

DECLARATION OF BLOOD PRESSURE MEASURING DEVICE EQUIVALENCE 2006

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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 M6 (HEM-7211-E8)

Blood pressure measuring device for which validation is claimed

blood pressure measuring device and the

Omron 705IT (HEM-759-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

El Assaad, Mohamed A.; Topouchian, Jirar A.; Asmar, Roland G

Authors(s)

Evaluation of two devices for self-measurement of blood pressure according to the

international protocol: the Omron M5-I and the Omron 705IT

Title

Blood pressure monitoring

Publication

2003;8(3):127-133

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 checked="" type="checkbox"/>	No <input 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 checked="" type="checkbox"/>	No <input type="checkbox"/>
	16	Communication Facilities	Yes <input checked="" 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.

6) Outer cloth is changed, no change on the size, shape and material on bladder.

10) No power button (the start button is used for power on and measurement start.). No adjust button. The up button and down button are added. No USB port.

11) No symbol for inflation. The symbol for average value, the symbol for irregular heart beat, the symbol for body motion, the symbol for cuff wrapping guide and the indicator for blood pressure level are added.

The dual check system indicator (LED) is added.





- 13) The function to detect irregular heart beat, the function to detect body motion, the function to average of memories (average of the latest 3 measurements), the function to guide cuff wrapping and the function to check the pressure sensor (“the dual check system”) are included.
- 14) Stores 90 readings instead of 28.
- 15) No Printing Facilities.
- 16) No communication facilities.



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.
Date	<u>29 June 2011</u>	Kruisweg 577
Signature of Witness	<u>J. Meijer</u>	NL-2132 NA Hoofddorp
Name	<u>Janet Meijer</u>	P.O. Box 2150 NL- 2130 GL Hoofddorp
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		Fax +31 - 20 354 82 01

Comparison of the Omron M6 (HEM-7211-E8) with the Omron 705IT (HEM-759-E)

Devices	Omron M6 (HEM-7211-E8)	Omron 705IT (HEM-759-E)
Pictures		
Display		
Validation		ESH-IP 2002
Device 1 Criteria	<p>Measurement</p> <p><i>Sensors</i></p> <p>Pressure sensor: 2nd sensor for dual check 5</p> <p>Buttons/Switches</p> <p><i>Settings</i></p> <p>Up and down 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>Hypertension (Indicator strip) 11, 13</p> <p>Average icon 11, 13, 14</p> <p>Body movement error 3, 11, 13, 18</p> <p>Irregular heartbeat 11, 13, 18</p>	

Devices	Omron M6 (HEM-7211-E8)	Omron 705IT (HEM-759-E)
Device 1 Criteria (continued)	<p>Display/Symbols/Indicators (continued)</p> <p><i>Settings</i></p> <p>Sensor cross check (LED) 5, 18</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><i>Parameter Settings</i></p> <p>Correct cuff wrapping detection 13</p> <p>Sensor cross check 5, 18</p>	
Same Criteria	<p>Measurement</p> <p><i>Accuracy</i></p> <p>BP accuracy ± 3 mmHg 1, 5</p> <p>Pulse accuracy $\pm 5\%$ 1, 5</p> <p><i>Method</i></p> <p>Oscillometric measurement method 1, 5</p> <p>Pulse 40 bpm -180 bpm 1, 5, 8</p> <p>Manually initiated measurements 13</p> <p>Measurements are from single inflations 13</p> <p><i>Inflation</i></p> <p>Inflation 0 mmHg - 299 mmHg 1, 5, 7</p> <p>Automatic Inflation 7</p> <p>Fuzzy Logic 7</p> <p>Press button if BP > 220 mmHg 7</p> <p>Manually adjustable inflation pressure 7</p> <p><i>Deflation</i></p> <p>Automatic Deflation 8</p> <p><i>Cuffs</i></p> <p>Large (Arm circ. 32-42 cm) (Optional) ^{Note 2} 6</p> <p>Small (Arm circ. 17-22 cm) (Optional) ^{Note 2} 6</p>	<p>Measurement</p> <p><i>Accuracy</i></p> <p>BP accuracy ± 3 mmHg 1, 5</p> <p>Pulse accuracy $\pm 5\%$ 1, 5</p> <p><i>Method</i></p> <p>Oscillometric measurement method 1, 5</p> <p>Pulse 40 bpm -180 bpm 1, 5, 8</p> <p>Manually initiated measurements 13</p> <p>Measurements are from single inflations 13</p> <p><i>Inflation</i></p> <p>Inflation 0 mmHg - 299 mmHg 1, 5, 7</p> <p>Automatic Inflation 7</p> <p>Fuzzy Logic 7</p> <p>Press button if BP > 220 mmHg 7</p> <p>Manually adjustable inflation pressure 7</p> <p><i>Deflation</i></p> <p>Automatic Deflation 8</p> <p><i>Cuffs</i></p> <p>Large (Arm circ. 32-42 cm) (Optional) ^{Note 2} 6</p> <p>Small (Arm circ. 17-22 cm) (Optional) ^{Note 2} 6</p>

Devices	Omron M6 (HEM-7211-E8)	Omron 705IT (HEM-759-E)
Same Criteria (continued)	<p>Buttons/Switches <i>Measurement Records</i> Memory 10</p> <p>Display/Symbols/Indicators <i>Measurement Procedure</i> Deflation symbol 11 During Measurement: BP Level & Heartbeat 11</p> <p><i>Post Measurement</i> SBP, DBP and Pulse 11</p> <p><i>Date and Time</i> Date and Time 11 Date and Time (During memory recall) 11</p> <p><i>Power</i> Low battery 11, 17</p> <p>Case <i>Display</i> Segment LCD 10</p> <p><i>Power</i> AC adapter (Optional) 17</p>	<p>Buttons/Switches <i>Measurement Records</i> Memory 10</p> <p>Display/Symbols/Indicators <i>Measurement Procedure</i> Deflation symbol 11 During Measurement: BP Level & Heartbeat 11</p> <p><i>Post Measurement</i> SBP, DBP and Pulse 11</p> <p><i>Date and Time</i> Date and Time 11 Date and Time (During memory recall) 11</p> <p><i>Power</i> Low battery 11, 17</p> <p>Case <i>Display</i> Segment LCD 10</p> <p><i>Power</i> AC adapter (Optional) 17</p>
Comparable Criteria	<p>Measurement <i>Cuffs</i> Medium 146 mm × 446 mm (Arm circ. 22 to 32 cm) ^{Note 2} 6</p> <p><i>Sensors</i> Pressure sensor: piezo-resistive ^{Note 1} 5</p> <p><i>Measurement Records</i> Memory: 90 measurements 14</p> <p>Buttons/Switches <i>Power</i> On/Off with Start/Stop (O/I Label) 10</p> <p><i>Settings</i> Date/Time set 10</p> <p>Display/Symbols/Indicators <i>Post Measurement</i> Measurement error E_1, E_2, E_3, E_4, E_5 and E_r ^{Note 3} 11</p> <p><i>Measurement Records</i> Memory icon 11</p>	<p>Measurement <i>Cuffs</i> Medium 140 mm × 480 mm (Arm circ. 22 to 32 cm) ^{Note 2} 6</p> <p><i>Sensors</i> Pressure sensor: capacitive ^{Note 1} 5</p> <p><i>Measurement Records</i> Memory: 28 measurements 14</p> <p>Buttons/Switches <i>Power</i> On/Off with Stop (O/I Label) 10 Start 10</p> <p><i>Settings</i> Adjust 10 Set 10</p> <p>Display/Symbols/Indicators <i>Post Measurement</i> Measurement error E and E_r ^{Note 3} 11</p> <p><i>Measurement Records</i> Memory "M" symbol 11</p>

Devices	Omron M6 (HEM-7211-E8)	Omron 705IT (HEM-759-E)
Comparable Criteria (continued)	Case	Case
	<i>Display</i> Single screen display 10	<i>Display</i> Dual screen display 10
	<i>Power</i> 4 “AA” batteries ~ 1500 measurements 17 Automatic switch-off when not used for 2 min 17	<i>Power</i> 4 “AA” (LR6) batteries ~ 300 measurements 17 Automatic switch-off when not used for 5 min 17
Device 2 Criteria		Display/Symbols/Indicators
		<i>Measurement Procedure</i> Inflation symbol 11
		Case
		<i>Ports</i> USB/Printer port 15 USB port, cable and PC software 16, 18
		<i>Features</i> Optional printer 15

Query	1	Query	<p>a) The cuffs for the Omron M6 (HEM-7211-E8) are the same as those for the Omron M6 (HEM-7211-E). In the equivalence application for the Omron M6 (HEM-7211-E) on 17/02/2010, a change in the cloth was declared. Tables and figures were supplied in response to a query at that time. The equivalence for the Omron M6 (HEM-7211-E8) is against the same device. Yet this difference is not included. Please explain.</p> <p>b) The dual check system (function and LED) is not included in the declaration.</p> <p>c) The fact that a printing facility is included in the Omron 705IT (HEM-759-E) but not in the Omron M6 (HEM-7211-E8) is not included in the declaration</p>
		Response	<p>a) <i>This was mistake. Please confirm the revised application.</i></p> <p>b) <i>This was mistake. Please confirm the revised application.</i></p> <p>c) <i>This was mistake. Please confirm the revised application.</i></p>
		Comment	The revised application is OK.
Notes	1		The Omron M6 (HEM-7211-E) was approved as equivalent to the Omron 705IT (HEM-759-E) on 26/08/2010. The Omron M6 (HEM-7211-E8) is identical to the M6 (HEM-7211-E) device except that the current pressure sensor (CPSU), a capacitive type, is changed to a new pressure sensor (NPS), a piezoelectric semiconductor type. Details of comparative tests 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

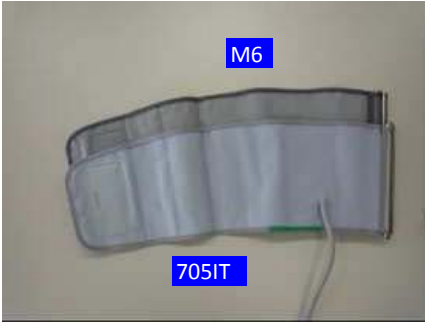


	<p>change in sensor, has been validated using the ESH-IP 2010 protocol and is recommended for use. Following a review of these documents, it was concluded that the change in sensor would not have a detrimental effect on the accuracy of the device.</p> <p>The manual for the HEM-7211-E was updated to refer to the HEM-7211-E and HEM-7211-E8. The main difference was the removal of the pressure detection item in the technical data section. The optional AC adapter has also changed.</p>						
<p>2</p>	<p>This query from the equivalence application for the HEM-7211-E is also applicable to the HEM-7211-E8.</p> <p>Query There appear to be some differences in the cuffs supplied with the monitors.</p> <p>a) There are different part numbers between those listed for the devices. These match the declaration of the different cloth covers. No difference is made in the declaration. It is taken that there are no changes.</p> <p>b) It is understood that the cloth changes apply to the large cuffs also.</p> <p>c) The dimensions of the cuff supplied with the Omron M6 (HEM-7211-E) differ from that supplied with the Omron 705IT (HEM-759-E), with which it is being compared. However, the declaration declares only a change in the outer cloth and that there is no change in size. Please explain.</p> <p>Response a) <i>These cuffs have no differences except cloth covers. The parts number difference comes from different cloth covers.</i></p> <p>b) <i>These cuffs have no differences except cloth covers.</i></p> <p>c) <i>Please confirm chart1 which explains the relation between the models and dimensions.</i></p> <p style="text-align: center;">Models and cuff dimensions</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Models</th> <th>Dimensions (in manual)</th> </tr> </thead> <tbody> <tr> <td>705IT</td> <td>140 mm x 480 mm</td> </tr> <tr> <td>M6</td> <td>146 mm x 446 mm</td> </tr> </tbody> </table> <p><i>The actual size of these cuffs is same (Fig1).</i></p> <div style="display: flex; justify-content: space-around;">    </div>	Models	Dimensions (in manual)	705IT	140 mm x 480 mm	M6	146 mm x 446 mm
Models	Dimensions (in manual)						
705IT	140 mm x 480 mm						
M6	146 mm x 446 mm						

Fig1 Size comparison

The dimensions in manual were different because the measurement point was different. (Fig4)

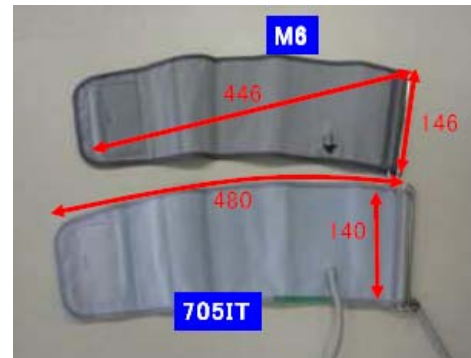


Fig2 Measurement point

However, this does not make any difference to measurement accuracy because the dimensions of bladder are all the same. In order not to confuse users, we will standardize the measurement point of cuff and describe the standardize dimensions in the manual.

Comment The explanation is accepted

This query from the equivalence application for the HEM-7211-E is also applicable to the HEM-7211-E8.

Query There appear to be some differences in the error codes (apart from the extra features) which would not be expected if there were no algorithm changes. In the list, a slash indicates a line break where the error code is on two lines. Please explain.

Response Regarding to Group 3, the 705IT error code E had subdivide to E1, E2, E3, E4 and E5. 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).

3

Group 3 Error Codes

Model	Error codes					
705IT	E					Er
M6	E1	E2	E3	E2	E5	Er

	<div data-bbox="1003 199 1563 523" data-label="Diagram"> <p>The diagram consists of two rectangular boxes. The left box is titled "705IT error code" and contains two smaller boxes: "E" at the top and "Er" at the bottom. The right box is titled "M6 error code" and contains five smaller boxes stacked vertically: "E1", "E2", "E3", "E4", and "E5" from top to bottom, followed by "Er" at the bottom. Five arrows originate from the "E" box in the left box and point to each of the "E1" through "E5" boxes in the right box. A single arrow originates from the "Er" box in the left box and points to the "Er" box in the right box.</p> </div> <p data-bbox="465 547 949 579">Comment The explanation is accepted</p>
<p>Recommendation</p>	<p>Equivalence is recommended.</p>
<p>Date</p>	<p>02/07/2012</p>