# Putting it in Writing: Purpose and Best Practices of Letter-to-File for Medical Devices

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**Abstract**

In the medical device industry, the practice of creating a "Letter to File," "Note to File," or "Memo to File" is employed to document modifications to a device in the USA for regulatory and compliance purposes. Although the U.S. Food and Drug Administration (FDA) have provided guidance on this topic over the years, there has not been a thorough exploration of this concept. Medical device manufacturers frequently make changes to their FDA-cleared products, but determining whether to handle the change internally using a Letter to File or notify the FDA can be unclear. This article provides a comprehensive overview of what a Letter to File is, the purpose of writing one, and the appropriate situations in which a company might use it. Additionally, it also discusses the contents of a typical Letter to File, including the necessary elements and the best practices for writing it effectively and consequences of making the wrong decision. By providing guidance on the Letter to File process, this article aims to assist professionals in the medical device industry in maintaining precise records that can support their organizations in any regulatory situation.

Keywords: Medical Devices

## 1. Introduction

A "Letter to File (LTF)" is a regulatory concept in the United States that refers to a written document that is meant to be added to a company's regulatory file for a specific product, but not necessarily submitted to the FDA for review and approval. This pathway can be used to document when the company is planning a change or modification to previously cleared 510(k) devices.

Introducing modifications to an existing device can invite regulatory challenges for manufacturers. However, the answer to all such questions is that – 'it depends on various factors,' with the type of modification being implemented as the primary consideration. There are two possible routes one can pursue - LTF and Special 510(k) or PMA Supplement.

While both Special 510(k)s and LTFs are regulatory pathways used in medical device sustenance, they serve different purposes. Special 510(k) Program is intended to facilitate the submission, review, and clearance of a change to a manufacturer's own legally marketed predicate device ("existing device") that is already authorized for commercial distribution through 510(k) clearance. In contrast, a LTF is a documentation tool used to capture and

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maintain information related to a change. It is not a submission to the FDA. Instead, they are meant to be kept in the company's regulatory file and made available to the FDA upon request.

Letter to File can be used for various purposes, including labeling, technology, engineering, performance, and material changes to a product. It's crucial to understand that while submitting a letter to file to the FDA is not mandatory, it only applies to changes that don't require a new regulatory submission. The FDA Guidance "Deciding When to Submit" a 510(k) for a Change to an Existing Device" determines the need for a new 510(k) submission or documentation. Careful consideration must be given to this decision as incorrect choices can lead to significant fines, product recalls, and the dreaded Form 483 citation from the FDA. It is essential to grasp the FDA's criteria for identifying changes in medical devices that necessitate a new 510(k) submission.

The testing, analysis or validation reports that a manufacturer puts together to support a modification, whether for a Special 510(k)s and LTFs, are the same. The only thing it depends on is what you do with it. Manufacturers can either file and store it in a cabinet, without any further action, or send it to the FDA.

Table 1: Template to be used for Detailed Representation of Device Information

| Category | Device Information |
|---|---|
| 1. Device Trade Name | XYZ |
| 2. Device Common Name | ZYX |
| 3. Device Classification | Class II |
| 4. FDA Review Panel | General and Plastic Surgery |
| 5. FDA Product Code (Classification subsequent) | LMF |
| 6. 510(k) number of file being modified | K22517X |
| 7. Indications for Use/Intended Use | As per your FDA submission |
| 8. Current Market Status | Available for distribution |
| 9. Change Type (CheckAppropriate Box) | ☒Labeling Change<br>☐Technology, Engineering and Performance Changes<br>☐Material Change |

## 2. Methodology

When preparing a letter to file, companies should follow the FDA's guidelines (Deciding When to Submit a 510(k) for a Change to an Existing Device) for the format of LTF. This includes using clear and concise language, appropriate headings and subheadings, and ensuring that the letter is well organized, easy to read and comprehend. One can use the following structure to draft a letter to file.

1. **Purpose:** Clearly state the proposed changes, type of changes as per the guidance and the 510(k) number of the device to which the change is proposed in the section.

   Refer to example below:

   *"The purpose of this Letter to File is to document the assessment of proposed changes to*

   *<insert the name of the device> <state the type of change>, resulting in the <state the change in documentation, if any>, with respect to <insert 510(k) number of the proposed changes device>, and per existing applicable US FDA regulations and guidance (ref: Deciding When to Submit a 510(k) for a Change to an Existing Device)."*

   You can use the format shown in Table 1 for a detailed representation of the device information.

2. **Device Description:** Ideally, according to your 510(k) summary, specify the description of the device undergoing the proposed changes. Extract the detailed drawings, including dimensions and tolerances for every device, accessory, and component from the design outputs. Specify the material of the components that come into contact with the patient. Ensure that you include the device's indications for use statements.

3. **Description of Change(s):** Detail the proposed changes for the device thoroughly. It could be as simple as updating contact information such as name, company logo, etc. in the labeling. Utilize images if necessary to enhance clarity between existing and proposed changes.

4. **Reason for Change:** Explicitly state the rationale for the proposed changes and the factors that triggered them. The change may have been instigated either for business purposes or to enhance aesthetics or any other reasons as applicable.

5. **Applicable Regulatory History**: That could include 510(k) number and comparison of modified devices to the most recently cleared version.

6. **Change Assessment**: This should present the regulatory evaluation based on the decision-making flowchart outlined in the guidance. It is advisable to present the flowchart in a question format and justify how it results in the decision to document. The recommended regulatory action (either submitting a 510(k) or a Letter to file) is determined based on the assessment. When it comes to making changes to a product do not rely on LTFs as the primary mechanism for making changes to a product's design or performance specifications. Instead, changes should be made through a formal Change Control process that includes a risk assessment and impact analysis, as well as appropriate verification and validation activities.

*Note: The method for handling Letter to File (LTF) documentation should be clearly defined in a company's Quality Management System (QMS). Ultimately, the decision to submit a new 510(k) or other regulatory submission should be based on a risk-based assessment that takes into account the nature and significance of the changes being made, as well as regulatory requirements and industry's best practices.*

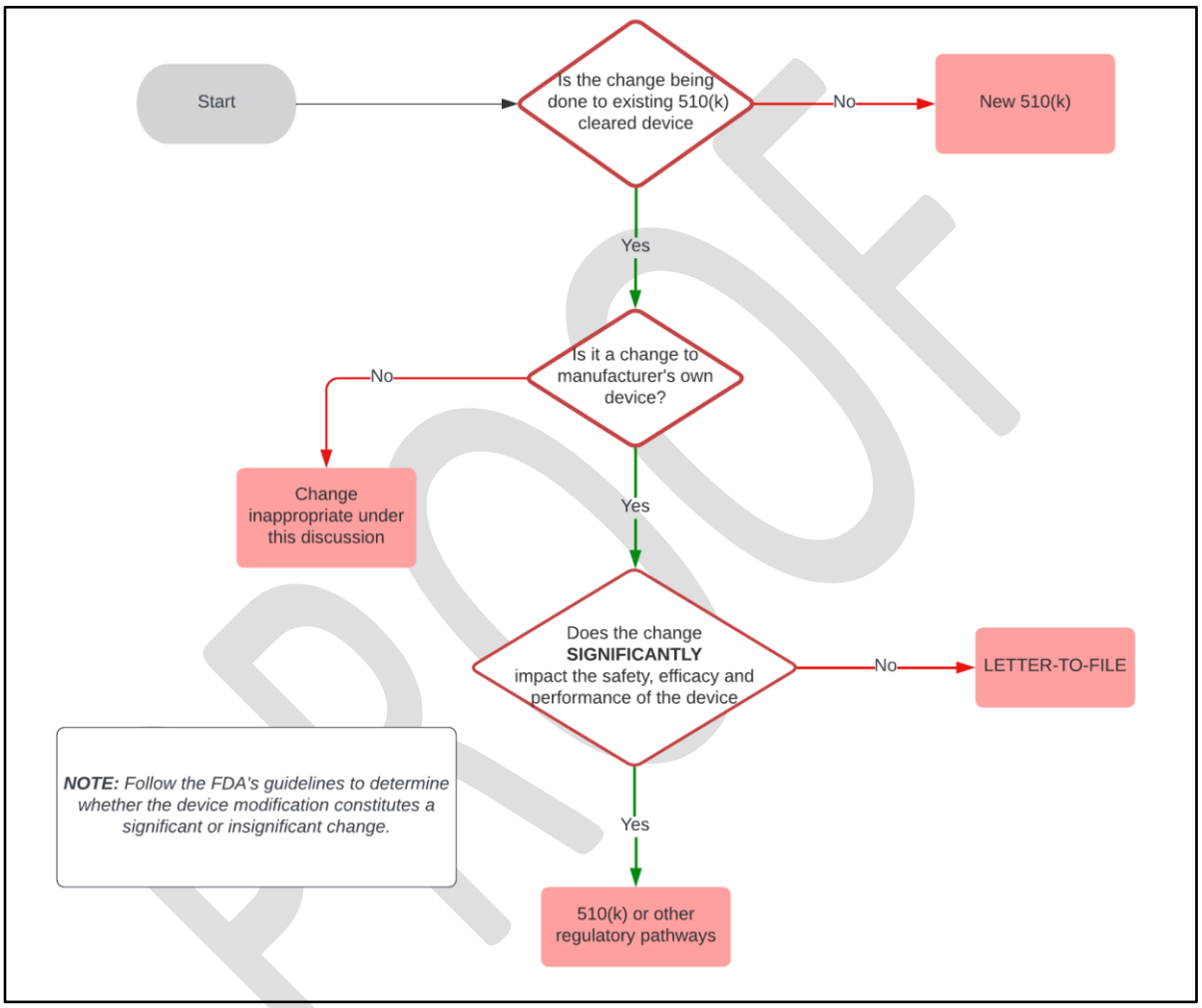


*Figure 1: Regulatory Logic Flowchart*

7. **Impact Assessment:** The impact of the changes to the existing device, documentation and systems should be adequately elaborated in this section. Include the document and revision number of the changing documentation as per your internal change management procedure.

8. **Risk-Based Assessment:** A thorough risk analysis needs to be conducted to identify hazards associated with the device, estimate and evaluate the risks associated with those hazards, control

those risks, and monitor the effectiveness of those controls. The risk-based assessment and the testing that was performed to support the change, identifies that there is no impact on the safety, efficacy and performance of the device. The change should be properly documented and could be justified by using validation reports, literature reviews, letters from subject matter experts or simply based on regulatory logic as explained in the flowchart (Fig.1).

9. **Conclusion:** The conclusion should summarize the purpose of the letter and reiterate the company's commitment to working with the FDA to ensure the safety and efficacy of the product.

10. **Review and Approval:** Ensure that the appropriate individuals within the company has reviewed and approved the letter.

11. **Documentation:** Keep a copy of the letter in the company's regulatory file and make it available to the FDA upon request.

## 3. Disadvantages

While Letter to File may be the fastest option to implement the changes, it can also have significant drawbacks. Therefore, a thorough evaluation of the modification should be conducted before deciding on the appropriate path forward. One of the primary drawbacks of LTF pathways is that they are not reviewed or approved until the FDA contacts the manufacturer. This means that there is no external validation of the information contained in the document. While companies are responsible for ensuring that their LTFs are accurate and complete, errors or omissions may not be detected until a regulatory authority reviews the documentation during an inspection. This can result in regulatory delays, additional costs, and potential product recalls.

They have a further disadvantage. LTFs can demand significant time and resources for their creation and upkeep. Companies must carefully document their device development and testing activities in real-time, which can be challenging in a fast-paced development environment.

Finally, Letter to File are challenging to organize and manage, particularly for companies with a large portfolio of products. As the number of LTFs grows, it becomes challenging to keep track of which LTFs apply to which devices, and to ensure that all LTFs are up-to-date and complete.

## 4. Conclusion

The firm needs to give careful consideration to the decision about deciding whether to utilize a Letter to File (LTF) or submit a New 510(k) application to document the changes made to a device that has already received clearance. Ultimately, this decision ceases to be purely regulatory and becomes a business decision. Some companies may adopt a conservative approach and notify the FDA of any

changes, while others may take a more aggressive approach and choose not to notify the FDA but still be prepared to justify their decision if required in the future. There is no definitive right or wrong approach to this process.

To conclude, utilizing a Letter to File can be an effective means for medical device companies to demonstrate their commitment to regulatory compliance and document their efforts to address any modifications made after obtaining 510(k) clearance or commercializing a product.

## 5. Declaration of Conflict of Interest

The authors of this paper are employees of Axio Biosolutions Private Limited. No Axio products are promoted in this paper. Rather, the focus is on the Letter to File process in the United States. No other conflicts of interest exist for the authors of this paper.

## 6. Disclaimer

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## 7. References

[1] FDA (2017) Deciding When to Submit a 510(k) for a Change to an Existing Device Guidance for Industry and Food and Drug Administration Staff. https://www.fda.gov/media/99812/download (Last Accessed on April 10, 2023)

[2] FDA (2019) Contains Nonbinding Recommendations The Special 510(k) Program Guidance for Industry and Food and Drug Administration Staff. https://www.fda.gov/media/116418/download (Last Accessed on April 10, 2023)