

dexcom

Health Outcomes in Device Studies

Comments for May 21, 2024 MEDCAC Meeting

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Disclosures

- I am an employee and shareholder of Dexcom, Inc

Trial Duration

Trial duration of 12 weeks is sufficient

- The DCCT conclusively demonstrated improvements in A1C resulted in reduced rates of microvascular complications in people with type 1 diabetes¹
- UKPDS conclusively demonstrated improvements in A1C resulted in reduced rates of microvascular complications in people with type 2 diabetes²
- EDIC³ & UKPDS Follow-up⁴ demonstrated reduced risk of cardiovascular disease in people with type 1 & type 2 diabetes in intensively treated groups
- A1C is an appropriate surrogate marker for complications and can be assessed after 12 weeks
- Requiring trials longer than 12 weeks:
 - Increases participant burden and risk of increased drop out
 - Delays length of time for therapies to reach patients and would be prohibitively expensive
- **We recommend a minimum trial duration of 12 weeks**



1. DCCT/EDIC Research Group. NEJM. 2000 Feb 10;342(6):381-9. 2. UKPDS Group. The Lancet. 1998 Sep 12;352(9131):837-53. 3. DCCT/EDIC Study Research Group. Diabetes Care. 2016 May 1;39(5):686-93. 4. Holman RR et al. NEJM. 2008 Oct 9;359(15):1577-89.

A1c

0.3% difference is clinically meaningful

- Magnitude of A1c improvement is correlated with baseline A1c levels¹
 - Lower baseline levels typically result in lower magnitude of improvements
- A1c change of 0.3% is clinically meaningful and has been associated with reduced risk of retinopathy²
- Guidance from both the FDA^{3,4} and the European Medicines Agency (EMA)⁵ use the 0.3% threshold when evaluating drugs to improve glycemic control
- **We recommend establishing a minimum clinically important difference for A1C of 0.3%**

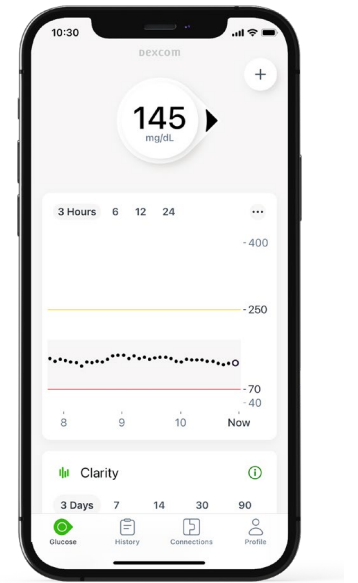


1. Billings LK et al. Diabetes Technol Ther. 2018 Aug 1;20(8):561-5. 2. Lind M et al. Diabetologia. 2010 Jun;53:1093-8. 3. https://downloads.regulations.gov/FDA-2008-D-0118-0003/attachment_1.pdf. 4. <https://www.fda.gov/media/168475/download> 5. https://www.ema.europa.eu/en/documents/scientific-guideline/guideline-clinical-investigation-medicinal-products-treatment-or-prevention-diabetes-mellitus-revision-1_en.pdf.

Time in Range (TIR)

5% difference in TIR is clinically meaningful

- CGM use allows for measurement of TIR, which has significant advantages over A1c¹
- TIR derived from 7-point fingerstick testing in DCCT was strongly associated with the risk of microvascular complications²
- A 10% increase in TIR correlates with a 0.6-0.8% reduction in A1C^{3,4}
- A 5% increase in TIR correlated with a significant reduction in risk of retinopathy⁵
- A 2019 international consensus statement on TIR concluded that “incremental successes (e.g., 5% increase in TIR) are, in fact, clinically significant”⁶
- A 2023 international consensus statement concluded that, “A difference of $\geq 5\%$ (absolute percentage points) in time in range is considered clinically meaningful for an individual participant in a clinical study and 3% is considered clinically meaningful for a treatment group difference in mean time in range”⁷
- **We recommend establishing a minimum clinically important difference for TIR no higher than 5%**



1. Beck RW et al. Diabetes Care. 2017 Aug 1;40(8):994-9. 2. Beck RW et al. J Diabetes Sci Technol. 2019 Jul;13(4):614-26. 3. Vigersky RA et al. Diabetes Technol & Ther. 2019 Feb 1;21(2):81-5. 4. Beck RW et al. J Diabetes Sci Technol. 2019 Jul;13(4):614-26. 5. Shah VN et al. Diabetes Technology & Therapeutics. 2024 Feb 13. 6. Battelino T et al. Diabetes Care August 2019; 42(8):1593–1603. 7. Battelino T et al. The Lancet Diabetes & Endocrinology. 2023 Jan 1;11(1):42-57.