



Post-Approval Studies Update

Gastroenterology and Urology Devices Panel

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Outline

- Post-Approval Studies (PAS)
Program Update
- Urology PAS Update

PAS Legal Authority

- **Title 21 Section 814.82**
- (a) FDA may impose post-approval requirements at the time of approval of the PMA or by regulation subsequent to approval and may include:
 - (2) Continuing evaluation and reporting on the safety, effectiveness, and reliability of the device for its intended use. FDA will state the reason and the number of patients to be evaluated.
 - (9) Other requirements as FDA determines necessary to provide (continued) reasonable assurance of the safety and effectiveness of the device.

Need for Post-Approval Studies

- Gather essential postmarket information
 - » Longer-term performance including effects of re-treatments & product changes
 - » Community performance (clinicians & patients)
 - » Effectiveness of training programs
 - » Sub-group performance
 - » Outcomes of concern
- Balance premarket burdens
- Account for Panel recommendations

PAS General Principles

- Objective is to evaluate device performance and potential device-related problems in a broader population over an extended period of time after premarket establishment of reasonable device safety and effectiveness
- Post-approval studies **should not** be used to evaluate unresolved issues from the premarket phase that are important to the initial establishment of device safety and effectiveness

Post-Approval Studies



**Least Burdensome
Evidence To Support
Premarket Approval**

**Assurance of Continued
Product Safety
and Effectiveness**

Major Goals of PAS Program Transformation

- Enhance scientific rigor of PAS
- Establish and maintain accountability for the PAS commitments
- Build PAS information management system
- Build bridges between the postmarket knowledge and premarket device evaluation
- Increase the transparency with the public

Areas of PAS Program Transformation

- Oversight
- Tracking
- Review
- Guidance
- Web Posting
- Postmarket Advisory Panel Updates
- Building Public Health Partnerships

PAS Oversight

January 1, 2005 Initial Transfer

April 2, 2007 Full Transfer

ODE/OIVD



OSB

PAS Tracking System

- Developed & instituted automated tracking system for post-approval study commitments

Premarket Review Process

- Epidemiologist on each PMA team
 - Lead the design of PAS study
 - Work interactively with sponsors
 - Present at Panel meetings
- PAS Protocol/outline finalized at the time of PMA approval
- Agreed upon study timelines

Postmarket Review Process

- Epidemiology lead on all PAS Reports and all PAS Supplements involving changes to PAS protocol
- Postmarket Review Team
 - Epidemiology lead
 - Feedback to premarket

Post-Approval Studies Guidance Document

- Guidance for Industry and FDA Staff: Procedures for Handling Post-Approval Studies Imposed by PMA Order (December 21, 2006, revised August 1, 2007)

<http://www.fda.gov/cdrh/osb/guidance/1561.html>

Reporting Status Definitions

- Report On- time : FDA has received the scheduled Interim or Final Post-Approval Study Status Report by the due date.
- Report Overdue : FDA has not received the Interim or Final Post-Approval Study Status Report by the due date.
- Report Overdue/Received: FDA has received the Interim or Final Post-Approval Study Status Report, although past the due date.
- Final Post-Approval Study Report Submitted : The study has been concluded or terminated, and the Final Post-Approval Study Report has been submitted.

Study Status Definitions

- Protocol Pending: FDA has not approved the study protocol and it has been less than 6 months since the approval of the PMA.
- Protocol Overdue: FDA has not approved the study protocol and it has been 6 months or more since the approval of the PMA
- Study Pending : The protocol has been approved but the study has not begun (i.e., no subjects have been enrolled), and the projected date for completing patient accrual has not passed.
- Study On-time : The study is proceeding according to, or is ahead of, the agreed upon schedule .
- Study Overdue: The study has not been initiated by the projected date for completion of patient enrollment or the study is behind the agreed upon schedule.
- Study Terminated : FDA granted an early termination of the study because the study is either no longer feasible or would no longer provide useful information.
- Study Completed: FDA has reviewed the Final Post-Approval Study Report and determined that the study fulfills the commitment.

PAS Web Page

- Went live on April 6, 2007
- Reporting Schedule Status
- PAS Study Progress
- Post – 2005 Studies

http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfPMA/pma_pas.cfm



Post Approval Studies

- The new Center for Devices and Radiological Health (CDRH) Post-Approval Studies Program encompasses design, tracking, oversight, and review responsibilities for studies mandated as a condition of approval of a premarket approval (PMA) application. The program helps ensure that well-designed post-approval studies (PAS) are conducted effectively and efficiently and in the least burdensome manner.
- On January 1, 2005, the oversight responsibility was transferred to CDRH's Office of Surveillance and Biometrics (OSB) and the PAS review functions were integrated into the medical device epidemiology program. Guidance on report format and content was developed to ensure optimal PAS reporting and review. <http://www.fda.gov/cdrh/osb/guidance/1561.html>.
- CDRH has established a new automated tracking system that efficiently identifies the reporting status of active PAS studies ordered since January 1, 2005. This system represents CDRH's effort to ensure that all PAS commitments are fulfilled in a timely manner. The effective tracking system is based on study timelines incorporated in study protocols and agreed upon by the CDRH and manufacturer.
- In addition to this internal tracking system, CDRH launched this publicly available webpage to keep all stakeholders informed of their progress. It displays not only the report status, but also study status (based on protocol-driven timelines) of each PAS.

[A](#) [B](#) [C](#) [D](#) [E](#) [M](#) [O](#) [P](#) [S](#) [T](#) [U](#) [V](#) [W](#) [Z](#)

66 records

[Show All Studies](#)

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Application Number	Applicant Name	Device Name	Medical Specialty	Date PMA Approved	Post-Approval Study Commitment	Study Name	Protocol Approved	Study Population	Study Status
P040038	ABBOTT VASCULAR DEVICES	XACT CAROTID STENT SYSTEM	Cardiovascular	09/06/2005	1. YOU HAVE AGREED TO CONDUCT THE FOLLOWING STUDIES AND TO REPORT ON THESE STUDIES EVERY <input type="checkbox"/>	PROTECT Study	02/05/2007	Transitional Adolescent B: 18-21 yrs, Adult: >21	Study time
						EXACT Study	10/12/2005	Transitional Adolescent B: 18-21 yrs, Adult: >21	Study time
H040006	ABIOMED, INC.	ABIOCOR	Cardiovascular	09/05/2006		Abiocr Artificial Heart	09/05/2006	Transitional Adolescent B:	Study time

Postmarket Advisory Panel Updates

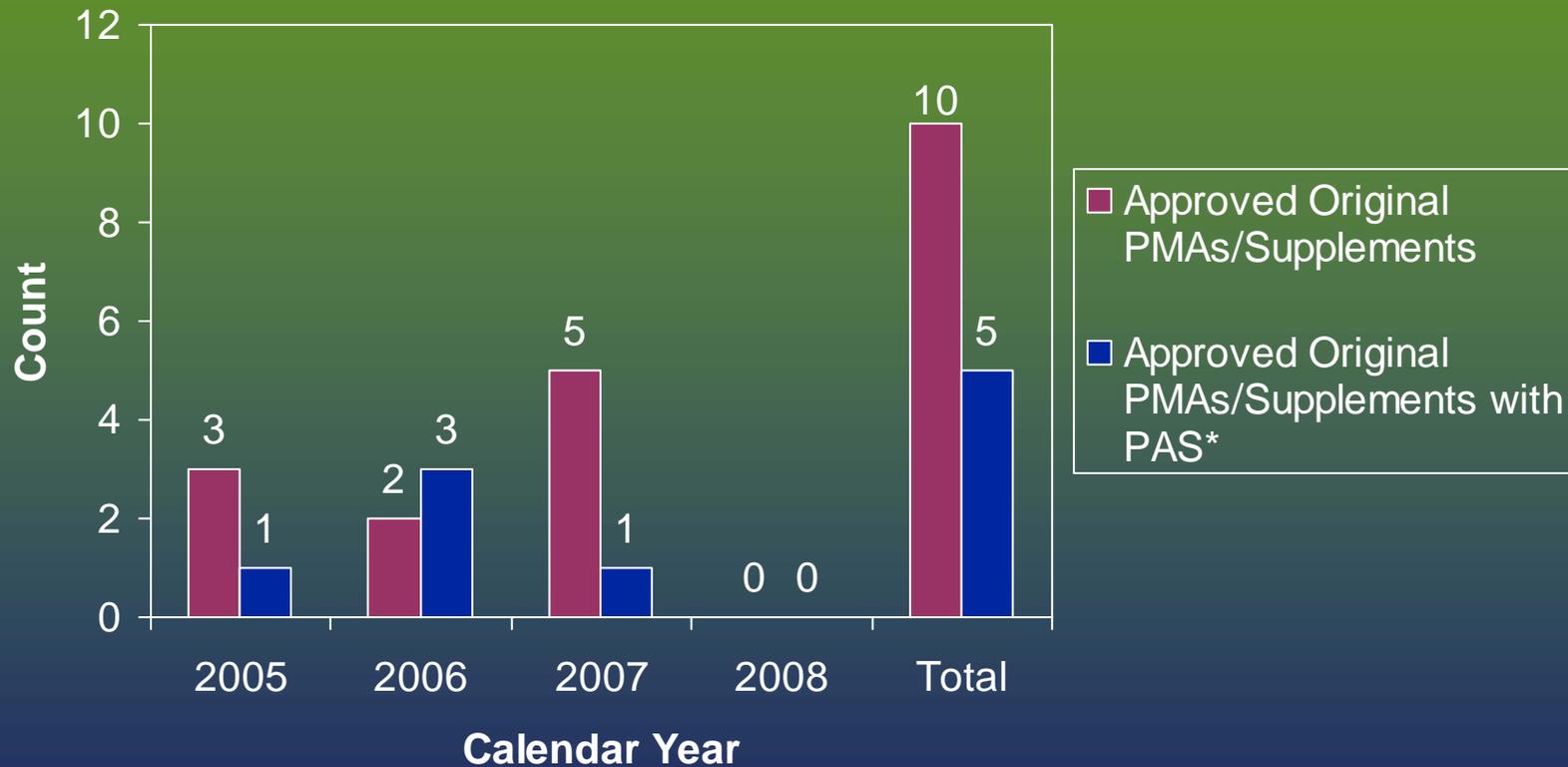
- General PAS Updates
 - First presented November 24, 2007
 - At every Panel meeting
- Specific PAS Updates
 - January 26, 2007
 - December 14, 2007



Building Public Health Partnerships

- First FDA/FDLI PAS Conference, May 10-11, 2007
- Continued dialogue with stakeholders
- Two PAS conferences planned for 2008/2009

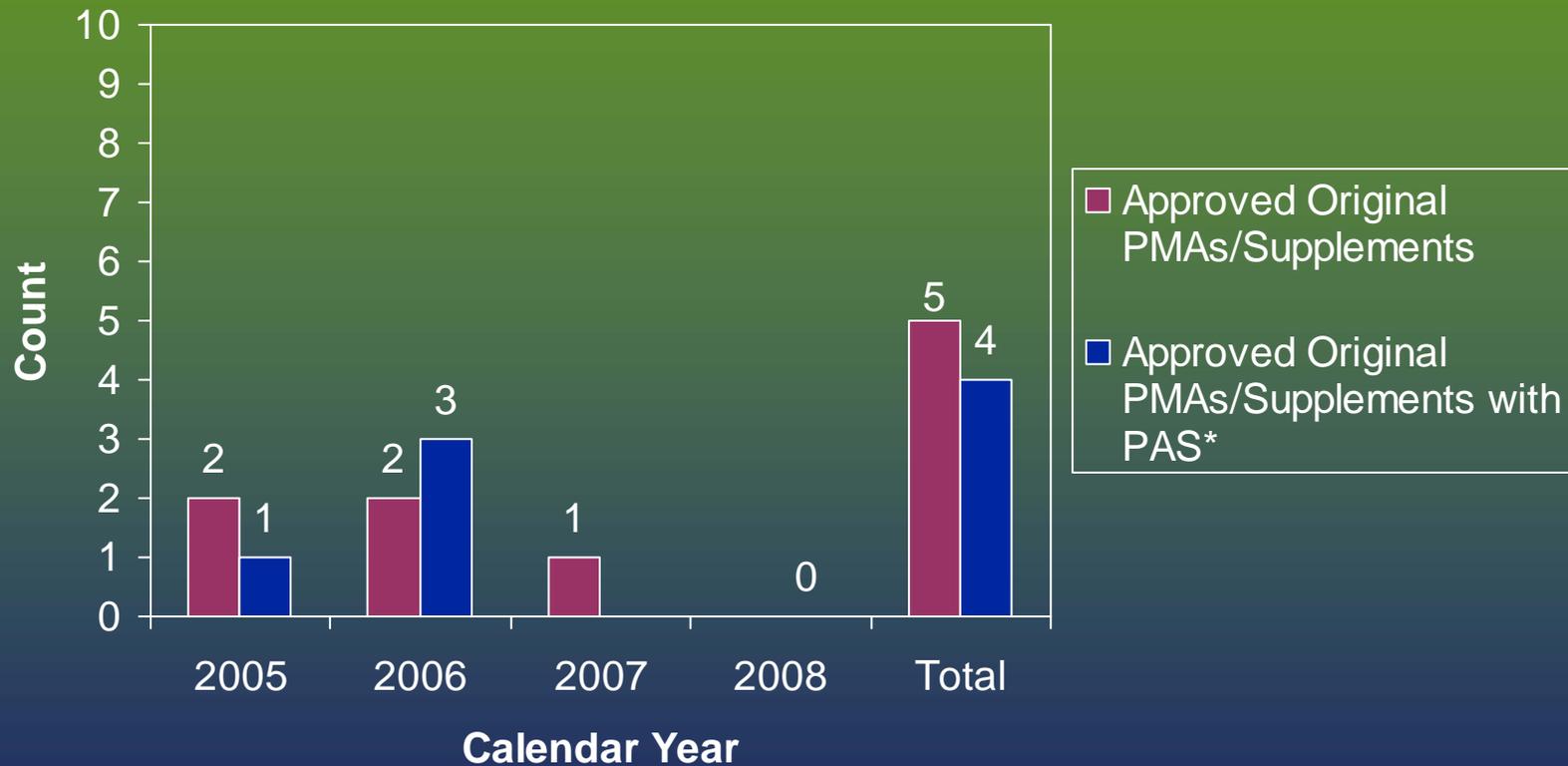
Gastroenterology/Renal and Urology Original PMAs and Panel Track Supplements Approved 2005 - 2008



*One PMA has two post-approval studies.

As of June 23, 2008

Urology Original PMAs Approved 2005 - 2008



*One PMA has two post-approval studies.

As of June 23, 2008

Post-Approval Studies for Urology Devices, 2005-2008

PMA	Sponsor	Device	Study
P000053/S005	American Medical Systems, Inc.	Sphincter 800 urinary control system	Registry AMS MC-0611
P040047	Bioform Medical, Inc	Coaptite	PAS Study
P040050	Uroplasty, Inc	Macroplastique Implants	Real-Time Observation of Safety and Effectiveness (ROSE), Registry
	Uroplasty, Inc	Macroplastique Implants	Enhanced Surveillance System

Registry AMS MC-0611 Post-Approval Study

Objective	<ul style="list-style-type: none">■ To compare the rates of device replacement surgery subsequent to (i) infection or (ii) mechanical failure; with antibiotic impregnated versus non-impregnated versions of the device.
Study Design	<ul style="list-style-type: none">■ Registry
Population	<ul style="list-style-type: none">■ Patients who have received device in the US, subsequent to October 2006.
Endpoints	<ul style="list-style-type: none">■ Infection, mechanical failure
Study Duration	<ul style="list-style-type: none">■ 5 years■ Comparison of rates will be performed on a yearly basis
Study Progress Status	<ul style="list-style-type: none">■ On-time

Macroplastique Real-Time Observation of Safety and Effectiveness (ROSE) Post-Approval Study

Objective	■ To evaluate long-term safety and effectiveness of device
Study Design	■ Registry
Population	■ Patients receiving device ■ 275 subjects
Endpoints	■ Durability of treatment effect, impact of re-treatment
Study Duration	■ 5 years post-implant
Follow-up Visits	■ Pre-treatment evaluation, 3-month post-implant, annually thereafter.
Study Progress Status	■ On-time

Macroplastique Enhanced Surveillance System

Objective	■ To evaluate long-term safety
Study Design	■ Active Surveillance System
Population	■ All patients receiving device
Endpoints	■ Any adverse events
Study Duration	■ 2 years post PMA approval
Follow-up Visits	■ Active solicitation, on a quarterly basis, of adverse events information from ALL physicians using the device in the US.
Study Progress Status	■ On-time

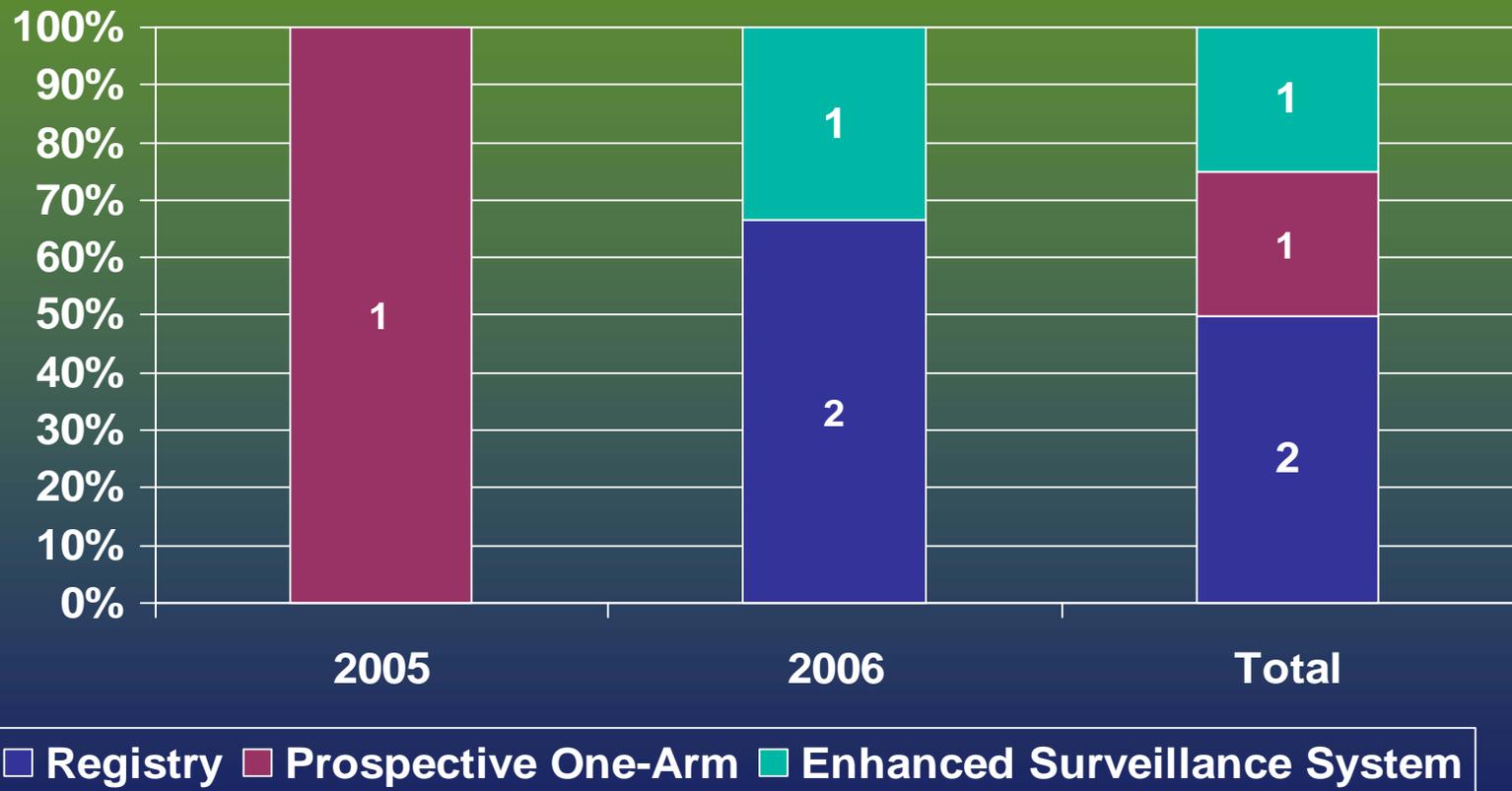
Coaptite Post-Approval Study

Objective	■ To evaluate long-term safety and effectiveness
Study Design	■ Prospective one-arm
Population	■ Adult females with a diagnosis of stress urinary incontinence due to intrinsic sphincter deficiency ■ 420 patients, up to 20 sites
Endpoints	■ Durability of treatment, re-injection rate, impact of re-treatment, tissue erosion rate and other adverse events
Study Duration	■ 3 years post-implant
Follow-up Visits	■ Every 6 months after the first injection
Study Progress Status	■ Protocol recently approved

Distribution of Study Designs

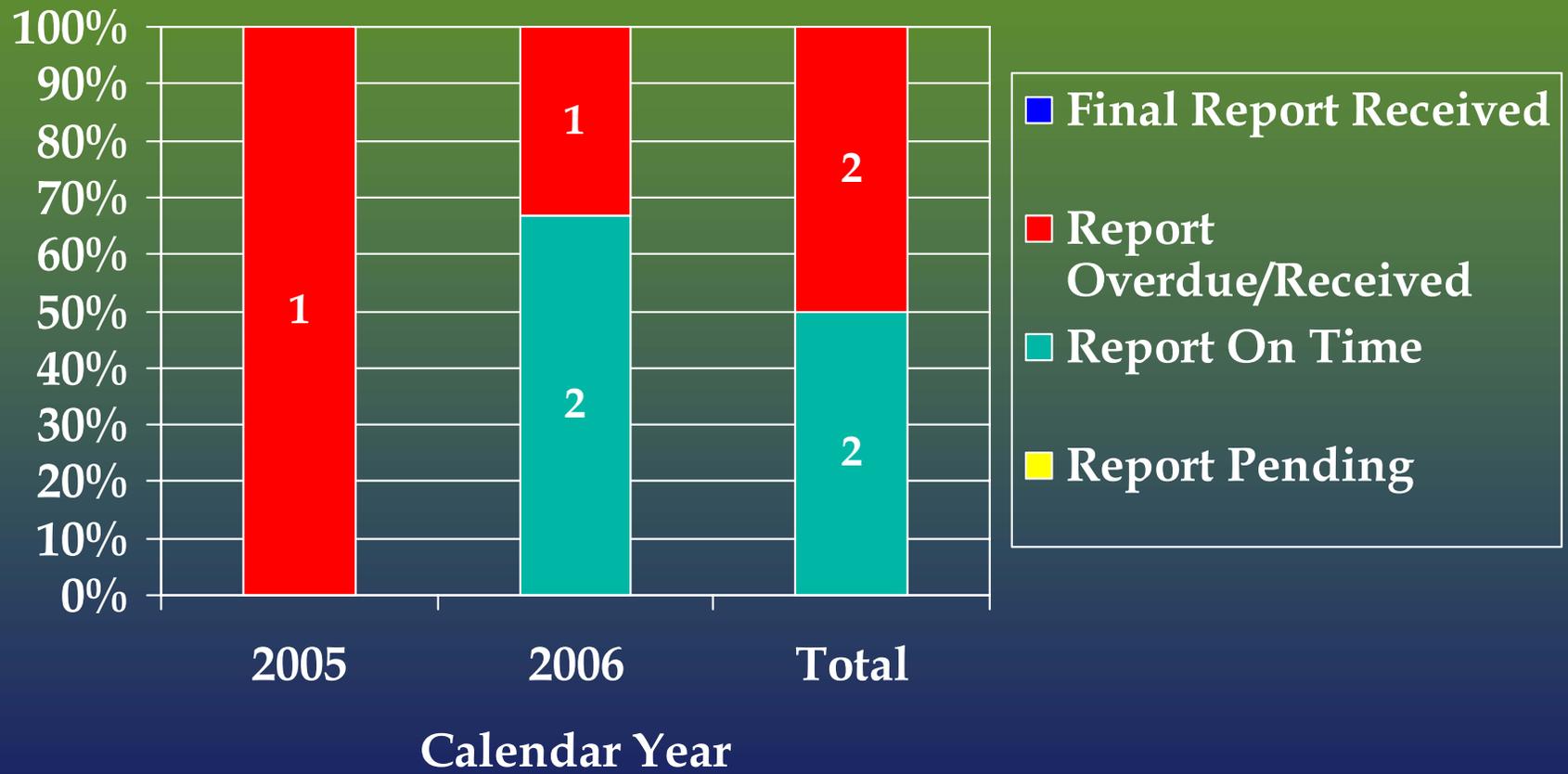
Post-Approval Studies Urology Devices

2005 - 2008



As of June 23, 2008

Reporting Status PAS Urology Devices by Approval year, N= 4 Studies



As of June 23, 2008

Progress Status PAS Urology Devices by Approval Year, N=4 Studies



As of June 23, 2008

Post- Approval Studies Vision

- Important postmarket questions are addressed
- Studies are realistic & founded on good science
- Studies are timely, accurate, & provide useful results
- Reports are clearly identified & effectively tracked
- Stakeholders are kept apprised
- Collaboration is stressed throughout
- Enforcement options are rarely used

Questions, Suggestions, Ideas?



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