

Lessons Learned from Trial Replication Analyses: Findings from the DUPLICATE Demonstration Project

May 10, 2022



Welcome and Introductions

Rachele Hendricks-Sturup

Research Director, Real World Evidence

Duke-Margolis Center for Health Policy

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Virtual Meeting Reminders

- Attendees are encouraged to contribute throughout the meeting with questions in the Zoom Q&A function.
- This meeting is being recorded, and the recording and slide deck will be posted on the Duke-Margolis event page in the weeks following the meeting.

Meeting Agenda

12:00 pm - Welcome and Introductions

12:05 pm - Opening Remarks from FDA

12:15 pm - Overview of Technical Findings: The RCT-DUPLICATE Demonstration Project

1:15 pm - Break

1:20 pm - Stakeholder Reactions to Result Findings, and Implications

2:25 pm - Closing Remarks

2:30 pm - Adjournment

FDA Opening Remarks

John Concato

U.S. Food and Drug Administration

Duke-Margolis Public Webinar

Lessons Learned from RCT-DUPLICATE

10 May 2022

John Concato, MD, MS, MPH

Associate Director for Real-World Evidence Analytics

Office of Medical Policy

Center for Drug Evaluation and Research

U.S. Food and Drug Administration

- **Views and opinions expressed are those of the presenter and should not be attributed to the Food and Drug Administration**
- **No conflicts of interest exist related to this presentation**

21st Century Cures Act (2016) – RWE



- **FDA established a program to evaluate the potential use of real-world evidence (RWE) to:**
 - **Support a new indication for a drug approved under section 505(c)**
 - **Satisfy post-approval study requirements**
- **Draft framework issued in December 2018:**
 - **Describe sources of RWE, challenges, pilot opportunities, etc.**
- **Draft guidance for industry issued in Sep, Oct, Nov, & Dec 2021**
- **Standard for substantial evidence remains unchanged; commitments met for Prescription Drug User Fee Act (PDUFA) VI**

Background: 'Real-World' Definitions (FDA 2018)

Real World Data (RWD) are data relating to patient health status and/or delivery of health care **routinely collected from a variety of sources**

electronic health records (EHRs)

medical claims data

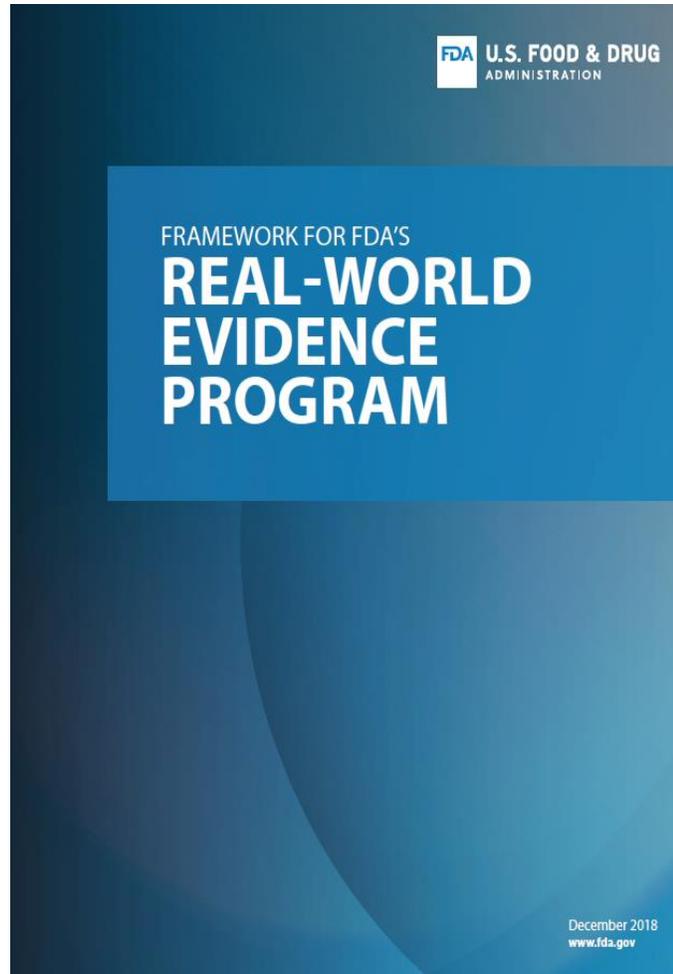
product and disease registries

patient-generated data, including from in-home settings

other sources that can inform on health status, such as "wearable" devices

Real World Evidence (RWE) is clinical evidence regarding the usage and potential benefits/risks of a medical product derived from analysis of RWD

Generated using different study designs, including but not limited to **randomized trials (e.g., pragmatic clinical trials), externally controlled trials, or observational studies**



- **Applies to Center for Drug Evaluation and Research (CDER) and Center for Biologics Evaluation and Research (CBER)**
- **Multifaceted program to implement RWE:**
 - internal processes
 - external stakeholder engagement
 - guidance development
 - demonstration projects

<https://www.fda.gov/media/120060/download>

Guidance for Industry

DRAFT GUIDANCE

Real-World Data: Assessing Electronic Health Records and Medical Claims Data To Support Regulatory Decision-Making for Drug and Biological Products

Data Standards for Drug and Biological Product Submissions Containing Real-World Data

Real-World Data: Assessing Registries to Support Regulatory Decision-Making for Drug and Biological Products

Considerations for the Use of Real-World Data and Real-World Evidence to Support Regulatory Decision-Making for Drug and Biological Products

Ongoing RWE Demonstration Projects - Examples



- 'OneSource' project
- Linking RCTs w/ RWD
- 'ICAREdata' project



- RCT-DUPLICATE trial emulations
- Statistics for RCT designs w/ hybrid controls

- Evaluating confounded treatment effects
- Targeted learning framework for causal effect estimation

'The Magic of Randomization versus the Myth of Real-World Evidence'

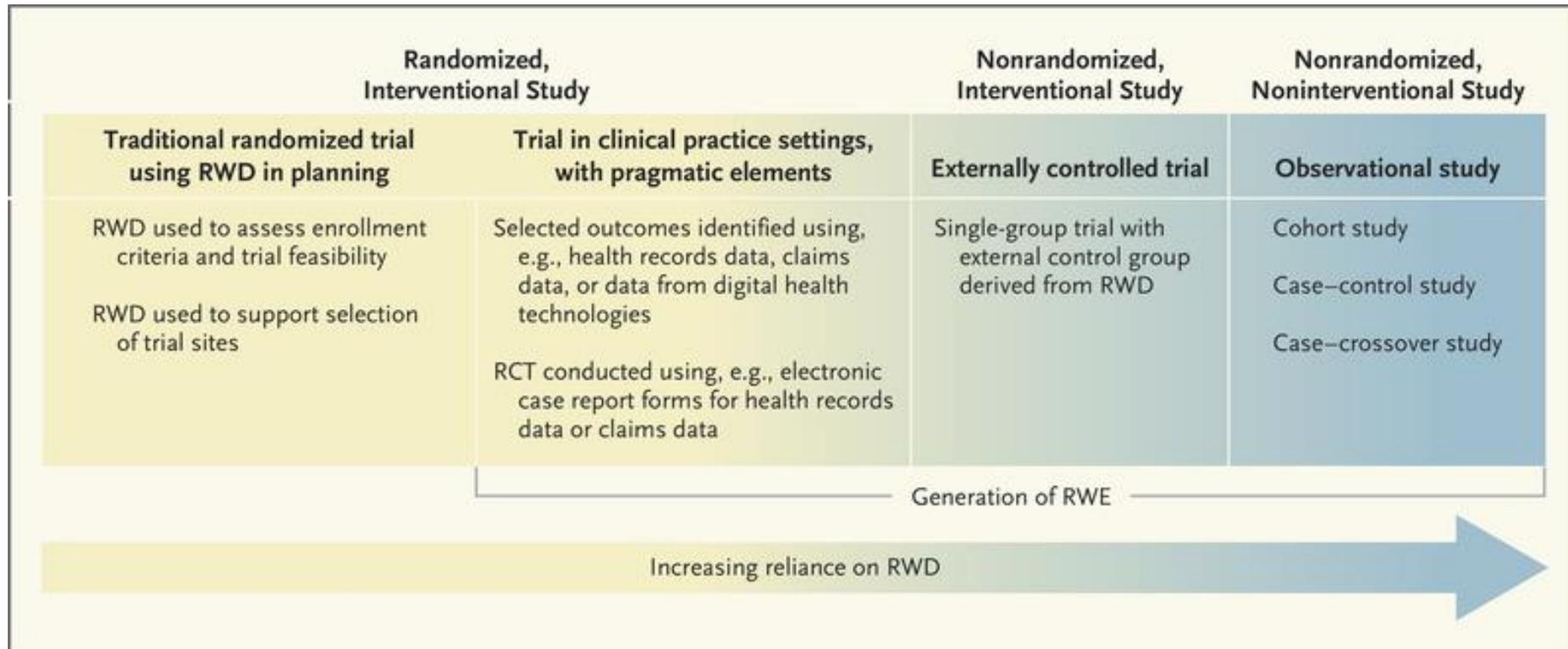
**"[...] because of the potential biases in observational studies, such studies cannot generally be trusted [...] the replacement of randomized trials with nonrandomized observational analyses is a false solution to the serious problem of ensuring that patients receive treatments that are both safe and effective."
(Collins, *New Engl J Med* 2020;382:674)**

'Misunderstanding randomized controlled trials'

"We argue that any special status for RCTs is unwarranted. Which method is likely to yield a good causal inference depends on what we are trying to discover as well as on what is already known." (Deaton & Cartwright, *Soc Sci Med*, 2018;210:2)

Real-World Evidence — Where Are We Now?

John Concato, M.D., M.P.H., and Jacqueline Corrigan-Curay, J.D., M.D.



Reliance on RWD in Representative Types of Study Design.

RCT denotes randomized, controlled trial; RWD real-world data; and RWE real-world evidence.

N ENGL J MED 386;18 NEJM.ORG MAY 5, 2022

RCT-DUPLICATE as an evaluation of observational studies:

- **Project title: *Randomized Controlled Trials Duplicated Using Prospective Longitudinal Insurance Claims: Applying Techniques of Epidemiology***
- **Note: seeking to emulate a hypothetical randomized trial when designing a non-interventional study is a fundamentally different task**
- **Excerpt from project website: “If principled nonrandomized study approaches based on healthcare databases can consistently match the results of published trials and predict the results of ongoing trials, then we gain confidence in the validity of future real-world data analyses that may be performed in the absence of randomized trial evidence”**

RCT-DUPLICATE – Selected Process Steps

- **Prospective engagement with FDA during protocol development and initial feasibility and power calculations**
- **FDA review of final definitions of cohort identification, exposure, outcome, and covariates**
- **While still blind to differential outcome, final power analyses and covariate balance checks are completed; joint go/no-go decision**
- **Study protocol registered on ClinicalTrials.gov**
- **Analyze outcome data and calculate effect measures**
- **Document findings**
- **Apply prespecified measures of agreement**
- **Audit trail visible to FDA throughout the process; FDA sub-team can engage in additional post-hoc sensitivity analyses for training purposes**



CDERMedicalPolicy-RealWorldEvidence@fda.hhs.gov

Overview of Technical Findings: The RCT-DUPLICATE Demonstration Project

12:15-1:15pm



Emulating randomized clinical trials with non-randomized real-world evidence studies

Results from the RCT DUPLICATE¹ initiative

Sebastian Schneeweiss, MD, ScD

Professor of Medicine and Epidemiology

Shirley V Wang, PhD

Associate Professor of Medicine

Jessica Franklin, PhD

Associate Professor of Medicine**

Division of Pharmacoepidemiology and Pharmacoeconomics, Department of Medicine
Brigham and Women's Hospital, Harvard Medical School, Boston

¹ Randomized Controlled Trials Duplicated Using Prospective Longitudinal Insurance Claims: Applying Techniques of Epidemiology

** Formerly with the Brigham and Women's Hospital, now at Optum Inc.



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Disclosures

Dr. Schneeweiss

- PI, Sentinel Innovation Center (FDA)
- Co-Chair, Mass General Brigham Center for Integrated Healthcare Data Research
- PI of grants and contracts from NIH, AHRQ, PCORI, FDA, IMI, Arnold Foundation
- Investigator of research grants awarded to BWH by Boehringer Ingelheim, UCB
- Consulting fees from Aetion, Inc. (incl. equity)

Dr. Wang

- Supported by grants from FDA Sentinel, NHLBI, NIA, NICHD

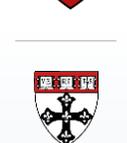
Dr. Franklin

- Current employment by Optum, Inc.



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- Preview of emulation challenges (8-10)
- Summary of trial emulation results (11-14)
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Key publications on our rationale and methodology

When and How Can Real World Data Analyses Substitute for Randomized Controlled Trials?

Jessica M. Franklin¹ and Sebastian Schneeweiss¹

Emulation Differences vs. Biases When Calibrating Real-World Evidence Findings Against Randomized Controlled Trials

Jessica M. Franklin^{1*}, Robert J. Glynn¹, Samy Suissa² and Sebastian Schneeweiss¹

Nonrandomized Real-World Evidence to Support Regulatory Decision Making: Process for a Randomized Trial Replication Project

Jessica M. Franklin^{1*} , Ajinkya Pawar¹ , David Martin², Robert J. Glynn¹, Mark Levenson³, Robert Temple⁴ and Sebastian Schneeweiss¹ 

Circulation

ORIGINAL RESEARCH ARTICLE

Emulating Randomized Clinical Trials With Nonrandomized Real-World Evidence Studies

First Results From the RCT DUPLICATE Initiative

Jessica M. Franklin , PhD
Elisabetta Patorno , MD,
DrPH

Rishi J. Desai , MS, PhD
Robert J. Glynn, PhD, ScD
David Martin, MD, MPH
Kenneth Quinto, MD,
MPH

Ajinkya Pawar , PhD
Lily G. Bessette, BS
Hemin Lee, MD, MPH
Elizabeth M. Garry , PhD
Nileesa Gautam, BS
Sebastian Schneeweiss,
MD, ScD



Executive Summary



Knowledge gap: When can RWE come to causal conclusions on treatment effects?

Objective: To emulate 30 RCTs using clinical practice data and compare findings

Approach: Using claims data, we applied a pre-defined, transparent process to emulate RCTs with RWE and compare treatment effect estimates

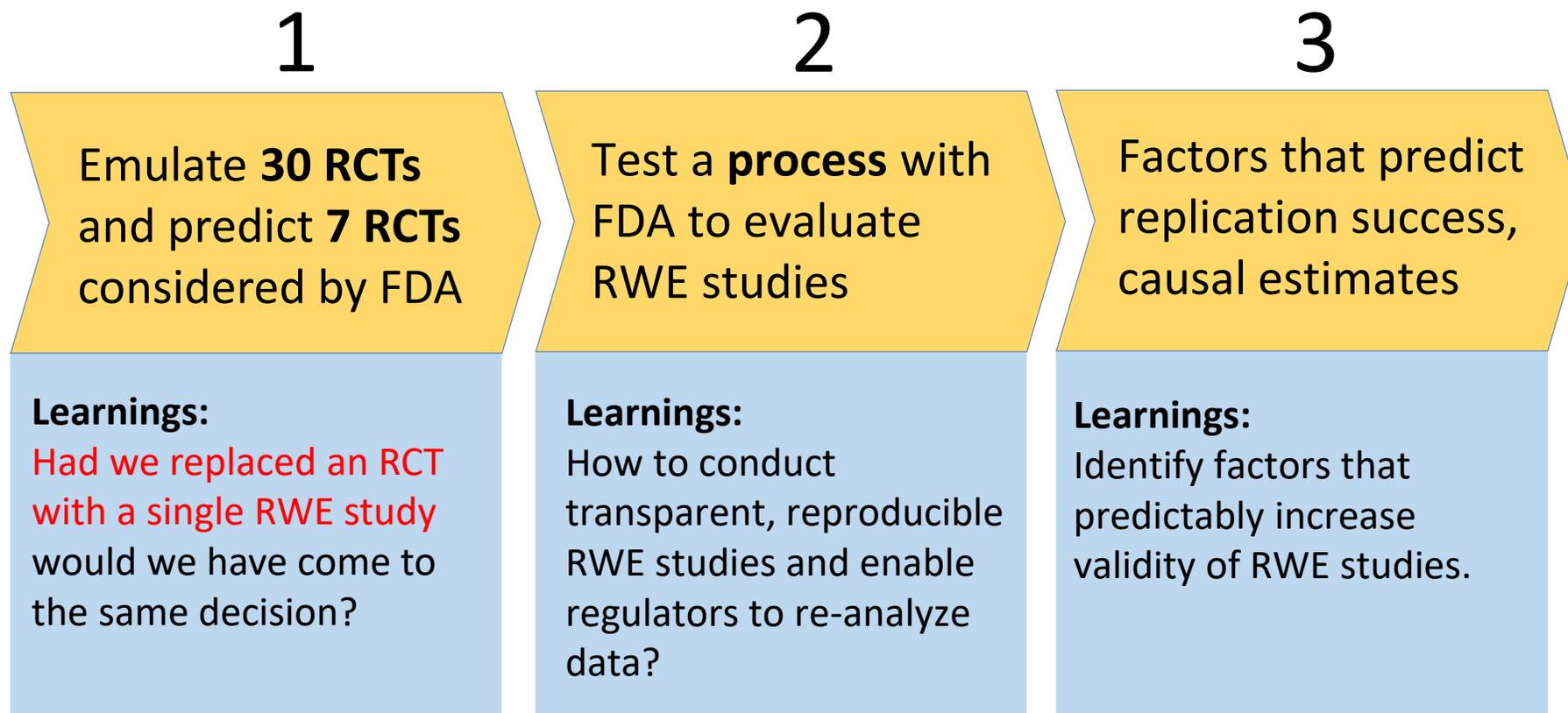
Findings:

- 50% of the selected RCTs could be emulated closely regarding design, analysis
- Closely emulated RCTs found comparable treatment effects to the RWE studies
- RCT and RWE findings were more likely to diverge when there were substantive emulation challenges; perhaps answering different target questions or due to bias

Implications: Rigorous epidemiologic methods combined with fit-for-purpose data and target trial approaches can produce valid inference from RWE studies

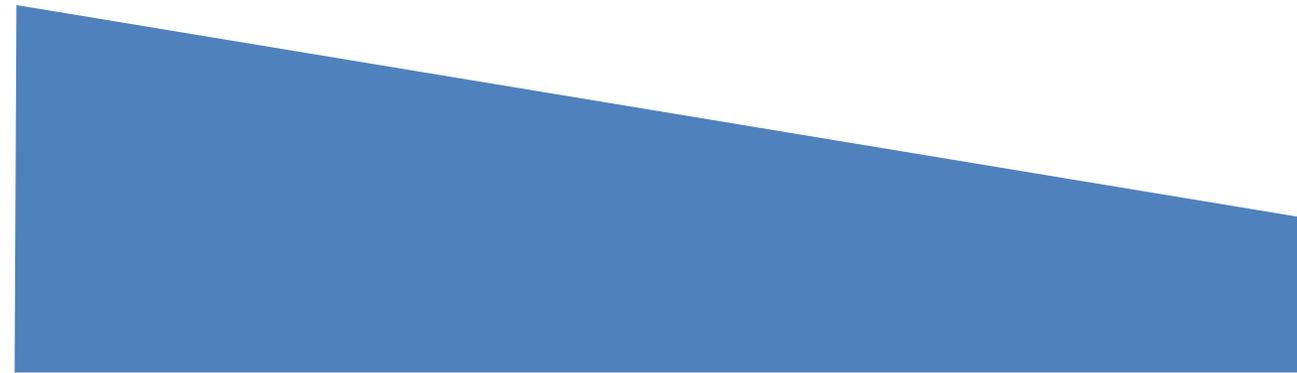
RCT-DUPLICATE: A methods demonstration project

Objective: To understand and improve the validity of RWE studies to support regulatory decision making





When and How Can Real-World Data Analyses Align With Randomized Controlled Trials?



Pragmatic design



Ability to emulate RCT with RWE study

Explanatory design



Ability to emulate RCT with RWE study

Emulation differences vs Bias: *Are we asking a different question?*

Emulation Differences

Differences between RCT and RWE

Population

- Inclusion-exclusion
- Run-in periods with subject selection

Treatment strategy

- Loading dose, step-up therapy, allowable co-medication
- Placebo

Outcome ascertainment

- Measurement definition
- Primary vs. secondary data collection

Follow up

- Time-varying hazard
- Measures to maximize adherence

Bias

Differences between RWE treatment arms

Confounding

- Un- or mis-measured outcome predictors

Outcome ascertainment

- Differential surveillance
- Misclassification

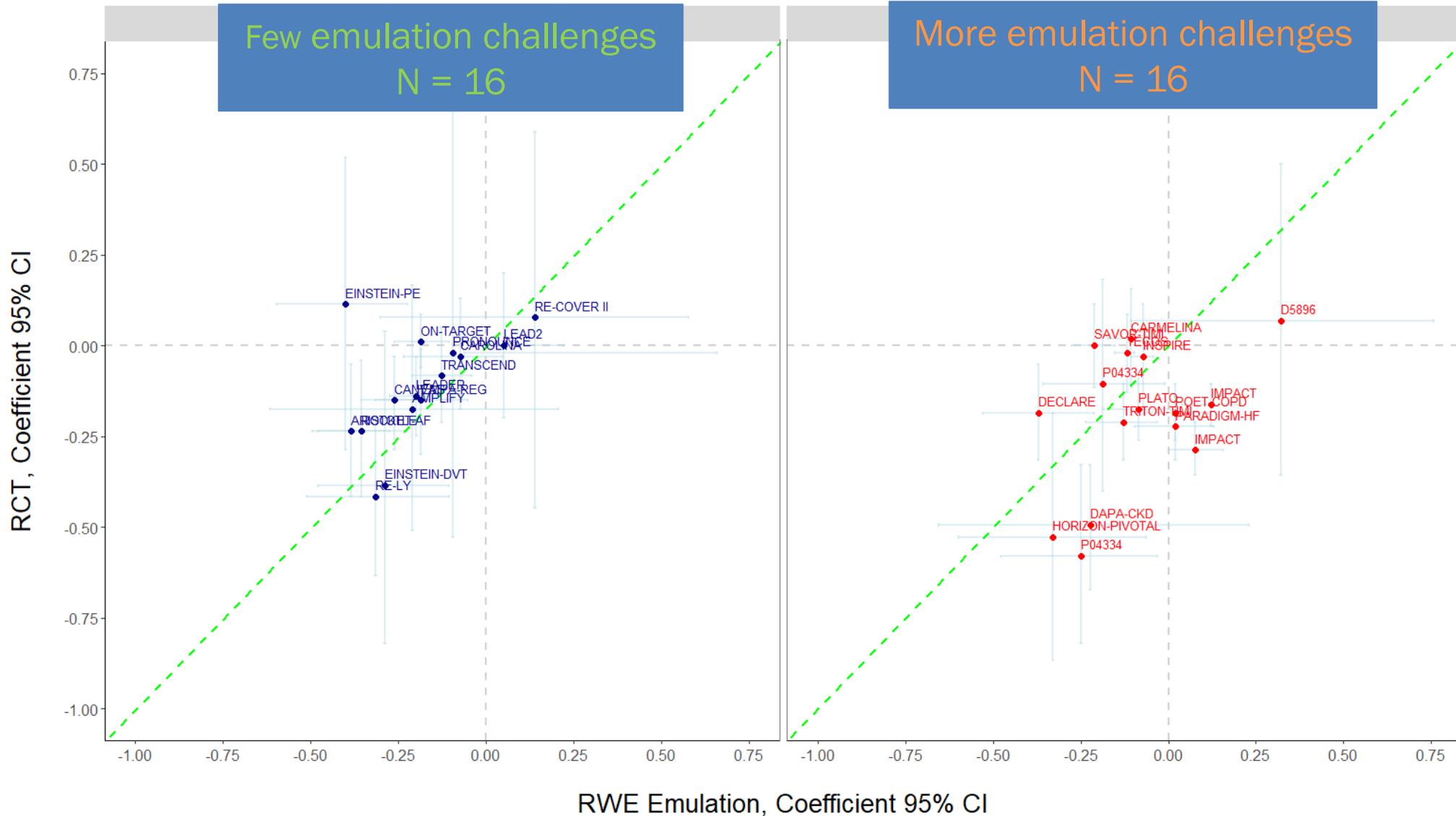
Follow up

- Differential duration
- Informative censoring

Emulation Differences vs. Biases When Calibrating Real-World Evidence Findings Against Randomized Controlled Trials



Few emulation challenges vs more emulation challenges



Trials 1 - 11*



	Trial name	RCT	RWE ¹		Std. Diff.	Agreement	Close emulation?
			Adjusted	Unadjusted			
Diabetes	LEADER	0.87 (0.78, 0.97)	0.82 (0.76, 0.87)	0.57 (0.54, 0.61)	0.90	RA/EA/SD	Y
	DECLARE	0.83 (0.73, 0.95)	0.69 (0.59, 0.81)	0.47 (0.41, 0.53)	1.76	RA/-/SD	N
	EMPA-REG	0.86 (0.74, 0.99)	0.83 (0.73, 0.95)	0.63 (0.57, 0.70)	0.35	RA/EA/SD	Y
	CANVAS	0.86 (0.75, 0.97)	0.77 (0.70, 0.85)	0.58 (0.54, 0.62)	1.34	RA/EA/SD	Y
	CARMELINA	1.02 (0.89, 1.17)	0.90 (0.84, 0.96)	0.90 (0.86, 0.95)	1.61	-/EA/SD	N
	TECOS	0.98 (0.88, 1.09)	0.89 (0.86, 0.91)	0.81 (0.79, 0.84)	1.71	-/EA/SD	N
	SAVOR-TIMI	1.00 (0.89, 1.12)	0.81 (0.76, 0.86)	0.65 (0.62, 0.69)	3.16	-/-/-	N
	LEAD2	0.00 (-0.20, 0.20)	0.05 (0.11, 0.22)	0.01 (0.11, 0.13)	-0.37	RA/EA/SD	Y
Antiplatelet	TRITON-TIMI	0.81 (0.73, 0.90)	0.88 (0.79, 0.97)	0.70 (0.65, 0.76)	-1.11	RA/EA/SD	N
	PLATO	0.84 (0.77, 0.92)	0.92 (0.83, 1.02)	0.84 (0.78, 0.91)	-1.31	-/EA/SD	N
	ISAR-REACT5	1.36 (1.09, 1.70)	n/a ²	n/a ²	n/a ²	n/a ²	N

1) Pooled estimate across databases

2) Chi-square test indicated that results were heterogeneous by database, therefore results were not pooled

* Close emulation refers to trials where there were few emulation challenges

RA = regulatory agreement (point est and CI on same side of null); EA = estimate agreement (RWE estimate in CI of RCT); SD = std diff agreement (≤ 2)



Trials 12 - 22*



	Trial name	RCT	RWE ¹		Std. Diff.	Agreement	Close emulation?
			Adjusted	Unadjusted			
Atrial Fibrillation	ARISTOTLE	0.79 (0.66, 0.95)	0.68 (0.61, 0.76)	0.66 (0.62, 0.71)	1.36	RA/EA/SD	Y
	RE-LY	0.66 (0.53, 0.82)	0.73 (0.60, 0.90)	0.67 (0.58, 0.78)	-0.66	RA/EA/SD	Y
	ROCKET-AF	0.79 (0.66, 0.96)	0.70 (0.62, 0.80)	0.76 (0.69, 0.84)	1.00	RA/EA/SD	Y
VTE	EINSTEIN-DVT	0.68 (0.44, 1.04)	0.75 (0.62, 0.90)	0.85 (0.76, 0.95)	-0.42	-/EA/SD	Y
	EINSTEIN-PE	1.12 (0.75, 1.68)	0.67 (0.55, 0.80)	0.73 (0.64, 0.83)	2.28	-/-/-	Y
	RE-COVER II	1.08 (0.64, 1.80)	1.15 (0.74, 1.78)	1.48 (1.09, 2.00)	-0.18	RA/EA/SD	Y
	AMPLIFY	0.84 (0.60, 1.18)	0.81 (0.54, 1.23)	0.64 (0.50, 0.82)	0.13	RA/EA/SD	Y
	RECORD1	0.25 (0.14, 0.47)	0.17 (0.10, 0.29)	0.25 (0.18, 0.34)	0.63	RA/EA/SD	Y
Hypertension	TRANSCEND	0.92 (0.81, 1.05)	0.88 (0.81, 0.96)	0.80 (0.74, 0.85)	0.55	-/EA/SD	Y
	ON-TARGET	1.01 (0.94, 1.09)	0.83 (0.77, 0.90)	0.68 (0.64, 0.72)	3.46	-/-/-	Y

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Trials 23 - 30*



Osteoporosis

Chronic Kidney

Heart Failure

Asthma

COPD

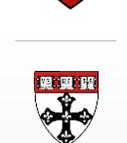
Trial name	RCT	RWE ¹		Std. Diff.	Agreement	Close emulation?
		Adjusted	Unadjusted			
HORIZON-PIVOTAL	0.59 (0.42, 0.83)	0.72 (0.55, 0.94)	1.08 (0.86, 1.35)	-0.90	RA/EA/SD	N
VERO	0.44 (0.29, 0.68)	n/a ²	n/a ²	n/a ²	n/a ²	N
DAPA-CKD	0.61 (0.51, 0.72)	0.80 (0.52, 1.26)	0.41 (0.29, 0.58)	-1.10	-/-/SD	N
PARADIGM-HF	0.80 (0.73, 0.87)	1.02 (0.91, 1.14)	0.95 (0.90, 1.02)	-3.42	-/-/-	N
P04334	0.56 (0.44, 0.72)	0.78 (0.62, 0.97)	0.87 (0.76, 0.99)	-1.95	RA/-/SD	N
D5896	1.07 (0.70, 1.65)	1.38 (0.90, 2.13)	1.41 (1.00, 1.98)	-0.81	RA/EA/SD	N
IMPACT	0.85 (0.80, 0.90)	1.13 (1.04, 1.23)	1.22 (1.15, 1.30)	-5.46	-/-/-	N
POET-COPD	0.83 (0.77, 0.90)	1.02 (0.93, 1.12)	1.05 (0.99, 1.12)	-3.27	-/-/-	N
INSPIRE	0.97 (0.84, 1.12)	0.93 (0.90, 0.96)	0.83 (0.81, 0.85)	0.56	RA/EA/SD	N

1) Pooled estimate across databases

2) Chi-square test indicated that results were heterogeneous by database, therefore results were not pooled

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RA = regulatory agreement (point est and CI on same side of null); EA = estimate agreement (RWE estimate in CI of RCT); SD = std diff agreement (≤ 2)



Prediction of ongoing Phase IV RCTs (2 of 7)

	Trial name	RCT	RWE ¹		Std. Diff.	Agreement	Close emulation?
			Adjusted	Unadjusted			
Diabetes	CAROLINA ²	0.98 (0.84, 1.14)	0.91 (0.79, 1.05)	0.92 (0.83-1.01)	0.70	RA/EA/SD	Y
Prostate cancer	PRONOUNCE ³	1.28 (0.59, 2.79)	1.35 (0.94, 1.93)	1.70 (1.30, 2.21)	-0.12	RA/EA/SD	Y

- 1) Pooled estimate across databases
- 2) Patorno E, Schneeweiss S, Gopalakrishnan C, Martin D, Franklin JM. Using real-world data to predict findings of an ongoing phase IV cardiovascular outcome trial: cardiovascular safety of linagliptin versus glimepiride. *Diabetes Care*. 2019;42:2204-10
- 3) Merola D, Schneeweiss S, Sreedhara S, Zobotka LE, Quinto K, Concato J, Wang SV. Using real-world data to predict results of an ongoing phase IV oncology trial: comparative safety of degarelix vs. leuprolide in advanced prostate cancer. *Manuscript in preparation*.

* Close emulation refers to trials where there were few emulation challenges
 RA = regulatory agreement (point est and CI on same side of null); EA = estimate agreement (RWE estimate in CI of RCT); SD = std diff agreement (≤ 2)

Outline

Emulation
Challenges

Example



Lessons
Learned



Emulation Challenges



- Inclusion-exclusion emulation
- Population distribution
- Comparator emulation (good, moderate, poor)
- Outcome emulation (good, moderate)
- Placebo control
- In-hospital start of medication
- Dose titration protocol during follow-up
- Delayed effect with a long follow-up window
- Run-in window
- Discontinuation of maintenance therapy at randomization
- Robustness



Emulation Challenges

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- Well emulated
- Sufficiently emulated
- Difficult to emulate

PARADIGM-HF (Phase 3)

Inclusion

Age \geq 18, HFrEF, HF hospitalization within 12 months
Stable on ACEis/ARBs and beta-blocker therapies

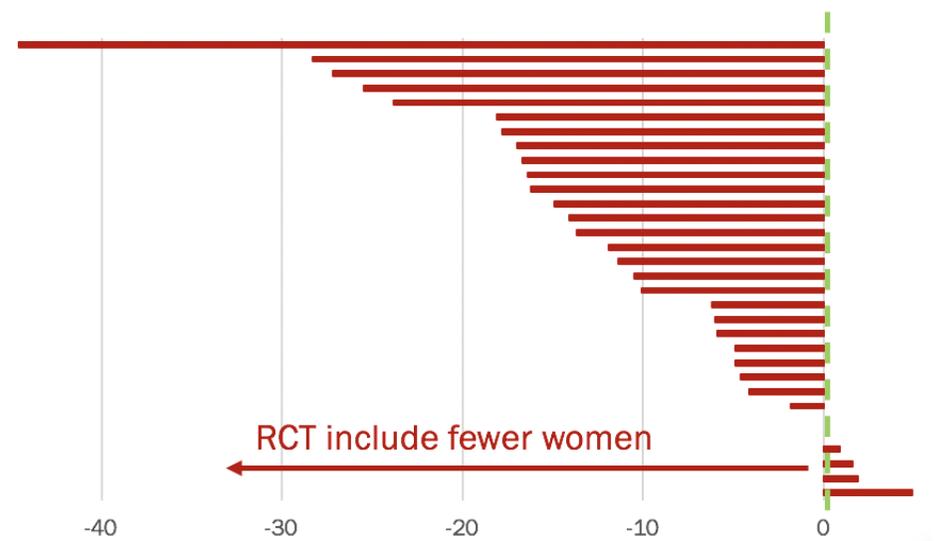
Exclusion

- Allergy, intolerance, and contraindication to any of the study drugs
- History of angioedema
- Treatment with both ACEis AND ARBs
- Acute decompensated HF
- Symptomatic hypotension
- Low eGFR/renal dysfunction
- Hyperkalemia
- ACS, Stroke, TIA, CABG, PCI, Other CV Procedures, Carotid Angioplasty within 3 months
- Coronary/carotid artery disease or PCI within 6 mo. after visit 1
- CRT device within 3 months prior to visit 1 or intent to implant
- History of heart transplant, on transplant list, or with LVAD
- History of severe pulmonary disease
- Peripartum- or chemotherapy- induced cardiomyopathy
- Untreated ventricular arrhythmia with syncopal episodes
- Symptomatic bradycardia or 2nd & 3rd degree AV block
- Hemodynamically significant mitral and/or aortic valve disease
- Active IBD, Duodenal/gastric ulcers
- Hepatic disease
- Cholestyramine or colestipol resins
- Presence of any disease with a life expectancy of $<$ 5 years
- Ivabradine use

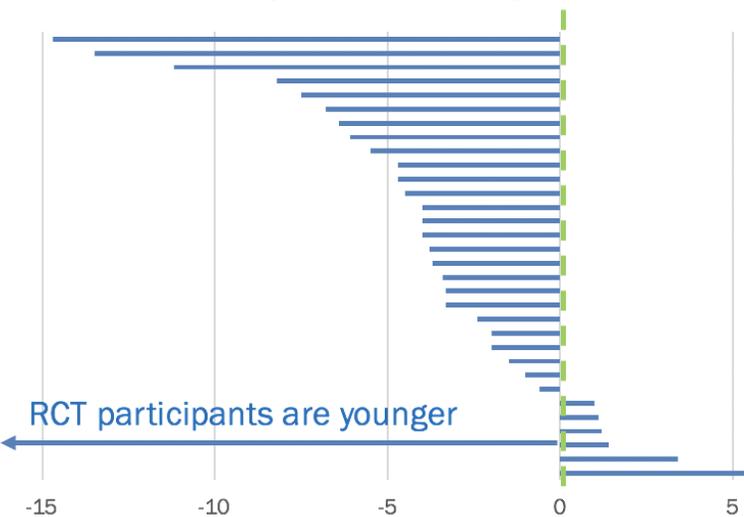
Emulation Challenges

- Inclusion-exclusion emulation
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% Female RCT - % Female RWE



Mean age RCT - Mean age RWE



Emulation Challenges



- Inclusion-exclusion emulation
- Population distribution
- **Comparator emulation (good, moderate, poor)**
- Outcome emulation (good, moderate)
- **Placebo control**
- In-hospital start of medication
- Dose titration protocol during follow-up
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- Discontinuation of maintenance therapy at randomization
- Robustness

Good

Trial had active comparator

Moderate

Placebo emulated by drug expected to be unrelated to the outcome AND cohort characteristics well balanced, OR active comparator had to be modified for feasibility reasons

Poor

Placebo emulated by drug expected to be unrelated to the outcome AND expectation of residual confounding from characteristics poorly measured in claims (e.g. SES)

Placebo control emulation

(2nd line diabetes drug – DPP4i vs sulfonylureas, 3P MACE)

Trial name	Comparator emulation	Endpoint emulation ⁺	RCT result	RWE results	Stand. Diff.	Test	Agreement		
CARMELINA	Linagliptin vs placebo	3P MACE	1.02 (0.89, 1.17)	0.90 (0.84, 0.96)	1.61	NI	*	EA	SD
TECOS	Sitagliptin vs placebo	3P MACE + angina	0.98 (0.88, 1.09)	0.89 (0.86, 0.91)	1.71	NI	*	EA	SD
SAVOR-TIMI	Saxagliptin vs placebo	3P MACE	1.00 (0.89, 1.12)	0.81 (0.76, 0.86)	3.16 [¶]	NI	*	–	–
CAROLINA	Linagliptin vs glimepiride	3P MACE	0.98 (0.84, 1.14)	0.91 (0.79, 1.05)	0.70	NI	RA	EA	SD

Good

Moderate

Poor

Comparator emulation

- Expensive new drug vs older cheap drug
- Difficult to capture SES differences?

Placebo control emulation

(2nd line diabetes drug – GLP1, SGLT2i vs DPP4i, 3P MACE)

Trial name	Comparator emulation	Endpoint emulation ⁺	RCT result	RWE results	Stand. Diff.	Test	Agreement		
1 LEADER	Liraglutide vs placebo	3P MACE	0.87 (0.78, 0.97)	0.82 (0.76, 0.87)	0.90	NI	RA	EA	SD
2 DECLARE	Dapagliflozin vs placebo	HHF + CV death	0.83 (0.73, 0.95)	0.69 (0.59, 0.81)	1.76	NI	RA	–	SD
3 EMPA-REG	Empagliflozin vs placebo	3P MACE	0.86 (0.74, 0.99)	0.83 (0.73, 0.95)	0.35	NI	RA	EA	SD
4 CANVAS	Canagliflozin vs placebo	3P MACE	0.86 (0.75, 0.97)	0.77 (0.70, 0.85)	1.34	NI	RA	EA	SD

Good

Moderate

Poor

Comparator emulation

- Comparing expensive newer drugs
- Closer therapeutic alternatives



Emulation Challenges



- Inclusion-exclusion emulation
- Population distribution
- Comparator emulation (good, moderate, poor)
- Outcome emulation (good, moderate)
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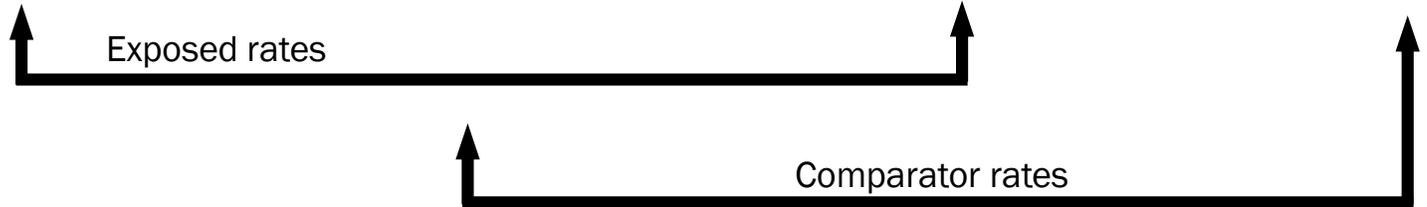
 Assessed with high specificity
 Lower specificity or high missingness



Outcome emulation



	RCT						RWE					
	Exposed			Comparator			Exposed			Comparator		
	Events	N	Rate*	Events	N	Rate*	Events	N	Rate*	Events	N	Rate*
ROCKET-AF	188	6,958	1.7	241	7,004	2.2	419	51,318	1.5	518	51,318	2.4
PARADIGM-HF	914	4,187	21.8	1,117	4,212	26.5	645	3,033	46.4	636	3,033	44.6
LEAD2	n/a	482	1.0	n/a	242	1.0	n/a	373	1.0	n/a	373	0.9



Assessed with high specificity
 Lower specificity or high missingness



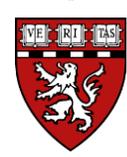
Emulation Challenges



- Inclusion-exclusion emulation
- Population distribution
- Comparator emulation (good, moderate, poor)
- Outcome emulation (good, moderate)
- Placebo control
- **In-hospital start of medication**
- Dose titration protocol during follow-up
- Delayed effect with a long follow-up window
- Run-in window
- Discontinuation of maintenance therapy at randomization
- Robustness



In-hospital start of medication



Trial name	Comparator	Endpoint	RCT result	RWE results	Stand. Diff.	Test	Agreement		
TRITON-TIMI	Prasugrel vs clopidogrel	3P MACE	0.81 (0.73, 0.90)	0.88 (0.79, 0.97)	-1.11	Sup	RA	EA	SD
PLATO	Ticagrelor vs clopidogrel	3P MACE	0.84 (0.77, 0.92)	0.92 (0.83, 1.02)	-1.31	Sup	-	EA	SD
ISAR-REACT5	Ticagrelor vs prasugrel	3P MACE	1.36 (1.09, 1.70)	--	--	Sup	--	--	--

MarketScan 1.20 (0.95, 1.51)
 Optum 0.73 (0.52, 1.01)
 P for homogeneity 0.01

Good

Moderate

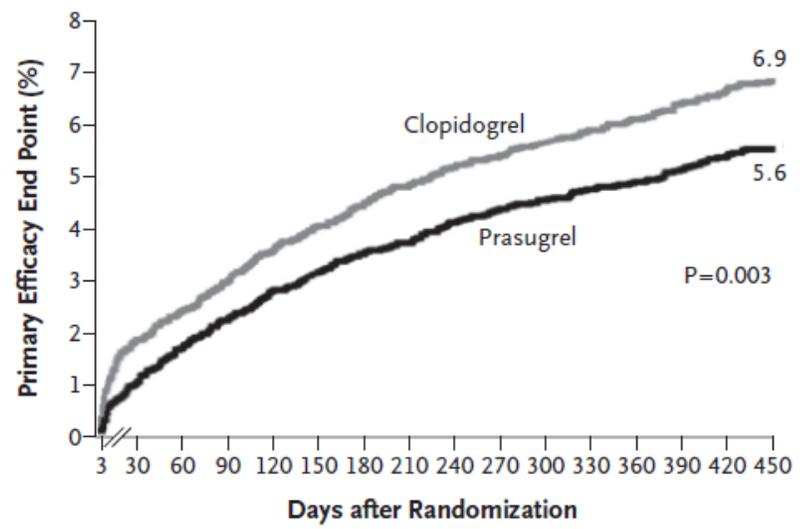
Poor



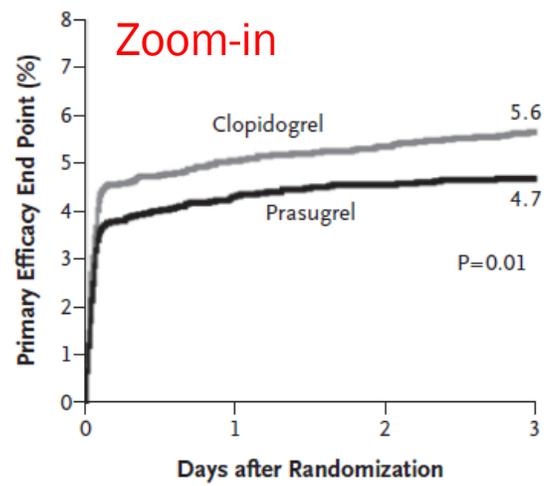
In-hospital start of medication



Trial name	Comparator	Endpoint	RCT result	RWE results	Stand. Diff.	Test	Agreement		
TRITON-TIMI	Prasugrel vs clopidogrel	3P MACE	0.81 (0.73, 0.90)	0.88 (0.79, 0.97)	-1.11	Sup	RA	EA	SD
PLATO	Ticagrelor vs clopidogrel	3P MACE	0.84 (0.77, 0.92)	0.92 (0.83, 1.02)	-1.31	Sup	-	EA	SD
ISAR-REACT5	Ticagrelor vs prasugrel	3P MACE	1.36 (1.09, 1.70)	--	--	Sup	--	--	--



Wiviott et al, NEJM 2007



Take-home points:

- RCT shows early and immediate effect – starting FU while in hospital
- RWE study question targets patients who survive until discharge and fill 1st Rx
- Cannot capture early effect without linked hospital + outpatient Rx data



Emulation Challenges



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- Population distribution
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- Outcome emulation (good, moderate)
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- In-hospital start of medication
- **Dose titration protocol during follow-up**
- Delayed effect with a long follow-up window
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- Discontinuation of maintenance therapy at randomization
- Robustness

Dose-titration during follow up



Trial name	Comparator	Endpoint	RCT result	RWE results	Stand. Diff.	Test	Agreement		
TRITON-TIMI	Prasugrel vs clopidogrel	3P MACE	0.81 (0.73, 0.90)	0.88 (0.79, 0.97)	-1.11	Sup	RA	EA	SD
PLATO	Ticagrelor vs clopidogrel	3P MACE	0.84 (0.77, 0.92)	0.92 (0.83, 1.02)	-1.31	Sup	-	EA	SD
ISAR-REACT5	Ticagrelor vs prasugrel	3P MACE	1.36 (1.09, 1.70)	--	--	Sup	--	--	--

“We compared ticagrelor (180-mg loading dose, 90 mg twice daily thereafter) and clopidogrel (300-to-600-mg loading dose, 75 mg daily thereafter)”

Wallentin, NEJM 2009

“The first 3 weeks patients will receive rivaroxaban 15 mg twice-daily followed by rivaroxaban 20 mg once-daily.” (EINSTEIN protocol)

Good

Moderate

Poor

Trial name	Comparator	Endpoint	RCT result	RWE results	Stand. Diff.	Test	Agreement		
EINSTEIN-DVT	Rivaroxaban vs Enoxaparin/VKA	VTE	0.68 (0.44, 1.04)	0.75 (0.63, 0.89)	-0.42	NI	*	EA	SD
EINSTEIN-PE	Rivaroxaban vs Enoxaparin/VKA	VTE	1.12 (0.75, 1.68)	0.68 (0.58, 0.81)	2.21	NI	*	-	-



Emulation Challenges



- Inclusion-exclusion emulation
- Population distribution
- Comparator emulation (good, moderate, poor)
- Outcome emulation (good, moderate)
- Placebo control
- In-hospital start of medication
- Dose titration protocol during follow-up
- **Delayed effect with a long follow-up window**
- Run-in window
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- Robustness

Delayed treatment effects

HORIZON-PIVOTAL (osteoporosis, hip fracture)

RCT

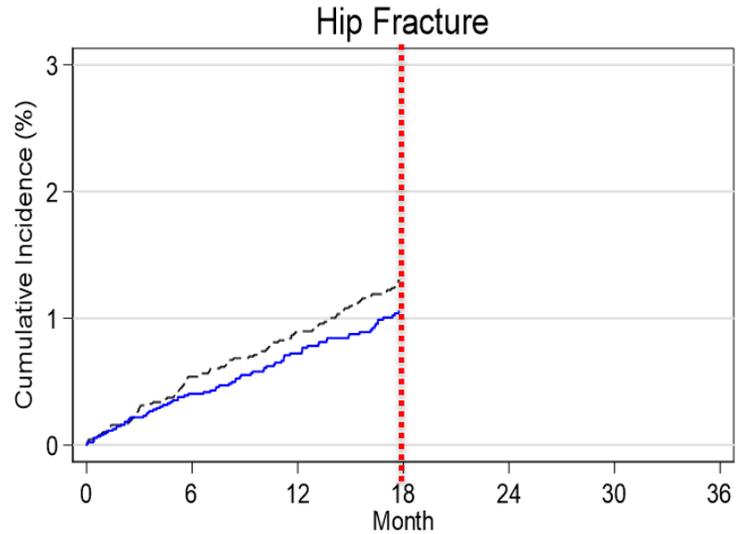
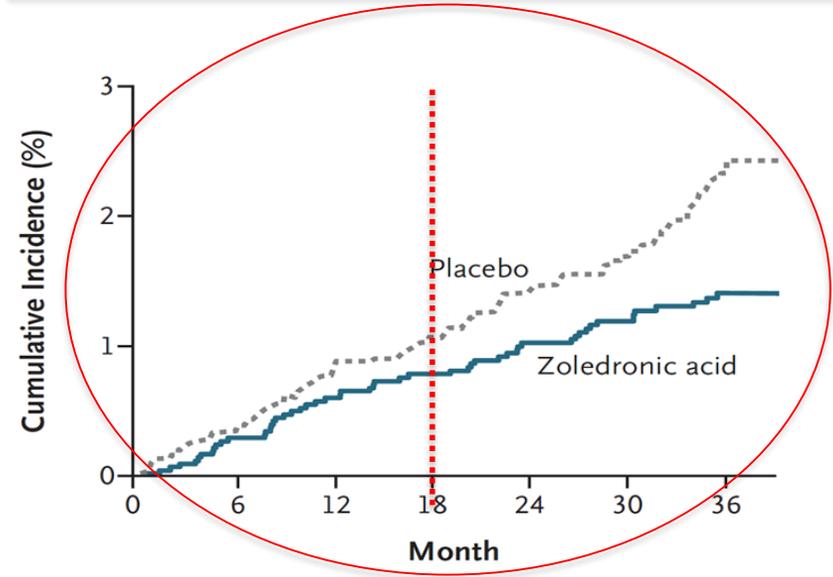
$HR_{36mo} = 0.59 (0.42, 0.83)$

$HR_{18mo} = 0.75$

RWE

$HR_{36mo} = ??$

$HR_{18mo} = 0.75 (0.58, 0.97)$

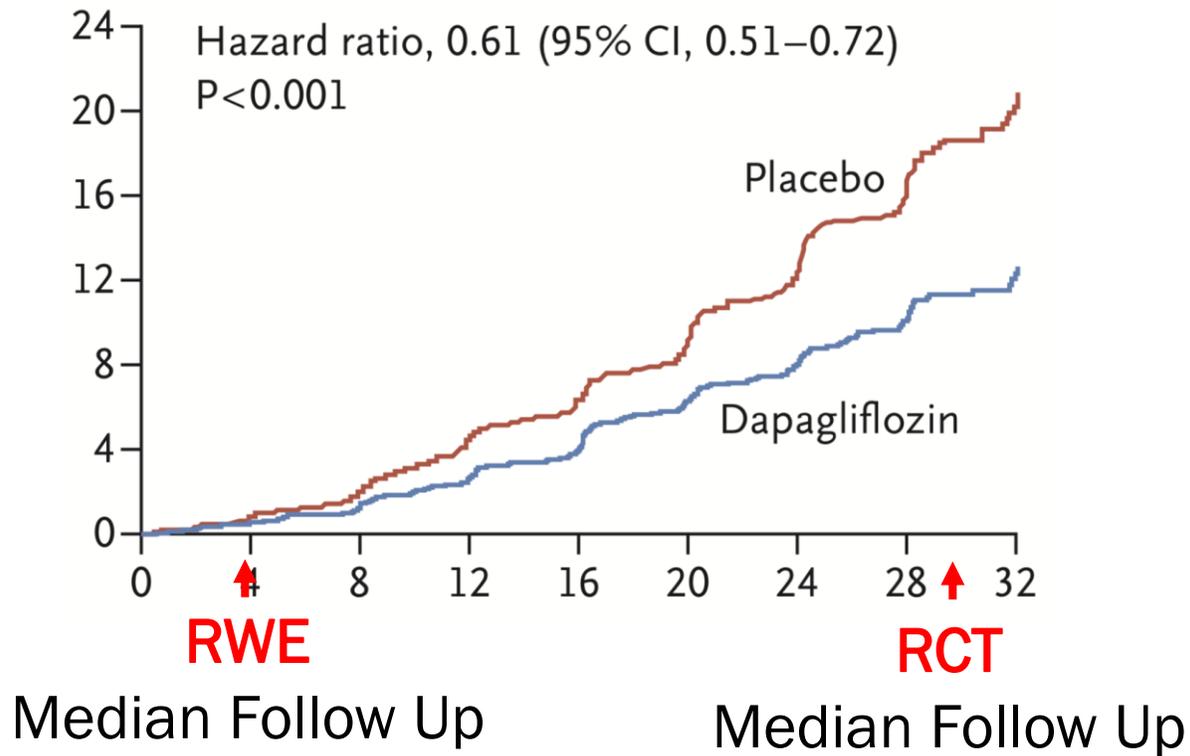


No. at Risk	0	6	12	18	24	30	36
Zoledronic acid	3875	3807	3674	3553	3494	3387	3161
Placebo	3861	3806	3694	3577	3499	3397	3144

Number at risk	0	6	12	18	24	30	36
Raloxifene	9003	7753	6768	0	0	0	0
Zoledronic acid	9003	7766	6743	0	0	0	0

Delayed effect with long follow up

Trial name	Comparator	Endpoint	RCT result	RWE results	Stand. Diff.	Test	Agreement		
DAPA-CKD	Dapagliflozin vs placebo	Sustained decline in eGFR, ESRD, death	0.61 (0.51, 0.72)	0.80 (0.52, 1.26)	-1.10	Sup	-	-	SD



Good

Moderate

Poor



Emulation Challenges



- Inclusion-exclusion emulation
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- Outcome emulation (good, moderate)
- Placebo control
- In-hospital start of medication
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- Run-in window
- Discontinuation of maintenance therapy at randomization
- Robustness

On placebo
Both treatment groups
On 1 treatment arm



Discontinuation of maintenance therapy → short term ↑ exacerbation

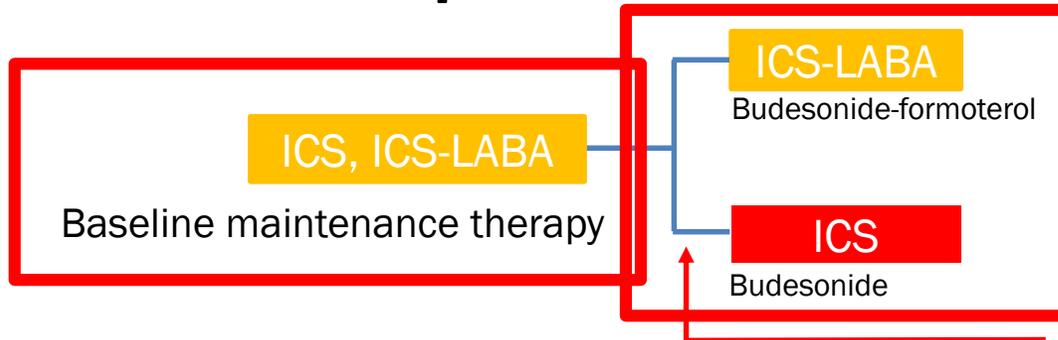
D5896

Treatment: ICS-LABA vs ICS

Outcome: Serious asthma related events

ICS = inhaled corticosteroid

LABA = long-acting beta agonist



Discontinues LABA therapy

Assumptions Scenario 1 (our RWE emulation):

- Truth is upper bound of non-inferiority limit (1.32)
- 50% of patients were on LABA at baseline
- No effect of discontinuation

		Randomized	
		ICS-LABA	ICS
Baseline	No LABA use	29	22
	LABA use	29	22
		58	44

$$RR = 58/44 = 1.32$$

Assumptions Scenario 2:

- Truth is upper bound of non-inferiority limit (1.32)
- 50% of patients were on LABA at baseline
- *Discontinuation increases risk of outcome by 50%*

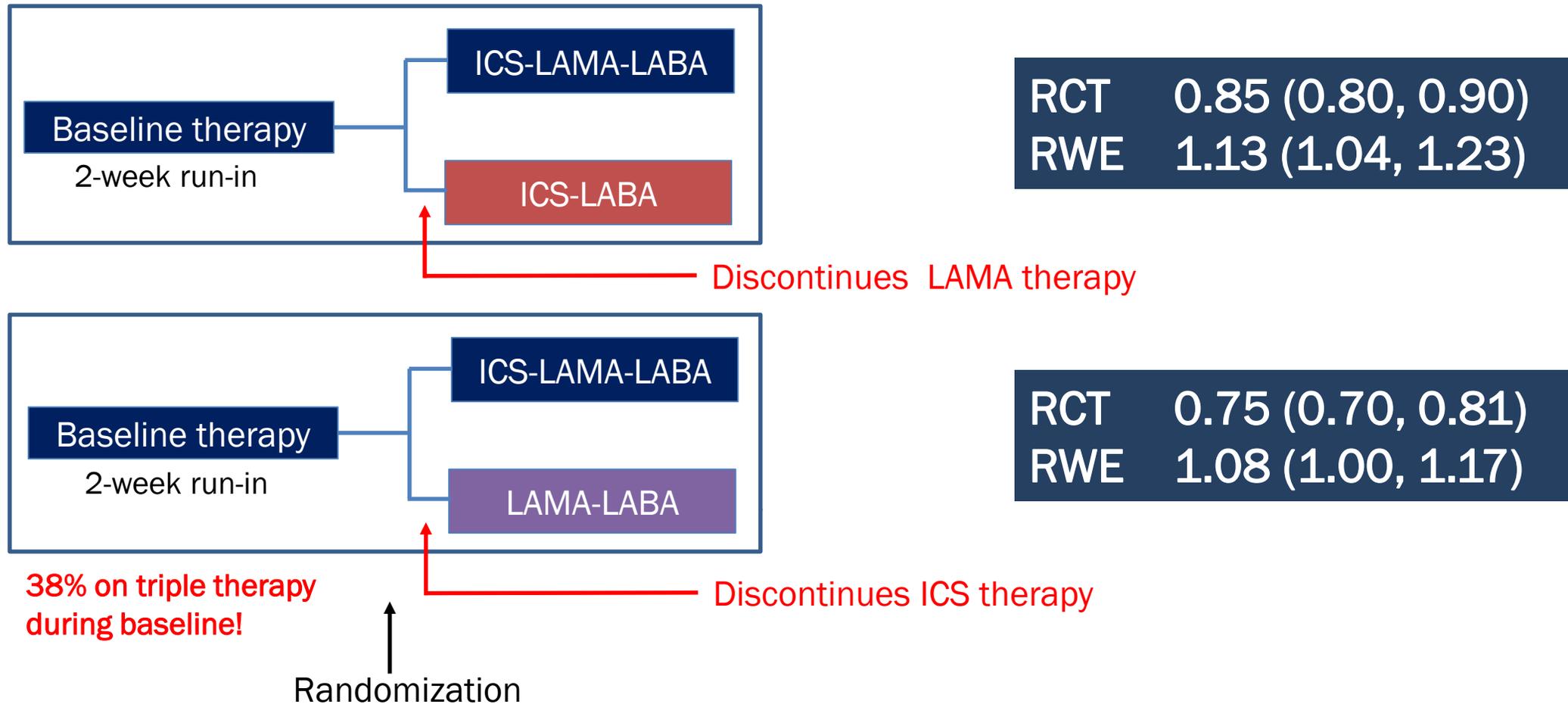
		Randomized	
		ICS-LABA	ICS
Baseline	No LABA use	29	22
	LABA use	29	22+11
		58	55

$$RR = 58/55 = 1.05$$

D5896 1.07 (0.70, 1.65)
Pooled RWD 1.38 (0.90, 2.13)

RCT: D/c of maintenance therapy → short term increase in exacerbation
RWE: Confounding by stage of therapy/disease severity

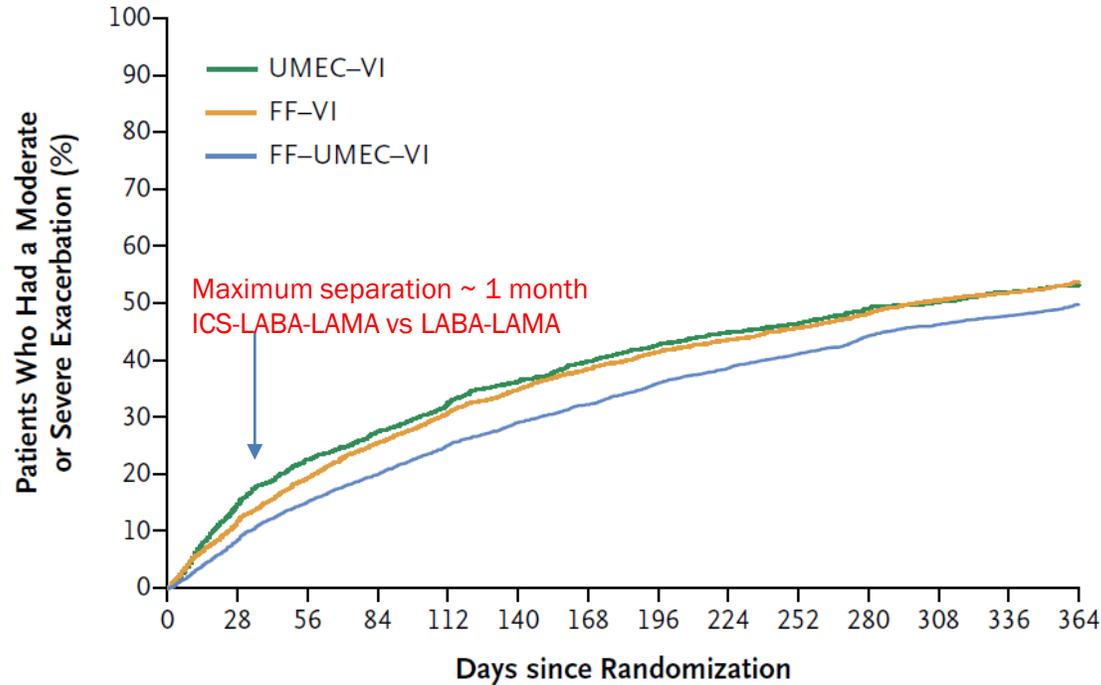
IMPACT trial and COPD exacerbation event



RCT: D/c of maintenance therapy → short term increase in exacerbation

IMPACT trial and COPD exacerbation event

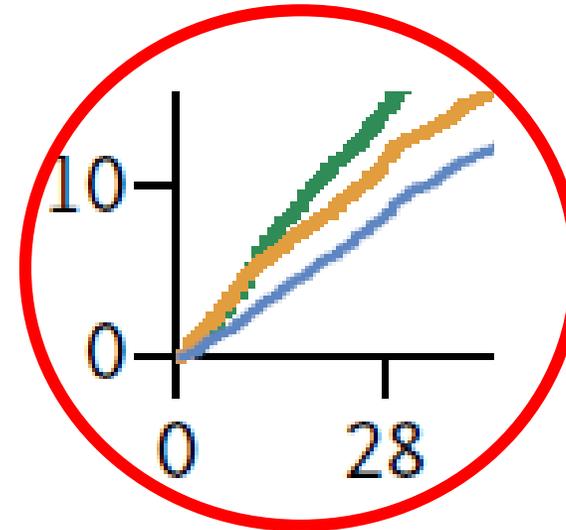
B Time-to-First-Event Analysis



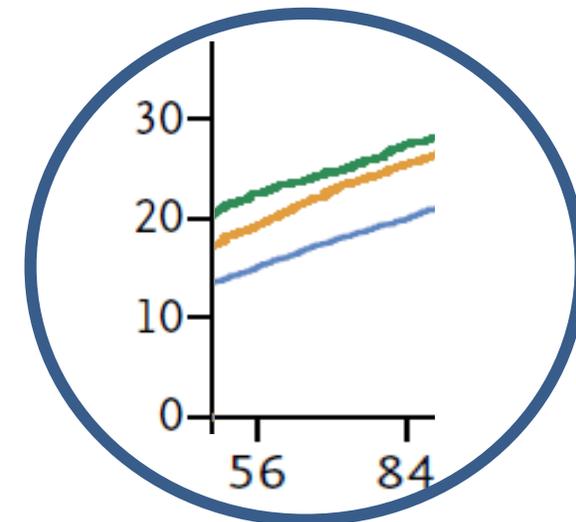
No. at Risk

UMEC-VI	2070	1721	1516	1406	1301	1201	1123	1059	1001	971	917	884	851	642
FF-VI	4134	3554	3133	2838	2620	2410	2250	2120	2004	1823	1823	1729	1671	1228
FF-UMEC-VI	4151	3758	3408	3186	2954	2752	2614	2457	2324	2216	2085	1988	1919	1419

First 30-day interval = treatment effect



Second 30-day interval = no treatment effect



Suissa S, Ariel A. Triple therapy trials in COPD: a precision medicine opportunity. Eur Respir J 2018; 52: 1801848 [https://doi.org/10.1183/13993003.01848-2018].



Emulation Challenges



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- Outcome emulation (good, moderate)
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- Run-in window
- Discontinuation of maintenance therapy at randomization
- **Robustness**

Robustness of findings across multiple data sources

For 2 out of 32 trials, we observed results that diverged by database and could not be pooled.



ISAR-REACT5

Ticagrelor vs prasugrel on 3PMACE

	Result
RCT	1.36 (1.09, 1.70)
MarketScan	1.20 (0.95, 1.51)
Optum	0.73 (0.52, 1.01)
Pooled	n/a

} p for homogeneity <0.03

VERO

Teriparatide vs risedronate on vertebral fracture

	Result
RCT	0.44 (0.29, 0.68)
MarketScan	1.33 (0.80, 2.20)
Optum	0.43 (0.19, 0.96)
Pooled	n/a

Take-home point:

- Important to replicate in multiple databases

“substantial evidence of effectiveness...2 adequate and well controlled investigations”

FDA Guidance for Industry

Robustness to alternative design/analysis specifications

For 2 out of 32 trials, colleagues independently asked similar questions using the same data sources

Take-home point:

- Important to investigate robustness of evidence to reasonable alternative choices

Desai et al.

PARADIGM	0.80 (0.73, 0.87)
RCT-DUPLICATE	0.97 (0.87-1.08)
Initiators of ACE/ARB vs sacubitril/valsartan	0.92 (0.84, 1.00)
Switchers from ACE to ARB vs sacubitril/valsartan	0.79 (0.74, 0.85)
Combined	0.84 (0.80, 0.89)

ON-TARGET	1.0 (0.9-1.1)
RCT-DUPLICATE	0.8 (0.8-0.9)
Fralick et al. RWE JAMA-IM	1.0 (0.9-1.1)

JAMA Internal Medicine | Original Investigation
Use of Health Care Databases to Support Supplemental Indications of Approved Medications

Michael Fralick, MD; Aaron S. Kesselheim, MD, JD, MPH; Jerry Avorn, MD; Sebastian Schneeweiss, MD, ScD

Original research

Effectiveness of angiotensin-neprilysin inhibitor treatment versus renin-angiotensin system blockade in older adults with heart failure in clinical care

Rishi J Desai ,¹ Elisabetta Patorno,¹ Muthiah Vaduganathan,² Mufaddal Mahesri,¹ Kristyn Chin,¹ Raisa Levin,¹ Scott D Solomon,² Sebastian Schneeweiss¹



Investigating subtle differences in exposure, outcome, inclusion-exclusion criteria, covariates, follow-up





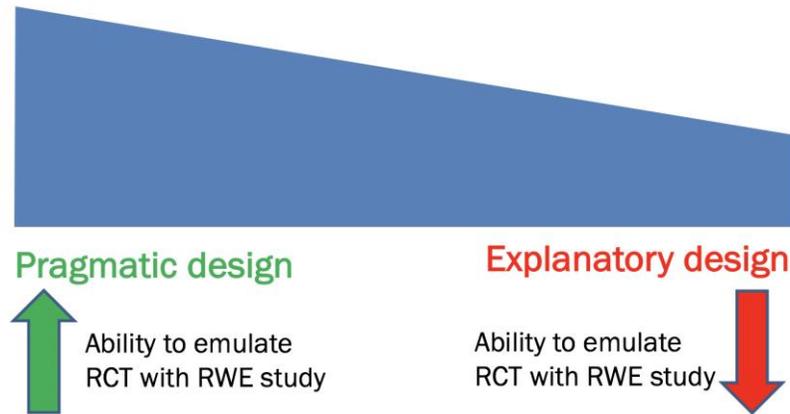
Outline

Emulation
Challenges

Example



Lessons
Learned





Challenges with emulation of trial design expected to shift the target question for RWE study vs RCT

- a) Start of follow up in hospital (hospital Rx data not available in claims, but may be available in linked data)
- b) Run-in that selects responders to one treatment arm
- c) Mixing effect of randomization and discontinuation of baseline maintenance therapy
- d) Delayed effect over long follow up
- e) Differences in population distribution coupled with effect modification
- f) Inadequate emulation of the exposure or outcome

Few emulation challenges = None of { a, b, c, d } AND comparator and outcome emulation are at least moderate, with >1 classified as good

More emulation challenges = a OR b OR c OR d OR poor comparator emulation OR neither comparator and outcome emulation are classified as good

Few emulation challenges vs more emulation challenges

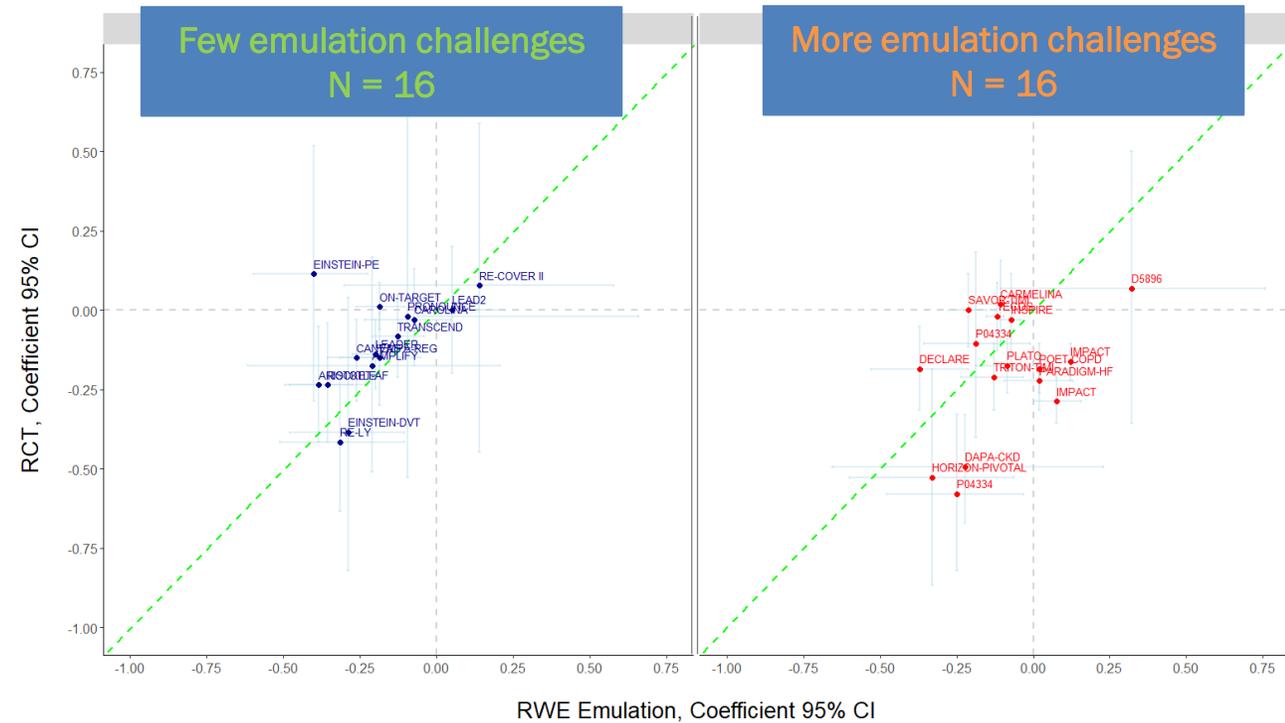


Pearson's overall = 0.80; 0.63-0.90



	Few emulation challenges N = 16	More emulation challenges N = 16
Pearson's	0.93 (0.79, 0.97)	0.46 (-0.05, 0.78)
ICC, 95% CI	0.89 (0.68, 0.96)	0.41 (-0.03, 0.73)
RA	12 (75%)	6 (38%)
EA	14 (88%)	7 (44%)
SD	14 (88%)	10 (63%)

ICC = intraclass correlation coefficient; CI = confidence interval; RA = regulatory agreement; EA = estimate agreement; SD = standardized difference agreement



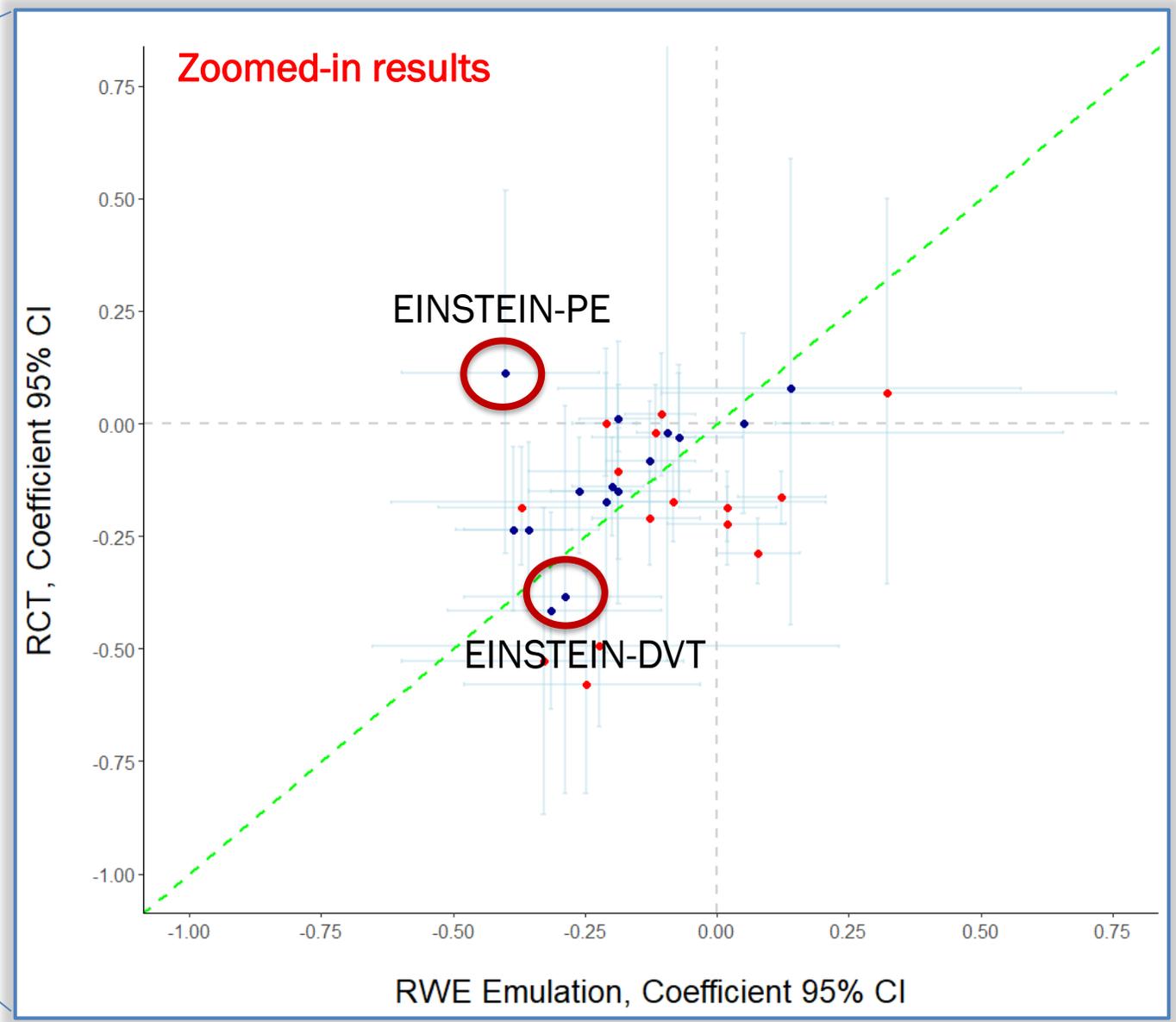
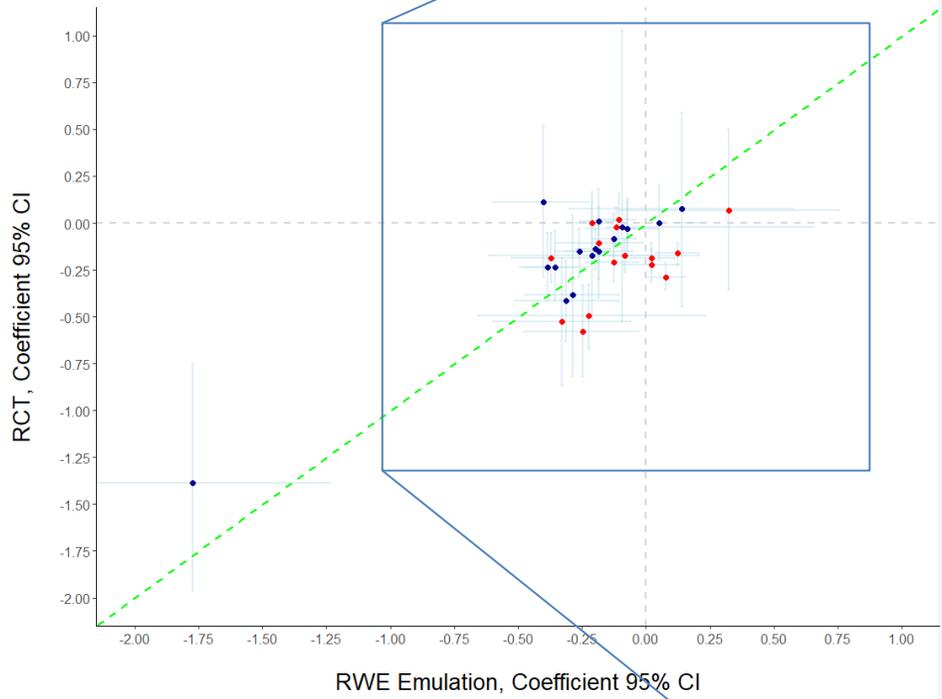
Take-home points:

Recall: For this methods project, the goal was to emulate published RCTs as closely as possible:

- Few emulation challenges → closer agreement in effect estimates
- More emulation challenges → less agreement in RCT/RWE effect estimates: diverge on target question/popⁿ?
Different answers may be correct.

32 RCT-RWE emulation results

Pearson's overall = 0.80; 0.63-0.90



- Few emulation challenges
- More emulation challenges

Chance or other factors?



Trial name	Comparator	Endpoint	RCT	RWE	Stand. Diff.	Test	Agreement			Indication
EINSTEIN-DVT	Rivaroxaban vs Enoxaparin/VKA	VTE	0.68 (0.44, 1.04)	0.75 (0.63, 0.89)	-0.42	NI	*	EA	SD	DVT
EINSTEIN-PE	Rivaroxaban vs Enoxaparin/VKA	VTE	1.12 (0.75, 1.68)	0.68 (0.58, 0.81)	2.21	NI	-	-	-	PE

It remains unclear why EINSTEIN-DVT and EINSTEIN-PE trials have separating results. Meta-analysis of 6 trials* finds **no heterogeneity of effects in patients presenting with DVT or PE.**

*Dentali F, et al. Intern Emerg Med. 2015

Good

Moderate

Poor

Take-home points

1. RWE studies come to the same conclusions as RCTs when we are able to emulate well, i.e. target the same question
2. There is more nuance to evaluation of replicability of trial results with RWE than can be found in binary agreement metrics.
 - Residual bias, random error
 - Efficacy vs effectiveness
 - Single trial as reference standard
3. In evaluating when and how RWE studies complement RCTs, we should think about the target trial design that would match the need/question of end users (ideal vs pragmatic)

With data that are fit-for-purpose and proper design and analysis, non-randomized real-world evidence studies can come to similar conclusions about a drug's treatment effect as randomized trials



Discussion



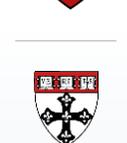
Future: calibrating our RWE tool kit

- Repository of well-documented studies that illustrate the agreement between RCTs and RWE when the RWE study is designed to emulate the RCT as closely as possible.
- May serve as reference points to assess validity in RWE:
 - By therapeutic area
 - By data source
 - By type of comparator
 - By type of outcome
 - Further categorizations like:
 - Population
 - Length of follow-up
- A repository of case studies would
 - Increase predictability of future RWE studies
 - Increase the use of common methodological approaches emulating target trials
 - Point out areas that are currently difficult to address with RWE and highlight the need to improve data sources



Summary of take-home messages (in more detail)

- Divergence in RCT and RWE findings can come from many sources, most likely emulation differences and confounding
- Published trial is an imperfect benchmark to calibrate against if trial didn't ask the same question targeted by RWE study
- Single trial was used as reference standard for causal effects and sometimes there is substantial variation between trials
- Challenging to emulate:
 - Explanatory design features (e.g. run-in that selects responders)
 - Findings for outcomes with long induction or time varying hazard
 - Patients in clinical practice may not experience benefit observed in explanatory trials
 - If circumstances of use of comparator is different from the exposure of interest in clinical practice (e.g. imbalanced cost, prior-authorization)
- Important to:
 - Explore and understand robustness of evidence to reasonable alternative choices
 - Evaluate replicability of RWE in multiple data sources



Harvard study team:



Faculty: Drs. Schneeweiss, Wang, Franklin, Glynn, Patorno, Desai, Choudhry, Huybrechts, Fischer, Feldman, Gagne, Bykov

Research Staff: Bessette, Dr. D'Andrea, Chin, Gautham, Dr. Gopalakrishna, Jawaaid, Jin, Lee, Dr. Mahesri, Dr. Pawar, Sears, Sreedhara, Tesfaye, Umarje, York, Zabolka, Zakoul

Action team: AETION[®]

Drs. Garry, Rassen, and Isaman, Gibbs, Gilpin

FDA colleagues:



Drs. Martin, Quinto, Concato, Corrigan-Curay, Paraoan, Bradley, and Li

Expert advisor panel:*

Drs. Steve Goodman, Stanford; Miguel Hernan, Harvard; Wayne Ray, Vanderbilt; Samy Suissa, McGill; Alan Brookhart, Duke

*While we are most grateful for the advice we received, the authors are solely responsible for the presented work



Back up slides





Emulation Challenges



- Inclusion-exclusion emulation
- Population distribution
- Comparator emulation (good, moderate, poor)
- Outcome emulation (good, moderate)
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- Dose titration protocol during follow-up
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DUPLICATE Diabetes Trial Emulations

Diabetes



Trial name	Comparator emulation	Endpoint emulation ⁺	RCT result		Stand. Diff.	Test	Agreement		
			RCT result	RWE results			RA	EA	SD
LEADER	Liraglutide vs placebo	3P MACE	0.87 (0.78, 0.97)	0.82 (0.76, 0.87)	0.90	NI	RA	EA	SD
DECLARE	Dapagliflozin vs placebo	HHF + CV death	0.83 (0.73, 0.95)	0.69 (0.59, 0.81)	1.76	NI	RA	-	SD
EMPA-REG	Empagliflozin vs placebo	3P MACE	0.86 (0.74, 0.99)	0.83 (0.73, 0.95)	0.35	NI	RA	EA	SD
CANVAS	Canagliflozin vs placebo	3P MACE	0.86 (0.75, 0.97)	0.77 (0.70, 0.85)	1.34	NI	RA	EA	SD
CARMELINA	Linagliptin vs placebo	3P MACE	1.02 (0.89, 1.17)	0.90 (0.84, 0.96)	1.61	NI	*	EA	SD
TECOS	Sitagliptin vs placebo	3P MACE + angina	0.98 (0.88, 1.09)	0.89 (0.86, 0.91)	1.71	NI	*	EA	SD
SAVOR-TIMI	Saxagliptin vs placebo	3P MACE	1.00 (0.89, 1.12)	0.81 (0.76, 0.86)	3.16 [¶]	NI	*	-	-
CAROLINA	Linagliptin vs glimepiride	3P MACE	0.98 (0.84, 1.14)	0.91 (0.79, 1.05)	0.70	NI	RA	EA	SD
LEAD2	Liraglutide vs glimepiride	Change in hbA1c	0.0 (-0.2, 0.2)	0.05 (-0.11, 0.22)		NI	RA	EA	SD

Better placebo proxy

Worse placebo proxy

Missing HbA1c

Good
Moderate
Poor

Placebo control

(2nd line diabetes drug – DPP4i vs sulfonylureas, 3P MACE)

Trial name	Comparator emulation	Endpoint emulation ⁺	RCT result	RWE results	Stand. Diff.	Test	Agreement		
CARMELINA	Linagliptin vs placebo	3P MACE	1.02 (0.89, 1.17)	0.90 (0.84, 0.96)	1.61	NI	*	EA	SD
TECOS	Sitagliptin vs placebo	3P MACE + angina	0.98 (0.88, 1.09)	0.89 (0.86, 0.91)	1.71	NI	*	EA	SD
SAVOR-TIMI	Saxagliptin vs placebo	3P MACE	1.00 (0.89, 1.12)	0.81 (0.76, 0.86)	3.16 [¶]	NI	*	–	–
CAROLINA	Linagliptin vs glimepiride	3P MACE	0.98 (0.84, 1.14)	0.91 (0.79, 1.05)	0.70	NI	RA	EA	SD

- Good
- Moderate
- Poor

Comparator emulation

- Expensive new drug vs older cheap drug
- Difficult to capture SES differences?

Placebo control

(2nd line diabetes drug – GLP1, SGLT2i vs DPP4i, 3P MACE)

Trial name	Comparator emulation	Endpoint emulation ⁺	RCT result	RWE results	Stand. Diff.	Test	Agreement		
1 LEADER	Liraglutide vs placebo	3P MACE	0.87 (0.78, 0.97)	0.82 (0.76, 0.87)	0.90	NI	RA	EA	SD
2 DECLARE	Dapagliflozin vs placebo	HHF + CV death	0.83 (0.73, 0.95)	0.69 (0.59, 0.81)	1.76	NI	RA	–	SD
3 EMPA-REG	Empagliflozin vs placebo	3P MACE	0.86 (0.74, 0.99)	0.83 (0.73, 0.95)	0.35	NI	RA	EA	SD
4 CANVAS	Canagliflozin vs placebo	3P MACE	0.86 (0.75, 0.97)	0.77 (0.70, 0.85)	1.34	NI	RA	EA	SD

Good

Moderate

Poor

Comparator emulation

- Comparing expensive newer drugs
- Closer therapeutic alternatives

LEAD2 – hbA1c outcome, multiple imputation

STEP 1 – Missing data exploration

1. Assumption that HbA1c values at the end of follow-up were missing at random (MAR)
2. Examined number and proportion of missing values for each censoring reason
3. Compared baseline characteristics of patients with and without missing values

STEP 2 – MI model specification

Selection of independent variables:

1. Auxiliary variables:
 - ❖ Variables that were imbalanced between patients with (n. 479) vs without (n. 267) an HbA1c lab result during follow-up
 - ❖ Variables associated with difference in HbA1c from baseline to follow up
2. Analytical variable: Variable from analytical model (**exposure**)

List of auxiliary variables

Age
Gender
Race
Hypertension
Hyperlipidemia
Cerebrovascular diseases
Diabetic Neuropathy
Mood Disorders
Use of statins or other lipid lowering drugs
Business type
Frailty Score

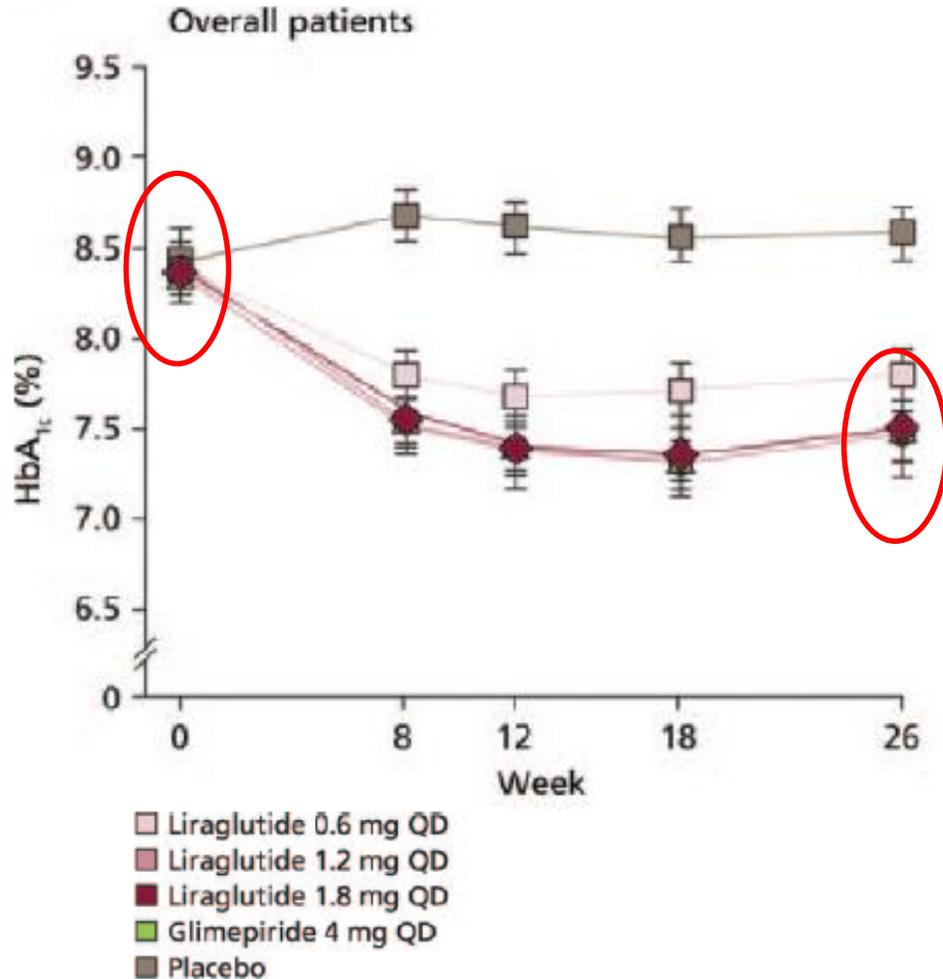
STEP 3 – MI analysis specification:

1. Imputation phase (n. of imputations = 15)
2. Analysis phase – ANALYTICAL MODEL: Outcome (HbA1c difference) = exposure (liraglutide = 1; glimepiride = 0)
3. Pooling phase

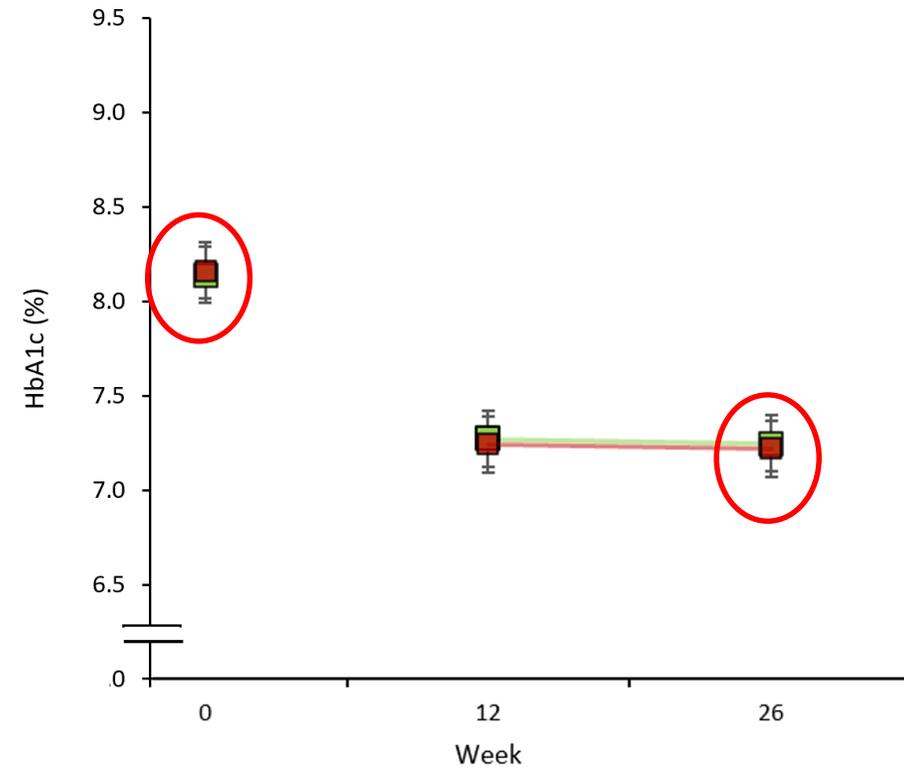
Results - HbA_{1c} levels over time

HbA _{1c}	LEAD2	RWD
Baseline	8.4	8.2
6 months	7.5	7.3

LEAD2 Trial



DUPLICATE - RWE Lead-2 Trial



RCT 0.0 (-0.2, 0.2)
RWE 0.1 (-0.1, 0.2)

Emulation Challenges

- Inclusion-exclusion emulation
- Population distribution
- Comparator emulation (good, moderate, poor)
- Outcome emulation (good, moderate)
- Placebo control
- In-hospital start of medication
- **Dose titration protocol during follow-up**
- **Delayed effect with a long follow-up window**
- Run-in window
- Discontinuation of maintenance therapy at randomization
- Robustness

In-hospital start of medication



Trial name	Comparator	Endpoint	RCT result	RWE results	Stand. Diff.	Test	Agreement		
TRITON-TIMI	Prasugrel vs clopidogrel	3P MACE	0.81 (0.73, 0.90)	0.88 (0.79, 0.97)	-1.11	Sup	RA	EA	SD
PLATO	Ticagrelor vs clopidogrel	3P MACE	0.84 (0.77, 0.92)	0.92 (0.83, 1.02)	-1.31	Sup	-	EA	SD
ISAR-REACT5	Ticagrelor vs prasugrel	3P MACE	1.36 (1.09, 1.70)	--	--	Sup	--	--	--

MarketScan 1.20 (0.95, 1.51)
 Optum 0.73 (0.52, 1.01)
 P for homogeneity 0.01

Good

Moderate

Poor

Variation in co-medication in multi-national trials

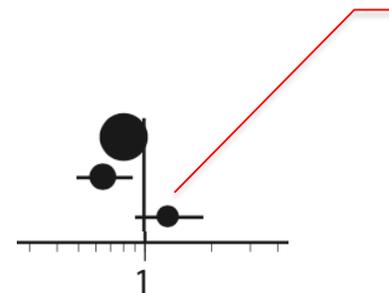


Trial name	Comparator	Endpoint	RCT result	RWE results	Stand. Diff.	Test	Agreement		
TRITON-TIMI	Prasugrel vs clopidogrel	3P MACE	0.81 (0.73, 0.90)	0.88 (0.79, 0.97)	-1.11	Sup	RA	EA	SD
PLATO	Ticagrelor vs clopidogrel	3P MACE	0.84 (0.77, 0.92)	0.92 (0.83, 1.02)	-1.31	Sup	-	EA	SD
ISAR-REACT5	Ticagrelor vs prasugrel	3P MACE	1.36 (1.09, 1.70)	--	--	Sup	--	--	--

PLATO's treatment effect was not established among US participants possibly due to high aspirin dosing in the US compared to Europe

PLATO and regional variation:*

	N	Ticagrelor	Clopidogrel	HR (95% CI)
All Countries	18624	9.8	11.7	0.84 (0.77, 0.92)
	2666	7.5	10.8	0.69 (0.53, 0.90)
USA	1413	12.6	10.1	1.27 (0.92, 1.75)



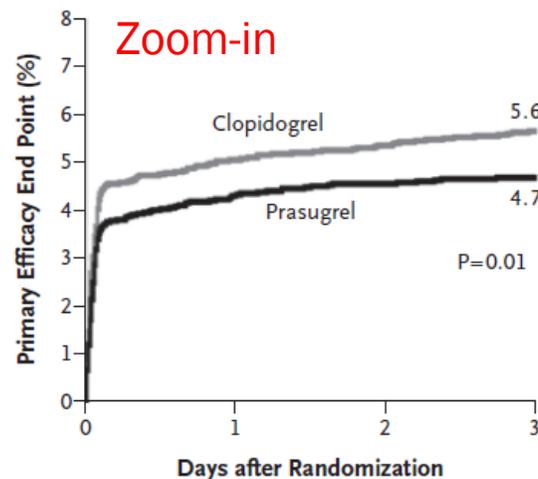
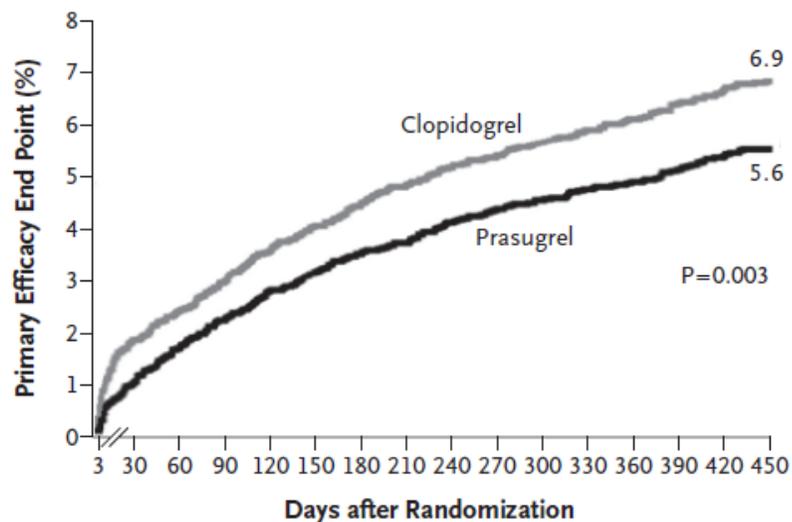
Note: RCT-DUPLICATE used U.S. data sources only

* Mahaffey KW et al. Circ 2011

In-hospital start of medication



Trial name	Comparator	Endpoint	RCT result	RWE results	Stand. Diff.	Test	Agreement		
TRITON-TIMI	Prasugrel vs clopidogrel	3P MACE	0.81 (0.73, 0.90)	0.88 (0.79, 0.97)	-1.11	Sup	RA	EA	SD
PLATO	Ticagrelor vs clopidogrel	3P MACE	0.84 (0.77, 0.92)	0.92 (0.83, 1.02)	-1.31	Sup	-	EA	SD
ISAR-REACT5	Ticagrelor vs prasugrel	3P MACE	1.36 (1.09, 1.70)	--	--	Sup	--	--	--



take-home points:

- RCT shows early and immediate effect – starting FU while in hospital
- RWE study question targets patients who survive until discharge and fill 1st Rx
- Cannot capture early effect without linked hospital + outpatient Rx data

In-hospital start of medication



Trial name	Comparator	Endpoint	RCT result	RWE results	Stand. Diff.	Test	Agreement		
TRITON-TIMI	Prasugrel vs clopidogrel	3P MACE	0.81 (0.73, 0.90)	0.88 (0.79, 0.97)	-1.11	Sup	RA	EA	SD
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ISAR-REACT5	Ticagrelor vs prasugrel	3P MACE	1.36 (1.09, 1.70)	--	--	Sup	--	--	--

Criticisms of ISAR-REACT5

- 83% had only telephone follow up, 7% written correspondence
- ITT analysis, ~1/3 or more discontinued therapy
- Compared different treatment strategies, not therapies
- Surprisingly low prasugrel outcome rate compared to prior trials

1 year event rates from trials*

	Prasugrel	Ticagrelor	Clopidogrel
TRITON-TIMI	9.9		12.1
PLATO		9.8	11.7
ISAR-REACT5	6.8	9.3	

*TRITON-TIMI and PLATO outcome: *cardiovascular death*, stroke, MI
 ISAR-REACT outcome: *all-cause death*, stroke, MI

Emulation Challenges

- Inclusion-exclusion emulation
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- Delayed effect with a long follow-up window
- Run-in window
- **Discontinuation of maintenance therapy at randomization**
- Robustness



Trial name	Comparator	Endpoint	RCT result	RWE results	Stand. Diff.	Test	Agreement		
ARISTOTLE	Apixaban vs warfarin	Stroke/systemic embolism	0.79 (0.66, 0.95)	0.68 (0.61, 0.76)	1.36	NI	RA	EA	SD
RE-LY	Dabigatran vs warfarin	Stroke/systemic embolism	0.66 (0.53, 0.82)	0.73 (0.60, 0.90)	-0.66	NI	RA	EA	SD
ROCKET-AF	Rivaroxaban vs warfarin	Stroke/systemic embolism	0.79 (0.66, 0.96)	0.70 (0.62, 0.80)	1.00	NI	RA	EA	SD

“Patients taking VKAs at the time of randomization stopped their VKA drug on the day of randomization and began the assigned drug when the INR fell <2.0 (if randomized to dabigatran) or <3.0 (if randomized to warfarin).”

- RE-LY rationale and design, Ezekowitz, et al, American Heart Journal 2009

take-home points:

- Trials included treatment naïve initiators and prevalent users who “switched” versus “continued” after a washout (similar estimates in both strata)
- RWE studies included patients who were initiators after 6-month washout

Emulation Challenges

- Inclusion-exclusion emulation
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Summary:

5 DOAC – VTE trials for different indications

Trial name	Comparator	Endpoint	RCT result	RWE results	Stand. Diff.	Test	Agreement			Indication
RE-COVER II	Dabigatran vs Warfarin	VTE, VTE related death	1.08 (0.64, 1.80)	1.10 (0.76, 1.60)	-0.06	NI	RA	EA	SD	VTE
AMPLIFY	Apixaban vs Enoxaparin/Warfarin	VTE, VTE related death	0.84 (0.60, 1.18)	0.76 (0.53, 1.09)	0.40	NI	RA	EA	SD	VTE
EINSTEIN-DVT	Rivaroxaban vs Enoxaparin/VKA	VTE	0.68 (0.44, 1.04)	0.75 (0.63, 0.89)	-0.42	NI	*	EA	SD	DVT
EINSTEIN-PE	Rivaroxaban vs Enoxaparin/VKA	VTE	1.12 (0.75, 1.68)	0.68 (0.58, 0.81)	2.21	NI	*	-	-	PE
RECORD1	Rivaroxaban vs Enoxaparin	VTE/ all cause death	0.25 (0.14, 0.47)	0.17 (0.10, 0.29)	0.91	NI	RA	EA	SD	Hip

Good

Moderate

Poor

Summary:

5 DOAC – VTE trials for different indications

Trial name	Comparator	Endpoint	RCT result	RWE results	Stand. Diff.	Test	Agreement			Indication
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EINSTEIN-PE	Rivaroxaban vs Enoxaparin/VKA	VTE	1.12 (0.75, 1.68)	0.68 (0.58, 0.81)	2.21	NI	*	-	-	PE
RECORD1	Rivaroxaban vs Enoxaparin	VTE/ all cause death	0.25 (0.14, 0.47)	0.17 (0.10, 0.29)	0.91	NI	RA	EA	SD	Hip

- Good
- Moderate
- Poor

It remains unclear why EINSTEIN-DVT and EINSTEIN-PE trials have separating results. Meta-analysis of 6 trials* finds no heterogeneity of effects in patients presenting with DVT or PE.

*Dentali F, et al. Intern Emerg Med. 2015

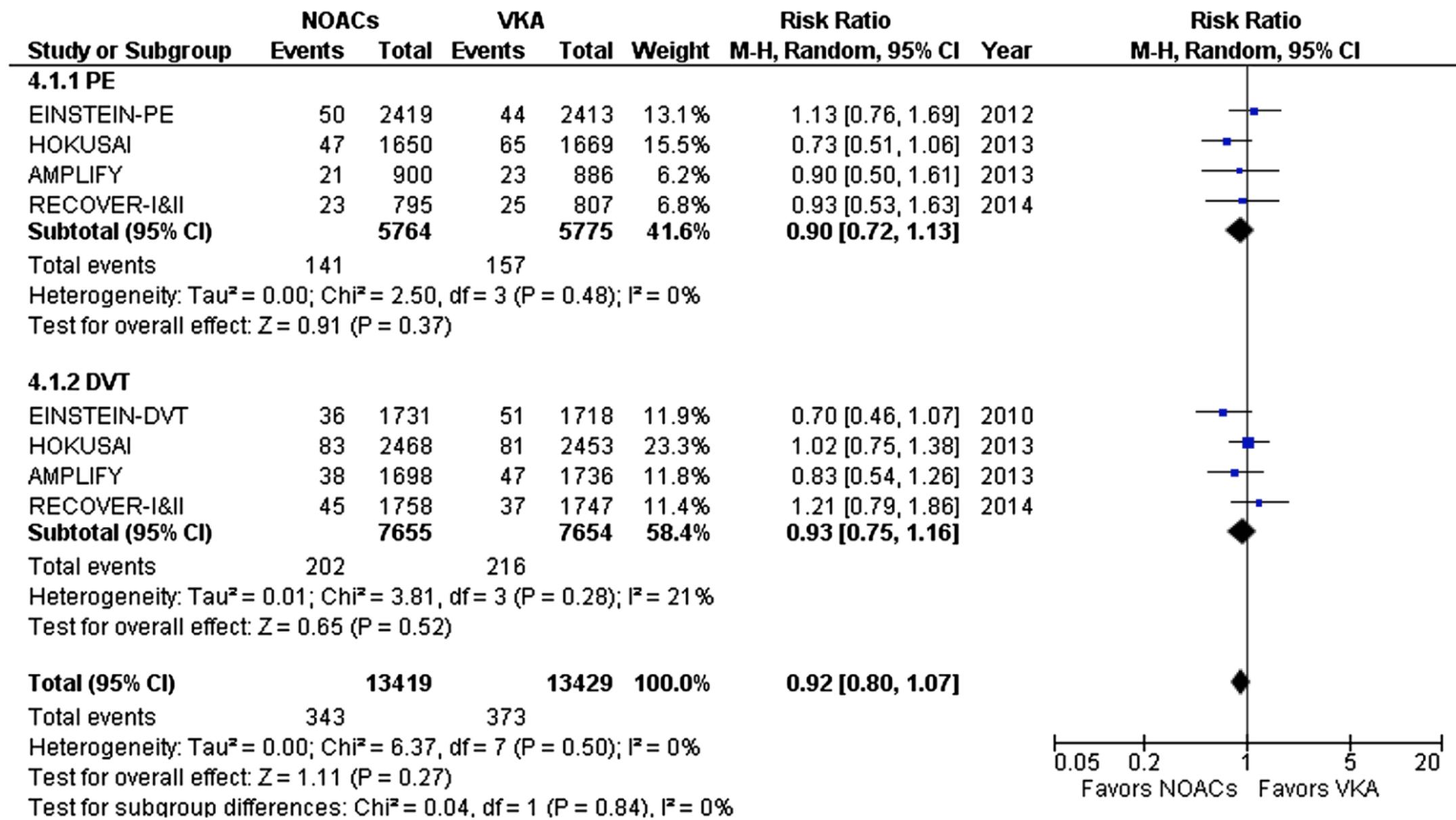


Fig. 1 Forest plot of the primary efficacy outcome (recurrent VTE or death related to VTE) in patients receiving non-vitamin K oral anticoagulants (NOACs) or vitamin K antagonists (VKA)

Summary:

5 DOAC – VTE trials for different indications

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EINSTEIN-PE	Rivaroxaban vs Enoxaparin/VKA	VTE	1.12 (0.75, 1.68)	0.68 (0.58, 0.81)	2.21	NI	*	-	-	PE
RECORD1	Rivaroxaban vs Enoxaparin	VTE/ all cause death	0.25 (0.14, 0.47)	0.17 (0.10, 0.29)	0.91	NI	RA	EA	SD	Hip

Good

Moderate

Poor

take-home points:

- Single trial was used as reference standard for causal effects.
- Sometimes trials don't agree.

Emulation Challenges

- Inclusion-exclusion emulation
- Population distribution
- **Comparator emulation (good, moderate, poor)**
- Outcome emulation (good, moderate)
- **Placebo control**
- In-hospital start of medication
- Dose titration protocol during follow-up
- Delayed effect with a long follow-up window
- **Run-in window**
- Discontinuation of maintenance therapy at randomization
- Robustness

Antihypertensives: Telmisartan



Trial name	Comparator	Endpoint	RCT result	RWE results	Stand. Diff.	Test	Agreement		
TRANSCEND	Telmisartan vs placebo	3P MACE + HHF	0.92 (0.81, 1.05)	0.88 (0.81, 0.96)	0.55	Sup	*	EA	SD
ON-TARGET	Telmisartan vs Ramipril	3P MACE + HHF	1.01 (0.94, 1.09)	0.83 (0.77, 0.90)	3.46	NI	–	–	–

ON-TARGET	1.0 (0.9-1.1)
Fralick et al. RWE JAMA-IM	1.0 (0.9-1.1)
RCT-DUPLICATE	0.8 (0.8-0.9)

Investigating subtle differences in exposure, outcome, inclusion-exclusion criteria, covariates, follow-up

- Good
- Moderate
- Poor

take-home point:

- Important to investigate robustness of evidence to reasonable alternative choices

Emulation Challenges

- Inclusion-exclusion emulation
- Population distribution
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- Placebo control
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- Delayed effect with a long follow-up window
- Run-in window
- Discontinuation of maintenance therapy at randomization
- Robustness

Delayed effect with long follow up



Trial name	Comparator	Endpoint	RCT result	RWE results	Stand. Diff.	Test	Agreement		
HORIZON-PIVOTAL	Zoledronic acid vs placebo	Hip Fracture	0.59 (0.42, 0.83)	0.72 (0.55, 0.94)	0.90	Sup	RA	EA	SD
VERO	Teriparatide vs risedronate	Vertebral fracture	0.44 (0.29, 0.68)	-	-2.54	Sup	-	-	-

MarketScan 1.33 (0.80, 2.20)
 Optum 0.43 (0.19, 0.96)
 P for homogeneity 0.02

Good

Moderate

Poor

Delayed treatment effects

HORIZON-PIVOTAL (osteoporosis, hip fracture)

RCT

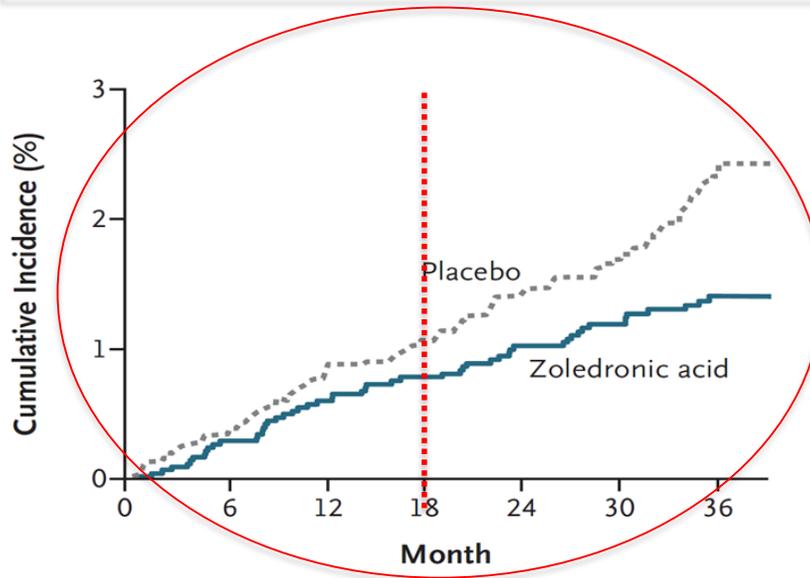
$HR_{36mo} = 0.59 (0.42, 0.83)$

$HR_{18mo} = 0.75$

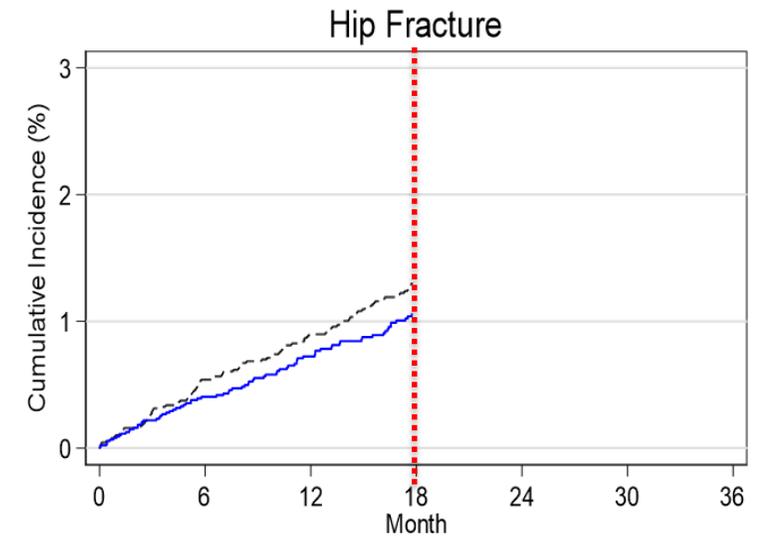
RWE

$HR_{36mo} = ??$

$HR_{18mo} = 0.75 (0.58, 0.97)$



No. at Risk	0	6	12	18	24	30	36
Zoledronic acid	3875	3807	3674	3553	3494	3387	3161
Placebo	3861	3806	3694	3577	3499	3397	3144



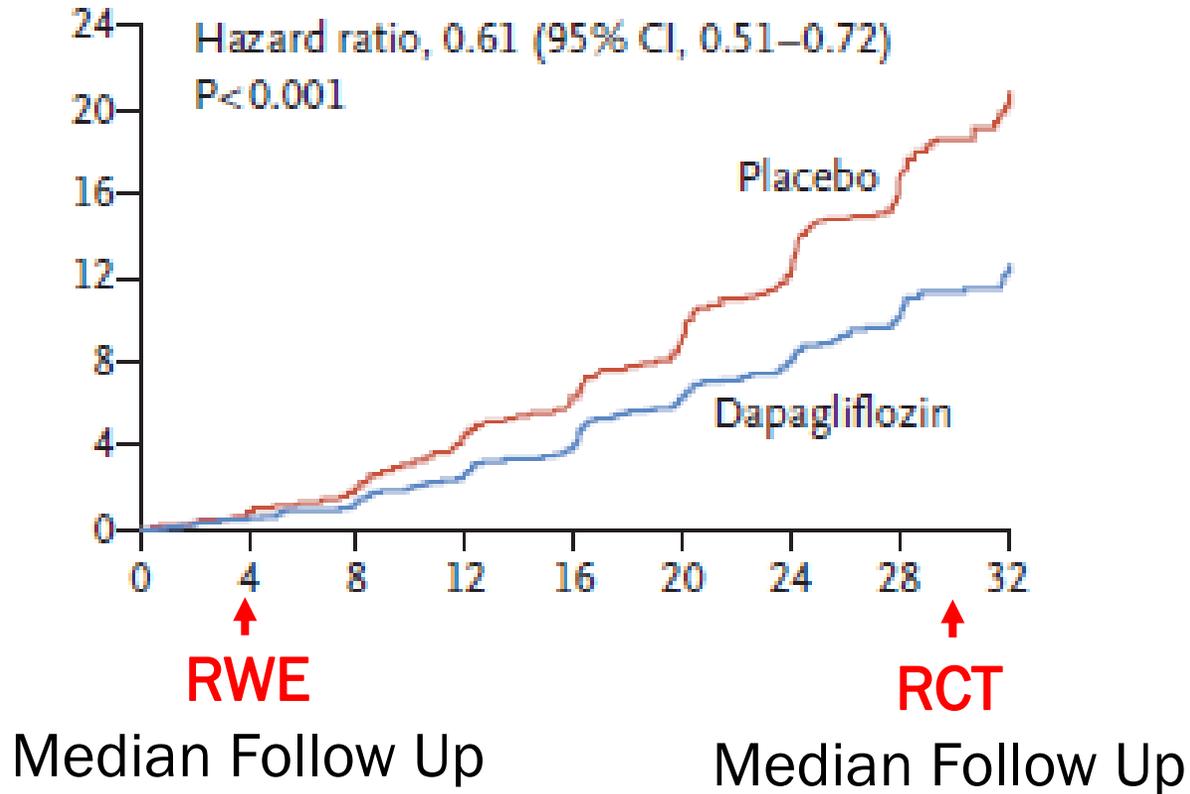
Number at risk	0	6	12	18	24	30	36
Raloxifene	9003	7753	6768	0	0	0	0
Zoledronic acid	9003	7766	6743	0	0	0	0

Emulation Challenges

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Delayed effect with long follow up

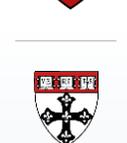
Trial name	Comparator	Endpoint	RCT result	RWE results	Stand. Diff.	Test	Agreement		
DAPA-CKD	Dapagliflozin vs placebo	Sustained decline in eGFR, ESRD, death	0.61 (0.51, 0.72)	0.80 (0.52, 1.26)	-1.10	Sup	-	-	SD



- Good
- Moderate
- Poor

Emulation Challenges

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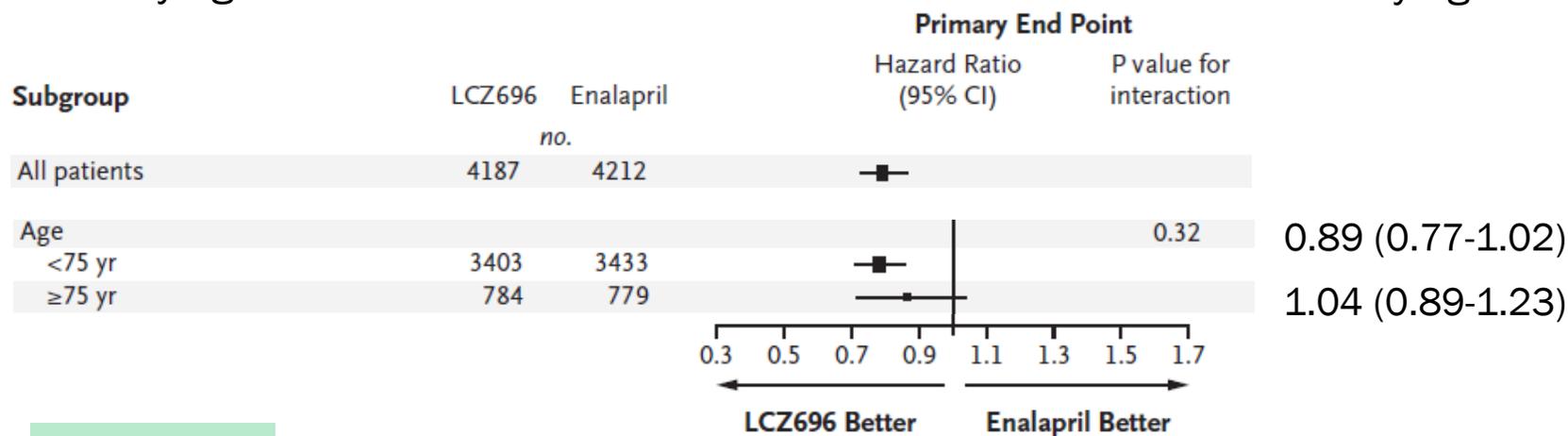
Heart failure: Sacubitril/ Valsartan (Entresto)

Trial name	Comparator emulation	Endpoint emulation ⁺	RCT result	RWE results	Stand. Diff.	Test	Agreement		
PARADIGM-HF	Sacubitril/valsartan vs Enalapril	HHF/CV death	0.80 (0.73, 0.87)	0.97 (0.87-1.08)	-3.42	Sup	-	-	-

Treatment effect reduced in those 75+?

RCT by age:

RWE by age:



Good

Moderate

Poor

Heart failure: Sacubitril/ Valsartan (Entresto)

Trial name	Comparator emulation	Endpoint emulation ⁺	RCT result	RWE results	Stand. Diff.	Test	Agreement		
PARADIGM-HF	Sacubitril/valsartan vs Enalapril	HHF/CV death	0.80 (0.73, 0.87)	0.97 (0.87-1.08)	-3.42	Sup	-	-	-

Original research

Effectiveness of angiotensin-neprilysin inhibitor treatment versus renin-angiotensin system blockade in older adults with heart failure in clinical care

Rishi J Desai ,¹ Elisabetta Paterno,¹ Muthiah Vaduganathan,² Mufaddal Mahesri,¹ Kristyn Chin,¹ Raisa Levin,¹ Scott D Solomon,² Sebastian Schneeweiss¹

0.92 (0.84, 1.00) Initiators of ACE/ARB vs sacubitril/valsartan
0.79 (0.74, 0.85) Switchers from ACE to ARB vs sacubitril/valsartan
0.84 (0.80, 0.89) Combined

Investigating subtle differences in exposure, outcome, inclusion-exclusion criteria, covariates, follow-up

Good

Moderate

Poor

take-home point:

- Important to explore and understand robustness of evidence to reasonable alternative choices

Emulation Challenges

- Inclusion-exclusion emulation
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 - Delayed effect with a long follow-up window
 - Run-in window
 - Discontinuation of maintenance therapy at randomization
 - Robustness
- Run-in on placebo vs run-in on medication under investigation
- Immediate transient effect of discontinuation on outcome



Run-in selects responders to 1 Tx arm + Discontinuation of maintenance therapy → short term ↑ exacerbation

Trial name	Comparator	Endpoint	RCT result	RWE results	Stand. Diff.	Test	Agreement			Indication
P4334	Mometasone furoate/formoterol vs formoterol	Exacerbation	0.56 (0.44, 0.72)	0.78 (0.62-0.97)	-1.95	Sup	RA	-	SD	asthma
D5896	Budesonide + formoterol vs budesonide	Asthma related death, intubation, hosp	1.07 (0.70, 1.65)	1.38 (0.90-2.13)	-0.81	NI	RA	EA	SD	
IMPACT	Fluticasone, umeclidinium, vilanterol vs fluticasone, vilanterol	Exacerbation	0.85 (0.80, 0.90)	1.13 (1.04-1.23)	-5.46	Sup	-	-	-	COPD
POET-COPD	Tiotropium vs salmeterol	Exacerbation	0.83 (0.77, 0.90)	1.02 (0.93-1.12)	-3.27	Sup	-	-	-	
INSPIRE	Advair vs tiotropium	Exacerbation	0.97 (0.84, 1.12)	0.93 (0.90-0.96)	0.56	Sup	RA	EA	SD	

- Good
- Moderate
- Poor

Run-in selects responders to 1 Tx arm +
Discontinuation of maintenance therapy → short term ↑ exacerbation

Conceptual Question: What is the risk of exacerbation with Drug A vs Drug B?

RCT

Operational Question: In *responders to run-in therapy* (Drug A) who are randomized to Drug A vs Drug B **AND** to *simultaneously discontinue* baseline maintenance medication, what is the risk of exacerbation?

RWD

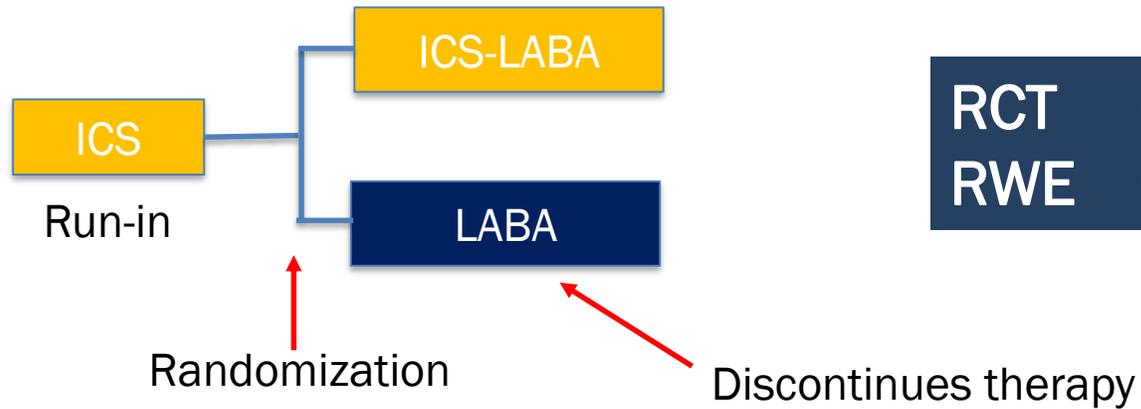
Operational Question: In patients who initiate Drug A vs Drug B (with a washout of X days) **AND** have similar baseline therapy, what is the risk of exacerbation?

take-home point:

Some explanatory design features in trials cannot be emulated with clinical practice data → RCT and RWE study will target different questions

Run-in selects responders to 1 Tx arm

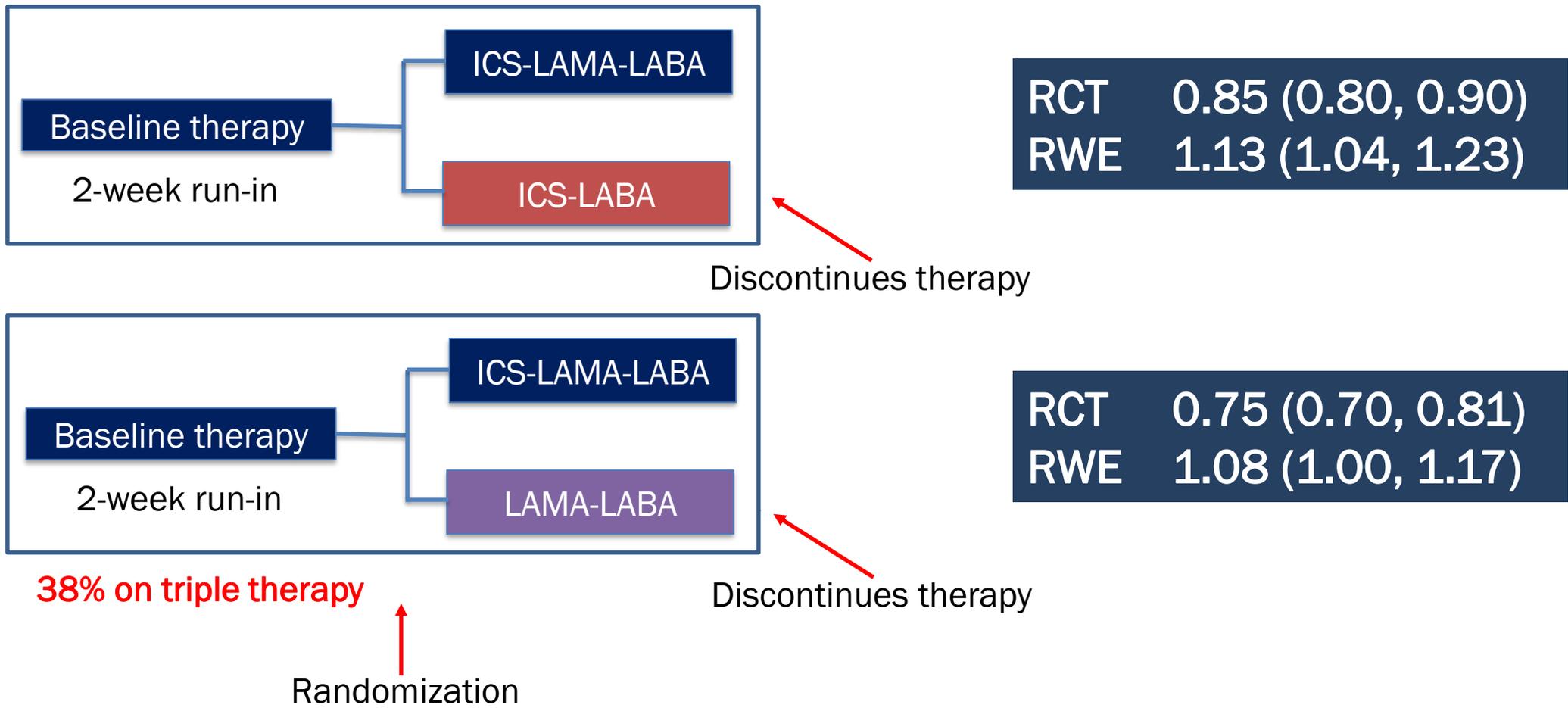
P4334, asthma exacerbation



RCT	0.56 (0.44, 0.72)
RWE	0.89 (0.72, 1.10)

RCT: Discontinuation of maintenance therapy → short term ↑ exacerbation
RWE: Confounding by stage of therapy/disease severity

IMPACT, COPD exacerbation



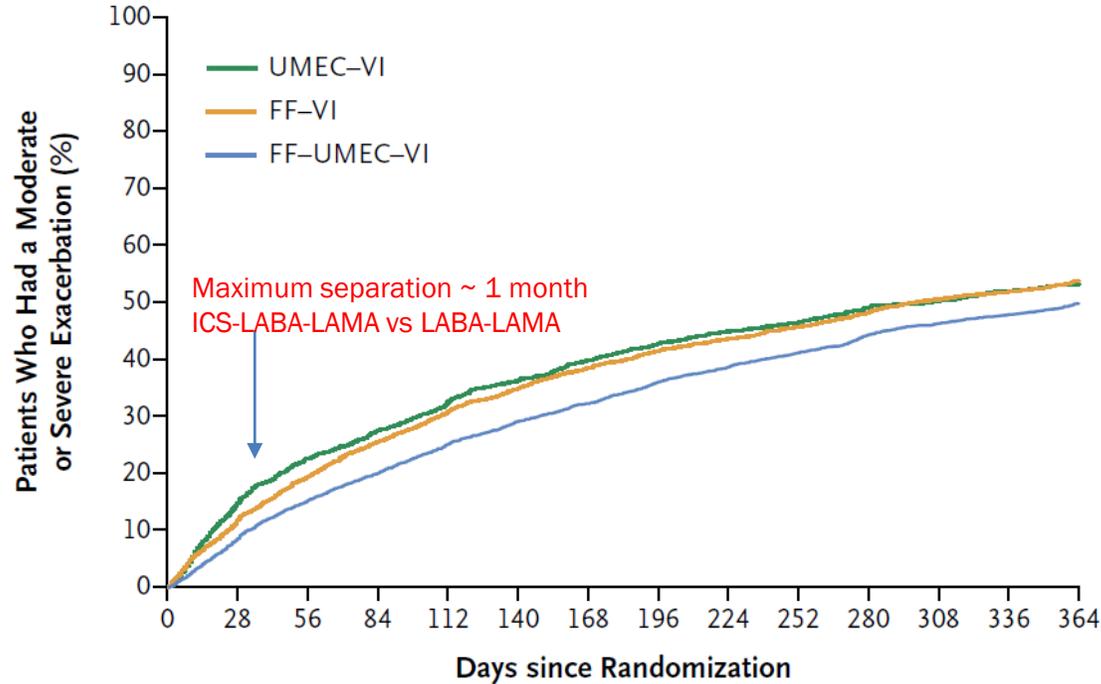
38% on triple therapy

Randomization

Discontinuation of maintenance therapy → short term ↑ exacerbation

IMPACT trial and COPD exacerbation event

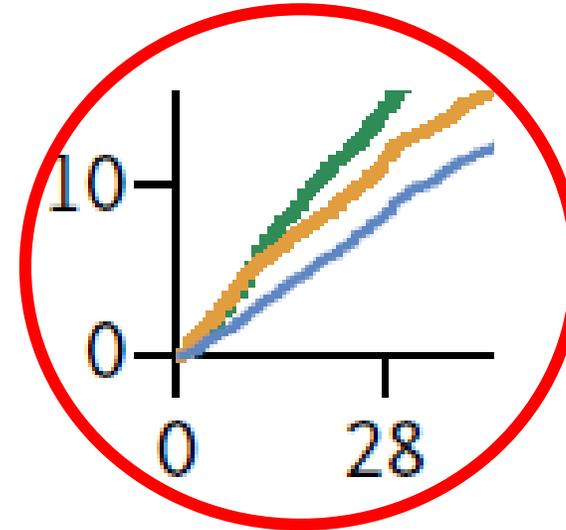
B Time-to-First-Event Analysis



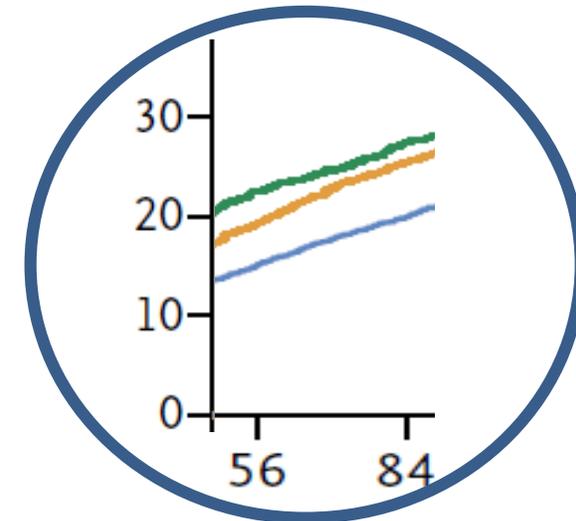
No. at Risk

UMEC-VI	2070	1721	1516	1406	1301	1201	1123	1059	1001	971	917	884	851	642
FF-VI	4134	3554	3133	2838	2620	2410	2250	2120	2004	1823	1823	1729	1671	1228
FF-UMEC-VI	4151	3758	3408	3186	2954	2752	2614	2457	2324	2216	2085	1988	1919	1419

First 30-day interval



Second 30-day interval

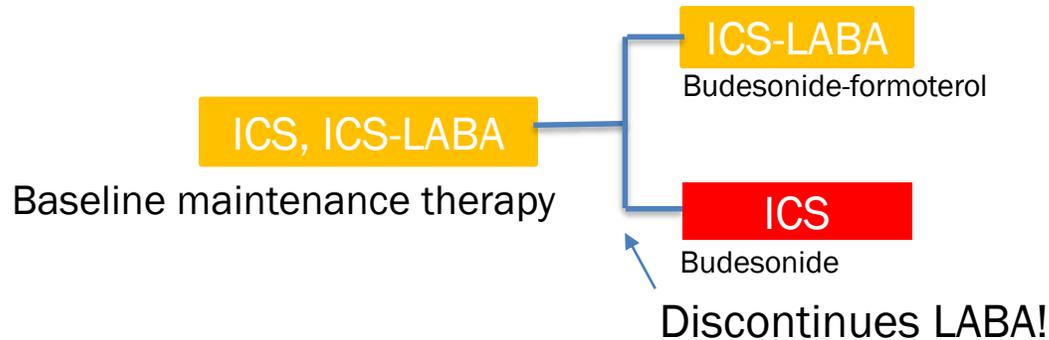


Suissa S, Ariel A. Triple therapy trials in COPD: a precision medicine opportunity. Eur Respir J 2018; 52: 1801848 [<https://doi.org/10.1183/13993003.01848-2018>].



Non-inferiority bound translates to RR 1.32 (upper limit 95% CI <2)

D5896
Treatment: ICS-LABA vs ICS
Outcome: Serious asthma related events



Assumptions Scenario 1:

- Truth is upper bound of non-inferiority limit (1.32)
- 50% of patients were on LABA at baseline
- No effect of discontinuation

		Randomized	
		ICS-LABA	ICS
Baseline	No LABA use	29	22
	LABA use	29	22
		58	44

$RR = 58/44 = 1.32$

Assumptions Scenario 2:

- Truth is upper bound of non-inferiority limit (1.32)
- 50% of patients were on LABA at baseline
- *Discontinuation increases risk of outcome by 50%*

		Randomized	
		ICS-LABA	ICS
Baseline	No LABA use	29	22
	LABA use	29	22+11
		58	55

$RR = 58/55 = 1.05$

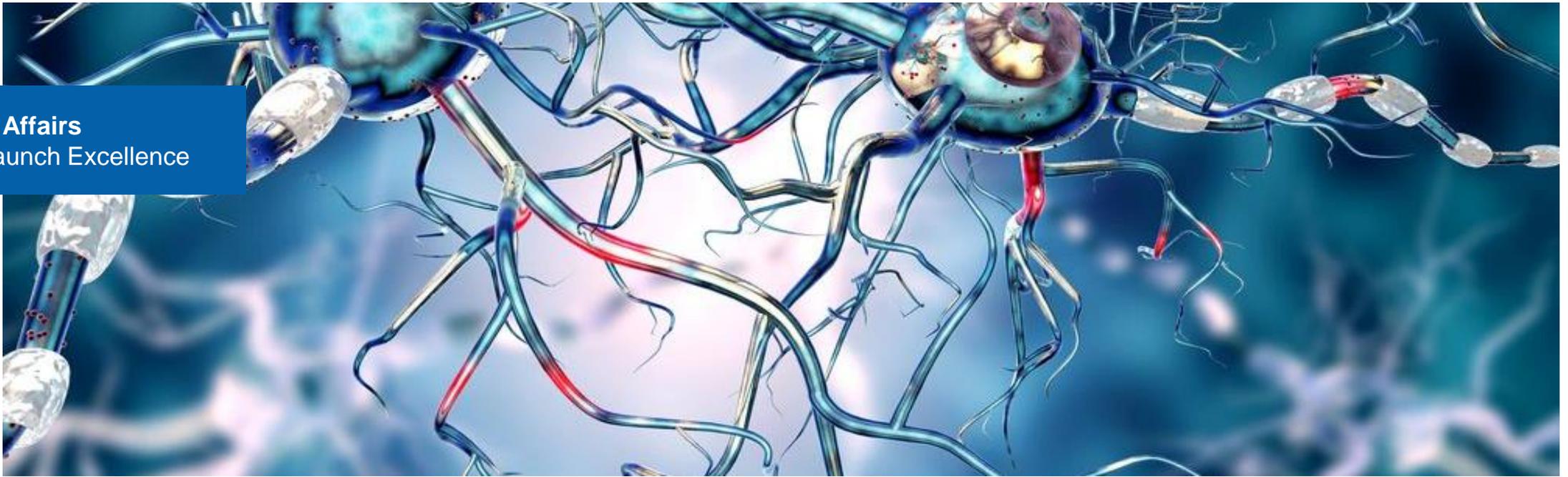
D5896 1.07 (0.70, 1.65)
Pooled RWD 1.38 (0.90, 2.13)

Break

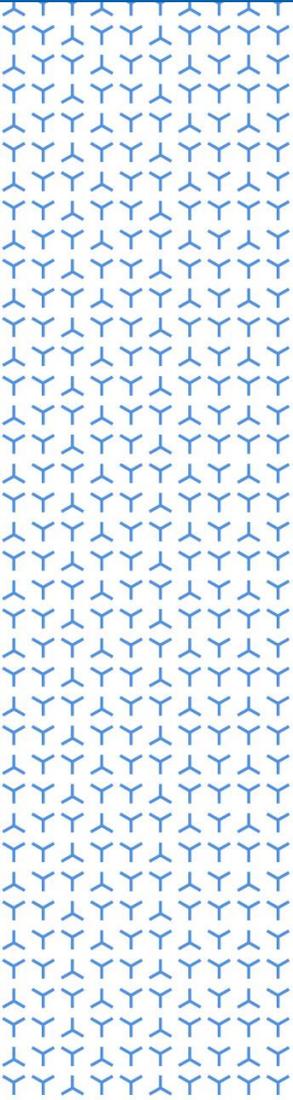
1:05 pm – 1:20 pm

Stakeholder Reactions to Result Findings, and Implications

1:20 pm – 2:25 pm



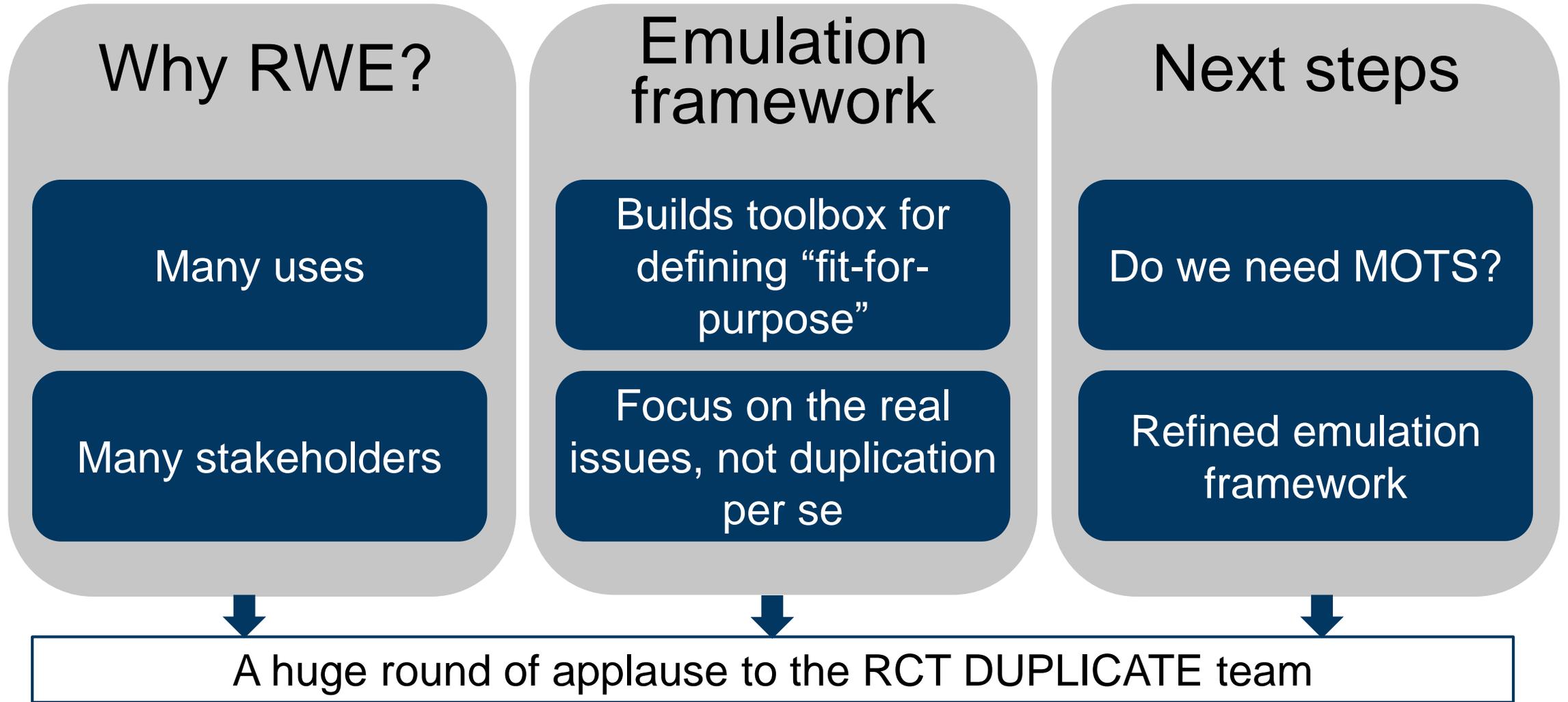
Global Medical Affairs
Evidence and Launch Excellence



Lessons Learned from Trial Replication Analyses: Findings from the DUPLICATE Demonstration Project

Melvin (Skip) Olson, ScD
Head Integrated Evidence Strategy and Innovation
Novartis
May 2022

Reactions to the Lessons Learned



Remarks on the RCT DUPLICATE project

Issa J. Dahabreh

Target trial emulation view

Core methods of a highly pragmatic **target trial** can be **emulated** by observational analysis (except for randomization)

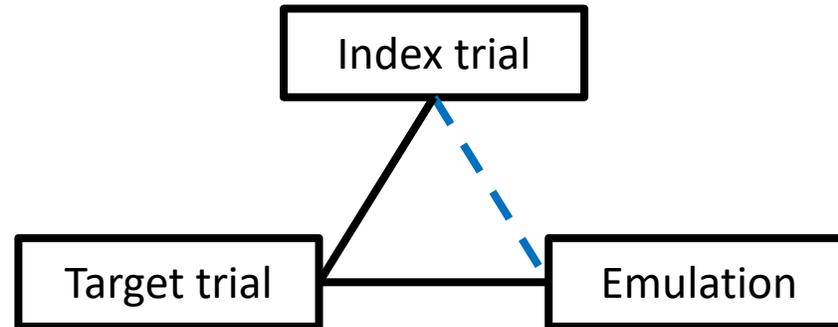
Emulation estimates have a causal interpretation (under assumptions)



Benchmarking view

Target trial methods chosen to be similar to those in a highly pragmatic **index trial**

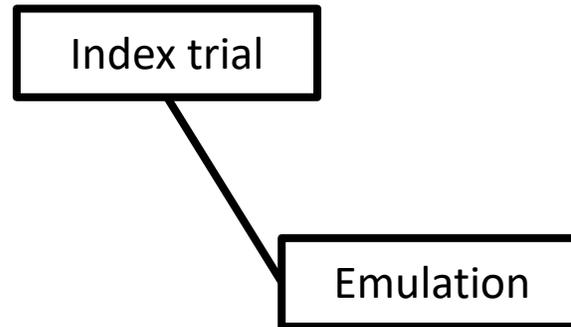
Close **emulation** of **target trial** methods \Rightarrow agreement of **emulation** and **index trial** results (under assumptions)



RCT DUPLICATE view

Emulate **index trials**

Focus on agreement of results between **index trial** and **emulation**



Index trials in RCT DUPLICATE are not pragmatic

Index trial

Index trials sometimes differ from any **target trial** that can be emulated by observational analysis of claims data

Examples:

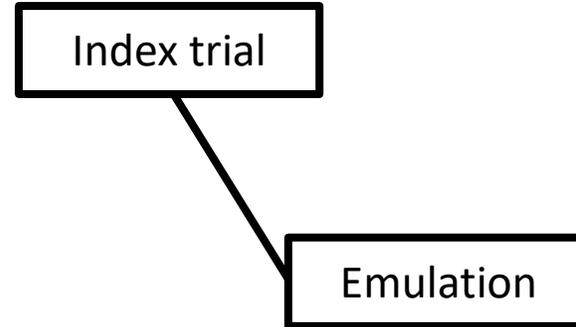
- Placebo control
- Run-in periods

Target trial

Methods chosen to improve results agreement

Examples:

- Placebo emulated by initiation of an active agent
- Censoring on non-adherence, no adjustment for selection bias

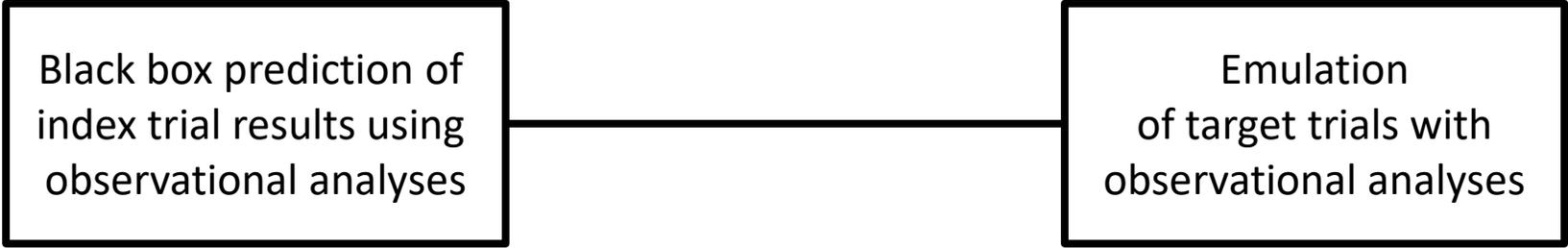


Not “in the spirit” of target trial emulation

Emphasis on predictive performance



Causal – predictive spectrum of comparisons



ATTITUDE:

Study of studies, meta-regression

Causal inference

OBJECT OF STUDY:

Response surface of results, pattern recognition

Causal estimands

SUCCESS:

Good predictive performance

Close emulation of methods \Rightarrow conclusion (estimate) agreement

Practical comparisons live in the *uncomfortable middle* of the spectrum.

Adjournment

Lessons Learned from Trial Replication Analyses: Findings from the DUPLICATE Demonstration Project

May 10, 2022

Thank You!

Contact Us



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dukemargolis@duke.edu



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