

# CDRH's Expedited Access PMA (EAP) Program. What is Adjudication's Role?

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Edwards Lifesciences



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**Can we speed approval of devices with less pre-market data but with enriched post-market data and what is adjudication's role ?**



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**That Depends...**



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## What does Adjudication do well?

- Relatedness to device/procedure
- Determination of AE occurrence with complex definitions
  - AKI, Vascular injury, bleeding
- Classification of Major endpoints
  - Death – CV death
  - Rehospitalization – complications or CV
- Success of composite endpoints
  - composite of multiple data sources
  - Are determined through duration
- Interpretable data
  - Imaging, Echo, CT

## And not so well?

- Subjective descriptions of AE
  - 1 L of CT output serous or blood with clots
- How well did the device perform
  - Are there usability issues
- Patient Centric endpoints
  - Satisfaction with outcome
  - Quality of life after procedure
- Adjudication may not impact outcomes
  - Heavy use of resources
    - Pogue et.al.

**Adjudication is not a panacea to  
quality data**



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# Adjudication

May be currently seen as a panacea to quality data collection and does increase specificity of analyses but sensitivity is less than ideal

## WHY

- Accurate data collection begins with the site and the investigator
- Ascertainment bias
- Adjudication can find unidentified events when chartered to look - source documents
- Charters are the CEC drivers and take precedence over the protocol
- Analyses run into problems later when charters and protocols or SAP not aligned

# Adjudication requires Quality Assurance review



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# Quality

In reviewing data, there is a realization of degree of human error and subjective interpretation that is inherent in device trials that produces data that is the best approximation of safety and effectiveness in regulatory submissions

## WHAT

- Quality assurance review by the adjudicating body
  - Reviewer reliability, learning over time, number of disagreements
- QA program by the sponsor to detect problems
  - are the charter definitions being interpreted as intended
  - Reproducibility of adjudication
  - Site quality issues with device performance



**Trials can be shortened with enriched adjudicated data long term**



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## Enriched data

Can we turn 2 year trials into 1 year, and can we turn 1 year trials into 30 day studies by providing longer term enriched quality data?

### HOW? MORE FOCUSED USE OF ADJUDICATION

- Adjudication of selective endpoints that answer remaining questions from a shorter trial
- Focused use of resources for producing quality data from sites
- Requires long term commitment and support
  - i.e. echo lost to follow up
  - use resources to get local imaging centers of excellence that all studies can use
- Pre and Post market balance also have to balance cost and sites resources

# Closing remarks



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## Challenges

We here today, Industry, Academia and Industry, are brought together by our desire to bring life saving and transformative technology quickly and safely to patients lives

Whether it's the EAP or other pathways through the PMA to market  
There is a call to action to define best practices for adjudication so that  
Industry, investigators and regulators have a blueprint to build efficient and less burdensome trials



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## **BLEEDING DEFINITIONS**

	GUSTO severe	TIMI major	TIMI minor	IS m
Fatal	+	+		
Intra cranial	+	+		
Critical organ				
Non-overt (Hb↓)			> 4	
Overt (Hb↓ mg%)		> 5	> 3	>
With intervention	+*		Transfusion:	

+\* hemodynamic compro

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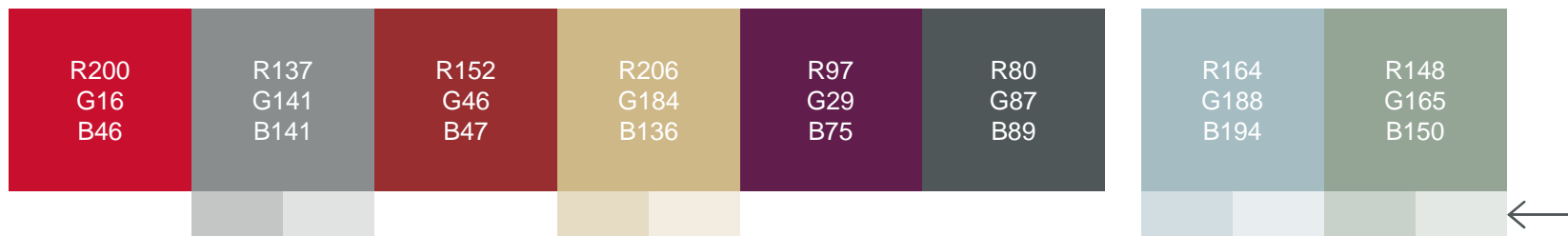
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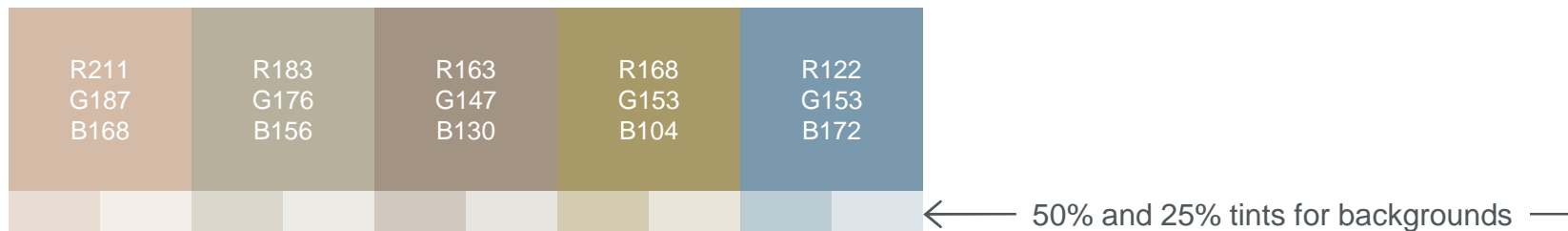
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Our “look” is red and titanium gray. For charts and graphics, though, these eight colors are built into the PowerPoint color palette\*. The first six are “accent” colors that PowerPoint will automatically use in charts and graphics (see examples on following slides). The last two can be selected from the palette, if needed.



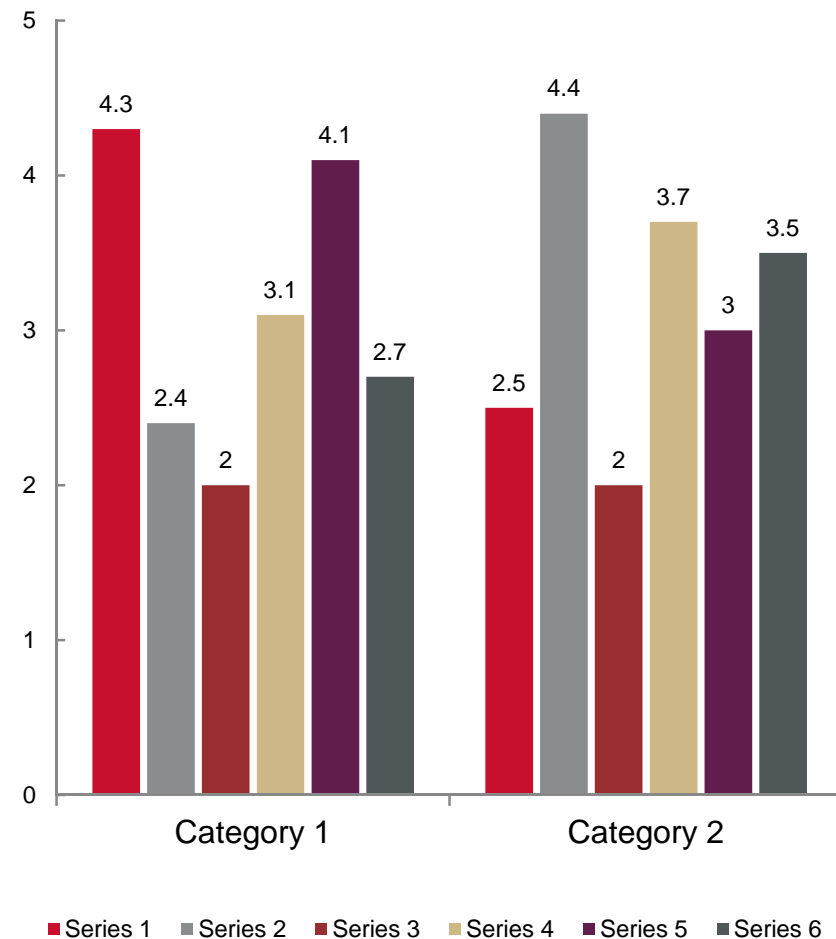
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\*The RGB color formulas in this template have been specially adjusted for PowerPoint.

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- Text sizes and levels are the same as one-column slides.
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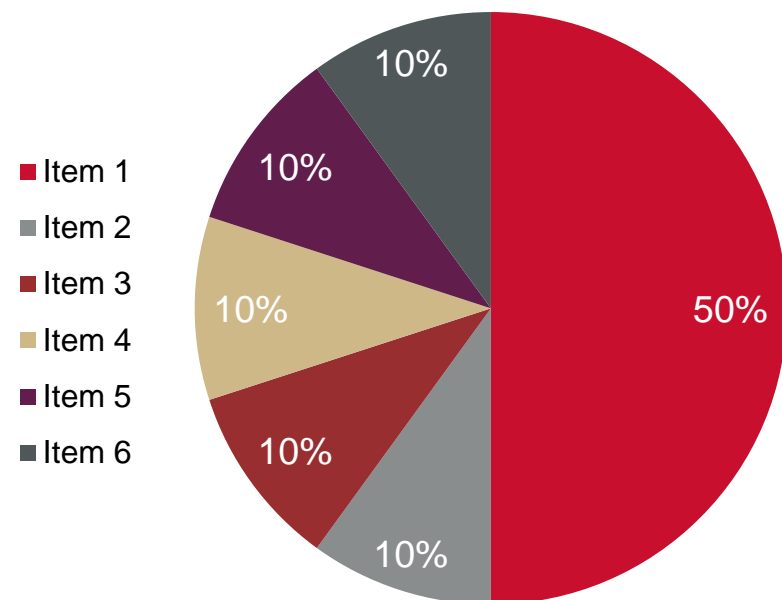
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- Always use approved colors.
- Keep charts and graphics simple.
- Avoid distracting effects.

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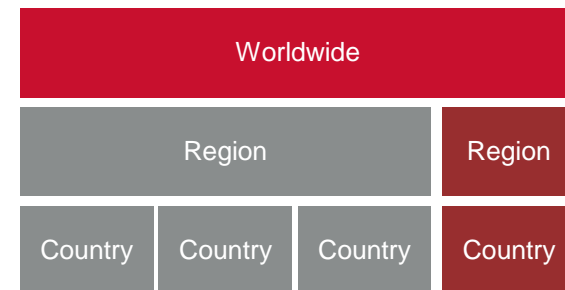
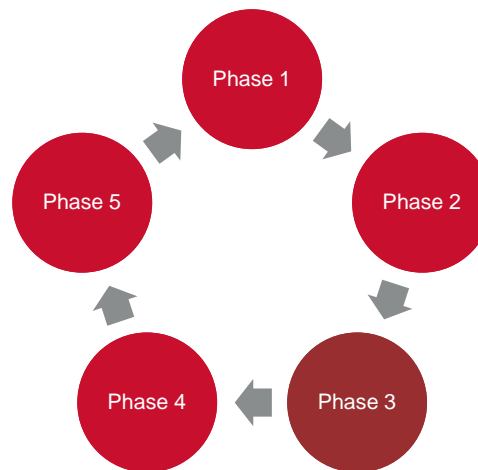
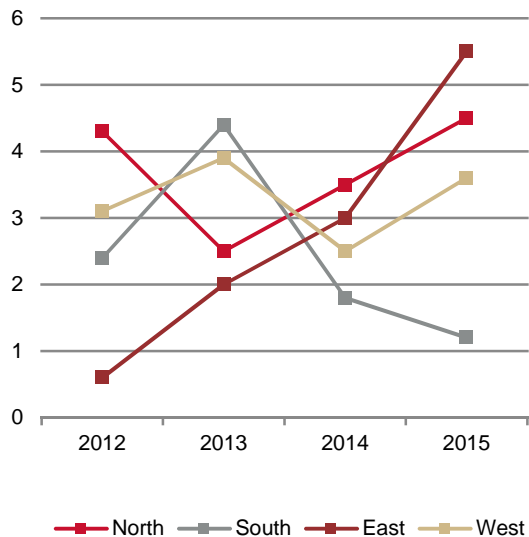
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Row 2	456	789	123
Row 3	789	123	456
<b>Total</b>	<b>123</b>	<b>456</b>	<b>789</b>

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