

Members Meeting September 27, 2022



Welcome and Agenda

- I. Welcome
- II. Deep Dive into the Tool Chest Update from the Tools Workgroup
 - A. Review of the WEF-CEP Endpoints and focus of the Tools Workgroup
 - B. Goal of identifying validated tools
 - C. Devices for measurement
 - D. Quality of Life measurements
 - E. FDA input (Dev Verma)
 - F. Q&A
- III. Brief update of other workgroups
 - A.RWE
 - B. Gaps





How We Got Here

- Years of successfully working w/ the FDA on the WC endpoints project (WEF-CEP initiative)
- Extensive research effort, three publications^{1,2,3} and a community outreach program... Recommended new endpoints

FDA asked us to consider developing a Wound Care Collaborative Community (WCCC)

WCCC Charter developed & accepted by the FDA

^{1.} Driver VR, Gould LJ, Dotson P, et al. Identification and content validation of wound therapy clinical endpoints relevant to clinical practice and patient values for FDA approval. Part 1. Wound Rep Regen 2017;25 (3):454–465.

2. Driver VR, Gould LL, Dotson P, Allen LL, Carter MI, Bolton LL, Evidence Supporting Wound Care Endpoints Relevant to Clinical Practice and Patients' Lives Part 2. Wound Rep.

Driver VR, Gould LJ, Dotson P, Allen LL, Carter MJ, Bolton LL. Evidence Supporting Wound Care Endpoints Relevant to Clinical Practice and Patients' Lives. Part 2. Wound Rep. Repen 2019;27(1):80-89.

^{3.} Gould LJ, Liu J, Wan R, Carter MJ, Dotson M, Wan R, Driver VR. Evidence supporting wound care end points relevant to clinical practice and patients' lives. Part 3: The Patient Survey. Wound Rep Regen 2020;1-10.



Organized into Work Groups

Formed Work
Groups w/
leaders from
Industry,
Clinical
Practice, and
Research

Tools
Real World
Data
Gaps



Where WEF-CEP Left Off

15 Evidence-based Endpoints

- Time to heal (FDA accepted primary endpoint)
- Percent area reduction (FDA accepted secondary endpoint)
- Reduced infection (FDA accepted secondary endpoint)
- Reduced pain (FDA accepted secondary endpoint)
- Reduced recurrence (FDA accepted secondary endpoint)
- Increased physical function/ ambulation (FDA accepted secondary endpoint)
- Amputation reduction
- Reduced analgesia use
- Reduced depression
- Reduced social isolation
- Percent volume reduced
- Reduced odor
- Cost effectiveness
- Reduced cost of treatment
- Reduced bioburden

6 New Primary Endpoints

Recommended and agreed upon by the the FDA (need to be validated with a specific measurement tool)

- Percent area reduction (PAR)
- Reduced infection
- Reduced pain / reduced analgesia use
- Increased physical function and ambulation
- Quality of Life
- Cost effectiveness

Secondary Endpoints Recommended to the FDA

- Reduced recurrence
- Percent volume reduction (PVR) pending primary endpoint w/ validated tools
- Reduced Bioburden pending primary endpoint w/ validated tools
- Reduced cost of treatment



Focus - Tools Work Group

- New Primary Endpoints
 Recommended and agreed upon by the the FDA
 (Validate specific measurement tools)
 - 1. Percent area reduction (PAR) & Percent volume reduction (PVR)
 - 2. Reduced pain / reduced analgesia use
 - 3. Combined Increased physical function and ambulation & Quality of Life



TWG Where We Are Now

- Leaders:
 - Dr. Oscar Alvarez: Chair (research)
 - Dr. Tod Brindle: Co-Chair (industry)
 - Dr. Rob Snyder: Co-Chair (clinical)
- FDA Advisors/Participants:
 - Dr. Dev Verma, MD
 - Dr. Jessica Mavadia-Shukla, PhD (MDDT)

TWG Team Members

WCCC Tools Work Group Goals and Objectives

Goal: Identify evidence that clinically validated technology/methodology exists to accurately and reproducibly support a Clinical Trial Primary Endpoint that combines improved wound healing (Percent Area Reduction) with improved quality of life as evidenced by Patient Reported Outcomes

Objectives:

- 1. Clarify core terminology and best practices for the evaluation of wound measurement/monitoring technologies
- 2. Gather and evaluate validation information regarding wound measurement and evaluation methods and devices
- 3. Gather and evaluate validation information regarding Patient Centric, Patient Reported Outcome (PRO) tools as they relate to the chronic wound care patient
- 4. Identify existing technology with existing, validated capabilities

Moving From Current Siloed Practices To One Universal Best Practice

Adaptation of V3 multi-step process that includes relevant expertise at each stage, as well as interdisciplinary collaboration throughout*

- **1. Verification** entails a systematic evaluation of the hardware by the developers/manufacturers.
- 2. Analytical Validation occurs at the intersection of engineering and clinical expertise. This step translates the evaluation procedure for the device from the bench to in vivo. Does the device/method reliably and accurately measure what is intended, is scientifically plausible, and is reasonably likely to predict the outcome of interest?
- **3. Clinical Validation** demonstrates that the device/method acceptably identifies, measures, or predicts the clinical, biological, physical, functional state, or experience in the defined context of use (which includes the definition of the wound and population).

*Goldsack, JC, Coravos, A, Bakker, JP, et al: Verification, analytical validation, and clinical validation (V3): the foundation of determining fit-for-purpose for Biometric Monitoring Technologies (BioMeTs). npj Digital Medicine (2020) 3:55; https://doi.org/10.1038/s41746-020-0260-4

Ongoing Clinical Validation Imaging Industry Consortium

Monique Rennie, PhD: VP Medical Affairs Moleculight, Inc

Jeffrey Niezgoda, MD: CMO Kent Imaging, Inc

PRO Tool Development

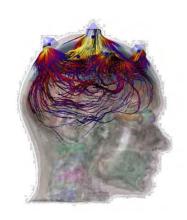
■ Andrea L. Pusic MD: Chief of the Division of Plastic and Reconstructive Surgery, Director of the Patient-Reported Outcomes, Value & Experience (PROVE) Center and a Professor of Surgery at Harvard Medical School

❖ Face Q, Wound Q and the MDDT Process









Medical Device Development Tools (MDDT) Program

Hilda F. Scharen, M.Sc. CAPT, USPHS

Director, Medical Device Development Tools (MDDT)

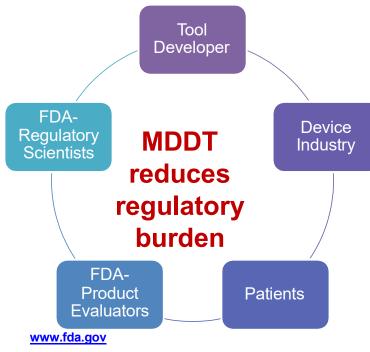
Center for Devices and Radiological Health U.S. Food and Drug Administration

www.fda.gov



Medical Device Development Tool Program





Benefit of Qualifying Tools

- Fosters innovation
- Encourages collaboration
- Reduces resource expenditure
- Qualified MDDT applied in multiple device submissions
- Promotes efficiency in CDRH regulatory review resources
- Minimizes uncertainty in regulatory review process



What Is An MDDT?

- Medical Device Development Tool (MDDT) a method, material, or measurement used to assess the effectiveness, safety, or performance of a medical device
 - A MDDT is scientifically validated and qualified for a specific Context Of Use (COU)
 - ➤ COU describes the way the MDDT should be used, purpose in device evaluation and/or regulatory submission, and specific output/measure from the tool
 - Qualification is a FDA conclusion that within the COU a MDDT can be relied upon to have a specific interpretation and application in medical device development and regulatory review
 - ➤ CDRHreviewers should accept the MDDT outcomes within the qualified context of use (COU)) without the need to reconfirm the suitability and utility of the MDDT when used in a regulatory submission



MDDT Types

COA

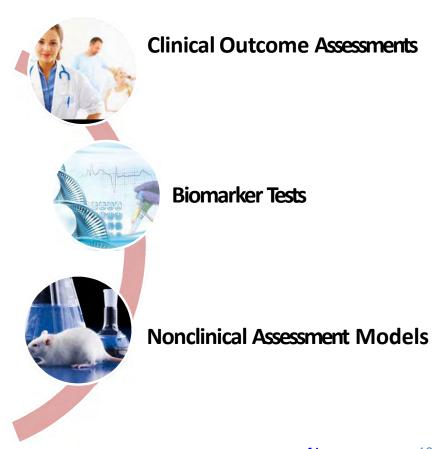
- Patient selection for clinical studies
- Clinical study outcomes

BT

- Objective measure of biologic process or response to an intervention
- Patient selection
- Predict or identify outcomes

NAM

- Models (computational and animal) to measure/predict a parameter of interest
- Reduce / Replace animal testing
- Reduce test duration or sample size



MDDT Program Creation







- Before creation of MDDT program...tools used by developers were evaluated on case-bycase basis — for each medical device submission
- Now w/ creation of the voluntary MDDT Program we are creating both efficiency & transparency in the review process for submitters and reviewers:
 - Qualifying tools for a specific use, FDA <u>facilitates</u> application for multiple medical device submissions and manufacturers
 - Qualified MDDT used in a regulatory submission can be <u>relied upon</u> in device evaluation and to support regulatory decision-making **without the need to reconfirm** the suitability and utility of the MDDT tool.
 - Submitters have assurance that a qualified tool used within its COU will be accepted by FDA without the need to reconfirm the suitability and utility of the tool.

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MDDT Qualified Tools

Tool Name	Summary - Evidence & Basis for Qualification (SEBQ)	Product Area(s)	Tool Type	
Rubric for Applying CVSS to Medical Devices	Tool description	Cybersecurity	NAM	10/20/2020
BREAST-Q Reconstruction Module	Qualified COU	Plastic Surgery	COA	08/20/2020
Insulin Dosing Systems: Perceptions, Ideas, Reflections, and Expectations (INSPIRE) Questionnaires	Summary evidence to support qualification Brief assessment	Automated Insulin Dosing (AID)	COA	06/24/2020
IMAnalytics with MRIxViP1.5T/3.0T And BCLib	advantages vs. disadvantages Tool developer contact	Active implanted medical devices(AIMDs) Imaging	NAM NAM	12/12/2019 07/10/2019
Tissue Mimicking Material (TMM) for Predinical Acoustic Performance Characterization of High Intensity	information			01, 20, 2020
Therapeutic Ultrasound (HITU) Devices OSIRIX ODE Software Module		Imaging Neuro	NAM BT	07/10/2019 03/12/2019
Minnesota Living with Heart Failure Questionnaire (MLHFQ)		Cardio	COA	03/19/2018
Kansas City Cardiomyopathy Questionnaire (KCCQ)		Cardio	COA	10/19/2017



MDDT Qualification Process

Qualification Phase Proposal Phase The goal of the proposal phase is to The goal of the qualification phase is to determine whether, for a specific context determine if the MDDT is suitable for of use, the tool is qualified based on the qualification through the MDDT program. Those interested in seeking qualification evidence and justifications provided. In should submit a complete **Qualification** this phase the data collected according to **Plan** for collecting & gathering evidence the Qualification Plan is submitted as the for qualification of the tool a description Full Qualification Package and is reviewed of the MDDT, and context of use. for qualification decision.

Preliminary List of Tools for QoL Increased physical function/ ambulation

Nottingham Health Profile

SF-36

6 Minute-Walk Test

Post-surgical Walking Speed Lymphedema Life Impact Scale (LLIS)⁴ ABC scale

BERG Balance Scale

Gait Speed test

Five Times Sit To Stand

TUG (timed get up and go) test Vestibular Screening

Oswestry score

Spinal Cord Injury Functional Index

WOUND-Q²⁰ (newest)

Wound QOL

Preliminary List of Tools for QoL Odor and Depression

Odor reduction

10 cm Visual Analog Scale (VAS)⁷

Likert scale

Reduced depression

WHO-5 Well-being Index

PHQ-9

CES-D

HADS (Hospital Anxiety and Depression Scale)

Lymphedema Life Impact Scale (LLIS)⁴ Beck Depression Inventory,

Wound-QoL

Demoralization scale (DS)

Preliminary List of Tools for QoL Reduced social isolation

WOUND-Q ²⁰ (newest)	
Wound QOL	
Nottingham Health Profile Lymphedema Life Impact Scale (LLIS) ⁴ SF-36	
VEINES_QOL/ Sym.	
PAID	
Diabetes Distress Scale	
CWIS (Cardiff Wound Impact Schedule) -VU & DFU	
TLQ-CVI	
FLOA	
Freiburg Life Questionnaire Assessment SF-12	
SF-MPQ	
SRT	
NHP	
Charing Cross VU Questionnaire	
WHO-5 Well-being Index	

GHQ-12- 12-item General Health Questionnaire

For Panel Discussion: Challenges & Opportunities

Challenges

- Difficulty identifying all the wound measurement devices, apps
- Devices for wound measurement are regulated through FDA 510(k) process
- Fragmented wound care providers, caregivers and lack standardization
- Abundance of overlapping competing devices
- Lack of standardized RCTs complicate validation
- Need for consortia of stakeholders to better define device validation process

Opportunities

- FDA/CMS acceptance of a hybrid primary endpoint (e.g., PAR & PRO)
- Recognition of "chronic wound" as a disease process
- Advance reproducibility and robustness of research and clinical outcomes
- Trigger a greater involvement of chronic wound patients in their care
- Promote advancement of digital medicine and wearable devices

Mahmoudi M, Gould LJ. Chronic Wound Care Mgmt & Res 2020;7:27-36.