Efficient Use of Premarket Data Sets to Meet Both FDA and CMS Requirements

CSRC and MDEpiNet Thinktank Meeting:
"The Role of Endpoint Adjudication in Medical Device Clinical Trials"

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When would endpoint adjudication be helpful?

- Adjudication is especially helpful in the following situations:
  - Studies with complex and/or subjective endpoints
  - Removes appearance of sponsor biasing data
  - Studies which cannot be blinded
  - Reduces global variation in outcome reporting

- Primary endpoints are typically adjudicated by an independent CEC in premarket studies done by industry

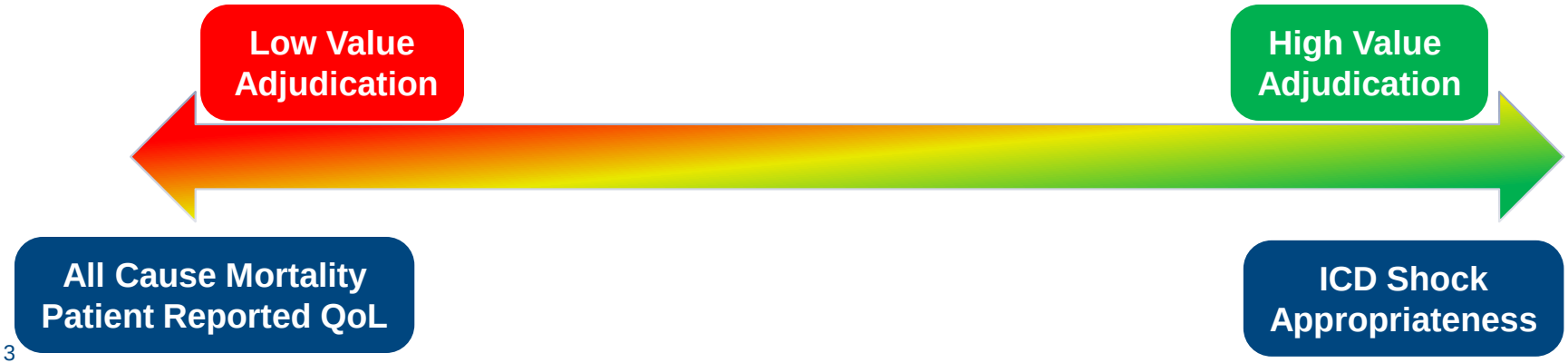
Industry Related Example and Discussion

Example where CEC adjudication resulted in changes:

- Data from recent BSC studies:
  - **10% rate** of CEC changing Site reported CV death to Non-CV death
  - **6% rate** of CEC change from Site reported Non-CV death to CV death

Discussion Point:

- Endpoint type is a critical variable to justify the need for adjudication



CMS and FDA Approval Process: Latest Experience

WATCHMAN Left Atrial Appendage Closure:

- FDA Approval: March 13th, 2015
- CMS National Coverage Decision: Feb 8th, 2016
  - Eleven Months between FDA approval and CMS Coverage Decision
  - Initial differences between the FDA approved label and CMS approved NCD populations

Engagement with CMS and FDA: State of the Art

Payer Communication Task Force (PCTF)

- Parallel Review Process - FDA and CMS
  - *Directly from the FDA webpage…"early engagement between device manufacturers, CDRH, and Payers will allow for the design of clinical trials that may produce required outcomes for both regulatory approval or clearance and positive coverage determinations." **
  - Eliminates the potential for differences between the FDA approved label and the CMS coverage
  - To date only one device has successfully navigated this process:
    - Cologuard (manufactured by Exact Sciences in Madison, Wisconsin), the first stool-based colorectal screening test
    - FDA Approved and Proposed CMS NCD on the same day

*http://www.fda.gov/aboutfda/centersoffices/officeofmedicalproductsandtobacco/cdrh/cdrhinnovation/ucm456149.htm

Strong Interest From Industry In This Innovative New Process