



Use Experience of Real World Evidence in the Actual Review

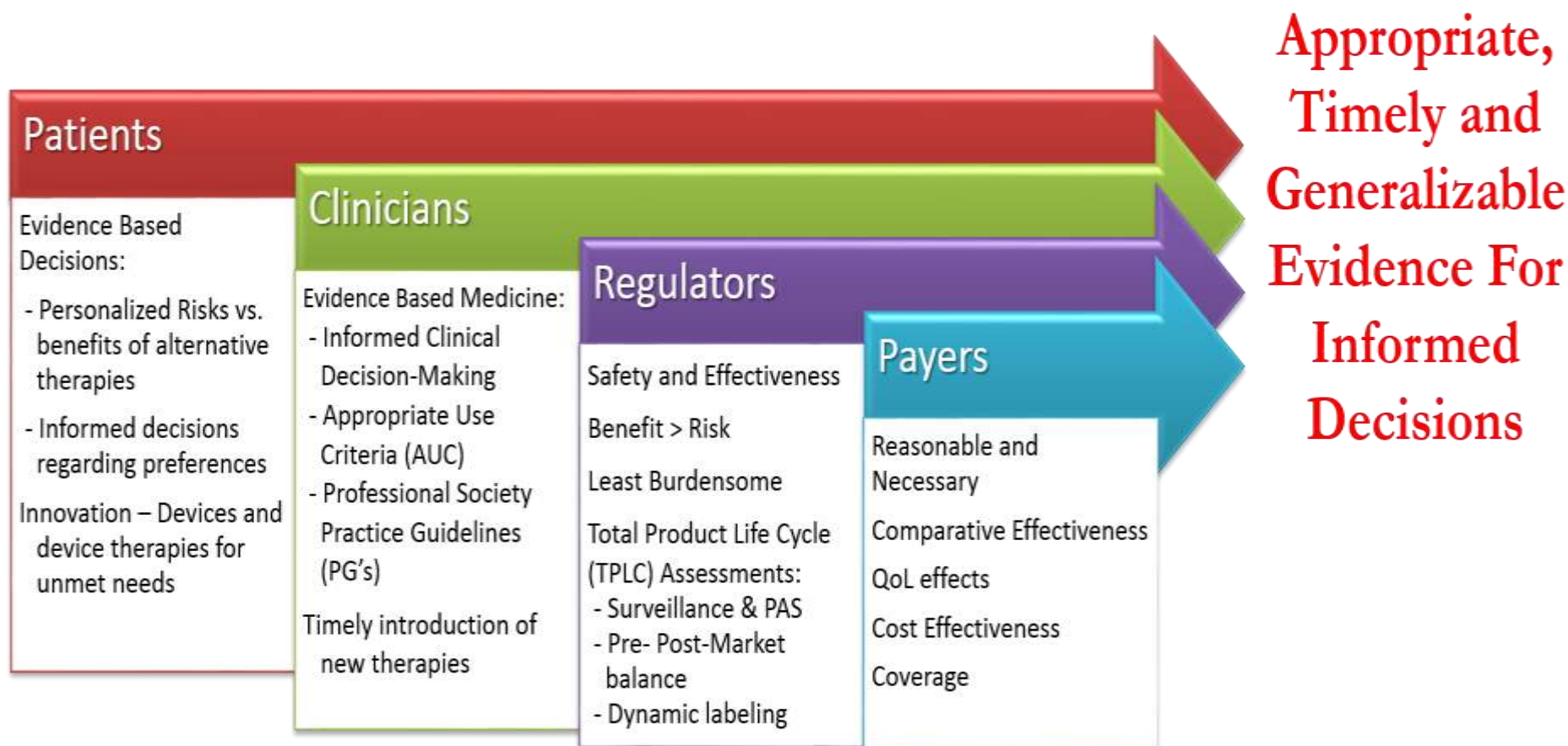
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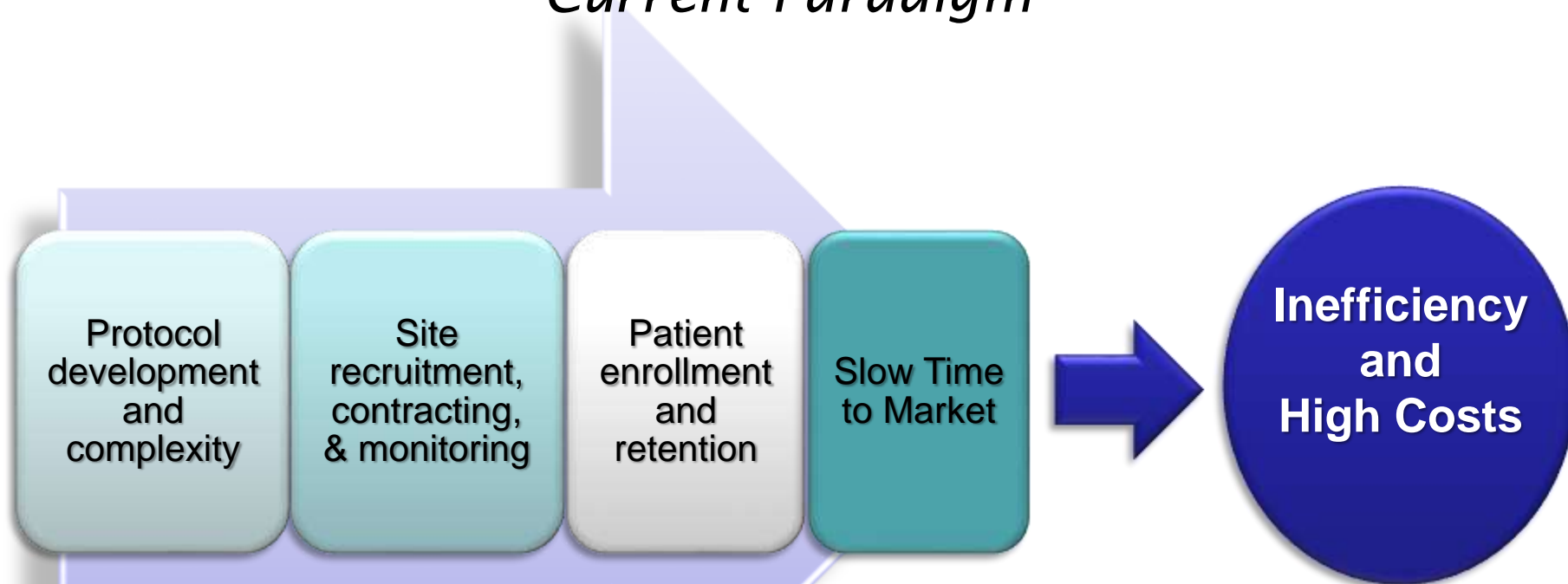
Clinical Evidence Generation

Current Paradigm



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Current Paradigm



Increasingly becoming the primary source for clinical evidence generation:

Industry goals may not always align with clinical needs

Regulatory Considerations for Using Real-World Evidence

- Data source, relevance, reliability, quality, completeness, bias
- Demonstrate reasonable assurance of safety & effectiveness

Current Considerations on Real-World Evidence Use in FDA Regulatory Submissions

Examples and decision-making from the Center for Devices and Radiological Health's Peripheral Interventional Devices Branch.

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When is Use of Real-World Evidence Appropriate

- Expansions of Indications
 - Increased indicated lesion length for the Zilver DES and Lutonix DCB
 - Expanded lesion type to include in-stent restenosis for In.Pact Admiral DCB and Lutonix DCB
- Post-approval surveillance
 - Evaluate longer term outcomes
 - Evaluate outcomes in US patients

Pathway for Success

- Pre-Submission to discuss a prospective analysis plan
 - Identify analysis type (e.g., propensity matching)
 - Identify confounders/covariates, appropriate endpoints
 - Determine methods to reduce bias
 - Build confidence in the SAP
- Follow the plan
- Submit supplement





Thank you!