

# Indications for Use (IFU)



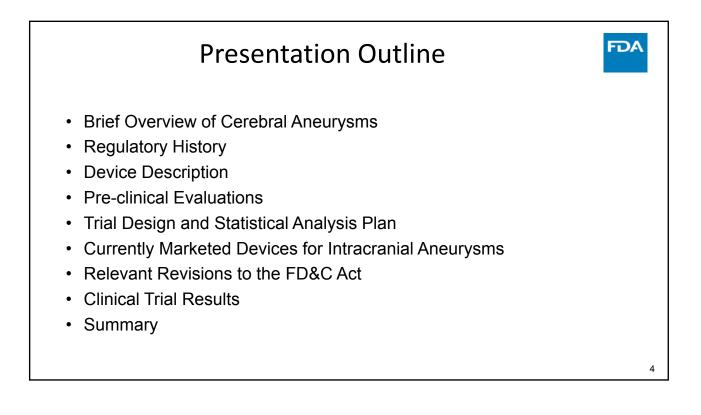
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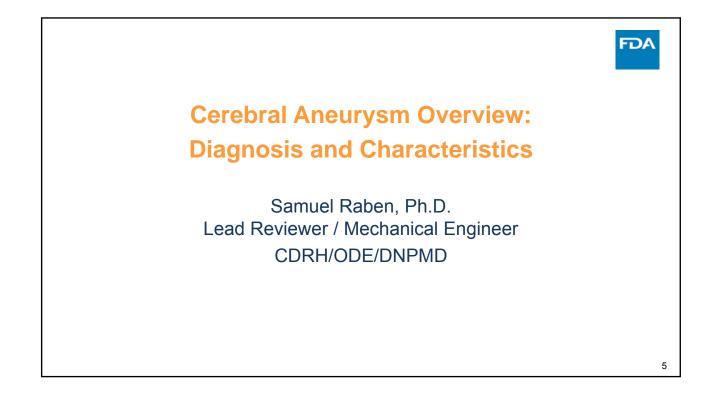
The WEB Aneurysm Embolization System is indicated for the embolization of intracranial WNBAs. The WEB Aneurysm Embolization System is further indicated to embolize intracranial wide neck bifurcation aneurysms ranging in size from 3 mm to 10 mm in dome diameter, where the neck size is 4 mm or greater or the dome-to-neck ratio is less than 2.

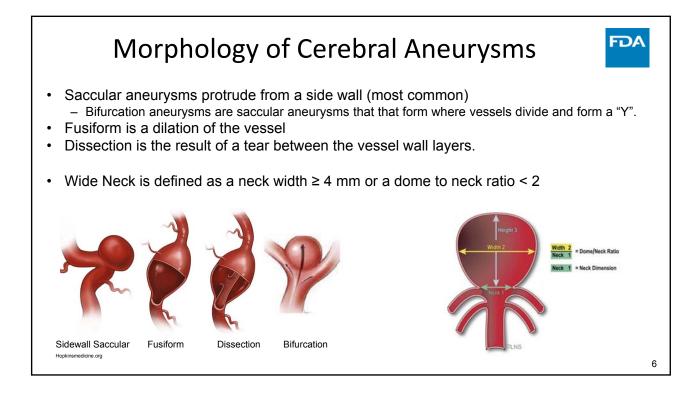
### Revised:

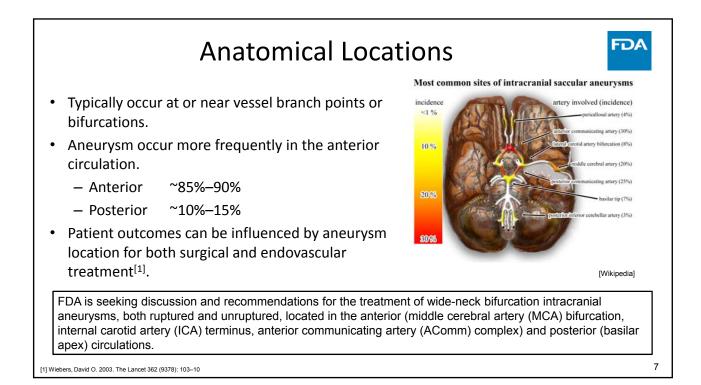
The WEB Aneurysm Embolization System is indicated for the embolization of intracranial WNBAs. The WEB Aneurysm Embolization System is further indicated to embolize <u>saccular</u> intracranial WNBAs located in the <u>anterior (middle cerebral artery (MCA) bifurcation, internal carotid artery (ICA)</u> <u>terminus, anterior communicating artery (AComm) complex) and posterior (basilar apex)</u> <u>circulations</u>, ranging in size from 3 mm to 10 mm in dome diameter, where the neck size is 4 mm or greater or the dome-to-neck ratio is less than 2.

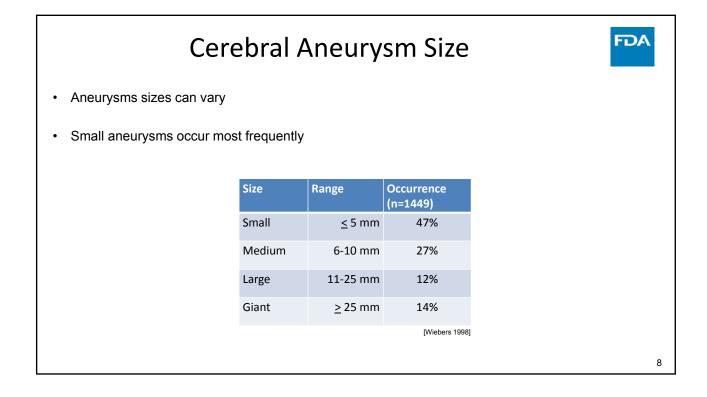
The Panel will be asked to discuss and make recommendations on whether the proposed indications for use is supported by the data collected in the pivotal WEB-IT study, including, but not limited to, location of target intracranial aneurysm, size, morphology, and ruptured vs. unruptured status. Also, the Panel will be asked whether there should be specific contraindications, warnings, precautions, instructions for use that should be conveyed in the Directions for Use (DFU) to ensure the safe and effective use of the subject device.



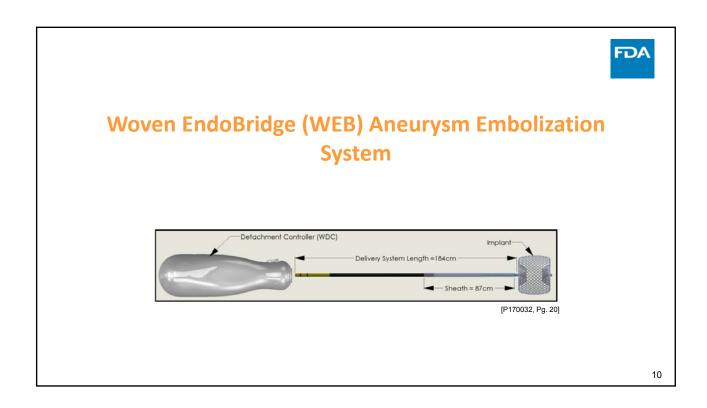


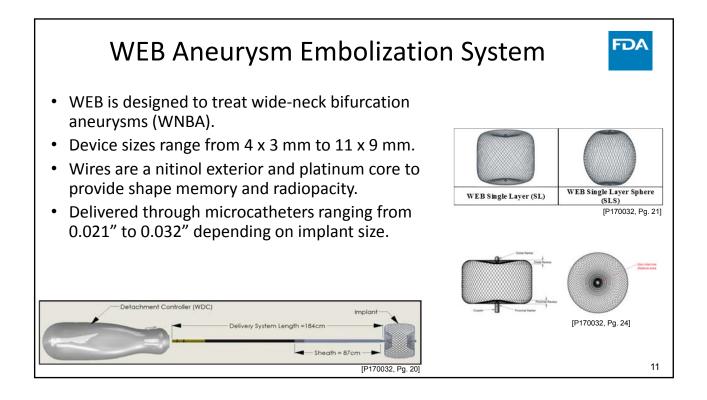


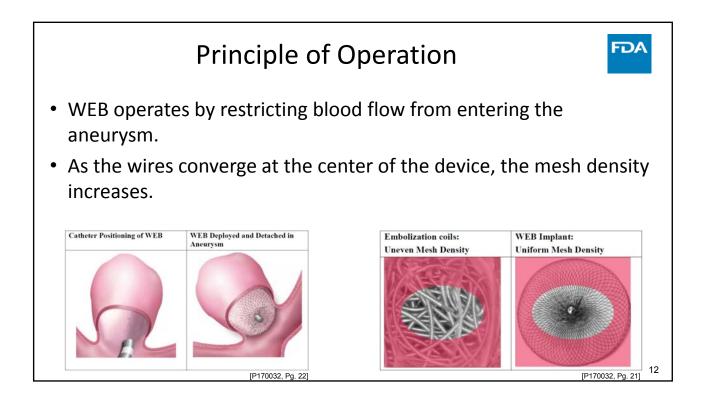


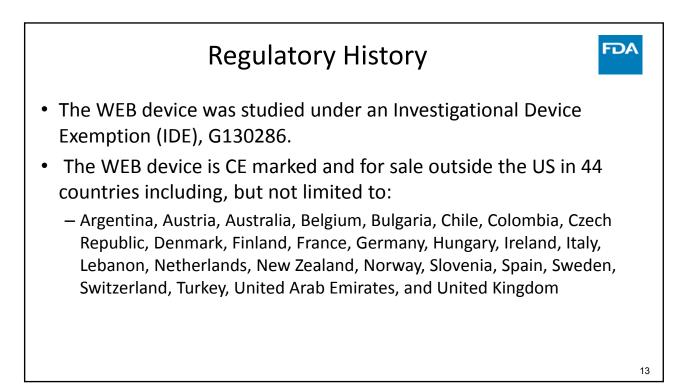


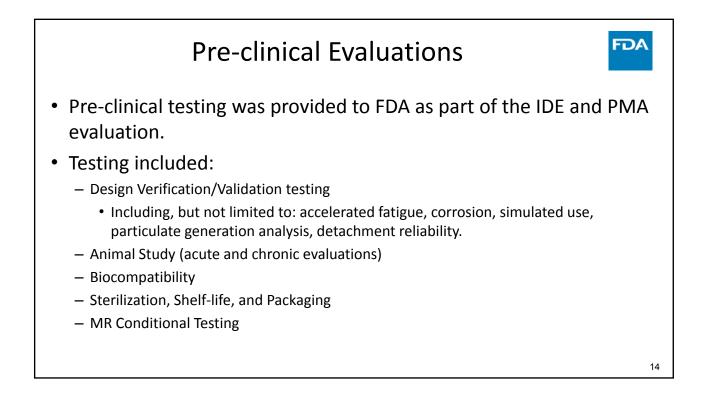
### FDA **Risk Factors for Aneurysm Rupture** Difficult to predict the risk of aneurysm rupture. ٠ Risk factors can include, but not limited to, family history, history of prior subarachnoid hemorrhage ٠ (SAH), gender, smoking, location of aneurysm, morphology, and overall size. Rupture Rate over 5 years (n=4060) <7mm 7-12mm 13-24mm ≥ 25mm Anterior Circulation **0%**a 2.6% 14.5% 40% ICA, AComm, ACA, or MCA Posterior 2.5% 14.5% 18.4% 40% Circulation/Posterior **Communicating Artery** [Wiebers, 2003] <sup>a</sup> Only applicable to patients that have no risk factors as listed above. 9

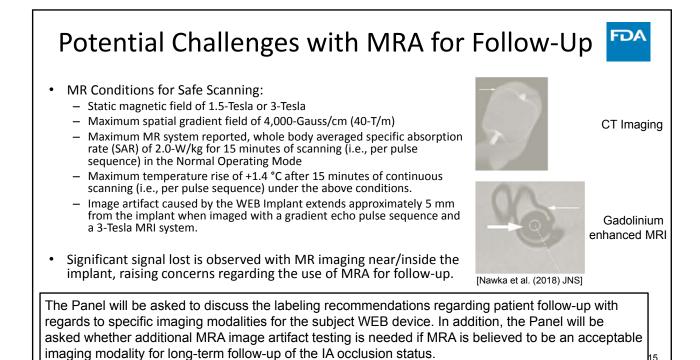






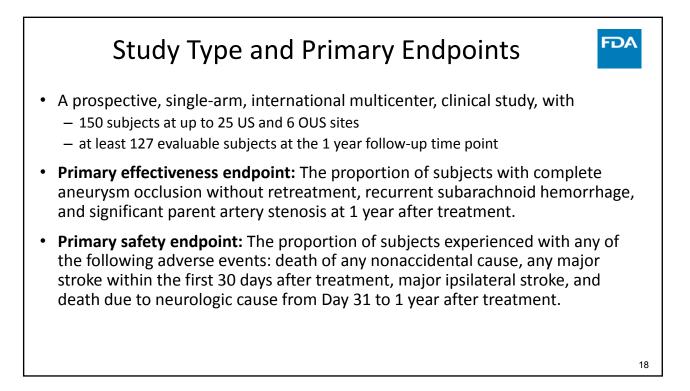




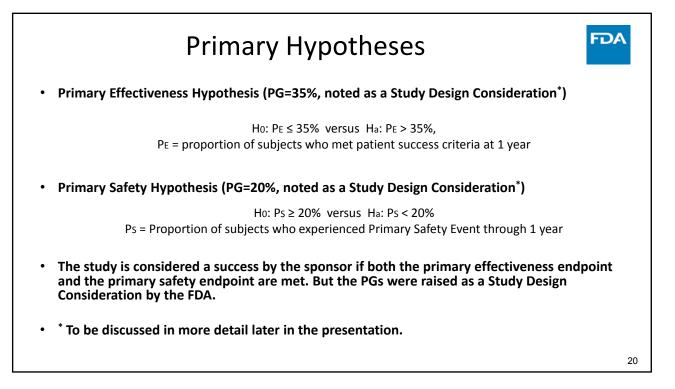




# Outline Study type: single-arm Primary and secondary endpoints Study hypotheses and success criterion Sample size determination Statistical analysis plan Analysis populations Statistical analyses



# Secondary Endpoint and Patient Follow-Up Secondary endpoint: The proportion of subjects experienced with angiographic aneurysmal recurrence defined as aneurysm growth or recanalization at one year after treatment. Follow Up: At discharge, 30 days, 6 months, 1 year, and annually throughout 5 years.



# Derivation of Performance Goal for the Primary Effectiveness Endpoint

Location	Treatment	# of Adjusted Events	# of Evaluated Patients	Fleiss Inverse Variance Weighted Rate (SE)
Antonion	EVT	256	617	0 5084 (0 0067)
Anterior	Surgery	87	143	0.5084 (0.0967)
Destarior	EVT	253	542	0.4660 (0.0211)
Posterior	Surgery	8	17	0.4669 (0.0211)

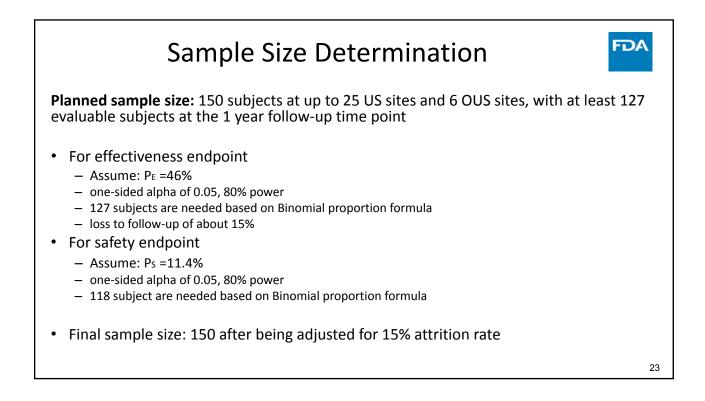
- 80% of the aneurysms to be anterior and 20% posterior bifurcated or wide neck
- Occlusion Rate (SE) Estimated by Fleiss Inverse Variance Weighting: 0.5001
   (0.07746)
- 95% CI: (0.3483, 0.6519)
- Effectiveness PG: 35%

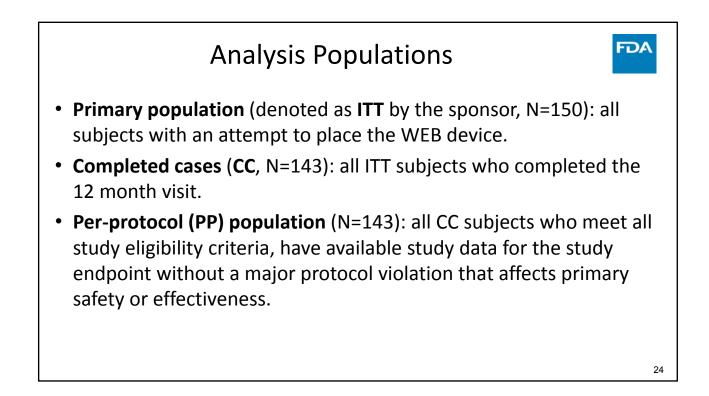
				nce Goal
Location	Treatment	# of Events	# of Patients	Fleiss Inverse Variance Weighted Rate (SE)
	Coil	216	1056	
Anterior	Stent/Coil	41	423	0.1850 (0.0440)
	Surgery	336	1130	
	Coil	241	946	
Posterior	Stent/Coil	59	594	0.1906 (0.0506)
	Surgery	140	641	
	-			wide neck is 20%

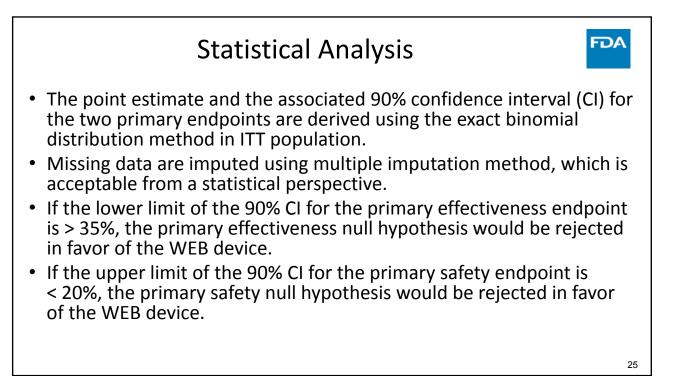
- MAE Rate (SE) Estimated by Fleiss Inverse Variance Weighting: 0.1861 (0.03668)
- 95% CI: (0.1142, 0.2580)
- Safety PG: 20%

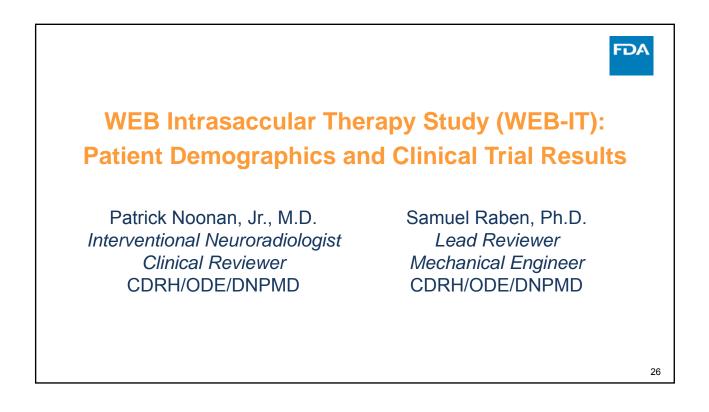
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# Recent PMA Approvals for Intracranial Aneurysm Devices



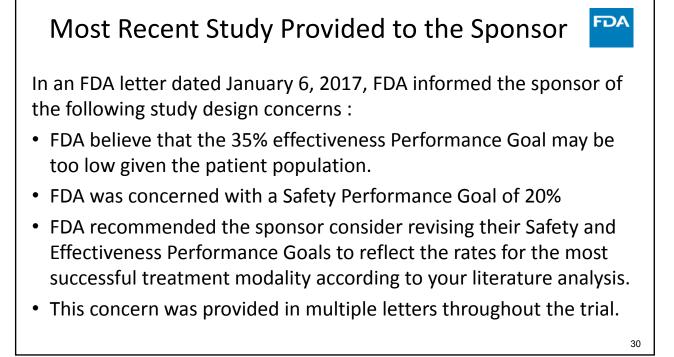
### • Pipeline – Medtronic (P100018)

- 106 in the mITT population (110 total Subjects) . All subjects with large and giant ICA aneurysms

- 70.8% (75/106) with completed occlusion without clinically meaningful stenosis (i.e., <50%)
- 5.6% (6/107 ) of subjects suffered a Major Stroke (NIHSS  $\geq$  4) or death at 180 days
- LVIS MicroVention (P170013)
  - 153 in the ITT population(117 anterior, and 36 posterior)
  - 70.6% with complete occlusion without clinically meaningful stenosis (i.e., < 50%)
  - 5.9% (9/153) of subjects suffered a disabling stroke or neurological death at 1 year
- Surpass Stryker Neurovascular (P170024)
  - 180 in the mITT population (213 total enrolled). All subjects with large and giant ICA aneurysms
  - 62.8% (113/180) with complete occlusion without clinically meaningful stenosis (i.e., < 50%)
  - 6.1% (11/180) of subjects suffered disabling stroke or neurological death at 1 year

### Prior HDE Approvals for Intracranial Aneurysm **Devices** Neuroform ATLAS – Stryker Neurovascular (H020002) 30 subjects (24 anterior, 6 posterior) At 12 months, 25/30 (83.3%) had Raymond-Roy 1 (complete 100%) without retreatment or parent artery stenosis There was no deaths, with 1 major stroke (NIHSS> 4) strokes (1/30, 3.3%) and 2 minor strokes (2/30, 6.7%) Enterprise – Cerenovus (H060001) 28 subjects (22 anterior, 6 posterior) - Greater than 95% occlusion observed in 64% of subjects at 6 months - 1 Subject death (1/28, 3.6%), 2 subjects with Intracerebral Hemorrhage (2/28, 7.1%) and 2 TIA (2/28, 7.1%) PulseRider – Pulsar Vascular (H160002) - 34 subjects were enrolled (27 Basilar apex, 7 ICA terminus) - At 180 days, 22/33 (60.6%) had Raymond-Roy I Occlusion with 29/33 (87.9%) has Raymond-Roy I/II - Zero subjects with neurological death, and 1 subjects (2.9%) with a disabling stroke (mRS > 2) 28

# FDA shall not disapprove an IDE because: The investigation may not support a substantial equivalence or de novo classification determination or approval of a device. The investigation may not meet a requirement, including a data requirement, relating to the approval or clearance of a device; or an additional or different investigation may be necessary to support clearance or approval of the device. This means that an IDE cannot be disapproved on the bases of FDA's belief that the study design is inadequate to support a future PMA, 510(k), humanitarian device exemption (HDE), or de novo classification. Disapproval is based on concerns related to subject safety and protections.



# Objective Performance Criterion vs. Performance Goal



- Developed when device technology has sufficiently matured
- Historical patient-level data from clinical studies/registries
- Used in a dichotomous (pass/fail) manner by FDA for the review and comparison
- Usually not done by a single company nor FDA
- It is important to point out that there are currently very few validated OPCs
- PG is also a numerical value
  - Developed when the device technology is not as well-developed or mature
  - Considered sufficient by FDA for use as a comparison for safety/effectiveness
  - Typically FDA works with Sponsors regarding Performance Goals

https://www.fda.gov/downloads/medicaldevices/deviceregulationandguidance/guidance documents/ucm373766.pdf

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## WEB-IT Trial Design and Patient Population

- This trial was a prospective, multicenter, single arm study
- Include a total of 27 sites (21 US sites and 6 Outside the US)

Population	Description	# of Subjects
Consented	Subjects who signed informed consent form.	179
Screen	Subject who were consented and failed initial screening of inclusion/exclusion criteria.	10
Failures	Subject who were consented and failed procedural angiographic screening criteria.	18
Consented Not Treated	Subjects who were consented and passed initial screening but were not scheduled for procedure.	1
Intent to Treat (ITT)	All subjects in whom a WEB device was attempted to be implanted.	150
Complete Cases (CC)	ITT subjects with a 12-month evaluation for effectiveness.	143
Per Protocol (PP)	CC subjects without a serious protocol deviation.	143

Characteristic	WEB-IT Study (Mean)
Age	59
Weight (kg)	77
Height (cm)	165
Index Aneurysm - Maximum Sac Width (mm)	6.35
ndex Aneurysm - Maximum Neck Width (mm)	4.75
Index Aneurysm - Max Dome-to- Neck Ratio (mm)	1.33

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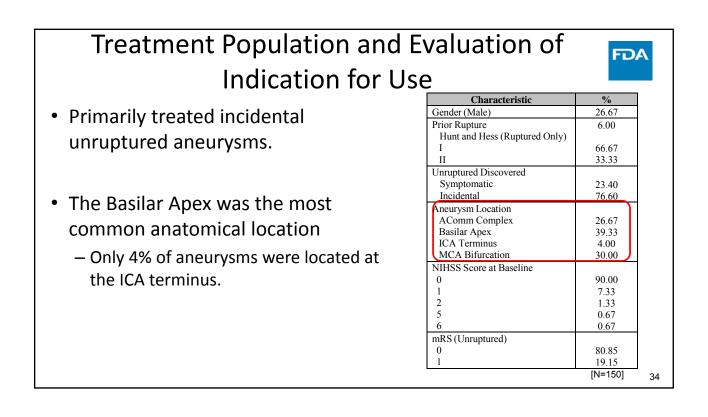
# Key Inclusion/Exclusion Criteria

### **Key Inclusion Criteria**

- Single ruptured or unruptured IA requiring treatment.
  - A ruptured IA patient was defined as a patient with CT, MRI, or LP evidence of subarachnoid hemorrhage attributed to the index aneurysm within the last 60 days.
- The IA treated must have had the following characteristics:
  - Saccular in shape
  - Located in basilar apex (BA), MCA bifurcation, ICA terminus, AComm complex
  - Dome-to-Neck ratio ≥ 1
  - Diameter of the IA appropriate for treatment with the WEB per Instructions for Use
  - Wide-neck IA with neck size ≥ 4 mm or Dome-to-Neck ratio < 2;</li>

### Key Exclusion Criteria

- Patient had an IA with characteristics unsuitable for endovascular treatment
- Patient's index IA was previously treated
- Patient had modified Rankin Scale (mRS) ≥ 2 prior to presentation or rupture (as applicable);
- Patient had a subarachnoid hemorrhage (SAH) from a non-index aneurysm or any other intracranial hemorrhage within 90 days;
- Patient had a life expectancy of less than 5 years due to other illness or condition (in addition to an intracranial aneurysm)

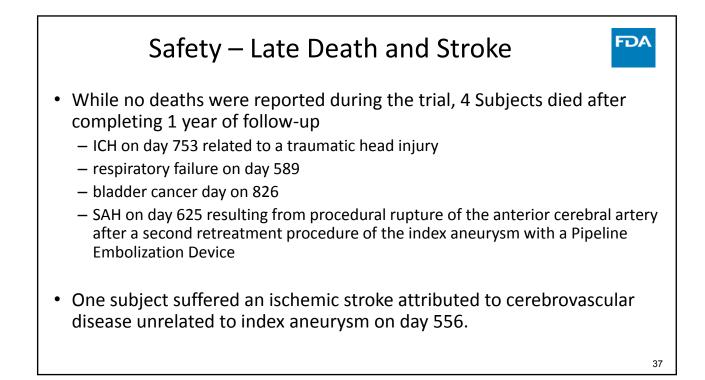


# Primary Safety Endpoint

- Primary safety endpoint was defined as the proportion of subjects with death of any non-accidental cause or any major stroke (defined as an ischemic or hemorrhagic stroke resulting in an increase of 4 points or more on the National Institutes of Health Stroke Scale (NIHSS)) within the first 30 days after treatment or major ipsilateral stroke or death due to neurologic cause from day 31 to 365 days after treatment.
- The primary safety event rate was 0.67% (1/150) in the ITT.
  - A single primary safety endpoint event, a SAH adjudicated as a major stroke, occurred on post-procedure day 22.

Endpoint	%	
Composite FDA Requested All Stroke Primary Safety Endpoint	8.00%	
Death within 30 Days	0.00%	
Any Stroke within 30 Days	6.67%	
Any Ipsilateral Stroke Days 31 to 365	1.36%	
Neurological Death Days 31 to 365	0.00%	
<sup>a</sup> One subject experienced two events, SAH and iso N=150	chemic stroke.	

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## Safety Results – modified Rankin Scale (mRS)

• As recommended by the prior Panel meeting, mRS assessments were performed at baseline and at 12 months follow-up.

10 subjects with unruptured aneurysms had an increased mRS at 12 months
 One subjects with a baseline of zero had 12 month mRS of 4.

mRS Score	n	nRS Score	at 12 Mon	ths	
at Baseline	0	1	3	4	Total
	%a	%a	%a	%a	
0	90.83	8.26	0.00	0.92	109
1	46.15	50.00	3.85	0.00	26
Total	82.22	16.30	0.74	0.74	135

For subjects with ruptured aneurysms, all subjects either maintained or improved their mRS

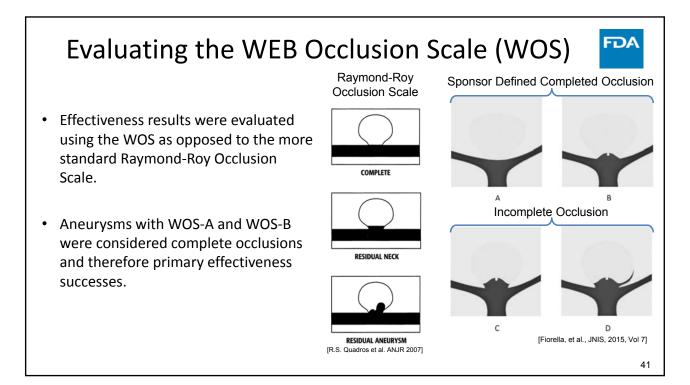
The Panel will be asked to discuss and make recommendations on the pre-specified primary safety endpoint definition and related analyses proposed in the WEB-IT study protocol. The Panel should be prepared to discuss the specific types, severity, and rates of serious adverse events (SAEs) that should be considered in the determination of reasonable safety of the WEB device for the proposed IFU, and whether additional ancillary safety analyses are needed to make this determination.

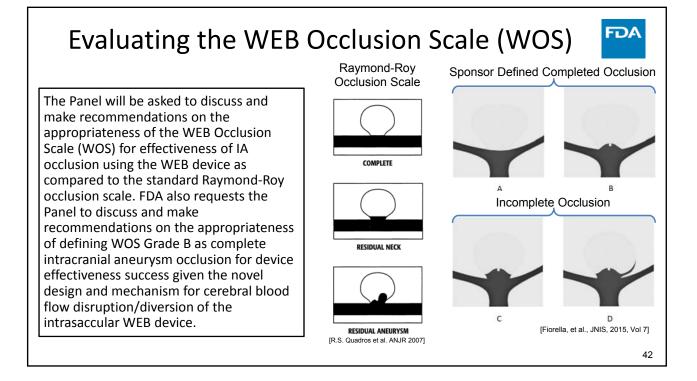
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	291	ely Res	sults – AE'	5	Ð
ystem Organ Class	Preferred Term	AE Rate <sup>a</sup> %	System Organ Class	Preferred Term	AE Rate <sup>a</sup> %
Non-	serious Adverse Events with	n 30 Days	Non-se	rious Adverse Events within 3	1-365 Days
All	All	45.33	All	All	43.33
Nervous System	Ataxia Carotid Artery Dissection	0.67	Eye Disorders	Visual Impairment	2.67
Disorders	Dizziness	0.67	Nervous	Aphasia	0.67
F	Dizziness Postural	0.67	System	Carpal Tunnel Syndrome	0.67
E E E E E E E E E E E E E E E E E E E	Headache	13.33	Disorders	Cerebrovascular Disorder	0.67
E E E E E E E E E E E E E E E E E E E	Hypoaesthesia	0.67		Dementia	0.67
F	Ischaemic Stroke	0.67		Dizziness	0.67
F	Migraine	1.33		Gait Disturbance	0.67
F	Nystagmus	0.67		Headache	13.33
F	Paraesthesia	0.67		Ischaemic Stroke	1.33
F	Subarachnoid Hemorrhage	0.67		Memory Impairment	0.67
E E E E E E E E E E E E E E E E E E E	Transient Ischemic Attack	2.00		Migraine	1.33
•		[N=150]		Restless Leg Syndrome	0.67
				Sciatica	0.67
				Sensory loss	1.33
				Transient Ischemic Attack	1.33

# Primary and Secondary Effectiveness Endpoints

- Primary effectiveness defined as the proportion of subjects with complete aneurysm occlusion using the WEB Occlusion Scale (WOS) without retreatment, recurrent subarachnoid hemorrhage, or significant parent artery stenosis (> 50% stenosis) at one year after treatment as assessed by the Core Laboratory.
- Secondary and other Effectiveness
  - Target Aneurysm Recurrence
  - Parent Artery Stenosis
  - Technical Success





### Effectiveness Results – Occlusion Rates FDA Component Primary Effectiveness Endpoint Success With imaging without imputation in CC 95.10 Primary effectiveness was achieved in 54.77% • 4.90 Imputed as failure for CC of ITT subjects. Aneurysm Occlusion Complete 53.85 Residual Neck 30.77 Residual Aneurysm 15.38 Imputed as Failure for Primary Effectiveness 4.90 44 subjects (31%) had residual aneurysm neck Parent Vessel Stenosis None 89.51 at 12 months. $\leq 50\%$ 4.90 > 50% 0.70 Imputed as Failure for Primary Effectiveness 4.90 Adjunctive Device (Imputed as Failure) 1.40 Failure to Implant (Imputed as Failure) 1.40 More then 15% of subjects had a residual Retreatment of Index Aneurysm (Imputed as Failure) 2.10 aneurysm at 12 months. 0.00 Recurrent Subarachnoid Hemorrhage N=143 subjects, which is the total number of subjects with evaluable 12 month imaging data in the Completed Cases (CC) population The Panel will be asked to consider the totality of the effectiveness data presented regarding whether the results support the

The Panel will be asked to consider the totality of the effectiveness data presented regarding whether the results support the reasonable assurance of effectiveness of the WEB device in the treatment of wide-neck bifurcation intracranial aneurysm studied in the WEB-IT study. The Panel should discuss any additional considerations in the effectiveness results compared to the performance goal of 35% for the primary effectiveness endpoint considering alternative available treatment modalities for the proposed patient population.

# Effectiveness Results – Occlusion Rates

Component	%
Primary Effectiveness Endpoint Success	53.85
With imaging without imputation in CC	95.10
Imputed as failure for CC	4.90
Aneurysm Occlusion	
Complete	53.85
Residual Neck	30.77
Residual Aneurysm	15.38
Imputed as Failure for Primary Effectiveness	4.90
Parent Vessel Stenosis	
None	89.51
$\leq 50\%$	4.90
> 50%	0.70
Imputed as Failure for Primary Effectiveness	4.90
Adjunctive Device (Imputed as Failure)	1.40
Failure to Implant (Imputed as Failure)	1.40
Retreatment of Index Aneurysm (Imputed as Failure)	2.10
Recurrent Subarachnoid Hemorrhage	0.00
N=143 subjects, which is the total number of subjects w month imaging data in the Completed Cases (CC) popu	

### Primary effectiveness was achieved in 54.77% of ITT subjects.

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- 8 subjects had vessel stenosis of less then or equal to 50%
- 3 subjects received retreatment and were imputed as failures
  - An addition 5 subjects had retreatment but remained angiographical not completely occluded.

The Panel will be asked to consider the totality of the effectiveness data presented regarding whether the results support the reasonable assurance of effectiveness of the WEB device in the treatment of wide-neck bifurcation intracranial aneurysm studied in the WEB-IT study. The Panel should discuss any additional considerations in the effectiveness results compared to the performance goal of 35% for the primary effectiveness endpoint considering alternative available treatment modalities for the proposed patient population.

# Effectiveness Results – Percent Occlusion

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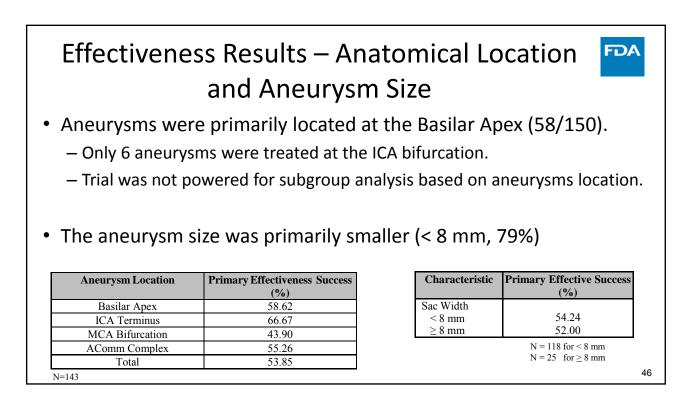


- The rate of complete occlusion decreased from 6 months to 12 months.
  - 87 subjects versus 81 subjects
- The number of subjects with a residual aneurysm neck Increased from 6 months to 12 months.
  - 35 subjects versus 44 subjects

v 151t	Complete Occusion	ICSIGUAT FICCK	Acsidual Aneur ysin
	%	%	%
6 Months	61.70	24.82	13.48
12 Months	57.86	31.43	10.71
adjunct devices bes being counted as a	ts with occlusion at six mont ides balloons during the pro- success. nd N=140 at 12 months		

Complete Occlusion Desiduel Neek Desiduel Anourysm

Population	Rate of Regrowth or Recanalization at 12 months
	%
Completed Cases	12.59
regrowth. None of these 18 s effectiveness endpoint succe	
N=143	



# Duestions regarding retreatment options 5.6% of the CC population (8 subjects of the 143 CC cases) underwent or had planned retreatment during the 12 month study. Additional retreatments have occurred outside of the study 12 month window for which the panel should also consider in its deliberations. Ability to retreatment may be a concern with this device. Patient population (wide-neck bifurcation aneurysms) presents challenges for treatment with stents or flow diverters. Device shape reduces the ability to retreat with embolic coils as the coils may not be stable in the aneurysm neck. The panel will be asked to consider retreatment as part of the benefit risk determination.

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# Technical Success using the WEB Device

- Technical success was observed in 98.67% of subjects in the ITT population.
- Adjunctive Devices were used in a total of 7 cases.
  - 5 subjects were treated using an adjunctive balloon (acceptable under the protocol)
  - 2 subjects had implanted adjunctive devices (stents).
- Subjects with implantable adjunctive devices were considered failures with respect to the primary effectiveness outcome.
- Almost 30% of devices inserted were not implanted, with the most common reason being improper size.

Event	%
Technical Success <sup>a</sup> (N=150)	98.67
Technical Success <sup>b</sup> (N=150)	97.33
Adjunctive Devices Used <sup>c</sup> (N=148)	4.73
Balloon (Acceptable under Protocol)	3.38
Coils (Unacceptable under Protocol)	0.00
Stent (Unacceptable under Protocol)	1.35
Flow Diverter (Unacceptable under Protocol)	0.00

<sup>a</sup> Successful implantation of the WEB device during the index procedure.

b Successful implantation of the WEB device with implantable adjunctive device use during the index procedure as failures.

 $^{\rm C}$  Statistics computed for only cases where the WEB device was implanted during the index procedure (148 case)

Note: All 95% CIs presented in this table are unadjusted.

Disposition	%
Inserted	100
Not Implanted Reason	29.86
Improper Size	88.88
Other	11.11
Implanted	70.14
N = 211	

# **Clinical Data Summary**

- The WEB-IT trial enrolled 150 intracranial bifurcation aneurysms.
- The primary effectiveness success was observed in 54.77% of subjects.
  - The lower bound 90% confidence interval resulted in primary effective rate of 46.63%
  - Occlusion was evaluated using the novel WEB Occlusion Scale (WOS).
- The primary safety analysis looked at major stroke (NIHSS > 4 at 7 days) and death.
  - There was only 1 primary safety failure (major stroke) within 1 years.
  - 4 Subject deaths were reported greater then 1 year post treatment.
  - 12 strokes (8.0%) in 11 (7.3%) patients, where 11 were non-debilitating strokes and was 1 a debilitating stroke reported within 1 year post treatment.

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# Presentation summary areas for discussion

Based on the information provided in the executive summary and today's presentation, FDA would like the panel to consider and comment on the following:

- The proposed indications for use.
- Appropriateness of MRA for longer term follow-up.
- Primary safety endpoint definition and related analyses.
- Appropriateness of the WEB Occlusion Scale (WOS).
- Rate of all neurological deaths or ischemic events observed.
- The totality of the effectiveness data presented for the intended population.



