FDA Executive Summary

Prepared for the March 24, 2015 meeting of the FDA's Pediatric Advisory Committee

> H120005 Liposorber® LA-15 System

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I. INTRODUCTION

In accordance with the Pediatric Medical Device Safety and Improvement Act this review provides a safety update based on the postmarket experience with the use of the Liposorber® LA-15 System in pediatric patients for the treatment of nephrotic syndrome associated with primary focal segmental glomerulosclerosis since approval in 2013. The Liposorber LA-15 System, a blood processing system that is used outside the body, includes disposable components and a control/monitor unit. The device works by removing certain lipoproteins from the patient's blood. The patient's blood is first passed through a plasma filter where the blood cells are separated from plasma (the liquid component of the blood). The plasma is then further passed through two adsorption columns, which are packed with a gel designed to capture the lipoproteins in the blood. The blood cells and the treated plasma are then returned to the patient via the blood return line.

The purpose of this review is to provide the Pediatric Advisory Committee with postmarket safety data, so the committee can advise the Food and Drug Administration (FDA) on potential safety concerns associated with the use of this device in children. This executive summary will include summaries of the premarket clinical study, postmarket follow-up of the premarket clinical study, the peer-reviewed literature associated with the device, and postmarket medical device reporting (MDR) for adverse events.

II. INDICATIONS FOR USE

The Liposorber[®] LA-15 System is indicated for use in the treatment of pediatric patients with nephrotic syndrome associated with primary focal segmental glomerulosclerosis, when

- Standard treatment options, including corticosteroid and/or calcineurin inhibitors treatments, are unsuccessful or not well tolerated, and the patient has a GFR $\ge 60 \text{ ml/min}/1.73\text{m}^2$, or
- The patient is post renal transplantation.

III. BRIEF DEVICE DESCRIPTION

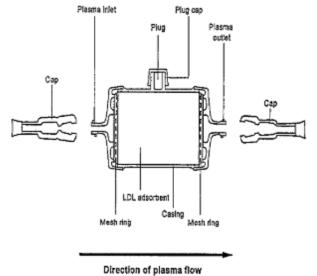
The Liposorber® LA-15 System is an integrated extracorporeal blood processing system that includes disposable components and a control/monitor unit.

The components of the device are identical in material and design to the device currently approved via PMA P910018 (for subgroups of patients with familial hypercholesterolemia (FH)) and its supplements. The Liposorber[®] LA-15 System consists of four major components: the Sulflux KP-05 Plasma Separator, Liposorber[®] LA-15 Adsorption Columns, NK-M3R Tubing Set, and MA-03 Machine.

- 1. The Sulflux KP-05 Plasma Separator (approved on 6/27/2007 Supplement 11) separates the plasma from whole blood. This component is comprised of porous hollow fibers made of polyethylene coated with an ethylene vinyl alcohol copolymer enclosed in a polycarbonate housing.
- 2. The Liposorber LA-15 Adsorption Columns (approved in original PMA 1996) (Table 1) are disposable. They adsorb apolipoprotein B-containing lipoproteins from a patient's

plasma as it passes through the columns. The casing of the columns is polycarbonate. Each column (they are used in pairs for a treatment) contains a microporous hydrophilic gel (with particle size of $64 - 160 \mu m$) composed of 150 ml dextran sulfate cellulose (DSC) beads soaked in 0.04-0.08% (w/v) sodium citrate/citric acid solution.

Figure 1 Schematic of Liposorber LA-15 Adsorption Column



- The NK-M3R Tubing Set (approved on 3/31/2009 Supplement 12 and 6/18/2010 Supplement 13) set is designed specifically for the Liposorber LA-15 System. The tubing is comprised primarily of polyvinyl chloride, but also contains polycarbonate, polypropylene, polyethersulfone, polytetrafluoroethylene, polyester, acrylic resin, isoprene rubber, and polyolefin elastomer. It is composed of the following:
 - Blood withdrawal line
 - Regeneration line
 - Plasma line
 - Blood return line
 - A set of five (5) connection lines (for connection to solution bags)
 - Membrane filter.
- 4. The MA-03 Machine (approved 3/31/2009 Supplement 12) is a computer-controlled unit that controls the entire apheresis procedure.

While the Liposorber[®] LA-15 System (P910018) is labeled for either weekly or every other week use when used to treat familial hypercholesterolemia (FH) (depending on the patient's LDL-C levels), in the HDE, the Liposorber (H120005) is indicated for up to 12 uses in 3 months for treatment of focal segmental glomerulosclerosis (FSGS) (twice weekly for 3 weeks, then weekly for 6 weeks).

Method of Operation:

The method of operation for the device for its pediatric indication is identical to the method of operation for the original indication (P910018), which is to treat hypercholesterolemia in certain high risk patient populations. The method of operation is described below, and Figure 2 is the schematic of this operation.

- Blood is withdrawn from the patient's arm via venous access.
- The blood is combined with heparin and pumped at a steady flow rate through the NK-M3R Tubing Set into the inlet port of the Sulflux KP-05 Plasma Separator to separate plasma from the cellular components of the blood.
- Plasma exits from the plasma outlet and the remaining blood, including red and white blood cells and platelets, exit from the blood outlet.
- The cell-free plasma is pumped into one of the two Liposorber LA-15 Adsorption Columns where apolipoprotein B-containing lipoproteins are adsorbed to the cellulose beads and removed from the plasma. The dextran sulfate cellulose beads have a strong affinity for apolipoprotein B-containing lipoproteins.
- Filtered plasma exits the column, passes through a membrane filter to ensure particles from the column do not enter the system, and is recombined with the cellular elements originally exiting the plasma separator.
- This recombined blood and plasma flow through a built-in blood warmer (part of the MA-03 Machine) and is returned to the patient via a second venous access.

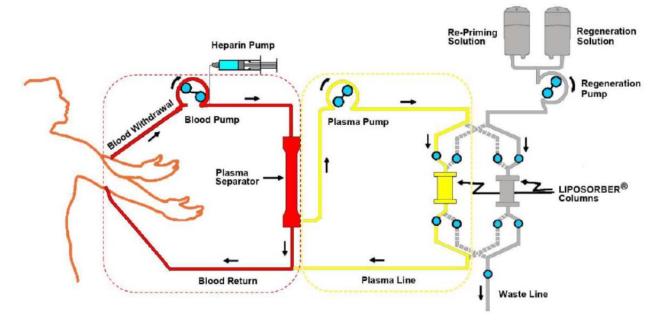


Figure 2 Schematic of Liposorber Operation

Apheresis occurs on a continual basis even when a column has been exhausted, because the system regenerates one column while the other one is in use. When one column has completed an adsorption cycle, the computer-regulated machine automatically switches the plasma flow to the other column to continue adsorption. Simultaneously, the plasma remaining in the first column is returned to the patient. The first column is then regenerated using 5% Sodium Chloride Injection USP. Once the elution is completed and flushed through the waste lines to a waste bag, the column is reprimed and ready for the next cycle of adsorption, allowing continuous apheresis. No additional fluids are given to the patient during these column switch overs and only the filtered plasma is returned. The patient treatment takes about 2-3 hours and is performed at a medical facility.

The total extracorporeal volume of the circuit used with a Liposorber LA-15 Adsorption Column is 404 mL, which includes both plasma and whole blood together. The total volume of whole blood in the circuit is 160 mL. The total volume of additional plasma in the circuit is 244 mL. The 244 mL plasma portion of the circuit is drawn from and returned to the blood portion of the circuit. The entire system is primed with heparinized fluid before use, so the patient does not experience significant volume loss.

IV. REGULATORY HISTORY

The Liposorber LA-15 System received designation as a Humanitarian Use Device (HUD Designation) on September 28, 2012, and on October 10, 2013, the HDE application was approved by the Center for Devices and Radiological Health (CDRH) of the Food and Drug Administration.

V. PREMARKET DATA: CLINICAL INVESTIGATION

Pediatric focal segmental glomerulosclerosis (FSGS) is a progressive and aggressive disease of the kidney that frequently leads to end stage renal disease (ESRD) in children. As the disease progresses, the filtering units of the kidney (called glomeruli) become sclerotic. In addition, other areas of the kidney (tubules, interstitium) develop inflammation and sclerosis, and some tubules, which carry fluid within the kidney and absorb nutrients, are permanently damaged and lost (atrophy). As a result, the ability of the kidneys to filter the blood properly is lost, resulting in poor renal function.

FSGS is a histologic (tissue-based) diagnosis that may have no identifiable cause, in which case it is called primary FSGS. FSGS may also be secondary to another disease (e.g., hypertension, vesicoureteral reflux). The primary form of FSGS is more common among children and young adults, while secondary FSGS is more common in older adults. Regardless, the initial insult is thought to involve damage to the glomerular epithelial cells (podocytes), leading to protein leak, capillary expansion, formation of synechiae, and mesangial matrix proliferation. The primary clinical symptom of FSGS is proteinuria. Other clinical symptoms are secondary to urine protein loss, and include hyperlipidemia, hypoalbuminemia, edema, and hypertension.

Treatment of primary FSGS is principally aimed at reduction of proteinuria. This can be accomplished with the use of drugs that suppress the immune system, including corticosteroids, calcineurin inhibitors, and cytotoxic agents. Other medications that target renin-angiotensin-aldosterone system blockade (e.g., angiotensin converting enzyme inhibitors (ACE) and/or

angiotensin receptor blockers (ARB)) decrease proteinuria and lower blood pressure which can slow the progression of proteinuric kidney diseases like FSGS. Nevertheless, spontaneous remission of primary FSGS is rare and the renal prognosis is poor, with FSGS patients frequently developing ESRD within 3-10 years. FSGS is much more likely to progress to ESRD than any other primary renal disease. For patients with primary FSGS who are refractory to standard treatments, there are generally no alternative options and progression to ESRD and lifelong renal replacement therapy (dialysis, transplant) is inevitable. Moreover, the lifespan of any child who develops ESRD is dramatically reduced, generally being 25-50 years.

The Liposorber[®] LA-15 System is for pediatric patients with primary FSGS only, since treatment of secondary FSGS primarily involves treatment of the underlying cause (e.g., hypertension).

The applicant did not conduct a prospective study regarding the proposed device for the intended populations. Instead, the applicant provided references for several studies of children with FSGS, either before or after renal transplant, who received therapy with the Liposorber[®] LA-15 System. Among the studies provided, all but two (one including patients with FSGS treated with the device prior to transplant, and one including patients with FSGS who received therapy after transplant) involved 1-2 patients. Only the larger studies were considered for assessment of the device for the intended populations.

Pre-transplant FSGS:

For the pre-transplant (FSGS) population, the applicant provided a published study (Hattori et al, 2003) which described the outcomes of eleven (11) children with steroid resistant primary FSGS who were treated unsuccessfully with conventional-dose cyclosporine therapy and showed persistent nephrotic range proteinuria. At the time of treatment with the Liposorber LA-15 System, none of the patients had received a renal transplant ("pre-transplant"). At the start of the 7th apheresis treatment (average number of treatments: 11.5), prednisone was administered at a dose of 1mg/kg/d for 6 weeks, followed by a tapering schedule during subsequent months.

The effectiveness endpoint was the number of patients achieving remission of nephrotic syndrome. Other measures included renal function (i.e., glomerular filtration rate (GFR)), degree of proteinuria, cholesterol level and complications of therapy.

The criteria used to assess clinical response were:

- Remission of nephrotic syndrome (NS)
 - Complete remission: reduction in urinary protein ($< 4 \text{ mg/m}^2/\text{h}$) for 3 consecutive days with normal serum albumin and cholesterol levels, and stable renal function
 - Partial remission: lower urinary protein levels but persistent non-nephrotic proteinuria (protein< 40 mg/m²/h) with normal serum albumin
 - Renal Function (as GFR, in ml/min/1.73m²)
 - Proteinuria (g/m²/day).

Results:

Effectiveness:

- Achievement of remission (defined above) of nephrotic syndrome was observed in 7/11 patients (5 complete and 2 partial).
- Renal function (GFR) for the five (5) patients who achieved complete remission was normal during follow-up (median: 4.4 years, range: 4.0-11.1 years).
- Proteinuria declined in 7/11 patients (as evidenced by remission of nephrotic range proteinuria).

Safety:

Only one patient developed a complication (infection of the indwelling catheter used to receive the therapy).

Conclusion:

The authors suggest that combined LDL-apheresis and prednisone therapy can be a valuable therapeutic option for treating patients with steroid resistant FSGS. They also showed that patients with lower degrees of proteinuria and less advanced changes on renal biopsy prior to Liposorber treatment achieved higher rates of remission, lower levels of proteinuria and better preservation of GFR with therapy.

Post-transplant FSGS:

For the post-transplant FSGS population, the applicant provided a published study (Muso et al, 2007) of 41 patients with refractory FSGS. The study population included a sub-set of 7 patients (not defined but likely all adults) who developed recurrent FSGS after undergoing renal transplantation. The study was intended to evaluate the long-term outcome of LDL apheresis in patients with FSGS.

The criteria used to assess clinical response were:

- Change in lab values (e.g., serum protein, serum albumin, proteinuria) at 1 month after treatment and measured the number of patients achieving remission of nephrotic syndrome at 2 and 5 years after Liposorber treatment
- Remission of nephrotic syndrome (NS)
 - Complete remission
 - Type I incomplete remission: proteinuria negative or < 1.0 g/day and serum albumin > 3.0 g/dL
 - Type II incomplete remission: proteinuria < 3.5 g/day but serum albumin < 3.0 g/dL

Results:

Effectiveness:

- At 1 month after LDL apheresis total serum protein and albumin increased significantly and proteinuria was significantly decreased.
- Remission of nephrotic syndrome was observed in 18/29 patients followed at 2 years (62%).
- Remission of nephrotic syndrome was observed in 13/15 patients followed at 5 years (86%).

The seven post-transplant patients were included in the 41 patients analyzed at 1 month. The authors did not separate out the patients treated before and after transplant. The authors state that the exclusion of the post-transplant patient data did not impact the data trend or significance of the results, indicating that the post-transplant data were similar as a group to the pre-transplant patients in terms of increase in serum protein and albumin and decrease in proteinuria. The authors did not indicate the number of post-transplant patients included in the 2 and 5 year follow-up.

Safety:

The incidence of safety events was not reported.

Conclusion:

The authors conclude that early administration of LDL-apheresis after the onset of nephrotic syndrome associated with FSGS provides a good long-term outcome.

The studies listed above did not comprehensively assess safety of the device in either children or adults with FSGS. However, there was extensive experience and data of safety of the device system in children treated for familial hypercholesterolemia (FH). The agency posited that extrapolation of safety data in children with FH treated with the device system was reasonable since the risks for children with FH was similar to or greater than for children with FSGS. Therefore, an analysis was done to assess the safety of the device in children with FH treated with the Liposorber LA-15 system. Table 1 displays the incidence of various adverse events known to occur with the device system that occurred in children with FH treated with the Liposorber LA-15 system, as reported in two published manuscripts^{1,2}:

Table 1 Incidence of Various Adverse Events Known to Occur in Children with FH	Treated with the
Liposorber LA-15 System	

Adverse Event (Side Effect)	How Often This Happens in Children Treated with the Liposorber LA-15 System for Another Disease (High LDL- Cholesterol) Due to the System Itself	Harm to You
Death	Not reported to occur	Death

Adverse Event (Side Effect)	How Often This Happens in Children Treated with the Liposorber LA-15 System for Another Disease (High LDL- Cholesterol) Due to the System Itself	Harm to You
Cardiac (heart-related, including abnormal heart rhythm, slow heart rate, fast heart rate and heart attack)	Not reported to occur	Mild to serious
Thrombocytopenia (low count of platelets that help blood clot and prevent bleeding)	Not reported to occur	Mild to serious
Infection (local or widespread)	Occurred in 2 of 20 patients	Mild to serious
Hypersensitivity (allergic- type reaction to a part of the system)	Not reported to occur	Mild to serious
Nausea and vomiting (abdominal symptoms)	0.3-2.5% of treatments (1/333 to 1/40 treatments)	Mild
Low Vitamin E level (which can cause muscle weakness, nausea and vomiting)	Not reported to occur	Mild
Temporary decrease in blood protein level (including albumin which holds water in the blood vessels)	Not reported to occur	Mild to moderate
Hypotension (low blood	2.0-2.5% of treatments (1/50 to 1/40	Mild to
pressure)	treatments)	severe
Flushing/blotching of skin	Not reported to occur	Mild
Angina (chest pain)	0.2-0.3% of treatments (1/500 to 1/333 treatments)	Mild to moderate
Fainting/lightheadedness	Not reported to occur	Mild to moderate
Anemia (low blood count)	Not reported to occur	Mild to serious
Prolonged bleeding at intravenous or catheter site	Not reported to occur	Mild to moderate
Hemolysis (breaking up of red blood cells)	Not reported to occur	Mild to serious
System (machine or its parts) malfunction	Not reported to occur	Mild to serious

Adverse Event (Side	How Often This Happens in Children	Harm to You
Effect)	Treated with the Liposorber LA-15	
	System for Another Disease (High LDL-	
	Cholesterol) Due to the System Itself	
Vertigo (dizziness,	0-0.3% of treatments (none to $1/333$	Mild to
unsteadiness)	treatments)	moderate
Diaphoresis (excess	Not reported to occur	Mild
sweating)		
Urticaria	Not reported to occur	Mild
Shivering	0-0.3% of treatments (none to $1/333$	Mild
	treatments)	
Headache	0-0.5% of treatments (none to $1/200$	Mild
	treatments)	

This safety data clearly shows that rates of adverse events known to occur with the Liposorber LA-15 system were very low. This data provided reasonable assurance that the risk of device-related adverse events to children with FSGS would be acceptable.

VI. POSTMARKET DATA: ANNUAL DISTRIBUTION NUMBER

The Food and Drug Administration Safety and Innovation Act (FDASIA) amended section 520(m) of the Federal Food, Drug, and Cosmetic Act (FD&C) and allowed HDEs indicated for pediatric use to be sold for profit as long as the number of devices distributed in any calendar year does not exceed the annual distribution number (ADN). The ADN was defined to be the number of devices "reasonably needed to treat, diagnose, or cure a population of 4,000 individuals in the United States." FDA has interpreted that to imply that the calculation of the ADN should be 4,000 multiplied by the number of devices reasonably necessary to treat an individual. The approved ADN for the Liposorber® LA-15 System was 48,000 which takes into account that a single course of treatment requires 12 pairs of columns. Although the columns are sold as pairs, two a box, one box is considered a device and thus the ADN is calculated as 12 * 4,000 = 48,000. Table 2 shows the annual distribution number for 2014.

Section 613(b) of the FDASIA states that an HDE holder of a HUD for which an HDE was approved prior to the enactment of FDASIA on July 9, 2012 may submit an HDE supplement (21 CFR 814.108) requesting an exemption from the profit prohibition for a HUD. In September 4, 2012, the firm requested a determination that the Liposorber® LA-15 System met the conditions of either subclause (I) or (II) under section 520(m)(6)(A)(i) of the Federal Food, Drug, and Cosmetic Act (FD&C Act), as amended by the FDASIA, so that the device might be sold for profit. The HDE supplement request was approved by the FDA on October 10, 2013.

As stated in section 520(m)(8) of the Federal Food, Drug, and Cosmetic Act (FD&C Act), the agency's Pediatric Advisory Committee will annually review all HUDs intended for use in pediatric patients that are approved on or after September 27, 2007, to ensure that the HDE remains appropriate for the pediatric populations for which it is granted.

Calendar Year	Total Sales	Total Implants	Total Pediatric	Age Unknown					
(Jan - Dec)			Implants						
2014	12 Columns	Please see note 1.							
	12 Tubing Sets								
	12 Plasma								
	Separators								
	2 Machines								
1. Treatment	1. Treatments for FSGS patients have not started as of January 5, 2015.								

Table 2 Annual Distribution Numbers

VII. POSTMARKET DATA: POST-APPROVAL STUDY (PAS)

PAS Conditions of Approval:

The Liposorber HDE (H120005) was approved on October 10, 2013, with the following conditions of approval:

You have agreed to conduct a study as follows: The purpose of the study is to evaluate the long-term safety and probable benefit of the Liposorber LA-15 System for the treatment of pediatric patients who have FSGS with a GER 60 ml/min/ 1.73 m^2 accompanied by nephrotic syndrome in which standard treatment options are unsuccessful or not well tolerated or for the treatment of pediatric post renal transplant patients with nephrotic syndrome associated with primary ESOS. This will be a prospective, multicenter, single arm study with a total of 35 newly enrolled patients, treated at 3 to 10 clinical centers in the United States. The study participants will be followed for 24 months after the completion of the final apheresis procedure. The study visits will be as follows: Pre-procedural exams and laboratory tests, approximately 9 weeks of study apheresis procedures, and 1-, 3-, 6-, 12- and 24-month follow-up office visits. The primary objectives of this study are to confirm the safety and probable benefit of the Liposorber® LA-15 System in relieving nephrotic syndrome, defined as urine protein: creatinine ratio (Up/c) > 2.0 (gram protein per gram creatinine) with a first morning void urine sample, associated with refractory pediatric primary FSGS at 1 month after the final apheresis treatment. The primary probable benefit endpoint is the percent of patients who show complete or partial remission at 1 month after the final apheresis treatment. Complete remission is defined as Up/c < 0.2 (g/g) with a first morning void urine sample. Partial remission is defined as at least 50% reduction in Up/c compared to the value at screening or Up/c between 0.2 and 2.0 (g/g) with a first morning void urine sample. A sample size of 30 patients is required for this analysis. The Primary safety endpoint is the rate of device-related and procedure-related serious adverse events (SAEs) occurring during the treatment period and up to I -month followup visit. The rate of SAEs and corresponding 95% CI will be provided. The secondary objectives are to evaluate safety and probable benefit of the Liposorber®) LA-15 System in relieving nephrotic syndrome associated with refractory pediatric primary FSGS at 3 months, 6 months, 12 months, and 24 months after the final apheresis treatment. The secondary safety and probable benefit endpoints include: nephrotic condition (complete remission, partial remission, and nephrotic state) including the percentage of patients who obtain complete and partial remission at 3, 6, 12, and 24 months; incidence of adverse events encountered during the period in which apheresis treatments are given;

incidence of all adverse events and SAEs occurring within 3, 6, 12, and 24 months after the final apheresis treatment; and laboratory values, including eGFR at baseline, after the last treatment, and at 1, 3, 6, 12, and 24 months after the final apheresis treatment, including percent change from baseline and percentage of patients showing an increase or decrease in each value.

PAS Protocol (H120005/S001/A001):

At the time of device approval there was agreement on a PAS outline and the full protocol was developed and approved postmarket, on April 25, 2014.

- *Study Objective and Design*: This is a prospective, multicenter, single arm study with a total of 35 newly enrolled patients, treated at 3 to 10 clinical centers in the United States. The primary objectives of this study are to evaluate the safety and probable benefit of the Liposorber LA-15 System in relieving nephrotic syndrome associated with refractory pediatric primary FSGS at 1 month after the final apheresis treatment.
- *Study Hypothesis*: No formal hypothesis will be tested in this study. However, to evaluate the primary probable benefit objective, the percent of patients with complete or partial remission (based on a first morning urine specimen at 1 month after the final apheresis procedure) will be determined and the 95% confidence interval will be constructed.
- *Study Population*: Pediatric patients with nephrotic syndrome associated with primary focal segmental glomerulosclerosis, when the standard treatment options, including corticosteroid and/or calcineurin inhibitors treatments, have been unsuccessful or not well tolerated, and the patient has a GFR \geq 60 ml/min/1.73m2, or the patient is post renal transplantation.
- *Sample Size*: A total of 35 patients will be included. The primary probable benefit endpoint will be assessed using a 95% confidence interval. The assumption for sample size calculation was that 50% of patients would achieve a 50% reduction in urine protein at 1 month. Optimal conservative medical therapy would be expected to be approximately 10% based on the collected data in Glomerular Disease Collaborative Network (University of North Carolina, Chapel Hill, NC). The reported clinical results in pediatric steroid-resistant FSGS treated with the Liposorber® LA-15 System suggest the incidence of favorable cases is at least 25%, implying that the probable benefit of the system is superior to that of ordinary medical therapies. With a performance goal of 25%, an expected rate of 50% of patients, a one-sided exact binomial test, and a type I error rate of 0.025 (corresponding to a 95% one-sided confidence interval), 30 patients provides a power of 0.82.
- Study Endpoints:
 - The primary probable benefit endpoint is the percent of patients who show complete or partial remission at 1 month after the final apheresis treatment.

- The primary safety endpoint is the rate of device-related and procedure-related serious adverse events (SAEs) occurring during the period in which the apheresis procedures are administered and up to at the 1-month follow-up visit.
- Secondary endpoints are as follows:
 - Nephrotic condition (complete remission, partial remission, and nephrotic state) at 1, 3, 6, 12, and 24 months after the final apheresis treatment, including the percentage of patients who obtain complete or partial remission at 3, 6, 12, and 24 months
 - Incidence of adverse events encountered during the period in which apheresis treatments are given
 - Incidence of all AEs and SAEs occurring within 3, 6, 12, and 24 months after the final apheresis treatment
 - Laboratory values, including eGFR, at baseline, after the last treatment, and at 1, 3, 6, 12, and 24 months after the final apheresis treatment, including percent change from baseline and percentage of patients showing an increase or decrease in each value
- *Enrollment Plan and Follow-up Measures*: Preferred clinical sites will include physicians who have published in the field of treatment for pediatric FSGS. Since patients with FSGS are often referred to specialists at major medical centers, these larger centers are likely to be recruited due to referral patterns and physician specialists. Prior to enrollment in the study, the importance of keeping the study required scheduled visits will be stressed to both the patients and their guardians. If the patient or guardian feels that the required visits cannot reasonably be kept, the patient will not be enrolled in the study. In the event a patient does not arrive for treatment or scheduled follow-up, at least 3 attempts may be made to locate the patient and reschedule the visit.
- *Length of Follow-up*: Patients will be followed for 24 months after the final apheresis treatment.
- *Frequency of Follow-up Assessments*: Patients will undergo follow-up at 1, 3, 6, 12, and 24 months after the final apheresis treatment.
- *Statistical Plan*: Clinically-relevant baseline variables will be tabulated. Continuous variables will be reported as means and standard deviations unless otherwise noted. Categorical variables will be reported as percents. Covariate analysis may be performed to identify predictors of SAEs and/or remission. Covariate analysis will also be performed with transplant status (i.e., pre-transplant, post-transplant) as a variable to identify additional predictors of SAEs and/or remission. Survival analysis techniques such as Kaplan-Meier or Cox Proportional Hazards will be incorporated if censoring of

data occurs. Missing data may be addressed using multiple imputation and complete-case analysis.

PAS Study Status:

At the time of the most current interim report (H120005/R002), received at FDA on October 2, 2014, the study had not been initiated and no subjects had been enrolled. There were six potential study sites beginning preparation of IRB applications. The sponsor expected to enroll the first subject by the end of 2014. The next interim report is due on April 10, 2015. The study has been registered in the ClinicalTrials.gov database (Identifier# NCT02235857).

VIII. SYSTEMATIC LITERATURE REVIEW OF THE SAFETY OF THE LIPOSORBER LA-15 DEVICE FOR THE PEDIATRIC POPULATION

Purpose

In preparation for the FDA PAC 2015 spring meeting, a systematic literature review was conducted to address the following question: what adverse events are reported in the literature after treatment with the Liposorber LA-15 system, for any indication in the pediatric population (\leq 21 years old)?

Methods

On November 19, 2014, a search was conducted of the PubMed (Medline) and Embase databases using the following search strategies:

(Liposorber OR (LDL AND apheresis))

The search was limited to articles published between January 1, 1995 and October 31, 2014 (see Figure 3). The search returned 928 citations in PubMed, and 1,335 citations in Embase. After the exclusion of 772 duplicate records, there were a total of 1,491 results.

A first pass of the articles was conducted by reviewing titles and abstracts. The first pass resulted in 1,038 exclusions for the following reasons: non-clinical study such as editorial, animal study or bench study (n=420), no pediatric patients \leq 21 years of age (n=213), no use of the Liposorber LA-15 system (n=208), non-English (n=179), or conference abstract (n=18). After these exclusions, 453 articles remained.

A second pass consisting of full text review was then conducted. The second pass resulted in 438 exclusions for the following reasons: no use of the Liposorber LA-15 system (n=149), no pediatric patients \leq 21 years of age (n=110), conference abstract (n=62), non-systematic review (n=50), non-clinical study (n=45), not enough information in methods section (n=12), or did not report on the presence or absence of adverse events (n=10). After these exclusions, 15 articles remained for full data extraction and epidemiological review.

Results

Of the 15 articles included in the systematic review, 10 articles included pediatric patients only, and 5 articles included mixed populations of pediatric and adult patients. Results are presented first for the pediatric-only articles, followed by the results for the pediatric and adult subject articles.

Articles with Pediatric Patients Only

There were 10 articles with pediatric patients only, including five case reports/series (1-2 patients),³⁻⁷ two registry studies,^{2,8} two cohort studies,^{1,9} and one non randomized clinical trial¹⁰ (see Table 3). Sample sizes in these articles ranged from 1 to 29 patients, from 2 to 15 years of age.

Two case reports reported no complications.^{3,6} There were three serious adverse events reported in one registry study (with sample size of 1,191 treatments in nine patients); one patient became hypotensive and unresponsive during treatment, and two other patients developed bacteremia from central catheter insertion.² The other registry study (with sample size of 27 patients) reported three anaphylactic reactions probably due to bradykinin, which involved cutaneous flushing, nausea, headache, and blood pressure drop.⁸ Iron deficient (or "hypochromic") anemia was found by biochemical testing in five out of five patients in a small cohort study⁹ as well as patients in a registry² and case series;⁴ however, another larger study reported no incidences of anemia in 27 patients.⁸ Other non-serious adverse events included catheter infection, hypovolemia, shivering, vertigo, nausea, angina, abdominal cramps, urticarial, and vasovagal reaction. These adverse events (AEs) were all uncommon, occurring in 0-3% of treatments.^{1,2,7} Access/machine problems such as slow blood flow, needle infiltration or dislodgment, pain at the needle site, and technical difficulties were reported by multiple authors.^{1,2,5,7,8}

Articles with Pediatric and Adult Patients

There were five articles with a combined sample of both pediatric and adult patients, including two nonrandomized clinical trials (one study reported by two articles),^{11,12} two retrospective studies,^{13,14} and one cohort study¹⁵ (see Table 4). Sample sizes ranged from 16 to 120 patients, from 2 to 84 years of age.

Two of the articles reported data from the same clinical trial; these data are presented together in Table 4.^{11,12} Adverse event data were not stratified by age in any article reviewed, so the reported results in Table 4 represent combined pediatric and adult samples. Reported adverse events included hypotension, minor bleeding (treatable by compression or pressure bandage), serious hypotensive reactions (including flush, dyspnea, and/or bradycardia) in patients taking ACE inhibitors, lightheadedness, nausea/vomiting, and chest pain, which all occurred in less than 2% of treatments. One article reported "only one man who had recurrent reactions, which were mild and had no consequences" (p. 24); further detail about the reactions was not given.¹³ One cohort study reported a high incidence of fatigue (30/41 or 73.2% of treatments) and edema (39/46 or 84.8% of treatments); these events were not mentioned in any other article.¹⁵

Discussion

Fifteen articles were reviewed for safety data in the pediatric population. There was a large age range of patients treated, with two studies reporting patients as young as two years old.^{9,13} Most patients had a diagnosis of familial hypercholesterolemia (FH), although there were some with focal segmental glomerulosclerosis (FSGS) or nephrotic syndrome (NS) unrelated to FSGS. Across the 15 articles, there were three serious adverse events reported, including one event of hypotension and two events of bacteremia that developed from catheter insertion.² Other adverse events included minor hypotension, anemia, venous access problems, nausea/vomiting, dizziness/vertigo/lightheadedness, angina/chest pain, bleeding, fatigue, edema, abdominal

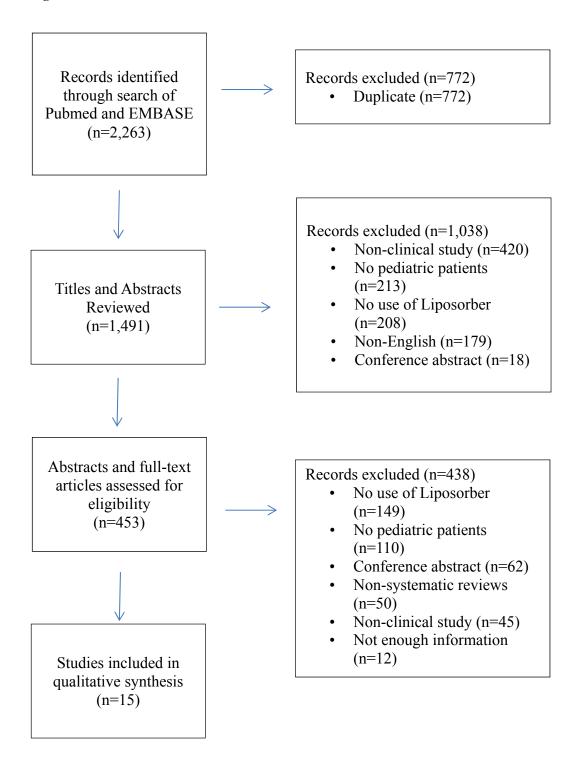
cramps, and urticaria. Rates of adverse events were low, generally less than 3%. There were three anaphylactic reactions reported,⁸ although it is unknown whether these patients may have been taking ACE inhibitors, which are a known contributor to anaphylactic reaction in LDL apheresis patients and contraindicated in the device labeling. Three articles mentioned the presence of anemia in their patients; a fourth found no evidence of anemia. Anemia does not represent a new concern, as the device labeling presently includes risk for anemia. All adverse events reported were anticipated based on previous knowledge. Technical problems such as patient compliance and venous access difficulties may also occur, due to patient age and size. This literature review has a number of limitations. First, all studies reviewed had small sample sizes. The small sample sizes reported were likely due to the rare nature of the diseases treated, especially FSGS. The largest study included 120 patients, and all other studies included 34 or fewer patients. Second, regarding study design, there were no large randomized clinical trials, which are considered the highest level of epidemiological evidence. There were two small to moderately sized clinical trials, but neither featured randomization nor a comparator group. The other 13 studies were observational in design, including five case reports/series with only 1-2 patients. Third, 5 of the 15 articles reported combined results for a mixed sample of pediatric and adult patients, so it is unclear whether the reported adverse events were experienced by pediatric patients. Studies were also heterogeneous with regard to patient characteristics such as diagnosis and length of LDL apheresis treatment (i.e., one time or ongoing). Finally, only 15 articles were eligible for inclusion in this literature review and assessment, despite a broad set of inclusion criteria.

It is also of note that only three studies were conducted in the United States,^{2,14} likely due to the fact that the Liposorber LA-15 system was not indicated for the pediatric population in the original device approval. All other studies were conducted in Europe or Japan. Four of the 15 articles included in this systematic literature review were written by the same group of authors at the University of Rome in Italy (Stefanutti, et al).^{1,4-6} In addition, two articles were written by another group of authors (Bambauer, et al) using data from one clinical trial;^{11,12} these data were presented together in Table 4. Because of these and other limitations previously noted, the generalizability of these data and conclusions to other populations such as pediatric patients in the U.S. is uncertain. However, the safety data available from these ten pediatric articles and five combined adult and pediatric articles suggests that most of the adverse events would be mild and anticipated.

Conclusions

Based on the search criteria used, the literature published since 1995 regarding pediatric use of the Liposorber LA-15 system is found to be limited at this time, with many studies being small and observational in nature. The most common adverse events in pediatric patients treated with the Liposorber LA-15 system were mild hypotension and venous access problems, which occurred in about 1-4% of treatments. Adverse events reported in adults were similar to those reported in pediatrics, including mild hypotension. The literature review raised no new safety concerns.

Figure 3 Article Retrieval and Selection



Source	Study Design	Age Dange ^a	Sample	Primary	Number of	Adverse Events (rate)
Down at al	Cohort	Range ^a 2-9	Size 5	Disease FH	Treatments 302	Iron deficiency enemie (5/5
Dann et al., 2013 ⁹ (Israel)	Conort	2-9	5	ГН	302	Iron deficiency anemia (5/5 patients, 100%)
Hattori et al.,	Nonrandomized	7-14	11	FSGS	Mean 11.5 ± 0.7	Catheter infection (1/11
$2003^{10}*$	clinical trial	/-14	11	1505	(SD) treatments	patients, 9%)
(Japan)	chinear that				per patient	partents, 970)
Hudgins et	Registry	3-15	29 total; 9	FH	1,191 (9 patients)	Serious AEs:
al., 2008 ² *	85		with AE		-,	1 patient became hypotensive
(U.S.)			data			and unresponsive; transferred
						to ER and discharged
						2 other patients were
						hospitalized for antibiotic
						therapy for bacteremia that
						developed from central
						catheters
						Other AEs:
						Mild hypotension $(29/1,191)$
						treatments, 2.4%) Nausea/vomiting (12/1,191,
						1.0%)
						Headache (6/1191, 0.5%)
						Abdominal pain (30/1,191,
						2.5%)
						Chest pain (2/1191, 0.2%)
						Access/machine problems
						(56/1,191, 4.7%)
						Iron deficiency anemia (rate
				77.77	-	NR)
Oto et al.,	Case report	8	1	FSGS	5	No complications
2009 ³ (Japan)						

Table 3 Articles with Pediatric Patients Only

Source	Study Design	Age Danga ^a	Sample	Primary	Number of	Adverse Events (rate)
Palcoux et al., 2008 ⁸ (France)	Registry	Range ^a 3-14	Size 27	Disease FH	Treatments NR	Anaphylactic reactions probably due to bradykinin (cutaneous flushing, nausea, headache and blood pressure drop); unknown whether on ACE inhibitors (3/27 patients, 11%) Hypovolemia (rate NR) ^b Vascular access insufficiency (rate NR) ^b
Stefanutti et al., 1995 ⁴ (Italy)	Case series	7-11	2	FH	81	Hypotension (rate NR) ^c Mild hypochromic anemia (1/2 patients, 50%)
Stefanutti et al., 1997 ⁵ (Italy)	Case report	4	1	FH	3	Mild hypotension (1/1 patient, 100%) Technical problems: acceptance of treatment and low blood flow in extracorporeal line (1/1 patient, 100%)
Stefanutti et al., 2001 ⁶ (Italy)	Case report	3	1	FH	9	No complications
Stefanutti et al., 2004 ¹ * (Italy)	Cohort	3-15	11	FH	1121	Mild hypotension (2.0%) Venous access problems (2.0%) Shivering (0.3%) Vertigo (0.3%) Nausea (0.3%) Angina (0.3%)
Zwiener et	Case series	7-10	2	FH	355	Occasional mild abdominal

Source	Study Design	Age	Sample	Primary	Number of	Adverse Events (rate)
		Range ^a	Size	Disease	Treatments	
al., 1995 ⁷						cramps (rate NR)
(U.S.)						Urticaria (3/355 treatments,
						0.8%)
						Vasovagal reaction
						(bradycardia, hypotension,
						and diaphoresis; 3/355, 0.8%)
						Venous access problems
						(6/355, 1.7%)

^aAge range at first treatment.

^bUnclear which patients received treatment with Liposorber or another device (Direct Adsorption of Lipoprotein, DALI).

^cOverall rate of hypotension was 2/103 treatments that include use of either Liposorber LA-15 or another device; Liposorber-specific rate was not reported.

*Article previously reviewed as part of premarket submission.

Abbreviations: AE=Adverse event; FH=Familial Hypercholesterolemia; FSGS=Focal Segmental Glomerulosclerosis; NS=Nephrotic Syndrome; NR=Not reported

Source	Study Design	Age Range (Mean) ^a	Total Sample Size	Pediatric Sample Size	Adult Sample Size	Primary Disease	Number of Treatments	Adverse Events (rate) ^b
Bambauer et al., 1997 ¹¹ Bambauer et al., 1999 ^{12c} (Germany, Scotland, and Luxembourg)	Nonrandomized Clinical Trial	10-77 (46)	120	NR	NR	FH	6,798	Hypotension in 44 patients (69/6798 treatments, 1%) Bleeding (11/6798, 0.2%) Serious reactions in 8 patients taking ACE inhibitors (10/6798, 0.2%) Other (71/6798, 1.0%)
Keller, 2009 ¹³ (Germany)	Retrospective	2-21 (NR)	16	15	1	FH	NR	Recurrent mild reaction in one man (symptoms NR; 1/16 patients)
Muso et al., 2014 ¹⁵ (Japan)	Cohort	18-84 (55)	44	NR	NR	NS	47	Fatigue (30/41 treatments, 73.2%) Edema (39/46 treatments, 84.8%)
Sachais et al., 2005 ¹⁴ (U.S.)	Retrospective	18-67 (50)	34	NR	NR	FH	NR	Lightheadedness (1.5%) Nausea/vomiting (1.2%) Hypotension (0.7%) Chest pain (0.6%) ^d

Table 4 Articles with Both Pediatric and Adult Patients

^aAge range and mean age at first treatment if reported. ^bUnknown whether AE occurred in pediatric or adult patients.

^cTwo articles reported on same dataset of patients (Bambauer 1997 and 1999). ^dAuthors note that these AEs were often associated with recent ACE inhibitor use, which is contraindicated in the device labeling. Abbreviations: AE=Adverse event; FH=Familial Hypercholesterolemia; FSGS=Focal Segmental Glomerulosclerosis; NS=Nephrotic Syndrome; NR=Not reported

IX. MEDICAL DEVICE REPORTS (MDRs)

Overview of Manufacturer and User Facility Device Experience Database (MAUDE)

Each year, the FDA receives several hundred thousand medical device reports (MDRs) of suspected device-associated deaths, serious injuries and malfunctions. The MAUDE database houses MDRs submitted to the FDA by mandatory reporters (manufacturers, importers and device user facilities) and voluntary reporters such as health care professionals, patients and consumers. The FDA uses MDRs to monitor device performance, detect potential device-related safety issues, and contribute to benefit-risk assessments of these products. MDR reports can be used effectively to:

- Establish a qualitative snapshot of adverse events for a specific device or device type
- Detect actual or potential device problems used in a "real world" setting/ environment, including:
 - rare, serious, or unexpected adverse events
 - adverse events that occur during long-term device use
 - adverse events associated with vulnerable populations
 - off-label use
 - use error

Although MDRs are a valuable source of information, this passive surveillance system has limitations, including the potential submission of incomplete, inaccurate, untimely, unverified, or biased data. In addition, the incidence or prevalence of an event cannot be determined from this reporting system alone due to potential under-reporting of events and lack of information about frequency of device use. Because of this, MDRs comprise only one of the FDA's several important postmarket surveillance data sources. Other limitations of MDRs include, but are not necessarily limited to:

- MDR data alone cannot be used to establish rates of events, evaluate a change in event rates over time, or compare event rates between devices. The number of reports cannot be interpreted or used in isolation to reach conclusions about the existence, severity, or frequency of problems associated with devices.
- Confirming whether a device actually caused a specific event can be difficult based solely on information provided in a given report. Establishing a cause-and-effect relationship is especially difficult if circumstances surrounding the event have not been verified or if the device in question has not been directly evaluated.
- MAUDE data is subjected to reporting bias, attributable to potential causes such as reporting practice, increased media attention, and/or other agency regulatory actions.

• MAUDE data does not represent all known safety information for a reported medical device and should be interpreted in the context of other available information when making device-related or treatment decisions.

MDRs Associated with the Liposorber® LA-15 System

The MAUDE (Manufacturer and User Facility Device Experience) database was searched utilizing the product codes MMY-Lipoprotein, Low Density, Removal, and PBN-Apheresis for Focal Glomerulosclerosis in Pediatric Patients, for MDRs received between April 21, 1995 to October 31, 2014. The MAUDE search resulted in 20 relevant MDRs, 18 reports submitted by the manufacturer, and 2 by a distributor, all under the MMY product code. There were no voluntary or user facility reports submitted over this period. Additionally, the manufacturer was contacted in December 2014 and confirmed the number of MDRs submitted to FDA.

Pediatric MDRs

There were no MDRs submitted under product code PBN, or the HDE indication for Apheresis for Focal Glomerulosclerosis in Pediatric Patients. There was a single pediatric MDR submitted under product code MMY, Lipoprotein, Low Density, Removal product code, in 2002 and involved an 11 year old male who received an over-infusion of heparin. The three MDRs of an indeterminate age (reported in 1998) did not contain enough information to determine under which indication the device was actually being used (i.e. Low Density Lipoprotein Removal, or Focal Glomerulosclerosis in Pediatric Patients).

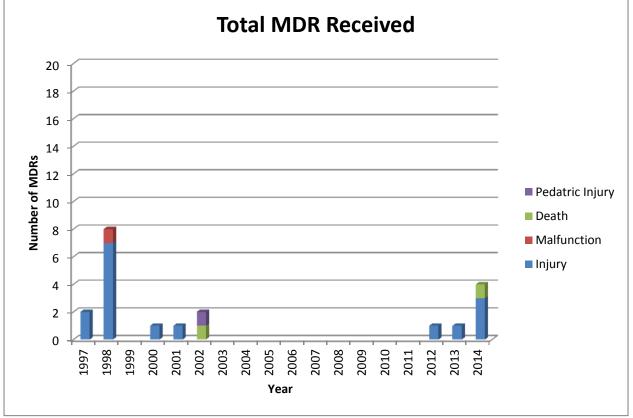
Since there were no MDRs submitted under the product code of interest, the analysis was completed including all reports related to the Liposorber LA-15 system for all uses.

Patient Event Type Information-All MDRs

The event types reported within the 20 MDRs included 2 deaths, 17 injuries, and one malfunction. One MDR was identified as a pediatric report, three reports did not report patient age (i.e. indeterminate age [blank field]), and the remaining 16 reports involved adult patients.

The 20 MDRs are depicted in Figure 4 by year received at the top of the next page.





The MDRs were submitted from the following countries:

- United States-2 reports
- Outside the United States -18 reports

Seventeen MDRs provided patient age with a range from 11 to 86 years old with a mean age of 64 years old. Twelve MDRs listed the patient as male; six listed the patient as female, and two reports listed gender as unknown or blank.

Patient Problem and Device Problem Information

Table 5 below shows the top Patient Problems and Device Problems reported in MDRs with the Liposorber device.

Patient Problem	Number of MDRs*	Device Problem	Number of MDRs*
Hypotension	8	Reaction	2
Shock	8	Disconnection	1
Anaphylactoid	4	Leak	1
Shock, Hypovolemic	3	Excess flow or over- infusion	1
Loss of Consciousness	3	Loose	1
Pain, Abdominal	2	Device operated differently than expected	1
Bradycardia	2		
Cardiac Arrest	2		
Cardiopulmonary Arrest	2		
Death	2		

*Please note that a single MDR may have multiple Patient Problems and/or Device Problems

Death Reports

Overall there were 2 identified MDRs with event type noted as death. There were no identified pediatric deaths. The causes of death included acute heart failure and hypotension which led to cardiopulmonary arrest. Individual review of each death report, including the event description and manufacturer narrative, found no clearly stated causality between the use of the device and the reported patient deaths. The reports stated that patient comorbidities were a possible cause of death, although use of the device could not be definitively eliminated as a contributory cause. The two reports are summarized as follows:

- A 76 year old male, died at the onset of the fourth treatment during the second term therapy with the system. The cause of the death was determined as "acute heart failure". The patient had several comorbidities, including, angina pectoris, hyperlipidemia, arteriosclerosis obliterans (ASO), diabetes, chronic renal failure, and Hepatitis C.
- A gastrointestinal bleed was observed on the day of treatment. The patient, an 86 year old male, had also recently received a Percutaneous Coronary Intervention and developed Disseminated Intravascular Coagulation Syndrome (DIC). The patient had noted difficult mandibular breathing, edema of the body, lower level of consciousness, and decreased blood pressure. The patient developed severe hypotension, loss of consciousness, and cardiopulmonary arrest approximately one hour into the treatment. Treatment immediately terminated, with cardiac compression performed, adrenalin given, but the

patient expired. The patient's comorbidities included cholesterol crystal embolization, ASO, and a gastrointestinal bleed.

Injury MDRs

The primary patient problems and adverse events reported were hypotension and shock. Six of the reports list the administration of an ace-inhibitor with device use. It's important to note that a warning is provided on the device labeling which states:

"Patients who have received an ACE (angiotensin converting enzyme) inhibitor within the last 24 hours should not be treated. Therefore, the physician must monitor the use of ACE inhibitor medication on an ongoing basis with each treatment. Patients receiving an ACE inhibitor may experience an anaphylactoid-like reaction, including hypotension associated with flushing, dyspnea, and bradycardia. Such reactions, if left untreated, may be life-threatening".

Therefore, it appears that at least some of the reported events involving shock, anaphylactoid-like reactions may be reflective of the failure to adhere to label warnings against the administration of an ACE inhibitor prior to or with the use of the Liposorber device. Reports which listed loss of consciousness also listed hypotension as a patient problem, as hypotension often was a factor which led to the loss of consciousness of the patient. The reports of cardiac arrest and cardiopulmonary arrest also reported hypertension and loss of consciousness. For further details and discussion of the injury reports, please refer to the MDR analysis document dated, January 9, 2015, provided together with this Summary document.

Malfunction Report

The single malfunction report submitted in 1998, involved a reported loosening of the clamp valve which resulted in incorrect plasma flow. No patient problem or impact was reported.

MDR Summary

There were 20 MDRs submitted for the Liposorber® LA-15 System between April 21, 1995 to October 31, 2014, with 14 of the 20 reports occurring between 1998 and 2002. One injury MDR was identified as a pediatric report, with three MDRs identified as indeterminate age. The remainder of the reports involved adult patient use. All of the reviewed MDRs were submitted under the original PMA indication for low density lipoprotein removal. No MDRs were reviewed under the HDE indication of apheresis for Focal Glomerulosclerosis in pediatric patients. The pediatric adverse event was related to an over infusion of heparin due to improper placement of the heparin syringe plunger into the Liposorber device. Information regarding patient outcome was not provided.

Patient issues primarily included hypotension, shock, anaphylactoid, and hypovolemic shock. Six of the adverse events may have been linked to the administration or possible administration of an ace-inhibitor medication prior to treatment with the device. A warning on the device labeling against the use of an ace-inhibitor within 24 hours of treatment with the Liposorber device is included in the Instructions for Use.

Overall, the patient problems experienced are known inherent risks for this device and do not represent any new or previously unknown concerns regarding patient safety.

X. SUMMARY

As of January 5, 2015, treatment for FSGS patients has not started. Our review of the published literature and received MDRs since the time of approval has not identified any new or unexpected risks for the pediatric population when compared to the premarket data. FDA concludes that the Liposorber LA-15 System for the indication of treatment in pediatric FSGS patients does not pose an unreasonable or increased risk of illness or injury, and that the probable benefit to health continues to outweigh the risk of injury or illness.

Therefore, FDA recommends continued surveillance and will report the following to the PAC in 2016:

- Annual distribution number
- PAS follow-up results
- Literature review
- MDR review

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