



# Al Mustaqbal University

## College of Medicine



## Computer Science

### Lecture 7

## Machine Learning in Medical Devices

Presented By

Dr. Ahmed Hasan Al-Janabi

[Ahmed.janabi@uomus.edu.iq](mailto:Ahmed.janabi@uomus.edu.iq)

And

Dr Mohammed Fadhil

[mohammed.fadhil1@uomus.edu.iq](mailto:mohammed.fadhil1@uomus.edu.iq)

# Machine Learning in Medical Devices

- Agenda
  - Machine Learning
    - What is it?
    - Why is this special?
    - The FDA's treatment
  - Use case: Medical devices
    - How to make use of AI or ML in a medical device
  - Medical Device Safety Considerations
  - Development lifecycle with Machine Learning
  - Safeguards for Medical Devices with Machine Learning

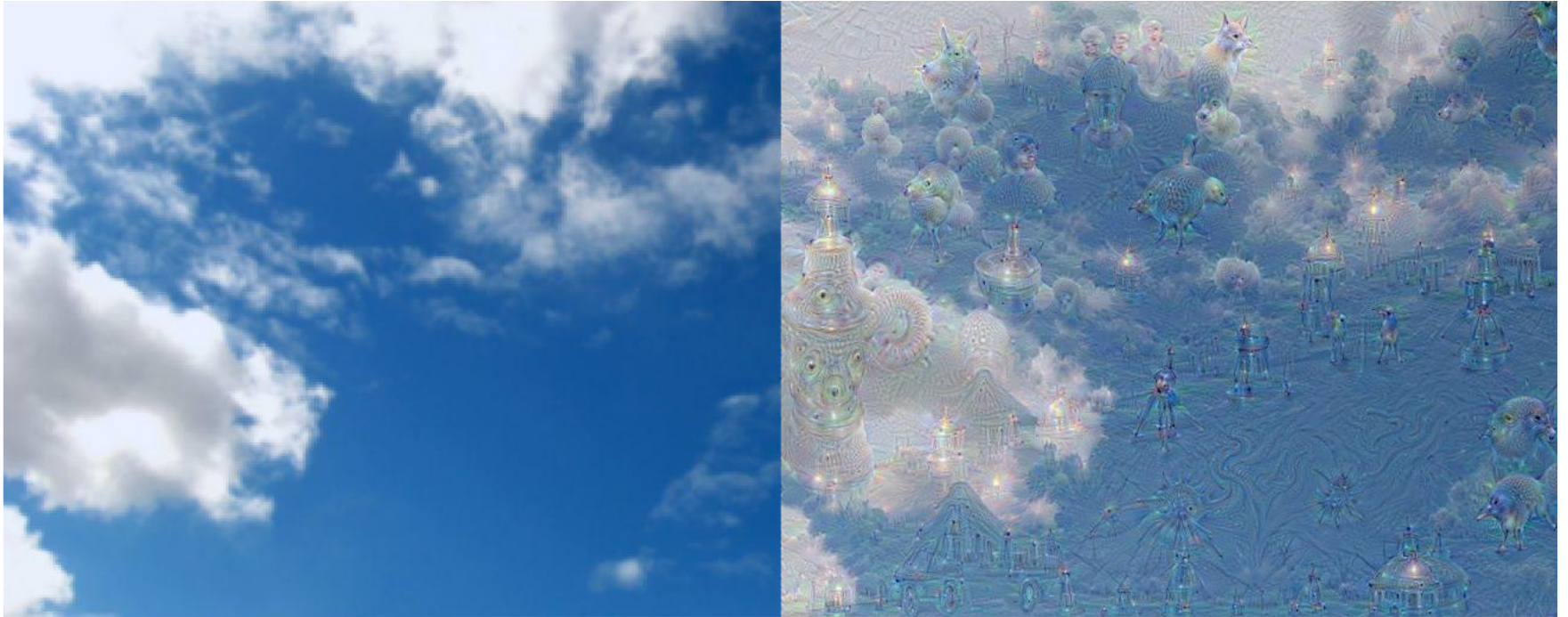
# Google's DeepDream

What does a network trained to see dogs see in an image without dogs?

Initially it was invented to help scientists and engineers to see what a deep neural network is seeing when it is looking in a given image.



# Inceptionism

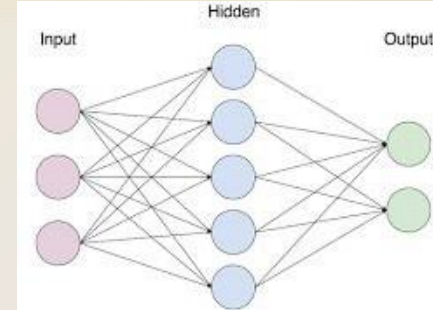
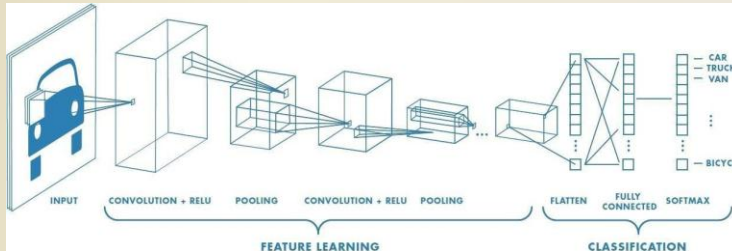
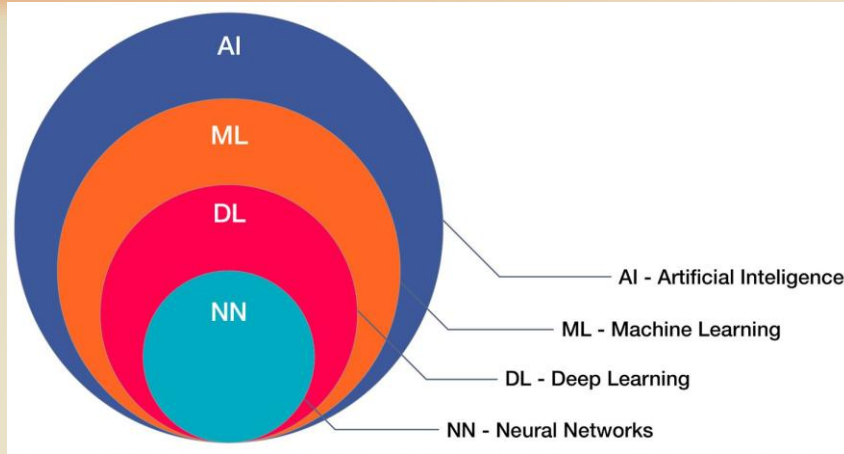




# What is AI/ML?

Without  
using explicit  
instructions

Relying on  
patterns and  
inference  
instead



Food and Drug Administration (FDA) defines ML as  
“...techniques used to design and train software algorithms to *learn from and act on data...*”  
“...when intended to *treat, diagnose, cure, mitigate, or prevent disease* or other conditions, are medical devices...”<sup>1</sup>

# Why ML is different.

# What's hard?

Different from conventional algorithms

**Wikipedia**

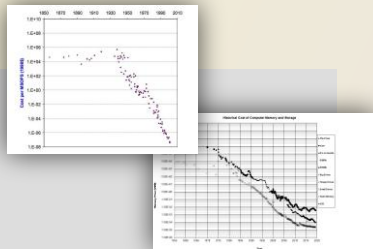
*“without using explicit instructions, relying on patterns and inference instead.”*

Why ML now?

**Compute power**  
Since 1984,

**Processor power**  
Up ~1,000,000X

**Data storage**  
Up ~5,000,000X



ML applications

**Recognition, categorization but not procedural**

Not ...

- word processors
- email clients
- multimedia players
- video games

Challenges

**Apocryphal, tanks or clouds?**

**Verification, local minima**

**Overtraining (remembering the answers)**

**Prove “Ground truth” (vs. gold standard)**

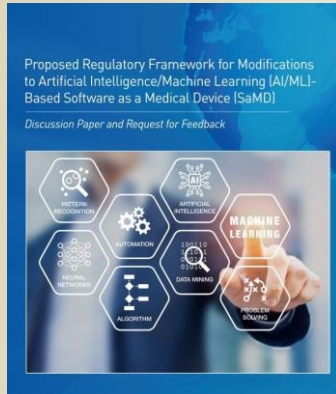
# The Problem

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ML products with algorithms that continually adapt  
based on new data require a new  
pre-market submission (510K).

# New from the FDA

FDA proposes regulatory framework for modifications to an AI/ML



<https://www.fda.gov/media/122535/download>



# FDA's Proposed Framework

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## Summary,

FDA allows **trusted manufacturers** to make **pre-approved changes** if they follow a **predetermined change control plan**

# FDA's Proposed Framework

<b>SaMD</b>	Software as a Medical Device	(phone, laptop, tablet)
<b>SPS</b>	SaMD Pre-Specifications	(this is what's going to change)
<b>ACP</b>	Algorithmic Change Protocol	(how the change is controlled)
<b>TPLC</b>	Total Product Life Cycle	(an ML lifecycle that includes data)

# FDA's Proposed Framework

## Summary,

FDA allows **trusted manufacturers** to make  
**pre-approved changes** if they follow a  
**predetermined change control plan**  
or,  
FDA allows changes to an ML-enabled **SaMD** with an **SPS** using **ACP** in a **TPLC**.

The diagram consists of blue horizontal brackets and brown curved lines. The first bracket is above 'pre-approved changes'. The second bracket is above 'predetermined change control plan'. A brown line starts from the first bracket, goes down, then right, then down again to connect to 'SaMD'. Another brown line starts from the first bracket, goes down, then right, then down again to connect to 'SPS'. A third brown line starts from the second bracket, goes down, then right, then down again to connect to 'ACP'. A fourth brown line starts from the second bracket, goes down, then right, then down again to connect to 'TPLC'.

# SaMD

## Software as a Medical Device

- Software that runs on a **generic computing platform** (computer, mobile phone, tablet computer)
- "**Software** intended to be used for one or more **medical** purposes that perform these purposes without being part of a hardware **medical device**."(IMDRF)
- No specially made hardware, doesn't control hardware motors, sensors, switches

SaMD Examples: Viewer for MRI images, ECG app, radiological image analysis (Computer Aided Detection)

# SPS & ACP

## SPS – SaMD Pre-Specification

- Anticipated modifications to performance or inputs or **intended use**
- A **region of potential changes**, around specifications and labeling

## ACP – Algorithm Change Protocol

- Plan to control risks while making changes
- Step-by-step process
  - Data management
  - Re-training
  - Performance evaluation
  - Update procedures

# TPLC – Total Product Life Cycle

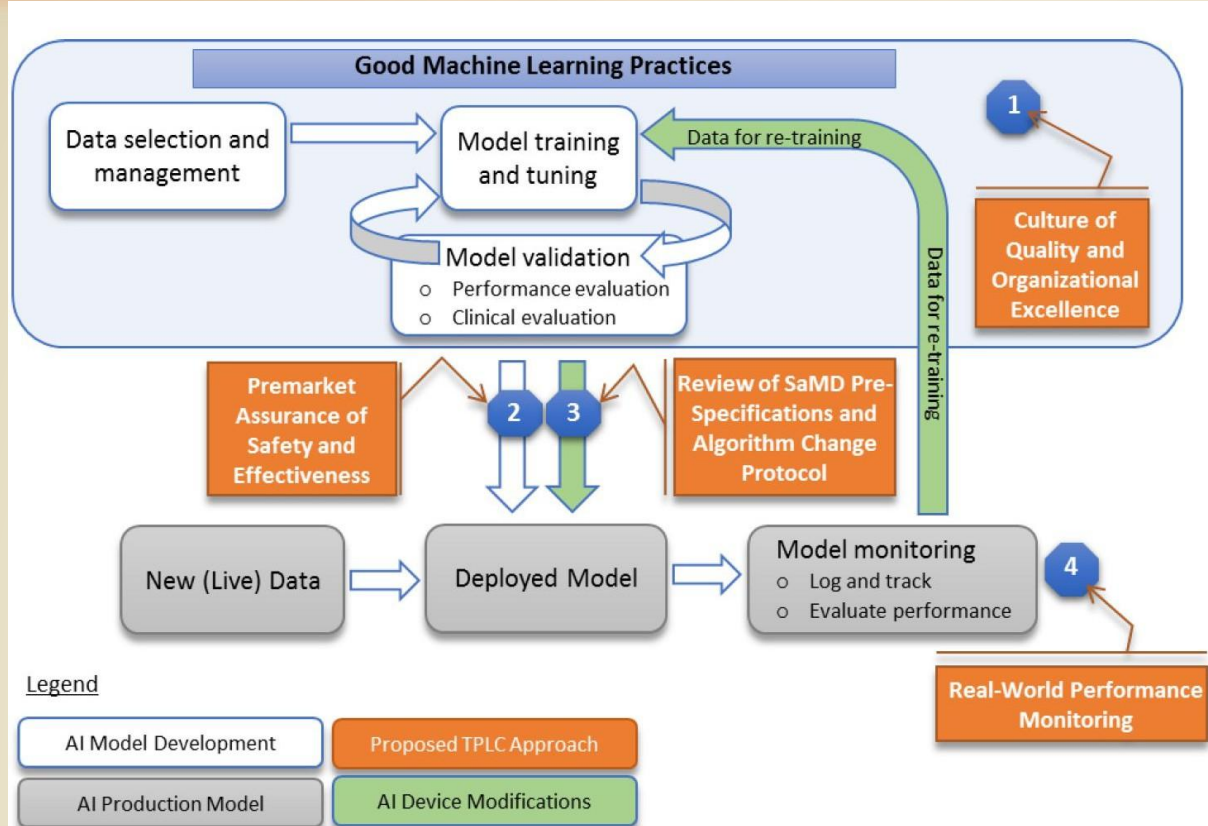
A regulatory framework

4 principles:

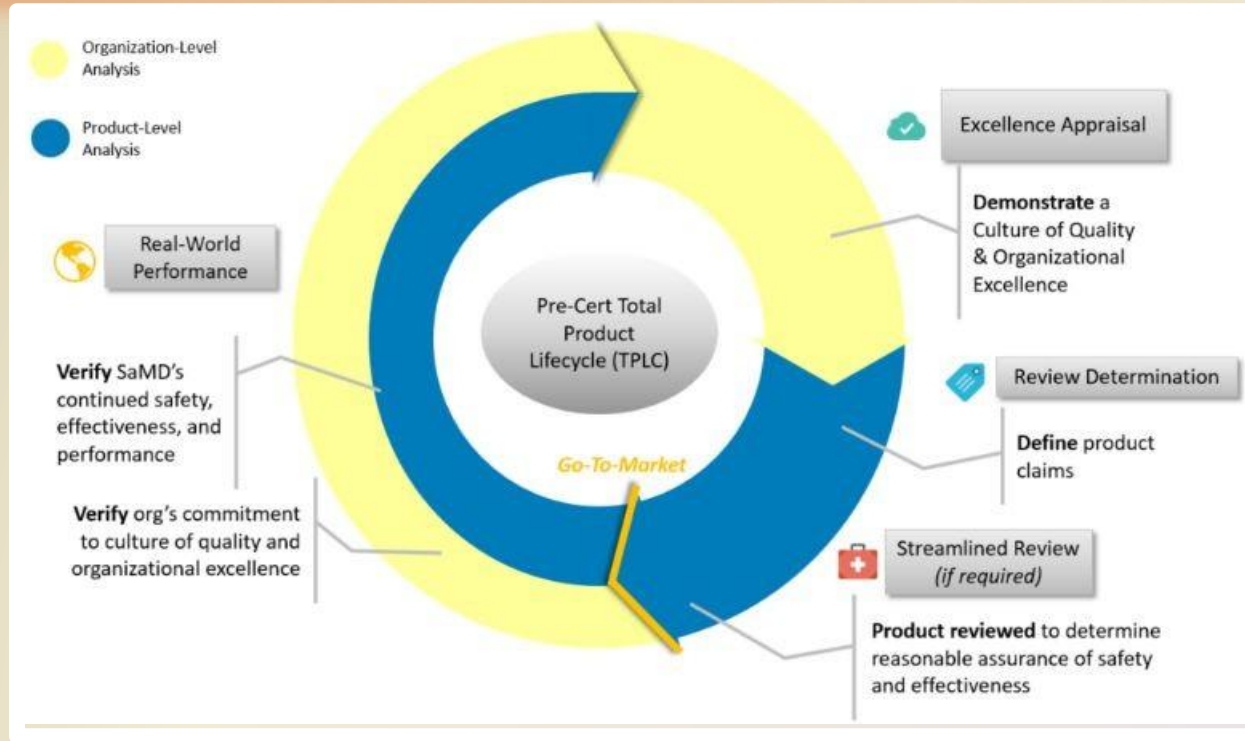
1. Quality systems and good machine learning practice (corporate reputation)
2. Initial premarket assurance of safety and effectiveness (premarket review)
3. Approach for modifications after initial review with an established SPS and ACP (change plan)
4. Transparency and real-time monitoring of AI/ML-based SaMD (PAY ATTENTION)



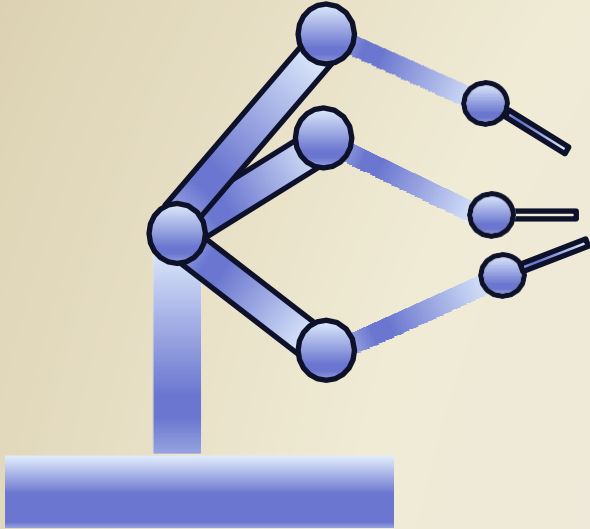
# TPLC on an AI workflow



# FDA's Software Precertification (Pre-Cert) Program



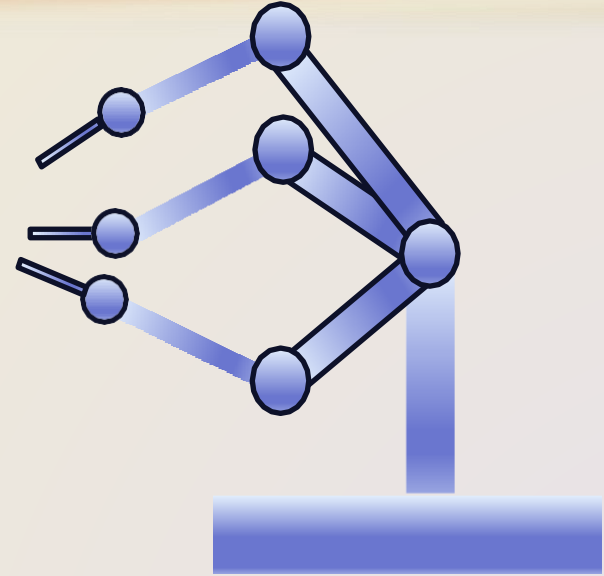
# Software Foundation — Safe



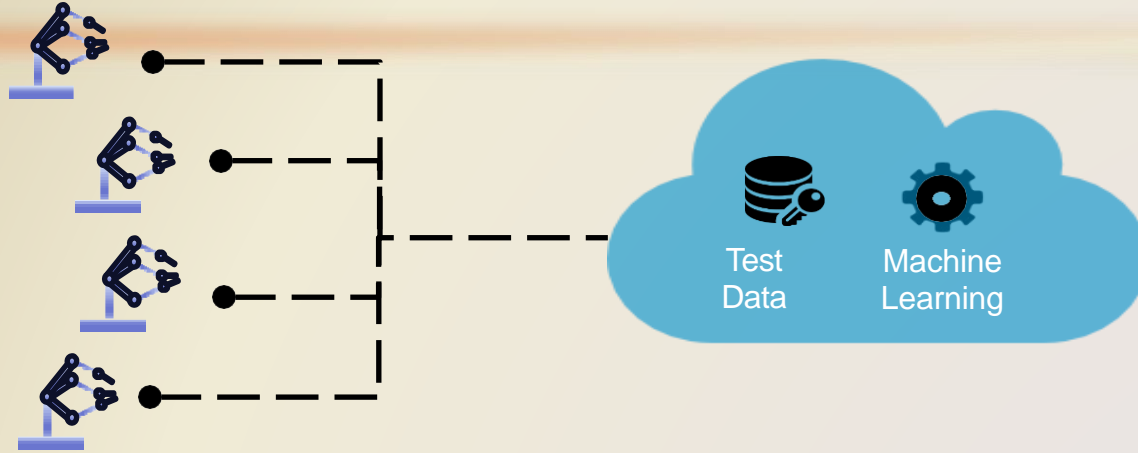
- Safe Real Time OS (QNX)
  - Certificate IEC 62304/61508
  - Safety Manual
  - Fault Tolerant
  - APIs (POSIX)
  - Networking
  - Well Tested/Deployed

# Software Foundation — Security

- Security Features
  - User permissions
  - Application permissions
  - FIPS 140-2
  - OpenSSL
  - Secure File System
  - Lifecycle Management
  - Virus Detection/Eradication



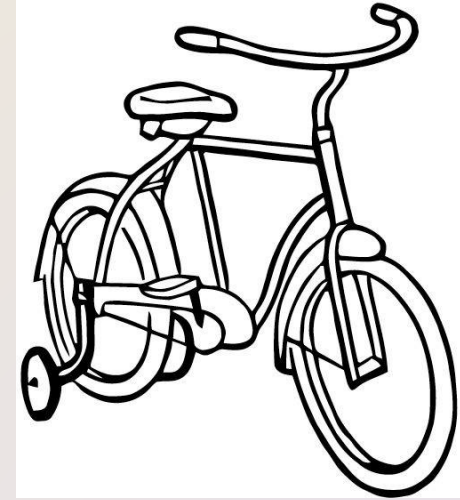
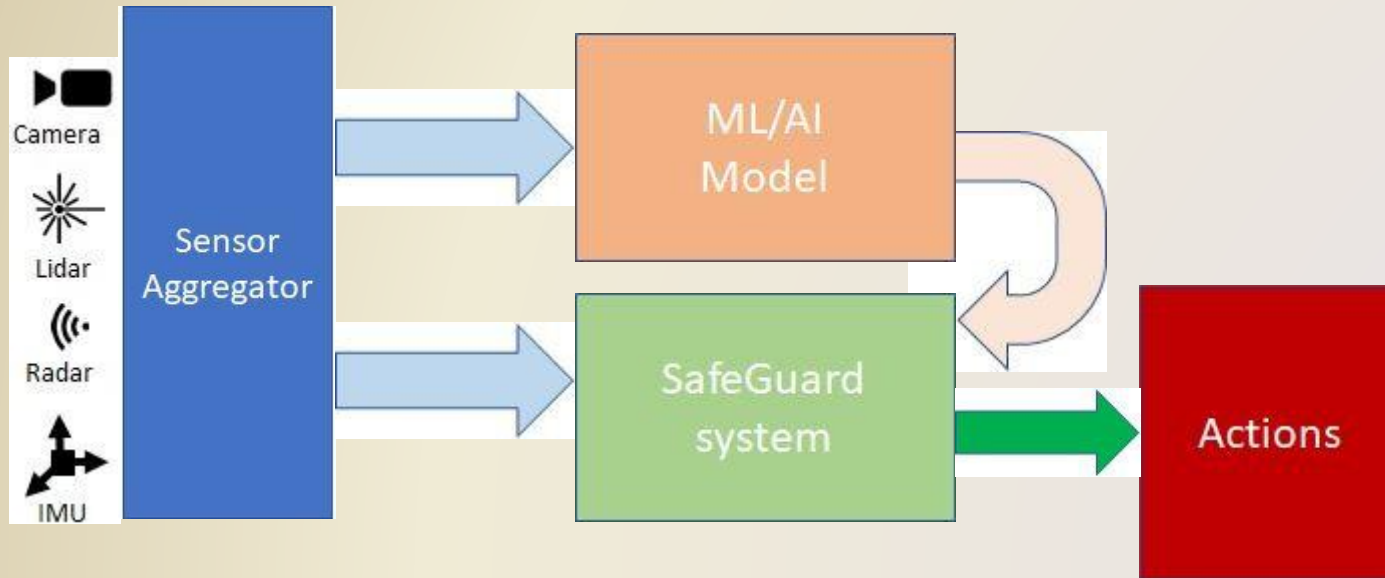
# Machine Learning in Cloud



- Collect test set data on Edge
- Propagate data securely to cloud (On/Off Premises)
- Train the model
- Distribute model securely to Edge devices

# SafeGuards

- Training wheels so you cannot fall.
- Validating the output of the model. Ensuring that it does not break major rules.





# Summary

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