



## **Preface**

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## Table of Contents

46		
47		
48	<b>I. INTRODUCTION.....</b>	<b>5</b>
49	<b>II. BACKGROUND .....</b>	<b>6</b>
50	<b>III. SCOPE .....</b>	<b>7</b>
51	<b>IV. RISKS TO HEALTH.....</b>	<b>7</b>
52	<b>V. DEVICE DESCRIPTION .....</b>	<b>8</b>
53	<b>VI. TEST METHODOLOGY .....</b>	<b>8</b>
54	<b>VII. ESTABLISHING PERFORMANCE CHARACTERISTICS.....</b>	<b>9</b>
55	<b>A. ANALYTICAL STUDIES .....</b>	<b>9</b>
56	<b>(1) Limit of Detection .....</b>	<b>9</b>
57	<b>(2) Precision .....</b>	<b>10</b>
58	<b>(3) Cross-Reactivity.....</b>	<b>13</b>
59	<b>(4) Interference .....</b>	<b>14</b>
60	<b>(5) Carry-Over and Cross-Contamination Studies (for devices with automated</b>	
61	<b>liquid handling systems).....</b>	<b>15</b>
62	<b>(6) Specimen Storage and Shipping Conditions .....</b>	<b>16</b>
63	<b>(7) Reagent Storage and Shipping Conditions.....</b>	<b>16</b>
64	<b>(8) Evaluation of HPV Detection in the Clinical Dataset.....</b>	<b>17</b>
65	<b>B. CLINICAL PERFORMANCE STUDIES.....</b>	<b>19</b>
66	<b>(1) Consideration of the Cervical Cancer Screening Guidelines .....</b>	<b>19</b>
67	<b>(2) Intended Use.....</b>	<b>19</b>
68	<b>(3) Study Design Considerations Common to ASC-US Triage, Adjunct and Primary</b>	
69	<b>Screening Intended Uses (and likely any other intended uses): .....</b>	<b>20</b>
70	<b>(4) ASC-US Triage Intended Use.....</b>	<b>24</b>
71	<b>(5) ASC-US Population - HPV Tests for Detection and Differentiation (HPV</b>	
72	<b>Genotyping Tests) .....</b>	<b>28</b>
73	<b>(6) Adjunct Intended Use.....</b>	<b>29</b>
74	<b>(7) Adjunct Intended Use – HPV Tests for Detection and Differentiation (HPV</b>	
75	<b>Genotyping Tests) .....</b>	<b>32</b>
76	<b>(8) Primary Screening Intended Use .....</b>	<b>32</b>
77	<b>(9) Study Design to Cover All Three HPV Testing Claims (ASC-US Triage, Adjunct</b>	
78	<b>and HPV Primary Screening).....</b>	<b>34</b>

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79 **C. CONTROLS** ..... 35

80     **(1) External Controls** ..... 35

81     **(2) Internal Control**..... 36

82 **VIII. REFERENCES**..... 36

83 **IX. APPENDIX – STATISTICAL ANALYSIS**..... 39

84

**DRAFT**

85 **Establishing the Performance**  
86 **Characteristics of In Vitro Diagnostic**  
87 **Devices for the Detection or Detection**  
88 **and Differentiation of Human**  
89 **Papillomaviruses**

90 **Draft Guidance for Industry and Food**  
91 **and Drug Administration Staff**

92  
93 *This draft guidance, when finalized, will represent the current thinking of the Food and Drug*  
94 *Administration (FDA or Agency) on this topic. It does not establish any rights for any person*  
95 *and is not binding on FDA or the public. You can use an alternative approach if it satisfies*  
96 *the requirements of the applicable statutes and regulations. To discuss an alternative*  
97 *approach, contact the FDA staff responsible for this guidance as listed on the title page.*

98  
99 **I. Introduction**

100  
101 FDA is issuing this draft guidance to facilitate study designs to establish the performance  
102 characteristics of in vitro diagnostic devices (IVDs) intended for the detection, or detection and  
103 differentiation, of human papillomaviruses (HPVs). These devices are used in conjunction with  
104 cervical cytology to aid in screening for cervical cancer or as first-line primary cervical cancer  
105 screening devices. These devices include those that detect a group of HPV genotypes,  
106 particularly high risk HPVs, as well as devices that detect more than one genotype of HPV and  
107 further differentiate among them to indicate which genotype of HPV is present. More than 100  
108 HPV genotypes have been identified, approximately 40 of which can infect the genital tract [Ref.  
109 1]. Infection with ‘high-risk’ types of HPV is considered a necessary cause of virtually all  
110 cervical cancer [Ref. 2]. Approximately fourteen HPV genotypes are considered carcinogenic or  
111 “high risk” [Ref. 3 & Ref. 20]. For the remainder of this document, “HPV” refers to a “high  
112 risk” HPV, except where otherwise noted. A “high risk HPV test” refers to an HPV IVD device  
113 that detects, but does not differentiate between different types of HPV; while a “HPV genotyping  
114 test” refers to an HPV IVD device that detects and further differentiates HPV types (some HPV  
115 tests provide individual HPV genotyping results in addition to the results of pooled probes).  
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117 This draft guidance, when finalized, provides detailed information on the types of studies the  
118 Food and Drug Administration (FDA) recommends to support a premarket application (PMA)  
119 for these devices. It is recommended that you contact FDA prior to beginning your studies to  
120 discuss specific study proposals and performance goals for your device.

121  
122 This draft guidance is limited to studies intended to establish the performance characteristics of  
123 in vitro diagnostic HPV devices that are used in conjunction with cervical cytology for cervical  
124 cancer screening or as first-line primary cervical cancer screening devices. This draft guidance  
125 specifically addresses devices that qualitatively detect HPV nucleic acid from cervical  
126 specimens, but many of the recommendations will also be applicable to devices that detect HPV  
127 proteins. See Section III “Scope” for more details on what is covered by this draft guidance  
128 document.

129  
130 FDA’s guidance documents, including this guidance, do not establish legally enforceable  
131 responsibilities. Instead, guidances describe the Agency’s current thinking on a topic and should  
132 be viewed only as recommendations, unless specific regulatory or statutory requirements are  
133 cited. The use of the word *should* in Agency guidances means that something is suggested or  
134 recommended, but not required.

135

## 136 **II. Background**

137 This document, when finalized, provides guidance for establishing the performance  
138 characteristics of in vitro diagnostic devices for the detection, or detection and differentiation, of  
139 human papillomaviruses in cervical specimens. These recommendations apply to PMAs for  
140 HPV IVDs.

141 A manufacturer who intends to market an IVD device for detection, or detection and  
142 differentiation, of human papillomaviruses must conform to the requirements of the Federal  
143 Food, Drug, and Cosmetic Act (the FD&C act) and obtain premarket approval prior to marketing  
144 the device (sections 513 and 515 of the FD&C Act; 21 U.S.C. 360c and 360e). Because HPV  
145 diagnostic devices are postamendment devices, they are automatically classified as class III  
146 under section 513(f)(1) of the FD&C act. Devices that have been classified by section 513(f)(1)  
147 into class III require premarket approval in accordance with section 515 of the FD&C act. See  
148 section 515(a)(2) of the FD&C act (requiring premarket approval for devices classified into class  
149 III by section 513(f)); see also section 513(a)(1)(C) of the FD&C act (defining a class III device  
150 as one that "is to be subject, in accordance with section 515, to premarket approval to provide  
151 reasonable assurance of its safety and effectiveness").

152

153 Further information on device testing can be found in FDA’s guidance entitled “In Vitro  
154 Diagnostic (IVD) Device Studies – Frequently Asked Questions” at  
155 ([http://www.fda.gov/downloads/MedicalDevices/DeviceRegulationandGuidance/GuidanceDocu  
156 ments/ucm071230.pdf](http://www.fda.gov/downloads/MedicalDevices/DeviceRegulationandGuidance/GuidanceDocuments/ucm071230.pdf)), and FDA’s guidance entitled “Guidance on Informed Consent for *In*  
157 *Vitro* Diagnostic Device Studies Using Leftover Human Specimens that are Not Individually  
158 Identifiable” at

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159 (<http://www.fda.gov/downloads/MedicalDevices/DeviceRegulationandGuidance/GuidanceDocuments/ucm071265.pdf>).  
160  
161

### 162 **III. Scope**

163  
164 This document recommends studies for establishing the performance characteristics of in vitro  
165 diagnostic devices for the qualitative detection, or detection and differentiation, of HPV. This  
166 guidance is limited to studies intended to establish the performance characteristics of in vitro  
167 diagnostic HPV devices that are used in conjunction with cervical cytology for cervical cancer  
168 screening, or as first-line primary cervical cancer screening devices. It does not address HPV  
169 testing from non-cervical specimens, such as pharyngeal, vaginal, penile or anal specimens, or  
170 testing for susceptibility to HPV infection. It does not address quantitative or semi-quantitative  
171 assays for HPV.  
172

173 As postamendment devices, HPV diagnostic devices are automatically classified as class III  
174 devices under section 513(f)(1) of the FD&C act. To date, two product codes have been  
175 established for HPV nucleic acid detection devices: MAQ (HPV DNA detection devices) and  
176 OYB (HPV RNA detection devices). Both of these product codes are class III. The  
177 recommendations in this guidance apply to HPV diagnostic devices that detect HPV nucleic acid  
178 (HPV DNA and RNA). Many of the recommendations will also apply to HPV detection devices  
179 that utilize targets other than HPV nucleic acid (such as HPV protein). This guidance therefore  
180 may encompass future HPV product codes beyond the ones listed. This guidance does not apply  
181 to HPV-associated biomarkers (e.g., p16).  
182

### 183 **IV. Risks to Health**

184  
185 Failure of devices for the detection, or detection and differentiation, of human papillomaviruses  
186 to perform as expected, or failure to correctly interpret results may lead to incorrect patient  
187 management decisions in cervical cancer screening and treatment. False negative results may  
188 lead to delays in the timely diagnosis of cervical cancer and treatment, allowing an undetected  
189 condition to worsen and potentially increasing morbidity and mortality. False positive results  
190 could lead many women to unnecessarily undergo more frequent screening and potentially  
191 invasive procedures such as colposcopy and biopsy. False positive results for the highest risk  
192 types of HPV, such as HPV 16 and/or 18, could lead to unnecessarily aggressive treatment of  
193 cervical lesions that may impair fertility. Because cervical cancer screening is recommended for  
194 virtually all sexually active women and a substantial number of these women will be tested for  
195 HPV, the risk scale for potential harm to public health from false negative and false positive  
196 HPV results is significant. Therefore, establishing the performance of these devices and  
197 understanding the risks that might be associated with the use of these devices is critical to their  
198 safe and effective use.  
199

200 The studies that are submitted in a PMA to establish the performance of HPV detection devices  
201 are a key factor for determining the safety and effectiveness of these devices.  
202

## 203 **V. Device Description**

204  
205 You should provide in your PMA a device description that includes information sufficient to  
206 understand what the proposed device is and how it works, such as:

- 207 • A description of the device in text and with pictures, diagrams, and/or engineering  
208 drawings, as applicable.
- 209 • An explanation of the mechanism of action and principles of operation.
- 210 • Characteristics of the device output (i.e. whether or not genotypes can be differentiated,  
211 genotypes assessed simultaneously vs. individually in a well or channel, etc.).
- 212 • A detailed technical description of the device including instruments, reagents,  
213 components, software, and accessories.
- 214 • The proposed indications for use of the device (including sample type(s) and collection  
215 devices).

## 216 **VI. Test Methodology**

217 You should describe, in detail, the methodology used by your device in your PMA. You should  
218 describe the following elements, as applicable to your device:

- 219 • Test platform.
- 220 • Information and rationale for selection of specific target sequences and the methods used  
221 to design detection elements.
- 222 • Specimen collection and handling methods.
- 223 • All pre-analytical methods and instrumentation for collection, stabilization, and  
224 concentration of specimens, as appropriate.
- 225 • Limiting factors of the assay (e.g., saturation level, maximum cycle number, etc.).
- 226 • Reagent components provided or recommended for use, and their function within the  
227 system (e.g., buffers, enzymes, fluorescent dyes, chemiluminescent reagents,  
228 oligonucleotides, other signaling/amplification reagents, etc.).
- 229 • The potential for specific and non-specific interference effects from reagents or device  
230 material.
- 231 • Internal controls and a description of their specific function in the system.
- 232 • External controls that you recommend or provide to users.
- 233 • Instrumentation inherent to using your device, including the components and their  
234 function within the system.
- 235 • The computational path from raw data to the reported result (e.g., how raw signals are  
236 processed and converted into a useable result). This would include adjustment for  
237 background and normalization, if applicable. Show how results are reported and  
238 interpreted.
- 239 • Illustrations, photographs, and a detailed description of non-standard equipment or  
240 methods, as appropriate.

241 **VII. Establishing Performance Characteristics**

242

243 **A. Analytical Studies**

244

245 You should provide in your PMA analytical studies that conform to the following  
246 recommendations.

247

248 **(1) Limit of Detection**

249

250 FDA (or “we”) recommends that you determine the limit of detection (LoD) of your device using  
251 serial dilutions of HPV genomic DNA or RNA transcripts, as appropriate, in sample collection  
252 buffer. Genomic DNA or RNA transcripts, or both, can be cloned or synthesized material, since  
253 HPV cannot be cultured. We recommend that you determine the LoD for each HPV genotype  
254 and each specimen collection media tested by the device.

255

256 If your assay is indicated for testing with liquid-based cytology (LBC) specimens, and involves  
257 centrifugation of the cervical cytology sample and removal of the LBC collection media  
258 (supernatant) prior to processing for HPV testing, you should perform your LoD studies in  
259 whatever matrix or buffer the cells are re-suspended in after the centrifugation step. If you use  
260 LBC mock-samples containing HPV-infected cell lines in any of your analytical studies (as  
261 recommended under Section VII(A)(2) “Precision” below), then you should also perform LoD  
262 studies with these types of samples. A human HPV-negative cell line is recommended to serve  
263 as a surrogate for non-HPV infected cells in LBC samples contrived from HPV-infected cell  
264 lines (i.e., SiHa and HeLa cell lines). You should conduct a paired sample LoD study with at  
265 least one of these HPV-infected cell lines showing that you get the same LoD results in both a  
266 pooled negative clinical and simulated background matrix (i.e., an HPV negative cell line in  
267 LBC media). If these two samples demonstrate equivalence then a negative cell line can be used  
268 as the background in other analytical studies.

269

270 We recommend that you first define a cutoff for the numerical signal (i.e., the limit of blank  
271 (LoB)) such that a signal above the LoB in a patient sample indicates that the virus was detected.  
272 You should also estimate the level of virus that gives a 95% detection rate (the LoD). There are  
273 two different types of devices to consider when establishing the cut-off. One type covers devices  
274 for which a distribution of numeric signals are obtained when repeatedly testing samples known  
275 to have zero concentration (true absence of targeted analyte). For this device type, LoB is a  
276 threshold for numeric signal with a pre-defined type I error (typically 5%), such that samples  
277 with a numeric signal above the LoB are considered as “HPV detected”. For the second type of  
278 device, the ultrasensitive devices, samples with zero analyte concentration almost always have  
279 “HPV not detected” results (type I error is close to zero).

280

281 We suggest that you refer to the Clinical and Laboratory Standards Institute (CLSI) document  
282 EP17-A2 [Ref. 4] for the basic concepts, design, and statistical analysis of your LoD studies. For  
283 the first type of device described above, you can use the approach described in CLSI EP17-A2,  
284 and by Linnet and Kondratovich [Ref. 5] to estimate the LoD using the standard deviation of

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285 samples with very low concentrations. For the second type of device, the LoD can be estimated  
286 from Probit analysis using hit rates (percent of virus detected) of different dilutions [Ref. 6]. Hit  
287 rates for these dilutions should cover a large part of the range of detection (0% detection to 100%  
288 detection). The LoD should be confirmed by preparing at least 20 additional replicates at the  
289 LoD concentration and demonstrating that the virus was detected 95% of the time. The LoD  
290 study should include serial dilutions of each targeted HPV genotype, cell line, or specimen type.  
291 In both approaches to LoD estimation, the appropriate sources of variability should be included  
292 in the LoD study by testing 3-5 samples over 3-5 days with 2-3 lots of your device.

293  
294 Please note that the clinical cutoff, which defines positive and negative results for the HPV test  
295 on clinical samples, can be higher than the LoB, which analytically defines whether the HPV  
296 virus is present or absent. The  $C_{95}$  concentration is the concentration of analyte just above the  
297 clinical cutoff such that results of repeated tests of this sample are positive approximately 95% of  
298 the time. When the LoB is used as a cutoff, then the concentration  $C_{95}$  is the same as the LoD.  
299 For an HPV assay in which the clinical cutoff is higher than the LoB, the concentration  $C_{95}$  may  
300 differ from the LoD concentration.

301

302 **(2) Precision**

303

304 **a. Samples for within-laboratory precision/repeatability studies**

305

306 For establishing the precision of HPV tests, you should create 10-20 precision panel members  
307 with defined analyte levels and HPV genotype(s). You should establish performance using  
308 specimens with analyte levels that challenge medical decision points, in addition to specimens  
309 with moderate analyte levels (as described below). Since HPV cannot be cultured, HPV-infected  
310 human cell lines (as well as human HPV-negative cell lines) can be used to create panel  
311 members that mimic clinical specimens and contain a targeted level of HPV analyte. Utilizing  
312 cell lines is important for LBC specimens since this helps to account for some of the variability  
313 that arises due to the sampling and processing of a heterogeneous suspension of cells. When an  
314 HPV genotype that you intend to claim to detect is not readily available as an infected cell line,  
315 you may also use contrived panel members derived from HPV DNA plasmids or RNA  
316 transcripts, as appropriate. In addition to these contrived samples with defined levels of HPV  
317 infected cells or HPV nucleic acid, you should include four or more real clinical samples with  
318 signal levels that challenge the assay clinical cutoff, plus at least one clinical sample negative for  
319 HPV in your precision study panels. Real clinical samples should be used since cell lines and  
320 plasmids alone cannot address all the variability present in clinical samples. Clinical samples  
321 can be pooled to create sufficient volume and to achieve desired levels of virus concentrations.  
322 In some instances, pooling of clinical samples may significantly increase the variability  
323 observed; in that event, you should contact FDA to discuss alternative study designs using  
324 individual clinical samples. Viral load cannot be defined for clinical specimens, but you should  
325 challenge medical decision points [i.e., clinical cutoff(s)] by including specimens that test  
326 positive and/or negative only a fraction of the time (the exact value of this fraction is not critical,  
327 anything from 5 to 95% positivity is acceptable). This way, the end user can see what output  
328 signal levels have a degree of variability associated with their qualitative results. Panel members  
329 derived from cell lines and/or real clinical samples should be processed as real LBC specimens,

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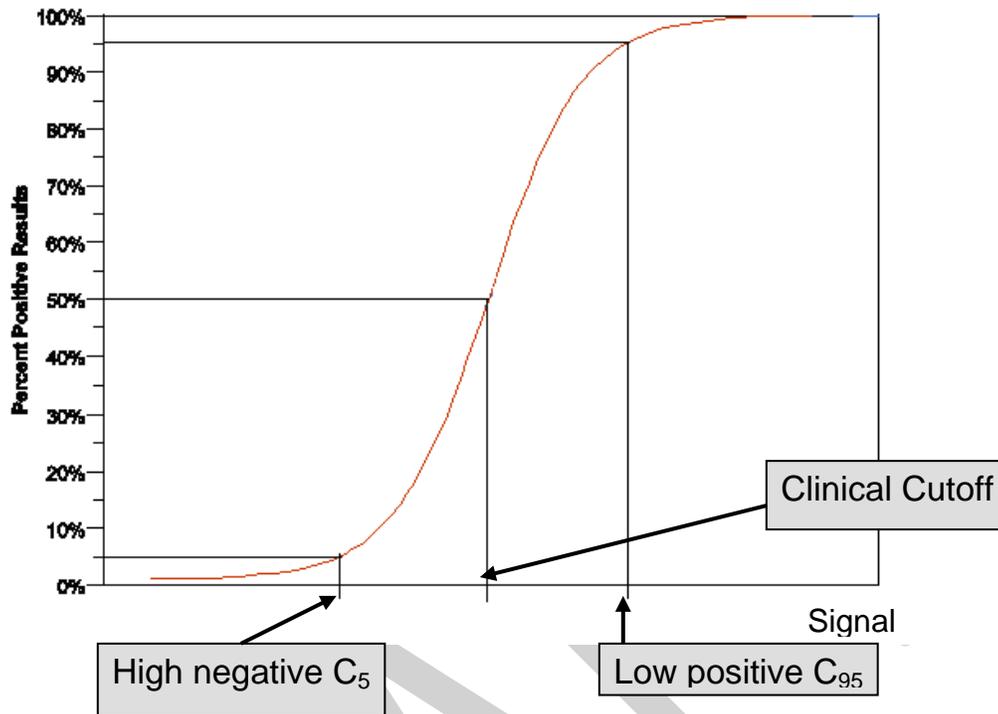
330 starting from suspension in LBC media before the nucleic acid extraction step. If you wish to  
331 utilize a precision panel composed entirely of real clinical specimens (without any simulated  
332 specimens), please contact FDA to discuss recommendations for additional characterization of  
333 such specimens.  
334

335 We recommend that you conduct within-laboratory precision studies for devices that include  
336 complex instruments or automated components. You should include sources of variability (such  
337 as operators, days, instruments, assay runs, etc.) encompassing a minimum of 12 days (not  
338 necessarily consecutive), with two runs per day, and two replicates of each sample per run. You  
339 should assess precision between three reagent lots; there should be no redundancies in the  
340 individual reagent lots evaluated within each kit lot, or in any calibrators or controls that are sold  
341 separately. Between-instrument imprecision can be evaluated during your in-house precision  
342 study, but is more commonly assessed during a sponsor’s reproducibility study (as described  
343 below in Section VII(A)(2)(b) “Reproducibility”).  
344

345 For simulated precision panel members, the test panel should include at least six samples (two  
346 HPV genotypes) at three levels of viral load as described below (also see Chart 1):  
347

- 348 • A **“zero concentration” sample** with no analyte present.
  - 349 • A **“high negative” sample** aiming to represent the analyte concentration below the  
350 clinically established cut-off such that results of repeated tests of this sample are negative  
351 *approximately* 95% of the time and results are positive *approximately* 5% of the time, C<sub>5</sub>  
352 concentration (e.g., for real-time PCR assays, a sample with an analyte concentration not  
353 more than 10 fold below the clinical cutoff of the assay).
  - 354 • A **“low positive” sample (C<sub>95</sub> concentration)** with a concentration of analyte just above  
355 the clinical cut-off such that results of repeated tests of this sample are positive  
356 *approximately* 95% of the time.
  - 357 • A **“moderate positive” sample** with a concentration at which one can anticipate positive  
358 results *approximately* 100% of the time (e.g., *approximately* two to three times the  
359 concentration of the clinical cut-off).
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374

Chart 1. Three Levels for Precision Studies



When the LoB is used as a clinical cutoff, then the concentration  $C_{95}$  is the same as the LoD and the zero concentration (no analyte present in sample) is  $C_5$  [Ref. 4]. CLSI documents EP05-A3 [Ref. 7] and EP12-A2 [Ref. 8] contain further information about designing and performing precision studies.

For precision studies, it is not necessary to have the high negative and low positive samples at exactly  $C_5$  or  $C_{95}$ . If the high negative and low positive samples in the precision study are close enough to the cutoff that the standard deviation (or percent coefficient of variation (%CV)) is approximately constant over the range around the cutoff, the  $C_5$  and  $C_{95}$  can be evaluated from this within-laboratory precision study.<sup>1</sup> The objective of estimating the  $C_5$  and  $C_{95}$  concentrations in this manner is to ensure that your precision panel members are adequately challenging your medical decision points.

**b. Reproducibility**

<sup>1</sup> If the standard deviations (SD) in the precision studies for concentrations around the cutoff value ( $C_{50}$ ) are almost constant, then:  $C_{95} = C_{50} + 1.645 \times SD$ , and  $C_5 = C_{50} - 1.645 \times SD$ . If the coefficient of variation (CV) in the precision studies for concentrations around the cutoff value are almost constant, then  $C_{95} = C_{50} + 1.645 \times CV \times C_{95}$  and  $C_5 = C_{50} - 1.645 \times CV \times C_5$ . From here,  $C_{95} = C_{50} / (1 - 1.645 \times CV)$  and  $C_5 = C_{50} / (1 + 1.645 \times CV)$ .

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412 The protocol for the reproducibility study may vary slightly depending on the assay format. We  
413 recommend the following protocol:

- 414 • Evaluate the reproducibility of your test at three testing sites (e.g., two external sites and  
415 one internal site).
- 416 • Use a five day testing protocol, including a minimum of two runs per day (unless the  
417 assay design precludes multiple runs per day) and three replicates of each panel member  
418 per run.
- 419 • Each day have at least two operators at each facility perform the test.
- 420 • Each sample in the reproducibility study should have at least 90 measurements.
- 421 • Use the sample panel as described in the within-laboratory precision study above (include  
422 C<sub>5</sub> and C<sub>95</sub> samples estimated from the within-laboratory precision internal study in your  
423 reproducibility study). For your reproducibility study, the cell line panel members and  
424 the clinical sample panel members should be processed for each run starting from the  
425 nucleic acid extraction step with an independent extraction for each run.
- 426 • Between-instrument imprecision is often assessed as part of a sponsor's reproducibility  
427 study (rather than during in-house precision testing) by having each site conduct testing  
428 using a different instrument. With this design, instrument precision is confounded with  
429 site precision and if significant differences in precision are observed between the  
430 different sites, it is the sponsor's responsibility to conduct another study to determine if  
431 this imprecision is attributable to the sites or the instruments.

432

#### 433 **c. Presentation of precision studies results**

434

435 For each sample tested in the precision studies (within-laboratory internal precision study and  
436 reproducibility study), we recommend you present the mean value of the signal with variance  
437 components (standard deviation and percent CV). In addition, you should include the percent of  
438 values above and below the cutoff for each sample in the precision studies. For the  
439 reproducibility study, present the mean value with variance components and percent of values  
440 above and below the cutoff for each site separately and for the combined data.

441 We recommend you consult the CLSI documents EP05-A3 [Ref. 7] and EP15-A3 [Ref. 9] for  
442 additional information on reproducibility study design and statistical analysis.

443

### 444 **(3) Cross-Reactivity**

445

446 We recommend that you test your device for potential cross-reactivity with other organisms  
447 known to colonize the genital tract, including human pathogens that are transmitted by sexual  
448 contact. We recommend that you test medically relevant levels of viruses and bacteria (usually  
449 10<sup>5</sup> pfu/ml or higher for viruses and 10<sup>6</sup> cfu/ml or higher for bacteria). We recommend that you  
450 confirm the virus and bacteria identities and titers. Titers in particular are usually estimated by  
451 suppliers but are not guaranteed. The microorganisms recommended for cross-reactivity studies  
452 are listed below in Table 1. Specific species are recommended according to prevalence, clinical  
453 relevance, or both, but additional species may also be tested at the discretion of the sponsor. Any  
454 additional species selected should be known to colonize the genital tract. Additional organisms

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455 should be tested if there is reason to suspect that cross-reactivity may occur (i.e., clinical  
456 evidence of cross-reactivity, homology to chosen probe/primer sequences, etc.).

457  
458 For devices that target a group of HPV genotypes but do not differentiate among them, you  
459 should test the most closely related and/or clinically significant non-targeted HPV genotypes for  
460 cross-reactivity. For devices that detect more than one genotype of HPV and further differentiate  
461 among them, you should test for cross-reactivity among targeted genotypes. Since HPV cannot  
462 be readily cultured, HPV genotypes may be tested as cloned genomic HPV DNA in plasmids or  
463 in vitro transcripts, depending upon your targeted analyte.

464  
465 **Table 1. Microorganisms Recommended for Analytical Specificity (Cross-reactivity)**  
466 **Studies.**  
467

Organism	
<b>Bacteria:</b>	<b>Human Papillomaviruses:</b>
<i>Lactobacillus acidophilus</i>	All non-targeted alpha-HPV genotypes. Alpha HPV genotypes include the following: HPV 16, 18, 26, 30, 31, 33, 34, 35, 39, 45, 51, 52, 53, 56, 58, 59, 66, 67, 68, 69, 70, 73, 82, 85
<i>Staphylococcus epidermidis</i>	
<i>Staphylococcus aureus</i>	
<i>Streptococcus faecalis</i>	
<i>Streptococcus pyogenes</i>	Any non-targeted genital HPV genotypes that are likely to cross-react with your assay based on probe-homology analysis (such as blast search results).
<i>Streptococcus agalactiae</i>	
<i>Corynebacterium</i> spp.	
<i>Chlamydia trachomatis</i>	
<i>Neisseria gonorrhoeae</i>	<b>Other Viruses:</b>
<i>Escherichia coli</i>	Adenovirus
<i>Enterococcus</i> spp.	Cytomegalovirus
<i>Clostridium</i> spp.	Epstein Barr virus
<i>Peptostreptococcus</i> spp.	Herpes simplex virus 1
<i>Klebsiella</i> spp.	Herpes simplex virus 2
<i>Enterobacter</i> spp.	
<i>Proteus</i> spp.	
<i>Pseudomonas</i> spp.	
<i>Bacteroides</i> spp.	<b>Other:</b>
<i>Bifidobacterium</i> spp.	<i>Candida albicans</i>
<i>Fusobacterium</i> spp.	<i>Trichomonas vaginalis</i>

468  
469 **(4) Interference**  
470

471 We recommend that you conduct a comprehensive interference study using medically relevant  
472 concentrations of the interferent and at least one of the most clinically relevant HPV genotypes  
473 (such as HPV 16 or HPV 18) to assess the potentially inhibitory effects of substances  
474 encountered in cervical specimens.

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475  
476 Potentially interfering substances include, but are not limited to, the following: whole blood  
477 (human), leukocytes, contraceptive and feminine hygiene products. The active ingredients and  
478 brand names of selected products and tested concentrations should be provided in your labeling.  
479 Examples of potentially interfering substances are listed in Table 2 below. We recommend that  
480 you test for interference using specimens with analyte levels that challenge medical decision  
481 points around the clinical cutoff (e.g.,  $C_{95}$ ). We also recommend that you evaluate each  
482 interfering substance at its potentially highest concentration (i.e., “the worst case”). One way of  
483 accomplishing this is to dip a specimen collection device directly into the potentially interfering  
484 substance and subsequently place the collection device into one aliquot of a split test specimen.  
485 The other aliquot would be tested without the potential interferent so that the signal between the  
486 paired samples can be compared. In this approach, both aliquots (with and without the potential  
487 interferent) are tested in the same manner as patient specimens with adequate replication (at least  
488 four to seven replicates) within one analytical run. An estimate of the observed interference  
489 effect as the difference between the means of the two aliquots is computed and the 95% two-  
490 sided confidence interval for the interference effect is calculated. If no significant clinical effect  
491 is observed, no further testing is indicated. We recommend that you refer to the CLSI document  
492 EP07-A2 [Ref. 10] for additional information on interference testing.

493  
494 **Table 2. Substances Recommended for Interference Studies.**  
495

<b>Substance</b>
Whole blood (human)
Leukocytes ( $1 \times 10^6$ cells/ml)
Contraceptive jelly
Douche
Anti-fungal cream
Spermicide
Vaginal lubricant
Feminine spray
Intravaginal hormones
Mucus

496  
497 **(5) Carry-Over and Cross-Contamination Studies (for devices with**  
498 **automated liquid handling systems)**  
499

500 We recommend that you demonstrate that carry-over and cross-contamination will not occur  
501 with your device under your recommended instructions for use. In a carry-over and cross-  
502 contamination study, we recommend that high positive samples be used in series alternating with  
503 negative samples in patterns dependent on the operational function of the device. At least five  
504 runs with alternating high positive and negative samples should be performed. We recommend  
505 that the high positive samples in the study be high enough to exceed 95% or more of the results

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506 obtained from specimens of diseased patients in the intended use population. The carry-over and  
507 cross-contamination effect can then be estimated by the percent of negative results for the  
508 negative samples that are adjacent to high positive samples in the carry-over study compared to  
509 the percent of negative results in the absence of adjacent high positive samples (i.e., only  
510 negative samples are run on the plate). For additional detail, see Haeckel [Ref. 11]. For devices  
511 that are indicated for HPV testing of residual cytology samples, an analysis of the carryover  
512 effects of any upstream automated cytology processing system(s) should be provided.  
513

514 **(6) Specimen Storage and Shipping Conditions**  
515

516 For your recommended specimen storage conditions, you should demonstrate that your device  
517 generates equivalent results to time zero for the stored specimens at several time points  
518 throughout the duration of the recommended storage. Storage temperatures evaluated should  
519 represent each extreme of your recommended temperature range. You should establish your  
520 specimen storage and shipping conditions utilizing a panel of real clinical samples that represent  
521 the specimen types claimed in your intended use and analyte levels that challenge the medical  
522 decision point(s) of your assay. The percent change in signal (when compared to time zero)  
523 should be presented for each panel member at each time point tested, as well as for all panel  
524 members combined. Using regression analysis, each sample should be analyzed separately such  
525 that the absolute and percent difference in signal between the recommended storage time and  
526 time zero ( $T_0$ ) should be calculated with a 95% confidence interval. Similar regression analysis  
527 should be performed for all panels combined. For these studies, detailed information about the  
528 samples used should be recorded and included in your submission. In particular, we recommend  
529 you submit the date the specimens were collected from patients in relation to their test date in the  
530 clinical study, and also in relation to when they are utilized to establish  $T_0$  for your stability  
531 studies (among those used to establish stability).  
532

533 **(7) Reagent Storage and Shipping Conditions**  
534

535 For your recommended reagent storage conditions, you should demonstrate that your device  
536 generates equivalent results to time zero utilizing the stored reagents at several time points  
537 throughout the duration of the recommended storage. Storage temperatures evaluated should  
538 represent each extreme of your recommended temperature range. We recommend that you refer  
539 to the CLSI document EP25-A [Ref. 12] for additional information. Accelerated stability studies  
540 are appropriate for estimating reagent stability, but the data provided in your submission should  
541 show real-time performance. You should establish your reagent storage and shipping conditions  
542 utilizing the specimen types claimed in your intended use and analyte levels that challenge the  
543 medical decision point(s) of your assay. The percent change in signal (when compared to time  
544 zero) should be presented for each panel member at each time point tested, as well as for all  
545 panel members combined. Using regression analysis, each sample should be analyzed separately  
546 such that the absolute and percent difference in signal between the recommended reagent storage  
547 time and  $T_0$  should be calculated with a 95% confidence interval. Similar regression analysis  
548 should be performed for all panels combined.  
549

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550 **(8) Evaluation of HPV Detection in the Clinical Dataset**

551  
552 We recommend that you provide an evaluation of your device's ability to detect the targeted  
553 HPV genotypes in your clinical dataset. One way to do this is to perform an FDA-approved  
554 HPV test that detects the same genotypes as your test, or you may perform PCR followed by  
555 sequencing of the amplicon (PCR/Sequencing) on your clinical specimens and compare these  
556 results to the results of your device. Use of an FDA-approved HPV test is recommended  
557 whenever feasible. Use of a composite HPV comparator that incorporates multiple FDA-  
558 approved HPV test(s) and/or PCR/Sequencing is also an option. The nucleic acid amplification  
559 method used in the composite reference method should be targeted to genomic regions different  
560 from the one probed by your assay. You should provide published literature or laboratory data in  
561 your submission in support of the primers used for amplification.

562  
563 For PCR followed by Sanger sequencing, we recommend that you perform the sequencing  
564 reaction on both strands of the amplicon (bidirectional sequencing) and the generated sequence  
565 should meet all of the following acceptance criteria:

- 566 • Sequence contains a minimum of 100 contiguous bases,
- 567 • Bases have a Quality Value of 20 or higher as measured by PHRED, Applied Biosystems  
568 KB Basecaller, or similar software packages (this represents a probability of an error of  
569 1% or lower), and
- 570 • Sequence matches the reference or consensus sequence, e.g. Expected Value (E-Value) <  
571 10-30 for the specific target for a BLAST search in GenBank,  
572 (<http://www.ncbi.nlm.nih.gov/Genbank/>).

573  
574 As Next Generation Sequencing (NGS), also known as High Throughput Sequencing (HTS),  
575 technologies evolve and mature, they may also be used in the composite reference method.  
576 Comparator methods based on these technologies should be validated and should meet pre-  
577 specified quality metrics. Please contact the FDA Division of Microbiology Devices for  
578 additional information on the use of the NGS/HTS methods in evaluation of your clinical data.

579  
580 A comparison against an FDA-approved HPV genotyping test, or PCR/Sequencing is especially  
581 important for HPV genotyping assays to establish that the correct HPV genotype has been  
582 identified by your device.

583  
584 Please note that there are two scenarios in which the samples are found negative by the HPV test  
585 when the clinical cutoff is set above the LoB: 1) the HPV test detected some amount of analyte  
586 (analyte level is above the LoB) but this amount was below the clinical cutoff that is used to  
587 define positive and negative results ("Detected" in Table 3 below = "LoB<signal<clinical  
588 cutoff") or 2) the HPV test did not detect the analyte of interest ("Not Detected" in Table 3  
589 below = signal≤LoB). For the comparison of the HPV test and an appropriate comparator  
590 discussed above, please describe whether the analyte was detected or not detected for the  
591 samples negative by the HPV test as defined above. You should present the comparison for  
592 ASC-US (Atypical Squamous Cells of Undetermined Significance) and NILM (Negative for  
593 Intraepithelial Lesion or Malignancy) ≥30 populations separately in tables. For a test with only a  
594 primary screening indication for population of women ≥25 years, present the data for NILM and

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595  $\geq$ ASC-US separately and also for an all-comers population which includes NILM,  $\geq$ ASC-US and  
 596 UNSAT (Unsatisfactory cytology results). An example of a data presentation format is provided  
 597 below in Table 3.  
 598

**Table 3. Example of a Data Presentation Format of HPV Detection in the Clinical Dataset.**

		Comparator Result			Total
		High Risk Positive	High Risk Negative	Indeterminate	
HPV Positive					
HPV Negative	Detected				
	Not Detected				
Other (Invalid)					
Total					

602  
 603 Evaluation of HPV detection should be presented for each testing site separately and for each  
 604 type of collection media separately. For the differentiation of HPV genotyping tests, you should  
 605 present the data comparing all outputs of the HPV test versus the same outputs for the  
 606 comparator in a table separately for the ASC-US and NILM  $\geq$ 30 populations. For details, please  
 607 see Section 9 of CLSI MM17-A [Ref. 16].  
 608

609 An example of a data presentation format for an HPV genotyping test with five possible  
 610 outcomes: HPV16 Positive, HPV18 Positive, HPV16 & HPV18 Positive, Negative, and Invalid  
 611 (Indeterminate), is provided in Table 4:  
 612

**Table 4. Example of a Data Presentation Format for HPV Genotyping Test.**

	Comparator Result								
	No High Risk Types	One High Risk Type			Two High Risk Types				Multiple High Risk Types
		16	18	Other	16&18	16&Other	18&Other	Other	
Pos:HPV16									
Pos:HPV18									
Pos:HPV16&18									
Negative									
Other Invalid/Indeterminate									
Total									

615

616 **B. Clinical Performance Studies**

617

618 You should provide in your PMA clinical performance studies that conform to the following  
619 recommendations.

620

621 **(1) Consideration of the Cervical Cancer Screening Guidelines**

622

623 Professional cervical cancer screening guidelines help define the role that an HPV device will  
624 play in the larger scheme of patient management and are therefore useful in assessing any  
625 intended use statement for an HPV device and its supporting data. The guidelines that will be  
626 considered in this guidance are the *2006 Consensus Guidelines for the Management of Women*  
627 *with Abnormal Cervical Cancer Screening Tests* (2006 consensus guidelines) [Ref. 13], along  
628 with the 2012 update to these guidelines (2012 consensus guidelines) [Refs. 23 and 24], which  
629 are the most current consensus guidelines available on cervical cancer screening to date.

630 Consideration should be given to the latest version of the guidelines as the recommendations  
631 may change.

632

633 Although professional guidelines are considered in FDA’s evaluation, intended uses given for an  
634 HPV test are supported primarily by the data submitted for test approval and are generally  
635 limited to the populations and sample types evaluated. Studies should be focused on establishing  
636 a woman’s risk for cervical disease in a given population stratified by the HPV test outcomes.  
637 Intended uses for an HPV test may be written more generally (such as the “adjunct” intended use  
638 below) to allow clinicians the flexibility to utilize this risk information as they deem appropriate,  
639 particularly in the development of future cervical cancer screening guidelines.

640

641 **(2) Intended Use**

642

643 The intended use of your device should drive your clinical study design to assess performance, as  
644 the intended use will ultimately determine how FDA will review your data. Below is an example  
645 of an intended use statement that could be appropriate for a device for detection of HPV:

646

647 The [trade name] HPV Test is a [technology or type of assay] assay for the qualitative  
648 detection of high-risk types of human papillomavirus (HPV) [indicate target, such as  
649 DNA, RNA transcript or protein] in cervical specimens. The HPV types detected by the  
650 assay are the high-risk HPV types [list types –indicate whether test can identify specific  
651 types]. Cervical specimens that may be tested with the [trade name] HPV Test include  
652 [insert sample types that may be tested by assay and types of collection devices which  
653 may be used to collect the samples].

654

655 The use of this test is indicated:

656

- 657 1. To screen patients 21 years and older with atypical squamous cells of undetermined  
658 significance (ASC-US) cervical cytology results to determine the need for referral to  
659 colposcopy.

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2. In women 30 years and older the [trade name] Test can be used with cervical cytology to adjunctively screen to assess the presence or absence of high-risk HPV types. This information, together with the physician’s assessment of cytology history, other risk factors, and professional guidelines, may be used to guide patient management.

Below is an example of an intended use statement that could be appropriate for a device for detection and differentiation of HPV:

669  
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674  
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677

3. In women 25 years and older, the [trade name] Test can be used as a first-line primary cervical cancer screening test to detect high-risk HPV, including genotyping for 16 and 18. Women who test negative for high-risk HPV types by the [trade name] Test should be followed up in accordance with the physician’s assessment of screening and medical history, other risk factors, and professional guidelines. Women who test positive for HPV genotypes 16 and/or 18 by the [trade name] Test should be referred to colposcopy. Women who test high-risk HPV positive and 16/18 negative by the [trade name] Test should be evaluated by cervical cytology to determine the need for referral to colposcopy.

678  
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682

**The first intended use will be referred to as the “ASC-US triage” intended use, the second will be referred to as the “adjunct” intended use and the third will be referred to as the “primary screening” intended use throughout this guidance.** Study design considerations for specific intended uses are described below, following the more general study design recommendations.

683  
684  
685  
686

**(3) Study Design Considerations Common to ASC-US Triage, Adjunct and Primary Screening Intended Uses (and likely any other intended uses):**

687  
688  
689  
690  
691  
692  
693

For general study design guidance, see FDA’s guidance entitled “Design Considerations for Pivotal Clinical Investigations for Medical Devices” (<http://www.fda.gov/downloads/MedicalDevices/DeviceRegulationandGuidance/GuidanceDocuments/UCM373766.pdf>) and FDA’s guidance entitled “Statistical Guidance on Reporting Results from Studies Evaluating Diagnostic Tests” (<http://www.fda.gov/MedicalDevices/DeviceRegulationandGuidance/GuidanceDocuments/ucm071148.htm>).

694  
695  
696

**a. Use of study sites outside the United States (21 CFR 814.15)**

697  
698  
699  
700  
701  
702  
703  
704

If you rely on clinical data gathered in a study conducted outside the United States to support your PMA and not conducted under an investigational device exemption (IDE), you must ensure that the data are scientifically valid and that the rights, safety, and welfare of human subjects have been protected in accordance with 21 CFR 814.15. To serve as the sole basis for marketing approval, your data must be applicable to the intended population and the United States medical practice (21 CFR 814.15(d)(1)). Areas of concern for studies conducted outside the US include prevalence of specific high-risk HPV strains, patient screening intervals, average age of onset of screening and sexual activity, cervical cancer risk, cervical sampling methods, differences in

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705 medical or clinical practice, and ethnicity. We encourage contacting FDA through the pre-  
706 submission process if you intend to seek approval based on foreign data, thus reducing the risk  
707 that the foreign study will not support your intended uses.

708  
709 For additional information about the pre-submission process, see FDA’s guidance entitled  
710 “Requests for Feedback on Medical Device Submissions: The Pre-Submission Program and  
711 Meetings with Food and Drug Administration Staff”  
712 ([http://www.fda.gov/downloads/MedicalDevices/DeviceRegulationandGuidance/GuidanceDocu](http://www.fda.gov/downloads/MedicalDevices/DeviceRegulationandGuidance/GuidanceDocuments/UCM311176.pdf)  
713 [ments/UCM311176.pdf](http://www.fda.gov/downloads/MedicalDevices/DeviceRegulationandGuidance/GuidanceDocuments/UCM311176.pdf)) prior to beginning the study.

714  
715

**b. Histology review**

716  
717  
718 FDA considers results of colposcopy and biopsy (if necessary) to be the clinical reference  
719 standard (i.e., gold standard) for the disease assessment of subjects in the clinical study. You  
720 may choose to use histology results generated at each of your clinical sites, but we recommend a  
721 centralized three expert pathologist review (CPR) panel that will likely generate a more  
722 consistent and accurate disease assessment for your study. The three pathologists should  
723 distinguish between Cervical Intraepithelial Neoplasia (CIN) 2 and 3, and should not combine  
724 these two categories together for reporting purposes (i.e., results of “CIN2/3” should not be  
725 reported). If you choose to use a centralized panel and/or clinical sites that utilize the new 2-  
726 tiered Lower Anogenital Squamous Terminology (LAST) recommendations [Ref. 25] for  
727 reporting the results of cervical histology (as low-grade squamous intraepithelial lesion (LSIL)  
728 and high-grade squamous intraepithelial lesion (HSIL), such that immunohistochemical staining  
729 for the biomarker p16 is used to clarify any considered intermediate category (CIN2) into either  
730 LSIL or HSIL, then the 3-tiered result (i.e. CIN1, CIN2, or CIN3) based on the review of  
731 hematoxylin and eosin (H&E) stained slides should be denoted along with the 2-tiered diagnosis  
732 which will be based on the review of the H&E and p16 stained slides for every patient. You  
733 should also provide FDA with the analytical validation data for any non-FDA approved p16  
734 assay utilized for cervical histology in your study. Please notify FDA prior to beginning a study  
735 using the LAST recommendations or any other histology reporting that utilizes the p16  
736 biomarker.

737  
738 We recommend that the CPR panel establish the clinical reference standard (i.e., clinical truth)  
739 for the subject and that two of the three expert pathologists review the slide independently in a  
740 masked fashion. If the two pathologists agree, the diagnosis should be considered the clinical  
741 reference standard. If there is no agreement, the third expert pathologist should read the slide  
742 independently in a masked manner. If there is agreement among any of the three expert  
743 pathologist diagnoses, this should be considered the clinical reference standard for the subject. If  
744 there is no agreement after the third pathologist review, all three expert pathologists should  
745 review the slide together at a multi-headed microscope (or equivalent technology) to try and  
746 reach a consensus diagnosis (with majority rule of 2 of the 3 if a complete consensus cannot be  
747 reached). When submitting your data, you should provide information on how discordant  
748 histology results were resolved. If your CPR panel and/or clinical sites are utilizing the new 2-  
749 tiered LAST recommendations, a consensus should be reached among 2 of the 3 pathologists

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750 regarding what the preliminary histopathology diagnosis is prior to p16 staining (i.e., CIN1,  
751 CIN2, CIN3) using the same method for establishing clinical truth among the pathologists as  
752 when p16 is not used, as described above. A final consensus should be reached after the p16  
753 staining is conducted.

754

755 **c. Cytology reporting terminology**

756

757 Collection sites should utilize cytology reporting terminology that can be translated to The 2001  
758 Bethesda System for Reporting Cervical Cytology (2001 Bethesda System), or a more current  
759 Bethesda system if and when available [Ref. 14]. Cytology results should be converted to the  
760 2001 (or more current) Bethesda system before reporting the results to FDA.

761

762 **d. Blinding**

763

764 Investigators, patients, and clinicians (including those conducting colposcopy and histology)  
765 should be blinded to a patient's HPV status until colposcopy/histology is completed to avoid bias  
766 in the study. Additional blinding is recommended for HPV primary screening studies as  
767 described under "Primary Screening Intended Use" in Section VII(B)(8) below.

768

769 Also, the protocol should clearly specify what test results will ultimately be released to the  
770 physician and patient as well as under what circumstances the cytology and HPV results will  
771 become unblinded as that could inadvertently bias your follow-up study.

772

773 **e. Human papillomavirus genotypes**

774

775 For an assay to detect high risk human papillomavirus, the following genotypes categorized as  
776 "carcinogenic" by the World Health Organization International Agency for Research on Cancer  
777 (IARC) should be targeted: 16, 18, 31, 33, 35, 39, 45, 51, 52, 56, 58 and 59 [Ref. 15]. If your  
778 assay does not target any of these recommended HPV genotypes, you should explain why.  
779 Additional genotypes, such as those deemed "probably carcinogenic" or "possibly carcinogenic"  
780 by IARC (i.e. types 66, 68) may also be included. We recommend that you discuss with FDA  
781 the benefits and risks of inclusion of any other human papillomavirus genotypes prior to  
782 beginning your studies.

783

784 **f. Specimen collection media**

785

786 We recommend you perform the described analytical and clinical studies for each type of  
787 specimen collection media (i.e., specific brand of liquid-based-cytology collection fluid) claimed  
788 in your intended use. Clinical performance should be presented for each collection media  
789 separately.

790

791 **g. Specimen collection devices**

792

793 The list of collection devices that may be used to collect specimens for testing by your device  
794 should be described in the intended use statement and should be approved for use with your

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795 indicated cytology method(s). Each claimed collection device (i.e., brush/spatula vs. broom)  
796 need not be evaluated in your analytical studies. However, each indicated collection device  
797 should be evaluated in your clinical studies. Clinical performance should be presented for each  
798 collection device separately.

799

800 **h. Specimen collection – general**

801

802 For each specimen collected in your clinical study you should capture the date the specimen was  
803 collected from the patient, the date it was shipped to and received by the testing laboratory, and  
804 the date the specimen was tested.

805

806 **i. Biopsy methods**

807

808 The biopsy methods utilized should be consistent for all patients and all sites within each study.  
809 If separate studies are conducted for distinct indications (e.g., ASC-US triage vs. adjunct), then  
810 different biopsy methods may be used for each study. If the biopsy method is not consistent  
811 within a dataset for a given indication, it may lead to bias in your study that may prevent proper  
812 establishment of your performance characteristics for that indication. A standardized biopsy  
813 method can have variables associated with it, but these variables should be associated with the  
814 appearance of the cervix upon visualization during colposcopy, such as the presence or absence  
815 of visible lesions, or the visibility of the squamocolumnar junction (SCJ). If additional variables  
816 are desired, you should discuss them with FDA prior to beginning your studies. Note that  
817 biopsies taken from lesioned and non-lesioned areas should be denoted differently on your case  
818 report forms.

819

820 **j. Cytology sample aliquoting**

821

822 Sponsors pursuing intended uses for HPV testing from cytology samples should consider, when  
823 designing their studies, whether they should be testing from pre-aliquoted cytology samples  
824 (aliquot taken prior to slide processing) or working from residual cytology samples (aliquot  
825 taken after slide processing). Pre-aliquoting of cytology samples can only occur if the cytology  
826 collection system has been approved for aliquot removal prior to cytology slide processing. This  
827 will ensure that patient cytology test results are not compromised by inappropriate processing of  
828 their cytology specimens.

829

830 Alternatively, sponsors who seek a claim to work from residual cytology specimens should  
831 analytically assess the effects of carryover during cytology slide processing (see Section  
832 VII(A)(5) “Carry-Over and Cross-Contamination Studies”). Sponsors with amplification assays  
833 who have concerns about contamination may need to work with alternative specimen collection  
834 systems or systems approved for pre-aliquoting to address their contamination issues. Sponsors  
835 who perform their clinical studies on pre-aliquoted cytology specimens who subsequently seek a  
836 claim to test residual cytology specimens should compare the results of a panel of paired pre-  
837 aliquoted and residual real clinical cytology specimens, in addition to conducting the analytical  
838 carryover and cross contamination studies discussed above.

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840 **k. Reporting results for HPV genotyping assays**

841  
842 Results should be reported in a manner readily interpretable by clinicians. Groups of HPV  
843 genotypes with similar risk levels should be reported in groups, instead of individually, where  
844 appropriate.

845 In your PMA, you should describe how each of the reported results or invalid results are  
846 determined, and how they should be interpreted. You should indicate the cut-off values for all  
847 outputs of the assay.

848 If the assay has an invalid result, you should describe how an invalid result is defined. If internal  
849 controls are part of the determination of invalid results, you should provide the interpretation of  
850 each possible combination of control results for defining the invalid result. You should provide  
851 recommendations for how to follow up any invalid result (i.e., whether the result should be  
852 reported as invalid or whether re-testing is recommended).

853 **l. HPV vaccination and study populations**

854  
855 When making sample size estimations, you should consider that as the number of HPV-  
856 vaccinated individuals increases, this will lead to a decrease in the overall prevalence of cervical  
857 disease in the United States. Current estimates of vaccine rates and disease prevalence should be  
858 taken into account when estimating study sample size. Inclusion of study sites with higher than  
859 average levels of non-vaccinated individuals may eventually become advisable as the number of  
860 vaccinated individuals across the US increases. Please note that, in this scenario, study sites with  
861 average levels of vaccinated individuals should also be evaluated. Sponsors considering this  
862 type of design should discuss this option with FDA before beginning their studies.  
863

864 **(4) ASC-US Triage Intended Use**

865  
866 You should conduct prospective clinical studies using specimens representing the intended use  
867 population, i.e. patients with ASC-US cervical cytology results, to determine clinical  
868 performance of your device for all specimen types and specimen collection devices you claim in  
869 your labeling. The clinical performance of a qualitative test (test with two outcomes, Positive or  
870 Negative) is described by its clinical sensitivity and specificity, positive and negative predictive  
871 values, and prevalence. The clinical sensitivity of your device is the proportion of individuals  
872 who have precancer or cancer [greater than or equal to Cervical Intraepithelial Neoplasia 2  
873 ( $\geq$ CIN2)<sup>2</sup>] that are positive by your test. The clinical specificity of your device is the proportion  
874 of individuals who do not have precancer or cancer ( $<$ CIN2) that are negative by your test.  
875 These performance characteristics should be established in prospective clinical studies conducted

---

<sup>2</sup> Please note that for all places in this document where data for the  $\geq$ CIN2 target condition is requested, data for the  $\geq$ CIN3 target condition should also be presented since  $\geq$ CIN3 is more likely to progress to cervical cancer. If you utilize the 2-tiered LAST system, you should also present data for HSIL and above. HSIL in the LAST system is different from HSIL in The 2001 Bethesda System for Reporting Cervical Cytology and this distinction should be made clear by indicating for each table containing "HSIL" results whether cytology or biopsy results are being reported.

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876 at a minimum of three study sites that are representative of clinical sites in the United States. For  
877 a test with more than two outcomes, clinical performance is described by likelihood ratios,  
878 percentage of subjects in each outcome and prevalence.  
879

#### **a. Specimen collection and processing**

880  
881 Proper specimen collection and processing is critical for establishing the performance  
882 characteristics of an HPV test. For an ASC-US triage intended use, the population of women  
883 studied should be recruited from Ob/Gyn clinics. Please note that colposcopy clinics are not  
884 good sources of patients for an ASC-US triage evaluation, as the women who present at  
885 colposcopy clinics have already been determined to be in need of colposcopy (i.e., have already  
886 been determined to be HPV positive by other tests, or repeat ASC-US by cytology). Since  
887 women who are already known to need colposcopy are not the target population for the ASC-US  
888 triage intended use, this population should not be used for your study, as the performance  
889 estimates derived would be inaccurate. The population of women who present at a colposcopy  
890 clinic has a higher prevalence of both HPV infection and cervical disease and, due to verification  
891 bias, device sensitivity would be overstated.  
892

893  
894 For tests that are to be performed directly from liquid-based cytology (LBC) specimens, all  
895 investigative HPV test results should be performed on the same LBC sample that was used to  
896 generate the cytology result. This will enable you to avoid any sampling bias in your study (i.e.,  
897 infections that may resolve between the time the original cytology sample and investigative  
898 sample are taken, removal of a large portion of the HPV infected cells in the first sample, etc.).  
899 Although one approach to mitigating sampling bias when collecting an extra sample is to  
900 randomize the test procedures performed on the two samples (i.e., cytology and HPV testing),  
901 this is not an acceptable approach for generating a cytology result in patients. The first cytology  
902 sample taken from a patient should always be the sample utilized to generate a cytology result,  
903 so that this result (and subsequently, the health of the patient) is not compromised. Therefore,  
904 randomizing testing on two cytology samples would not mitigate sampling bias for HPV studies.  
905

906 One challenge in enrolling patients from Ob/Gyn clinics as opposed to colposcopy clinics is  
907 fielding the large number of women who are not part of the intended use population. If you are  
908 conducting a large study to support multiple HPV testing intended uses, it may be advisable to  
909 enroll all women, regardless of cytology status, into your study. Another option, if the ASC-US  
910 triage intended use is to be pursued in a separate study, is to enroll only patients with ASC-US  
911 cervical cytology results into your prospective clinical study. When utilizing the latter approach,  
912 it is important to establish a procedure for obtaining the original cytology sample that was  
913 originally used to generate the enrollment ASC-US result in order to avoid sampling bias as  
914 described above.  
915

#### **b. Clinical reference (“Gold”) standard**

916  
917 Your study should be designed such that all women with ASC-US cytology from Ob/Gyn clinics  
918 will proceed to colposcopy, regardless of HPV status or other factors. Investigators, patients and  
919

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920 clinicians (including those conducting colposcopy and histology) should be blinded to a patient’s  
921 HPV status until colposcopy/histology is completed to avoid bias in the study.

922  
923 Time elapsed between collection of a screening cervical cytology specimen and subsequent  
924 colposcopy procedures should not exceed 12 weeks. Allowing too much time between these  
925 procedures could result in higher than normal rates of spontaneous regression of HPV infections  
926 and their associated cervical lesions, which will adversely affect your estimates of clinical  
927 sensitivity and specificity.

928  
929 You should describe details of the colposcopy procedures used in your clinical study and the  
930 results of the colposcopy procedures should be categorized as (Negative Colposcopy/No  
931 Biopsy), Negative Biopsy, CIN 1, CIN 2, CIN 3 and Cancer. If you utilize 2-tiered LAST  
932 system, in addition, present the results of the colposcopy procedure as (Negative Colposcopy/No  
933 Biopsy), Negative Biopsy, LSIL, HSIL, and Cancer.

934  
935 **c. Clinical performance evaluation of HPV tests**

936  
937 The clinical performance of a test for the detection of HPV (a qualitative test) is described by its  
938 clinical sensitivity and specificity, and by its positive and negative predictive values, along with  
939 the prevalence of the target condition in the intended use population.

940  
941 An example of an acceptable data presentation format for a qualitative test with two outcomes  
942 (Positive and Negative) is provided below in Table 5:

943  
944 **Table 5.—Table for Qualitative HPV Test Results**

945

	Neg Colpo	Central Histology				
		Neg	CIN1	CIN2	≥CIN3	
HPV Pos	A <sub>1</sub>	A <sub>2</sub>	A <sub>3</sub>	A <sub>4</sub>	A <sub>5</sub>	A <sub>1</sub> +A <sub>2</sub> +A <sub>3</sub> +A <sub>4</sub> +A <sub>5</sub>
HPV Neg	B <sub>1</sub>	B <sub>2</sub>	B <sub>3</sub>	B <sub>4</sub>	B <sub>5</sub>	B <sub>1</sub> +B <sub>2</sub> +B <sub>3</sub> +B <sub>4</sub> +B <sub>5</sub>
Total	A <sub>1</sub> +B <sub>1</sub>	A <sub>2</sub> +B <sub>2</sub>	A <sub>3</sub> +B <sub>3</sub>	A <sub>4</sub> +B <sub>4</sub>	A <sub>5</sub> +B <sub>5</sub>	N

946  
947 The clinical performance of your device for the target condition “CIN2 and above” (≥CIN2)  
948 should be evaluated as follows:

949 Sensitivity =  $(A_4+A_5)/(A_4+A_5+B_4+B_5)$ ;

950 Specificity =  $(B_1+B_2+B_3)/(A_1+A_2+A_3+B_1+B_2+B_3)$

951 Positive Predictive Value (PPV) =  $(A_4+A_5)/(A_1+A_2+A_3+A_4+A_5)$

952 Negative Predictive Value (NPV) =  $(B_1+B_2+B_3)/(B_1+B_2+B_3+B_4+B_5)$

953 Prevalence of ≥CIN2 =  $(A_4+A_5+B_4+B_5)/N$

954  
955 Since CIN3 lesions are more likely to progress to cervical cancer than CIN2 lesions [Ref. 17],  
956 the clinical performance of your device for the target condition “CIN3 and above” (≥CIN3)  
957 should also be presented:

958 Sensitivity =  $A_5/(A_5+B_5)$ ;

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959 Specificity =  $(B_1+B_2+B_3+B_4)/(A_1+A_2+A_3+A_4+B_1+B_2+B_3+B_4)$

960  $PPV=A_5/(A_1+A_2+A_3+A_4+A_5)$

961  $NPV=(B_1+B_2+B_3+B_4)/(B_1+B_2+B_3+B_4+B_5)$

962 Prevalence of  $\geq$ CIN3= $(A_5+B_5)/N$

963

964 The estimates of sensitivity and specificity as well as positive and negative predictive values  
965 should be provided along with 95% two-sided confidence intervals. For the 95% confidence  
966 intervals for sensitivity and specificity, a score method is recommended. For more details about  
967 score confidence intervals, see Section IX Appendix “Statistical Analysis” and CLSI EP12-A2  
968 [Ref. 8]. The confidence intervals for the predictive values can be calculated (when prevalence  
969 is constant) based on the confidence intervals of the corresponding likelihood ratios (an estimate  
970 of the likelihood ratio is a ratio of two independent proportions; therefore, the confidence  
971 intervals for a ratio of two independent proportions can be used; see Section IX Appendix  
972 “Statistical Analysis”).

973

974 The clinical performance for the target condition  $\geq$ CIN2 should be stratified by age. The  
975 prevalence of  $\geq$ CIN2, sensitivity, specificity, PPV and NPV along with 95% CI should be  
976 presented for each of the following age groups: 21-30, 30-39, and >39.

977

#### **d. Sample size**

978

979 When considering sample size for an ASC-US triage intended use, one should consider the  
980 number of samples from ASC-US patients needed to establish point estimates of clinical  
981 sensitivity and specificity, along with the lower limits of 95% two-sided confidence intervals.  
982 Clinical sensitivity for cervical disease ( $\geq$ CIN2) is the most critical performance parameter for an  
983 HPV test, since a false negative HPV test result could lead to delays in cervical cancer detection  
984 and treatment [Ref. 13].

985

986 If the estimated clinical sensitivity, specificity and subsequent positive and negative predictive  
987 value(s) of your device do not meet current performance expectations for HPV testing [Ref. 23  
988 and 24], panel review of your performance data may be necessary to allow assessment of the  
989 clinical effectiveness of your test.

990

#### **e. Selection of appropriate clinical cutoff for HPV tests**

991

992 Selection of the appropriate clinical cutoff can be justified by the relevant levels of sensitivity  
993 and specificity that are based on Receiver Operating Curve (ROC) analysis of pilot studies with  
994 clinical samples. The clinical performance of the HPV test at the selected clinical cutoff is  
995 ideally estimated using a pivotal clinical study. In some circumstances, the clinical cutoff can be  
996 determined during the pivotal clinical study using an unbiased procedure and appropriate sample  
997 size. If the level of sensitivity that is clinically acceptable is pre-specified (e.g., the level of  
998 sensitivity of 93%-95% is clinically acceptable in the intended use population), then the pivotal  
999 study can be used to establish the clinical cutoff corresponding to the pre-specified level of  
1000 sensitivity and to obtain an unbiased estimation of the clinical performance of the HPV test with  
1001 this selected cutoff [Ref. 18 & Ref. 19].

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**(5) ASC-US Population - HPV Tests for Detection and Differentiation (HPV Genotyping Tests)**

The study principles described in the preceding Section VII(B)(4) “ASC-US Triage Intended Use” to establish clinical sensitivity and specificity for  $\geq$ CIN2 in women with ASC-US cytology apply to both dual outcome HPV tests (positive or negative for HPV) and multiple outcome HPV genotyping tests.

A test for the detection and differentiation of HPV genotypes usually has multiple outcomes (e.g., HPV16+, HPV18+, HPV16/18+, etc.). The clinical performance of a test for the detection and differentiation of HPV genotypes is described by the probabilities of a target condition for each outcome of the test, as well as the percent of study subjects with each outcome of the test along with disease prevalence for each outcome.

In addition to establishing clinical sensitivity and specificity for  $\geq$ CIN2 in an ASC-US population for an HPV genotyping test, likelihood ratios for each test outcome and the percent of study subjects with each test outcome should also be established as described below.

An example of an acceptable data presentation format for a HPV genotyping clinical study in the ASC-US population is provided in Table 6 (Example shown has outcomes: HPV16+, HPV18+, HPV16/18+, etc.):

**Table 6.—Data Presentation for HPV Genotyping Test Results**

	Neg Colpo	Central Histology				
		Neg	CIN1	CIN2	$\geq$ CIN3	
Pos:HPV16	A <sub>11</sub>	A <sub>12</sub>	A <sub>13</sub>	A <sub>14</sub>	A <sub>15</sub>	A <sub>11</sub> +A <sub>12</sub> +A <sub>13</sub> +A <sub>14</sub> +A <sub>15</sub>
Pos:HPV18	A <sub>21</sub>	A <sub>22</sub>	A <sub>23</sub>	A <sub>24</sub>	A <sub>25</sub>	A <sub>21</sub> +A <sub>22</sub> +A <sub>23</sub> +A <sub>24</sub> +A <sub>25</sub>
Pos:HPV16&18	A <sub>31</sub>	A <sub>32</sub>	A <sub>33</sub>	A <sub>34</sub>	A <sub>35</sub>	A <sub>31</sub> +A <sub>32</sub> +A <sub>33</sub> +A <sub>34</sub> +A <sub>35</sub>
.....	.....	.....	.....	.....	.....	.....
Total						N

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1029  
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The clinical performance of such a test for the target condition  $\geq$ CIN2 is evaluated by the likelihood ratio for each test outcome X and the percent of study subjects with each test outcome. The likelihood ratio (LR) for the test outcome X, LR(T=X), summarizes how many times more (or less) likely subjects with the disease ( $\geq$ CIN2) are to have that particular result X, Pr(T=X|D+), than subjects without the disease, Pr(T=X|D-): LR(T=X) = Pr(T=X|D+)/Pr(T=X|D-).

The following calculations should also be described in your PMA for HPV genotyping tests:

- The likelihood ratios for each of K outcomes (K is a number of different outcomes) should be calculated along with 95% confidence intervals.

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- In addition to the likelihood ratios, probabilities that a patient has  $\geq$ CIN2 for each of the K outcomes of the test should be calculated along with 95% confidence intervals. As an illustrative example, the probability for Outcome HPV16 pos is evaluated as: Probability ( $\geq$ CIN2|HPV16 pos) =  $(A_{14}+A_{15})/(A_{11}+A_{12}+A_{13}+A_{14}+A_{15})$ .
  - Also present the percent of each of K outcomes in the clinical data set. For example, for outcome HPV16 pos: Probability (HPV16 pos) =  $(A_{11}+A_{12}+A_{13}+A_{14}+A_{15})/N$  (where N is the total number of women with results).
  - In addition, probability of  $\geq$ CIN2 for the combined outcomes HPV16/18+ (HPV16/18 is defined positive if either HPV16+ or HPV18+ or both) should be calculated as: Probability ( $\geq$ CIN2| HPV16/18+) =  $(A_{14}+A_{15}+A_{24}+A_{25}+A_{34}+A_{35})/(A_{11}+A_{12}+A_{13}+A_{14}+A_{15}+A_{21}+A_{22}+A_{23}+A_{24}+A_{25}+A_{31}+A_{32}+A_{33}+A_{34}+A_{35})$  and the percent of the subjects with HPV16/18+ results.
  - Prevalence of disease ( $\geq$ CIN2) should also be calculated.

1053 The confidence intervals for the probabilities of  $\geq$ CIN2 can be calculated based on the  
1054 confidence intervals of the corresponding likelihood ratios.

1055  
1056 In a similar way, the clinical performance of the HPV test should be estimated for the target  
1057 condition  $\geq$ CIN3 (or HSIL and above if 2-tiered LAST system is used).

## 1058 (6) Adjunct Intended Use

### 1059 a. General study design options

1060  
1061 Per the 2012 consensus guidelines [Ref. 23], in women 30 years and older, HPV testing is  
1062 recommended as an adjunct to cytology primarily in women with normal cytology. Establishing  
1063 the clinical sensitivity and specificity of your device in a population of women with normal  
1064 cytology is complicated by the fact that these women are not typically sent for colposcopic  
1065 examination at the time when HPV testing is done due to their low incumbent risk of cervical  
1066 cancer. However, a subset of women with normal cytology will have cervical abnormalities  
1067 ( $\geq$ CIN2) [Ref. 20]. HPV testing may help identify the subset of women 30 years and older with  
1068 normal cytology who are at a higher risk for cervical cancer. To demonstrate that your device is  
1069 capable of identifying this higher risk subset of women, you should estimate the absolute risks  
1070 and the relative risk for  $\geq$ CIN2 in this population for individuals positive vs. negative by your  
1071 assay as described below. Estimating absolute risks and relative risk for this intended use  
1072 population can be accomplished with at least one of the following prospective clinical study  
1073 designs:

- 1074  
1075  
1076
1. Characterize a population of women 30 years and older with normal cytology as positive  
1077 or negative by your investigative device and establish agreement with a valid comparator  
1078 HPV detection device, such as an FDA-approved HPV detection device, or  
1079 PCR/sequencing at baseline; then follow the women at yearly time intervals for a  
1080 minimum of three years. See Section VII(A)(8) "Evaluation of HPV Detection in the  
1081 Clinical Dataset" above for more details on the baseline analysis of the prospective  
1082 clinical dataset with respect to HPV detection. All women who develop abnormal  
1083

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1084 cytology ( $\geq$ ASC-US) during follow-up should be sent to colposcopy regardless of their  
1085 HPV status. Unlike option two below, women with normal cytology are not sent to  
1086 colposcopy with this study design, particularly if the decision to send to colposcopy is  
1087 based on investigative or approved HPV test results<sup>3</sup> at the baseline visit or during  
1088 follow-up (this is important for avoiding bias). Note that follow-up will end for women  
1089 who have a  $\geq$ CIN2 colposcopy result at any time during the study and that these women  
1090 are considered “disease positive.” Women who go to colposcopy but are  $<$ CIN2 should  
1091 continue to be followed for the remainder of the study duration. The follow-up data  
1092 should demonstrate a statistically and clinically significant difference in relative risk for  
1093  $\geq$ CIN2 at least at three years for women who are positive as compared to women who are  
1094 negative by your device at enrollment. In addition, the absolute risk of  $\geq$ CIN2 at three  
1095 years for the women who were negative by your test at the baseline should be evaluated  
1096 along with 95% confidence interval. The data should demonstrate that this absolute risk  
1097 is low enough to ensure your test can be safely used for adjunctive screening in women  
1098 30 and older. In addition, present the overall risk of  $\geq$ CIN2 (regardless of the HPV status  
1099 at the baseline). The data analysis should be stratified by age groups (30-39 years and  
1100 40+ years). The longitudinal follow-up portion of this study may potentially be  
1101 conducted post-approval (see “Longitudinal follow-up” Section VII(B)(6)(c) below for  
1102 more details).

1103  
1104 2. Characterize a population of women 30 years and older with normal cytology as positive  
1105 or negative by your device at baseline, then send a subset of those women to colposcopy.  
1106 You should also establish agreement with a valid comparator HPV detection device with  
1107 this second study design option, but a smaller subset of samples may be evaluated since  
1108 you will have more information on risk of  $\geq$ CIN2 at baseline. It is recommended you  
1109 send all HPV positive women (by investigative and/or approved tests) and a random  
1110 subset of HPV negative women to colposcopy. The data should demonstrate a  
1111 statistically and clinically significant difference in relative risk for  $\geq$ CIN2 for women  
1112 who are positive vs. negative by your device at enrollment. Using multiple imputation,  
1113 absolute risks of  $\geq$ CIN2 for the subjects positive and negative by your device should be  
1114 calculated. For the HPV test for detection and differentiation, the data should also  
1115 demonstrate that the absolute risk of  $\geq$ CIN2 at the baseline for some positive outcomes is  
1116 high enough to demonstrate effectiveness of the test in the intended use population.  
1117 Because only a random sample of HPV negative women will have been sent to  
1118 colposcopic examination, the data have a verification bias and therefore, an appropriate  
1119 statistical method such as multiple imputation [Ref. 21] should be used for calculation of  
1120 the absolute and relative risks.

1121  
1122 **b. Enrollment of “all comers” for adjunct claim:**

1123  
1124 Please note that FDA now recommends that you enroll a population of women 30 years and  
1125 older undergoing routine screening (“all comers”) in your clinical study to evaluate performance

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<sup>3</sup> An exception would be if a woman was twice cytology negative and HPV positive (at consecutive yearly visits) – in this scenario she should be sent to colposcopy per the 2012 consensus guidelines [Ref. 23]. The bias created in this situation is unavoidable as patient health is paramount.

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1126 of an adjunct claim. Women are HPV tested in parallel with cytology under this claim;  
1127 therefore, women with higher grade cytology are included under the adjunct claim. FDA has  
1128 historically allowed sponsors to submit only the actionable data on the NILM  $\geq 30$  women, but  
1129 FDA is now considering that 1) the results of an HPV test in women with higher grade cytology  
1130 ( $>ASC-US$ ) is proving to be an important safety signal in terms of how well the test is working  
1131 overall, 2) a study size that includes all comers  $\geq 30$  years old includes approximately 3% of  
1132 women with  $>ASC-US$  cytology and these women usually have colposcopy/biopsy results  
1133 according to the current medical practice, and 3) the 2012 guidelines are including more  
1134 actionable combinations of HPV and cytology results that result from co-testing. In light of this,  
1135 FDA will be evaluating all cytology categories when reviewing data to support the adjunct claim  
1136 going forward to ensure the safety and effectiveness of HPV IVD devices. Women with  $\geq ASC-$   
1137 US cytology in the “all comers” adjunct study population should be sent immediately to  
1138 colposcopy. All patients in the adjunct study population who go to colposcopy but do not have  
1139 histology  $\geq CIN2$  by the CPR panel should be invited to participate in the three year longitudinal  
1140 study.

1141

1142 **c. Longitudinal follow-up**

1143

1144 Given that establishing clinical sensitivity and specificity in a population of women with normal  
1145 cytology involves either a very large sample size and/or long term patient follow-up, the FDA  
1146 has considered options that would allow faster access to these important devices while assuring  
1147 their safety and efficacy. The FDA believes that in cases where an HPV test is receiving, or has  
1148 received, approval for the ASC-US triage intended use and where the test has shown a high  
1149 degree of clinical sensitivity for cervical precancer/cancer ( $\geq CIN2$ ), there is a high degree of  
1150 confidence that the test performs at a level consistent with current expectations for HPV testing  
1151 [Ref. 2]. In such cases, to receive the adjunctive intended use for the same HPV test, FDA may  
1152 provide for the longitudinal follow-up portion of the adjunctive study described in Option 1 of  
1153 Section VII(B)(6)(a) above to be completed post-market, as long as it has been shown that HPV  
1154 detection by the investigative test in the prospectively collected NILM 30 and older (NILM  $\geq 30$ )  
1155 dataset is comparable to HPV detection in the ASC-US population. In this scenario, the same  
1156 patients from the prospectively collected NILM  $\geq 30$  dataset for whom HPV detection  
1157 characteristics have been established will be followed longitudinally as part of a post-approval  
1158 study to establish the cumulative three year risk of precancer/cancer in patients positive vs.  
1159 negative by the investigative HPV test in this population. This approach will be considered for  
1160 tests that detect HPV types that are supported for use in the NILM  $\geq 30$  population by current  
1161 clinical practice guidelines [Ref 13]. Please note that post-market studies for devices of this type  
1162 are only appropriate when the degree of uncertainty about certain risks or benefits is acceptable  
1163 in the context of the overall benefit-risk profile of the device at the time of premarket approval.  
1164 Also, see FDA’s guidance entitled, “Procedures for Handling Post-Approval Studies Imposed by  
1165 PMA Order”  
1166 (<http://www.fda.gov/MedicalDevices/DeviceRegulationandGuidance/GuidanceDocuments/ucm070974.htm>). Sponsors should contact FDA to discuss their eligibility to complete their  
1167 longitudinal evaluation post-market.  
1168

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1170 **(7) Adjunct Intended Use – HPV Tests for Detection and Differentiation**  
1171 **(HPV Genotyping Tests)**  
1172

1173 The study options described in the preceding Section VII(B)(6) “Adjunct Intended Use” to  
1174 establish relative risk for  $\geq$ CIN2 in women 30 and over with normal cytology can be applied to  
1175 both dual outcome HPV tests (positive or negative for HPV) and multiple outcome HPV  
1176 genotyping tests (tests that not only detect, but also differentiate between the different HPV  
1177 types). The more outcomes an HPV genotyping test has, the more challenging it is to  
1178 demonstrate a statistically significant difference in the relative risk of each outcome.  
1179

1180 In light of recommendations in the 2012 consensus guidelines [Ref. 23], an additional option you  
1181 may wish to pursue for an HPV genotyping assay (aside from the more general adjunct screening  
1182 intended use) is a specific NILM  $\geq$ 30 colposcopy triage intended use for the highest risk HPV  
1183 genotypes, such as HPV 16 and 18. The principles of this type of study design and evaluation  
1184 would be very similar to ASC-US triage, except that you would be dealing with a different study  
1185 population and test outcomes. If you wish to pursue such an intended use, please contact FDA  
1186 for further assistance.  
1187

1188 **a. HPV testing in women 30 and over with >ASC-US cytology**  
1189

1190 In order to allow for parallel cytology and HPV testing, an adjunct intended use need not be  
1191 limited to women with normal cytology (i.e., there is no need to wait for the cytology result to  
1192 order an HPV test). For all HPV devices with an adjunct intended use, the labeling should  
1193 indicate that a negative HPV result for a woman 30 years and older with >ASC-US cytology  
1194 should not prevent women from going to colposcopy.  
1195

1196 **(8) Primary Screening Intended Use**  
1197

1198 An advisory meeting of the Microbiology Panel was held on March 12, 2014 which resulted in a  
1199 newly approved indication for an HPV diagnostic device: Primary Cervical Cancer Screening. If  
1200 you are interested in pursuing a primary screening claim, we recommend you review the  
1201 information on this meeting, which can be found on the CDRH Website at  
1202 <http://www.fda.gov/AdvisoryCommittees/CommitteesMeetingMaterials/MedicalDevices/MedicalDevicesAdvisoryCommittee/MicrobiologyDevicesPanel/ucm388531.htm>  
1203  
1204

1205 To evaluate an HPV primary screening indication, you should characterize a population of  
1206 women 25 years and older undergoing routine screening (an all comers approach) as HPV  
1207 positive or negative by your device at baseline, then send a subset of those women to  
1208 colposcopy. It is recommended you send all HPV positive (by investigative and/or approved  
1209 tests), cytology positive, and a random subset of HPV negative women with normal cytology to  
1210 colposcopy. Women with unsatisfactory (UNSAT) cytology results should also be sent to  
1211 colposcopy to assess the risk of disease in these women stratified by their HPV test results.  
1212

1213 The data should demonstrate that primary HPV screening with your device shows acceptable  
1214 clinical performance in detecting  $\geq$ CIN2 and  $\geq$ CIN3 (sensitivity, specificity, PPV, NPV, absolute

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1215 risk and likelihood ratios) when compared to accepted cervical cancer screening methods [Refs.  
1216 13, 23, 24, and 25]. For tests intended for detection and differentiation, the data should also  
1217 demonstrate that the absolute risk of  $\geq$ CIN2 at the baseline for positive outcomes is high enough  
1218 and the absolute risk of  $\geq$ CIN2 at the baseline for negative outcomes is low enough to  
1219 demonstrate effectiveness of the test in the intended use population. Because only a random  
1220 sample of HPV negative women will have been sent to colposcopic examination, the data will  
1221 have a verification bias, and therefore, an appropriate statistical method such as multiple  
1222 imputation should be used for calculation of the absolute and relative risks [Ref. 21].  
1223

#### **a. Longitudinal follow-up**

1224  
1225  
1226 All patients in the primary screening study population who underwent colposcopic examination  
1227 and did not have histology  $\geq$ CIN2 by CPR should be invited to participate in a three year  
1228 longitudinal study. Subjects in the follow-up study should undergo annual visits for cervical  
1229 sampling for cytology, and all subjects with  $\geq$ ASC-US should be invited to proceed to  
1230 colposcopy. Colposcopy and biopsies should be performed in a standardized manner as  
1231 described in Section VII(B)(3)(b) "Histology review" above. All cervical biopsies should be  
1232 examined by the CPR panel. All subjects with  $\geq$ CIN2 by CPR should exit the study and those  
1233 with  $<$ CIN2 by CPR should be invited to proceed to the next year's follow-up visit. In order to  
1234 maximize disease ascertainment, it is recommended that an exit colposcopy and endocervical  
1235 curettage (ECC) be considered for all follow-up subjects in Year 3.  
1236

1237 You should consider enrolling a random subset of women who were cytology and HPV negative  
1238 (by the investigative device and at least one FDA approved device) and were not selected for  
1239 colposcopy at baseline in a parallel longitudinal study where these women are sent to colposcopy  
1240 after a 3 year screening interval. This will allow a more accurate assessment of  $\geq$ CIN3 risk over  
1241 a three year screening interval for these women. Three year risk estimates for  $\geq$ CIN3 obtained in  
1242 this manner will not be affected by detection and treatment of CIN2 lesions at baseline.  
1243

#### **b. Blinding issues for primary screening study**

1244  
1245  
1246 Investigators, patients, and clinicians (including those conducting colposcopy and histology)  
1247 should be blinded not only to a patient's HPV status, but their cytology status as well, until  
1248 colposcopy/histology is completed to avoid bias in the study. Patients should be flagged as  
1249 requiring colposcopy/histology without specifying the test results associated with the referral.  
1250

1251 Cytologists are intentionally blinded to all other patient test results for a primary HPV screening  
1252 study to avoid biasing their assessment of the cytology slides based on the knowledge of other  
1253 test results (otherwise performance of cytology alone as a comparator algorithm could be  
1254 potentially biased). However, cytology performance could be different in a real-life setting in  
1255 the context of using an HPV test as a primary screening device when cytologists know the HPV  
1256 status of the specimens they are screening. To assess how different the performance of HPV  
1257 primary screening with the investigative device could be in this real-life setting, a subset of  
1258 cytology slides should be re-read at the testing sites with knowledge of the HPV status available

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1259 at the time of the repeat reading. The effect of this un-blinding on the performance of your  
1260 device for HPV primary screening should be determined.

1261

1262 **c. Benefit-risk analysis**

1263

1264 You should evaluate the benefit-risk of your HPV primary screening device for detection of  
1265 high-grade cervical disease (CIN2,  $\geq$ CIN3) relative to current screening methods. To permit an  
1266 evaluation of benefit-risk, you should present estimates of the expected number of tests and  
1267 procedures (number of cytology, HPV tests, and colposcopy procedures), and the expected  
1268 number of true positives, false positives, and false negatives per 10,000 screened women for both  
1269 your device and current screening method(s). This analysis should be performed considering  
1270 both blinded and un-blinded performance estimates for HPV primary screening with regard to  
1271 the cytologists' knowledge of HPV results. For more information, please see FDA's guidance  
1272 entitled "Factors to Consider When Making Benefit-Risk Determinations in Medical Device  
1273 Premarket Approval and *De Novo* Classifications" at  
1274 ([http://www.fda.gov/downloads/MedicalDevices/DeviceRegulationandGuidance/Guidance  
Documents/UCM296379.pdf](http://www.fda.gov/downloads/MedicalDevices/DeviceRegulationandGuidance/GuidanceDocuments/UCM296379.pdf)).

1275

1276 **d. Performance in women with cancer**

1277

1278 Sponsors seeking a primary screening claim should ensure that their test is highly sensitive not  
1279 only for cervical pre-cancer, such as CIN2 and CIN3, but for cervical cancer itself. Therefore,  
1280 additional testing with the investigational device should be conducted on cytology samples  
1281 collected from females who have subsequently been diagnosed with cervical cancer, using  
1282 banked samples from the United States. We recommend submitting a separate protocol for this  
1283 study to FDA for review. In your protocol, please provide information on the collection of these  
1284 samples and a detailed description of how you plan to blind these samples.

1285

1286 **e. General considerations**

1287

1288 Although the basic elements of an HPV primary screening study are provided above, this type of  
1289 study is complex and therefore, it is strongly recommended that any sponsor seeking an HPV  
1290 primary screening indication should submit their detailed clinical protocol to FDA for review via  
1291 the Pre-Submission Program.

1292

1293

1294 **(9) Study Design to Cover All Three HPV Testing Claims (ASC-US Triage,  
1295 Adjunct and HPV Primary Screening)**

1296

1297 Please note that the study design described above to evaluate the HPV Primary Screening  
1298 intended use can also be used to evaluate the ASC-US Triage and Adjunct intended uses, noting  
1299 that some additional women will need to be enrolled who are 21-24 years old with ASC-US  
1300 cytology. These young women with ASC-US can be invited into the study after their cytology  
1301 result is known, and therefore, the number of additional women needed to evaluate all three HPV  
1302 testing claims in a single study will be minimal (i.e. beyond the number needed for a primary  
1303

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1304 screening claim). Please see recommendations under Section VII(B)(4) “ASC-US Triage  
1305 Intended Use” above for considerations when evaluating ASC-US Triage performance from a  
1306 population of women enrolled based on their cytology result (in particular recommendations on  
1307 the source of these specimens).  
1308

1309 **C. Controls**

1310 When conducting the performance studies described above, we recommend that you run  
1311 appropriate external controls every day of testing for the duration of the analytical and clinical  
1312 studies. Since HPV cannot be readily cultured, appropriate external controls include HPV  
1313 genomic DNA contained within plasmids or synthetic HPV RNA transcripts (depending on  
1314 whether your test targets HPV DNA or RNA) in a matrix that mimics clinical samples as closely  
1315 as possible. The HPV genotype(s) selected for use in your controls should be among the most  
1316 clinically relevant HPV genotypes (e.g., HPV 16). As the clinical significance of HPV strains  
1317 shift due to vaccination programs, appropriate control sequences may need to be re-assessed.  
1318

1319 We recommend that you consult with FDA when designing specific controls for your device. If  
1320 your device is based on nucleic acid technology, we recommend that you include the following  
1321 types of controls:

1322

1323 **(1) External Controls**

1324

1325 **a. Negative control**

1326

1327 The negative external control contains an appropriate buffer or sample transport media and is run  
1328 through the entire assay process in the same manner as a clinical specimen. This control is used  
1329 to rule out contamination with target nucleic acid or increased background in the amplification  
1330 and/or detection reaction.

1331

1332 **b. Positive control**

1333

1334 The positive external control contains target nucleic acids at levels approximately two-fold above  
1335 the  $C_{95}$  concentration of the assay in an appropriate buffer or sample transport media, and is run  
1336 through the entire assay process in the same manner as a clinical specimen. For a test that targets  
1337 HPV DNA, the cloned HPV 16 genome in carrier plasmid DNA suspended in sample transport  
1338 media would be an appropriate control. The complete targeted conserved region of the HPV 16  
1339 genome, such as the L1 region, can also be utilized in lieu of a full-length genomic clone. For a  
1340 test that targets HPV RNA transcripts, synthetic full-length transcripts of the targeted genes  
1341 suspended in sample transport media would be an appropriate control. For controls with analyte  
1342 levels that do not adequately challenge medical decision points, as part of ensuring compliance  
1343 with 21 CFR 809.10(b)(8)(vi), the following warning should be included in the labeling:

1344 “The Positive and Negative Controls are intended to monitor for substantial reagent failure. The  
1345 Positive Control should not be used as an indicator for cut-off precision and only ensures reagent

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1346 functionality. Quality control requirements must be performed in conformance with local, state  
1347 and/or federal regulations or accreditation requirements and your laboratory's standard Quality  
1348 Control procedures."

1349 For manufacturers that do not wish to provide external controls, instructions should be included  
1350 in the package insert to instruct end-users how to make their own external controls. This option  
1351 is only appropriate for devices that include an internal positive control for all samples and that do  
1352 not have a primary screening claim.

1353

1354 **(2) Internal Control**

1355

1356 The internal control is a non-target nucleic acid sequence that is co-processed (i.e., extracted and  
1357 amplified) with the target nucleic acid. It controls for integrity of the reagents (polymerase,  
1358 primers, etc.), equipment function (thermal cycler), and the presence of inhibitors in the samples.  
1359 Examples of acceptable internal control materials include human nucleic acid co-processed with  
1360 the HPV and primers amplifying human housekeeping genes (e.g., RNaseP,  $\beta$ -actin). An internal  
1361 control for a human "housekeeping" gene may also help ensure adequate cellular sampling of the  
1362 aliquot material. This type of control is needed for all HPV devices with a primary screening  
1363 claim to help reduce the likelihood of a false negative result; otherwise, the need for this control  
1364 should be determined on a device case-by-case basis [Ref. 22].

1365

1366 **VIII. References**

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1468 **IX. Appendix – Statistical Analysis**  
1469

1470 **Calculating Score Confidence Intervals for Percentages and Proportions**

1471 The following are additional recommendations for performing statistical analyses of percentages  
1472 or proportions. There are several different methods available. We suggest that either a score  
1473 method described by Altman, et al. (Altman D.A., Machin D., Bryant T.N., Gardner M.J. eds.  
1474 *Statistics with Confidence*. 2<sup>nd</sup> ed. British Medical Journal; 2000) or a Clopper-Pearson Method  
1475 (Clopper CJ, Pearson E. The use of confidence or fiducial limits illustrated in the case of  
1476 binomial. *Biometrika* 1934; 26:404-413) be used. The advantages with the score method are that  
1477 it has better statistical properties and it can be calculated directly. Score confidence limits tend  
1478 to yield narrower confidence intervals than Clopper-Pearson confidence intervals, resulting in a  
1479 larger lower confidence limit. Thus when n=70 samples and 65/70=92.9%, the score lower limit  
1480 of two-sided 95% confidence interval is 84.3%. In contrast, the Clopper-Pearson lower  
1481 confidence limit is 84.1%. In this document, we have illustrated the reporting of confidence  
1482 intervals using the score approach. For convenience, we have provided the formulas for the  
1483 score confidence interval for a percentage.

1484 A two-sided 95% score confidence interval for the proportion of A/B is calculated as:  
1485  $[100\%(Q_1 - Q_2)/Q_3, 100\%(Q_1 + Q_2)/Q_3]$ , where the quantities  $Q_1$ ,  $Q_2$ , and  $Q_3$  are computed  
1486 from the data using the formulas below. For the proportion of A/B:

1487  $Q_1 = 2 \cdot A + 1.96^2 = 2 \cdot A + 3.84$

1488  $Q_2 = 1.96 \sqrt{1.96^2 + 4 \cdot A \cdot (B - A) / B} = 1.96 \sqrt{3.84 + 4 \cdot A \cdot (B - A) / B}$

1489  $Q_3 = 2 \cdot (B + 1.96^2) = 2 \cdot B + 7.68$

1490  
1491 In the formulas above, 1.96 is the quantile from the standard normal distribution that corresponds  
1492 to 95% confidence.

1493 For an example of proportion if (65/70),  $Q_1=133.84$ ,  $Q_2=9.28$ , and  $Q_3=147.68$ , then the two-  
1494 sided 95% score confidence interval is 84.3% to 96.9%

1495  
1496 **Calculation of Confidence Intervals for Positive Predictive Value (PPV) and Negative**  
1497 **Predictive Value (NPV) based on Confidence Intervals for Likelihood Ratios (Prevalence is**  
1498 **Constant)**  
1499

1500 PPV is  $(1 + \text{PLR}^{-1} \cdot (1 - \pi) / \pi)^{-1}$ , where PLR is positive likelihood ratio ( $\text{PLR} = \text{se} / (1 - \text{sp})$ ); NPV is  
1501  $(1 + \text{NLR} \cdot \pi / (1 - \pi))^{-1}$ , where NLR is negative likelihood ratio ( $\text{NLR} = (1 - \text{se}) / \text{sp}$ ) and  $\pi$  is  
1502 prevalence. For the calculation of 95% confidence intervals for the likelihood ratios, use  
1503 calculation of confidence intervals for the ratio of two independent proportions (the estimate of  
1504 Se and the estimate of (1-Sp) for PLR and the estimate of (1-Se) and the estimate of Sp for  
1505 NLR). There are several different methods available for calculation of the confidence intervals  
1506 for the likelihood ratios (see Altman D.A., Machin D., Bryant T.N., Gardner M.J. eds. *Statistics*  
1507 *with Confidence*. 2<sup>nd</sup> ed. British Medical Journal; 2000, pages 18-110). We suggest that a score

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1508 method described in paper by Nam (Nam J. Confidence limits for the ratio of two binomial  
1509 proportions based on likelihood scores: non-iterative method. Biom J 1995; 37:375-9) be used.  
1510 Using the 95% confidence interval for the corresponding likelihood ratio, it is easy to calculate  
1511 the 95% CI for the corresponding predictive value where  $\pi$  (prevalence) is a constant.  
1512

1513 **Note:**

1514 Suppose that  $[L, U]$  is a  $1-r$  level confidence interval for  $b$  and suppose that  $G$  is a function  
1515 defined on the parameter space.

1516 If  $G$  is increasing, then  $[G(L), G(U)]$  is  $1-r$  level confidence interval for  $G(b)$ .

1517 If  $G$  is decreasing, then  $[G(U), G(L)]$  is  $1-r$  level confidence interval for  $G(b)$ .

1518 (Functions  $(1+x^{-1}*(1-\pi)/\pi)^{-1}$  and  $(1+x*\pi/(1-\pi))^{-1}$  are monotonic functions when  $\pi$  is a constant.)

DRAFT