FDA Executive Summary: Errata

Prepared for the November 10, 2016 meeting of the Microbiology Devices Panel of the Medical Devices Advisory Committee

Discussion and Recommendations for the Application of Procalcitonin to the Evaluation and Management of Suspected Lower Respiratory Tract Infections and Sepsis

Gaithersburg, Maryland

- 1. Throughout the executive summary, FDA used the term 'de-escalation' for the sepsis claim. However, bioMérieux is seeking a claim for antibiotic discontinuation to be more precise in their labeling and exclude dose reductions, changes to targeted antibiotic therapy or other antibiotic adjustments.
- In Table 1 below, the median duration of antibiotics in days for inpatients was incorrectly stated to be -3.26 (-3.72, -2.79). The correct median duration of antibiotics for inpatients is -3.07 (-3.54, -2.60). For outpatients, the median duration in days was incorrectly stated to be -1.75 (-2.28, -1.21). The correct median duration of antibiotics is -1.68 (-2.21, -1.14).
- 3. On page 18 of the executive summary, it is stated that there were no U.S. clinical trial sites in sepsis meta-analyses. However, one of the three clinical trial sites from the Stolz et al. study was in the United States. (Stolz et al., 2009)

LRTI Patient-Level Data Subgroup Analysis	Standard Therapy	PCT-guided Therapy	Adjusted OR or Difference (95% CI) ^b
Overall	1606	1536	
Initiation of antibiotics, n(%)	1420 (88.7)	1096 (71.4%)	0.27 (0.22, 0.33)
Duration of antibiotics in days, median (IQR) ^c	10 (7, 12)	7 (4, 10)	-2.9 (-3.3, -2.5)
САР	1028	999	
Initiation of Antibiotics n(%)	1019 (99%)	898 (90%)	0.07 (0.03, 0.14)
Duration of Antibiotics in days median (IQR)	10 (8, 14)	7 (5, 10)	-3.34 (-3.79, -2.88)
Bronchitis	282	249	
Initiation of Antibiotics n(%)	185 (66%)	61 (25%)	0.15 (0.10, 0.23)
Duration of Antibiotics in days median (IQR)	7 (5, 8)	7 (4, 9)	-0.38 (-1.21, 0.46)
AECOPD	296	288	
Initiation of Antibiotics n(%)	216 (73%)	137 (48%)	0.32 (0.23, 0.46)
Duration of Antibiotics in days median (IQR)	8 (6, 10)	6 (3, 9)	-1.58 (-2.33, -0.82)
Inpatients	1139	1106	
Initiation of Antibiotics n(%)	1039 (91.2%)	881 (79.7%)	0.35 (0.27, 0.46)
Duration of Antibiotics in days median (IQR)	10 (8, 14)	7 (4, 10)	<u>-3.07 (-3.54, -2.60)</u> - <u>3.26 (-3.72, -2.79)</u>
Outpatients	467	430	
Initiation of Antibiotics n(%)	381 (81.6%)	215 (50%)	0.13 (0.09, 0. 19)
Duration of Antibiotics in days median (IQR)	7 (6, 10)	6 (4, 8)	<u>-1.68 (-2.21, -1.14)</u> - <u>1.75 (-2.28, -1.21)</u>

Table 1^a

^a Modified table from Table 15, Figures 11 and 12 in the bioMérieux executive summary and Section 26.3 of 'Clinical Performance Characteristics.'

^b Multivariable hierarchical model adjusted for age and diagnosis and trial as a random effect; For the subgroup by type of LRTI, diagnosis was not included in the model.

^c Duration includes subjects who were initiated on antibiotics

Reference:

Stolz, D., Smyrnios, N., Eggimann, P., Pargger, H., Thakkar, N., Siegemund, M., . . . Tamm, M. (2009). Procalcitonin for reduced antibiotic exposure in ventilator-associated pneumonia: a randomised study. *Eur Respir J*, 34(6), 1364-1375. doi: 10.1183/09031936.00053209