

Registries—A Dubious Panacea or the Best Thing Since Sliced Bread?

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# Why Should Device Manufacturers Bother with Registries?

- Because FDA requires it
- Because CMS requires it
- Because they are unique tools for data collection and communication of product safety, efficacy and customer satisfaction



### **PEMS**<sup>TM</sup>

- 60,000+ AAA/TAA case registry
- 4 years in use
- Password protected, HIPAA-compliant secure website
- Catalogues patient-specific and scan-specific data, including images, graphs, measurements and other treatment analysis tools
- First and only commercially available Internet-based surveillance database that catalogues SVS endorsed anatomical metrics for aortic aneurysms

Incorporates DAC transmission status page for confirmation or

cancellation by institution





#### What PEMS Does

- PEMS is designed and implemented for the benefit of clinicians tracking their patients
  - Longitudinal tracking of standardized radiological measurements
  - Longitudinal tracking of Clinical outcomes
  - Integrated with pre-op/post-op planning tool
  - Integrated with device sizing, fitting and ordering
  - Allows formation of data pools as specified by clinicians for academic study
  - Offers world's largest standardized radiological database
- PEMS is used by hundreds of institutions, thousands of people, many thousands of times a month—it works!



#### What PEMS doesn't do

- Regularly provide data to FDA, CMS or product manufacturers
- Provide data to SVS or other clinical organizations
- Why not?
  - Who owns the data
  - What can it be used for
  - What can't it be used for
- Why create the infrastructure for new registries when the existing data is under utilized?



#### **Points of View**

- Clinical Dr. Deaton, Vascular Groups, SVS
- Regulatory FDA, CMS
- Device Manufacturers



## POV: Clinicians Registries Should Provide

- Data collection for long-term analysis of device safety and function
- Access to data for publication
- Follow the "natural progression" of a disease
- A resource to help establish clinical best practices
- Easy and quick data entry



## POV: FDA and CMS Registries Should Provide

- Regulators solicit data from manufacturers
- Regulators want dependable data—Part 11 compliant
- Internal validation via Imaging
- Controls—e.g. open AAA repair



#### POV: FDA and CMS

- Practical Sample Sizes—universal participation is unnecessary
- Timeliness is essential—ascertain and fix problems as they happen



## Why is This Hard?

- 3 customer groups with divergent requirements
- Manufacturer-specific IFU's
- Manufacturer-specific markers for device failure
- Loads of radiology data to be analyzed
- Surgeon or nurse coordinator time to fill in forms



### Practical Registry Requirements

- Image based for validation
  - Image transfer & processing is essential
  - Clinician use is driven by ubiquitous imaging
- Standardization
  - Metrics
  - Clinical outcomes
- Customization
  - Requirements of individual manufacturers
- Timing
  - Registry must highlight real-time problems
- Security
  - Doctors, Manufacturers, Patients must all have confidence in the system.
- Financial Viability
  - Needs to be self-sufficient
- Utility
  - Day-to-day use validates the information gathered



### **Outstanding Questions**

- "Each endovascular graft design has a unique risk/benefit profile. For endovascular grafts, the particular issues depend on device design." [Dorothy Abel, FDA]
- For an individual patient with AAA disease, which is the optimal targeted device based on their morphology and measured outcomes?



## POV: Device Companies Registries Should Provide

- The company paying for the data should own its use and be assured that their data is private and separate from others.
- Data collected must be tailored to the individual product, but also meet regulatory requirements.



### **POV: Device Companies**

- Include Marketing, Sales and Clinical data.
- Be flexible to address changes in product, market, clinical or regulatory.
- Payment for data should produce data for every dollar spent—variable cost based.





Data. Knowledge. Results.