Waiver to Allow Participation in a Food and Drug Administration Advisory Committee

DATE: May 4, 2018

TO: Rachel Sherman, MD, MPH
Principal Deputy Commissioner
Office of Medical Products and Tobacco
Office of the Commissioner, Food and Drug Administration

THROUGH: Russell Fortney
Director, Advisory Committee Oversight and Management Staff
Office of Special Medical Programs

FROM: Laura E. Bailey, M.S.
Chief, Committee Management Branch
Division of Workforce Management, OM
Center for Devices and Radiological Health (CDRH)

Name of Advisory Committee Meeting Member: Richard L. Page, M.D.

Committee: Circulatory System Devices Panel of the Medical Devices Advisory Committee

Meeting date: June 12, 2018

Description of the Particular Matter to Which the Waiver Applies:

The Panel will discuss, make recommendations and vote on the premarket approval application (PMA) submitted by Cordis, Inc., a subsidiary of Cardinal Health, Inc., for the INCRAFT AAA Stent Graft System, which is intended for the endovascular treatment of infrarenal abdominal aortic aneurysms in patients with appropriate anatomy. The INCRAFT device is being evaluated in the INSPIRATION study, a multicenter, prospective, non-randomized investigation. The study met its primary safety and effectiveness endpoints, but results also showed higher than anticipated rates of certain adverse events. The committee discussion will focus on how these events impact the long-term safety and effectiveness, as well as the benefit/risk profile of the device.

The meeting type is a particular matter involving specific parties.

Type, Nature, and Magnitude of the Financial Interest(s):

Richard L. Page, M.D. serves as Chairperson of the Circulatory System Devices Panel, which reviews and evaluates data concerning the safety and effectiveness of marketed and investigational devices for use in the circulatory system and makes appropriate recommendations to the Commissioner of Food and Drugs. Dr. Page's employer, University of Wisconsin School of Medicine and Public Health (UWSMPH), is one of (b)(4) clinical sites for Cordis, Inc.'s INCRAFT AAA Stent Graft System study, the INCRAFT Stent Graft System in Subjects with Abdominal Aortic Aneurysms (INSPIRATION) trial. The premarket approval application (PMA) for the INCRAFT AAA Stent Graft device is the particular matter under review by the Panel at this meeting. Data from the INSPIRATION trial supports the PMA.

Dr. Page is not personally involved with the INSPIRATION trial at UWSMPH. The study's investigator is on the faculty of the Division of Vascular Surgery, Department of Surgery. Dr. Page is chair of the Department of Medicine. Dr. Page does not oversee or have any relationship with the investigator's activities, including any clinical trial involvement.

Dr. Page's employer was awarded between $0 and $5,000 in 2017 and between $0 and $5,000 to date in 2018 in funding for INSPIRATION trial-related activities. Payments are allocated between $0 and $5,000 for annual visits of patients who are in the follow-up phase.

Basis for Granting the Waiver:

Dr. Page has unique qualifications and specialized expertise needed for this particular matter.

Dr. Page is a highly regarded clinical cardiologist with significant experience in cardiovascular clinical trials and FDA Advisory Committee meetings. He received his M.D. and B.S. degrees from Duke University. He was a Resident at the Massachusetts General Hospital and performed cardiology and clinical cardiology fellowships at Duke University Medical Center. He has had academic appointments at medical schools since 1989 and since 2009 has been the Chair of the Department of Medicine at University of Wisconsin School of Medicine and Public Health in Madison, Wisconsin. Dr. Page was on the American College of Cardiology/American Heart Association Task Force on Practice Guidelines and a co-author on two published clinical practice guidelines that include recommendations for managing patients with aortic aneurysms, the subject of this panel meeting: the 2005 "Practice Guidelines For The Management Of Patients With Peripheral Arterial Disease (Lower Extremity, Renal, Mesenteric, And Abdominal Aortic)," and the 2010 "Guidelines For The Diagnosis And Management Of Patients With Thoracic Aortic Disease." Dr. Page has served on the Circulatory System Devices Panel as a member and chair on multiple occasions, and his contributions to the panel's discussions have been significant, demonstrating a commitment to the interests of public health.

There is limited expertise available and it is difficult to locate similarly qualified individuals without a disqualifying financial interest.

The CDRH division responsible for the review of this PMA believes that this will be a complex panel discussion due to the need to understand converging topics in cardiovascular disease, medical imaging, mechanical engineering, and interpreting clinical trial results. The panel will be

asked to consider the impact of each of these different factors both individually and together. As such, it is critically important to have an experienced chair that can help the Advisory Committee navigate this difficult discussion in an objective and systematic manner. The division has not been able to identify another individual that approaches Dr. Page's years of experience as panel chair and expertise in cardiovascular disease and clinical trials and would be unable to do so in the limited time before the panel meeting.

The particular matter is not sensitive.

The particular matter to be addressed by the panel is not considered sensitive. This is a technology that has been a subject of research and investigation for several years. CDRH has had other similar meetings for aortic aneurysm devices and the past meetings addressing this technology were not deemed to be sensitive. This meeting is not expected to be different.

Dr. Page's expertise in this particular matter is necessary in the interest of public health.

Dr. Page has served on the Circulatory System Devices Panel as a member and chair on multiple occasions, and his contributions to the panel's discussions have been significant, demonstrating a commitment to the interests of public health. Further, in the interest of public health, it is critical for the agency to review new products that can potentially provide treatment for cardiovascular disease, such as abdominal aortic aneurysms, which are life threatening if left untreated. Given that the durability of the repair with this device is in question and a device failure could lead to death, public health demands a rigorous review of the data and a productive discussion among the advisory committee members. Dr. Page's knowledge of cardiovascular diseases and clinical trial design, along with his experience as a panel chair, will provide the necessary expertise for this important discussion.

Any potential for a conflict of interest is greatly outweighed by the strong need for Dr. Page's expertise in this matter.

Dr. Page is employed by one of the (b)(4) U.S. sites participating in the INSPIRATION clinical study for the device under discussion: Cordis® INCRAFT® AAA Stent Graft System. However, he does not have any involvement or oversight with the study itself. Dr. Page is Chair of the Department of Medicine and the study is conducted in the Department of Surgery. Dr. Page does not oversee or have any relationship with the study's investigator. Additionally, the study site enrolled a total of five subjects, a small percentage (2.6%) of the U.S. sample size. No additional subjects have been enrolled since July 2013, and no additional subjects are being recruited to participate in the study at the site. Follow-up visits for patients enrolled at the study site are due to be fully completed within weeks after the conclusion of the panel meeting. Any potential conflict of interest created by this situation is greatly outweighed by the need for Dr. Page's significant expertise as panel chair and as an expert in clinical studies for cardiovascular disease, both of which are imperative to the success of this panel meeting.

Accordingly, I recommend that you grant a waiver for Dr. Richard L. Page, Chairperson of the Circulatory System Devices Panel meeting being held June 12, 2018, from the conflict of interest prohibitions of 18 U.S.C. § 208(a).

Certification:

___X_____ The individual may participate, pursuant to 18 U.S.C. 208(b)(3) – The need for the individual's services outweighs the potential for a conflict of interest created by the financial interest involved.

Limitations on the Special Government Employee's Ability to Act:

_____ Non-voting

_____ Other (specify):

_____

_____

_____ Denied – The individual may not participate.

_____/S/_____ ___5/14/2018 _____

Rachel Sherman, MD, MPH
Principal Deputy Commissioner
Office of Medical Products and Tobacco
Office of the Commissioner, Food and Drug Administration

Date