

DE NOVO CLASSIFICATION REQUEST FOR

DentalMonitoring

REGULATORY INFORMATION

FDA identifies this generic type of device as:

Dental Image Analyzer. A dental image analyzer is a prescription home use device that uses software intended to collect and analyze patient-specific, optical camera-based, intraoral images. The analyses are provided to dental health care professionals as an aid to diagnosis of oral health conditions and/or to monitor treatment progress.

NEW REGULATION NUMBER: 872.1770

CLASSIFICATION: Class II

PRODUCT CODE: SBC

BACKGROUND

DEVICE NAME: DentalMonitoring

SUBMISSION NUMBER: DEN230035

DATE DE NOVO RECEIVED: 05/04/2023

SPONSOR INFORMATION:

Dental Monitoring SAS
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INDICATIONS FOR USE

DentalMonitoring is a medical device software using image processing algorithms to analyze pictures of the oral cavity (hereinafter Scans). Scans are taken using the DM App, a smartphone, and the manufacturer's proprietary hardware products. Scans are taken by the patient, a non-healthcare professional, or a healthcare professional. The Scan is taken in healthcare facilities, such as a dental practice, or in a non-healthcare environment, such as the patient's own home. For some clinical parameters, DentalMonitoring requires a 3D Model. The product is designed to assist healthcare professionals in remotely monitoring orthodontic treatments and treatment progress. The results of DentalMonitoring are intended to be used as an aid in diagnosis and monitoring, not on a stand-alone basis for clinical decision-making. DentalMonitoring is indicated for use for patients over the age of 6 and reports results solely on permanent teeth.

DentalMonitoring can monitor the following clinical parameters:

- oral hygiene: dental plaque / food residue;
- soft tissue statement: gingival recession, black triangle;
- dental statement: closure of extraction space, tooth wear;
- alignment: closure of all anterior spaces; and
- dental occlusion:
 - in 2D Monitoring: midline deviation, overbite/open bite, overjet

- in 3D Monitoring: canine class, midline deviation, overbite/open bite, overjet

Additionally, the following clinical parameters specific to orthodontic treatment types or phases can be monitored using DentalMonitoring:

- for aligner treatments: tracking (seat/unseat), attachment loss, button loss;
- for braces: bracket debonding, tie loss, self-ligating clips, passive archwire and auxiliaries; and
- for thermoformed retainers: tracking (seat/unseat).

Based on an initial 3D Model provided by a healthcare professional, DentalMonitoring can also provide healthcare professionals with 3D Models representative of the patient's dentition and treatment progress. This device is a prescription device and is not intended for over-the-counter use

LIMITATIONS

DentalMonitoring should not be used on patients under the age of 6.

Dental Monitoring should not be used by patients presenting systemic conditions affective connective tissues not allowing them to open/close their buccal cavity sufficiently to acquire acceptable Scans.

The following population should be assisted by a third party to perform Scans:

- Children up to 12;
- Adults or children visually impaired;
- Adults or children hearing impaired;
- Or any condition that might prevent the patient from adopting the right position to take a Scan.

DentalMonitoring is not intended to replace standard practices for diagnosis or treatment. Final clinical decisions remain the sole responsibility of the healthcare professional. In order to establish a diagnosis, further examinations are required according to the current standard of care, such as dental radiographs and/or tactile examinations with instrumentation.

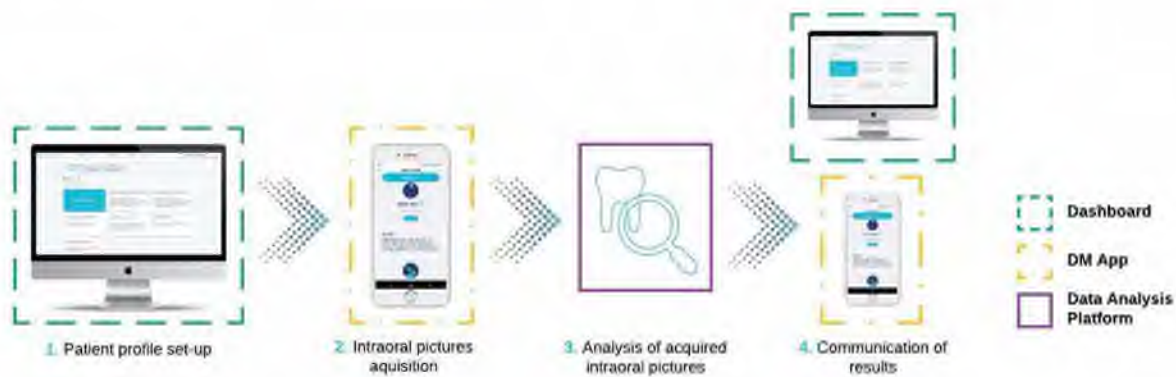
DentalMonitoring results are limited only to elements visible in the input Scans. DentalMonitoring does not provide results on non-visible elements such as potential interproximal and lingual cavities.

DentalMonitoring does not provide results on lingual surfaces.

PLEASE REFER TO THE LABELING FOR A COMPLETE LIST OF WARNINGS, PRECAUTIONS AND CONTRAINDICATIONS.

DEVICE DESCRIPTION

DentalMonitoring is a standalone software with embedded artificial intelligence comprising machine learning and locked neural network algorithms. The product is composed of these parts: the Dashboard, the DM App along with a DM Cheek Retractor and DM ScanBox, and the Data Analysis Platform.



The four steps are detailed below:

1. **Patient profile set-up:** The healthcare professional sets up the patient profile through a web- based interface, Dashboard, accessible at www.dental-monitoring.com/doctor. During the patient profile set-up, the healthcare professional is prompted to set up a Protocol in order to select the clinical parameters they wish to monitor in accordance with the patient's treatment. During the set-up, the healthcare professional also determines the appropriate frequency at which the patient should use the DM App to take pictures of their intraoral cavity.
2. **Intraoral pictures acquisition:** A set of pictures of the patient's intraoral cavity, hereinafter referred to as a Scan, is taken using the DM App along with a DM Cheek Retractor and DM ScanBox. The DM Cheek Retractor is an intraoral retraction device for the cheeks and lips to allow for sufficient space for image capture. The DM ScanBox is an extraoral holding apparatus for the smartphone that attaches to the DM Cheek Retractor. The DM App guides the user through the appropriate steps in order to obtain a complete Scan. This DM App is a mobile application installed on a smartphone; thus, the pictures are captured through the smartphone's main camera allowing the procedure to be totally non-invasive to the patient.

3. **Analysis of acquired intraoral pictures:** The Scan is processed through the Data Analysis Platform. The Data Analysis Platform includes a technical processing phase and clinical processing phase, the latter being a clinical analysis to determine if any event has occurred within the clinical parameters the healthcare professional has set up to be monitored. The Data Analysis Platform uses AI comprising image processing algorithms and neural networks.
4. **Communication of results:** Results of the analysis performed through the Data Analysis Platform are communicated to the healthcare professional through the Dashboard on one hand, and to the patient through the DM App on the other hand. Results are shared with the healthcare professional in an exhaustive fashion, providing them with detailed information. As for the patient, the results are communicated in accordance with the rules defined by the healthcare professional in the Protocol applied to the patient.

DentalMonitoring enables HCPs to adapt the use of the product according to their needs depending on each patient's orthodontic treatment. DentalMonitoring comprises two types of monitoring: 2D Monitoring and 3D Monitoring. Some clinical parameters are specific to either 2D Monitoring, or 3D Monitoring.

SUMMARY OF NONCLINICAL/BENCH STUDIES

BIOCOMPATIBILITY/MATERIALS

The DM Cheek Retractor were evaluated per ISO 10993-1 (2020): "Biological evaluation of medical devices Part 1: evaluation and testing with a risk management" and ISO 7405-2018 – Dentistry – evaluation of biocompatibility of medical devices used in dentistry. The proposed device passed cytotoxicity tests according to ISO 10993-5, skin sensitization according to ISO 10993-10, and irritation or intracutaneous reactivity according to ISO 10993-23.

SOFTWARE

DentalMonitoring has a Moderate Level of Concern (LOC). Appropriate software documentation for was provided in compliance with the FDA guidance document "*Guidance for the Content of Premarket Submissions for Software Contained in Medical Devices*" (issued in May 2005). Verification and validation (V&V) activities were performed and described at the unit and system level.

CYBER SECURITY

DentalMonitoring approach to cybersecurity aligns with FDA's 2020 guidance titled, "Guidance on Cybersecurity For Medical Devices" The device also conforms to the cybersecurity requirements identified in Section 524B to the FD&C Act.

PERFORMANCE TESTING - BENCH

AI/ML standalone testing

Standalone performance of each neural network and algorithm was evaluated. Neural networks and algorithms were classified into three families according to the outputs they provide. A unique protocol was established per family in order to perform the evaluation, with acceptance criteria adapted to each neural network and algorithm. DentalMonitoring comprises technical neural networks and algorithms as well as clinical neural networks and algorithms. The standalone testing showed acceptable performance of critical

features to demonstrate the device's ability to perform both its clinical and technological functions.

SUMMARY OF CLINICAL INFORMATION

The Sponsor provided data from a Clinical Investigation Program to support the clinical performance of DentalMonitoring.

DentalMonitoring Clinical Investigation Program

Study type	Study code	Study name	Overview of targeted indications	List of (indication; monitoring plan) couples targeted
Retrospective	21-001	Retrospective	Qualitative indications with Reference Method compatible with DentalMonitoring picture set review	(dental plaque / food residue; 2D) (gingival recession; 2D) (black triangle; 2D) (closure of extraction space; 2D) (closure of all anterior spaces; 2D) (tracking (seat/unseat); 2D) (attachment loss; 2D) (button loss; 2D) (bracket debonding; 2D) (tie loss; 2D) (self-ligating clips; 2D)
Study type	Study code	Study name	Overview of targeted indications	List of (indication; monitoring plan) couples targeted
Prospective	21-002	Occlusion	Occlusion indications	(canine class; 3D) (midline deviation; 2D) (midline deviation; 3D) (overbite/open bite; 2D) (overbite/open bite; 3D) (overjet; 2D) (overjet; 3D)
Prospective	21-003	Archwire & Auxiliaries	Passive archwire and auxiliaries indication	(passive archwire and auxiliaries; 2D) (passive archwire and auxiliaries; 3D)
Prospective	21-004	Updated 3D Model	Updated 3D Model indication	(Updated 3D Model; 3D)

Retrospective study

DentalMonitoring evaluated the qualitative indications that were able to have the Reference Method used solely DentalMonitoring picture sets (= Scan). The study was performed using Scans retrospectively collected and involved a total of 15 US orthodontists.

The Reference Method results were generated as follow:

- Scans were reviewed by a panel of three independent orthodontists with an assessment done per tooth / interdental space.
- In case of non-dominant results, a consensus was established by the same group of three independent orthodontists. Dominant results and result of the consensus review were merged in order to generate the Reference Method initial outcome.
- Per indication, results presenting discrepancies between the Reference Method and the Candidate Method, *i.e.*, False Positive results and False Negative results, were reviewed by one of the orthodontists among the 15 that took part in the study.

Data was collected in order to qualify the patient demographics.

Results per indication

Dental plaque / food residue

Characteristic	# (%)
Age group	
12- 22 years of age	367 (49.5%)
≥ 22 years of age	4 (0.6%)
≤12 years old	369 (49.8%)
Unknown	1 (0.1%)
Location	
Central	420 (56.7%)
East Coast	209 (28.2%)
US - Other	5 (0.7%)
West Coast	60 (8.1%)
Western	30 (4.0%)
Out of US	17 (2.3%)
Treatment type	
Aligners	415 (56.0%)
Brackets - Ceramic	9 (1.2%)
Brackets - Self-ligating	128 (17.3%)
Brackets - Traditional	135 (18.2%)
Mixed	32 (4.3%)
None	5 (0.7%)
Retainers	17 (2.3%)

Final comparison between DentalMonitoring and Reference

		Reference Result		
		Positive (Noticeable or Slight)	Negative	Total
DM Result	Positive (Noticeable or Slight)	1,874	356	2,230
	Negative	362	2,472	2,834
	Total	2,236	2,828	5,064

Final study results for dental plaque / food residue

	Result	95% CI Lower Bound	95% CI Upper Bound
Sensitivity	82.5%	79.9%	84.8%
Specificity	83.2%	80.5%	85.5%

Scans were taken using the following phone manufacturers: Apple, Samsung, Google, Motorola, LG, OnePlus, Huawei, Xiaomi, Essential Phone

Gingival recession

Characteristic	# (%)
Age group	
12- 22 years of age	205 (51.3%)
≥ 22 years of age	194 (48.5%)
≤12 years old	1 (0.2%)
Location	
Central	236 (59%)
East Coast	96 (24%)
West Coast	30 (7.5%)
US - Other	5 (1.2%)
Out of US	12 (3%)
Western	21 (5.3%)
Treatment type	
Aligners	205 (51.2%)
Retainers	17 (4.2%)
Brackets - Ceramic	7 (1.8%)
Brackets - Self-ligating	68 (17%)
Brackets - Traditional	82 (20.5%)
Mixed treatment	20 (5%)
No treatment	1 (0.3%)

Final comparison between DentalMonitoring and Reference

		Reference Result		
		Positive	Negative	Total
DM Result	Positive	77	18	95
	Negative	19	756	775
	Total	96	774	870

Final study results for gingival recession

	Result	95% CI Lower Bound	95% CI Upper Bound
Sensitivity	79.9%	70.3%	86.9%
Specificity	97.4%	95.8%	98.4%

Scans were taken using the following phone manufacturers: Apple, Samsung, Google, Motorola, LG, Huawei, Essential Phone, Kyocera, OnePlus, and Wiko.

Black triangle

Characteristic	# (%)
Age group	
12 - 22 years of age	233 (62%)
≥ 22 years of age	140 (37.2%)
≤ 12 years old	3 (0.8%)
Location	
Central	231 (61.4%)
East Coast	97 (25.8%)
West Coast	23 (6.1%)
Out of US	7 (1.9%)
Western	14 (3.7%)
US-Other	4 (1.1%)
Treatment type	
Aligners	166 (44.2%)
Retainers	12 (3.2%)
Brackets - Ceramic	9 (2.4%)
Brackets - Self-ligating	79 (21%)
Brackets - Traditional	87 (23.1%)
Mixed treatment	21 (5.6%)
No treatment	2 (0.5%)

Final comparison between DentalMonitoring and Reference

		Reference Result		
		Positive	Negative	Total
DM Result	Positive	179	12	191
	Negative	40	906	946
	Total	219	918	1,137

Final study results for black triangle

	Result	95% CI Lower Bound	95% CI Upper Bound
Sensitivity	81.0%	73.9%	86.5%
Specificity	98.4%	96.9%	99.2%

Scans were taken using the following phone manufacturers: Apple, Samsung, Google, Motorola, LG, OnePlus, Huawei, and Xiaomi.

Closure of extraction space

Characteristic	# (%)
Age group	
12 -22 years of age	105 (41.3%)
≥ 22 years of age	5 (2.0%)
≤ 12 years old	142 (55.9%)
Unknown	2 (0.8%)
Location	
Central	137 (53.9%)
East Coast	67 (26.4%)
US - Other	6 (2.4%)
West Coast	25 (9.8%)
Western	11 (4.3%)
out of US	8 (3.2%)
Treatment type	
Aligners	125 (49.2%)
Brackets - Ceramic	3 (1.2%)
Brackets - Self-ligating	55 (21.7%)
Brackets - Traditional	44 (17.3%)
Mixed treatment	16 (6.3%)
None	1 (0.4%)
Retainers	10 (3.9%)

Final comparison between DentalMonitoring and Reference

		Reference Result		
		Positive	Negative	Total
DM Result	Positive	198	24	222
	Negative	0	256	256
	Total	198	280	478

Final study results for closure of extraction space

	Result	95% CI Lower Bound	95% CI Upper Bound
Sensitivity	100.0%	94.2%	/
Specificity	91.8%	87.2%	94.9%

Scans were taken using the following phone manufacturers: Apple, Samsung, LG, Google, Motorola, Essential Phone, Huawei, and Wiko.

Tooth wear

Characteristic	# (%)
Age group	
12 - 22 years of age	200 (54.8%)
≥ 22 years of age	164 (44.9%)
≤ 12 years old	1 (0.3%)
Location	
Central	232 (63.6%)
East Coast	83 (22.7%)
West Coast	22 (6.0%)
Western	14 (3.8%)
Out of US	11 (3.0%)
US-Other	3 (0.8%)
Treatment type	
Aligners	162 (44.4%)
Brackets - Ceramic	5 (1.4%)
Brackets - Self-ligating	74 (20.3%)
Brackets - Traditional	88 (24.1%)
Mixed	1 (0.3%)
Mixed treatment	22 (6%)
None	1 (0.3%)
Retainers	12 (3.3%)

Final comparison between DentalMonitoring and Reference

		Reference Result		
		Positive	Negative	Total
DM Result	Positive	89	21	110
	Negative	13	943	956
	Total	102	964	1,066

Final study results for tooth wear

	Result	95% CI Lower Bound	95% CI Upper Bound
Sensitivity	84.5%	74.1%	91.2%
Specificity	97.0%	94.9%	98.2%

Scans were taken using the following phone manufacturers: Apple, Samsung, LG, Google, Motorola, Huawei, and Essential Phone.

Closure of all anterior spaces

Characteristic	# (%)
Age group	
12 - 22 years of age	297 (57.5%)
≥ 22 years of age	213 (41.3%)
≤ 12 years old	4 (0.8%)
Unknown	2 (0.4%)
Location	
Central	307 (59.5%)
East Coast	131 (25.4%)
West Coast	38 (7.4%)
Out of US	10 (1.9%)
US - Other	4 (0.8%)
Western	26 (5.0%)
Treatment type	
Aligners	248 (48.1%)
Brackets - Ceramic	6 (1.2%)
Brackets - Self-ligating	114 (22.1%)
Brackets - Traditional	106 (20.5%)
Mixed	2 (0.4%)
Mixed treatment	21 (4.1%)
None	6 (1.2%)
Retainers	13 (2.5%)

Final comparison between DentalMonitoring and Reference

		Reference Result		
		Positive	Negative	Total
DM Result	Positive	180	88	268
	Negative	3	442	445
	Total	183	530	713

Final study results for anterior space closure

	Result	95% CI Lower Bound	95% CI Upper Bound
Sensitivity	98.3%	94.9%	99.5%
Specificity	83.3%	79.9%	86.3%

Scans were taken using the following phone manufacturers: Apple, Samsung, Google, Motorola, LG, Huawei, T-Mobile, Essential Phone, and Xiaomi.

Tracking (seat/unseat)

Characteristic	# (%)
Age group	
]12; 22[years of age	279 (44.8%)
≥ 22 years of age	332 (53.3%)
≤ 12 years old	9 (1.4%)
Unknown	3 (0.5%)
Location	
Central	286 (45.9%)
East Coast	192 (30.8%)
out of US	17 (2.7%)
US - Other	8 (1.3%)
West Coast	85 (13.7%)
Western	35 (5.6%)
Treatment type	
Aligners	581 (93.3%)
Brackets - Traditional	4 (0.6%)
Mixed	1 (0.2%)
Mixed treatment	9 (1.4%)
Retainers	28 (4.5%)

Clinical performances are expressed as two different Sensitivities and Specificities since the parameter outputs three levels.

- Sensitivity and Specificity of the product in its ability to detect people with the evaluated condition from people without; and
- Sensitivity and Specificity of the product in its ability to discriminate the evaluated condition at a slight level from a noticeable level

Detection of patients with the evaluated condition (presence/absence)

		Reference Result		
		Positive (Noticeable or Slight)	Negative	Total
DM Result	Positive (Noticeable or Slight)	1,360	165	1,525
	Negative	101	1,697	1,798
	Total	1,461	1,862	3,323

	Result	95% CI Lower Bound	95% CI Upper Bound
Sensitivity	93.2%	91.3%	94.7%
Specificity	86.2%	83.4%	88.6%

Detection of patients with the level of the condition (slight/noticeable)

		Reference Result		
		Noticeable	Slight	Total
DM Result	Noticeable	193	99	292
	Slight	18	1,050	1,068
	Total	211	1,149	1,360

	Result	95% CI Lower Bound	95% CI Upper Bound
Sensitivity	91.1%	85.9%	94.5%
Specificity	90.5%	87.7%	92.7%

Scans were taken using the following phone manufacturers: Apple, Samsung, Google, LG, Motorola, OnePlus, Huawei, Essential Phone, Wiko, and Xiaomi.

Attachment loss

Characteristic	# (%)
Age group	
]12; 22[years of age	146 (41.9%)
≥ 22 years of age	200 (57.5%)
≤ 12 years old	1 (0.3%)
Unknown	1 (0.3%)
Location	
Central	171 (49.1%)
East Coast	109 (31.3%)
West Coast	39 (11.2%)
US - Other	4 (1.2%)
Out of US	8 (2.3%)
Western	17 (4.9%)
Treatment type	
Aligners	330 (94.8%)
Retainers	8 (2.3%)
Brackets - Traditional	4 (1.2%)
Mixed treatment	6 (1.7%)

Final comparison between DentalMonitoring and Reference

		Reference Result		
		Positive	Negative	Total
DM Result	Positive	183	0	183
	Negative	3	579	582
	Total	186	579	765

Final study results for attachment loss

	Result	95% CI Lower Bound	95% CI Upper Bound
Sensitivity	98.2%	94.3%	99.4%
Specificity	100.0%	98.7%	/

Scans were taken using the following phone manufacturers: Apple, Samsung, Google, Motorola, LG, Xiaomi, OnePlus, and Essential Phone.

Button loss

Characteristic	# (%)
Age group	
]12; 22[years of age	200 (52.5%)
≥ 22 years of age	158 (41.5%)
≤ 12 years old	20 (5.2%)
Unknown	3 (0.8%)
Location	
Central	138 (36.2%)
East Coast	125 (32.8%)
West Coast	92 (24.1%)
Out of US	4 (1%)
Western	16 (4.2%)
US - Other	6 (1.6%)
Treatment type	
Aligners	370 (97.1%)
Retainers	1 (0.3%)
Brackets - Ceramic	1 (0.3%)
Brackets - Traditional	3 (0.8%)
Mixed treatment	6 (1.6%)

Final comparison between DentalMonitoring and Reference

		Reference Result		
		Positive	Negative	Total
DM Result	Positive	127	5	132
	Negative	2	525	527
	Total	129	530	659

Final study results for button loss

	Result	95% CI Lower Bound	95% CI Upper Bound
Sensitivity	98.4%	94.0%	99.6%
Specificity	99.0%	96.9%	99.7%

Scans were taken using the following phone manufacturers: Apple, Samsung, LG, Motorola, Google, and Huawei.

Bracket debonding

Characteristic	# (%)
Age group	
]12; 22[years of age	270 (71.3%)
≥ 22 years of age	107 (28.2%)
≤ 12 years old	2 (0.5%)
Location	
Central	291 (76.8%)
East Coast	60 (15.8%)
West Coast	16 (4.2%)
Out of US	1 (0.3%)
Western	11 (2.9%)
Treatment type	
Aligners	1 (0.3%)
Brackets - Ceramic	10 (2.5%)
Brackets - Self-ligating	171 (45.1%)
Brackets - Traditional	150 (39.6%)
Mixed treatment	45 (11.9%)
None	1 (0.3%)
Retainers	1 (0.3%)

Final comparison between DentalMonitoring and Reference

		Reference Result		
		Positive	Negative	Total
DM Result	Positive	127	2	129
	Negative	2	528	530
	Total	129	530	659

Final study results for bracket debonding

	Result	95% CI Lower Bound	95% CI Upper Bound
Sensitivity	98.4%	93.8%	99.6%
Specificity	99.6%	98.5%	99.9%

Scans were taken using the following phone manufacturers: Apple, Samsung, Google, LG, Motorola, One Plus.

Tie loss

Characteristic	# (%)
Age group	
]12; 22[years of age	240 (77.4%)
≥ 22 years of age	66 (21.3%)
≤ 12 years old	4 (1.3%)
Location	
Central	255 (82.2%)
East Coast	39 (12.6%)
West Coast	10 (3.2%)
Western	3 (1.0%)
Out of US	3 (1.0%)
Treatment type	
Aligners	1 (0.3%)
Brackets - Ceramic	13 (4.2%)
Brackets - Self-ligating	5 (1.6%)
Brackets - Traditional	267 (86.2%)
Mixed	1 (0.3%)
Mixed treatment	23 (7.4%)

Final comparison between DentalMonitoring and Reference

		Reference Result		
		Positive	Negative	Total
DM Result	Positive	111	15	126
	Negative	7	520	527
	Total	118	535	653

Final study results for tie loss

	Result	95% CI Lower Bound	95% CI Upper Bound
Sensitivity	93.3%	85.7%	97.0%
Specificity	96.5%	94.0%	98.0%

Scans were taken using the following phone manufacturers: Apple, Samsung, Motorola, LG, Google.

Self-ligating clips

Characteristic	# (%)
Age group	
]12; 22[years of age	217 (66.8%)
≥ 22 years of age	103 (31.7%)
≤ 12 years old	5 (1.5%)
Location	
Central	225 (69.3%)
East Coast	69 (21.2%)
Western	16 (4.9%)
West Coast	12 (3.7%)
Out of US	3 (0.9%)
Treatment type	
Brackets - Ceramic	5 (1.5%)
Brackets - Self-ligating	262 (80.6%)
Brackets - Traditional	21 (6.5%)
Mixed	2 (0.6%)
Mixed treatment	35 (10.8%)

Final comparison between DentalMonitoring and Reference

		Reference Result		
		Positive	Negative	Total
DM Result	Positive	71	48	119
	Negative	7	521	528
	Total	78	569	647

Final study results for self-ligating clip

	Result	95% CI Lower Bound	95% CI Upper Bound
Sensitivity	91.1%	82.5%	95.7%
Specificity	88.3%	84.1%	91.5%

Scans were taken using the following phone manufacturers: Apple, Samsung, Google, LG, Motorola, Huawei, Kyocera, and OnePlus.

Occlusion study

DentalMonitoring evaluated the occlusion indications using 3D Models acquired with intraoral scanners as input data to the Reference Method. The study was performed using data collected prospectively. The study involved four sites located in the United States: three sites for patient enrollment and one site for generation of the Reference Method results.

The Reference Method results were generated by measuring the occlusion parameters undergoing evaluation on 3D Models of the patients enrolled in the study. Measurements were done manually and performed in three replicates using a CAD/CAM software.

Analysis was performed according to “*Measurement Procedure Comparison and Bias Estimation Using Patient Samples; Clinical and Laboratory Standards Institute guideline*”, EP09c - Third Edition, 2018. Analysis comprised using a :Passing-Bablok regression analysis, including plots of Candidate Method verses Reference Method to calculate the slope, intercept, and correlation coefficient of the plot. Bias at levels of interest per study group were computed at the levels of interest and confidence intervals were calculated with the 95% Bootstrapping.

Data was collected in order to qualify the patient demographics.

Results per indication

Canine class – 3D Monitoring

A total of 215 patients rendering 297 results were included in the analysis. One patient could render multiple results corresponding to left canine class and right canine class.

Characteristic	# (%)
Gender	
Male	153 (71.2%)
Female	62 (28.8%)
Age group	
[6; 12] years of age	23 (10.7%)
]12; 22[years of age	75 (34.9%)
≥ 22 years of age	117 (54.4%)
Race*	
American Indian or Alaska Native	13 (6.0%)
Asian	10 (4.7%)
Black or African American	12 (5.6%)
Native Hawaiian or Other Pacific Islander	0 (0.0%)
White	168 (78.1%)
Unknown race	14 (6.5%)
Ethnicity	
Spanish origin	32 (14.9%)
Not Hispanic or Latino	183 (85.1%)
Income of the household (annual)	
Less than \$19,999	9 (4.2%)
\$20,000-\$37,999	11 (5.1%)
\$38,000-\$44,999	3 (1.4%)
\$45,000-\$54,999	7 (3.3%)
\$55,000-\$64,999	14 (6.5%)
\$65,000-\$74,999	11 (5.1%)
\$75,000-\$99,999	25 (11.6%)
\$100,000 or more	69 (32.1%)
Unknown	66 (30.7%)
Level of education	
< Highschool Diploma	84 (39.1%)
Highschool Diploma or Equivalent	38 (17.6%)
Associates Degree	25 (11.6%)
Bachelors Degree	44 (20.5%)
Masters Degree	20 (9.3%)
Doctoral Degree	4 (1.9%)

**Of note, the race does not correspond to the total number of patients as some patients with mixed races were included in the analysis.*

Slope	0,95 [0.92, 0.98]
Intercept	-0.10 mm [-0.14, -0.04]*
Bias at 0.00 mm	-0.10 mm [-0.18, 0.00]*
Bias at -2.00 mm	-0.3% [-4.9, 6.8]
Bias at 3.00 mm	-9.4 % [-12.9, -5.3]
Bias at 5.00 mm	-7.9 % [-11.0, -4.4]

*Of note, the difference between the two 95% CI is due to the fact that the bootstrap is used for bias CI calculation, whereas for the intercept and slope it is the standard CI calculation linked to Passing-Bablok regression that is used.

Midline deviation – 2D Monitoring

A total of 277 patients rendering 277 results were included in the analysis. One patient rendered a unique result.

Characteristic	# (%)
Gender	
Male	191 (69.0%)
Female	86 (31.0%)
Age group	
[6; 12] years of age	36 (13.0%)
]12; 22[years of age	94 (33.9%)
≥ 22 years of age	147 (53.1%)
Race*	
American Indian or Alaska Native	12 (4.3%)
Asian	11 (4.0%)
Black or African American	26 (9.4%)
Native Hawaiian or Other Pacific Islander	0 (0.0%)
White	215 (77.6%)
Unknown race	16 (5.7%)
Ethnicity	
Spanish origin	37 (13.4%)
Not Hispanic or Latino	240 (86.6%)
Income of the household (annual)	
Less than \$19,999	12 (4.3%)
\$20,000-\$37,999	14 (5.1%)
\$38,000-\$44,999	6 (2.2%)
\$45,000-\$54,999	7 (2.5%)
\$55,000-\$64,999	14 (5.1%)
\$65,000-\$74,999	18 (6.5%)
\$75,000-\$99,999	29 (10.5%)
\$100,000 or more	100 (36.1%)
Unknown	77 (27.7%)
Level of education	
< Highschool Diploma	100 (36.1%)
Highschool Diploma or Equivalent	54 (19.5%)
Associates Degree	31 (11.2%)
Bachelors Degree	58 (20.9%)
Masters Degree	29 (10.5%)
Doctoral Degree	5 (1.8%)

**Of note, the race does not correspond to the total number of patients as some patients with mixed races were included in the analysis.*

Slope	0.93 [0.89, 0.97]
Intercept	0.0 mm (-0.03) [0.0, 0.0] [-0.05, 0.01]*
Bias at 0.0 mm	0.0 mm (0.03) [0.0, 0.0] [-0.07, 0.03]*
Bias at -2.0 mm	5.3% [-0.8, 10.7]
Bias at 2.0 mm	-8.9% [-13.6, -3.2]

*Of note, the difference between the two 95% CI is due to the fact that the bootstrap is used for bias CI calculation, whereas for the intercept and slope it is the standard CI calculation linked to Passing-Bablok regression that is used.

Midline deviation – 3D Monitoring

A total of 291 patients rendering 294 results were included in the analysis. One patient rendered a unique result.

Characteristic	# (%)
Gender	
Male	200 (68.7%)
Female	91 (31.3%)
Age group	
[6; 12] years of age	47 (16.2%)
]12; 22[years of age	98 (33.6%)
≥ 22 years of age	146 (50.2%)
Race*	
American Indian or Alaska Native	12 (4.1%)
Asian	6 (2.1%)
Black or African American	26 (8.9%)
Native Hawaiian or Other Pacific Islander	0 (0.0%)
White	224 (77.0%)
Unknown race	30 (10.3%)
Ethnicity	
Spanish origin	38 (13.1%)
Not Hispanic or Latino	253 (86.9%)
Income of the household (annual)	
Less than \$19,999	12 (4.1%)
\$20,000-\$37,999	16 (5.5%)
\$38,000-\$44,999	6 (2.1%)
\$45,000-\$54,999	7 (2.4%)
\$55,000-\$64,999	15 (5.2%)
\$65,000-\$74,999	18 (6.2%)
\$75,000-\$99,999	33 (11.3%)
\$100,000 or more	101 (34.7%)
Unknown	83 (28.5%)
Level of education	
< Highschool Diploma	109 (37.5%)
Highschool Diploma or Equivalent	55 (18.8%)
Associates Degree	36 (12.4%)
Bachelors Degree	61 (21.0%)
Masters Degree	28 (9.6%)
Doctoral Degree	2 (0.7%)

**Of note, the race does not correspond to the total number of patients as some patients with mixed races were included in the analysis.*

Slope	0.98 [0.96, 1.00]
Intercept	-0.01 mm [-0.02, 0.01]*
Bias at 0.0 mm	-0.01 mm [-0.03, 0.02]*
Bias at -2.00 mm	2.0 % [-0.5, 4.8]
Bias at 2.00 mm	-2.7% [-5.2, -0.4]

*Of note, the difference between the two 95% CI is due to the fact that the bootstrap is used for bias CI calculation, whereas for the intercept and slope it is the standard CI calculation linked to Passing-Bablok regression that is used. *Interpretation of bias signs*

Overbite / open bite – 2D Monitoring

A total of 285 patients rendering 301 results were included in the analysis. One patient could render multiple results corresponding to both central incisor couples.

Characteristic	# (%)
Gender	
Male	194 (68.1%)
Female	91 (31.9%)
Age group	
[6; 12] years of age	36 (12.7%)
]12; 22[years of age	87 (30.5%)
≥ 22 years of age	162 (56.8%)
Race*	
American Indian or Alaska Native	10 (3.5%)
Asian	11 (3.9%)
Black or African American	32 (11.2%)
Native Hawaiian or Other Pacific Islander	0 (0.0%)
White	216 (75.8%)
Unknown race	21 (7.4%)
Ethnicity	
Spanish origin	36 (12.6%)
Not Hispanic or Latino	249 (87.4%)
Income of the household (annual)	
Less than \$19,999	11 (3.9%)
\$20,000-\$37,999	16 (5.5%)
\$38,000-\$44,999	8 (2.8%)
\$45,000-\$54,999	7 (2.5%)
\$55,000-\$64,999	12 (4.2%)
\$65,000-\$74,999	19 (6.7%)
\$75,000-\$99,999	33 (11.6%)
\$100,000 or more	103 (36.1%)
Unknown	76 (26.7%)
Level of education	
< Highschool Diploma	102 (35.8%)
Highschool Diploma or Equivalent	51 (17.9%)
Associates Degree	31 (10.9%)
Bachelors Degree	65 (22.8%)
Masters Degree	32 (11.2%)
Doctoral Degree	4 (1.4%)

**Of note, the race does not correspond to the total number of patients as some patients with mixed races were included in the analysis.*

Slope	0.95 95% CI = [0.91, 0.99]
Intercept	0.2 mm 95% CI = [0.1, 0.3]*
Bias at 0.0 mm	0.2 mm 95% CI = [0.0, 0.3]*
Bias at 3.0 mm	0.9% 95% CI = [-2.4, 3.7]
Bias at 5.0 mm	-1.3 % 95% CI = [-4.1, 1.2]
Bias at 7.0 mm	-2.3 % 95% CI = [-5.5, 0.5]

*Of note, the difference between the two 95% CI is due to the fact that the bootstrap is used for bias CI calculation, whereas for the intercept and slope it is the standard CI calculation linked to Passing-Bablok regression that is used.

Overbite / open bite – 3D Monitoring

A total of 287 patients rendering 298 results were included in the analysis. One patient could render multiple results corresponding to both central incisor couples.

Characteristic	# (%)
Gender	
Male	90 (31.4%)
Female	197 (68.6%)
Age group	
[6; 12] years of age	42 (14.6%)
]12; 22[years of age	89 (31%)
≥ 22 years of age	156 (54.4%)
Race*	
American Indian or Alaska Native	10 (3.5%)
Asian	10 (3.5%)
Black or African American	31 (10.8%)
Native Hawaiian or Other Pacific Islander	0 (0.0%)
White	217 (75.6%)
Unknown race	26 (9.9%)
Ethnicity	
Spanish origin	37 (12.9%)
Not Hispanic or Latino	250 (87.1%)
Income of the household (annual)	
Less than \$19,999	11 (3.8%)
\$20,000-\$37,999	17 (5.9%)
\$38,000-\$44,999	8 (2.8%)
\$45,000-\$54,999	7 (2.4%)
\$55,000-\$64,999	12 (4.2%)
\$65,000-\$74,999	20 (7.0%)
\$75,000-\$99,999	32 (11.2%)
\$100,000 or more	102 (35.5%)
Unknown	78 (27.2%)
Level of education	
< Highschool Diploma	101 (35.2%)
Highschool Diploma or Equivalent	51 (17.8%)
Associates Degree	33 (11.5%)
Bachelors Degree	71 (24.7%)
Masters Degree	29 (10.1%)
Doctoral Degree	2 (0.7%)

**Of note, the race does not correspond to the total number of patients as some patients with mixed races were included in the analysis.*

Slope	0.97 95% CI = [0.96, 0.99]
Intercept	0.01 mm 95% CI = [-0.02, 0.05]*
Bias at 0.00 mm	0.01 mm 95% CI = [-0.03, 0.05]*
Bias at 3.00 mm	-2.2% 95% CI = [-3.1, -1.5]
Bias at 5.00 mm	-2.4% 95% CI = [-3.3, -1.4]
Bias at 7.00 mm	-2.4% 95% CI = [-3.5, -1.3]

*Of note, the difference between the two 95% CI is due to the fact that the bootstrap is used for bias CI calculation, whereas for the intercept and slope it is the standard CI calculation linked to Passing-Bablok regression that is used.

Overjet – 2D Monitoring

A total of 208 patients rendering 245 results were included in the analysis. One patient could render multiple results corresponding to both central incisor couples.

Characteristic	# (%)
Gender	
Male	69 (33.2%)
Female	139 (66.8%)
Age group	
[6; 12] years of age	34 (16.3%)
]12; 22[years of age	70 (33.7%)
≥ 22 years of age	104 (50.0%)
Race*	
American Indian or Alaska Native	9 (4.3%)
Asian	8 (3.8%)
Black or African American	23 (11.1%)
Native Hawaiian or Other Pacific Islander	0 (0.0%)
White	159 (76.5%)
Unknown race	16 (7.7%)
Ethnicity	
Spanish origin	32 (15.4%)
Not Hispanic or Latino	176 (84.6%)
Income of the household (annual)	
Less than \$19,999	10 (4.8%)
\$20,000-\$37,999	12 (5.8%)
\$38,000-\$44,999	6 (2.9%)
\$45,000-\$54,999	7 (3.4%)
\$55,000-\$64,999	7 (3.4%)
\$65,000-\$74,999	11 (5.2%)
\$75,000-\$99,999	21 (10.1%)
\$100,000 or more	77 (37.0%)
Unknown	57 (27.4%)
Level of education	
< Highschool Diploma	87 (41.8%)
Highschool Diploma or Equivalent	35 (16.8%)
Associates Degree	20 (9.6%)
Bachelors Degree	41 (19.8%)
Masters Degree	21 (10.1%)
Doctoral Degree	4 (1.9%)

**Of note, the race does not correspond to the total number of patients as some patients with mixed races were included in the analysis.*

Slope	0.84 95% CI = [0.78, 0.89]
Intercept	-0.3 mm 95% CI = [0.1, 0.4]*
Bias at 0.0 mm	-0.3 mm 95% CI = [0.1, 0.5]*
Bias at 3.0 mm	-7.0% 95% CI = [-11.5 -3.5]
Bias at 5.0 mm	-11.2% 95% CI = [-15.6, -7.1]
Bias at 7.0 mm	-13.0% 95% CI = [-18.2, -8.3]
Bias at 9.0 mm	-14.1% 95% CI = [-19.8, -8.8]

*Of note, the difference between the two 95% CI is due to the fact that the bootstrap is used for bias CI calculation, whereas for the intercept and slope it is the standard CI calculation linked to Passing-Bablok regression that is used.

Overjet – 3D Monitoring

A total of 263 patients rendering 292 results were included in the analysis. One patient could render multiple results corresponding to both central incisor couples.

Characteristic	# (%)
Gender	
Male	83 (31.6%)
Female	180 (68.4%)
Age group	
[6; 12] years of age	48 (18.3%)
]12; 22[years of age	80 (30.4%)
≥ 22 years of age	135 (51.3%)
Race*	
American Indian or Alaska Native	10 (3.8%)
Asian	9 (3.4%)
Black or African American	29 (11.0%)
Native Hawaiian or Other Pacific Islander	0 (0.0%)
White	202 (77.2%)
Unknown race	17 (6.5%)
Ethnicity	
Spanish origin	36 (13.7%)
Not Hispanic or Latino	227 (86.3%)
Income of the household (annual)	
Less than \$19,999	11 (4.2%)
\$20,000-\$37,999	15 (5.7%)
\$38,000-\$44,999	7 (2.7%)
\$45,000-\$54,999	7 (2.7%)
\$55,000-\$64,999	12 (4.5%)
\$65,000-\$74,999	17 (6.5%)
\$75,000-\$99,999	25 (9.5%)
\$100,000 or more	90 (34.2%)
Unknown	79 (30.0%)
Level of education	
< Highschool Diploma	100 (38.0%)
Highschool Diploma or Equivalent	45 (17.1%)
Associates Degree	28 (10.6%)
Bachelors Degree	61 (23.2%)
Masters Degree	24 (9.2%)
Doctoral Degree	5 (1.9%)

**Of note, the race does not correspond to the total number of patients as some patients with mixed races were included in the analysis.*

Slope	1.03 [1.01, 1.05]
Intercept	0.14 mm [0.09, 0.19]*
Bias at 0.00 mm	0.14 mm [0.07, 0.23]*
Bias at 3.00 mm	7.2% [6.0, 8.9]
Bias at 5.00 mm	5.4% [4.5, 6.7]
Bias at 7.00 mm	4.7% [3.7, 6.0]
Bias at 9.00 mm	4.3% [3.2, 5.6]

*Of note, the difference between the two 95% CI is due to the fact that the bootstrap is used for bias CI calculation, whereas for the intercept and slope it is the standard CI calculation linked to Passing-Bablok regression that is used.

Archwire and auxiliaries study

DentalMonitoring evaluated the passive archwire and auxiliaries indication using 3D Models acquired with intraoral scanners as input data to the Reference Method. The study was performed using data collected prospectively. The study involved six sites located in the United States: five sites for patient enrollment and one site for generation of the Reference Method results.

The Reference Method results were generated by performing a best fit on the acquired 3D Models. The best fit was performed per arch and per patient between the 3D Models acquired at two different timepoints. The best fits were done using a CAD/CAM software.

Data was collected in order to qualify the patient demographics.

Passive archwire and auxiliaries – 2D Monitoring

Characteristic	# (%)
Gender	
Female	172 (63%)
Male	101 (37%)
Age group	
[6; 12] years of age	24 (9%)
]12; 22[years of age	197 (72%)
≥ 22 years of age	52 (19%)
Race*	
American Indian or Alaska Native	8 (3%)
Asian	11 (4%)
Black or African American	48 (18%)
Native Hawaiian or Other Pacific Islander	1 (0.3%)
White	190 (70%)
Refused to disclose	31 (11%)
Ethnicity	
Spanish origin	64 (23%)
Not Hispanic or Latino	209 (77%)
Income of the household (annual)	
Less than \$19,999	16 (6%)
\$20,000-\$37,999	17 (6%)
\$38,000-\$44,999	16 (6%)
\$45,000-\$54,999	16 (6%)
\$55,000-\$64,999	13 (5%)
\$65,000-\$74,999	10 (4%)
\$75,000-\$99,999	31 (11%)
\$100,000 or more	76 (28%)
Refused to disclose	78 (28%)
Level of education	
< Highschool Diploma	175 (64%)
Highschool Diploma or Equivalent	31 (11%)
Associates Degree	18 (7%)
Bachelors Degree	32 (12%)
Masters Degree	11 (4%)
Doctoral Degree	5 (2%)
Not collected	1 (0%)

**Of note, the race does not correspond to the total number of patients as some patients with mixed races were included in the analysis.*

		Reference Method		
		Passive	Active	TOTAL
Candidate Method	Positive class: Passive	357	63	420
	Negative class: Active	43	267	310
	TOTAL	400	330	730

	Result	95% CI Lower Bound	95% CI Upper Bound
Sensitivity	89.0%	84.9%	92.1%
Specificity	80.4%	75.1%	84.8%

Passive archwire and auxiliaries – 3D Monitoring

Characteristic	# (%)
Gender	
Female	166 (62%)
Male	103 (38%)
Age group	
[6; 12] years of age	27 (10%)
]12; 22[years of age	196 (73%)
≥ 22 years of age	46 (17%)
Race*	
American Indian or Alaska Native	9 (3%)
Asian	11 (4%)
Black or African American	43 (16%)
Native Hawaiian or Other Pacific Islander	1 (0.4%)
White	189 (70%)
Refused to disclose	31 (12%)
Ethnicity	
Spanish origin	64 (24%)
Not Hispanic or Latino	209 (76%)
Income of the household (annual)	
Less than \$19,999	13 (5%)
\$20,000-\$37,999	14 (5%)
\$38,000-\$44,999	12 (4%)
\$45,000-\$54,999	13 (5%)
\$55,000-\$64,999	15 (6%)
\$65,000-\$74,999	9 (3%)
\$75,000-\$99,999	34 (13%)
\$100,000 or more	81 (30%)
Refused to disclose	78 (29%)
Level of education	
< Highschool Diploma	174 (65%)
Highschool Diploma or Equivalent	28 (10%)
Associates Degree	18 (7%)
Bachelors Degree	30 (12%)
Masters Degree	12 (4%)
Doctoral Degree	4 (1%)
Not collected	3 (1%)

**Of note, the race does not correspond to the total number of patients as some patients with mixed races were included in the analysis.*

		Reference Method		
		Passive	Active	TOTAL
Candidate Method	Positive class: Passive	361	48	409
	Negative class: Active	39	282	321
	TOTAL	400	330	730

	Result	95% CI Lower Bound	95% CI Upper Bound
Sensitivity	90.4%	86.7%	93.2%
Specificity	85.5%	80.8%	89.2%

Updated 3D Model study

DentalMonitoring evaluated the Updated 3D Model indication using 3D Models acquired with intraoral scanners as the Reference Method. For each case, they compared the 3D Model generated by Dental Monitoring to the baseline 3D Model using a best fit between the two 3D objects. Each best fit renders a deviation value and this value is then used to quantify the absolute difference between the two 3D objects, which was used to calculate the mean absolute error (MAE). The study was performed using data collected prospectively. The study involved seven sites located in the United States: six sites for patient enrollment and one site for generation of the study results.

The study results were generated by performing a best fit between the acquired 3D Models and the 3D Model generated by DentalMonitoring, *i.e.* Updated 3D Model. The best fit was performed per arch and per patient. The best fits were done using a CAD/CAM software.

Data was collected in order to qualify the patient demographics.

Characteristic	# (%)
Gender	
Female	80 (32.0%)
Male	170 (68.0%)
Age group	
]12; 22[years of age	114 (45.6%)
≥ 22 years of age	136 (54.4%)
Race*	
American Indian or Alaska Native	14 (5.6%)
Asian	8 (3.2%)
Black or African American	12 (4.8%)
Native Hawaiian or Other Pacific Islander	0 (0.0%)
White	221 (88.4%)
Refused to disclose	4 (1.6%)
Ethnicity	
Spanish origin	22 (8.8%)
Not Hispanic or Latino	226 (90.4%)
Unknown	2 (0.8%)
Income of the household (annual)	
Less than \$19,999	9 (3.6%)

\$20,000-\$37,999	18 (7.2%)
\$38,000-\$44,999	7 (2.8%)
\$45,000-\$54,999	12 (4.8%)
\$55,000-\$64,999	12 (4.8%)
\$65,000-\$74,999	13 (5.2%)
\$75,000-\$99,999	32 (12.8%)
\$100,000 or more	81 (32.4%)
Refused to disclose	66 (26.4%)
Level of education	
< Highschool Diploma	106 (42.1%)
Highschool Diploma or Equivalent	34 (13.5%)
Associates Degree	29 (11.6%)
Bachelors Degree	53 (21.0%)
Masters Degree	24 (9.5%)
Doctoral Degree	5 (2.0%)
Unknown	1 (0.4%)

**Of note, the race does not correspond to the total number of patients as some patients with mixed races were included in the analysis.*

# of patients	# of results	Mean Absolute Error (MAE)	95% CI
250	536	0.10	[0.093; 0.103]

Human Factors Testing

A Human factors validation testing was performed to demonstrate the usability of the device. Considering DentalMonitoring has two external user-facing interfaces, *i.e.* the Dashboard and the DM App, one study was performed for each of these interfaces.

Dashboard study

The Dashboard study enrolled two user groups:

- doctors; and
- practice employees.

Doctors represented 17 participants while practice employees represented 16 participants.

Testing took place in the United States in three cities, each located in different states.

The testing shows that the Dashboard can be used safely and effectively by the user population. Most of the users used the device properly and there is no significative difference between the different groups of population. Even if some use errors and use difficulties were observed, they cannot cause any harm to the users based on the performed analysis of the root cause. Furthermore, in the Dashboard, no tasks are considered as critical.

DM App study

The DM App study was divided into two parts: validation of the healthcare professional-facing interface

which offers some of the features of the Dashboard, and validation of the patient-facing interface.

The DM App healthcare professional-facing interface study enrolled one user group constituted of doctors and practice employees. A total of 17 doctors along with 16 practice employees composed a testing group of 33 participants.

Testing took place in the United States in three cities, each located in different states.

The testing shows that the DM App healthcare professional-facing interface can be used safely and effectively by the user population. Most of the users used the device properly and there is no significant difference between the different groups of population. Furthermore, even if some use errors and use difficulties were observed, they cannot cause any harm to the users based on the performed analysis of the root cause.

The DM App patient-facing interface study enrolled five user groups:

- adults 22 years of age or older;
- adolescents between 13 and 21 years old;
- children: pairs of pediatric patients (6 to 12 years of age) and lay caregivers (22 years of age or older);
- adults with disabilities: pairs of adult patients with disabilities who cannot independently use the product (22 years of age or older) and lay caregivers (22 years of age or older); and
- healthcare professionals (includes doctors and practice employees).

Population group	adults	adolescents	children	adults with disabilities	healthcare professionals
# of participants	16	15	15	17	17

Testing took place in the United States in five cities, each located in different states. This study included use of the DM Cheek Retractor and DM ScanBox which are mandatory hardware products to be used with the DM App in order to appropriately acquire Scans.

The testing shows that the DM ScanBox, the DM Cheek Retractor and the DM App, can be used safely and effectively by the user population. Most of the users used the device properly and there is no significant difference between the different groups of population. Furthermore, some use errors and use difficulties were observed; however, they are not expected to cause any harm to the users based on an analysis of the root cause that was conducted. Users were able to execute the relevant tasks directly or in workarounds within the patient profiles. The task errors identified were found to be non-critical and the testing was able to demonstrate that the device can be adequately used by the health care professional and patient according to the instructions for use.

LABELING

Labeling has been included. It comprises a user manual dedicated to healthcare professionals on one hand and a user manual dedicated to patients on the other hand.

Labeling also includes the two distinct labels embedded in the Dashboard, and in the DM App.

RISKS TO HEALTH

The table below identifies the risks to health that may be associated with use of and the measures necessary to mitigate these risks.

Identified Risk	Potential Mitigation Measure
Adverse tissue reaction	Biocompatibility evaluation
Use error/ improper device use leading to incorrect oral health information conveyed to healthcare professional	Labeling Usability testing
Software malfunction leading to inaccurate patient monitoring and diagnosis	Software verification, validation, and hazard analysis,
Software failure to identify or monitor the correct oral health condition leading to delayed treatment	Clinical validation Software verification, validation, and hazard analysis
Device failure to adequately capture image leading to incorrect identification or monitoring of oral health condition	Non-clinical performance testing Technological specifications

SPECIAL CONTROLS

In combination with the general controls of the FD&C Act, the Dental Image Analyzer is subject to the following special controls:

- (1) The patient-contacting components of the device must be demonstrated to be biocompatible.
- (2) Non-clinical performance testing data must demonstrate that the device performs as intended under anticipated conditions of use and must include full specifications of the hardware requirements and testing to demonstrate the specified hardware ensures adequate data for validated and accurate measurements;
- (3) Clinical performance data must demonstrate the accuracy and precision of the diagnostic and monitoring device algorithms to perform as intended under anticipated conditions of use.
- (4) Usability testing must demonstrate that the user can correctly use the device, based solely on reading the directions for use.
- (5) Software verification, validation, and hazard analysis must be performed.
- (6) Labeling must include:
 - (i) Information on the patient population for which the device has been demonstrated to be effective.
 - (ii) Information on how the device operates during the typical course of treatment
 - (iii) A detailed summary of the device technical parameters, including compatible operating systems, hardware, and/or accessories.
 - (iv) Instructions for cleaning of any reusable components.
 - (v) Warning that the device is not intended to be used independently for diagnosis and that the device does not replace clinical decision making.
- (7) Patient labeling must be provided and must include:
 - (i) Relevant contraindications, warnings, precautions, adverse effects/complications, and when to seek help from a dental healthcare professional.
 - (ii) Information on how the device operates during the typical course of treatment.
 - (iii) A detailed summary of the device technical parameters, including compatible operating systems, hardware, and/or accessories.
 - (iv) Information on the patient population for which there is clinical evidence of effectiveness.
 - (v) Instructions for cleaning of any reusable components.

BENEFIT-RISK DETERMINATION

The risks of the device are based on data collected in a clinical studies described above. Both the clinical and usability risks of the device have been evaluated and use of the device itself presents no significant direct risks to the user. The key clinical risk of this proposed device are the inability to identify or monitor the correct oral health condition leading to delayed treatment. The risks were quantified by sensitivity and specificity in the clinical study, which demonstrated the device's function. The risk of the proposed device is low.

The probable benefits of the device are also based data collected in a clinical studies as described above. This device can be a benefit to the clinician to monitor orthodontic progress between scheduled appointments and facilitate additional interaction between patient and clinician, as needed. Additionally, the device can provide benefit by specifically identifying potential clinical scenarios and areas of concern that would require further evaluation/intervention. The device is not intended to replace regularly scheduled appointments and would be considered low risk, as it ultimately facilitates more interaction between the patient and clinician during treatment.

PATIENT PERSPECTIVES

This submission did not include specific information on patient perspectives for this device.

BENEFIT/RISK CONCLUSION

In conclusion, given the available information above, for the following indication statement:

DentalMonitoring is a medical device software using image processing algorithms to analyze pictures of the oral cavity (hereinafter Scans). Scans are taken using the DM App, a smartphone, and the manufacturer's proprietary hardware products. Scans are taken by the patient, a non-healthcare professional, or a healthcare professional. The Scan is taken in healthcare facilities, such as a dental practice, or in a non-healthcare environment, such as the patient's own home. For some clinical parameters, DentalMonitoring requires a 3D Model.

The product is designed to assist healthcare professionals in remotely monitoring orthodontic treatments and treatment progress. The results of DentalMonitoring are intended to be used as an aid in diagnosis and monitoring, not on a stand-alone basis for clinical decision-making.

DentalMonitoring is indicated for use for patients over the age of 6 and reports results solely on permanent teeth.

DentalMonitoring can monitor the following clinical parameters:

- oral hygiene: dental plaque / food residue;
- soft tissue statement: gingival recession, black triangle;
- dental statement: closure of extraction space, tooth wear;
- alignment: closure of all anterior spaces; and
- dental occlusion:
 - in 2D Monitoring: midline deviation, overbite/open bite, overjet
 - in 3D Monitoring: canine class, midline deviation, overbite/open bite, overjet

Additionally, the following clinical parameters specific to orthodontic treatment types or phases can be monitored using DentalMonitoring:

- for aligner treatments: tracking (seat/unseat), attachment loss, button loss;
- for braces: bracket debonding, tie loss, self-ligating clips, passive archwire and auxiliaries; and
- for thermoformed retainers: tracking (seat/unseat).

Based on an initial 3D Model provided by a healthcare professional, DentalMonitoring can also provide healthcare professionals with 3D Models representative of the patient's dentition and treatment progress. This device is a prescription device and is not intended for over-the-counter use.

The probable benefits outweigh the probable risks for the DentalMonitoring. The device provides benefits and the risks can be mitigated by the use of general and the identified special controls.

CONCLUSION

The De Novo for the DentalMonitoring is granted and the device is classified as follows:

Product Code: SBC

Device Type: Dental Image Analyzer

Regulation Number: 21 CFR 872.1770

Class: Class II