initiator and the Change Team to follow a different process when identifying, documenting, reviewing, approving and reporting on the impacts of the change.

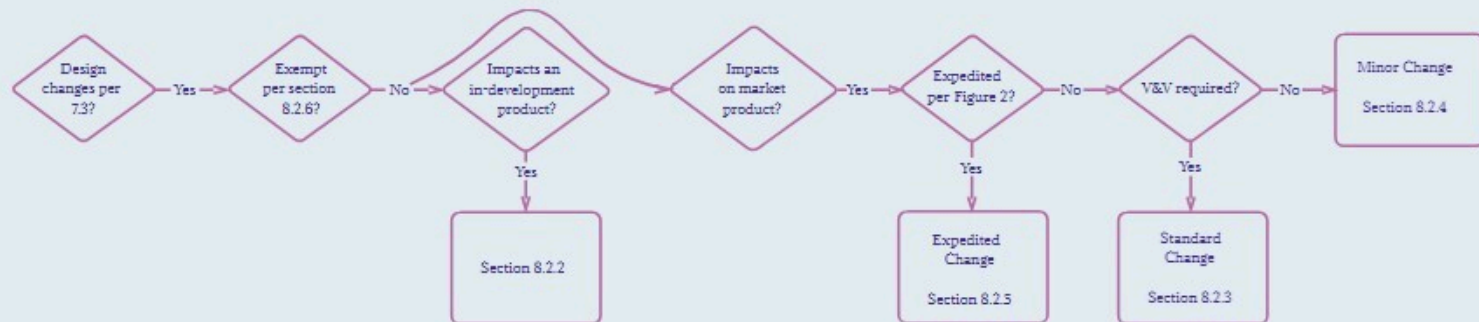


1. Standard Change.
2. Expedited Change.
3. Minor Change.
4. In development Change.



UNDERSTANDING DESIGN CHANGE CONTROL

Categories of Design Change



The flow-chart onscreen is a job aid that can be used to determine the category of change required.

Change Teams are encouraged to carefully consider the scope of any change and its impact in order to correctly determine the category of design change required. As you will learn in the next section, each change category has a different set of requirements.



Review



Review

Take a moment to review some of the key concepts in this section.

Click the arrow to begin your review.



Review



Design Change Control Defined

Design change control is the process we use to identify, document, verify or validate, review, and approve design changes to products.



Review



Roles and Responsibilities

Depending on the nature of the change, and where and when in the process it occurs, the Design Change Control Process requires varying degrees of effort, and input from a variety of functions across the organization.



Review



Categories of Change

At ADC, design changes fall into one of four categories:

- Standard Change
- Expedited Change
- Minor Change
- In-development Change



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To check your progress, click
the Menu button



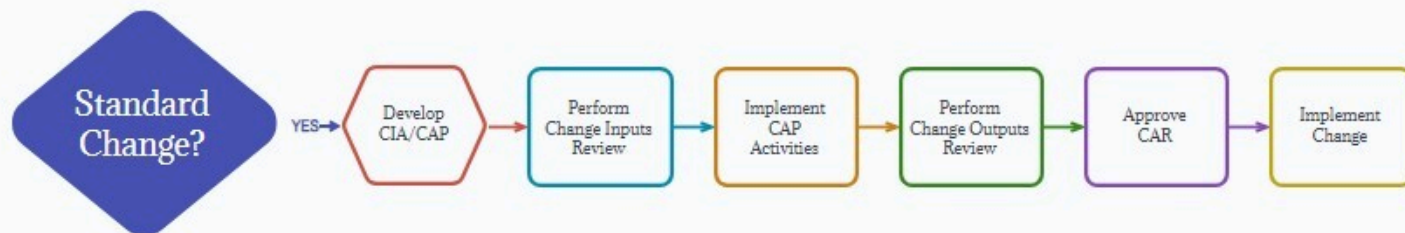
You have completed section 1 of 3

CLICK THE FORWARD ARROW TO CONTINUE LEARNING



DESIGN CHANGE PROCESS

Standard Change Process



The Standard Change Process is used whenever a change is determined to:

- Impact on-market products, and
- Require the completion of design verification or validation.

If a change does not require completion of design verification or validation, it may be categorized as a minor change.



DESIGN CHANGE PROCESS

Standard Change Process



The first step in the Standard Change Process is the development of a change action plan (CAP).

The CAP outlines:

- The scope of the change,
- The justification for the change,
- All impacts of the change, and
- Activities to be completed before the change is implemented.

The CAP may also outline a phased implementation of the change, or may identify coordination required with other in-process CAPs.

A template is available to support the creation of the CAP – see 7.3W06 for details.



DESIGN CHANGE PROCESS

Standard Change Process



The CAP also contains the change impact assessment (CIA), which assess the impacts to product lines, all 7.3 (design control deliverables), regulatory registration or submission, and several other considerations, including:

- Other products, processes, or sites
- External partners
- Economic operator verification
- Data privacy
- Materials
- Quality management system
- Clinical and post-market surveillance plans



DESIGN CHANGE PROCESS

Standard Change Process



Once all activities required to implement the change have been documented in the CAP, the Change Oversight Board (COB) reviews and approves the CAP.

The COB confirms that all impacts of the change have been documented and that the strategy and activities identified are sufficient to manage the change.



DESIGN CHANGE PROCESS

Standard Change Process



Once approved, the Change Initiator collaborates with the Change Team to implement the CAP activities.

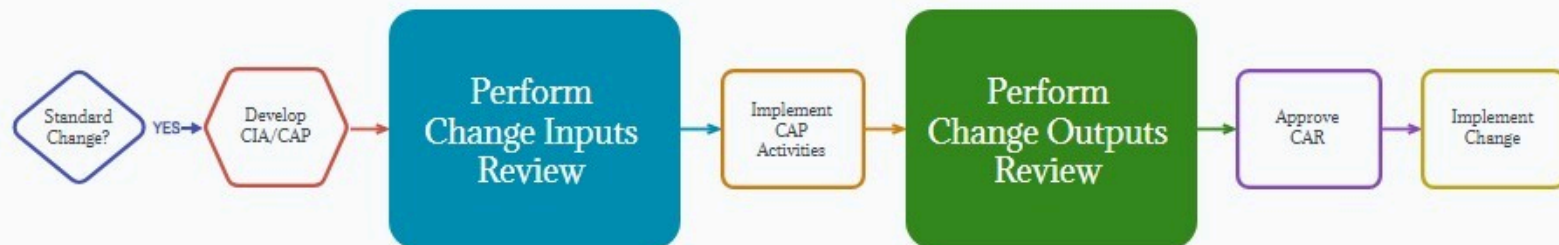
Activities may include:

- The execution of V&V test cases or protocols and the obtaining of test results.
- Regulatory submissions, changes to product registrations, or updates or technical files.
- Updates to labelling.
- Updates to design outputs.
- Change input review (as required).
- Change output review.



DESIGN CHANGE PROCESS

Standard Change Process



Two change reviews may be held as activities of the change action plan.

The change inputs and outputs reviews are conducted by a cross-functional team.

During change inputs review, reviewers confirm that the change plan identifies the impacted design inputs and outputs.

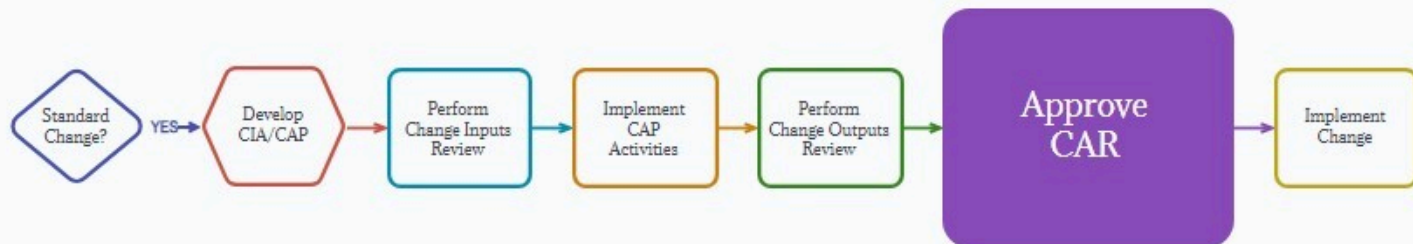
During the change outputs review, the reviewers confirm, based on objective evidence, that all activities are complete or that a method is in place to track any outstanding activities.

The Reviews are approved by executive management. A CIR is required when there are changes to the design inputs.



DESIGN CHANGE PROCESS

Standard Change Process



The final step is the approval of the CAR.

The CAR describes the results of the implementation activities described in the CAP. The CAR includes, amongst other things:

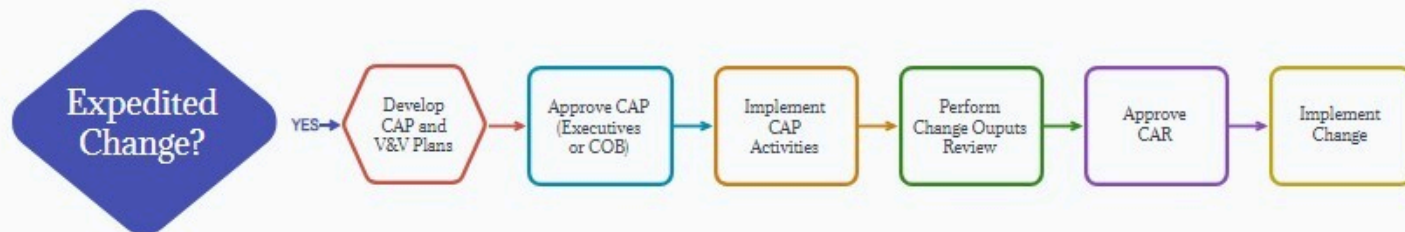
- Objective evidence that the actions identified in the plan have been completed,
- Rationales for any modifications from the change action plan,
- A description of how the change will be implemented into production, and
- Identification of any implementation regulatory / compliance requirements.

The CAR should also state if subsequent revisions will be necessary to document additional activities to support the phased implementation of the change outlined in the CAP.



DESIGN CHANGE PROCESS

Expedited Change Process



Expedited changes are assessed and managed following ADC's Expedited Change Process.

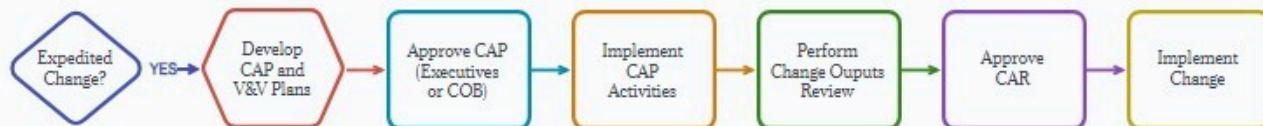
These design changes are intended to be implemented quickly with executive (or designee) design review and the option for offline approvals.

Expedited changes may include changes that are intended to reduce medical device safety risk and urgent changes that are not intended to reduce medical device safety risk (examples might include product outages, immediate customer impacts, or significant business risk).



DESIGN CHANGE PROCESS

Expedited Change Process



The goal of the Expedited Change Process is to expedite implementation and approval in order to get a fix into the field in as short a timeframe as possible, while still remaining compliant.

It is important to note that expedited design changes are compliant because there is a process in place to identify, document, verify or validate, review, and approve the change before it is implemented in the product.



DESIGN CHANGE PROCESS

Expedited Change Process



The Expedited Change Process is similar to the Standard Change Process but with two key differences.

First, approval of the CAP may be made by executive management (or their delegates) instead of by the full Change Oversight Board (COB).



DESIGN CHANGE PROCESS

Expedited Change Process

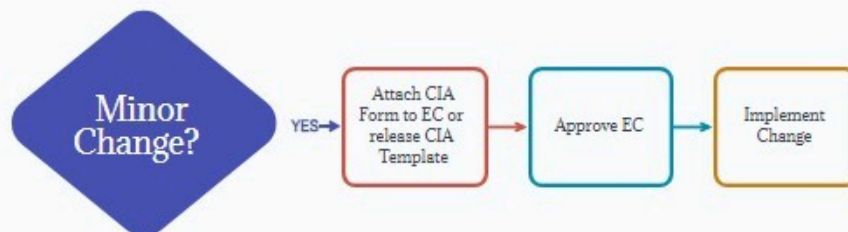


Second, a change may be implemented prior to updating all impacted design control deliverables, as long as the impacted items in the change impact assessment are identified in the CAP and the required updates to the design control deliverables are outlined in the CAP.



DESIGN CHANGE PROCESS

Minor Change Process



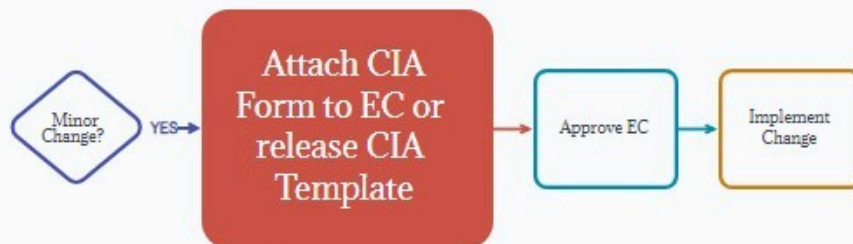
Changes that impact on-market products, but do not require design Verification or Validation are assessed and managed following ADC's Minor Change Process.

The Minor Change Process is a truncated version of the Standard Process.



DESIGN CHANGE PROCESS

Minor Change Process



A Change Impact Assessment (CIA) form is used (in place of a CAP) to record the proposed change, its impacts, and the activities required to manage its implementation.

The details of how to append or link the CIA are documented in 7.3W06. The Change Initiator is responsible for following the procedure (and understanding the differences between the CIA form and template).



DESIGN CHANGE PROCESS

Minor Change Process

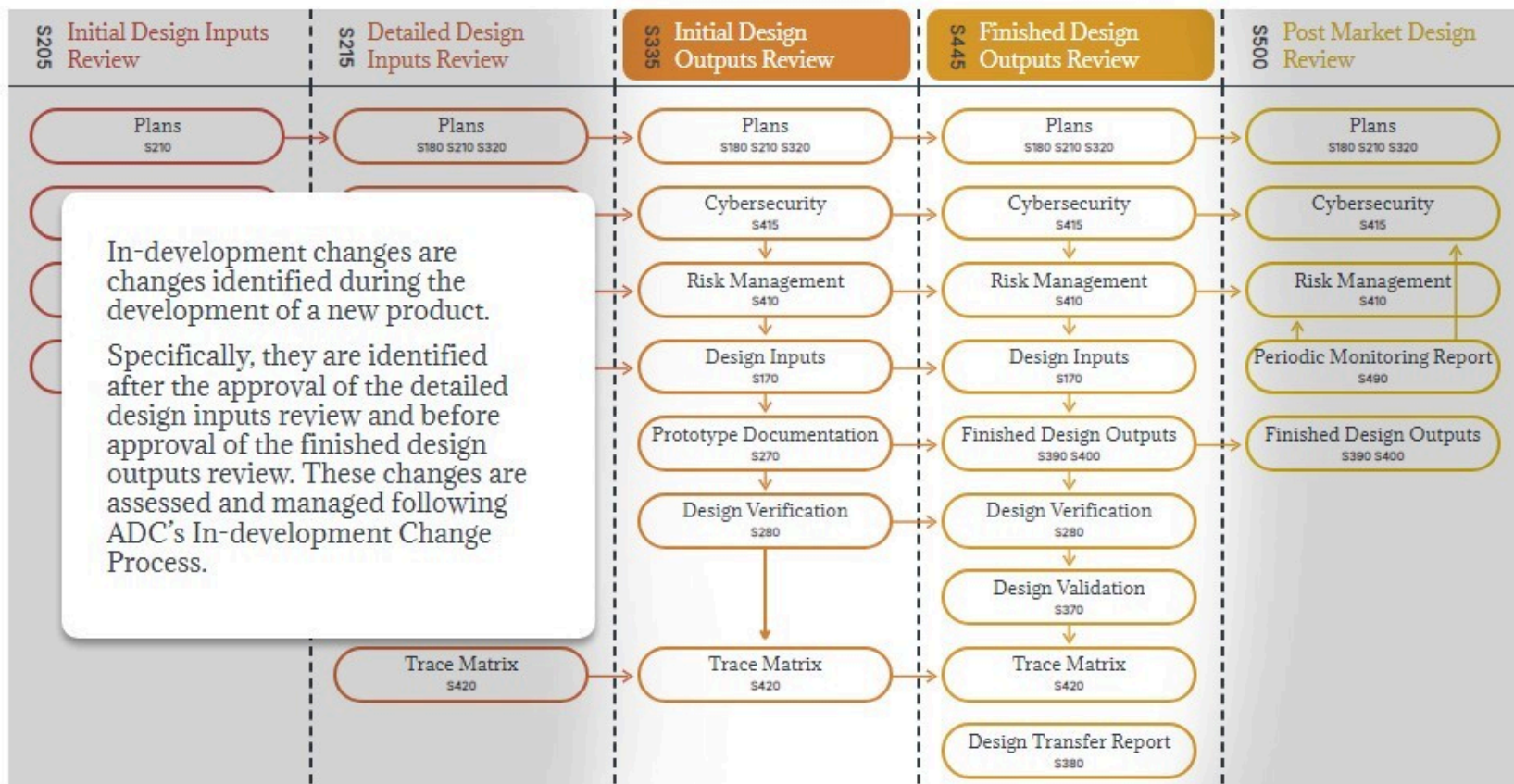


Once the CIA is approved, the change may be implemented.



DESIGN CHANGE PROCESS

In-Development Change Process



In-Development Change Process



The In-development Change Process is unique in that it is managed internally by the development team.

The development team identifies the change, assesses its impact on the design control elements, and documents the activities that are required to manage the change.



In-Development Change Process



These change actions are captured in a Change Request, which is then appended to the Design and Development (D&D) Plan. See details of documenting in development design changes in 7.3Wo6.

The use of a Change Request allows for the recording of the change impact assessment and required actions without requiring a revision to the D&D plan. The D&D plan is updated when the actions are completed.



DESIGN CHANGE PROCESS

Exempt Changes



Some specific types of changes that may impact the device master record or manufacturing process are exempt from the Design Change Control Procedure.

See the 7.3W06 for a list of exempt changes. The Change Team may also propose changes for exemption – the Change Initiator is responsible for requesting the exemption through appropriate justification.



Implementation Activities



Finally, before implementing any change to an on-market product, you must ensure that all documentation relating to the change has been approved.

The Change Initiator is responsible for confirming that the CIA /CAR (and, as required, other authorizations) have been approved, and that implementation activities may begin.

Implementation activities vary and may or may not be gated by the approval of the CIA / CAR.

Implementation activities which do not impact a DMR item may be completed at any time during execution of the design change; these activities may occur before approval of the CIA / CAR.

Implementation activities which do impact a DMR item may not occur before the CIA or CAR is approved.



DESIGN CHANGE PROCESS

Playing Your Part



As we have seen in the short course, ADC's Design Change Control Processes help us to identify change impacts and ensure that we have a plan in place to manage these impacts.

As an ADC employee, your role is to understand and follow the processes outlined in this training. If you have any questions or concerns about design change controls or about a specific design control process, speak to your manager or check out the resources available via the Resources icon in the course menu bar.



Where to Get Help



MANAGER OR SUPERVISOR

If you have questions or concerns about an activity or interaction, the best place to start is with your manager or supervisor.

Course Resources



TRANSCRIPT

Click [here](#) for a full transcript of the course

As an ADC employee, your role is to understand and follow the processes outlined in this training. If you have any questions or concerns about design change controls or about a specific design control process, speak to your manager or check out the resources available via the Resources icon in the course menu bar.

