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| <br>Document                                                                   |        | Title: IMDRF SaMD N23, ISO 13485, US FDA QMS Map |              |
|                                                                                                                                                                 |        | Authors: Shweta Data, Sheila Ramerman            |              |
|                                                                                                                                                                 |        | Approved: /s/ Jacob Nardone, 2025-05-11          |              |
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## Purpose

This reference document maps the requirements of the IMDRF SaMD Working Group's Final Document N23, *Software as a Medical Device (SaMD): Application of Quality Management System*, to the requirements of ISO 13485:2016, *Medical devices - Quality management systems - Requirements for regulatory purposes*, to the QMS/compliance requirements of US FDA cited below.

## References

- IMDRF SaMD WG/N23 FINAL: 2015, <http://www.imdrf.org/docs/imdrf/final/technical/imdrf-tech-151002-samd-qms.pdf>
- [ISO 13485:2016](#), Medical devices - Quality management systems - Requirements for regulatory purposes
- [21 CFR 820](#), Quality System Regulations
- [21 CFR 801](#), Labeling
- [21 CFR 803](#), Medical Device Reporting
- [21 CFR 806](#), Reports of Corrections and Removals
- [21 CFR 807](#), Establishment Registration and Device Listing (includes 510(k) and PMA requirements)
- [21 CFR 7, Enforcement Policy](#) (recall authority)
- [21 CFR 830](#), UDI

**Note:** EU MDR quality system references are not included in this version. Those requirements and procedures will be added as part of Tidepool's EU MDR project.

## Responsibility

Regulatory/Quality are responsible for creating and maintaining this QMS matrix.

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| IMDRF N23 (QMS) Topic                                         |                              | ISO 13485:2016 Clauses                                                                    | US FDA 21 CFR                           | Tidepool SOPs/DOC                                                                                                                               | Comments |
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| <b>5.0--SaMD QUALITY MANAGEMENT PRINCIPLES</b>                | Quality management strategy  | 4 Quality Management System<br>4.1 General Requirements<br>4.2 Documentation Requirements | 820.5 Quality System                    | <a href="#">DOC-0003 Tidepool Quality Manual</a> Section 4, Quality Management System<br><a href="#">DOC-9001 Tidepool Quality System</a> Index |          |
|                                                               | Management responsibility    | 5.0 Management Responsibility                                                             | 820.20 Management Responsibility        | <a href="#">SOP-0020</a> Management Review                                                                                                      |          |
| <b>6.0--SaMD LEADERSHIP AND ORGANIZATIONAL SUPPORT</b>        |                              |                                                                                           |                                         |                                                                                                                                                 |          |
| <b>6.1--LEADERSHIP AND ACCOUNTABILITY IN THE ORGANIZATION</b> | Management Responsibility    | 5.0 Management Responsibility                                                             | 820.20(b) Organization                  | <a href="#">DOC-0003</a> , section 5, Management Responsibility                                                                                 |          |
|                                                               | Management Commitment        | 4.1 Management Responsibility                                                             |                                         |                                                                                                                                                 |          |
|                                                               | Customer focus               | 5.2 Customer Focus                                                                        | 820.20(a) Quality Policy                | <a href="#">DOC-0003</a> , section 5.9.3 , Quality Policy                                                                                       |          |
|                                                               | Quality Policy               | 5.3 Quality Policy                                                                        |                                         |                                                                                                                                                 |          |
|                                                               | Quality Planning             | 5.4 Quality Planning                                                                      | 820.20(d) Quality Planning              | <a href="#">DOC-0003</a> , section 5.11                                                                                                         |          |
|                                                               | Responsibility and Authority | 5.5 Responsibility, Authority & Communication                                             | 820.20(b)(1) Responsibility & Authority | <a href="#">DOC-0003</a> , section 5.4, 5.5, Management Responsibility                                                                          |          |
|                                                               | Management Representative    | 5.5.2 Management Representative                                                           | 820.20(b)(3) Management Representative  | <a href="#">DOC-0003</a> , section 5.12                                                                                                         |          |
|                                                               | Internal Communication       | 5.5.3 Internal Communication                                                              |                                         | <a href="#">DOC-0003</a> , section 5.6, Management Responsibility<br><a href="#">TRN-0005 Quality System Communication</a>                      |          |
|                                                               | Management Review            | 5.6 Management Review                                                                     | 820.20(c) Management Review             | <a href="#">DOC-0003</a> , Section 6<br><a href="#">SOP-0020 Management Review</a>                                                              |          |

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| IMDRF N23 (QMS) Topic                              | ISO 13485:2016 Clauses | US FDA 21 CFR                                                                                                                   | Tidepool SOPs/DOC                           | Comments                                                                                                                                                                                                                                                                                                                                                          |
|----------------------------------------------------|------------------------|---------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                    | Internal Audit         | 8.2.4 Internal Quality Audits                                                                                                   | 820.22 Quality Audit                        | DOC-0003, section 10.5, Internal audits<br><a href="#">SOP-0021 Internal Quality Audit</a>                                                                                                                                                                                                                                                                        |
| <b>6.2--RESOURCE AND INFRASTRUCTURE MANAGEMENT</b> | Resource Management    | 6 Resource Management                                                                                                           | 820.25 Personnel                            | <a href="#">DOC-0003</a> , section 7, Resource Management<br><a href="#">SOP-0003 Employee Qualifications and Training</a>                                                                                                                                                                                                                                        |
| <b>6.2.1--PEOPLE</b>                               | Provision of Resources | 6.1 provision of resources<br>5.1e Management Commitment                                                                        | 820.20(b)(2) Resources                      | <a href="#">DOC-0003</a> , section 7.1, Resource Management<br>DOC-0003, Section 7.1, 7.2.3                                                                                                                                                                                                                                                                       |
|                                                    | Skill Management       | 6.1 Provision of Resources<br>6.2 Human Resources                                                                               | 820.25(a) General                           | <a href="#">DOC-0003</a> , section 7<br><a href="#">SOP-0003</a> Employee Qualification & Training;<br><a href="#">TRN-0100 Tidepool Training Matrix</a><br>Also: <a href="#">TRN-0002 Employee Security Practices</a><br><a href="#">TRN-0003 Tidepool HIPAA Privacy and Confidentiality Training</a><br><a href="#">TRN-0004 Tidepool HIPAA Policy Overview</a> |
| <b>6.2.2--INFRASTRUCTURE AND WORK ENVIRONMENT</b>  | Infrastructure         | 6.3 Infrastructure<br>7.5.1 Control of Production and Service Provision<br>7.5.6 Validation of Production and Service Provision | 820.70(f) Buildings,<br>820.70(g) Equipment | <a href="#">DOC-0003</a> , section 8.1, 8.2, Infrastructure and Work Environment<br><a href="#">DOC-0003</a> , section 9.15.4 (control of production & service, validation of processes)<br><a href="#">SOP-0034</a> Validation of Software Tools and Services                                                                                                    |

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| IMDRF N23 (QMS) Topic                                  |                                 | ISO 13485:2016 Clauses                                                      | US FDA 21 CFR                                                                     | Tidepool SOPs/DOC                                                                                                                                                                                                     | Comments |
|--------------------------------------------------------|---------------------------------|-----------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|
|                                                        | Work environment                | 6.4 Work Environment and Contamination Control                              | 820.70(c) Environmental Control                                                   | <a href="#">DOC-0003</a> , section 8.3, Infrastructure and Work Environment<br><a href="#">DOC-0003</a> , section 9.15.4 (Preservation of product)                                                                    |          |
| 7.0--MANAGING SaMD LIFECYCLE SUPPORT PROCESSES         |                                 |                                                                             |                                                                                   |                                                                                                                                                                                                                       |          |
| 7.1--PRODUCT PLANNING                                  | Quality Planning                | 5.4 Planning                                                                | 820.20(d) Quality Planning                                                        | <a href="#">DOC-0003</a> , section 5.11                                                                                                                                                                               |          |
|                                                        | Planning of product realization | 7.1 Planning of Product Realization                                         | 820.30(a) General (Design Controls),<br>820.70(a) Production and Process Controls | <a href="#">DOC-0003</a> , section 9, Product Realization<br><br><a href="#">SOP-0005 Design, Development and Release</a>                                                                                             |          |
|                                                        | Design planning                 | 7.3.1 General (Design & Development)<br>7.3.2 Design & Development Planning | 820.30(a) General,<br>820.30(b) Design and Development Planning                   | <a href="#">SOP-0005 Design, Development and Release</a> sections 6.1, 7.1                                                                                                                                            |          |
| 7.2--RISK MANAGEMENT: A PATIENT SAFETY FOCUSED PROCESS | Planning of product realization | 7.1 Planning of Product Realization                                         | 820.30(g) Design Validation                                                       | <a href="#">DOC-0003</a> , section 9.8<br><a href="#">SOP-0005 Design, Development and Release</a> , section 12<br><a href="#">SOP-0006 Risk Management</a><br><a href="#">SOP-0009 Cybersecurity Risk Assessment</a> |          |
| 7.3--DOCUMENT CONTROL AND RECORDS                      | Quality System records          | 4.2 Documentation Requirements<br>7.1 Planning of Product Realization       | 820.186 Quality System Records                                                    | <a href="#">DOC-0003</a><br>DHR: section 9.12<br>DMR/MDF: section 4.10<br><a href="#">SOP-0005 Design, Development and Release</a> , DHF, sections 7.6, 15<br><a href="#">SOP-0006 Risk Management</a>                |          |

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|--------------------------------------------------|--------------------------------------|-------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|
|                                                  |                                      |                                     | <a href="#">SOP-0009 Cybersecurity Risk Assessment</a>                                                                                                                       |          |
|                                                  | Documentation Requirements – General | 820.20(e) Quality System Procedures | <a href="#">DOC-0003</a> , section 4.9;<br><a href="#">DOC-9001 Tidepool Quality System</a> Index<br><a href="#">SOP-0001</a> , sections 4, 5                                |          |
|                                                  | Quality Manual                       |                                     | <a href="#">DOC-0003 Tidepool Quality Manual</a>                                                                                                                             |          |
|                                                  | Document Control                     | 820.40 Document Controls            | <a href="#">DOC-0003</a> , sections 4.9, 4.10<br><a href="#">SOP-0001 Control of Documents</a><br><a href="#">2020-01-17 Tidepool FDA Electronic Signature Certification</a> |          |
|                                                  | Control of Records                   | 820.180 Records                     | <a href="#">DOC-0003</a> , sections 4.9, 4.10, 4.11<br><a href="#">SOP-0002 Control of Quality Records</a>                                                                   |          |
|                                                  | Device Master Records (DMR)          | 820.181 Device Master Record        | <a href="#">DOC-0003</a> , DMR/MDF: section 4.10                                                                                                                             |          |
| <b>7.4--CONFIGURATION MANAGEMENT AND CONTROL</b> | Document Control                     | 820.40 Document Controls            | <a href="#">SOP-0001</a><br><a href="#">SOP-0005</a> section 7.3 (for SW product configuration management)                                                                   |          |
|                                                  | Control of Records                   | 820.180 Records                     | <a href="#">SOP-0002</a> Control of Quality Records<br><br>SOPs include a Documentation section that states how and where                                                    |          |

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| IMDRF N23 (QMS) Topic                                                           | ISO 13485:2016 Clauses                                  | US FDA 21 CFR                                                                                                                   | Tidepool SOPs/DOC                                                                                                               | Comments                                                                                                                                                                                                                                                                    |  |
|---------------------------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
|                                                                                 |                                                         |                                                                                                                                 | applicable documents and records are controlled                                                                                 |                                                                                                                                                                                                                                                                             |  |
|                                                                                 | Control of design and development changes               | 7.3.9 Control of Design and Development Changes<br>7.3.8 Design & Development Transfer<br>7.3.7 Design & Development Validation | 820.30(i) Design Changes                                                                                                        | <a href="#">DOC-0003</a> , section 9.10;<br><a href="#">SOP-0005</a> , section 14 (design changes)<br><a href="#">SOP-0005</a> , section 13 (design transfer)<br><a href="#">SOP-0005</a> , section 12 (design validation)<br><a href="#">SOP-0026 Regulatory Reporting</a> |  |
|                                                                                 | Production and service provision – General Requirements | 7.5.1 Control of Production and Service Provision                                                                               | 820.70(a) Production and Process Controls, 820.70(g) Equipment, 820.70(h) Manufacturing Material, 820.70(i) Automated Processes | <a href="#">DOC-0003</a> , section 9.15 (process controls, automated processes, IMTE)<br>Manufacturing material N/A)                                                                                                                                                        |  |
|                                                                                 | Identification                                          | 7.5.8 Identification<br>7.5.3 Installation Activities                                                                           | 820.60 Identification                                                                                                           | <a href="#">DOC-0003</a> , section 9.15.4                                                                                                                                                                                                                                   |  |
|                                                                                 | Traceability                                            | 7.5.9 Traceability                                                                                                              | 820.65 Traceability                                                                                                             | <a href="#">DOC-0003</a> , section 9.15.4                                                                                                                                                                                                                                   |  |
|                                                                                 | Status Identification                                   | 7.5.8 Identification<br>7.5.3 Installation Activities                                                                           | 820.86 Acceptance Status                                                                                                        | <a href="#">DOC-0003</a> , section 9.15.5                                                                                                                                                                                                                                   |  |
| 7.5--MEASUREMENT, ANALYSIS AND IMPROVEMENT OF PROCESSES, ACTIVITIES AND PRODUCT | Measurement, analysis, and requirement                  | 8 Measurement, Analysis & improvement                                                                                           |                                                                                                                                 | <a href="#">DOC-0003</a> , section 10                                                                                                                                                                                                                                       |  |
|                                                                                 | Conformity assurance                                    | 8.1 General                                                                                                                     | 820.80 Receiving, in-process- and finished device acceptance                                                                    | <a href="#">DOC-0003</a> , 9.15.5                                                                                                                                                                                                                                           |  |
|                                                                                 | Feedback/Complaints                                     | 7.2.3 Communication<br>8.2.1 Feedback<br>8.2.2 Complaints Handling                                                              | 820.198 Complaint Files,<br>810 Mandatory Device Recalls,                                                                       | <a href="#">SOP-0007 Complaint Handling</a><br><a href="#">SOP-0010 User Experience Assessment</a>                                                                                                                                                                          |  |

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|                       | 8.2.3 Reporting to Regulatory Authorities   | 806 Corrections and Removals,<br>7 Voluntary Recalls                      | <a href="#">SOP-0011 Partner Complaint Sharing</a><br><a href="#">SOP-0013 Conducting a Recall</a><br><a href="#">SOP-0012 Field Safety Corrective Actions</a><br><a href="#">SOP-0026</a> , Regulatory Reporting<br><a href="#">SOP-0024 Customer Feedback</a> |          |
| Internal Audits       | 8.2.4 Internal Quality Audits               | 820.22 Quality Audit                                                      | <a href="#">DOC-0003</a> , section 10.5<br><a href="#">SOP-0021</a> Internal Quality Audit                                                                                                                                                                      |          |
| Process monitoring    | 8.2.5 Monitoring and measurement of process | 820.70(a) Production and Process Controls                                 | <a href="#">DOC-0003</a> , section 9.13 - 9.15<br><a href="#">SOP-0004 Corrective and Preventive Action</a><br><a href="#">SOP-0020 Management Review</a>                                                                                                       |          |
| Product monitoring    | 8.2.6 Monitoring and measurement of product | 820.80(a) Receiving, In-process, and Finished Device Acceptance – General | <a href="#">DOC-0003</a> , sections 9.15, 10.6<br><a href="#">SOP-0020 Management Review</a> ,                                                                                                                                                                  |          |
| Nonconforming product | 8.3 Control of Nonconforming Product        | 820.90(a) Non-Conforming Product                                          | <a href="#">DOC-0003</a> , section 10.8;<br><a href="#">SOP-0036</a> Handling Nonconformances                                                                                                                                                                   |          |
| Data analysis         | 8.4 Analysis of Data                        |                                                                           | <a href="#">DOC-0003</a> , section 10.7;<br><a href="#">SOP-0020</a> Management Review<br><a href="#">SOP-0035, Analysis of Data</a>                                                                                                                            |          |

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|                                                                    |                                                          |                                                                                          | <a href="#">TMP-0010 Management Review Meeting Template</a>                                                                                                                                                                       |          |
|                                                                    | Improvement                                              | 8.5 Improvement                                                                          | <a href="#">DOC-0003</a> , section 10                                                                                                                                                                                             |          |
|                                                                    | Improvement- general                                     | 8.5.1                                                                                    | 803 Medical Device Reporting<br><a href="#">DOC-0003</a> , section 10.4.3 (complaints);<br><a href="#">SOP-0008 Reportable Events</a>                                                                                             |          |
|                                                                    | Corrective action                                        | 8.5.2 Corrective Action                                                                  | 820.100 Corrective and Preventative Action<br><a href="#">DOC-0003</a> , section 10.6, 10.7, 10.8<br><a href="#">SOP-0004</a> Corrective & Preventive Action                                                                      |          |
|                                                                    | Prevention action                                        | 8.5.3 Preventive Action                                                                  |                                                                                                                                                                                                                                   |          |
|                                                                    | Customer communication                                   | 7.2.3 Communication                                                                      | 820.198 Complaint Files<br><a href="#">SOP-0007</a> , Complaint Handling;<br><a href="#">SOP-0011</a> Partner Complaint Sharing<br><a href="#">SOP-0024 Customer Feedback</a><br><a href="#">SOP-0030</a> Customer Communications |          |
|                                                                    | Control of design and development changes                | 7.3.9 Control of Design and development Changes                                          | 820.70b Product and Process Changes,<br>820.30(i) Design Changes<br><a href="#">DOC-0003</a> , section 4.2, 5.11, 6.2, 6.4, 9.8<br><a href="#">SOP-0005</a> , section 14;                                                         |          |
|                                                                    | Production and service provisions - General requirements | 7.5.1 Control of production and service provision<br>7.3.10 Design and Development Files | 820.184 Design History File<br><a href="#">SOP-0005</a> , section 15 (DHF/DDF)                                                                                                                                                    |          |
| <b>7.6--MANAGING OUTSOURCED PROCESSES, ACTIVITIES AND PRODUCTS</b> | Purchasing process                                       | 7.4.1 Purchasing Process                                                                 | 820.50 Purchasing Controls<br><a href="#">SOP-0023 Purchasing Process</a>                                                                                                                                                         |          |
|                                                                    | Vendor evaluation                                        | 7.4.1                                                                                    | 820.50(a) Evaluation of Suppliers, Contractors, and Consultants<br><a href="#">SOP-0022 Vendor Management</a>                                                                                                                     |          |



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|                                         | Purchasing information               | 7.4.2 Purchasing Information                                                      | 820.50(b) Purchasing Data                                    | <a href="#">SOP-0023</a> Purchasing Process                                                                                                                                                                                 |          |
|                                         | Verification of purchased product    | 7.4.3 Verification of <i>purchased product</i>                                    | 820.80 Receiving, in-process, and finished device acceptance | <a href="#">DOC-0003</a> , section 9.15<br><a href="#">SOP-0023</a> , section 4.5<br><a href="#">SOP-0034 Validation of Software Tools and Services</a>                                                                     |          |
|                                         | Improvement - general                | 8.5.1 General (Improvement)                                                       | 803 Post Market Surveillance                                 | <a href="#">DOC-0003</a> , section, section 10.10<br><a href="#">SOP-0027 Postmarket Surveillance</a>                                                                                                                       |          |
| 8.0--SaMD REALIZATION AND USE PROCESSES |                                      |                                                                                   |                                                              |                                                                                                                                                                                                                             |          |
| 8.1--REQUIREMENTS MANAGEMENT            | Customer requirements capture        | 7.2.1 Determination of requirements related to product (Customer-related process) | 820.30(c) Design Input                                       | <a href="#">DOC-0003</a> , section 9.2 (customer requirements), 9.5<br><a href="#">SOP-0005</a> , section 8 (sources of design inputs)                                                                                      |          |
|                                         | Contract review                      | 7.2.2 Review of requirements related to products                                  |                                                              | <a href="#">SOP-0030. Customer Communications</a> , section 5.1                                                                                                                                                             |          |
|                                         | Customer communication               | 7.2.3 Communication                                                               |                                                              | <a href="#">SOP-0030 Customer Communications</a>                                                                                                                                                                            |          |
|                                         | Quality System record                | 4.2 Documentation Requirements<br>7.1 Planning of Product Realization             | 820.186 Quality System Record                                | <a href="#">DOC-0003</a> , section 4.11<br><a href="#">SOP-0002. Control of Quality Records</a><br><a href="#">SOP-0005</a> , section 5.3 (backups). Also, each design control activity includes documentation requirements |          |
|                                         | Documentation Requirements - General | 4.2.1 General (Document Requirements)                                             | 820.20(e) Quality System Procedures                          | <a href="#">DOC-0003</a> , section 4.9<br><a href="#">SOP-0001</a> Control of Documents                                                                                                                                     |          |

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|                                            |                            |                                                                              | <a href="#">SOP-0002</a> Control of Quality Records          |                                                                                                                                                                                                                                                        |
|                                            | Quality Manual             | 4.2.2 Quality Manual                                                         | <a href="#">DOC-0003</a>                                     |                                                                                                                                                                                                                                                        |
|                                            | Doc Control                | 4.2.4 Control of Documents                                                   | 820.40 Document Controls                                     | <a href="#">DOC-0003</a> , section 4.9<br><a href="#">SOP-0001</a> Control of Documents<br><a href="#">SOP-0005</a> , sections 6.1, 7.1 (Jira project management & tickets)                                                                            |
|                                            | Control of Records         | 4.2.5 Control of Records<br>4.2 Documentation Requirements.                  | 820.180 Records                                              | <a href="#">DOC-0003</a> , section 4.9<br><a href="#">SOP-0001</a> , Control of Documents<br><a href="#">SOP-0002</a> Control of Quality Records                                                                                                       |
|                                            | Requirements Records       | 7.1d Planning of Product Realization                                         | 820.80 Receiving, In-process, and Finished Device Acceptance | <a href="#">DOC-0003</a> , section 9.13 (purchasing controls), 9.14 (purchasing information), 9.15 (verification of purchased product)<br><a href="#">SOP-0023</a> , section 4.5<br><a href="#">SOP-0034 Validation of Software Tools and Services</a> |
| <b>8.2--DESIGN +<br/>8.3-- DEVELOPMENT</b> | Design & Development (D&D) | 7.1 Planning of Product Realization<br>7.3.2 Design and Development Planning | 820.30(b) Design and Development Planning                    | <a href="#">DOC-0003</a> , section 9.4<br><a href="#">SOP-0005</a> , sections 6.1, 7.1<br><a href="#">SOP-0006. Risk Management</a><br><a href="#">SOP-0009. Cybersecurity Risk Management</a>                                                         |
|                                            | Design inputs              | 7.2.1 Customer Related Processes<br>7.2.2 Review of Requirements Related to  | 820.30(c) Design Input                                       | <a href="#">DOC-0003</a> , section 9.2 (customer requirements), 9.5<br><a href="#">SOP-0005</a> , section 8                                                                                                                                            |

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|                                         | Product<br>7.3.3 Design and Development Inputs                                                             |                                                           | (design inputs)                                                                                                                                                                                |          |
|                                         | D&D Outputs (including DHF)<br>7.3.4 Design and Development Outputs<br>7.3.10 Design and Development Files | 820.30(d) Design Output,<br>820.30(j) Design History File | <a href="#">DOC-0003</a> , section 9.6<br><a href="#">SOP-0005</a> , section 9 (design outputs)<br><a href="#">SOP-0005</a> , section 15 (DHF/DDF)                                             |          |
|                                         | Design review<br>7.3.5 Design and Development Review                                                       | 820.30(e) Design Review                                   | <a href="#">DOC-0003</a> , section 9.9<br><a href="#">SOP-0005</a> section 10                                                                                                                  |          |
|                                         | Design Transfer<br>7.3.8 Design and Development Transfer                                                   | 820.30(h) Design Transfer                                 | <a href="#">DOC-0003</a> , section 9.11<br><a href="#">SOP-0005</a> , section 13                                                                                                               |          |
|                                         | Control of D&D changes<br>7.3.9 Control of Design and Development Changes                                  | 820.30(i) Design Changes                                  | <a href="#">DOC-0003</a> , section 9.10<br><a href="#">SOP-0005</a> , section 14                                                                                                               |          |
| <b>8.4--VERIFICATION AND VALIDATION</b> | Design verification<br>7.3.6 Design and Development Verification                                           | 820.30(f) Design Verification                             | <a href="#">DOC-0003</a> , section 9.7<br><a href="#">SOP-0005</a> , section 11<br><a href="#">SOP-0006</a> , section 5.3.1 (throughout product realization), 12.3 (risk control verification) |          |
|                                         | Design validation<br>7.3.7 Design and Development Validation                                               | 820.30(g) Design Validation                               | <a href="#">DOC-0003</a> , section 9.8<br><a href="#">SOP-0005</a> , section 12                                                                                                                |          |
|                                         | Verification of purchased product<br>7.4.3 Verification of Purchased Product                               | 820.80(b) Receiving Acceptance                            | <a href="#">DOC-0003</a> , section 9.15<br><a href="#">SOP-0023</a> , section 4.5                                                                                                              |          |
| <b>8.5—DEPLOYMENT</b>                   | Customer Communication<br>7.2.3 Communication (Customer related process)                                   |                                                           | <a href="#">DOC-0003</a> , section 9.3<br><a href="#">SOP-0030</a> Customer Communication<br><a href="#">SOP-0005</a> , section 13.4.4, 13.4.5 (release notes, app store)                      |          |
|                                         | Production & service provision<br>7.5 Production and Service provision                                     |                                                           | <a href="#">DOC-0003</a> , section 9.15.4                                                                                                                                                      |          |

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|                       |                                                                                                                            |                                 | <a href="#">SOP-0005</a> , sections 13.1 - 13.3 (transfer to production, product approval, deployment)<br><a href="#">SOP-0028</a> Labeling Control                                                                                                                               |          |
| Contamination Control | 6.4.2 Contamination Control                                                                                                | 820.70(e) Contamination Control | <a href="#">DOC-0003</a> , section 8.3<br><a href="#">SEC-0012 Information Security Policy</a><br><a href="#">SEC-0005, Access Control</a><br><a href="#">SEC-0006, Operations Security Policy</a>                                                                                |          |
| Installation          | 4.2.3 Medical Device File<br>7.5.3 Installation Activities<br>7.5.8 Identification<br>7.5.11 Preservation of Product       | 820.170 Installation            | <a href="#">DOC-0003</a> , section 4.10 (DMR, MDF); section 9.15.4 (installation, identification, preservation)<br><a href="#">SEC-0005, Access Control</a><br><a href="#">SEC-0006, Operations Security Policy</a>                                                               |          |
| Distribution          | 4.2.3 Medical Device File<br>7.1 Planning of Product Realization<br>7.5.8 Identification<br>7.5.11 Preservation of Product | 820.160 Distribution            | <a href="#">DOC-0003</a> , section 4.10 (DMR, MDF); 9.1 (planning); 9.15.4 (identification, preservation of product, distribution)<br><a href="#">SEC-0005, Access Control</a><br><a href="#">SEC-0006, Operations Security Policy</a><br><a href="#">SOP-0005</a> , section 13.3 |          |
| Servicing             | 4.2.3 Medical Device File<br>7.1 Planning of product Realization<br>7.5.4 Servicing Activities<br>7.5.8 Identification     | 820.200 Servicing               | N/A, see <a href="#">DOC-0003</a> , section 1.7                                                                                                                                                                                                                                   |          |

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|-------------------------|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>8.6--MAINTENANCE</b> | Customer Communication                                                                          | 7.2.3                                                                                                     | <a href="#">SOP-0030</a> , Customer Communication<br><a href="#">SOP-0026</a> , Regulatory Reporting<br><a href="#">SOP-0005</a> , section 14 (design changes); section 7.3 (versioning w/respect to changes); section 13.4.4, 13.4.5 (release notes, app store)                                                                                                                      |                                                                                                                                                                       |
|                         | Production & Service provision                                                                  | 820.30, Design Changes                                                                                    | <a href="#">DOC-0003</a> , section 9.10<br><a href="#">SOP-0005</a> , section 14                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                       |
|                         | Servicing                                                                                       | 7.5.1.2.3                                                                                                 | 820.200                                                                                                                                                                                                                                                                                                                                                                               | N/A, see DOC-0003 section 1.7                                                                                                                                         |
|                         | Customer property (Confidential health information; partner-supplied components, software, etc) | 7.5.4                                                                                                     | <a href="#">DOC-0003</a> , section 9.15.4 (Customer Property)<br><a href="#">SEC-0004</a> , <a href="#">Data Management Policy</a><br><a href="#">TRN-0002</a> <a href="#">Employee Security Practices</a><br><a href="#">TRN-0003</a> <a href="#">Tidepool HIPAA Privacy and Confidentiality Training</a><br><a href="#">TRN-0004</a> <a href="#">Tidepool HIPAA Policy Overview</a> |                                                                                                                                                                       |
|                         | Monitoring & measuring Devices                                                                  | 7.6                                                                                                       | 820.72                                                                                                                                                                                                                                                                                                                                                                                | <a href="#">DOC-0003</a> , section 9.15.4                                                                                                                             |
|                         | Feedback/Complaints                                                                             | 7.2.3 Communication, 8.2.1 Feedback, 8.2.2 Complaints Handling, 8.2.3 Reporting to Regulatory Authorities | 820.198 Complaint Files, 822 Post-Market Surveillance, 810 Mandatory Device Recalls,                                                                                                                                                                                                                                                                                                  | <a href="#">DOC-0003</a> , sections 9.3 (customer communication), <a href="#">SOP-0007</a> Complaint Handling<br><a href="#">SOP-0011</a> , Partner Complaint Sharing |

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|--------------------------|---------------------------------------------------------|---------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|--|
|                          |                                                         | 806 Corrections and Removals,<br>7 Voluntary Recalls                            | <a href="#">SOP-0012</a> , Field Safety Corrective Actions<br><a href="#">SOP-0013</a> , Conducting a Recall<br><a href="#">SOP-0024</a> Customer Feedback<br><a href="#">SOP-0026</a> Regulatory Reporting<br><a href="#">SOP-0027</a> Postmarket Surveillance<br><a href="#">SOP-0030</a> Customer Communication |                                                                                                                                                       |  |
| 8.7--<br>DECOMMISSIONING | Control of records                                      | 4.2.5 Control of Records<br>4.2 Documentation Requirements.                     | 820.180 Records,<br>820.186                                                                                                                                                                                                                                                                                        | <a href="#">SOP-0002</a> Control of Quality Records<br><a href="#">SOP-0005</a> , section 5.3 (backup & recovery), section                            |  |
|                          | Documentation Requirements - General                    | 4.2.1 General (Documentation Requirements)                                      | 820.20(e) Quality System Procedures                                                                                                                                                                                                                                                                                | <a href="#">DOC-0003</a> section 4.9<br><a href="#">SOP-0001</a> Control of Documents                                                                 |  |
|                          | Quality Manual                                          | 4.2.2 Quality Manual                                                            |                                                                                                                                                                                                                                                                                                                    | <a href="#">DOC-0003</a> Quality Manual                                                                                                               |  |
|                          | Document Control                                        | 4.2.4 Control of Documents                                                      | 820.40 Document Controls                                                                                                                                                                                                                                                                                           | <a href="#">DOC-0003</a> section 4.9<br><a href="#">SOP-0001</a> Control of Documents                                                                 |  |
|                          | Production and service provision – General requirements | 7.5.1 Control of production and service provisions<br>4.2.3 Medical Device File | 820.181 Device Master Record                                                                                                                                                                                                                                                                                       | <a href="#">DOC-0003</a> , section 4.10 (DMR, MDF)                                                                                                    |  |
|                          | Product realization                                     | 7 Product Realization                                                           | 820.140 Handling<br>820.150 Storage<br>820.160 Distribution<br>820.180 Records<br>820.184 Device History Records                                                                                                                                                                                                   | <a href="#">DOC-0003</a> , section 9.15.4 (DHR; Installation, Distribution; Preservation of product)<br><a href="#">SOP-0002</a> , Control of Records |  |

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|-------------------------------------------------|------------------------|----------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
|                                                 |                        | 820.186 Quality System Records<br>820.200 Servicing                                                                        | SOP-0005 (Handling, Storage);, section 7.3 (versioning); 7.5.2 (github repositories & tags); 13 (released version)<br>Servicing N/A; See DOC-0003 section 1.7 (Servicing is N/A) |                                                                                                                                                                                                                                                   |  |
| ADDITIONAL CLAUSES NOT INCLUDED DIRECTLY IN N23 | Process Validation     | 7.5.6 Validation of process for production and service provision                                                           | 820.75 Process Validation                                                                                                                                                        | DOC-0003, section 9.15.4                                                                                                                                                                                                                          |  |
|                                                 | Traceability Documents | 7.5.9 Traceability                                                                                                         | 820.65 Traceability                                                                                                                                                              | DOC-0003, 9.15.4                                                                                                                                                                                                                                  |  |
|                                                 | Status Identification  | 7.5.8 Identification                                                                                                       | 820.60 Identification                                                                                                                                                            | DOC-0003, 9.15.4                                                                                                                                                                                                                                  |  |
|                                                 | Device Packaging       | 4.2.3 Medical Device File<br>7.5.8 Identification<br>7.5.11 Preservation of Product                                        | 820.130 Device Packaging                                                                                                                                                         | N/A, see DOC-0003 section 1.7                                                                                                                                                                                                                     |  |
|                                                 | Handling               | 4.2.3 Medical Device File<br>7.1 Planning of Product Realization<br>7.5.8 Identification<br>7.5.11 Preservation of Product | 820.140 Handling                                                                                                                                                                 | DOC-0003, section 4.10 (MDF); 9.1 (planning); 9.15.4 (identification, preservation)<br>SOP-0005, “unique URL” references throughout; (github repositories & tags); section 13.1 (transfer to production); section 13.3 (deployment to production) |  |
|                                                 | Storage                | 4.2.3 Medical Device File<br>7.1 Planning of Product Realization<br>7.5.8 Identification<br>7.5.11 Preservation of Product | 820.150 Storage                                                                                                                                                                  | DOC-0003, section 4.10 (MDF); 9.15.4 (software repositories, identification, preservation)<br>SOP-0005, section 7.5, (github repositories & tags); 13.1 (transfer to                                                                              |  |

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|-------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|
|                                                 |                                                                                                                                           |                                                                    | production), 13.3<br>(deployment to production)                                                                                                                                                                                                            |          |
| Monitoring & Measurement                        | 8.2 Monitoring and Measurement                                                                                                            |                                                                    | <a href="#">DOC-0003</a> , section 10                                                                                                                                                                                                                      |          |
| Production Personnel                            | 6.2 Human Resources                                                                                                                       | 820.70(d) Personnel                                                | <a href="#">DOC-0003</a> , section 7.2<br>(Competency)                                                                                                                                                                                                     |          |
| Production and provision – General requirements | 7.5.1e Control of production and service provision<br>4.2.3 Medical Device File<br>7.5.8 Identification<br>7.5.11 Preservation of Product | 820.120 Device Labeling                                            | <a href="#">DOC-0003</a> , section 9.15.4<br>(labeling, identification, preservation)); section 4.10 (MDF)<br><a href="#">SOP-0028 Labeling Control</a>                                                                                                    |          |
| Issue of implementation of Advisory notices     | 7.2.3 Communication<br>8.2.1 Feedback<br>8.2.2 Complaints Handling<br>8.2.3 Reporting to Regulatory Authorities                           | 806 Corrections and Removals                                       | <a href="#">SOP-0007</a> Complaint Handling<br><a href="#">SOP-0012</a> , Field Safety Corrective Actions<br><a href="#">SOP-0013</a> , Conducting a Recall<br><a href="#">SOP-0024</a> Customer Feedback<br><a href="#">SOP-0026</a> Regulatory Reporting |          |
| Medical Device Tracking                         | MDR clauses                                                                                                                               | 822 Medical Device Tracking Requirements                           | N/A to Tidepool's products                                                                                                                                                                                                                                 |          |
| Device Classification                           | MDR clauses                                                                                                                               | 860 Medical Device Classification Procedures                       | <a href="#">DOC-0003</a> , section 5.1<br>(meeting regulatory requirements)<br><a href="#">SOP-0033</a> Marketing Authorization                                                                                                                            |          |
| Labelling & UDI                                 | MDR clauses                                                                                                                               | 801 Labeling (801.20)<br>Label to bear a unique device identifier: | <a href="#">DOC-0003</a> , section 9.15.4<br>(Labeling/Instructions for use; Identification & Traceability)                                                                                                                                                |          |



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|                       |                        |               | <a href="#">SOP-0028</a> Control of Labeling, section 5.7 |          |