

Surgical Gowns Manufacturing Basics

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- Surgical vs. Non-surgical Gowns
- Gown Level Classifications
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Surgical vs. Non-surgical Gowns

- A number of different terms used: surgical gowns, isolation gowns, surgical isolation gowns, non-surgical gowns, cover gowns, comfort gowns, procedural gowns, and operating room gowns.



Cardinal Level 4 Surgical Gown



Halyard Procedure Gown



Medline Isolation Gown

Surgical vs. Non-surgical Gowns

- ANSI/AAMI PB70 definition of “**surgical gowns**” - “devices that are intended to be worn by operating room personnel during surgical procedures to protect both the surgical patient and the operating room personnel from the transfer of *microorganisms, body fluids, and particulate matter [material]*”
- FDA issued a guidance document “Premarket Notification Requirements Concerning Gowns Intended for Use in Health Care Settings” in 2015, basically defined **Level 1 and Level 2 can no longer be called “surgical gowns”**, and **only level 3 and level 4 gowns can be called “surgical gowns”**, including “surgical isolation gowns”.
- Choosing which gown to use:

<https://www.cdc.gov/HAI/pdfs/ppe/PPEslides6-29-04.pdf>

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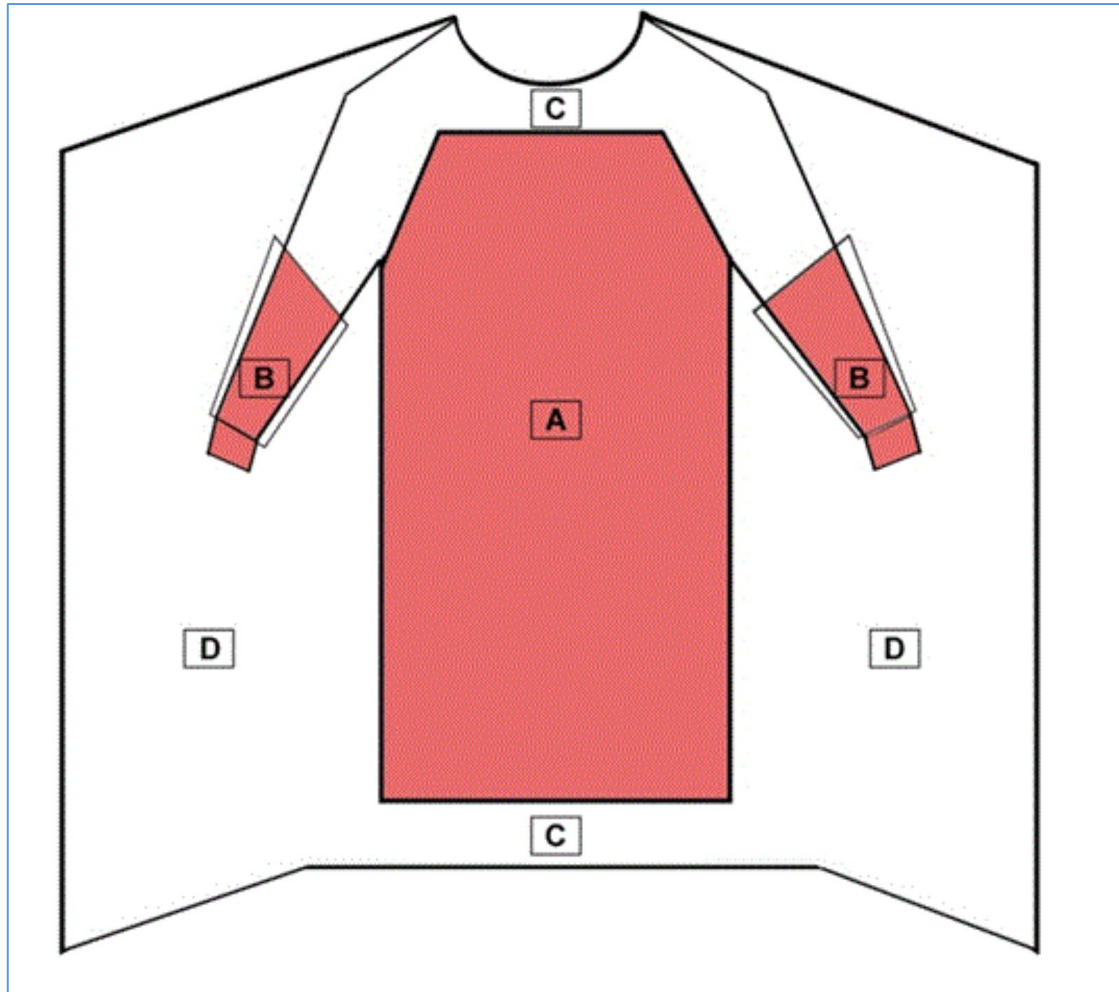
- Surgical vs. Non-surgical Gowns
- **Gown Level Classifications**
- Gown Designs
- Gown Materials
- Manufacturing Process
- Standards and Testing
- Regulatory Path

Gown Level Classifications

ANSI/AAMI PB70 divides **barrier performance** into 4 levels.

- **Level 1:** is used for **Minimal** Risk of exposure situations, *such as providing basic care and cover gowns for visitors.*
- **Level 2:** is used for **Low** Risk of exposure situations, *such as during common blood drawing procedures and suturing.*
- **Level 3:** is used for **Moderate** Risk of exposure situations, *such as surgical procedures and inserting an intravenous (IV) line.*
- **Level 4:** is used for **High** Risk of exposure situations, *such as during long, fluid intense surgical procedures.*

“Critical Zones” of a Surgical Gown



ANSI/AAMI PB70:2012

- **Area A&B – Critical Zone**

The classification is based on the **lower performing component** of the two areas A&B.

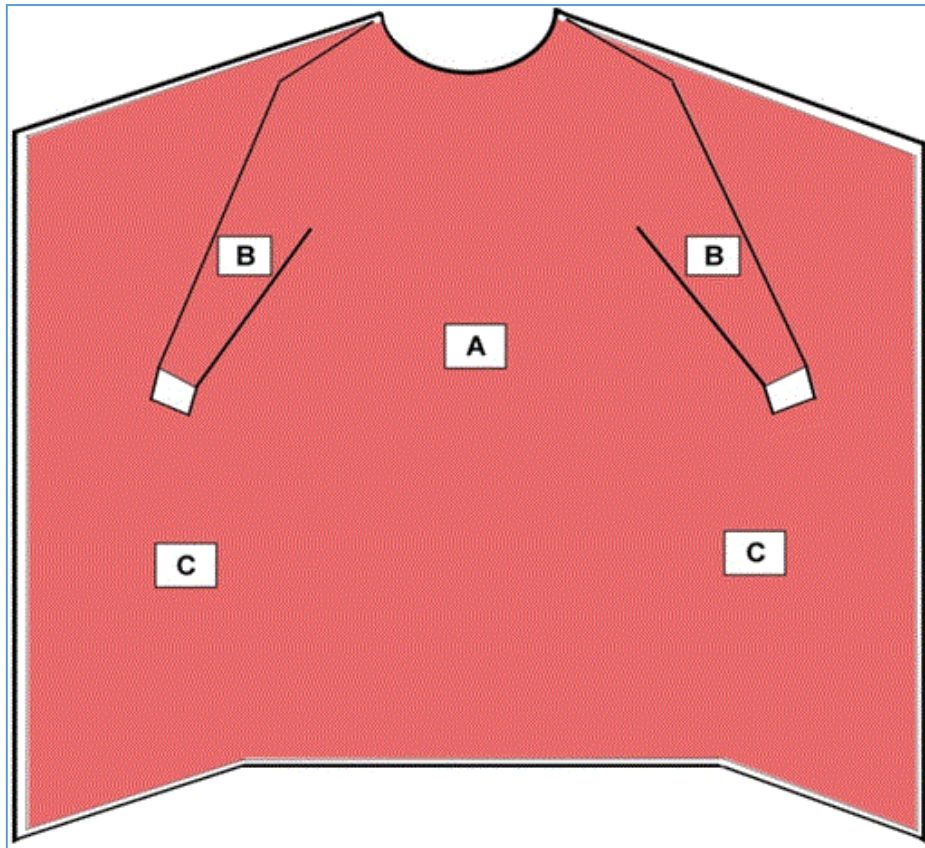
- **Area C – Non-critical Zone**

It is required to meet **minimum of level 1** barrier performance.

- **Area D – Non-protective zone**

It can be non-protective.

“Critical Zones” of a Surgical Isolation Gown and a Non-surgical Gown



ANSI/AAMI PB70:2012

Area A, B, C – Critical zone

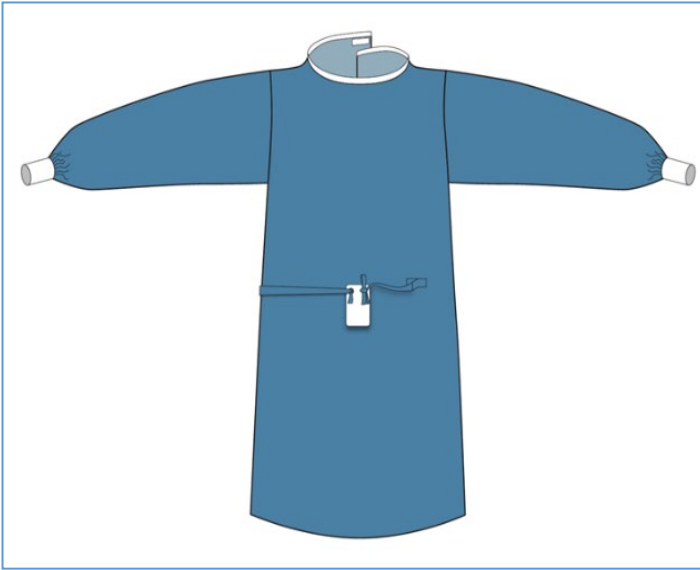
The entire gown is the "critical zone".

Surgical isolation gowns are used when there is a medium to high risk of contamination and **need for larger critical zones** than traditional surgical gowns.

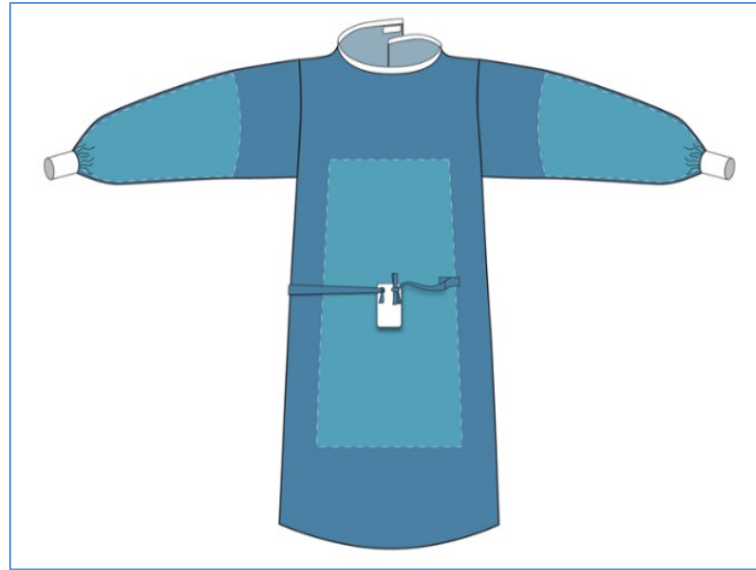
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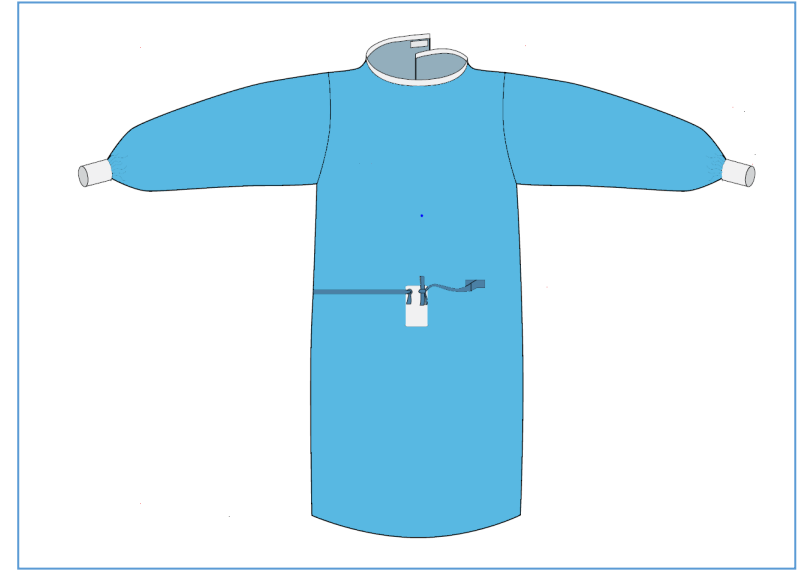
Surgical Gown Overall Designs



Invenio Level 3 Non-Reinforced
Surgical Gown (K162442)



Invenio Level 4 Film-Reinforced
Surgical Gown (K163191)



Invenio Level 4 Breathable
Surgical Gown (K172445)

Surgical Gown Overall Designs



Medline Level 3 Non-Reinforced Surgical Gown



Halyard Level 4 Ultra Film-Reinforced Surgical Gown



Cardinal Health Smart Level 4 Breathable Surgical Gown

Surgical Gown Accessory Designs



Neck Binder – neck length adjustable with Velcro at back



Knitted cuff – interface with gloves, fit and comfort



Cool Back Panel – use light SMS for ventilation and cost deduction



Tie patch design – without compromising the material integrity



Copyright@ invenio

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Surgical Gown Materials



Delta-medi **Spunlace** Surgical Gown



Medline **SMS** Non-Reinforced Surgical Gown



Halyard Ultra **Poly Film Laminate** Surgical Gown



Cardinal **Breathable Tri-laminate** Smart Surgical Gown

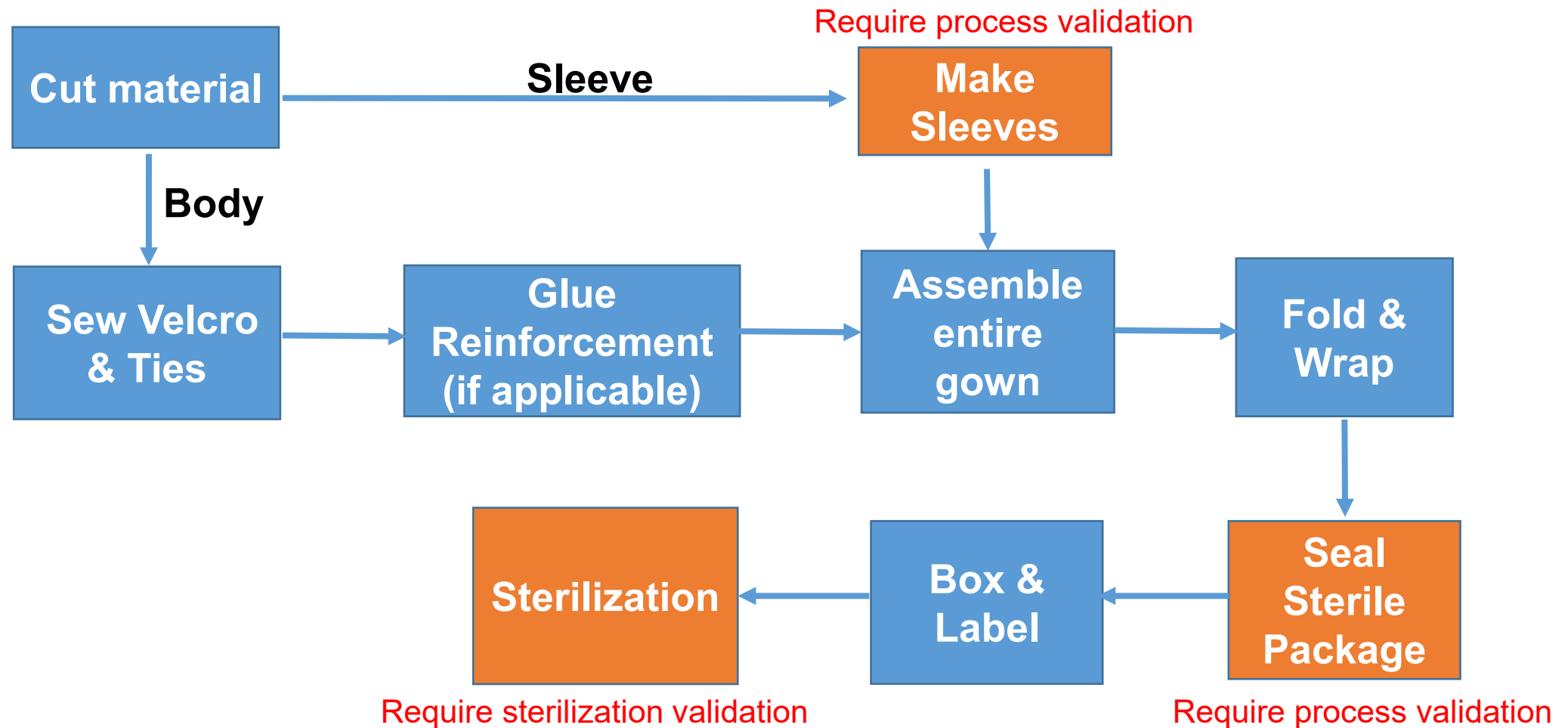


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Manufacturing Process Flow Chart

Manufacturing environment: Clean room



Process Validation

IQ

Installation Qualification

- Equipment installed correctly?
- Can it produce my product?

OQ

Operational Qualification

- Input & Output relationship?
- Operational range?
- Check output (testing) at **high, low** and **nominal** settings

PQ

Performance Qualification

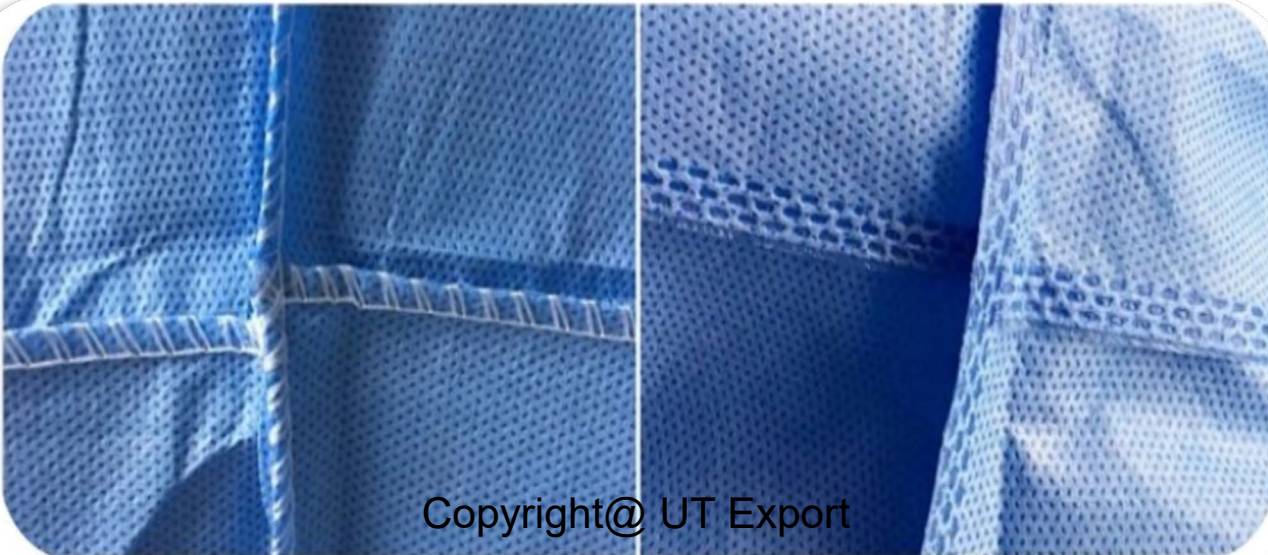
- Run at least 3 lots under nominal setting and test product performance
- To ensure the consistency of the process

Seam Types

Stitched Seam

Ultrasonic welding Seam

Heat Seal Seam



Used in non-protective
zones

Used in non-critical &
non-protective zones

Used in critical zones
(sleeve seams)

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Barrier Performance ANSI/AAMI PB70:2012

Sampling requirement: $AQL=4\%$, $\alpha=0.05$, $RQL=20\%$, $\beta=0.10$

Level 1 AATCC 42: Impact Penetration $\leq 4.5\text{gm}$ (IPR)

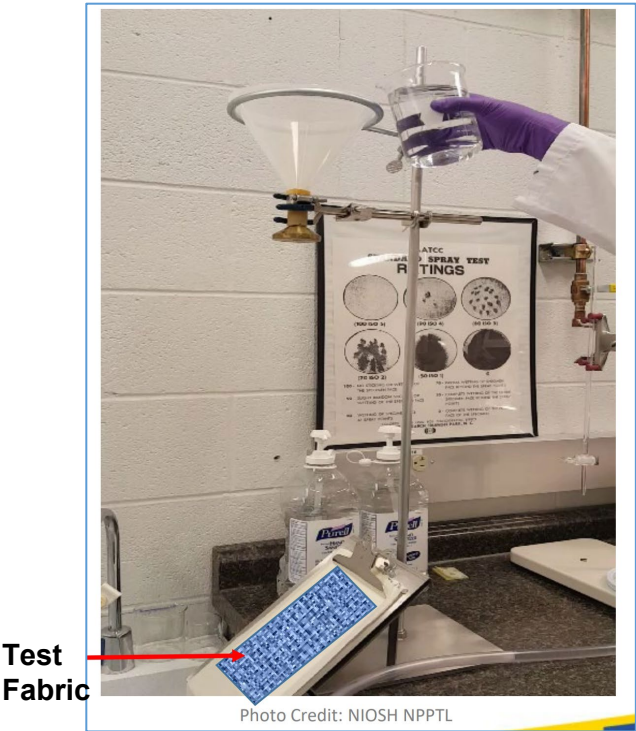
Level 2 AATCC 42: Impact Penetration $\leq 1.0\text{gm}$ (IPR)

AATCC 127: Hydrostatic Pressure $\geq 20\text{cm}$ (Hydrohead)

Level 3 AATCC 42: Impact Penetration $\leq 1.0\text{gm}$ (IPR)

AATCC 127: Hydrostatic Pressure $\geq 50\text{cm}$ (Hydrohead)

Level 4 ASTM F 1671 Viral Penetration: PASS



AATCC 42 Impact Penetration



AATCC 127 Hydrohead



ASTM 1670 Blood Penetration & ASTM 1671 Viral Penetration

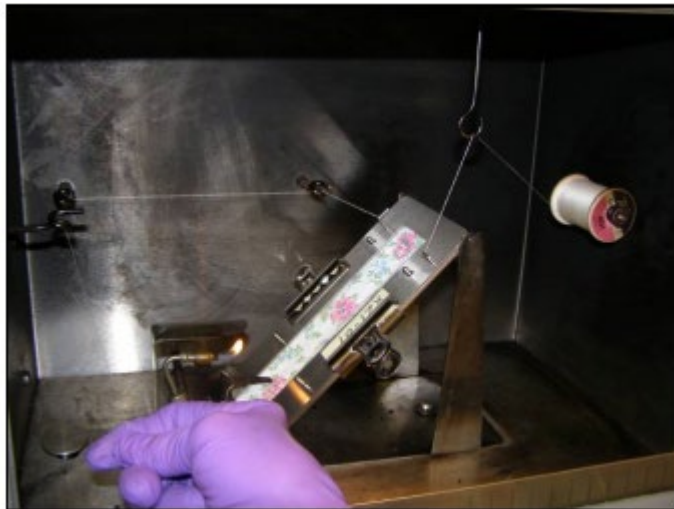
Other Required Testing

ISO 10993-1 Biocompatibility

- Cytotoxicity
- Irritation
- Sensitization

Flammability (16CFR Part 1610)

- Meet class 1 requirement



16CFR Part 1610 Test Manual

Device Categories			Biological Effect							
Device Type	Body Contact	CONTACT DURATION	Cytotoxicity	Sensitization	Irritation or Intracutaneous Reactivity	System(Acute) Toxicity	Subchronic Toxicity	Genotoxicity	Implantation	Hemocompatibility
Surface Devices	Skin	Limited	X	X	X	-	-	-	-	-
		Prolonged	X	X	X	-	-	-	-	-
		Permanent	X	X	X	-	-	-	-	-
	Mucosal Membrane	Limited	X	X	X	-	-	-	-	-
		Prolonged	X	X	X	0	0	-	0	-
		Permanent	X	X	X	0	X	X	0	-
	Breached or Compromised Surfaces	Limited	X	X	X	0	-	-	-	-
		Prolonged	X	X	X	0	0	-	0	-
		Permanent	X	X	X	0	X	X	0	-
External Communicating Devices	Blood Path, Indirect	Limited	X	X	X	X	-	-	-	X
		Prolonged	X	X	X	X	0	-	-	X
		Permanent	X	X	0	X	X	X	0	X
	Tissue/Bone/Dentin Communicating†	Limited	X	X	X	0	-	-	-	-
		Prolonged	X	X	0	0	0	X	X	-
		Permanent	X	X	0	0	0	X	X	-
	Circulating Blood	Limited	X	X	X	X	-	0‡	-	X
		Prolonged	X	X	X	X	0	X	0	X
		Permanent	X	X	X	X	X	X	0	X
Implant Devices	Tissue/Bone	Limited	X	X	X	0	-	-	-	-
		Prolonged	X	X	0	0	0	X	X	-
		Permanent	X	X	0	0	0	X	X	-
	Blood	Limited	X	X	X	X	-	-	X	X
		Prolonged	X	X	X	X	0	X	X	X
		Permanent	X	X	X	X	X	X	X	X

X = ISO 10993-1 tests

0 = Additional tests that may be applicable

† = Tissue includes tissue fluids and subcutaneous spaces

‡ = For all devices used in extracorporeal circuits

Other Non-essential Testing

Strength Requirements

- Grab Tensile (dry & wet)
- Trapezoid Tear (dry & wet)
- Bursting Strength (dry & wet)
- Seam Strength

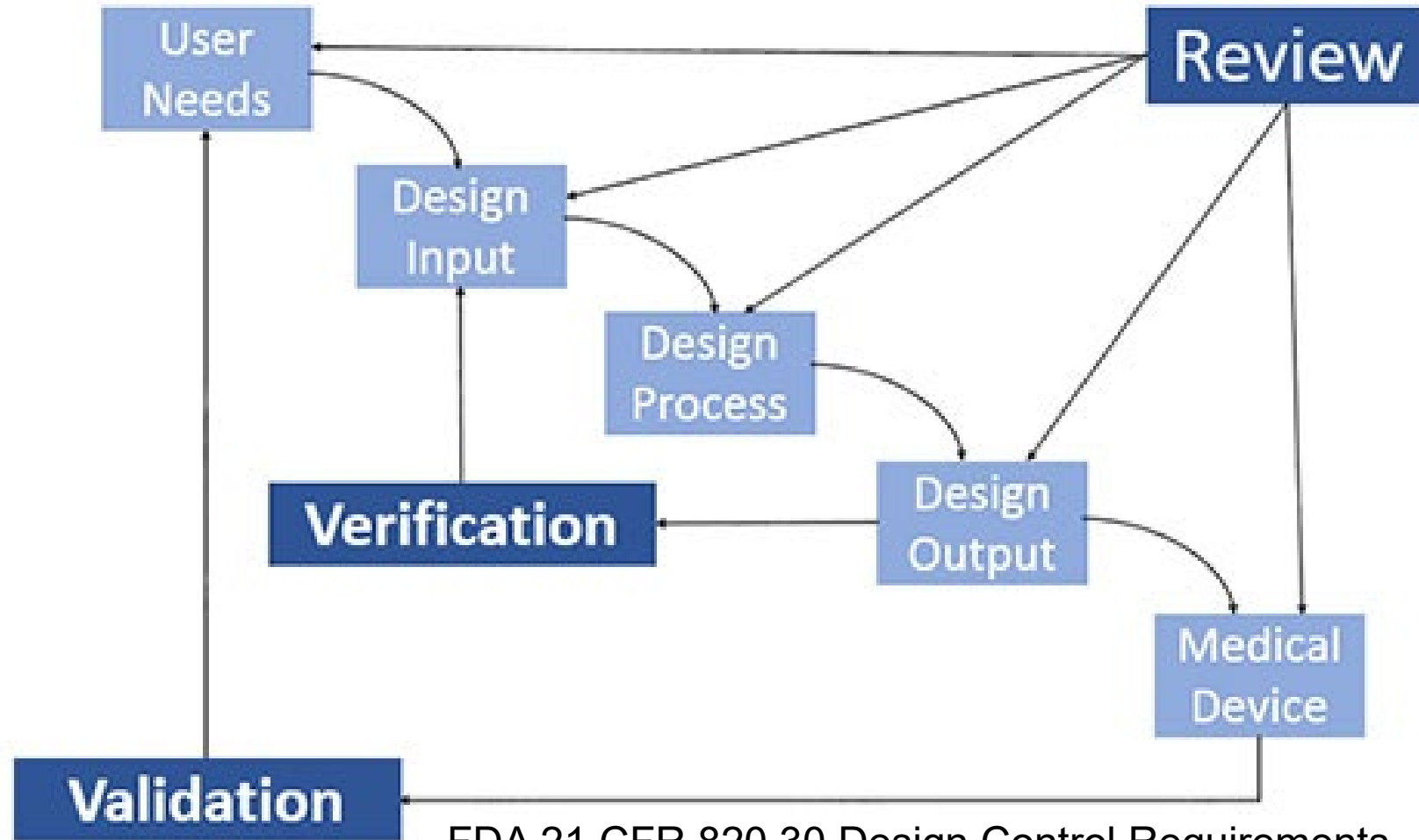
Others

- Linting
- Water Vapor Transmission
- European Standard: EN13795

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Design Control



FDA 21 CFR 820.30 Design Control Requirements

Design Control

- 21 CFR 820.30, Design Controls Elements:
 - ❑ Design Planning (*Start date, budget e.tc*)
 - ❑ Design Input (*Marketing & Engineering specs*)
 - ❑ Risk Analysis (*DFMEA and PFMEA, living documents*)
 - ❑ Design Output /DMR (*specs, tooling, BOMs, SOPs, DHR formats...*)
 - ❑ Design Changes (*material, process, supplier change e.tc*)
 - ❑ Design Reviews – *including an independent reviewer*
 - ❑ Design Verification (*design input = design output, inspection/testing*)
 - ❑ Design Validation [*Product, Equipment (DQ, IQ, OQ, PQ), software*]
 - ❑ Design Transfer (*from PD to manufacturing, Engineering run, Trial run*)
 - ❑ Design History File (*documentation to demonstrate the above*)

510(k) Submission

- Surgical gowns are **Class II medical devices** - require 510(k) clearance.
- A 510(k) is a premarket submission made to FDA to demonstrate that the device to be marketed is at least **as safe and effective**, that is, **substantially equivalent**, to a legally marketed device (21 CFR 807.92(a)(3)) that is not subject to PMA.
- Guidance document FDA 510(k) Program: <https://www.fda.gov/media/82395/download>
- First priority is to **find predicate devices**: <https://www.fda.gov/medical-devices/premarket-notification-510k/how-find-and-effectively-use-predicate-devices>
- If you have a novel design and there is no predicate available, consider **the De Novo Process**. <https://www.fda.gov/medical-devices/premarket-submissions/de-novo-classification-request>

Other Resources

- FDA Guidance On Medical Gowns: <https://www.fda.gov/medical-devices/personal-protective-equipment-infection-control/medical-gowns>
- FDA Process Validation: <https://www.fda.gov/media/94074/download>
- FDA Design Control: <https://www.fda.gov/media/116762/download>
- Available databases: 510k(s), Total Product Life Cycle (TPLC)
<https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfPCD/classification.cfm>
- PPE Donning (Put on)
<https://www.youtube.com/watch?v=Ca66dpjPWZc>
- PPE Doffing (Take off)
<https://www.youtube.com/watch?v=bZA424c5sWQ>

Questions?

If there are any further questions which we were not able to cover today, please feel free to contact us:

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