

De Novo Summary Usage Checklist

- Confirm that the FDA product code aligns with your device type
- Verify that the intended use and indications for use are comparable
- Review the device classification assigned under the De Novo pathway
- Compare technological characteristics with your device design
- Identify all applicable general controls
- Review each special control listed in the decision summary
- Assess how special controls impact design, testing, and labeling
- Review required non-clinical bench performance testing expectations
- Check whether clinical data was required or waived
- Review risk mitigations expected by the FDA and evaluate their applicability to your device
- Review software, cybersecurity, or usability controls, if applicable
- Review biocompatibility and materials considerations
- Evaluate labeling, instructions for use, and warning requirements
- Plan additional testing or justification to address gaps if there are technological differences with respect to your device
- Document how the De Novo summary supports your regulatory rationale