

Efficacy of inControl Advice: A Decision Support System (DSS) for Diabetes

A Randomized Clinical Trial to Assess the Efficacy of CGM+DSS versus CGM to Improve Glucose Control in Subjects with T1DM on MDI Therapy

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TABLE OF ACRONYMS

Acronym	Abbreviation For
ADA	American Diabetes Association
AP	Artificial Pancreas
ATTD	Advanced Technologies & Treatments for Diabetes
AUC	Area Under the Curve
BG	Blood Glucose
BRM	Basal Rate Modulator
BT	Bluetooth
CRF	Case Report Form
CGM	Continuous Glucose Monitoring
CI	Confidence Interval
CLC	Closed-Loop Control
CSII	Continuous Subcutaneous Insulin Infusion
CTR	Control-to-Range
DSS	Decision Support System
DiAs	Diabetes Assistant
DKA	Diabetic Ketoacidosis
DSMB	Data and Safety Monitoring Board
EC	European Commission
FDA	Food and Drug Administration
GCP	Good Clinical Practice
HAS	Hyperglycemia Avoidance Survey
HbA1c	Hemoglobin A1c
HCT	Helmsley Charitable Trust
HFS-II	Hypoglycemia Fear Survey
HMS	Hyperglycemia Mitigation System
ID	Identification
IDE	Investigational Device Exemption
IOB	Insulin-on-Board
IQR	Interquartile Range
JDRF	Juvenile Diabetes Research Foundation
MDI	Multiple Daily Injections
NFC	Near Field Communication
NIH	National Institutes of Health
OS	Operating System
POC	Point-of-Care
QA	Quality Assurance
QC	Quality Control
RCT	Randomized Controlled/Clinical Trial
RMB	Risk-Based Monitoring

Acronym	Abbreviation For
SADE	Serious Adverse Device Event
SAE	Serious Adverse Event
SAP	Sensor-Augmented Pump
SD	Standard Deviation
SFPQ	Six Factor Personality Questionnaire
SH	Severe Hypoglycemia
SI	Insulin Sensitivity
SII	Subcutaneous Insulin Injection
SMBG	Self-Monitoring of Blood Glucose
SSL	Secure Sockets Layer
SSM	Safety Supervision Module
T1DM	Type 1 Diabetes Mellitus
T2DM	Type 2 Diabetes Mellitus
UADE	Unanticipated Adverse Device Effect
UI	User Interface
UVA	University of Virginia

123

124 **1 INTRODUCTION**

125 **1.1 Background**

126 Behavioral Challenges to the Control of Type 1 Diabetes Mellitus (T1DM): Regular meals, exercise, and even a strict daily regimen are interrupted by generally random behavioral events (e.g. insulin overdose, missed food, or excessive exercise [1,2]). A formal description of the process of self-treatment behavior in T1DM and its potential to generate network challenges is critical for the engineering of any system relying on interaction with human behavior. We have created the Stochastic Model of Self-Regulation Behavior which gives a probabilistic interpretation of the pattern: internal condition → perception/awareness → appraisal → self-regulation decision [2,3] and approximates behavioral self-regulation of T1DM with a stochastic process quantifying the probability for extreme events, such as severe hypoglycemia or major hyperglycemia. The parameters of this process are specific to each individual. We have shown that such an approach was particularly useful for understanding the causes of severe hypoglycemia [1,4]; the approach was employed by well-established behavioral interventions, such as BGAT (Blood Glucose Awareness Training) [5,6].

139 **1.2 Preliminary Studies**

140 **The Effects of Automated Decision Support:** We have also shown that automated behavioral feedback delivered in the field by a portable device can optimize glycemic control by simultaneously reducing HbA1c and occurrence of severe hypoglycemia [7]. This study tested the effect of an automated

141 system providing real-time HbA1c estimates of, 142 glucose variability, and 143 risk for hypoglycemia 144 (Figure 1). For one year, 145 120 adults with type 1 146 diabetes, 69/51 147 female/male, age = 39.1 148 (± 14.3) years, duration of 149 diabetes 20.3 (± 12.9) 150 years, HbA1c=8.0 (± 1.5) 151 %, performed self- 152 monitoring of blood 153 glucose (SMBG) and 154 received feedback at three 155 increasingly complex 156 levels, each continuing for 157 3 months: Level 1 - 158 routine SMBG; Level 2 - 159 adding estimated HbA1c, 160 hypoglycemia risk, and 161 glucose variability; Level 162 3 - adding estimates of symptoms potentially related to hypoglycemia.

163 The subjects were randomized to feedback sequences of either Levels 1-2-3 or Levels 2-3-1. HbA1c, 164 symptomatic hypoglycemia, and blood glucose awareness, were evaluated at baseline and at the end of 165 each level.

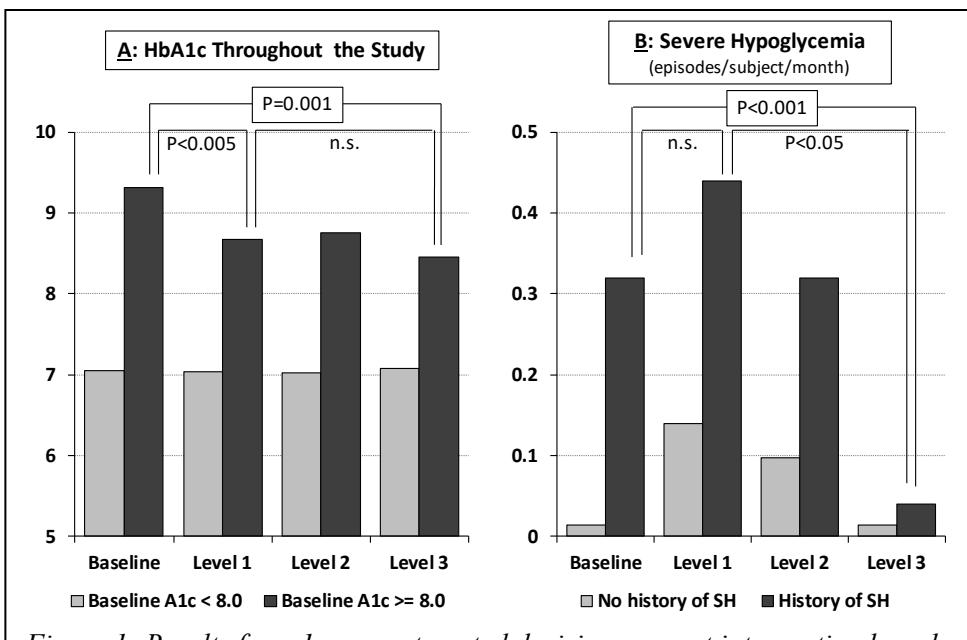


Figure 1: Results from 1-year automated decision-support intervention based on SMBG data, with 3 levels of feedback to the patient: Level 1 – SMBG only; Level 2 – aggregate glycemic characteristics based on SMBG; Level 3 – adding perceived symptom ratings [7]

170 For all subjects, this decision-support intervention reduced HbA1c from 8.0 to 7.6 from baseline to the
171 end of study, $p=0.001$. This effect was confined to subjects with baseline HbA1c above 8.0 (from 9.3
172 to 8.5, $p<0.001$). Incidence of symptomatic moderate/severe hypoglycemia was reduced from 5.72 to
173 3.74 episodes/person per month ($p=0.019$), more prominently for subjects with history of severe
174 hypoglycemia (from 7.20 to 4.00 episodes, $p=0.008$) and for those who were hypoglycemia unaware
175 (from 6.44 to 3.71 episodes, $p=0.045$). The subjects' ratings of the feedback were positive, with up to
176 89% approval of the provided features. We have therefore concluded that feedback of SMBG data and
177 summary SMBG-based measures resulted in improvement in average glycemic control and reduction
178 in moderate/severe hypoglycemia. As summarized in Figure 1, these effects were most prominent in
179 subjects who were at highest risk at the baseline [7]:

180 The system used in this study was an early prototype of the Decision Support System proposed here; it
181 included advisory modules assessing the risk for hypoglycemia, HbA1c, and BG variability, all
182 estimated from self-monitoring data (see [7]-online appendix).

183 Closed-Loop Control (CLC): In the past 5 years, our CLC (artificial pancreas, AP) studies have
184 progressed from short-term 2-day trials in controlled outpatient environment to 6-month free-living
185 studies. These studies used the first portable AP platform – the Diabetes Assistant (DiAs) introduced
186 by our UVA group in 2011. DiAs was built using an Android smart phone as a computational hub and
187 included AP user interface (UI) designed for the patient [8-12] and a Cloud-based remote monitoring
188 and automated alert system [11]. The defining characteristic of DiAs is its ability to switch smoothly
189 between different modes of operation, depending on patient preference and signal availability [8,12].

190 To date, 475 patients with T1DM have tested DiAs for over 230,000 hours of outpatient use. These
191 studies were conducted at several centers in the U.S. and overseas. We can therefore affirm that
192 reliable technology has been developed and sufficient data have been accumulated to warrant the
193 transition of this system to user modes that go beyond closed-loop control - most importantly for this
194 project - *Decision Support for diabetes using closed-loop control technology*.

195 In addition to a stable, well tested platform, the AP project developed key technologies that are at the
196 core of the proposed DSS, namely: (i) the state estimation and modelling powering the treatment
197 adaptation and insulin sensitivity tracking, and (ii) glycemic forecast modules that now enable the
198 exercise adviser system, the nighttime adviser system, and the hypoglycemia prediction system.

199 inControl Advice, inControl-AP, Cloud Database, Notifications/Alerts, and Remote Monitoring:

200 Our DiAs platform [8-12] has now matured into a third-generation system developed by TypeZero
201 Technologies, Inc. (under license from UVA) - the inControl product family (Figure 2), which includes
202 both local (e.g. insulin dosing advice or closed-loop control) and global (e.g. parameter management,
203 notifications, alerts, remote monitoring) functions. The inControl local applications are implemented
204 on a standard Android smartphone and uses Bluetooth (BT) to communicate with a CGM and Near
205 Field Communication (NFC) to communicate with insulin pens. Currently, inControl runs on a
206 modified release of the Android operating system (OS). Modifications of the OS include the removal
207 of unnecessary applications and functions, and fixes to the BT stack to permit communication with
208 peripheral medical devices. The local inControl module is an Android application with a JS/CSS UI.
209

•

210 inControl-AP: When running closed-loop control, inControl-AP communicates with an insulin pump
211 and modulates insulin delivery automatically to keep blood glucose in a target range. inControl-AP
212 operates on a 5-minute cycle based on the highest frequency of input data. There are three insulin
213 dosing modes (stopped, pump and closed loop) and three operating modes (normal, sleep and

214 exercise). The combination of insulin dosing mode and operating mode determines what actions
215 inControl-AP will perform and what options are presented to the user.

216 inControl-Cloud is an external server system that communicates with the Network Service within
217 inControl-AP over a secure SSL to:

218 • Allow the patient to log in with their inControl-Cloud ID;
219 • Deliver user biometric data (height, weight, date of birth etc.) and therapy profile information
220 (basal rate, carbohydrate to insulin ratio, correction factor).

221 inControl Advice: In this protocol, we now intend to use inControl-Advice, which is designed to
222 provide advice to users, instead of directly controlling the insulin delivery system. inControl Advice
223 shares many of the features of inControl-AP described above, but does not implement automated
224 insulin delivery and receives data from an insulin pen. Instead of automated 5-min adjustments to the
225 insulin delivery, the system provides a series of real-time alerts and on-demand advice, for both dosing
226 of insulin and ingestion of carbohydrates, based on data collected from T1DM patients (i.e.
227 carbohydrate consumption, insulin injected, CGM) and inControl Cloud analytics. inControl Advice
228 includes 6 modules:

229 1. Retrospective analysis of the past few weeks, based on replay simulation technologies which
230 optimizes the patient's functional insulin therapy parameters (basal doses, insulin sensitivity
231 (ISF) factors, and carbohydrate ratios);
232 2. A CGM-based bolus calculator that enhances usual computations ($\text{bolus} = \text{CHO/CR} + (\text{SMBG-}$
233 target)/ISF - IOB) by replacing the SMBG value with a short term (30 minutes) glucose
234 prediction;
235 3. A Hypoglycemia alert system capable of predicting hypoglycemic events within the next 3
236 hours;
237 4. A long-term tracker of average glycemia using CGM to estimate changes in HbA1c;
238 5. A nighttime adviser, minimizing the risk of overnight exposure to hypoglycemia by proposing
239 adequate bedtime carbohydrate intake which is optimized to minimize the exposure to
240 hyperglycemia;
241 6. A physical activity adviser, allowing for safe physical activity without hypoglycemia and
242 without increasing the risk of rebound hyperglycemia.

243 The feasibility and safety of a prototype DSS is currently being tested in 30 adults with T1DM, both
 244 insulin pump and MDI users. This single-site clinical trial follows a non-blinded randomized crossover
 245 design, with two 48-hour
 246 observation periods where
 247 patients are exposed to a
 248 variety of meal and physical
 249 activities to challenge the
 250 patients' own control
 251 strategies and the advisory
 252 system. Preliminary analysis
 253 of the first 11 patients
 254 showed a clear trend towards
 255 increased time spent in good
 256 control (between 70-
 257 180mg/dL, which was
 258 associated with a reduction in
 259 both hyperglycemia and
 260 hypoglycemia exposure (See
 261 Figure 3). The effect size was
 262 above 0.5. Use of the
 263 decision support system also
 264 reduced glucose variability,
 265 as shown by the Low BG
 266 Index [13] and by the
 267 Average Daily Risk Range
 268 [14], with effect size of 0.4.
 269 Our previous decision-
 270 support trial [7] and these preliminary data were used in the power calculations for this study.
 271

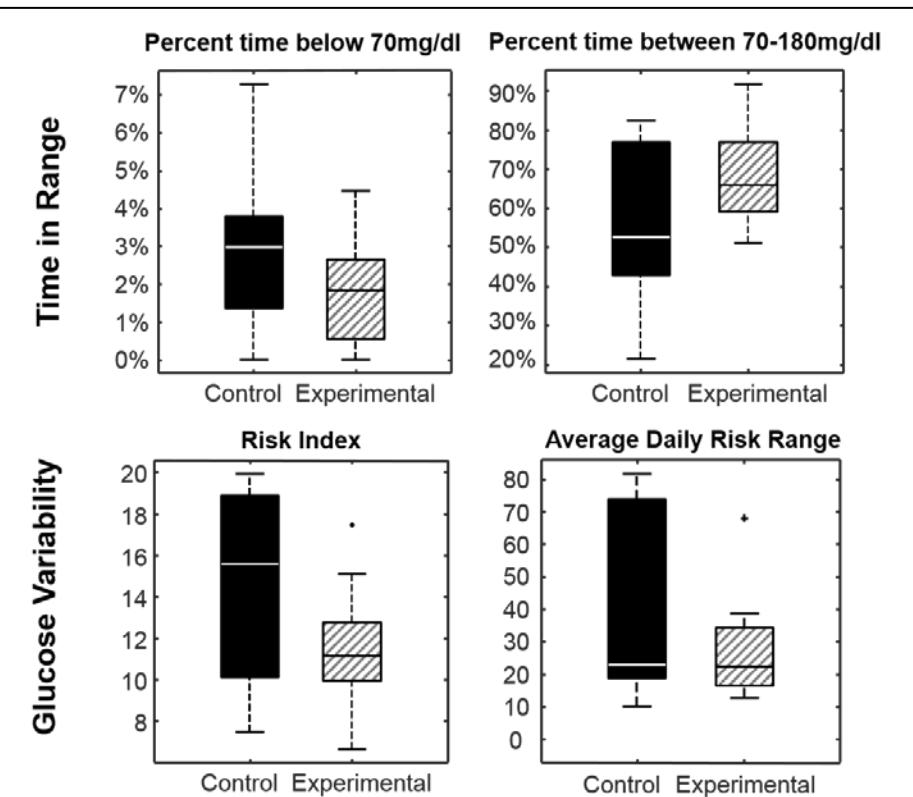


Figure 3: Results from pilot-feasibility testing of Decision Support System

272 1.3 Synopsis of Study Protocol

273 1.3.1 Study Objective

274 The objective of the study is to assess the efficacy of CGM+DSS versus CGM alone to improve
 275 glucose control in T1DM patients using multiple daily injections (MDI). The system will be deployed
 276 on a portable medical application platform (inControl Advice) and will include the following elements:

- 277 1. An MDI treatment parameters optimization routine, using a month of collected Continuous
 278 Glucose Monitoring (CGM)/insulin/meal data
- 279 2. A smart bolus calculator based on CGM glucose measurements and glycemic prediction.
- 280 3. A hypoglycemia detector with accompanying warning system and recommendation for BG
 281 monitoring and treatment.
- 282 4. A long-term average glycemia tracker
- 283 5. A bedtime button that is activated by the user before bedtime that assesses risk for overnight
 284 hypoglycemia and recommends a bedtime snack if hypoglycemia risk is elevated.
- 285 6. An exercise risk warning system, capable of predicting hypoglycemia at the onset of physical
 286 activity and advising on mitigating treatments such as carbohydrate consumption.

288 **1.3.2 Study Design**
289 Prior to outpatient use of substantially changed or updated DSS system components (as deemed by the
290 FDA), there will be pilot testing in 2-5 subjects for approximately 48 hours each in a monitored
291 transitional setting. Pilot testing may occur at multiple times during the study, dependent on whether
292 significant changes are made to the DSS that requires testing prior to home use. Upon successful
293 completion of pilot testing (assessed as no device anomalies or malfunctions and no device-related
294 adverse events), the tested DSS system may be deployed in the main protocol home setting.
295

296 The main protocol is a 12-week parallel group multi-center randomized trial designed to compare
297 CGM+DSS with CGM alone.
298

299 **1.3.3 Major Eligibility Criteria**

300 • Willingness to provide informed consent.
301 • Clinical diagnosis of type 1 diabetes, treated with insulin for at least 1 year
302 • Using basal and meal insulin (NovoLog® [insulin aspart], Humalog® [insulin lispro] or
303 Apidra® [insulin glulisine]) for Intensive Insulin Therapy including carbohydrate counting and
304 use of pre-defined parameters for glucose goal, carbohydrate ratio, and insulin sensitivity factor
305 for at least 1 month.
306 ▪
307 • Age \geq 15 years old
308 • Willingness to use the study basal insulin (Tresiba® [insulin degludec]) and meal insulin
309 (NovoLog® [insulin aspart]) for the duration of the study.
310 • Willingness to use the home or DSS-optimized carbohydrate counting parameters for all meal
311 dosing and enter the information into the inControl APP.
312

313 **1.3.4 Sample Size**
314 For pilot testing of new DSS system components, up to 30 subjects may be recruited in total across the
315 study sites. Pilot subjects may additionally participate in the main study.
316

317 We plan on 132 subjects completing the study at three clinical sites. Based on our experience with
318 similar studies, we estimate an expected 17.5% screen failures, dropouts or withdrawal due to the data
319 collection and eligibility requirements. Therefore, up to 160 subjects may sign consent for the main
320 study. Every effort will be made to recruit a broad range of ages into the study.
321

322 **1.3.5 Main Study Treatment Groups**
323 Following the initial 2 weeks of baseline blinded CGM data, subjects will be randomized in a 2:1 ratio
324 to either CGM+DSS or CGM alone.
325

326 **1.3.6 Main Study Visit and Phone Contact Schedule**
327 Subjects will have a Screening Visit with a baseline central HbA1c. They will then complete a 2-week
328 period of blinded study CGM and glucometer use to characterize baseline glycemic control. During
329 this time, they will use their home insulins dosed according to their pre-defined home parameters for
330 carbohydrate counting.
331

332 Eligible subjects will complete baseline questionnaires and be randomized to either CGM+DSS or
333 CGM alone for the remainder of the study. All subjects will continue to use the study CGM
334 (unblinded) and study glucometer and will be transitioned to the study basal insulin pens (Tresiba®
335 [insulin degludec] 100 U/mL) per product guidelines. For meal insulin, subjects with average total

336 daily insulin (TDI) <60 U/day will use NovoLog® (insulin aspart) pens capable of 0.5U increment
337 dosing and subjects with average TDI \geq 60 U/day will use NovoLog® (insulin aspart) pens capable of
338 1.0U increment dosing. All subjects will receive insulin pen training including pen differentiation
339 training. The differences between the pen for Tresiba® (insulin degludec) and for NovoLog® (insulin
340 aspart) will be emphasized to the patient. The training will include the explanation of the user
341 interfaces of both the insulin pens and inControl Advice and how the equipment interacts with the
342 other.

- 343 • Participants in the CGM+DSS group will be trained on the inControl Advice APP and will use
344 it for insulin dose calculations for the remainder of the study.
- 345 • Participants in the CGM alone group will use their pre-defined home carbohydrate counting
346 parameters for insulin dose calculations for the remainder of the study.

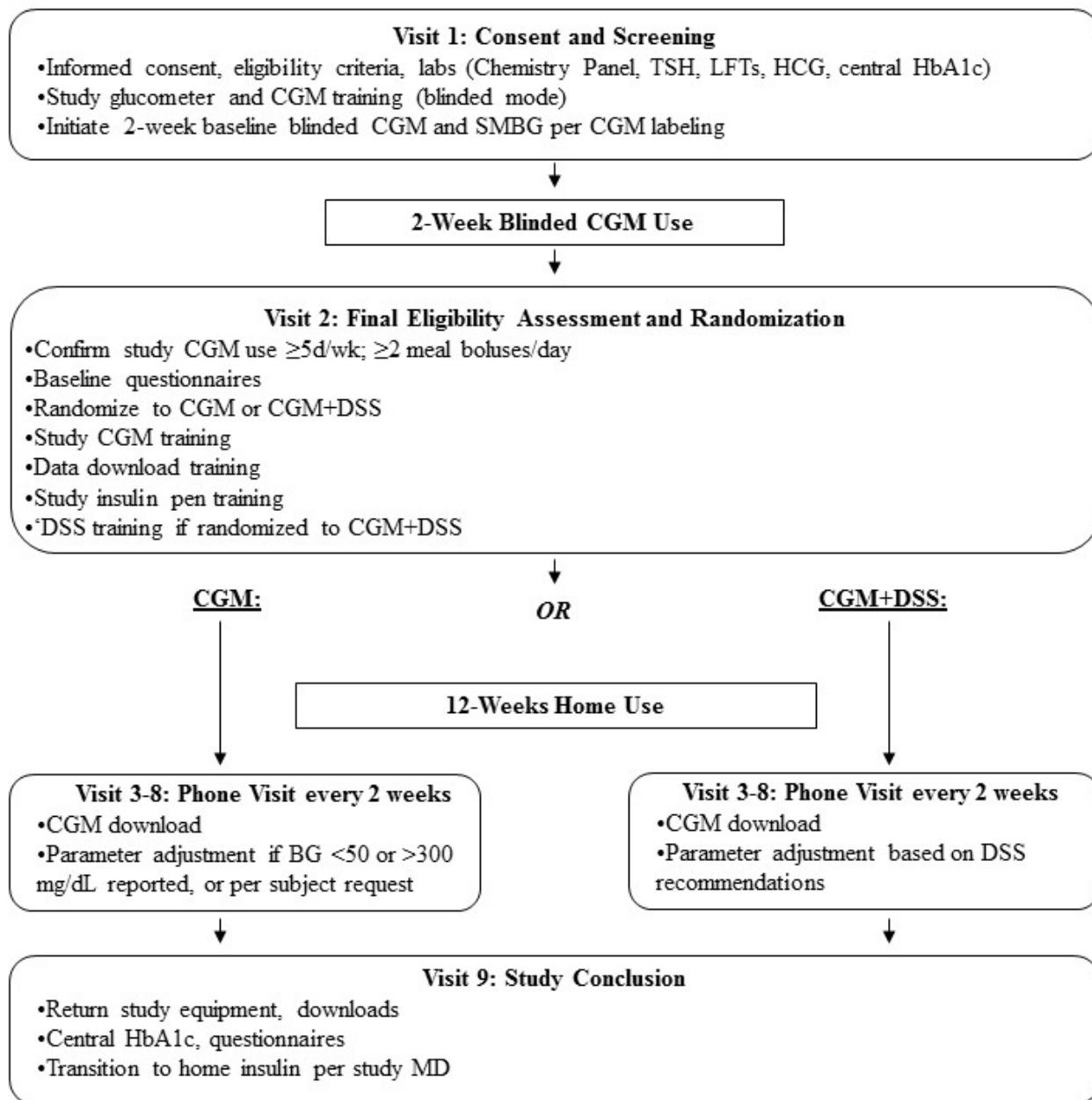
347
348 All participants have the same post-randomization clinic visit and phone contact schedule, with the
349 possible exception of additional phone contacts based on DSS-requested optimization of insulin
350 parameters for the CGM+DSS group.

- 351 • Phone contacts after: 2 weeks, 4 weeks, 6 weeks, 8 weeks, and 10 weeks for collection of CGM
352 downloads
- 353 • Alternately, emails may be used to contact study subjects.

354
355 The Study Conclusion will be a clinic visit for central HbA1c and post-intervention questionnaires.
356

358 **Figure 4: Study Flow Diagram**

359



360

361 **Table 1: Schedule of Study Visits/Phone Contacts and Examination Procedures During 12 week**
 362 **RCT Phase (Randomization at Week 0)**

	Pre	0	2w	4w	6w	8w	10w	12w
Visit or Phone	V	V	P	P	P	P	P	V, P
Comment	Screen/Enroll, Blinded CGM run-in	Rand						Conc
Eligibility Assessment	X	X						
Blinded CGM (2 weeks)	X							
HbA1c (Central lab)	X							X
Blood draw for screening labs (chemistry panel, liver function tests, and TSH)	X							
Urine or serum pregnancy test (premenopausal females not surgically sterile)	X	X						
CGM Data download		X	X	X	X	X	X	X
Assessment for BGs <50 or >300 and AEs		X	X	X	X	X	X	X
Clarke Hypoglycemia Awareness Scale, Hyperglycemia Avoidance Scale, Fear of Hypoglycemia Survey, Diabetes Distress Scale, Diabetes Specific Personality Questionnaire, and Technology Expectations Survey (CGM+DSS group)		X						
Clarke Hypoglycemia Awareness Scale, Hyperglycemia Avoidance Scale, Fear of Hypoglycemia Survey, Diabetes Distress Scale, and Technology Acceptance Survey (CGM+DSS group)								X

363

364 **1.3.7 Endpoints**

365 *Primary Efficacy Outcome:*

366 The primary efficacy outcome is increased % time within target range defined as CGM readings of 70-
367 180 mg/dL during the day and 80-140 mg/dL overnight.

368

369 *Secondary Efficacy Endpoints:*

370 Secondary efficacy endpoints include

371 1. Optimized metabolic control for the entire study population defined as:

372 a. Reduced risk for hypoglycemia, and

373 b. Reduced postprandial blood glucose variability defined by the postprandial High Blood
374 Glucose Index and by area under the postprandial CGM glucose curve;

375 2. Selective improvements for specific sub-populations defined as follows:

376 a. Reduced HbA1c without increasing risk for hypoglycemia (measured by the Low Blood
377 Glucose Index), particularly for those who were poorly controlled at the baseline
378 (baseline A1c > 8%);

379 b. Reduced incidence and risk for hypoglycemia without deterioration in HbA1c for those
380 with an A1c <8%;

381 3. Improved psycho-behavioral markers and acceptance of the system feedback by patients,
382 including:

383 a. Improved patient/parent diabetes quality of life scores;

384 b. Improved hypoglycemia perception/awareness and reduced patient/parent fear of
385 hypoglycemia in those with hypoglycemia unawareness and/or history of severe
386 hypoglycemia at the baseline.

387

388 *Main Safety Endpoints:*

- 389 • Episodes of severe hypoglycemia
- 390 • Episodes of diabetic ketoacidosis (DKA)
- 391 • Other serious adverse events

392

393 *Interim Analysis:*

394 All CGM-related study endpoints and data collected will be analyzed for the first 6 weeks of study
395 intervention in the first 40 subjects.

396

397 **1.4 General Considerations**

398 The study is being conducted in compliance with the policies described in the study policies document,
399 with the ethical principles that have their origin in the Declaration of Helsinki, with the protocol
400 described herein, and with the standards of Good Clinical Practice (GCP). (www.wma.net/en/30publications/10policies/b3/)

401 Data will be directly collected in case report forms, which will be considered the source data.

402 There is no restriction on the number of subjects to be enrolled by each site towards the overall
403 recruitment goal.

406 The protocol is considered a significant risk device study, due to the fact that the inControl Advice
407 system is experimental. Therefore, an investigational device exemption (IDE) from the U.S. Food and
408 Drug Administration (FDA) is required to conduct the study.
409

410 This study is supported by third party collaborators for the provision of study drugs, devices, and
411 software. Current study collaborators are:

412 • Novo Nordisk (Bagsværd, Denmark)
413 • TypeZero Technologies Inc., (Charlottesville, VA)

414 **2 SUBJECT SCREENING AND ENROLLMENT**

415

416 **2.1 Study Population**

417 Up to 30 pilot subjects may be enrolled for pilot DSS system testing. These subjects will sign a
418 separate Pilot Subject consent form. Pilot subjects may also participate in the main study.

419

420 Enrollment for the main study will proceed with the goal of at least 132 subjects ≥ 15 years old
421 completing the trial. A maximum of 160 subjects may be enrolled in the study in order to achieve
422 that goal.

423

424 **2.2 Eligibility and Exclusion Criteria**

425 **2.2.1 Eligibility**

426 To be eligible for the pilot and main study, a subject must meet the following criteria:

1. Willingness to provide informed consent
2. Clinical diagnosis, based on investigator assessment, of type 1 diabetes for at least one year and using insulin for at least 1 year
3. Using basal and meal insulin (NovoLog® [insulin aspart], Humalog® [insulin lispro] or Apidra® [insulin glulisine]) for Intensive Insulin Therapy including carbohydrate counting and use of pre-defined parameters for glucose goal, carbohydrate ratio, and insulin sensitivity factor for at least 1 months.
4. Age ≥ 15.0 years old
5. Willingness to use the study basal insulin (Tresiba® [insulin degludec]) and meal insulin (NovoLog® [insulin aspart]) for the duration of the study.
6. Willingness to use the home or DSS-optimized carbohydrate counting parameters for all meal dosing and enter the information into the inControl APP (for CGM+DSS group).
7. For females, not currently known to be pregnant
8. If female and sexually active, must agree to use a highly effective form of contraception to prevent pregnancy while a participant in the study. A negative serum or urine pregnancy test will be required for all premenopausal women who are not surgically sterile. Subjects who become pregnant will be discontinued from the study. Also, subjects who during the study develop and express the intention to become pregnant within the timespan of the study will be discontinued.
9. Ability to access the Internet to provide data to the clinical team or to travel to the research center so that the study equipment can be downloaded.
10. Ability to have 3G or Wi-Fi to be able to use the DSS smart bolus calculator and advice given (i.e. sleep, exercise).
11. Demonstration of proper mental status and cognition for the study
12. Investigator has confidence that the subject can successfully operate all study devices and is capable of adhering to the protocol
13. If on a non-insulin hyperglycemic therapy, stability on that therapy for the prior 3 months and willingness not to alter the therapy for the study duration.

455

456 **2.2.2 Exclusion**

457 The presence of any of the following is an exclusion for the study:

1. Medical need for chronic acetaminophen

459 2. Use of any medication that at the discretion of the clinical protocol chair is deemed to
460 interfere with the trial.

461 3. Current treatment of a seizure disorder.

462 4. Coronary artery disease or heart failure, unless written clearance is received from a
463 cardiologist.

464 5. Hemophilia or any other bleeding disorder

465 6. A known medical condition, which in the opinion of the investigator or designee, would
466 put the participant or study at risk such as the following examples:

467 a. Inpatient psychiatric treatment in the past 6 months

468 b. Presence of a known adrenal disorder

469 c. Abnormal liver function test results (Transaminase >3 times the upper limit of
470 normal)

471 d. Abnormal renal function test results (calculated GFR <60 mL/min/1.73m²).

472 e. Active gastroparesis requiring medical therapy

473 f. Uncontrolled thyroid disease (TSH undetectable or >10 mIU/L).

474 g. Abuse of alcohol or recreational drugs

475 h. Infectious process not anticipated to be resolved prior to study procedures (e.g.
476 meningitis, pneumonia, osteomyelitis, deep tissue infection).

477 i. Uncontrolled arterial hypertension (Resting diastolic blood pressure >100 mmHg
478 and/or systolic blood pressure >180 mmHg).

479 j. Uncontrolled microvascular complications such as current active proliferative
480 diabetic retinopathy defined as proliferative retinopathy requiring treatment (e.g.
481 laser therapy or VEGF inhibitor injections) in the past 12 months.

482 7. A recent injury to body or limb, muscular disorder, use of any medication, any
483 carcinogenic disease, or other significant medical disorder if that injury, medication or
484 disease in the judgment of the investigator will affect the completion of the protocol.

485 8. Current use of the following drugs and supplements:

486 k. Regular acetaminophen user, or not willing to suspend acetaminophen 24 hours
487 before and during the entire length of the trial

488 l. Oral steroids

489 m. Any other medication that the investigator believes is a contraindication to the
490 subject's participation

491 9. Participation in another pharmaceutical or device trial at the time of enrollment or during
492 the study

494 **2.3 Authorization Procedures**

495 Written informed consent must be obtained prior to performing any study specific procedures
496 with the subject that are not part of the subject's routine care.

498 For eligible subjects 18 years of age or older, the study will be discussed with the subject and the
499 subject will be provided with an Informed Consent Form to read and will be given the
500 opportunity to ask questions. If the subject agrees to participate, the Informed Consent Form
501 will be signed. A copy of the consent form will be provided to the subject and another copy will
502 be added to the subject's clinic chart.

504 For eligible subjects under 18 years of age, a parent/legal guardian (referred to subsequently as
505 "parent") will be provided with an Informed Consent Form to read and will be given the
506 opportunity to ask questions. Each subject will be given a Child Assent Form to read and discuss
507 with parents and study personnel. If the parent and child agree to participate, the Informed
508 Consent Form and Child Assent Form will be signed. A copy of the consent forms will be
509 provided to the subject and his/her parent and another copy will be added to the subject's clinic
510 chart.

511
512 Separate Informed Consent Forms will be used for the pilot study and the main study.
513

514 **2.4 Screening and Enrollment Visit Logistics**

515 Potential subjects will be evaluated for study eligibility through the elicitation of a medical
516 history, performance of a physical examination by study personnel and local laboratory testing to
517 screen for exclusionary medical conditions. Subject exclusion will be at the discretion of the
518 investigator based on study inclusion/exclusion criteria.
519

520 Subjects travelling from a distance or subjects wishing to be pre-screened for eligibility
521 may elect to have the consent +/- assent read and explained by study staff by phone. Once
522 all questions have been answered, the signed consent +/- assent will be faxed or mailed to
523 study personnel and the subject may then have pre-screening with labs performed locally
524 (e.g. LabCorp) prior to Visit 1. The consent +/- assent form will be reviewed again with
525 the subject +/- parents at Visit 1.
526

- 527 • Once all results of the screening evaluations are available, a decision will be
528 made to determine the subject eligibility for the study. The study physician will
529 have the discretion to repeat screening tests. The repeat screening tests may be
530 conducted locally (e.g. LabCorp). The subject may request a copy of any of the
531 results from the screening evaluation to review with their primary care provider.
532 Screening procedures do not need to be repeated for a subject participating in
533 both the pilot and main study if the subject proceeds to the main study within 8
534 weeks of the original screening visit. After 8 weeks, the medical history will be
535 updated, labs repeated, and eligibility criteria reevaluated. If an exclusionary
536 condition is identified, the study subject will be excluded from participation with
537 follow up and referral to their primary care physician as needed.
- 538 • If the study subject is pregnant, the study physician will discuss the results of the
539 blood test with the subject and the subject will be asked to seek confirmation of
540 the test and the appropriate medical care.
- 541 • Subjects may be re-screened at a later date if their clinical situation changes as
542 determined by the study physician. Subjects that stopped study participation due
543 to need for oral glucocorticoids (e.g. bout of poison ivy) may be re-screened and
544 re-enrolled after there is no further anticipated need for oral glucocorticoids.
545

546 Subjects may begin the Blinded CGM phase of the study before laboratory results return if the
547 study physician believes that the laboratory results are unlikely to reveal an exclusionary
548 condition.
549

550 **2.4.1 Data Collection and Testing**

551 A standard physical exam (including vital signs and height and weight measurements) will be
552 performed by the study investigator or designee (a physician, fellow, nurse practitioner or a
553 physician assistant).

554
555 The following procedures will be performed/data collected/eligibility criteria checked and
556 documented:

- 557 • Subject, and where indicated parent/guardian fully informed about the study and informed
558 consent form/assent form signed according to IRB requirements
- 559 • Inclusion and exclusion criteria assessed
- 560 • Demographics (date of birth, gender, race and ethnicity)
- 561 • Diabetic history
- 562 • Medical history
- 563 • Substance use history (drinking, smoking, and drug habits)
- 564 • Concomitant medications
- 565 • Physical examination to include:
 - 566 ○ Weight, height
 - 567 ○ Vital signs including measurement of blood pressure and pulse
- 568 • A blood sample will be drawn to send to the central laboratory for baseline HbA1c
569 determination to be used in endpoint analyses and for local assessment of a chemistry panel,
570 liver function tests and TSH.
- 571 • Urine or serum pregnancy test for all premenopausal women who are not surgically sterile
- 572

573 Screening procedures will last approximately 1-2 hours.

575 **3 PILOT TESTING OF DSS**

576

577 **3.1 Pilot Testing Overview**

578 Prior to outpatient use of substantially changed or updated DSS system components (as deemed
579 by the FDA), we will conduct a pilot study of 2-5 subjects using CGM+DSS under supervision.
580 These subjects will have an approximately 48-hour visit to an outpatient transitional setting such
581 as a hotel. The subjects will be monitored continuously with remote monitoring and will be
582 supervised by study staff with medical personnel (e.g. nurse, EMT, physician) available during
583 the entire visit. Subjects will eat at restaurants or take-out meals and participate in at least 45
584 minutes of activities such as walking or shopping each day. If there are no device anomalies or
585 malfunctions and no device-related adverse events during the pilot testing, the DSS may be
586 deployed for home use. Pilot testing may be repeated as needed after addressing software or
587 device anomalies until successful pilot testing occurs.

588

589

590 **4 2-WEEK BLINDED CGM**

591

592 **4.1 2-Week Blinded CGM Overview**

593 Prior to randomization, the subject will initiate 2 weeks of home use of blinded CGM for
594 characterization of baseline glycemic control and collection of baseline CGM data.
595 The subject will use carbohydrate counting per their usual routine with their usual home insulins
596 during this time.

597 The subject will receive supplies for blood glucose and ketone testing during this period:

- 599 • Blood glucose testing
 - 600 ○ Subjects will be provided with a study blood glucose meter, test strips, and
 - 601 ○ standard control solution to perform quality control (QC) testing at home per
 - 602 ○ manufacturer guidelines.
 - 603 ○ All study blood glucose meters will be QC tested during all office visits. A tested
 - 604 ○ meter will not be used in a study if it does not read within the target range at each
 - 605 ○ concentration per manufacturer labeling. The subject will be instructed to contact
 - 606 ○ study staff for a replacement of the meter, test strips, and control solution if a
 - 607 ○ meter fails QC testing at home.
 - 608 ○ The blood glucose meter training will include instructions to follow labeling
 - 609 ○ instructions with regards to the glucose meter and test strips.
 - 610 ○ Subjects will be reminded to use the study blood glucose meter for all fingerstick
 - 611 ○ blood glucose measurements during the trial.
 - 612 ○ Subjects will be given guidelines for treatment of low or high blood glucose
 - 613 ○ Subjects will be asked to perform fingerstick BG testing according to the CGM
 - 614 ○ manufacturer guidelines and as needed to follow study guidelines for the
 - 615 ○ treatment of low or high blood glucose.
- 616 • Blood ketone testing
 - 617 ○ Subjects will be provided with a study blood ketone meter and test strips. All
 - 618 ○ study blood ketone meters will be QC tested at the start of the study with at least
 - 619 ○ two different concentrations of control solution if available. A tested meter will

620 not be used in a study if it does not read within the target range at each
621 concentration per manufacturer labeling.
622 o All study blood ketone meters will be QC tested during all office visits. A tested
623 meter will not be used in a study if it does not read within the target range at each
624 concentration per manufacturer labeling. The subject will be instructed to contact
625 study staff for a replacement of the meter, test strips, and control solution if a
626 meter fails QC testing at home.
627 o Subjects will be instructed to perform blood ketone testing as described in Section
628 7.1.2.2.
629 o Subjects will be given guidelines for treatment of elevated blood ketones
630 • Subjects will be required to have a home glucagon emergency kit. Subjects who currently
631 do not have one will be given a prescription for the glucagon emergency kit.
632

633 **Blinded CGM Use**

634 At the screening visit, a CGM sensor will be placed. For subjects not currently using a CGM, the
635 study CGM receiver will be blinded so that the participant is not able to see the CGM glucose
636 values. The participant will be instructed on sensor use including insertion of a new sensor as
637 recommended by the manufacturer (or sooner if the sensor comes out). Additional sensors will be
638 provided. Subjects that currently use a CGM may use the study CGM in the unblinded mode to
639 maintain usual care.
640

641 Participants will be informed that in order to be eligible for the randomized trial, the study CGM
642 must be used on a minimum of 10 out of 14 days.
643

644 **4.1.1 Blinded CGM Use Assessment**

645 Enrolled participants will return approximately 19 ± 5 days after screening to assess the blinded
646 CGM wear. The purpose of the visit will include the following:
647

- 648 • Assessment of compliance with the use of the CGM
- 649 • Assessment of skin reaction in areas where a CGM sensor was worn
- 650 •
- 651 • CGM download.
- 652 • Collection and assessment of adverse events, adverse device effects, and device issues
- 653 • Assessment of occurrence of $BG < 50$ or > 300 mg/dL. (If $BG < 50$ or > 300 mg/dL
654 occurred during the blinded CGM use, the Dexcom data will be reviewed by the study
655 physician to evaluate whether an insulin parameter adjustment is needed. Adjustments
will be made prior to randomization to the CGM+DSS or CGM alone group.
656

657 The CGM data will be downloaded and reviewed to assess whether the participant has used the
658 CGM on at least 10 out of 14 days.
659

660 Participants who are unable to meet the CGM compliance requirement will be withdrawn from
661 the study, unless the investigator believes that there were extenuating circumstances that
662 prevented successful completion. In such cases, the subject may be asked to repeat this portion of
663 the study.

664 **5 Randomized Trial**

665

666 **5.1 Randomization Visit**

667 The Randomization Visit will occur concurrently with the Blinded CGM Use Assessment.

669 A urine pregnancy test will be repeated for all premenopausal women who are not surgically
670 sterile. The test must be negative to be eligible for continuation in the study.

672 Subjects will complete the following baseline questionnaires:

- Fear of Hypoglycemia Survey (HFS-II)
- Hyperglycemia Avoidance Scale
- Diabetes Distress Scale
- Clarke's Hypoglycemia Awareness scale
- Diabetes Specific Personality Questionnaire

679 The home insulin regimen will be reviewed and the subject will be transitioned to the study
680 insulins consisting of Tresiba® (insulin degludec) (100 U/mL) for basal insulin dosing and
681 NovoLog® (insulin aspart) (100 U/mL) for meal and correction insulin dosing. The investigators
682 making the basal insulin recommendations will be physicians knowledgeable in insulin titration.
683 The starting dose of Tresiba will be the same unit dose as the total daily long acting unit dose, as
684 per the product manufacturer guidelines for adults already on insulin therapy.

685

686 To mitigate the risk of hypoglycemia when transitioning from the home basal insulin to Tresiba,
687 subjects will be asked to perform fingerstick blood glucose measurements a minimum of four
688 times daily for the first 2 weeks of Tresiba use (premeal and bedtime, for CGM calibrations, to
689 confirm low or high CGM alarms, and for symptoms of low or high blood sugar). The subjects
690 will have the additional protection of wearing a CGM system, approved for non-adjunct use
691 (Dexcom G5), with the low alarm set to 70 mg/dL and the high alarm set to 300 mg/dL. These
692 alerts will allow the subject to time the required fingersticks to when the risk to the subject is
693 highest. During the first 2 weeks of Tresiba use, subjects will be instructed to verify that their
694 CGM functions before bedtime, and strongly advised to measure their blood glucose around 3am
695 using the study provided blood glucose meter.

696

697 The study insulin degludec (Tresiba®) will be available in a PenFill® cartridge which is inserted
698 into a NovoPen® 5 Plus pen. The study insulin aspart (NovoLog®) will be available in a
699 PenFill® cartridge which is inserted into a NovoPen Echo® Plus or NovoPen® 5 Plus pen. The
700 individual PenFill® is labelled with the drug type. The differences between the pen for Tresiba®
701 (insulin degludec) and for NovoLog® (insulin aspart) will be emphasized to the patient. The
702 insulin delivery device containing NovoLog® (insulin aspart) PenFill® will deliver in 0.5 U
703 increments for subjects with average total daily insulin <60 U/day and in 1 U increments for
704 subjects with average total daily insulin ≥60 U/day. Pen needles will also be provided. The
705 Instruction for Use for the pens will be reviewed with the subject and the subject will
706 demonstrate proper insulin pen priming, injection technique and the ability to change the insulin
707 cartridge to the training staff. If the subject receives a prandial insulin recommendation that is
708 not capable of being delivered by the pen, the subject will be asked to round to the next closest
709 number per the clinical scenario (e.g. if CGM arrow flat or downward, round down; if CGM

710 arrow upward, round up). Storage and in use conditions for the insulins will be per the trial
711 product label. Initial once daily doses of Tresiba® (insulin degludec) will be determined per the
712 product guidelines.

713
714 Subjects will be advised that they may experience more high or low blood sugars when
715 switching from the home insulins to the study insulins. Subjects will be provided with study staff
716 contact information and will be instructed to contact study staff for any concerns regarding an
717 increase in high or low blood sugars.

718
719 Subjects will be provided with study supplies and will be asked to perform fingerstick blood
720 glucose measurements a minimum of four times daily for the first 2 weeks of using the study
721 insulins (premeal and bedtime, for CGM calibrations, to confirm low or high CGM alarms, and
722 for symptoms of low or high blood sugar). Thereafter, subjects will be asked to perform
723 fingersticks in accordance with the labeling of the study CGM device and as needed to follow
724 study guidelines for the treatment of low or high blood glucose. Subjects will continue to use the
725 study basal and meal insulin pens for the remainder of the study.

726 727 **5.1.1 CGM Training**

728 The participant will be provided with sensors and instructed to use the CGM daily for the
729 remainder of the trial. Depending on the subject's prior CGM experience, the subject will have
730 approximately 1 hour of training on how to use CGM for daily diabetes management using the
731 manufacturer's training materials. Product labeling for the Dexcom G5 mobile system states that
732 it is indicated for the management of diabetes in persons age 2 years and older. It is designed to
733 replace fingerstick blood glucose testing for diabetes treatment decisions. Per the product
734 guidelines, fingersticks are required for calibration, or if symptoms or expectations do not match
735 readings, or when taking medications containing acetaminophen.

736
737 During the CGM training session, subjects will view the interactive Dexcom G5 mobile training
738 tutorial that is available on the Dexcom website:
739 (https://s3-us-west-2.amazonaws.com/dexcommisc/tutorial/story_html5.html). Of relevance,
740 proper calibration timing and technique is described in the training tutorial. This training session
741 also covers but is not limited to the following topics:

- 742 • Dexcom G5 mobile components
- 743 • Display device options
- 744 • Setting high/low alerts
- 745 • Inserting sensor
- 746 • Starting sensor session
- 747 • Entering BG meter value
- 748 • Ending sensor session

749 750 **5.1.2 Randomization**

751 Eligible subjects will be randomly assigned to one of two treatment groups:

- 752 1. CGM+DSS Group
- 753 2. CGM alone Group

754
755 Subjects randomized to CGM+DSS will complete an additional baseline questionnaire:

756 • Technology Expectations Survey
757

758 **5.1.3 CGM Data Downloads**

759 Subjects in both groups will be provided with the software needed to download the study CGM
760 and transmit the data to study personnel and will be asked to do so prior to scheduled phone
761 contacts for the remainder of the study.

762 **5.2 Procedures for the CGM+DSS Group**

763 **5.2.1 DSS Training**

764 Subjects randomized to the CGM+DSS group will receive DSS training.

765 The subject will be trained by qualified study staff to use the DSS (inControl Advice) APP to
766 calculate insulin doses for meals and corrections. Prior to initial use, the inControl system will be
767 initialized by a study team member with each subject's individual insulin dosing parameters,
768 including carbohydrate ratio, insulin sensitivity factor and basal insulin dose.

769 Study team members will train the subject in performing specific tasks including the following:

- 770 • The study team will confirm the carbohydrate counting parameters entered in the system
771 with the study physician.
- 772 • How to activate the "meal" screen of the inControl system any time insulin will be given
773 with a meal and the "add correction" screen any time additional correction insulin is
774 desired
- 775 • How to use the NFC communication on the insulin pens to inform and confirm on the
776 inControl system that an insulin dose was injected.
- 777 • How to inform the system of hypoglycemia treatment via a "hypoglycemia treatment"
778 button on the inControl user interface after glucose is consumed that is not accompanied
779 by an insulin bolus
- 780 • What to do when exercising while using the system and how to react to the exercise
781 advice given
- 782 • How to react to the hypoglycemia risk alarm.
- 783 • How to access the bedtime button and react to the possible advice for a bedtime snack.

784 The subject will also be instructed to contact study staff during periods of illness with an
785 elevated temperature >101.5 degrees Fahrenheit (38.6 degrees Celsius), periods of significant
786 illness, or during periods of use of medications such as epinephrine (e.g. for the emergency
787 treatment of a severe allergic reaction or asthma attack) or oral or injectable glucocorticoids to
788 determine if study procedures should be temporarily discontinued.

789 Subjects will be given the inControl Advice device and will be provided with sufficient supplies
790 to last until the final clinic visit.

791 **5.3 Procedures for the CGM Group**

792 Subjects in the CGM Group will continue to use the study CGM and will be provided with
793 sufficient supplies to last until the final clinic visit.

794

802 The subject will also be instructed to contact study staff during periods of illness with an
803 elevated temperature >101.5 degrees Fahrenheit (38.6 degrees Celsius), periods of significant
804 illness, or during periods of use of medications such as epinephrine (e.g. for the emergency
805 treatment of a severe allergic reaction or asthma attack) or oral or injectable glucocorticoids to
806 determine if study procedures should be temporarily discontinued.
807

808 **5.4 Follow-up Phone Contacts for Both Groups**

809 The schedule for remaining follow-up visits and phone contacts is the same for both treatment
810 groups. A primary purpose of the contacts will be to collect the CGM downloads and to assess for
811 BGs <50 or >300 and any AEs.
812

813 **5.4.1 Phone Contacts**

814 A phone call will be made at the following times:

- 815 • 2 weeks (± 3 days)
- 816 • 4 weeks (± 1 week)
- 817 • 6 weeks (± 1 week)
- 818 • 8 weeks (± 1 week)
- 819 • 10 weeks (± 1 week)

820 The following procedures will be performed in both groups during each phone contact, unless
821 otherwise specified:

- 823 • Assessment of compliance with study device use
- 824 • Assessment of occurrence of BG <50 or >300 mg/dL.
- 825 • CGM download.
- 826 • Collection and assessment of adverse events, adverse device effects, and device issues

827 **5.4.2 Study Conclusion Visit**

828 The following procedures will be performed in both groups at the study conclusion visit:

- 829 • All study devices will be returned and downloaded
- 830 • Blood will be drawn for central HbA1c assessment.

831 Subjects will complete the following post-intervention questionnaires:

- 832 • Fear of Hypoglycemia Survey (HFS-II)
- 833 • Hyperglycemia Avoidance Scale
- 834 • Diabetes Distress Scale
- 835 • Clarke's Hypoglycemia Awareness scale
- 836 • Technology Acceptance Survey (CGM+DSS group)

837 Study participants will meet with the study physician and the Dexcom data will be reviewed. The
838 subject will be instructed on how to transition back to the home insulins and the doses to be used.
839 Subjects will be informed that there may be a risk of severe hypoglycemia and/or severe
840 hyperglycemia during the transition back to the subject's usual home basal insulin from the study
841 basal insulin (Tresiba). They will be asked to perform fingerstick BGs before meals, at bedtime,
842 and at 3AM for the first 3 days on the home insulin.
843

847 **5.5 Follow-up Phone Contacts for Both Groups: Post-study**

848 A follow-up safety call will be made with the subject within 3-7 days to assess for any problems
849 transitioning to the home insulin, including any episodes of BG 300 mg/dL.

850 **6 QUESTIONNAIRES**

851 **6.1 Introduction**

853 The following questionnaires will be completed at the randomization visit:

- 854 • Diabetes Specific Personality Questionnaire
- 855 • Clarke Hypoglycemia Awareness Scale
- 856 • Fear of Hypoglycemia Survey (HFS-II)
- 857 • Hyperglycemia Avoidance Scale
- 858 • Diabetes Distress Scale
- 859 • Technology Expectations Survey (CGM+DSS group only)

861 The following questionnaires will be completed at the final visit at week 12:

- 862 • Clarke's Hypoglycemia Awareness Scale
- 863 • Fear of Hypoglycemia Survey (HFS-II)
- 864 • Hyperglycemia Avoidance Scale
- 865 • Diabetes Distress Scale
- 866 • Technology Acceptance Survey (CGM+DSS group only)

868 Each questionnaire is described briefly below. The procedures for administration are described in the
869 study procedures manual.

870 **6.2 Diabetes Specific Personality Questionnaire**

871 The Diabetes Specific Personality Questionnaire (24) is based on the original Six Factor Personality
872 Questionnaire (25), a well-validated measure that was adapted for the diabetes-specific version of the
873 questionnaire. The SFPQ is a measure of six personality dimensions each consisting of three facet
874 scales, measured by 108 Likert items. The SFPQ facet scales are organized in terms of six factor
875 scales.

877 Administration time is approximately 15 minutes.

878 **6.3 Clarke's Hypoglycemia Awareness Scale**

879 The scale (26) comprises eight questions characterizing the participant's exposure to episodes of
880 moderate and severe hypoglycemia. It also examines the glycemic threshold for, and symptomatic
881 responses to, hypoglycemia. A score of four or more on a scale of 0 to 8 implies impaired awareness of
882 hypoglycemia.

883 Administration time is approximately 5 minutes.

884 **6.4 Hypoglycemia Fear Survey (HFS-II) / Low Blood Sugar Survey**

885 The Hypoglycemia Fear Survey-II (27) was developed to measure behaviors and worries related to fear
886 of hypoglycemia in adults with type 1 diabetes. It is composed of 2 subscales, the Behavior (HFS-B)
887 and Worry (HFS-W). HFS-B items describe behaviors in which patients may engage to avoid
888 hypoglycemic episodes and/or their negative consequences (e.g., keeping blood glucose levels above
889 150 mg/dL, making sure other people are around, and limiting exercise or physical activity). HFS-W
890 items describe specific concerns that patients may have about their hypoglycemic episodes (e.g., being
891 alone, episodes occurring during sleep, or having an accident).

897 Administration time is approximately 10 minutes.

898

899 **6.5 Hyperglycemia Avoidance Survey (HAS) / High Blood Sugar Survey**

900 The HAS (28) reliably quantifies affective and behavioral aspects of hyperglycemia avoidance and is
901 used to assess the extent of potentially problematic avoidant attitudes and behaviors regarding
902 hyperglycemia in people with Type 1 diabetes mellitus (T1DM).

903 Administration time is approximately 10 minutes.

904

905 **6.6 Diabetes Distress Scale**

906 The Diabetes Distress Scale (29) is a measure of diabetes-related emotional distress and consists of a
907 scale of 28 items. These include 7 items from each of four domains central to diabetes-related
908 emotional distress. Patients rate the degree to which each item is currently problematic for them on a
909 6-point Likert scale, from 1 (no problem) to 6 (serious problem).

910

911 Administration time is approximately 10 minutes.

912

913 **6.7 Technology Expectation and Technology Acceptance Surveys**

914 The Technology Expectation and Technology Acceptance Surveys were developed for a Bionic
915 Pancreas camp study (30). The 38 items in the Questionnaire were based on interviews conducted with
916 individuals who had participated in previous Bionic Pancreas trials about their experience regarding
917 the Bionic Pancreas. It was subsequently adapted to assess these same measures for the inControl
918 Advice system. It assesses both positive and negative experiences with inControl, including blood
919 glucose management, device burden, and overall satisfaction. Items are rated on a 5-point scale.

920

921 Administration time is approximately 10 minutes.

922 **7 SAFETY MEASURES**

923

924 **7.1 Safety Measures**

925

926 **7.1.1 CGM Calibration**

927 Throughout the study, subjects will be instructed to calibrate the study CGM in accordance with
928 manufacturer labelling.

929

930 **7.1.2 Safety Measures**

931

932 **7.1.2.1 Hypoglycemia Safety Protocol**

933 All subjects will be required to set the CGM hypoglycemia threshold alarm to a value no less than 70
934 mg/dL.

935

936 If a subject receives a CGM hypoglycemia threshold alarm or notes that the CGM glucose is <70
937 mg/dL, confirmatory fingerstick testing will be recommended and the subject will be instructed to treat
938 hypoglycemia with ~16 grams of fast-acting oral glucose.

939

940 **7.1.2.2 Hyperglycemia Safety Protocol**

941 Subjects will be required to set the CGM hyperglycemia threshold alarm to a value no greater than 300
942 mg/dL.

943

944 If a subject receives a CGM hyperglycemia threshold alarm or notes that the CGM glucose is ≥ 300
945 mg/dL, confirmatory fingerstick testing will be recommended.

946

947 If a subject's CGM reading is ≥ 300 mg/dL for over 1 hour, or ≥ 400 mg/dL at any point, the subject
948 will be instructed to take the following steps:

949

950 • Perform a blood ketone measurement with the study ketone meter. Subjects will also be
951 encouraged to check ketones if they are clinically concerned.

952 • Correction insulin may be taken per the subject's usual routine (CGM group) or per the
953 inControl Advice recommendation (CGM+DSS group).

954 • Subjects will be instructed to administer correction insulin per the subject's usual routine
955 (CGM group) or per the inControl Advice recommendation (CGM+DSS group) for ketones
956 ≥ 0.6 mmol/L and to additionally notify study staff for ketones ≥ 3.0 mmol/L.

957

958 **7.1.2.3 Study System Failure**

959 If the inControl Advice APP stops working, subjects will be instructed to resume their regular home
960 insulin therapy until he/she can contact study staff for confirmation of the current carbohydrate
counting parameters or until the study system can be repaired or replaced.

961 **8 ADVERSE EVENTS, DEVICE ISSUES, POTENTIAL RISKS, AND STOPPING RULES**

962 **8.1 Adverse Event Definition**

963 A reportable adverse event for this protocol includes any untoward medical occurrence that meets
964 criteria for a serious adverse event or any unanticipated medical occurrence in a study subject that is
965 study- or device-related, including severe hypoglycemia as defined below and severe
966 hyperglycemia/diabetic ketoacidosis (DKA) as defined below. Skin reactions from sensor placement
967 are only reportable if severe and/or required treatment.

968
969 Hypoglycemic events are recorded as Adverse Events (severe hypoglycemic event) if the event
970 required assistance of another person due to altered consciousness, and required another person to
971 actively administer carbohydrate, glucagon, or other resuscitative actions. This means that the
972 participant was impaired cognitively to the point that he/she was unable to treat himself/herself, was
973 unable to verbalize his/ her needs, was incoherent, disoriented, and/or combative, or experienced
974 seizure or coma. These episodes may be associated with sufficient neuroglycopenia to induce seizure
975 or coma. If plasma glucose measurements are not available during such an event, neurological
976 recovery attributable to the restoration of plasma glucose to normal is considered sufficient evidence
977 that the event was induced by a low plasma glucose concentration.

978
979 Hyperglycemic events are recorded as Adverse Events (severe hyperglycemic event) if the event
980 involved DKA, as defined by the Diabetes Control and Complications Trial (DCCT) and described
981 below, or in the absence of DKA if evaluation or treatment was obtained at a health care provider
982 facility for an acute event involving hyperglycemia with ketosis.

983
984 Hyperglycemic events are classified as DKA if the following are present:

- 985 • Symptoms such as polyuria, polydipsia, nausea, or vomiting;
- 986 • Serum ketones >1.5 mmol/L or large/moderate urine ketones;
- 987 • Either arterial blood pH <7.30 or venous pH <7.24 or serum bicarbonate <15 ; and
- 988 • Treatment provided in a health care facility

989 **8.2 Recording of Adverse Events**

990 Throughout the course of the study, all efforts will be made to remain alert to possible adverse events
991 or untoward findings. The first concern will be the safety of the study participant, and appropriate
992 medical intervention will be made.

993
994 All reportable adverse events whether volunteered by the subject, discovered by study personnel
995 during questioning, or detected through physical examination, laboratory test, or other means will be
996 reported on an adverse event form online. Each adverse event form is reviewed by the Medical
997 Monitor at the Coordinating Center to verify the coding and the reporting that is required.

998
999 The study investigator will assess the relationship of any adverse event to be related or unrelated by
1000 determining if there is a reasonable possibility that the adverse event may have been caused by the
1001 study intervention.

1002
1003 To ensure consistency of adverse event causality assessments, investigators should apply the following
1004 general guideline when determining whether an adverse event is related:

1008 **Yes**
1009 There is a plausible temporal relationship between the onset of the adverse event and the study
1010 intervention, and the adverse event cannot be readily explained by the subject's clinical state,
1011 intercurrent illness, or concomitant therapies; and/or the adverse event follows a known pattern of
1012 response to the study intervention; and/or the adverse event abates or resolves upon discontinuation of
1013 the study intervention or dose reduction and, if applicable, reappears upon re-challenge.
1014
1015 **No**
1016 Evidence exists that the adverse event has an etiology other than the study intervention (e.g.,
1017 preexisting medical condition, underlying disease, intercurrent illness, or concomitant medication);
1018 and/or the adverse event has no plausible temporal relationship to study intervention.
1019
1020 The intensity of adverse events will be rated on a three-point scale: (1) mild, (2) moderate, or (3)
1021 severe. It is emphasized that the term severe is a measure of intensity: thus, a severe adverse event is
1022 not necessarily serious. For example, itching for several days may be rated as severe, but may not be
1023 clinically serious.
1024
1025 Adverse events will be coded using the MedDRA dictionary.
1026
1027 All adverse events including adverse events that continue after the study participant's discontinuation
1028 or completion of the study will be followed until their medical outcome is determined or until no
1029 further change in the condition is expected.
1030
1031 **8.3 Reporting Serious Adverse Events, Unexpected Adverse Device Effects, Serious Adverse**
1032 **Reactions (SAR) and Serious Adverse Drug Reaction (SARD)**
1033 Any untoward occurrence that:
1034

- Results in death.
- Results in transmission of a bloodborne pathogen.
- Is life-threatening; (a non-life-threatening event which, had it been more severe, might have
1037 become life-threatening, is not necessarily considered a serious adverse event).
- Requires inpatient hospitalization or prolongation of existing hospitalization.
- Results in persistent or significant disability/incapacity or substantial disruption of the ability to
1040 conduct normal life functions.
- Is a congenital anomaly or birth defect
- Is considered a significant medical event by the investigator based on medical judgment (e.g.,
1043 may jeopardize the participant or may require medical/surgical intervention to prevent one of
1044 the endpoints listed above).

1045
1046 An Unanticipated Adverse Device Effect is defined as any serious adverse effect on health or safety or
1047 any life-threatening problem or death caused by, or associated with, a device, if that effect, problem, or
1048 death was not previously identified in nature, severity, or degree of incidence in the investigational
1049 plan or application (including a supplementary plan or application), or any other unanticipated serious
1050 problem associated with a device that relates to the rights, safety, or welfare of subjects (21 CFR
1051 812.3(s)). Reporting timelines are noted in Table 2.

1052 Subjects will be instructed to notify the study team immediately if they become pregnant during the
 1053 trial. Pregnancies will be reported to third party collaborators within 15 calendar days of the study
 1054 team being notified of the event. However, pregnancy will not be considered an adverse event in this
 1055 trial. Pregnancy complications will be recorded as adverse event(s).
 1056

1057 Each principal investigator is responsible for reporting serious study-related adverse events and
 1058 abiding by any other reporting requirements specific to his/her Institutional Review Board and third
 1059 party collaborators.
 1060

Type of Event	To whom will it be reported:	Time Frame for Reporting	How reported?
Any event resulting in death that is deemed DEFINITELY related to (caused by) study participation	IRB Third party collaborators	Within 24 hours	IRB Online and phone call
Serious Adverse Event , Unexpected Adverse Event, Serious Adverse Reactions (SAR), Serious Adverse Drug Reaction (SARD)	IRB Third party collaborators	Within 7 calendar days from the time, the study team received knowledge of the event. <i>Timeline includes submission of signed hardcopy of AE form.</i>	IRB Online
Unanticipated Problems that are not adverse events or protocol violations. This would include a Data Breach.	IRB Third party collaborators	Within 10 day calendar days of the study team receiving knowledge of the event	IRB Online
Protocol Violations/ Noncompliance The IRB only requires that MAJOR violation be reported, unless otherwise required by the sponsor OR Enrollment Exceptions	IRB	Within 7 calendar days from the time, the study team received knowledge of the event.	Unanticipated Problem report form.
Data Breach	IRB	Within 7 calendar days from the time, the study team received knowledge of the event.	Protocol Violation, Noncompliance and Enrollment Exception Reporting Form

OUTSIDE SPONSOR	The UVa Corporate Compliance and Privacy Office, a ITC: if breach involves electronic data- Police if breach includes items that are stolen: Stolen on UVA Grounds OR Stolen off UVa Grounds- contact police department of jurisdiction of last known location of PHI	As soon as possible and no later than 24 hours from the time, the incident is identified. As soon as possible and no later than 24 hours from the time, the incident is identified. IMMEDIATELY.	UVa Corporate Compliance and Privacy Office- Phone 924-9741 ITC: Information Security Incident Reporting procedure, http://www.itc.virginia.edu/security/reporting.html UVa Police- Phone- (434) 924-7166
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UVA PI IDE			
Life-threatening and/or fatal unexpected events related or possibly related to the use of the investigational device.	FDA Third party collaborators	Within 7 calendar days of the study team learning of the event	Form FDA 3500A (MedWatch) or narrative
Serious, unexpected and related or possibly related adverse events	FDA Third party collaborators	Within 15 calendar days after the study team receives knowledge of the event	Form FDA 3500A (MedWatch) or narrative
For Device Studies: Unanticipated adverse device effects (internal or external)	FDA Third party collaborators	Within 10 working days of the study team receiving knowledge of the event	Form FDA 3500A (MedWatch) or narrative
All adverse events	FDA	Annually	IDE annual report

1061 **Table 2: Adverse Event Reporting Table**

1062

1063

8.4 Device Issues

1064

1065

1066

1067

1068

1069

8.5 Potential Risks and Side Effects

1070

Loss of confidentiality is a potential risk; however, data are handled to minimize this risk.

1071

Hyperglycemia and ketone formation and hypoglycemia are always a risk in subjects with type 1 diabetes and subjects will be closely monitored for this. When wearing sensors and insulin infusion

1073 sets there is always a risk of skin rashes, allergic reactions to the tape, or infections at the insertion site.
1074 There is always a risk for a small piece of a sensor remaining under the skin or a sensor or infusion set
1075 breaking off under the skin.

1076

1077 **8.5.1 Venipuncture Risks**

1078 A hollow needle/plastic tube will be placed in the arm for taking blood samples. Blood draws can
1079 cause some common reactions like pain, bruising, or redness at the sampling site. Less common
1080 reactions include bleeding from the sampling site, formation of a small blood clot or swelling of the
1081 vein and surrounding tissues, and fainting.

1082

1083 **8.5.2 Fingerstick Risks**

1084 About 1 drop of blood will be removed by fingerstick for measuring blood sugars and sometimes
1085 HbA1c or other tests. This is a standard method used to obtain blood for routine hospital laboratory
1086 tests. Pain is common at the time of lancing. In about 1 in 10 cases, a small amount of bleeding under
1087 the skin will produce a bruise. A small scar may persist for several weeks. The risk of local infection
1088 is less than 1 in 1000. This should not be a significant contributor to risks in this study as fingersticks
1089 are part of the usual care for people with diabetes.

1090

1091 **8.5.3 Subcutaneous Catheter Risks (CGM)**

1092 Subjects using the CGM will be at low risk for developing a local skin infection at the site of the
1093 sensor needle placement. If a catheter is left under the skin for more than 24 hours it is possible to get
1094 an infection where it goes into the skin, with swelling, redness and pain. There may be bleeding where
1095 the catheter is put in and bleeding under the skin causes a bruise (1 in 10 risk).

1096

1097 Study staff should verbally alert the subject that on rare occasions, the CGM may break and leave a small
1098 portion of the sensor under the skin that may cause redness, swelling or pain at the insertion site. The
1099 subject should be further instructed to notify the study coordinator immediately if this occurs.

1100

1101 **8.5.4 Risk of Hypoglycemia**

1102 As with any person having type 1 diabetes and using insulin, there is always a risk of having a low
1103 blood sugar (hypoglycemia). The frequency of hypoglycemia should be no more and possibly less
1104 than it would be as part of daily living. Symptoms of hypoglycemia can include sweating, jitteriness,
1105 and not feeling well. Just as at home, there is the possibility of fainting or seizures (convulsions) and
1106 that for a few days the subject may not be as aware of symptoms of hypoglycemia. A CGM
1107 functioning poorly and significantly over-reading glucose values could lead to inappropriate insulin
1108 delivery. Inadvertent mix-ups of short-acting and long-acting insulins could contribute to the risk of
1109 hypoglycemia.

1110

1111 **8.5.5 Risk of Hyperglycemia**

1112 Hyperglycemia and ketonemia could occur if insulin delivery is attenuated or suspended for an
1113 extended period. A CGM functioning poorly and significantly under-reading glucose values could
1114 lead to an inappropriate insulin recommendation. Inadvertent mix-ups of short-acting and long-acting
1115 insulins could contribute to the risk of hyperglycemia.

1116

1117 **8.5.6 Risk of Device Reuse**

1118 The study CGM system is labeled for single-patient use only. The sensor (the component of the system
1119 that enters the skin) will be single-patient use only. The transmitter and receiver may be reused during
1120 the study after cleaning the device using a hospital-approved cleaning procedure. The transmitter is

1121 attached to the sensor but does not enter the skin and the receiver is a hand held device. Subjects will
1122 be informed that FDA or relevant national authorities have approved these devices for single use and
1123 that by using them among multiple patients, bloodborne pathogens (i.e. Hepatitis B) may be spread by
1124 multiple users.

1125

1126 **8.5.7 Psychosocial Questionnaires**

1127 As part of the study, participants will complete psychosocial questionnaires which include questions
1128 about their private attitudes, feelings and behavior related to diabetes. It is possible that some people
1129 may find these questionnaires to be mildly upsetting. Similar questionnaires have been used in
1130 previous research and these types of reactions have been uncommon.

1131

1132 **8.5.8 Other Risks**

1133 Some subjects may develop skin irritation or allergic reactions to the adhesives used to secure the
1134 CGM. If these reactions occur, different adhesives or “under-taping” (such as with IV 3000,
1135 Tegaderm, etc.) will be tried, sites will be rotated frequently, and a mild topical steroid cream or other
1136 medication may be required.

1137 Whenever the skin is broken there is the possibility of an infection. The CGM sensors are inserted
1138 under the skin. It is possible that any part that is inserted under the skin may cause an infection. These
1139 occur very infrequently, but, if an infection was to occur, oral and/or topical antibiotics can be used.
1140 The risk of skin problems could be greater if you use a sensor for longer than it is supposed to be used.
1141 Therefore, participants will be carefully instructed about proper use of the sensor.

1142 Data downloaded from the CGM and blood glucose and ketone meters will be collected for the study
1143 as measures of diabetes self-management behaviors. Some people may be uncomfortable with the
1144 researchers' having such detailed information about their daily diabetes habits.

1145

1146 **8.6 Study Stopping Criteria**

1147

1148 **8.6.1 Subject Discontinuation of Study Treatment**

1149 Rules for discontinuing inControl Advice (if randomized to CGM+DSS group) or study CGM use (if
1150 randomized to the CGM group) are as follows:

- 1151 1. One episode of severe hypoglycemia, or of hyperglycemia/DKA as defined in Section 8.1
- 1152 2. One serious adverse event related to device malfunction.
- 1153 3. The subject requests that the treatment be stopped
- 1154 4. Subject pregnancy

1155

1156 **8.6.2 Criteria for Suspending/Stopping Overall Study**

1157 In the case of inControl Advice resulting in a severe hypoglycemia or severe hyperglycemia event (as
1158 defined in Section 8.1) that is thought to be advice-related (due to excess insulin administration) and
1159 occurs more than three times, the overall study will be suspended while the problem is diagnosed. The
1160 study may resume if the underlying problem can be corrected by a protocol or system modification that
1161 will not invalidate the results obtained prior to suspension. The overall study will be stopped in the
1162 event of three serious adverse events related to device malfunction.

1165 **9 MISCELLANEOUS CONSIDERATIONS**

1166 **9.1 Benefits**

1168 One purpose of this research is to reduce the frequency of hypoglycemia and severe hypoglycemic
1169 events. Hypoglycemia is the number one fear of many individuals and families with someone who has
1170 type 1 diabetes and this fear often prevents optimal glycemic control.

1171 It is expected that this protocol will yield increased knowledge about using a decision support system
1172 to help control the glucose level. In addition, it is the belief of the investigators that this study also presents
1173 prospect of direct benefit to the subjects and general benefit to others with diabetes.

1175 **9.2 Subject Compensation**

1177 Pilot subjects completing the 48-hour transitional setting admission will be compensated \$200.

1179 Subjects will be compensated \$50 for each clinic visit during the study.

1181 **9.3 Subject Withdrawal**

1182 Participation in the study is voluntary, and a subject may withdraw at any time. For subjects who
1183 withdraw, their data will be used up until the time of withdrawal.

1185 **9.4 Confidentiality**

1186 For security and confidentiality purposes, subjects will be assigned an identifier that will be used
1187 instead of their name. Protected health information gathered for this study will be shared with the third
1188 party collaborators. De-identified subject information may also be provided to research sites involved
1189 in the study.

1191 **9.5 Drug Accountability and Storage**

1192 Insulin will be provided by a third party collaborator and delivered to the Investigational Pharmacy.
1193 The clinical investigator will be responsible for maintaining adequate records of the disposition of the
1194 drug. The clinical investigator will also ensure proper security and storage of the investigational drug.

1196 Documentation: The site will document drug receipt, subject dispensing and return, returns of used and
1197 unused supplies to a third party collaborator (or on-site destruction), and will maintain a current
1198 accounting of all supplies in inventory—that is, a balance-on-hand log. The balance-on-hand, or
1199 dispensing, log will contain the protocol number, the investigative site(s), the drug name, and the
1200 medication units—such as cartridge). The site will document receipt of each drug shipment in the
1201 balance-on-hand log, noting the date, amount, and lot, batch, or ID numbers. When dispensing drug to
1202 a subject, site personnel will record the date, subject number, and amount dispensed. When a subject
1203 returns a drug, the amount used and unused will be documented, and an explanation for any
1204 inadvertent loss or destruction of supplies will also be recorded.

1205 Ensuring compliance and reconciliation: Site personnel will assess dosing regimen compliance and
1206 drug reconciliation in an ongoing manner. At each subject visit, subject compliance will be evaluated
1207 and documented, including calculating the expected amount of consumed drug given the regimen and
1208 amount of time between visits. This figure will be compared with the amount dispensed minus the
1209 amount the subject returned. Site personnel will question the subject regarding any discrepancies in
1210 these amounts and document the explanation.

1213 Insulin Storage: Insulin will be stored per product labeling as follows:

Insulin	Temperature	Use up to
In use (opened)	Room temperature: up to 86°F	28 days
Not in use (unopened)	Room temperature: up to 86°F	28 days
Not in use (unopened)	Refrigerated: 36°F to 46°F	Expiration date

1214

1215

1216

1217

1218 **10 STATISTICAL CONSIDERATIONS**

1219 The approaches to sample size and statistical analyses are summarized below. A detailed statistical
1220 analysis plan will be written and finalized prior to the completion of the study.

1224 **10.1 Sample Size**

1225 We plan on 132 subjects finishing the study, leading to a potential enrollment of 160, with up to 17.5%
1226 attrition. We base our analysis on our previous decision-support trial [7] which recruited N=120
1227 subjects and concluded with N=96 yielding effect size of 0.2 on key parameters, and on the feasibility
1228 and safety study described in the background. In this study, 11 T1DM pump users tested a prototype of
1229 the DSS leading to an estimated moderate effect size of 0.5 (Cohen D method). Assuming a substantial
1230 reduction of effect size due to (i) the focus on MDI patients, (ii) the presence of CGM in both the
1231 experimental and the control groups, and (iii) the translation of the effect to an uncontrolled
1232 environment similar to the environment of our previous trial [7], we assume a small to medium effect
1233 size. Using the statistical analysis presented below, a 0.15 effect size, with 2 groups randomized in a
1234 ratio of 2:1 (experimental-control), and 3 repeated measures (inter measure correlation of 0.5) leads to
1235 a required sample size of N=132 (expected power of 95.6%) [15].

1236 **10.2 Primary Endpoints Analyses**

1237 The primary analysis will follow the intention-to-treat principle [16]. It will include all subjects and the
1238 data will be analyzed in the group to which the subjects were assigned through randomization. Percent
1239 in range (70-180 during the day and 80-140 at night) will be computed over each month of data and
1240 entered in a Repeated Measure ANOVA, where the within-between interaction (group x period) will
1241 be studied.

1243 **10.3 Secondary Efficacy Analyses**

1244 In addition to the primary endpoint we will study:

- 1245 • HbA1c: estimated effect size of 0.15; repeated measures ANOVA, 2 groups, 2 measures,
1246 results in power of 90% with current enrollment;
- 1247 • Exposure to hypoglycemia, as measured by the percent of time spent below 70mg/dL and by
1248 the Low BG Index [13]; estimated effect size 0.25; power for repeated measures ANOVA 2x3
1249 >99%;
- 1250 • Exposure to hyperglycemia, as measured by the percent of time spent above 300mg/dL;
1251 estimated effect size 0.2; power for repeated measure ANOVA 2x3 = 99%;
- 1252 • Glucose variability as measured by the Average Daily Risk Range [14] (over 2-week period);
1253 estimated effect size 0.15; power for repeated measure ANOVA 2x6 = 95%.

1255 **10.4 Questionnaires**

1256 The following questionnaires will be completed at the randomization visit:

- 1257 • Diabetes Specific Personality Questionnaire
- 1258 • Clarke Hypoglycemia Awareness Scale [17]
- 1259 • Fear of Hypoglycemia Survey (HFS-II) [18]
- 1260 • Low Blood Sugar Survey
- 1261 • High Blood Sugar Survey
- 1262 • Diabetes Distress Scale
- 1263 • Technology Expectations Survey (CGM+DSS group)

1265
1266 The following questionnaires will be completed at the final visit at week 12:

1267 • Clarke's Hypoglycemia Awareness Scale
1268 • Fear of Hypoglycemia Survey (HFS-II)
1269 • Low Blood Sugar Survey
1270 • High Blood Sugar Survey
1271 • Diabetes Distress Scale
1272 • Technology Acceptance Survey (CGM+DSS group)

1273
1274 For each questionnaire, mean \pm SD values or percentiles appropriate to the distribution will be given
1275 by randomization group for the total score and each subscale. For questionnaires administered to both
1276 randomization groups comparisons will be made using similar ANCOVA models as described above
1277 for the primary endpoints. No formal adjustment will be made for multiple comparisons.

1278
1279 **10.5 Primary Safety Analyses**
1280 All subjects will be included in these analyses.

1281
1282 The circumstances of all reportable cases of the following will be summarized and tabulated by
1283 treatment group:

1284 • Severe hypoglycemia (as defined in Section 8.1)
1285 • Diabetic ketoacidosis (as defined in Section 8.1)
1286 • Other serious adverse events (SAE) and serious adverse device events (SADE)
1287 • Unanticipated adverse device effects (UADE)

1288
1289 The total number of SH or DKA events per subject will be compared using robust Poisson regression
1290 and the percentage of subjects with at least one event will be compared using Fisher's exact test.

1291
1292 **10.6 Additional Tabulations**
1293 The following tabulations will be performed without statistical testing:

1294 - baseline demographics and clinical characteristics
1295 - flow chart accounting for all subjects for all visits
1296 - visit completion rates for each follow-up visit
1297 - hours of sensor use
1298 - days of sensor use per week
1299 - phone contact completion rates for each follow-up visit
1300 - protocol deviations
1301 - number and reasons for unscheduled visits and phone calls
1302 - device malfunctions requiring study team contact and other reported device issues
1303 - In addition, performance metrics will be tabulated, describing the inControl Advice system and
1304 its components.

1305
1306 **10.7 Interim Analysis**
1307 All CGM-related study endpoints will be analyzed for the first 6 weeks of study intervention in the
1308 first 40 subjects. The purpose of the interim analysis is to support regulatory submissions for the
1309 CGM+DSS system.

1310

1311 **11 DATA COLLECTION AND MONITORING**

1312 **11.1 Case Report Forms and Device Data**

1313 The main study data are collected through a combination of case report forms (CRFs) and electronic
1314 device data files obtained from the study software and individual hardware components. These
1315 electronic device files and electronic CRFs from the study website are considered the primary source
1316 documentation.

1317 **11.2 Document Storage and Retention**

1318 The Investigator of each clinical site will retain all records and documents pertaining to this study.
1319 They will be available for inspection by the appropriate regulatory agencies. In addition, the
1320 Investigator will retain the source documents from which the information entered on the CRFs was
1321 derived. These records are to be retained in a secure storage facility maintained by the investigational
1322 center until 3 years (or longer/shorter if local laws require) after approval of the above-listed study
1323 devices or termination of the study, whichever is longer. The investigator should take measures to
1324 prevent accidental or early destruction of the clinical study related materials.

1328 **12 Publication Policy**

1329 The contents of this protocol, the manuals pertaining to this study and the results of the investigation
1330 are confidential and may not be published or disclosed without the written consent of University of
1331 Virginia. The identity of the subjects may not be disclosed, unless required by law, to any persons not
1332 immediately involved in the study or the study procedures. The results of the clinical study will be
1333 submitted for publication in a peer-reviewed scientific journal upon study completion.

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