



Marc Miller
Crimson
Life Sciences

FEATURE

GHTF Guidance Ignites Labeling Concerns for Orthopedic Manufacturers

Translation of labeling is now under more intense scrutiny.

The Global Harmonization Task Force (GHTF) was founded in 1992 in response to the growing need for international harmonization in the regulation of orthopedic and other medical devices. Chairmanship of the GHTF is rotated among the five Founding Members: the European Union, the United States, Canada, Australia and Japan.

The purpose of the GHTF is to encourage convergence in regulatory practices related to safety, effectiveness, performance and quality—promoting technological innovation and facilitating international trade. The primary means by which these goals are accomplished is via the development and publication of harmonized guidance documents on basic regulatory practices. Recently, the GHTF issued an important guidance (SG3/N15R8), based on ISO 13485:2003 and ISO 14971:2000, that has crucial implications for translation vendors serving orthopedic and other medical device manufacturers.

Risk Management: A Regulatory Time Bomb?

Orthopedic manufacturers are most familiar with risk management as it

relates to design and development. However, the GHTF guidance confirms a growing awareness that risk management is a requirement for all areas that affect a company's quality management system. This requirement was first introduced in the device-specific quality standard, ISO 13485:2003. In it, risk management and the current risk management standard (ISO 14971:2000) are directly referenced.

According to industry veteran and consultant Ed Kimmelman (a principal author of ISO 13485), many companies are struggling with effective implementation of this risk management requirement within their quality systems. In fact, industry anxiety was evident at a recent RAPS annual conference. One participant at a session, titled *Importance and Impact of ISO 13485:2003*, went so far as to term the new risk management requirement "a ticking time bomb hidden in ISO 13485."

The industry's nervousness stems largely from an expanded, company-wide requirement for risk management compliance. Kimmelman noted these areas where risk management is indicated:

- Competency of personnel
- Nature and depth of acceptance activities
- Handling of non-conformances
- Complaints and CAPA

Are all outside of product realization—the traditional risk management boundary for orthopedic companies.

MPO Summit

Similarly, product labeling (including IFUs, manuals and other instructional material) is directly affected by risk management. Translation of product labeling is yet one more piece of a complex risk management puzzle.

The Importance of Labeling for Risk Management

If you doubt the importance of labeling as a risk management tool, consider the recent multi-million dollar Vioxx debacle. Prior to Merck's voluntary recall, a simple label change kept the popular painkiller on the market.

According to GHTF guidance, effective labeling is the minimum that must be done within "a fixed hierarchy of risk control measures" to help mitigate product risk. Specifically, the guidance states: "*External communications methods such as warning labels, user manuals, advisory notices, etc. should also be utilized to communicate necessary risk information.*"

According to this (and other) published regulatory definition, product labeling is a vital risk management tool. Therefore, the accuracy of labeling information—in both its source and translated versions—is essential.

Labeling Translation and Responsibility

Most orthopedic manufacturers produce their own English-language labeling and documentation. Here, risk management is implicit because the company that developed the device is the clear choice to author the labeling. Still, product labeling receives close scrutiny from regulators and auditors, even after thorough vetting within the company.

When producing translated docu-

mentation, companies face a new risk: how to ensure that their translated labeling is accurate and fulfills the same risk management function as

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the original. Panelists at the 2004 RAPS annual conference highlighted this risk when they noted that inaccurate translation might jeopardize conformance to ISO 14971:2000 in overseas markets.

Since most manufacturers employ a vendor for translation services, insight into the vendor's risk management processes is essential to ensure that the manufacturer is meeting risk management responsibilities under ISO 13485, ISO 14971 and GHTF. According to the GHTF guidance: "*Processes required by the quality management system [eg, labeling] and performed by suppliers to the manufacturer are the responsibility of the manufacturer. Risk management activities [eg, translation of product labeling] relating to any process within the quality management system are ultimately the responsibility of the manufacturer.*"

In other words, labeling is a key risk management tool and you are responsible for ensuring that it is accurate.

Labeling Translation Risk Defined

With responsibility assigned to the manufacturer, the importance of due diligence in the vendor selection process is clear. According to the GHTF guidance: "*Established criteria for selection, evaluation and re-evaluation of suppliers of purchased products and services should also be based upon the risk associated with identified hazards related to the purchased products and services determined during the risk management process.*"

Since translated labeling is both a potential hazard and a specified risk management tool, evaluation criteria are clearly required for vendors. In fact, published guidance from KEMA Notified Body specifies risk management for translation vendor selection: "*Due to compliance implications for the essential requirements of the MDD and IVDD, Notified Bodies consider translation to be an 'important outsourced service'—and translation suppliers to be 'approved vendors.' This makes translation providers subject to the outsourced vendor risk management considerations of ISO 13485:2003 and ISO 14971.*"

The first step in defining appropriate criteria for translation vendors is to understand the risks associated with the activity. Published guidance from KEMA Notified Body clearly states that preventing serious errors (that may result in patient harm) is the ultimate goal of effective translation risk management.

Translation Risk: Sources and Mitigations

Notified Body guidance also indicates that Resources and Processes are the primary source of translation risk. In

fact, the only published patent that deals with translation risk management specifically defines two basic risk types: Resource Risk and Process Risk. These risks may be mitigated through a systematic quality approach, such as is embodied in quality systems standards such as ISO 13485:2003 or ISO 9001:2000. In such a system, translation resource risk is mitigated through screening, testing and audit.

Screening involves predetermined criteria, such as an advanced degree in the subject area or minimum years of professional experience in the subject area. Similar to orthopedic device manufacturing translation testing and audit are best carried out using controlled materials and with the help of an objective standard such as the SAE J2450 translation quality metric. An adaptation of this standard has received Notified Body endorsement for use in resource testing and in-process QA.

Process risk is managed using classic risk management techniques, such as redundancy and diversity. For instance, traditional translation risk management relies on a single redundant review—translation and edit. However, this basic process is inadequate for the demanding requirements of medical translation. For instance, complex multilingual formatting is often required for printed materials. Quality control in this area requires several redundant reviews of format proofreading according to a documented procedure.

Along with redundant review, risk management can be improved through process diversity. By aiming for a similar result, different processes can effectively complement one another. For example, much of the language in

an orthopedic device IFU is physically descriptive, usually involving a large number of prepositional phrases. These are an especially error-prone component of translation. A “diverse” process might include a structured linguistic “pre-flight” step by a qualified resource. If this step produces linguistic instructions that help to guide the translation—and therefore avoid potential errors—it is good translation risk management.

Criteria for Choosing Your Labeling Translation Vendor

Given the importance of labeling as a risk management tool and the responsibility of the manufacturer to control the outsourced translation activity, established vendor selection criteria (based on Resource and Process risks) are essential. Based on regulatory requirements, your criteria should include:

•**Registered Quality System**—Third-party certification helps to ensure compliance with generic (ISO 9001:2000) or orthopedic device-specific quality system requirements (ISO 13485:2003).

•**Resource Screening, Testing, Audit**—What is the vendor’s process for ensuring that resources are qualified? Can the vendor provide evidence of testing and qualification? Monitoring and (when appropriate) dismissal? Does the company use an objective standard, such as SAE J2450?

•**Control of Process Risk**—Does the vendor employ process redundancy and diversity? Does the vendor have a specific process step to manage the risk of prepositional phrases common in orthopedic IFUs? How does the vendor address the “native speaker dilemma” (ie, verify semantic accuracy)?

•**Process Documentation**—Can the vendor provide in-process documentation as evidence that all specified steps were carried out as required?

•**Client/Feedback/References/Endorsements**—Can the vendor provide references from medical clients, Notified Bodies or other regulators to demonstrate the effectiveness of the company’s process? What is its process for gathering client feedback? Results?

Just-published GHTF guidance directs orthopedic and other device companies to exercise risk management in their important outsourced processes. One of the most commonly outsourced activities, translation, has critical implications for your risk management strategy (through labeling) in overseas markets. Based on this, Notified Body guidance specifies appropriate risk management when selecting a translation vendor.

According to the GHTF guidance, established criteria are required for selection, evaluation, and re-evaluation of labeling translation suppliers. These criteria should take into account the known risks associated with the translation activity, such as resource and process risks. ♦

Marc Miller is president of the Crimson Life Sciences division of New York-based TransPerfect Translations (TPT). A Harvard graduate, Miller holds an MBA and served a two-year stint as a senior research associate with a strategy consulting firm, prior to entering the translation industry. He can be reached at (415) 563-8663 or mmiller@crimsonlanguage.com.