

# Diversity in Pediatric Type 2 Diabetes (T2D) Trials

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# Disclosure

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*The contents of this presentation represent the views of the speaker and do not necessarily reflect FDA policy*

I have no financial conflicts of interest to report

# Overview

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- Introduction to Youth-onset Type 2 diabetes (T2D)
- FDA's approach to encouraging representative studies through regulations impacting pediatric trials (PREA/BPCA) and new guidance related to diversity action plans
- Highlight unique challenges in conducting clinical trials in youth-onset T2D
- Assessment of representativeness for a sample of pediatric T2D clinical trials
- Lessons Learned & Future Directions

# Youth-onset Type 2 Diabetes (T2D)

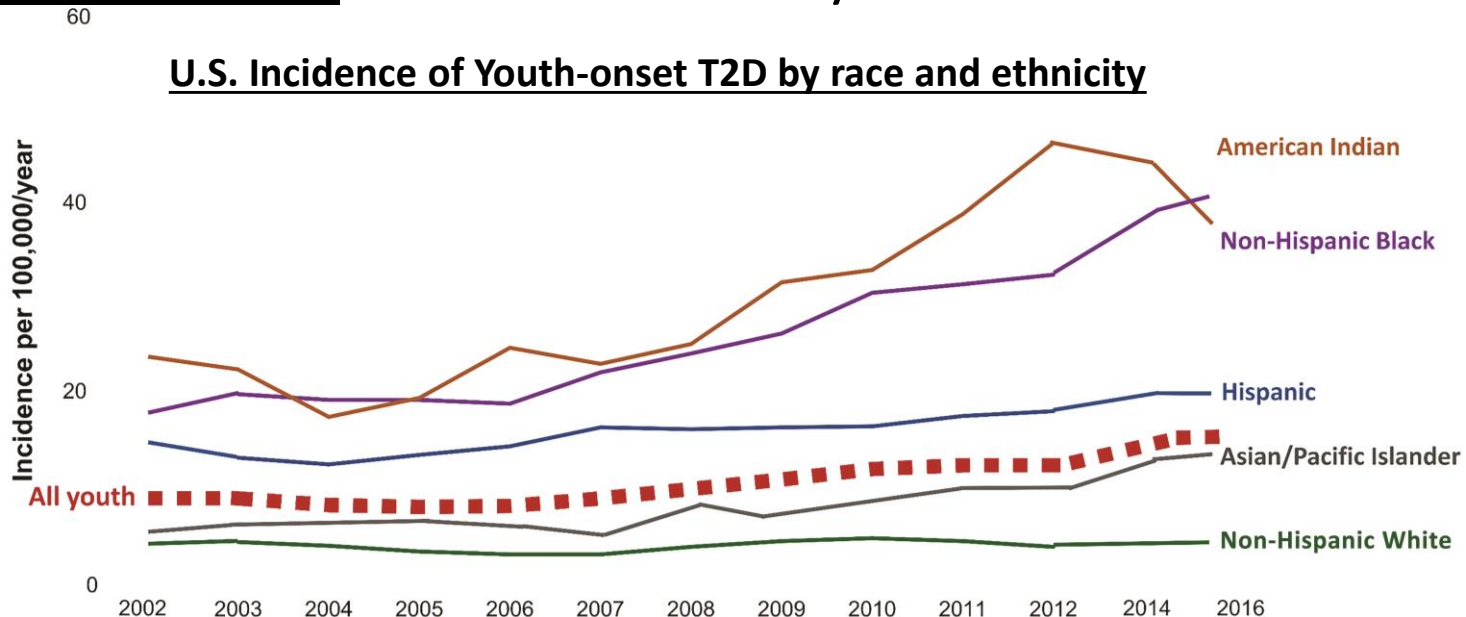
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- Type 2 diabetes (T2D) in youth is a serious disease
  - Complications of diabetes develop rapidly in children, with a high risk of debilitating complications by young adulthood
  - Mortality in children with T2D is ~2-3x higher than the general population
- Diabetes is common (1:10 in U.S., 90-95% T2D)
- However, **Youth-onset T2D** is relatively rare
  - **Prevalence:** 1 in 1,500 U.S. youth <20y  
Of ~43 mill U.S. youth (10-19y) in the US, ~**28,800** have T2D\*
  - **Incidence:** Each year, ~5,300 youth <20y are diagnosed with T2D  
In contrast, >3x as many youth are diagnosed with type 1 diabetes  
([SEARCH 2017-2018 Wagenknecht LE et al. Lancet Diabetes Endocrinol. 2023](#))
  - Impacts **female** > male youth ([Perng W et al Diabetes Care. 2023](#))

\* Based on data obtained from U.S. census bureau (2023)  
& pediatric T2D prevalence from SEARCH 2017-2018

# Burden of youth-onset T2D

- While youth-onset T2D is still relatively rare, there is a rising number of diagnoses in children every year
  - Yearly diagnoses almost doubled from 2002 → 2018
- In the US, racial and ethnic minority populations carry the largest burden of this increase in youth-onset T2D



# Representation in pediatric trials

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- Evaluating the safety and effectiveness of medical care and treatments for a representative and diverse population is critical to advancing health equity
- For pediatric T2D, there is a disproportionate impact on youth of ethnic/racial minorities:
  - higher rate of new diagnoses
  - differences in both health outcomes and differences in risk factors for health outcomes observed by race and ethnicity  
(Bacha F, Cheng P, et al *Diabetes Care*. 2021)
- Representation in youth-onset T2D trials is important in ensuring that positive health outcomes from treatments being investigated apply to all patients

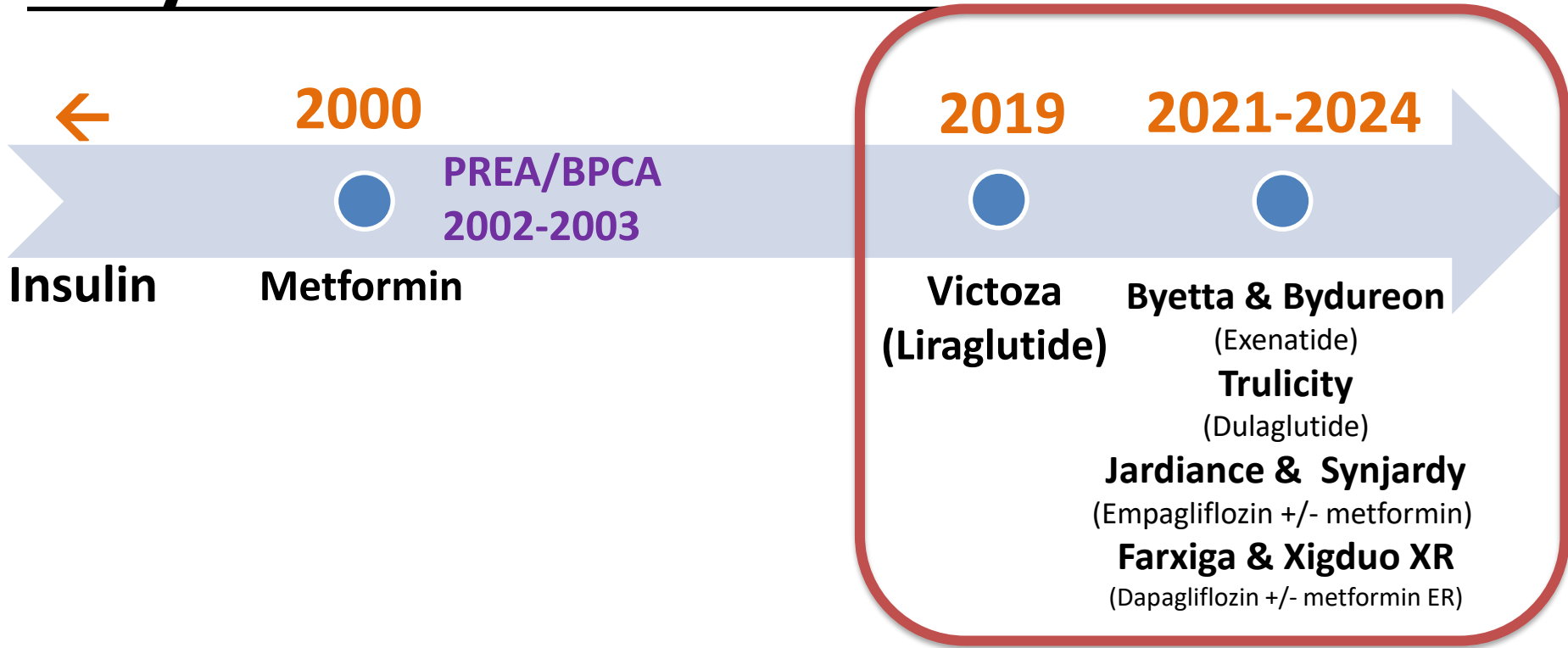
# FDA Regulations: Pediatric Trials

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- **Pediatric Research and Equity Act (PREA) 2003**
  - A **requirement** to submit a pediatric study plan at the time of the completion of Phase 2 Trials in adults
- **Best Pharmaceuticals for Children Act (BPCA) 2002**
  - A **request** to conduct pediatric clinical studies by issuing a Written Request
  - If terms of Written Request fulfilled, may add 6 months of market exclusivity
  - section 505A(d)(1)(A) of the Federal Food, Drug and Cosmetic Act states that in issuing a Written Request, the FDA shall ***“take into account adequate representation of children of ethnic and racial minorities”***

**June 2024:** *Draft guidance for industry, Diversity Plans to Improve Enrollment of Participants from Underrepresented Racial and Ethnic Populations in Clinical Trials*

# FDA-Approved Treatments for youth-onset T2D



an average of 8.6 years  
between adult approval  
and pediatric approval  
(range 7-10 years)



# Challenges: youth-onset T2D trials

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- Longer time required to complete trials in pediatric T2D due to slow enrollment
  - From an analysis of U.S. Phase 3/4 pediatric T2D trials (2000-2020): 5/17 (30%) met enrollment targets in < 4 years

Currie BM, Howell TA, et al. *Diabetes Ther.* 2021

Longer enrollment times contribute to longer timelines to approval of drugs in pediatric T2D

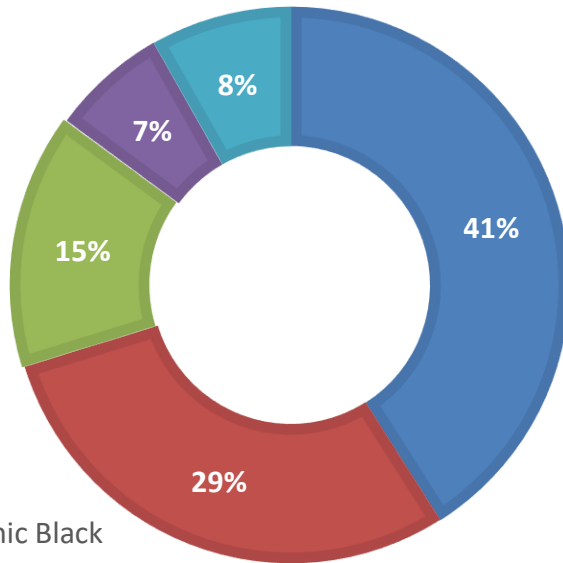
# Pediatric T2D Assessment

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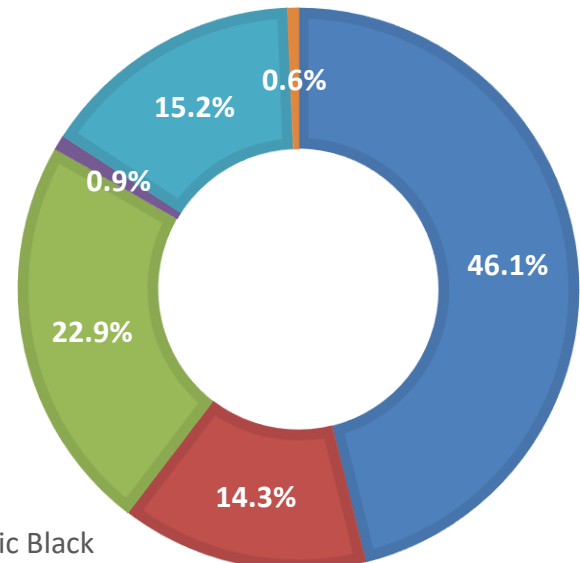
- **Goal:** compare the race and ethnicity breakdown of pediatric T2D trials submitted to the diabetes division versus the known race and ethnicity breakdown of youth with T2D in the US
  - 5 clinical trials identified (limited to FDA approvals)
- **Source of Representativeness Benchmark:**
  - **SEARCH For Diabetes in Youth study**
    - CDC-funded, NIH-supported study that surveilled physician-diagnosed diabetes in 5 U.S. states plus select American Indian reservations, from 2000 to 2020
    - population selected to represent, or overrepresent youth thought to be at greatest risk for youth-onset T2D
    - CDC’s prevalence & incidence estimates for youth onset T2D come from the SEARCH study ([CDC.gov, National Diabetes Statistics Report](https://www.cdc.gov/diabetes/data-reports/national-diabetes-statistics-report/))

# 2017 SEARCH N=1,230

# 5-study Analysis N=811 (Global)



- Hispanic
  - Non-hispanic Black
  - Non-hispanic White
  - Non-hispanic American Indian or Alaska Native
  - Non-hispanic Asian\*
- \* includes Native Hawaiian or Other Pacific Islander

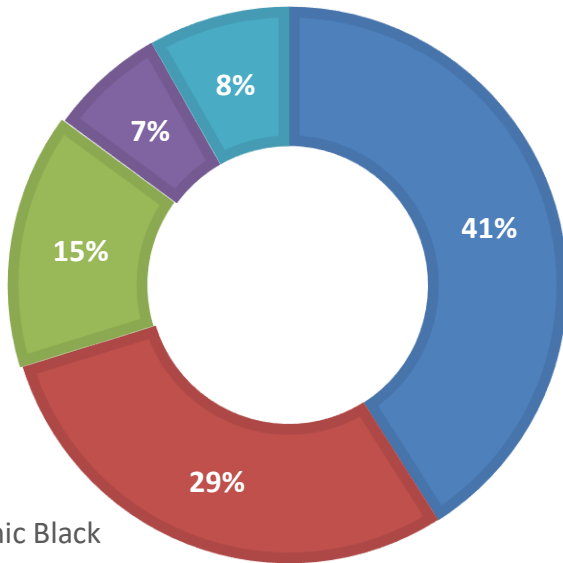


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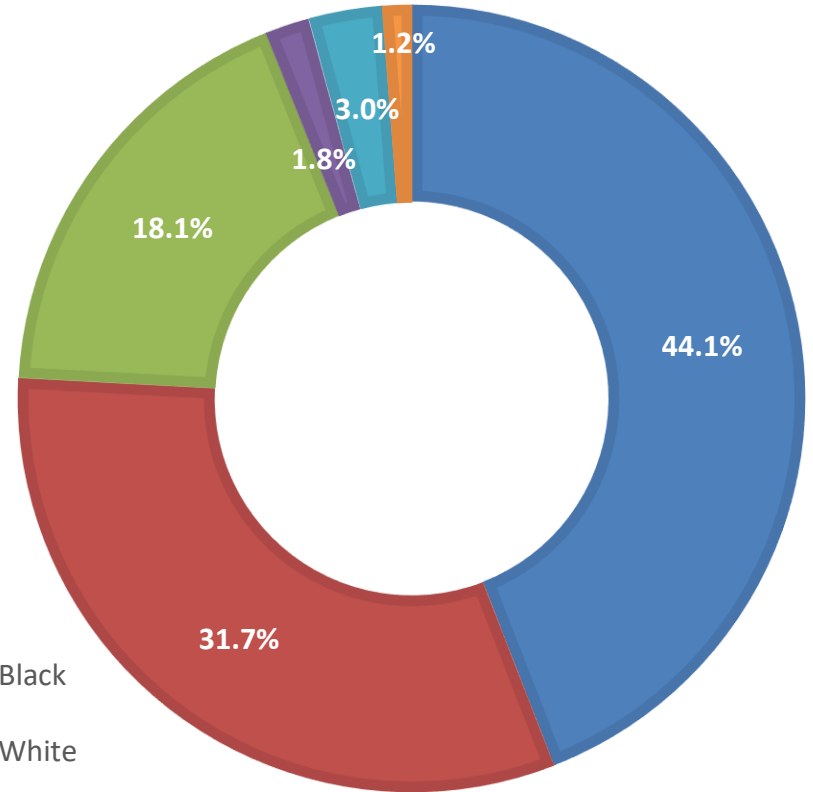
**Note:** Global trials included 42% US vs. 58% Non-US subjects (US subjects made up 15-68% of the study populations)

# 2017 SEARCH N=1,230

# 5-study Analysis N=339 (US)



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Lawrence JM, Divers J, et al; JAMA 2021

# Conclusion

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This assessment identified several gaps in the representativeness of pediatric T2D trials submitted to DDLO, but also was generally encouraging

- American Indian and Alaska Native, Asian and Native Hawaiian or other Pacific Islander patients with youth-onset T2D from the US are underrepresented based on this analysis

## **Lessons Learned:**

- This analysis strategy could be applied to other pediatric clinical trial programs to evaluate relative representativeness in order to establish gaps and ensure better representation in clinical trials going forward

# Next Steps

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- Additional opportunities moving forward to address barriers in representativeness as well as overcome other challenges in conducting efficient youth-onset T2D trials
  - Increase public and stakeholder engagement: Pediatric T2D Workshop (Spring 2025)
  - Integrate diversity action plans in pediatric trial conduct (draft 2024 guidance)
  - Further collaboration with ORISE fellow in Indigenous Knowledge Fellowship program to investigate pediatric T2D trial representativeness with a focus on American Indian and Alaska Native populations

# Thank You!

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# References

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