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Early Approval-Novel Medical Devices

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Background



LimFlow Focus – Limb Salvage for CLTI Patients



19 average hospital admissions per year

\$800k in per patient direct healthcare cost

Up to 10% die before discharge Up to 60% die at 1 year

ischemia-related amputation in US&EU



Every

2 MINUTES,

a leg is lost to

Why Current Therapies Fail

The distribution system within the foot of many CLTI patient is irreparably damaged

- High prevalence of medial artery calcification and small artery disease
- Significant comorbidities (Diabetes mellitus / end stage renal disease)
- Presence of a wound changes perfusion requirements
- Flow to ankle ≠ wound healing



Deep Venous Arterialization – Alternative Perfusion Pathway





LimFlow pDVA

- Leverage healthier veins as a conduit
- Create new routes to perfuse tissue





Novel Therapy Challenges



Population

Large unmet need in patients with no surgical or endovascular treatment options

Challenge to identify / characterize a rarely studied population

- High rate of comorbidities
- Target population often excluded from traditional device studies
- Professional Society guidelines not widely understood (Wifi) or influenced by age or specialty (Rutherford)
- Support from Key Opinion Leaders crucial



Study Design

RCT vs Single-Arm

- Ethical challenges in a "no option" population
- Performance Goal challenge to establish with literature

Statistical Approaches

- Frequentist
- Bayesian adaptive

Clinical endpoint vs Surrogate

Amputation Free Survival vs Patency (historically used for stents)





Establishing which criteria are important for a population that is rarely studied

Definition of "no option" the most contentious topic with FDA (surgical options) & PMDA (interventional options)

Accounting for potential geographical considerations

- Dialysis patients typically excluded from PAD studies
- Target population in Japan almost universally on dialysis
- The typical Japanese dialysis patient has a much greater life expectancy
- I/E used to identify US dialysis patients that mimic Japan



Regulator Interaction



Pre-Submissions: Valuable Tool

- Early Communication
- Take advantage of the pre-submission process to maximize early communication, may need to help educate FDA personnel
 - LimFlow needed several pre-submissions due to the complexity of our system (4 devices) and the uniqueness of our therapy
 - Multiple pre-submissions to review in vivo, in vitro, biocompatibility, etc. testing strategies
 - Even with multiple meetings there can still be challenges in key areas like animal testing, biocompatibility, and study design

Breakthrough Device Program

- Great program for new technologies, facilitates greater communication with FDA
- Very helpful to small companies, like LimFlow
- Beneficial in addressing some aspects of reimbursement with future payors
- Highly recommended if your technology qualifies



Early Feasibility Studies

Europe is no longer the preferred option for early clinical work

 New Medical Device Regulations (MDR) and MEDDEV guidance make clinical work in the EU very burdensome

FDA has done a great job addressing physician and industry feedback

- EFS viewed by many start-ups as the preferred pathway to collect early clinical evidence
- Verification and validation requirements remain, but in general FDA has been reasonable regarding data needs to initiate an EFS
- Allows for early data collection to help define pivotal study, but try to size appropriately so you can move quickly to pivotal

Harmonization by Doing – Lessons Learned

Great option to allow for potential entry into Japan without doing a stand-alone study or relying solely on foreign data

Key learnings:

- Like FDA, interact with PMDA as much as possible, LimFlow was quite far along with our FDA interactions before considering Japan
- Support from physicians in Japan to help champion your therapy is important, they can also help identify potential population differences that could impact your study design
- FDA is available to support, should it be needed
- Find a good in-country CRO and do not underestimate translation costs and timing
- The FDA/PMDA testing requirements are not identical (both agencies have been flexible in deferring some testing to a commercial application)

Current Challenges



COVID-19

The impact of COVID-19 on clinical study outcomes is not yet known

The impact of COVID-19 on study enrollment is clear

 Some hospitals stop/pause studies due to being overwhelmed with COVID patients or have a lack of staffing to support trials

Consultation meetings performed remotely

 Challenge to hold such important meetings via teleconference considering translation needs, time zone differences, etc.

Travel Restrictions

Inability to travel and support cases



Thank you!

