

# The Medical Device Manufacturer's Quick Reference Guide to

# UDI

Unique Device Identification

## Why is UDI required?

**50,000** serious adverse events related to medical devices are estimated by the FDA to be reported each year

**3,000** deaths are estimated to result

Medical device recalls have **doubled** in the last decade.



## What is a UDI?

A unique numeric or alphanumeric code that includes:

**01**

A **device identifier (DI)**, which is specific to a device model

**02**

A **production identifier (PI)**, which includes the current production information for that specific device, such as lot or batch number, serial number, expiration date or a combination.

## The FDA's 5 Main Requirements



Assign a **globally unique, standardized identifier** to devices.

Directly **mark the UDI on the device itself** if the device is intended to be reused and reprocessed.

**01**

The label of **every medical device must have a UDI**.

**02**

**03**

The UDI must appear **on the label in a human readable format**, plus in a format that can be **read by automatic identification and data capture (AIDC) technology**.

**04**

**05**

Provide identifying information to FDA's **GUDID database** for others to access and use.

## Where do we get the UDI number?

Three Issuing Agencies (IA) currently accredited by the FDA assign the Device Identifier portion of the UDI.



## What **date convention** should we use?

The UDI rule requires the ISO standard "YYYY-MM-DD" date format on the label.

## What are the **penalties for noncompliance**?

Manufacturers will **not be able to sell their product in the US** if it is not labeled and uploaded to the FDA's GUDID. Potential enforcement actions include **seizure, injunction, civil and criminal penalties**.



## Compliance Dates for UDI Requirements

Each of the items below are required to bear a UDI and the appropriate data must be submitted to the GUDID database.

### By September 24:

**2015**

**2016**

**2018**

**2020**

### Classification:

Labels and packages of **implantable, life-supporting, and life-sustaining devices**

Class III devices\* required to be labeled with a UDI must bear a UDI as a permanent marking on the device itself. Labels and packages of class II medical devices

Class II devices\* required to be labeled with a UDI must bear a UDI as a permanent marking on the device itself.

Labels and packages of class I medical devices and devices not classified into class I, class II, or class III

Class I devices\*, and devices\* not classified into class I, class II, or class III, must bear UDI as a permanent marking on the device itself.

\* If intended to be used more than once and to be reprocessed before each use

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### Sources

<http://www.fda.gov/MedicalDevices/DeviceRegulationandGuidance/UniqueDeviceIdentification/CompliancedatesforUDIRrequirements/default.htm>

[http://duvalfdalaw.com/docs/udi\\_white\\_paper.pdf](http://duvalfdalaw.com/docs/udi_white_paper.pdf)

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