ABBOTT LABORATORIES

Corporate Regulatory and Quality Science 2822 '03 JUN -5 A6:58

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Dockets Management Branch (HFA –305)
Food and Drug Administration
5630 Fishers Lane - Room 1061
Rockville, MD 20852

RE: Statistical Guidance on Reporting Results From Studies Evaluating Diagnostic Tests *[Docket 03D-0044]*

Dear Sir or Madam:

Abbott Laboratories submits the following comments regarding FDA draft guidance document "Statistical Guidance on Reporting Results From Studies Evaluating Diagnostic Tests," published in the Federal Register on March 12, 2003 at 68 FR 11871.

This is a clear, well-written document. The step-by-step examples are particularly useful. Further, we believe the document will be helpful in providing a uniform approach to the evaluation of performance characteristics of qualitative tests with one of two possible outcomes.

We encourage FDA to establish and maintain an open dialogue with industry on this topic. As noted in the guidance document, CDRH is available to discuss with industry possible study designs and statistical analyses prior to data collection. We also recommend CDRH work with industry to review data presentations that are inconsistent with this guidance document and collaborate to identify alternative data presentations. Such work could be accomplished through individual manufacturer meetings, as well as through more general discussions at industry meetings.

Additionally, as stated in the guidance document, one of its purposes is to "identify common inappropriate practices." Because diagnostics currently on the market may contain data presentations that are not considered appropriate for more recently cleared/approved diagnostics it is important for the laboratory community to understand FDA's current thinking on this topic.

Education of the laboratory community is necessary to promote understanding and acceptance of the data presentations discussed in the guidance document. It is especially important for laboratories to understand that a recently cleared or approved

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diagnostic with a data presentation reporting a measure of agreement is not inferior to a previously cleared or approved diagnostic reporting estimates of sensitivity or specificity to an imperfect standard.

Educational efforts by FDA in this area will be extremely valuable. We recommend FDA engage in such education through a variety of channels, such as posting a discussion of FDA's current thinking on the Laboratory Information section of its OIVD web site located at http://www.fda.gov/cdrh/oivd/laboratory.html. Additionally, FDA could work with Laboratory Professional Associations to explain the statistical approaches contained within the guidance document. Such efforts would help facilitate acceptance by the laboratory community, and proactively address potential misunderstandings.

Additionally, Abbott provides the following specific comments regarding items discussed within the Appendix of the draft guidance document.

1. Section "Calculating an Estimate of Agreement" – Please clarify if the reference to Cohen's kappa is the same Kappa Statistic method described in *Fundamentals of Biostatistics* by Bernard Rosner and *Statistical Methods for Rates and Proportions* by Joseph L. Fleiss. The inclusion of additional references regarding Cohen's kappa would be useful.
2. Table 5B - The second sentence should read "Disease prevalence is ~~four times greater than~~ one-fourth of that in Table 5A."
3. Table 8 – To aid the reader include the following information as part of the footnote "All specimen results incorrectly assumed to be correct (i.e., 40+ should be 39+ and 1-, and 171- should be 165- and 6+, respectively)."

Thank you for the opportunity to provide these comments. Should you have any questions, please contact me at (847) 937-8197 or by facsimile at (847) 938-3106.

Sincerely,

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