

DECLARATION OF BLOOD PRESSURE MEASURING DEVICE EQUIVALENCE 2006

A SIGNED COPY WILL BE POSTED ON THE www.dableducational.org WEBSITE

SECTION A - Please complete all items online.

I Tomohiro Kukita Director of Omron Healthcare Europe B.V.
Name of a Company Director Company name

hereby state that there are no differences that will affect blood pressure measuring accuracy between the

Omron BP760 (HEM-7220-Z)

Blood pressure measuring device for which validation is claimed

blood pressure measuring device and the

Omron M6 Comfort (HEM-7000-E)

Existing validated blood pressure measuring device

blood pressure measuring device, which has previously passed the International protocol, the results of which were published as follows

Belghazi J, El Feghali RN, Moussalem T, Rejdych M, Asmar RG

Authors(s)

Validation of four automatic devices for self-measurement of blood pressure according

to the International Protocol of the European Society of Hypertension

Title

Vascular Health and Risk Management

2007;3(4):389-400

Publication

Year Volume Pages

The only differences between the devices involve the following components:

(When a component is not relevant, both Yes and No should be left blank. Please provide details on any differences below.)

Part I	1	Algorithm for Oscillometric Measurements	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
	2	Algorithm for Auscultatory Measurements	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	3	Artefact/Error Detection	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
	4	Microphone(s)	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	5	Pressure Transducer	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
	6	Cuff or Bladder	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
	7	Inflation Mechanism	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
	8	Deflation Mechanism	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Part II	9	Model Name or Number	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
	10	Casing	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
	11	Display	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
	12	Carrying/Mounting Facilities	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	13	Software other than Algorithm	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
	14	Memory Capacity/Number of stored measurements	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
	15	Printing Facilities	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	16	Communication Facilities	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	17	Power Supply	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
	18	Other Facilities	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Brief explanation of differences and further relevant details:

5) The pressure sensor is replaced to a piezo electric sensor (NPS) from a capacitive sensor (CPSU), but the accuracy of blood pressure measurement is equivalent between NPS and CPSU.

10) The "Morning/Evening Average" switch and the "Memory" switch are added.

11) The symbol for cuff wrapping guide, the indicator for blood pressure level, the morning hypertension symbol, the morning average symbol, the evening average symbol and the week display are added.

13) The function to guide cuff wrapping, the function to detect morning hypertension and the function to calculate a weekly averages for measurements taken in the morning and evening are included.





14) Stores 60 readings each for one user instead of 90 readings for one user.



SECTION B - Complete all items, bar signatures and seal, online and print. Sign and seal it then send the original along with manuals for both devices to our address below.

Signature of Director	<u>Tomohiro Kukita</u>	Company Stamp/Seal
Name	<u>Tomohiro Kukita</u>	OMRON HEALTHCARE EUROPE B.V. Kruisweg 577 NL-2132 NA Hoofddorp P.O. Box 2150 NL- 2130 GL Hoofddorp Tel. +31 - 20 354 82 00 Fax +31 - 20 354 82 01
Date	<u>8th June 2011</u>	
Signature of Witness	<u>J. Meijer</u>	
Name	<u>J. MEIJER-DUL</u>	
Address	<u>Omron Healthcare Europe B.V., Kruisweg 577 , 2132NA Hoofddorp, The Netherlands</u>	

Comparison of the Omron BP760 (HEM-7220-Z) with the Omron M6 Comfort (HEM-7000-E)

Devices	Omron BP760 (HEM-7220-Z)	Omron M6 Comfort (HEM-7000-E)
Pictures		
Display		
Validation		ESH-IP 2002
Device 1 Criteria	<p>Buttons/Switches</p> <p><i>Analysis</i></p> <p>Morning/Evening Average 10</p> <p>Display/Symbols/Indicators</p> <p><i>Preparation</i></p> <p>Correct cuff wrapping indicator 11, 13, 18</p> <p><i>Post Measurement</i></p> <p>Morning hypertension (rising sun) 11, 13</p> <p>Daytime weekly average (sun) 11, 13</p> <p>Night-time weekly average (moon) 11, 13</p> <p>Week indicator 11, 13</p> <p>Algorithms</p> <p><i>Averages and Differences</i></p> <p>Daytime weekly average × 8 weeks 13</p> <p>Night weekly average × 8 weeks 13</p>	

Devices	Omron BP760 (HEM-7220-Z)	Omron M6 Comfort (HEM-7000-E)
Device 1 Criteria (continued)	Algorithms (continued) <i>Parameter Settings</i> Correct cuff wrapping detection 13	
Same Criteria	Measurement <i>Accuracy</i> BP accuracy ± 3 mmHg or $\pm 2\%$ ^{Query 1} 1, 5 Pulse accuracy $\pm 5\%$ 1, 5 <i>Method</i> Oscillometric measurement method 1, 5 Pulse 40 bpm – 180 bpm 1, 5, 8 Manually initiated measurements 13 Measurements are from single inflations 13 <i>Inflation</i> Inflation 0 mmHg – 299 mmHg 1, 5, 7 Automatic Inflation 7 Fuzzy Logic ^{Query 2} 7 Press button if BP > 220 mmHg 7 Manually adjustable inflation pressure 7 <i>Deflation</i> Automatic Deflation 8 Automatic safety release valve ^{Query 2} 8 <i>Cuffs</i> Single 152 mm x 600 mm (Arm circ. 22 to 42 cm) 6 Buttons/Switches <i>Power</i> On/Off with Start/Stop (Start/Stop Start Label) 10 <i>Settings</i> Date/Time set 10 Display/Symbols/Indicators <i>Measurement Procedure</i> Deflation symbol 11 During Measurement: BP Level & Heartbeat 11 <i>Post Measurement</i> SBP, DBP and Pulse 11 Average icon 11, 13, 14 Body movement error 3, 11, 13, 18	Measurement <i>Accuracy</i> BP accuracy ± 3 mmHg ^{Query 1} 1, 5 Pulse accuracy $\pm 5\%$ 1, 5 <i>Method</i> Oscillometric measurement method 1, 5 Pulse 40 bpm – 180 bpm 1, 5, 8 Manually initiated measurements 13 Measurements are from single inflations 13 <i>Inflation</i> Inflation 0 mmHg – 299 mmHg 1, 5, 7 Automatic Inflation 7 Fuzzy Logic ^{Query 2} 7 Press button if BP > 220 mmHg 7 Manually adjustable inflation pressure 7 <i>Deflation</i> Automatic Deflation 8 Automatic safety release valve ^{Query 2} 8 <i>Cuffs</i> Single 152 mm x 600 mm (Arm circ. 22 to 42 cm) 6 Buttons/Switches <i>Power</i> On/Off with Start/Stop (O/I Start Label) 10 <i>Settings</i> Date/Time set 10 Display/Symbols/Indicators <i>Measurement Procedure</i> Deflation symbol 11 During Measurement: BP Level & Heartbeat 11 <i>Post Measurement</i> SBP, DBP and Pulse 11 Average icon 11, 13, 14 Body movement error 3, 11, 13, 18

Devices	Omron BP760 (HEM-7220-Z)	Omron M6 Comfort (HEM-7000-E)
Same Criteria (continued)	<p>Display/Symbols/Indicators (continued)</p> <p><i>Post Measurement (continued)</i></p> <p>Irregular heartbeat 11, 13, 18</p> <p><i>Measurement Records</i></p> <p>Memory icon 11</p> <p>Memory recall number (Replaces pulse rate momentarily)^{Query 3} 11</p> <p><i>Date and Time</i></p> <p>Date and Time 11</p> <p>Date and Time (During memory recall) 11</p> <p><i>Power</i></p> <p>Low battery 11, 17</p> <p>Algorithms</p> <p><i>Averages and Differences</i></p> <p>Last 3 measurements (within 10 min of each other) mean 13</p> <p><i>Diagnostic</i></p> <p>Normotension/Hypertension 13</p> <p>135 / 85 mmHg thresholds 13</p> <p>Irregular heartbeat detection 13</p> <p>Body movement error detection 3, 13</p> <p>Case</p> <p><i>Display</i></p> <p>Single screen display 10</p> <p>Segment LCD 10</p> <p><i>Power</i></p> <p>4 “AA” batteries ~ 500 measurements 17</p> <p>AC adapter 17</p>	<p>Display/Symbols/Indicators (continued)</p> <p><i>Post Measurement (continued)</i></p> <p>Irregular heartbeat 11, 13, 18</p> <p><i>Measurement Records</i></p> <p>Memory icon 11</p> <p>Memory recall number (Replaces pulse rate momentarily)^{Query 3} 11</p> <p><i>Date and Time</i></p> <p>Date and Time 11</p> <p>Date and Time (During memory recall) 11</p> <p><i>Power</i></p> <p>Low battery 11, 17</p> <p>Algorithms</p> <p><i>Averages and Differences</i></p> <p>Last 3 measurements (within 10 min of each other) mean 13</p> <p><i>Diagnostic</i></p> <p>Normotension/Hypertension 13</p> <p>135 / 85 mmHg thresholds 13</p> <p>Irregular heartbeat detection 13</p> <p>Body movement error detection 3, 13</p> <p>Case</p> <p><i>Display</i></p> <p>Single screen display 10</p> <p>Segment LCD 10</p> <p><i>Power</i></p> <p>4 “AA” batteries ~ 1500 measurements 17</p> <p>AC adapter (Optional) 17</p>
Comparable Criteria	<p>Measurement</p> <p><i>Sensors</i></p> <p>Pressure sensor: piezo-resistive^{Note 1} 5</p> <p><i>Measurement Records</i></p> <p>Memory: 60 measurements 14</p> <p>Buttons/Switches</p> <p><i>Measurement Records</i></p> <p>Memory 10</p> <p><i>Settings</i></p> <p>Up and down 10</p>	<p>Measurement</p> <p><i>Sensors</i></p> <p>Pressure sensor: capacitive^{Note 1} 5</p> <p><i>Measurement Records</i></p> <p>Memory: 90 measurements 14</p> <p>Buttons/Switches</p> <p><i>Measurement Records</i></p> <p>Memory × 2 10</p>

Devices	Omron BP760 (HEM-7220-Z)	Omron M6 Comfort (HEM-7000-E)
Comparable Criteria (continued)	Display/Symbols/Indicators <i>Post Measurement</i> Measurement error E_1, E_2, E_3, E_4, E_5 and E_r <small>Query 2, Note 2</small> 11	Display/Symbols/Indicators <i>Post Measurement</i> Measurement error $EE/\square, E$ and E/E <small>Query 2, Note 2</small> 11
	Hypertension (Indicator strip) 11, 13	Hypertension (Blinking heartbeat) 11, 13
	Case <i>Power</i> Automatic switch-off when not used for 2 min 17	Case <i>Power</i> Automatic switch-off when not used for 5 min 17
Device 2 Criteria		

Queries													
1	Query	BP accuracy is claimed to be ± 3 mmHg for the M6 Comfort (HEM-7000-E) but ± 3 mmHg or $\pm 2\%$ for the BP760 (HEM-7220-Z). Can you clarify how these differ, both for pressures above and below 150 mmHg (where the 2% error equals 3 mmHg)?											
	Response	<i>BP760 has same BP accuracy as M6 Comfort (± 3 mmHg). The description “± 3mmHg or 2% of reading” comes from the requirement of AAMI SP-10:2008 which is one of the standard for medical device in US. (BP760 is available in US market.) Please find the excerpt from the standard as following.</i> 4.4.4.B Pressure transducer accuracy At any single condition within the ambient temperature range of 50 °F to 104 °F (10 °C to 40 °C) and the relative humidity range of 15 % to 90 % (non-condensing), both for increasing and for decreasing pressure, the maximum error for the measurement of the cuff pressure at any point of the scale range shall be ± 3 mmHg (± 0.4 kPa) or 2 % of the reading above 200 mmHg.											
	Comment	The explanation is accepted											
2	Query	There are differences in the descriptions of the rapid air release, fuzzy logic and error codes between the manuals. Similar queries were raised previously but it is not possible to infer scientifically that answers can be applied in these instances also. Can you confirm that the rapid air release and fuzzy logic are used in both devices and that the mapping of the errors, as described previously for specific devices also applies to these?											
		<table border="1"> <thead> <tr> <th></th> <th>Rapid Air Release</th> <th>Fuzzy Logic</th> <th>Error Codes²</th> </tr> </thead> <tbody> <tr> <td>BP760 (HEM-7220-Z)</td> <td>Yes</td> <td>No</td> <td>E1 E4 E5 E2 E3 Er</td> </tr> <tr> <td>M6 Comfort (HEM-7000-E)</td> <td>No</td> <td>Yes</td> <td>E EE/P E/E</td> </tr> </tbody> </table> <p>Note 1 This is not included in the manual but stated in a previous communication. Note 2 From previous communications, the errors are equivalent and grouped as shown and <i>P</i> refers to a pressure level.</p>		Rapid Air Release	Fuzzy Logic	Error Codes ²	BP760 (HEM-7220-Z)	Yes	No	E1 E4 E5 E2 E3 Er	M6 Comfort (HEM-7000-E)	No	Yes
	Rapid Air Release	Fuzzy Logic	Error Codes ²										
BP760 (HEM-7220-Z)	Yes	No	E1 E4 E5 E2 E3 Er										
M6 Comfort (HEM-7000-E)	No	Yes	E EE/P E/E										
	Response	<i>We confirm that rapid air release function and fuzzy logic are applied for all devices. Regarding to the error codes, please refer the document which we sent previously.</i>											

	<p>Comment The explanation is accepted</p>																				
3	<p>Query On the respective diagrams for the unit display, the pulse display is also indicated as having a memory number function. This, latter function is not described elsewhere in the manuals. Is this an error in the description or, as described for other devices, does the memory number flash briefly when displaying previous measurements.</p> <p>Response <i>As described for other devices, the memory number flash briefly when displaying previous measurements. For BP785, memory number is shown before the average is displayed. Memory number is not shown when the values for the individual measurement is displayed.</i></p> <p>Comment The explanation is accepted</p>																				
Notes	<p>1 The sensors used in the Omron M6 Comfort (HEM-7000-E) is known as the “current pressure sensor” (CPSU), a capacitive type, which is being replaced by as new pressure sensor (NPS), a piezoelectric semiconductor type. This is used in the Omron BP760 (HEM-7220-Z).</p> <p>Details of comparatives tests between the sensors have been reviewed by dabl®Educational. Furthermore, the Omron M6 Comfort (HEM-7221-E8), which is the same as the Omron M6 Comfort (HEM-7221-E) except for a similar change in sensor, has been validated using the ESH-IP 2010 protocol and is recommended for use. Following a review of these documents, it was concluded that the change in sensor would not have a detrimental effect on the accuracy of the device.</p>																				
	<p>2 This note from the equivalence application for the HEM-7221-E is also relevant to the HEM-7220-Z.</p> <p><i>Regarding to Group 4, M6 Comfort (7000) error code E had subdivide to M6 Comfort (7221) error code E1, E4 and E5. EE/0 is as same as E2. E/E is as same as E3. The background is explained below. For M6 Comfort (7000), EE/0 is as same as EE, 0 means OmmHg, and this has the error code Er, but not described in manual. We consider there is no change in the error codes and algorithms among these devices.</i></p> <p><i>For our software, error codes consist of several error judgment conditions. We had a limitation to show enough information on the display in the past due to technical restriction on hardware. For now, the hardware performance has advanced to display more error code. Therefore, we reconsidered the constitution of the error judgment conditions and changed the expression to make it more easy to understand for users, starting from M6 (HEM-7211-E) and M6 Comfort (HEM-7221-E).</i></p> <p style="text-align: center;">Group 4 Error Codes</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: center;">Model</th> <th colspan="6" style="text-align: center;">Error codes</th> </tr> </thead> <tbody> <tr> <td>M6 Comfort (7000)</td> <td>EE/0</td> <td>E</td> <td>E/E</td> <td></td> <td></td> <td></td> </tr> <tr> <td>M6 Comfort (7221)</td> <td>E1</td> <td>E2</td> <td>E3</td> <td>E2</td> <td>E5</td> <td>Er</td> </tr> </tbody> </table>	Model	Error codes						M6 Comfort (7000)	EE/0	E	E/E				M6 Comfort (7221)	E1	E2	E3	E2	E5
Model	Error codes																				
M6 Comfort (7000)	EE/0	E	E/E																		
M6 Comfort (7221)	E1	E2	E3	E2	E5	Er															

Recommendation	Equivalence is recommended.
Date	02/07/2012