Developing Real-World Data ad Evidence to Support Regulatory Decision-Making

National Press Club

529 14th St NW, Washington, DC 20045

October 3, 2019





Welcome and Overview





Welcome and Update from FDA





Emerging Insights into the Development of RWE from Randomized Designs







Real World Evidence <u>with</u> Randomized Clinical Trials

Adrian F. Hernandez, MD, MHS Vice Dean for Clinical Research Duke School of Medicine



What's a problem we're aiming to solve?

~2% ~90%

McHugh, K., Swamy, G., & Hernandez, A. (2018). Journal of Clinical and Translational Science, 2(6), 384-392. doi:10.1017/cts.2019.1

21,000

- Who are these pioneers?
- Why did they agree to participate?

Ideal Experience?





The Pittsburgh Sleep Quality Index (PSQI)

Instructions: The following questions relate to your usual sleep habits during the past month only. Your answers should indicate the most accurate reply for the majority of days and rights in the past month. Please answer all questions. During the past month,

1. When have you causely gone to bed?

2. How long (in minutes) has it taken you to fall askep each night?

3. When have you usually gotten up in the morning?

4. How many hours of actual sloep do you get at night? (This may be different than the number of hours you spend in bedi

Traditional clinical studies feel like work.

 During the past month, how often have you had trouble sleeping because you 	Not during the past month (0)	Less than once a week (1)	Once or byice a week (2)	Three or more times week (3)
a. Cannot get to sleep within 38 minutes	1000			1.000
b. Wake up in the middle of the night or easy morning		1		
c. Have to get up to use the bathroom	1.1	1	2	1
d. Cannot breathe comfortably		1		
e. Cough or show locally		1		-
f. Peel too cold				-
g. Feel too hot		1		
h. Have had dreams		2		
L Have pain		1		
 Other mason(s), please describe, including how often you have had trouble sleeping because of this mason(s): 				
6. During the past month, how often have you taken multicine (prescribed or "over the counter") to help you sleep?				1
During the past month, how often have you had trouble staying avake while driving, eating meak, or engaging in social activity?				
 During the past month, how much of a problem has it been for you to keep up enthusiasm to get things done? 				1
	Very good (0)	Fairly good (1)	Fairly bod (2)	Very bad (3)
During the past month, how would you rate your sleep quality overall?	0.000	1-1-1	1.72	



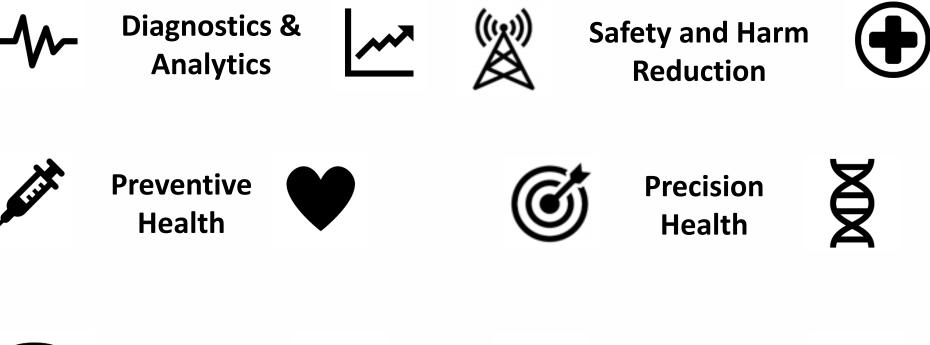
Convenient Flexible Personalized

Yet, people want an experience like this...

Hope for the real world?

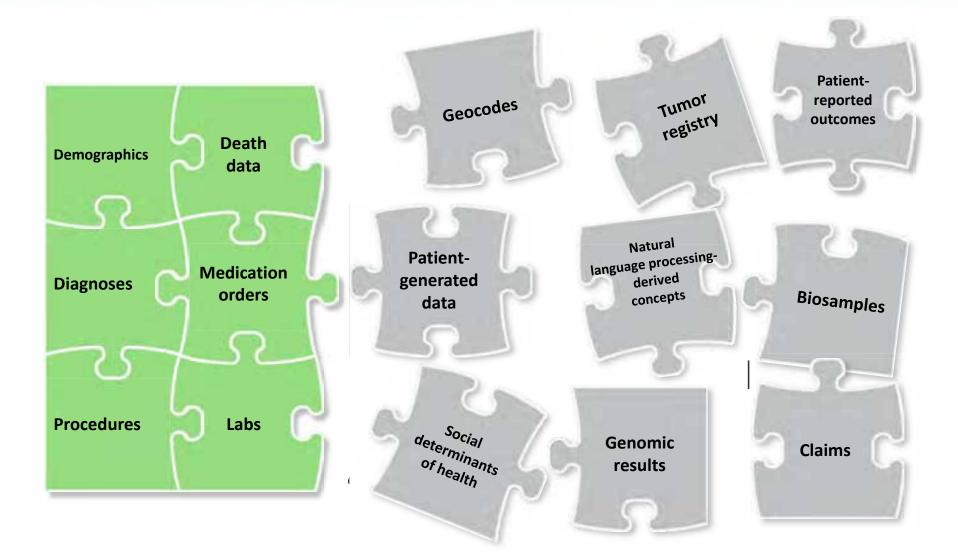


Health Systems Want Better Data





#1 Data Everywhere & Curation



#2 People-Centeredness

Direct to Consumer

- Flexible
- Frictionless
- Fun



Direct to Participant

- Personalized
- Streamlined
- Valuable



#3 mHealth Technology



User-Reported Data

What people say



Task-Based Measures

Measures effort and physiology



Passive Sensing

What people actually do day to day

15

A Real World Example

Looking Back at a Disruptive Technology

EFFECTIVENESS OF INTRAVENOUS THROMBOLYTIC TREATMENT IN ACUTE MYOCARDIAL INFARCTION

GRUPPO ITALIANO PER LO STUDIO DELLA STREPTOCHINASI NELL'INFARTO MIOCARDICO (GISSI)*

In an unblinded trial of intravenous Summary streptokinase (SK) in early acute myocardial infarction, 11 806 patients in one hundred and seventy-six coronary care units were enrolled over 17 months. Patients admitted within 12 h after the onset of symptoms and with no contraindications to SK were randomised to receive SK in addition to usual treatment and complete data were obtained in 11 712. At 21 days overall hospital mortality was 10.7% in SK recipients versus 13% in controls, an 18% reduction (p=0.0002, relative risk 0.81). The extent of the beneficial effect appears to be a function of time from onset of pain to SK infusion (relative risks 0.74, 0.80, 0.87, and 1.19 for the 0-3, 3-6, 6-9, and 9-12 h subgroups). SK seems to be a safe drug for routine administration in acute myocardial infarction.

The Lancet · Saturday 22 February 1986

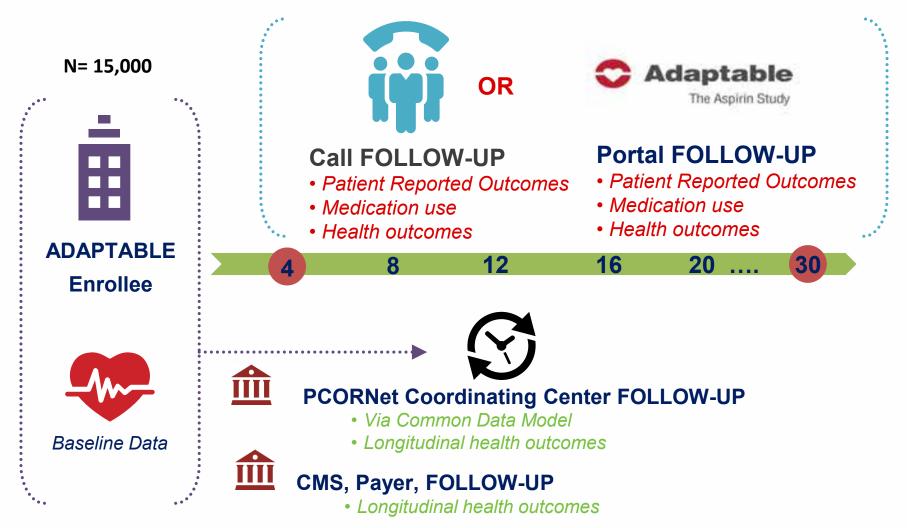


"It started with no funding and skepticism in some quarters but today GISSI is recognized as an Italian achievement that has changed cardiology treatment worldwide."

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ADAPTABLE: What's the Right Dose of Aspirin?

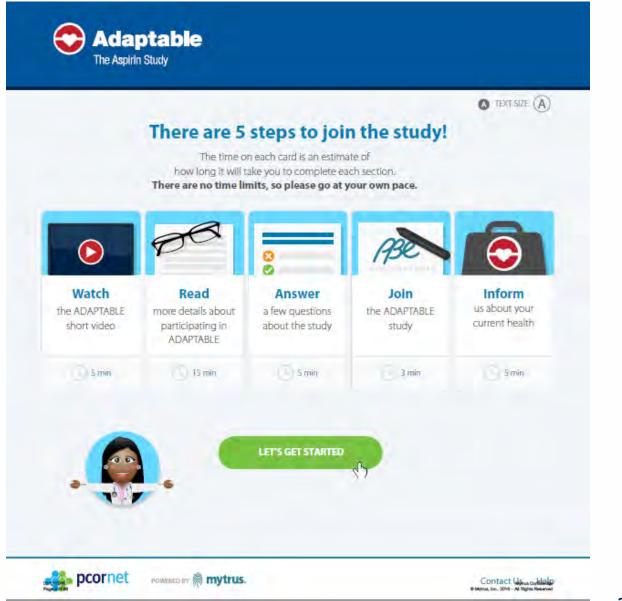
eScreening, eEnrollment and eFollow-up



http://adaptablepatient.com

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The Participant Portal



adaptablepatient.com

Real World Evidence with Clinical Trials Roadmap

Engagement, Electronic Health Data and Embedded Delivery

Pre-study

- Assess sites' use of EHR to facilitate research
- Usability of inclusion and exclusion criteria
- Refine protocol
- •Community interaction profiles with health system
- Feasibility analysis
- •Recruitment plan

Study setup

- Utilize EHR to identify local participants
- •Embed encounter instructions and site content into EHR
- Pre-consent & study specific consent
- Alert clinician
 about trial
- Model outcomes

Recruitment

- E-consent with comprehension questions
- Incorporate screening criteria into EHR for
- Scheduling patients
- Contacting patients
- Recruiting patients
- Alert clinician of patient eligibility
- •EHR Health Portals
- Patient opt in/out for types of studies

Study conduct

- Trials specific data capture from care delivery
- •Auto-populated CRFs fields from EHR
- Extract data to facilitate work of study coordinator
- •Query data to identify events
- •Participant retention and education
- Return of results

Important Matters Quality & Outcomes

What's the Purpose?

Clinical Guidance

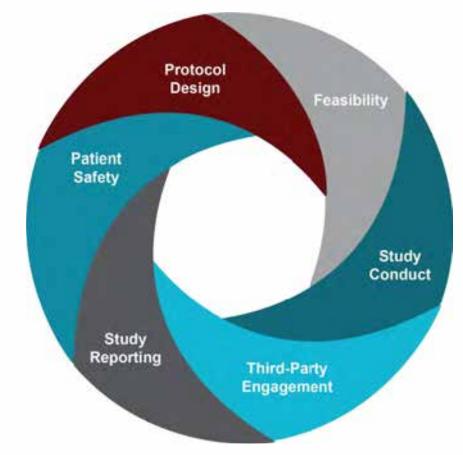
Post Market Commitments

Label Expansions and Revisions

New Drug Approval

Designing to the Purpose

Quality by Design



http://www.ctti-clinicaltrials.org/toolkit/QbD

Making Decisions:

Where do you fall the real world?

Hybrid

Ideal World

- Ideal Population
- Ideal/Perfect Care
- Blinding
- Placebo
- Coordinator Data Collection
- \$\$ is limitless

Real World

- Routine Population
- Usual Care

• Passive data collection

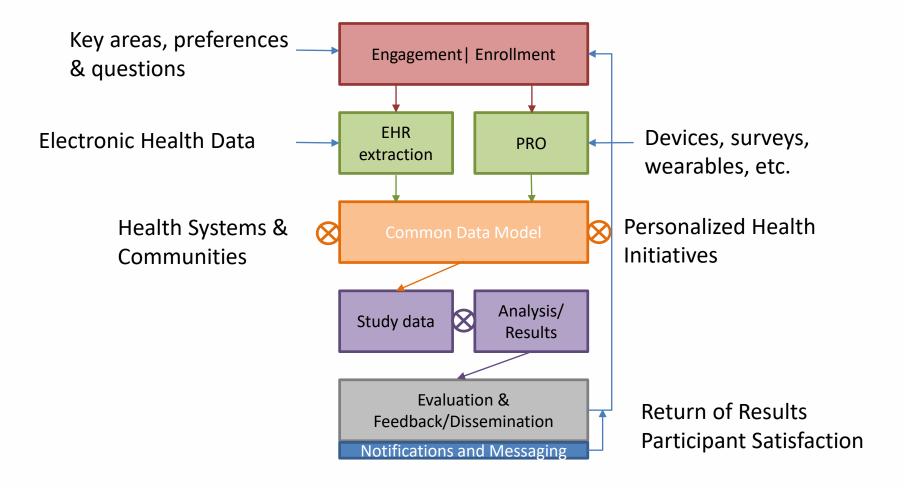
60

 Participant directed data collection

ntrol

\$\$ leveraged with embedded trials

The Puzzle Coming Together?



Participant Alumni Network Clinician Engagement and Rejuvenation

Hernandez AF and Cruz H. Circ 2017

Emerging Real World Evidence

Match Unmet Needs with....

- Advances in curated health records
 - clinical, electronic health records, claims
- Advances in technology
- Advances in capturing digital exhaust
- Advances in phenotyping
- Advances in systems
- Advances in methods...including randomized trials

But to make this work we need... "patient/clinician/system" engagement & trustworthy data

Emerging Insights into the Development of RWE from Randomized Designs







RCTs with Pragmatic Elements – Some Regulatory Considerations

October 3, 2019 Peter Stein, MD Director Office of New Drugs / CDER / FDA

A few comments on pragmatic randomized trials



Pragmatic trials: no standard definition - "explanatory" vs "pragmatic" *approaches* discussed by Schwartz and Lellouch (J Clin Epi 2009): biological assessment vs clinical relevance

- To support a regulatory decision, the issue is the persuasiveness of the findings to provide evidence of efficacy
- Randomization and blinding are **methods** to generate persuasive results
 - Randomization provides balance at treatment initiation
 - Blinding helps assure balance (of monitoring, adherence, endpoint assessment, continuation) after treatment initiation
- The "traditional" trial infrastructure is resource intensive and costly, but
 - Assures a patient population that is well defined, having the target condition
 - Provides careful, regular monitoring for collection of safety information and reliable trial endpoints
 - Has data that is well documented, stable, and traceable from source to results

How pragmatic a trial can be (and provide useful results), depends on the trial's purpose (e.g., regulatory, cost-effectiveness, comparative effectiveness, etc.) and the study question it seeks to answer

Regulatory "objectives": what key questions do we need clinical studies to answer?

- Does the drug *work* for the proposed indication?
 - Causal inference: *substantial evidence of effectiveness*
- Do the drug's benefits (clinical relevance of efficacy in the indicated patients) *outweigh* the drug's risks (expected or potential safety or tolerability concerns) in the indicated population (is it **safe** for use)?
- Can we properly describe the dose/regimen, and the drug's safety profile and risks? (*Sections 2, 5, 6: D&A, W&P, Adverse Reactions*)
- Can we describe the supporting evidence from clinical trials (*Section 14: Clinical Studies*)?

Approvability

Labeling

Pragmatic trials: two definitions and some questions

Pragmatic trials aim to determine **if an intervention works in real-world settings**, so that results can be **generalized to everyday practice** and support decision-making by patients, providers, and health system leaders; contrastingly, explanatory trials aim to determine **if and how an intervention works under well-defined and highly controlled conditions**

Taljaard et al. Trials 2018

Designed for the primary purpose of **informing decision-makers regarding the comparative balance of benefits, burdens and risks** of a biomedical or behavioral health intervention at the individual or population level.

> Califf and Sugarman Clinical Trials 2015

Issues raised:

- Assumes that "traditional" RCTs do not inform everyday practice – that results from such RCTs are not generalizable
 - What is the evidence for this?
 - What underlies differences in results between traditional RCTs and "pragmatic" trials?
- •When can trials with *less* welldefined and *less* well controlled conditions provide useful information?

Drug adherence

FDA

- Patient
 populations
- studied
- Interventions or co-interventions
- Monitoring
- Patient follow-up
- Endpoint
- assessment
- Data quality and reliability

Wide spectrum of potential uses of RWD / RWE in clinical studies

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Randomized Interventional			Interventional non-randomized	Non-randomized / non-interventional		
Traditional Randomized Trial Using RWD Elements		Trials in Clinical Practice Settings			Observational Studies	
RWE to assess enrollment criteria / trial feasibility	eCRF + selected outcomes identified using EHR/claims data	Pragmatic Pragmatic RCT using eCRF (+/-	<i>RCTs</i> Pragmatic RCT using claims and	Single arm study using external	Prospective data collection Registry trials/study Prospective Cohort Study	
RWE to support site selection	Mobile technology used to capture supportive endpoints (e.g., to assess ambulation)	EHR data) A large, simple trial	EHR data	control Itic	Using existing databases Case – Control Retrospective Cohort Study (HC)	

increasing reliance on RWD







Pragmatic randomized clinical trials: an overview of components



How well are the analysis Do the patients actually populations constructed – do **Study population:** have the targeted disease? we understand the impact of entry decision often by participating physician, missing data? How accurate and reliable few exclusions is the endpoint, does it **Recruitment:** patients **Primary analysis:** in practice settings reflect what it purports to usually inclusive reflect? **Primary outcome:** through claims **Setting:** typically or EHR, may use limited eCRF community practices collection; often no required (general or specialty, but How wellprocedures; adjudication can be not usually at referral controlled and implemented (all or some) centers) reliable will patient How well are monitoring and **Organization:** often at sites we detecting Monitoring: may be no or limited evaluation be? not previously involved in protocol-defined requirements: efficacy research, usually limited or follow-up as deemed clinically endpoints and no research infrastructure appropriate safety? Adherence: no specific Intervention: usually not blinded; coefforts to assure higher interventions not usually How much do we care to adherence or to assess standardized/controlled How important is blinding adherence (other than understand the effect if patients in supporting robust through claims for do not take the drug? Is

refills)

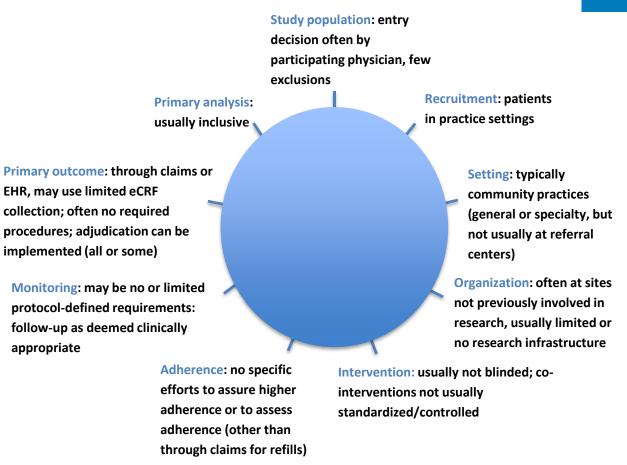
adherence per se an issue?

Based on: The PRagmatic-Explanatory Continuum Indicator Summary 2 (PRECIS-2) wheel BMJ 2015

Increasing use of trials with pragmatic feature(s)

FDA

- Identification of relevant questions for practitioners and patients
- Selection of an intervention *that can be appropriately delivered* in a clinical practice setting
- For studies of approved drugs, streamlined safety data collection
- Integration of clinical data across health care systems to maximize data capture
- If needed, utilize mobile technologies to fill in the gaps, including the capture of patient reported outcomes



Many trials can have 'pragmatic elements' while maintaining rigorous standards for data collection and assessment

Challenges of pragmatic trials



- Design consistent with purpose if supporting regulatory decision-making, pragmatic elements may need to be balanced with elements assuring strong "believability"
- **Broader patient population** but retaining minimum patient enrollment criteria to assure that the indicated population is studied
- Interventions consistent with clinical practice but assuring patients get treatment to be studied (and adherence is evaluated)
- May be unblinded but then need to have objective endpoints, consistent monitoring and balanced co-interventions
- Meaningful endpoints that accurately evaluate study objective whether using an eCRF or using EHR or claims data
- Data that is reliable data (at least some) available for review, to assure accuracy of data, and fidelity of translation from source to analytic datasets
- Patient follow-up sufficient assure that missingness (imbalanced, or informative) isn't confounding results

Emerging Insights into the Development of RWE from Randomized Designs





Session I: Establishing a High-Quality RWD Ecosystem



Join the conversation with **#RWE2019**



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UCSF - Quantum Leap healthcare Collaborative



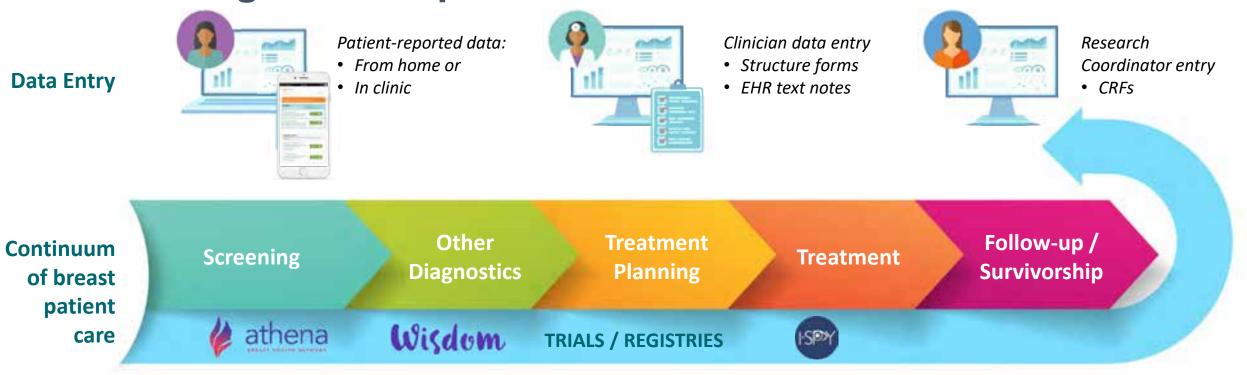
Integrating Clinical Care and Research

Adam Asare, PhD (UCSF, QLHC) Laura Esserman, MD, MBA (UCSF, QLHC) Mitra Rocca, PhD(FDA) Sue Dubman, PhD (QLHC)





VISION: Integrate care process and research





Dashboard / Reports

- Summary dashboard
- Clinician Report
- Patient Report
- Tech Report
- Elevated Risk Report
- Tumor Board Report
- etc.



Services / Referrals

- Trial Matching
- Genetic Counseling
- Social Work
- Nutritionist
- Peer Support
- Behavioral / Sleep
- Psycho-Onc
- etc.

Quality Improvement



Quality improveme



- Other trials, studies
- Registries

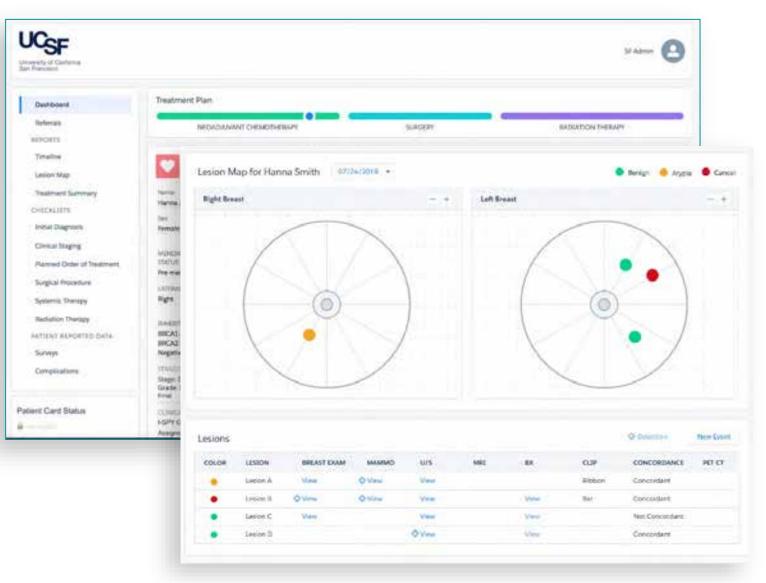






Decision support at point of care

- Centralizes and organizes
 trusted, structured data for
 clinical care,
- Provides for tailored decision support tools not readily supported by EHR systems
- Patients experience streamlined care delivered by empowered teams that are continuously learning and improving.

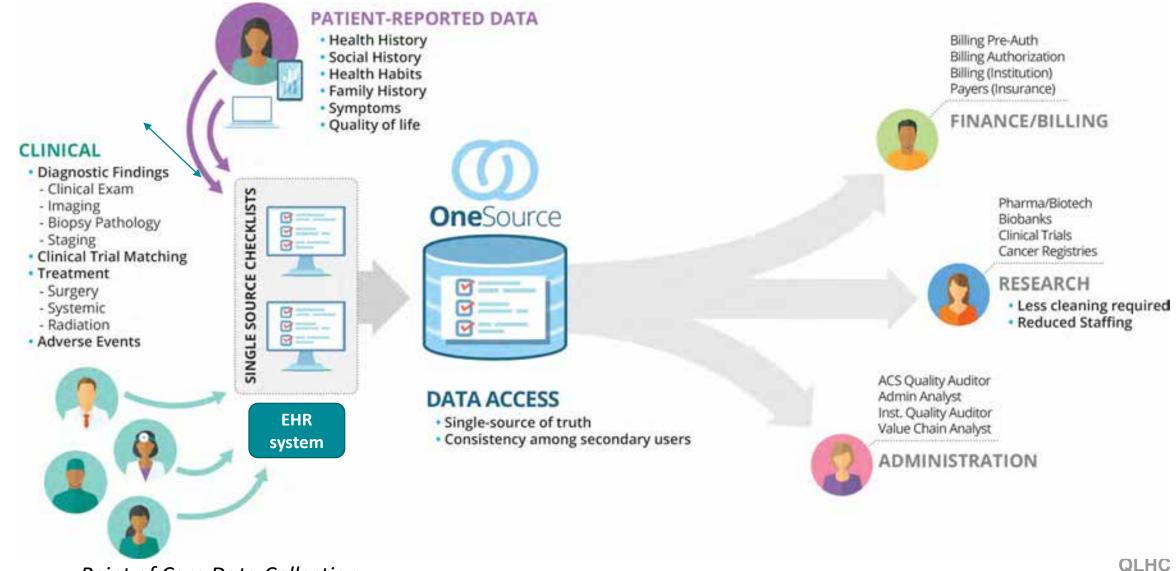




THE ONESOURCE SOLUTION

Structured data as "source"

Enable improvements in technology with changes to clinical workflows

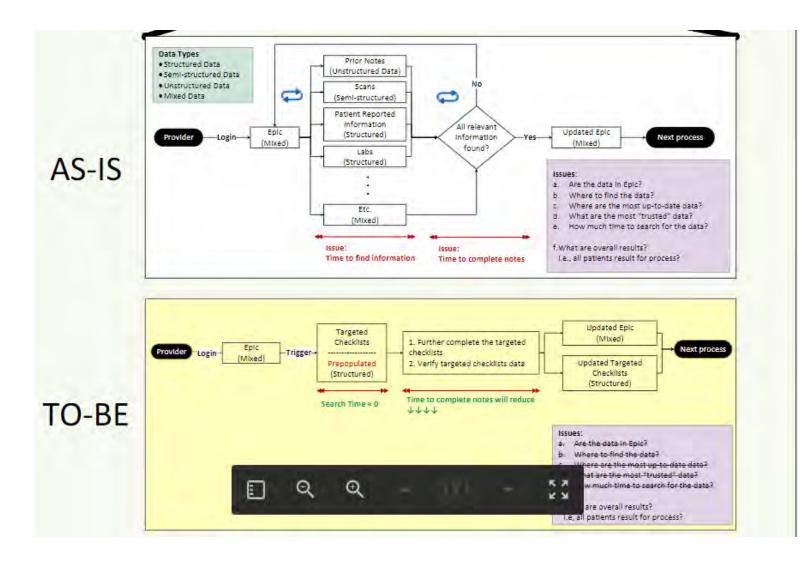


Point of Care Data Collection



Process reengineering

Starting with the AS IS and working towards the TO BE



QLHC⁴²



"Enter Once, Use Many"

View Only

New data



Confirm/Additional Data Added



Supporting clinical trials and data submissions





Standards

Mobile device - Patient Reported **Outcomes, Adverse Event Reporting**



Session I: Establishing a High-Quality RWD Ecosystem



Join the conversation with **#RWE2019**



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Session I: Establishing a High-Quality RWD Ecosystem

Wendy Rubinstein, MD, PhD CancerLinQ / ASCO

Developing Real-World Data and Evidence to Support Regulatory Decision-Making October 3, 2019



ASCO Confidential

CancerLinQ is in a unique position to evaluate interoperability



Organizations have been connected to the CancerLinQ[®] platform

Supported EMRs:

Epic, MOSAIQ, Allscripts, ARIA, CureMD, OncoEMR, Integra Connect, Centricity, NextGen, IntelliDose

1,100,000+

Total number of **patients** with a primary cancer diagnosis in the clinical database

169,000+

Curated records: Lung (NSCLC, SCLC), breast, ovarian, prostate, pancreatic, colorectal, CLL

PRACTICE TYPE DISTRIBUTION (SIGNED)

15% Academic

26%

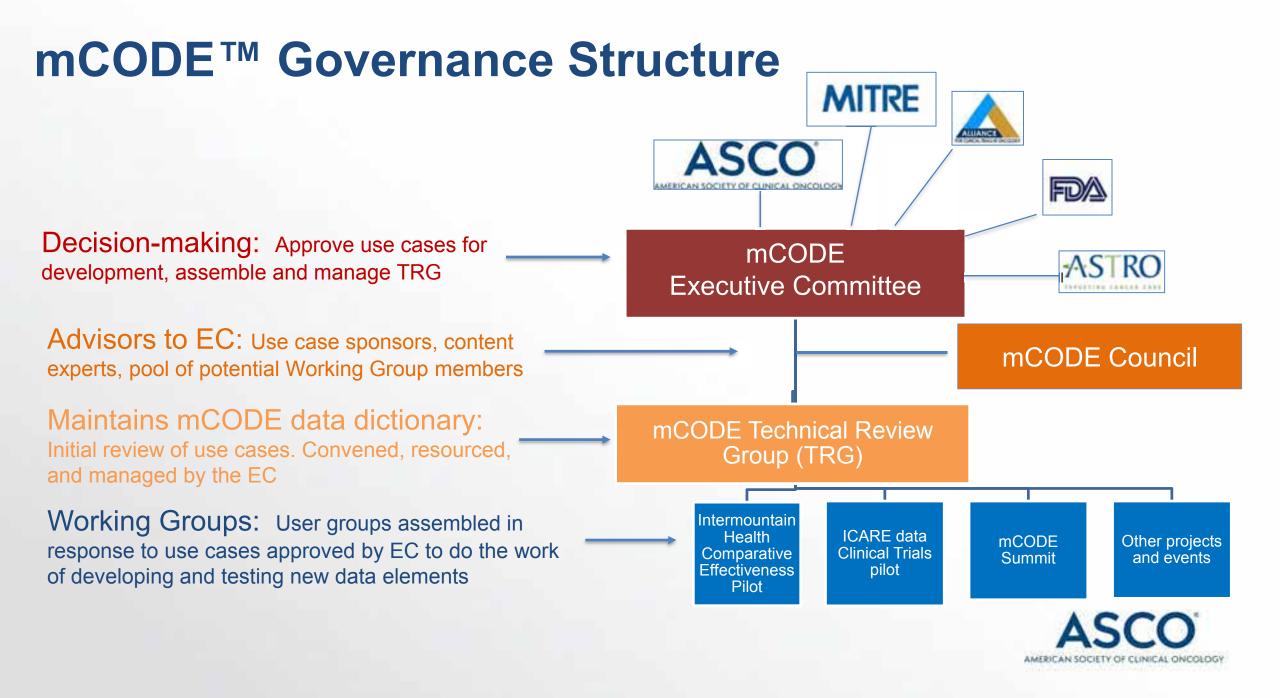
Hospital/Health system

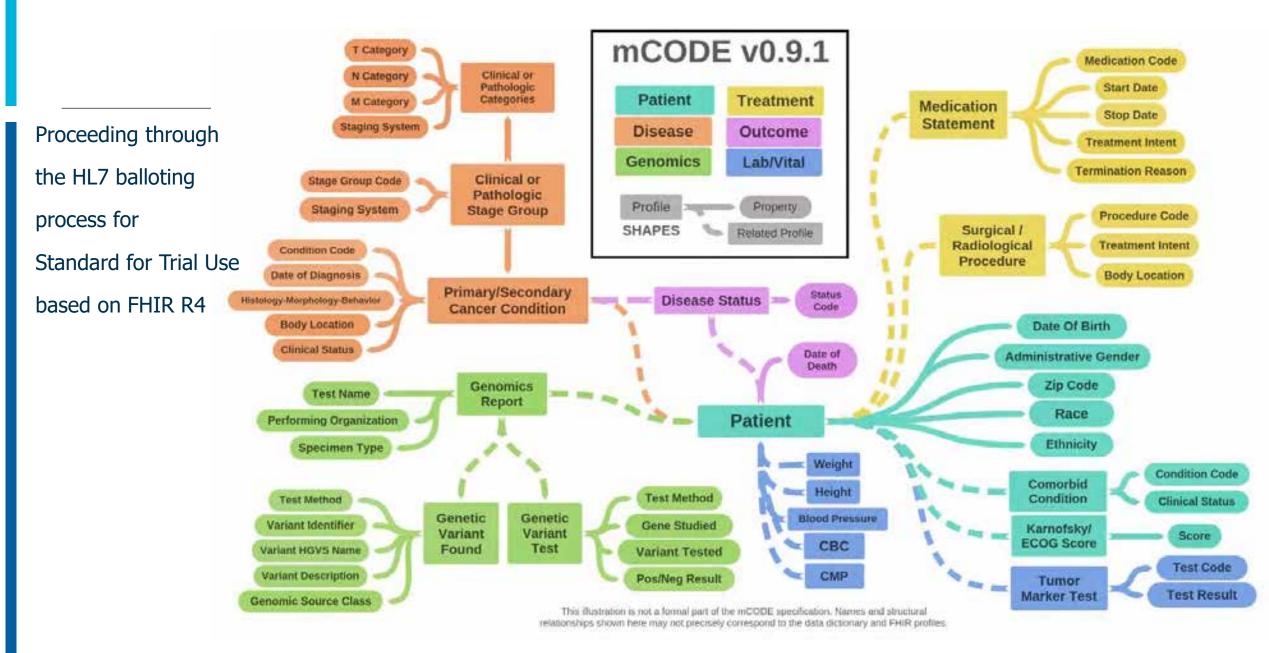
59% Private/Independent

mCODE[™]

Purpose: To develop and maintain standard computable data formats, known as Minimal Common Oncology Data Elements (mCODE), to achieve data interoperability and enable progress in clinical care quality initiatives, clinical research, and healthcare policy development







MITRE

Not for Distribution

Session I: Establishing a High-Quality RWD Ecosystem



Join the conversation with **#RWE2019**



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Session I: Establishing a High-Quality RWD Ecosystem

Nancy Yu

CEO, RDMD

Duke-Margolis: Developing Real-World Data and Evidence to Support Regulatory Decision-Making October 3, 2019

RDMD is a platform that helps to identify patients & generate evidence to enable drug research in rare disease



Research-activated patients



Patient recruitment & engagement

Research e-consent via central IRB protocol

RDMD obtains medical records from any facility

Longitudinal updates to records



Regulatory-ready evidence

Comparator arms based on natural history

Trial qualification based on I/E criteria

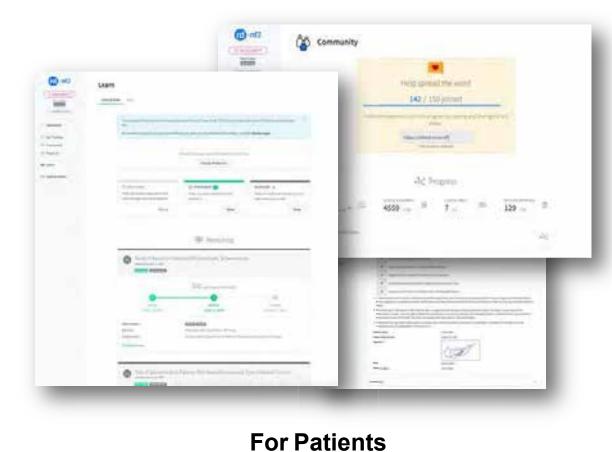
Real-World Evidence on clinical outcomes

Healthcare resource utilization data

We specialize in the unique patient, community, & regulatory needs in **rare disease**



Two-sided software platform for patients & researchers

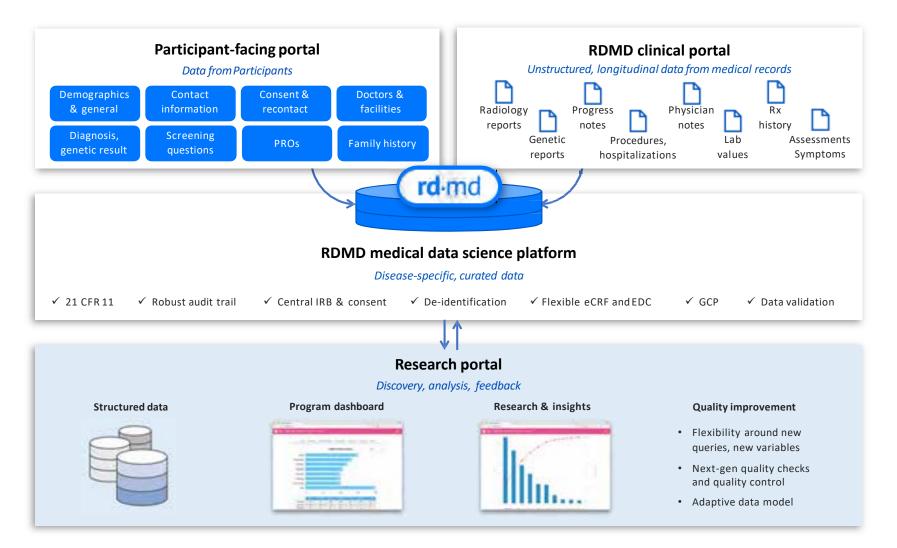




For Life Sciences



The RDMD platform aggregates input from patients & curated data from unstructured medical records





Data management challenges in rare disease

Standard of care is often poorly defined or not broadly adopted

Clinical outcomes assessments may 1) not be used, 2) anecdotally used, or 3) inconsistently / subjectively recorded

Limited overall understanding of conditions to interpret complex clinical data

Curated data is not equal to standardized data

Dispersed populations requires data from disparate EHRs

Variability in analyzing data across different sites

Incomplete data used to inform endpoint validation

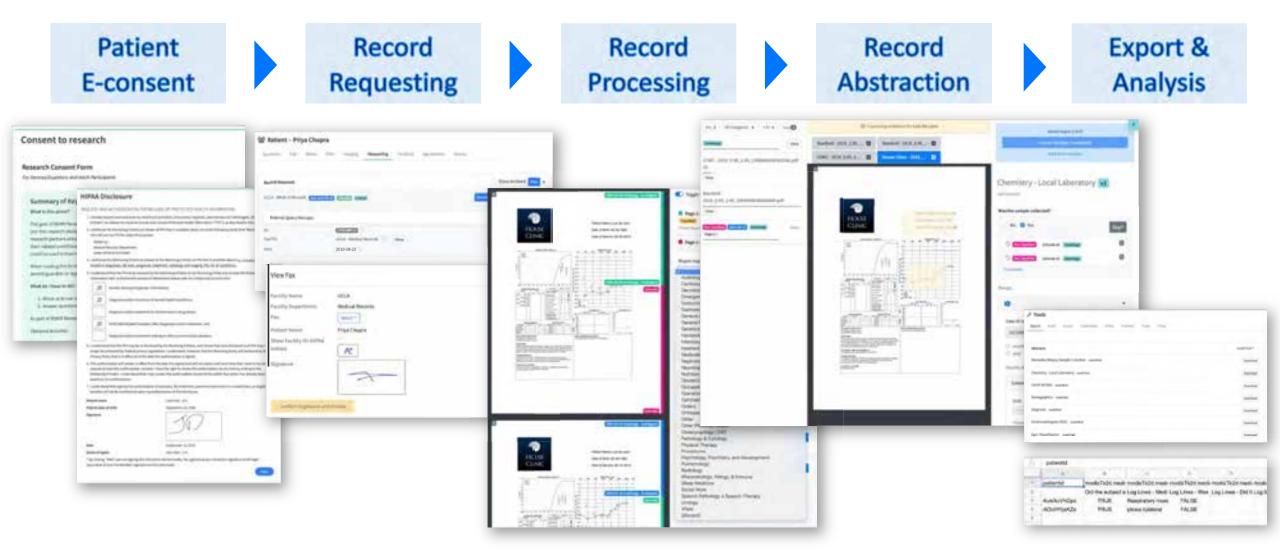
Difficulty in developing standard policies & procedures

Ensuring harmonization with existing standards is not always pragmatic

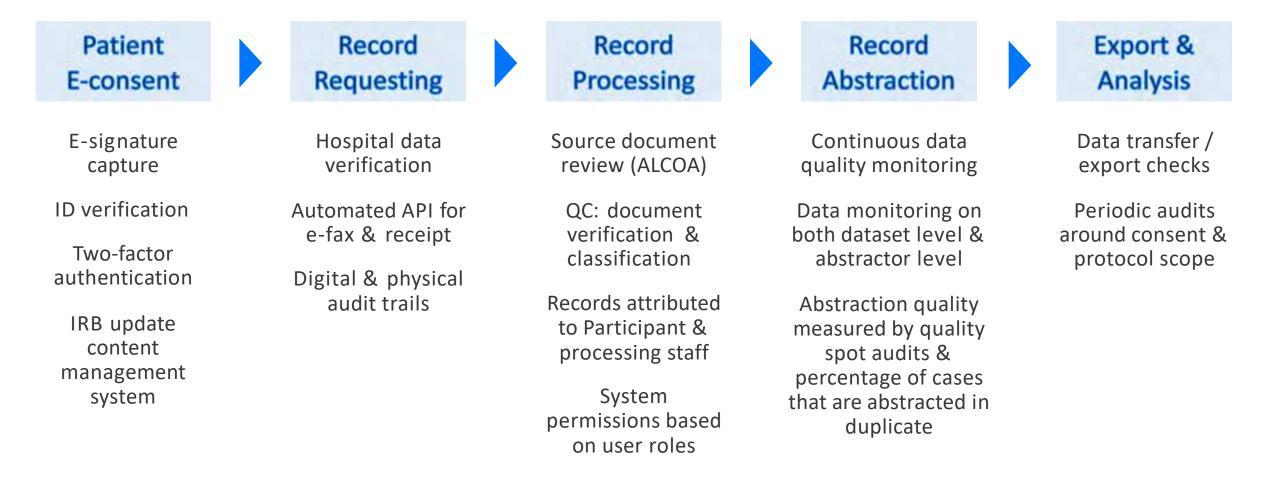
Rigorous standards development & quality control needed



Our technology platform enables end-to-end Data Quality Control & Data Relevancy



Data Quality Control: Technology, processes, training



Data Quality Control: Data abstraction conducted under a central research protocol

Trained abstractors

Trained abstractors with clinical research or nurse practitioner backgrounds

RDMD technology platform

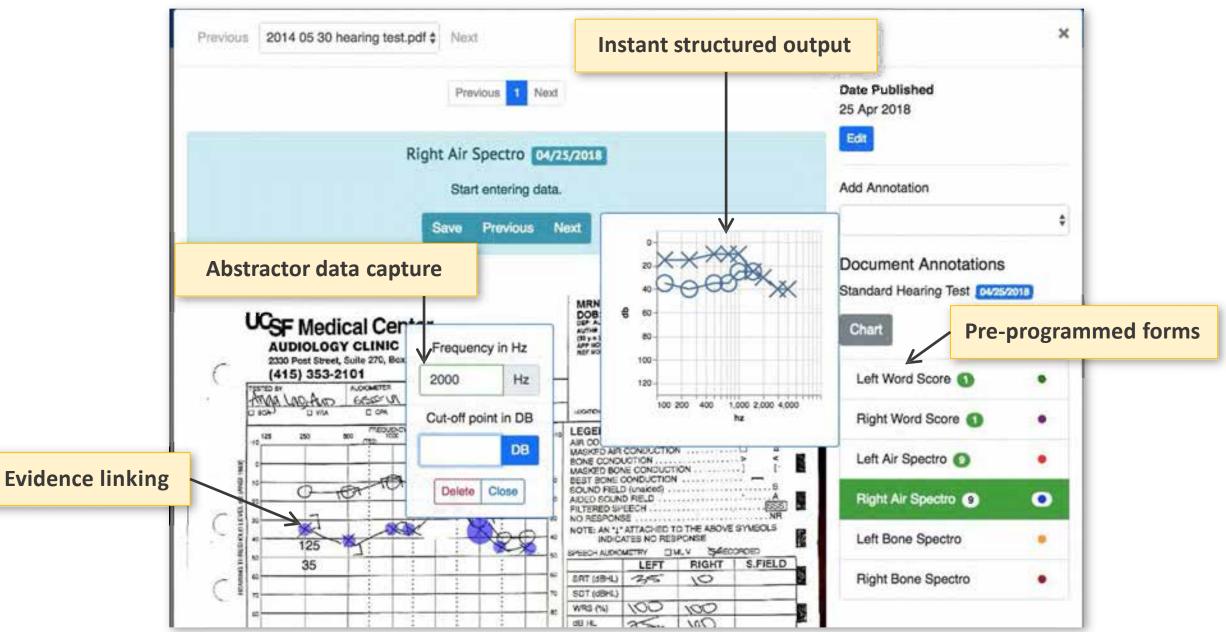
Software enables effective document review & data capture in predetermined forms

RDMD centralized research protocol

Umbrella research protocol & patient informed consent form allows for:

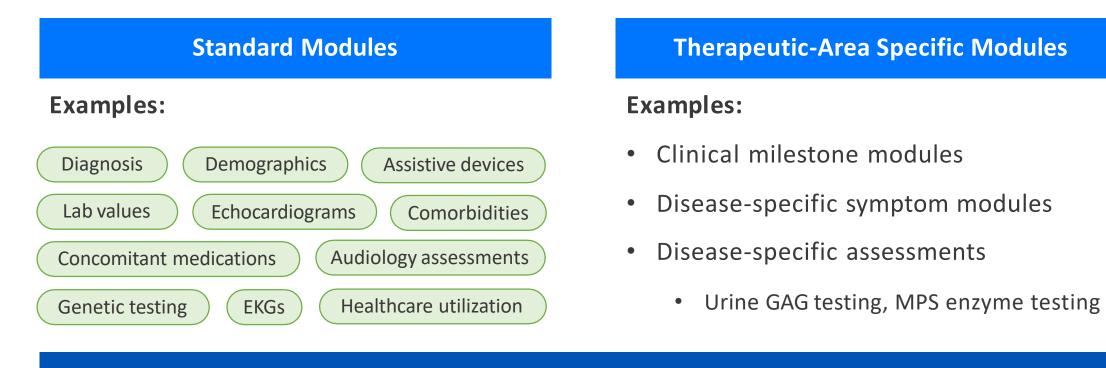
- Flexible / adaptive data capture protocols
- Broad research use on de-identified prospective & retrospective data
- Patient recontact for future studies
- Data analysis across diseases







Data Relevancy: Growing clinical module library maps to industry standards



Maps to / Conforms with

• MedDRA, WHODrug, CDISC, NINDS, GRDR, SNOMED, relevant trial protocols, literature

Data Relevancy: High confidence in real-world data requires triangulation of multiple data sources

High Confidence

Original source documents

available

Medium Confidence

Physician confirms endpoints in note, but source documents unavailable

Low Confidence

Endpoints briefly referenced in physician note; source documents unavailable

Patient Case Otitis media & hearing loss documented in 44 ENT notes, 9 audiograms, & referenced extensively in physician notes

Urine GAG results **copied into note** but original report unavailable Physician noted that patient had a "sleep study available for review showing AHI obstructive of 5," **but the study was not referenced again** & polysomnography report unavailable

Ideal; include data: Tag all mentions of the variable to allow for a robust audit trail

Acceptable; include data: Tag all mentions of variable; contact patient / institution to track down source if needed Likely unacceptable; flagged: Patient may be contacted to confirm all institutions



Data Relevancy: Patients are key partners in data quality & completeness

Minimize missing data

Recontact for follow-ups & future studies

Patients respond with key information, verifications, & critical documents

Patients are informed about future research opportunities

FDA: Rare Diseases: Natural History Studies for Drug Development Guidance for Industry

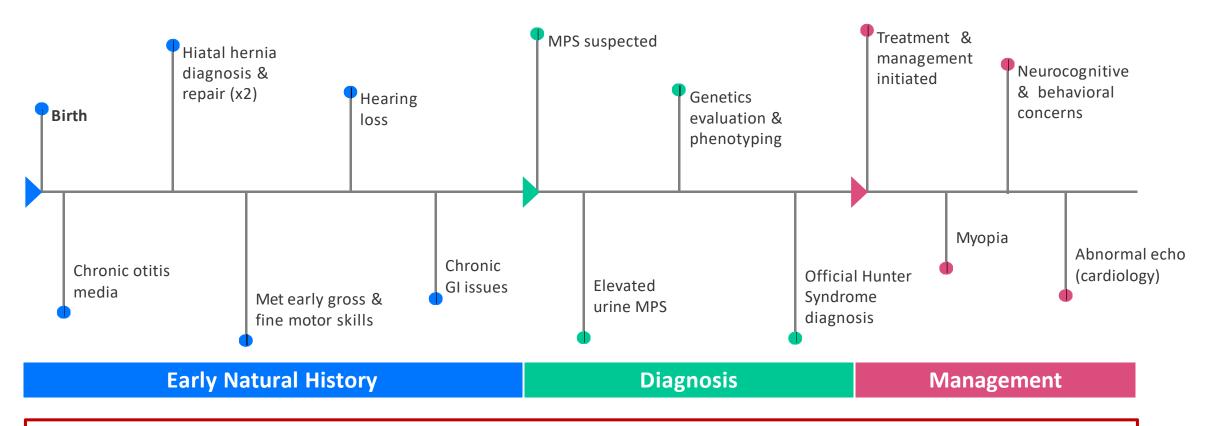
"Patients' continuing study participation ensures the robustness of follow-up data"



Appendix: Participant case study



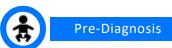
Understanding early natural history, diagnosis, & management outcomes in rare is **complex**, requiring analysis of multiple sources of clinical data



Hunter Syndrome (MPS II) Case Study

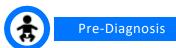
What sources of data can we use to build out the typical patient journey in a rare condition?

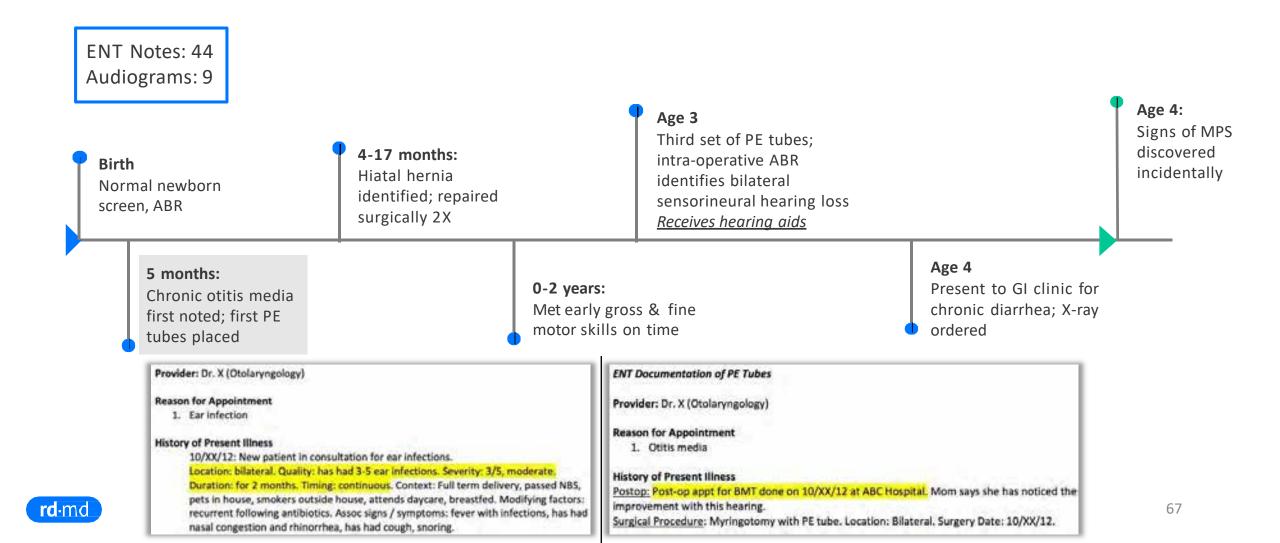




rd

Birth Normal newborn screen, ABR	Newborn Screening Results Date received: 2//00/2012 Date Reported: 2//00/2012 SEX: Male Feed: Breastmilk only Status: NORMAL NORMAL SCREEN Disorder Screening Result Amino Acid Disorders Normal Fatty Acid Disorders Normal Galactosemia Normal Biotinidase Deficiency Normal Hypothyroidism Normal Hemoglobinopathies Normal Cystic Fibrosis Normal	Age 3 Third set of PE tubes; intra-operative ABR identifies bilateral sensorineural hearing loss <u>Receives hearing aids</u>	Age 4: Signs of MPS discovered incidentally
 5 months: Chronic otitis media first noted; first PE tubes placed 		0-2 years:PreMet early gross & finechr	esent to GI clinic for ronic diarrhea; X-ray dered
ABR Newborn Hearing ABR Newborn He Institution: ABC N Name: XXXXX XXX DOB: XX-FEB-2012	aring Screening Results Iedical Center XXXX	Report XX-Feb-2012	
-md Gender: M	Last Results:	Left: Pass 35 dB nHL Right: Pass 35 dB nHL	66

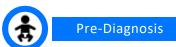


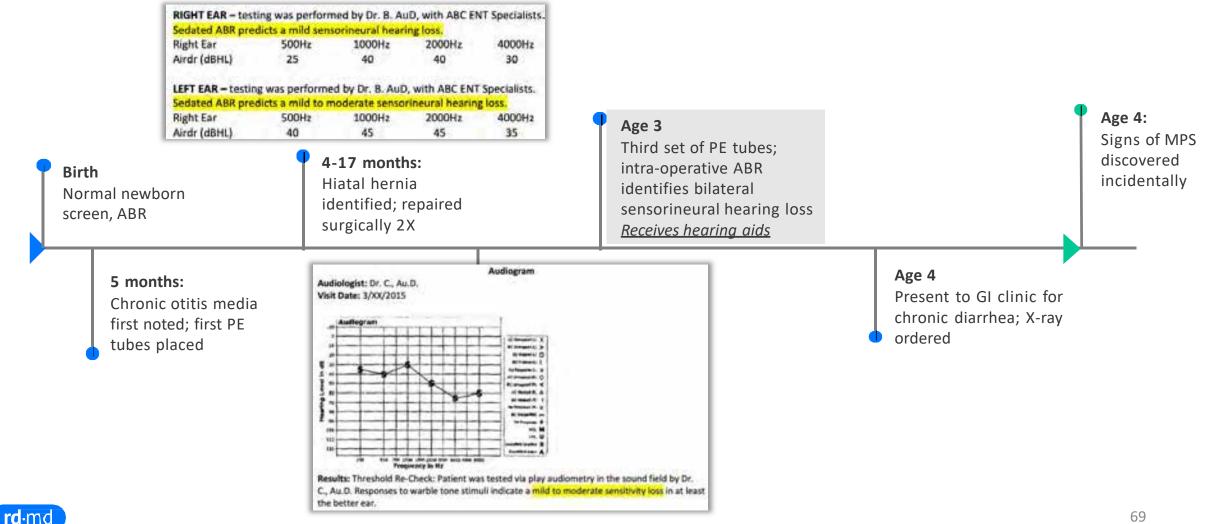


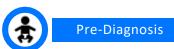


rd

ilar ring	9	Age 3		Age 4:
4-17 months: Hiatal hernia identified; repaired surgically 2X		Third set of PE tubes; intra-operative ABR identifies bilateral sensorineural hearing loss <u>Receives hearing aids</u>		Signs of MPS discovered incidentally
	Met early gross		Age 4 Present to GI clinic for chronic diarrhea; X-ray ordered	
CHARGE SUMMARY	Collecter	ng Physician: Dr. A (Pathologist) d Date: 7/XX/2013 is		
	4-17 months: Hiatal hernia identified; repaired surgically 2X	4-17 months: Hiatal hernia identified; repaired surgically 2X 0-2 years: Met early gros motor skills or CHARGE SUMMARY Attendir Collecte Diagnos	Age 3 4-17 months: Hiatal hernia identified; repaired surgically 2X 0-2 years: Met early gross & fine motor skills on time SURGICAL PATHOLOG CHARGE SUMMARY Hatending Physician: Dr. A (Pathologist) Collected Date: 7/XX/2013 Diagnosis	Age 3 Third set of PE tubes; intra-operative ABR identified; repaired surgically 2X O-2 years: Met early gross & fine motor skills on time SURGICAL PATHOLOGY REPORT CHARGE SUMMARY Age 3 Third set of PE tubes; intra-operative ABR identifies bilateral sensorineural hearing loss Receives hearing aids Age 4 Present to GI clinic for chronic diarrhea; X-ray ordered SURGICAL PATHOLOGY REPORT Attending Physician: Dr. A (Pathologist) Collected Date: 7/XX/2013 Diagnosis



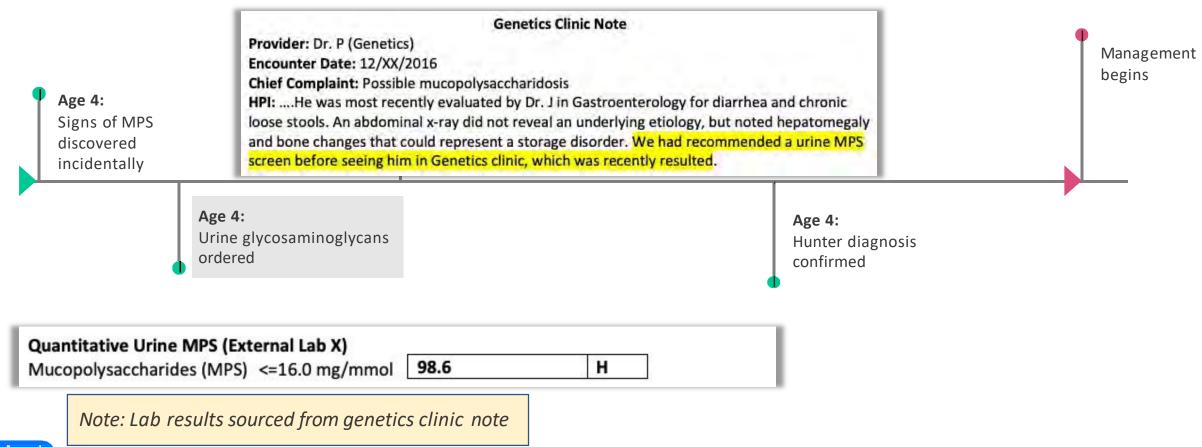




• Birth Normal newborn screen, ABR	XR Abdomen 1 Date: 11/XX/2016 Resulted by: Dr. K (Radiologist) CLINICAL HISTORY: Reason for Exam: Evaluate for constipation Clinical Signs and Symptoms: Loose stools with suspected constipation COMPARISON: None		Age 4: Signs of MPS discovered incidentally
5 months: Chronic otitis medi first noted; first PE tubes placed	FINDINGS Catheters / tubes / postoperative changes: None Bowel: Normal bowel gas pattern Soft tissues: The liver appears prominent, and clinical correlation is advised. The configuration of the pelvis and the ribs raises the possibility of an underlying storage disease such as mucopolysaccharidosis. Lung bases: Clear Bones: Lack of complete posterior spinal fusion at the L5 level is a finding of uncertain clinical significance. IMPRESSION: No evidence of excessive stool burden. The bones raise the possibility of an underlying storage disease. Probable hepatomegaly.	Age 4 Present to GI clinic for chronic diarrhea; X-ray ordered	



Clinical, radiological, and laboratory data can help answer key questions about a patient's diagnostic odyssey



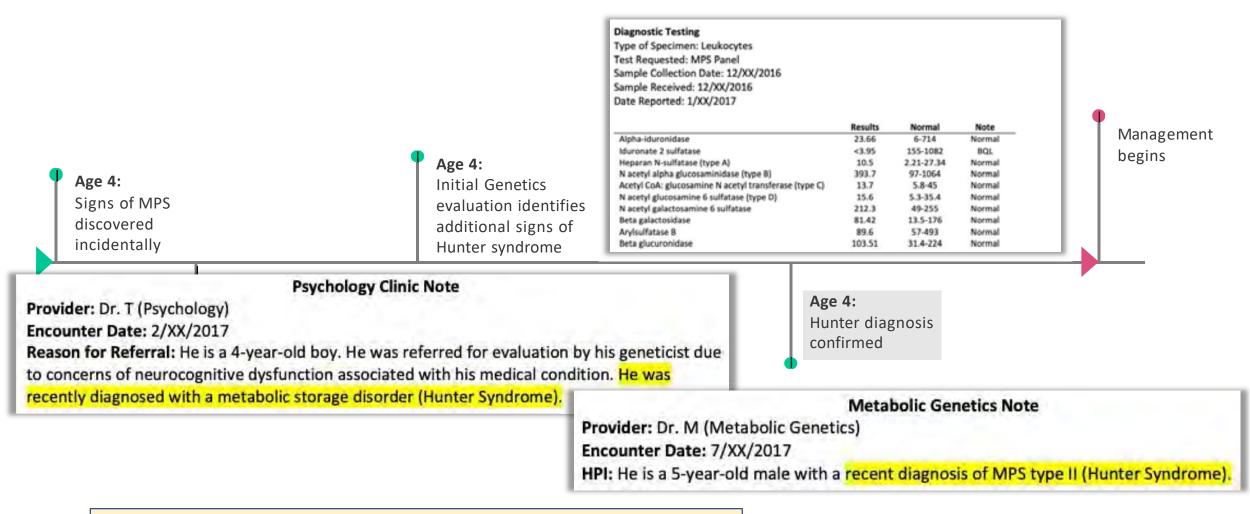


Clinical, radiological, and laboratory data can help answer key questions about a patient's diagnostic odyssey

Age 4: Signs of MPS discovered incidentally	Age 4: Initial Genetics evaluation identifies additional signs of Hunter syndrome	Genetics Clinic Note Provider: Dr. P (Genetics) Encounter Date: 12/XX/2016 Chief Complaint: Possible mucopolysaccharidosis Physical Examination: General: Awake, alert, no acute distress. HEENT: Coarse facial appearance with midface hypoplasia, deep philtrum, broad eyebrows. Pupils are equal and reactive to light. No corneal clouding appreciated. Mouth normal, dentition and oropharynx clear. Neck: Supple Chest: Normal in shape and configuration. Clear to auscultation bilaterally. CVS: Regular in rate and rhythm. No murmurs, rubs or gallops appreciated on auscultation. Abdomen: Soft, non-tender. Mild hepatomegaly, palpable about 2-3 cm below the costal
Age 4: Urine gly ordered	cosaminoglycans	margin. No splenomegaly appreciated. Mild umbilical hernia. <u>GU</u> : Normal male genitalia <u>Back</u> : Intact <u>Extremities</u> : Flexion contractures of the hands. Tapered, almost trident appearance of fingers and hands. All digits intact. Warm and well perfused, with brisk capillary refill. Decreased rang of motion shoulders.
media, bilateral sensor urine mucopolysacchar disorder, most likely a Based on his features ar Scheie) or MPS II (Hunte	is a 4-year-old male with a history of speech ineural hearing loss, hepatosplenomegaly, co ides and x-ray results that are consistent with form of mucopolysaccharidosis (MPS). and medical history, we feel that he most likely er Syndrome), both of which have ERT available has without additional enzymatic testing.	h a lysosomal storage has MPS I (Hurler, Hurler-

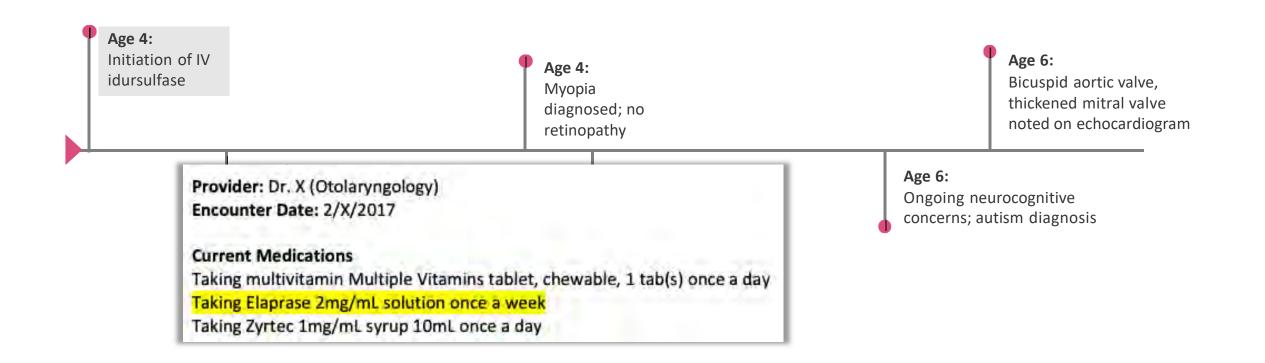


Clinical, radiological, and laboratory data can help answer key questions about a patient's diagnostic odyssey

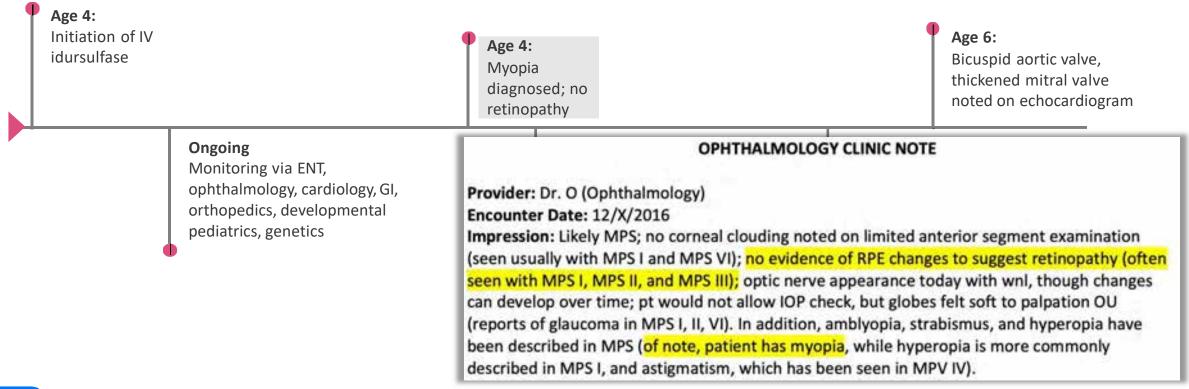


rd·md

Analysis of the post-diagnostic journey allows for tracking of long-term outcomes



Analysis of the post-diagnostic journey allows for tracking of long-term outcomes



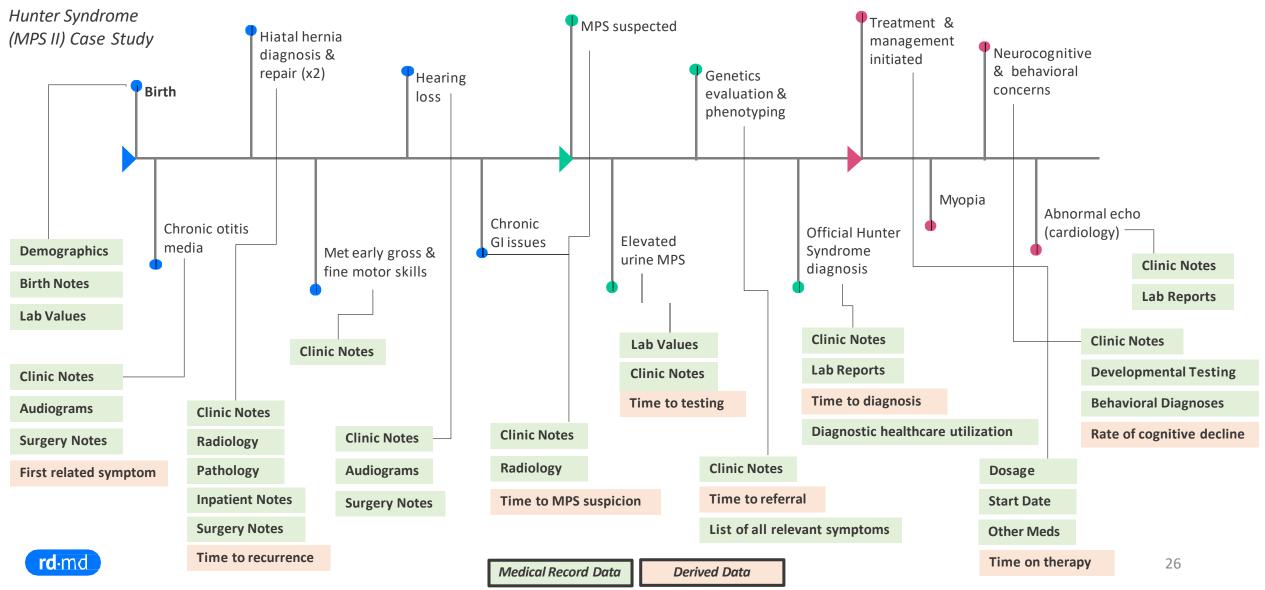


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Analysis of the post-diagnostic journey allows for tracking of long-term outcomes

		Date of Assessm	formed by: Dr. T (Neuropsychology) ent: February 2017 ool and Primary Scale of Intelligenc	e- 4 th Edit	tion			
P Age 4:		Full Scale IQ Verbal Comprehen Visual Spatial Com Fluid Reasoning Co	ision Composite posite	55 101 99 97 100	53 47 42 50	Assessment performed by: Dr. T (Neuropsych Date of Assessment: February 2018 Wechsler Preschool and Primary Scale of Inte		dition
Initiation of IN idursulfase	/		Age 4: Myopia diagnosed; no			Full Scale IQ Verbal Comprehension Composite Visual Spatial Composite Fluid Reasoning Composite	55 80 81 78 85	%ile 9 10 7 16
Provider: Dr. T (Psychology) Encounter Date: 2/X/2017 Impression: The patient's current ne Intelligence and memory along with symptoms of hyperactivity / impulsiv come evidence of challenges with at	DLOGICAL EVALUATION CLINIC NOTE uropsychological profile reflects solidly average weakness in visual-motor integration and signific rity and aggressiveness. To a lesser degree there tentional control and moodiness. This pattern of at with expectation for Hunter Syndrome.	cant also is	retinopathy Age 4: Neurocognitive behavioral conce noted; ADHD dia	erns	_	Age 6: Ongoing neurocognitive concerns; autism diagnos	sis	
Diagnoses: Neurocognitive dysfunction seconda ADHD, predominantly hyperactivity /	NEUROPSYCHOLOGICA Provider: Dr. T (Neuropsychology) Encounter Date: 2/X/2018 Impression: Compared to prior results, there progression across many domains, including is integration. However, it is important to be mil which could be impacting his performance in In sum, there appears to have been some slow	appears to have t intellectual capaci indful of his degre these domains.	been slowing in developmental ty, memory, and visual-motor te of attentional dysregulation,	En Su (A ve	icounter D immary: Ti SD), He ex	BEHAVIORAL EVALUATION DOCUMENTED PARENT LETTER . P (Behavioral Psychology at External Institution) rate: 2/X/2019 he patient meets the DSM-5 symptom criteria for a hibits developmental difficulty in the areas of both nunication. His social communication is far below to tal delay.	n Autism Spect	ication and n
rd ⋅md	although in part that could be attributable to that there has been deterioration in cognitive	increased attention	onal dysregulation. It is unlikely					76

Evaluation of multiple source documents is required to understand the patient journey in rare disease



Thank you!

Nancy Yu, CEO Kristina Cotter, PhD, CGC, MS, Research Director <u>nancy@rdmd.com</u> <u>kristina@rdmd.com</u>



Session I: Establishing a High-Quality RWD Ecosystem



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Collaborating Organizations

Lead – HPHC Institute

DEPARTMENT OF POPULATION MEDICINE



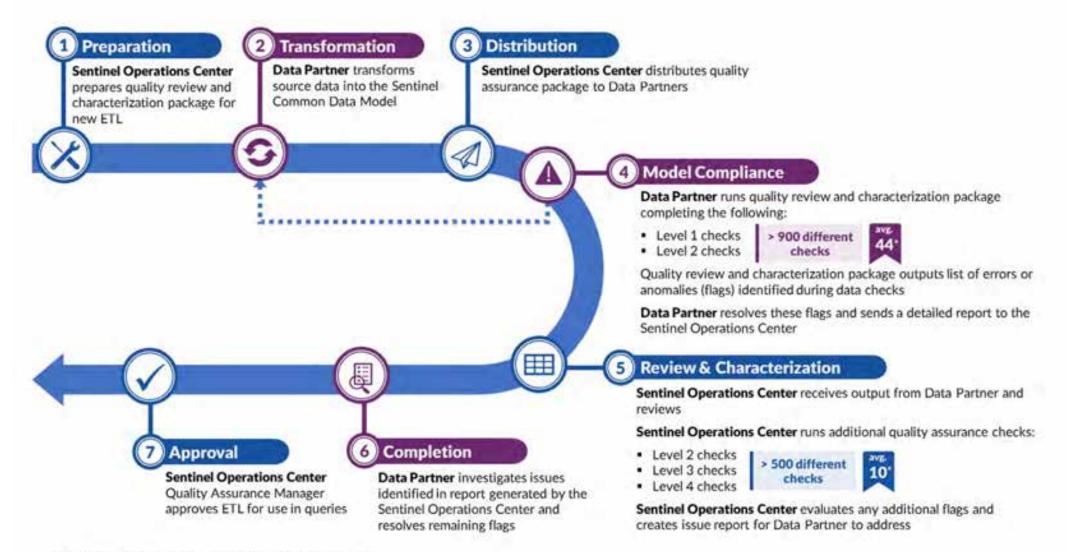
Harvard Pilgrim Health Care Institute



Available Data Elements

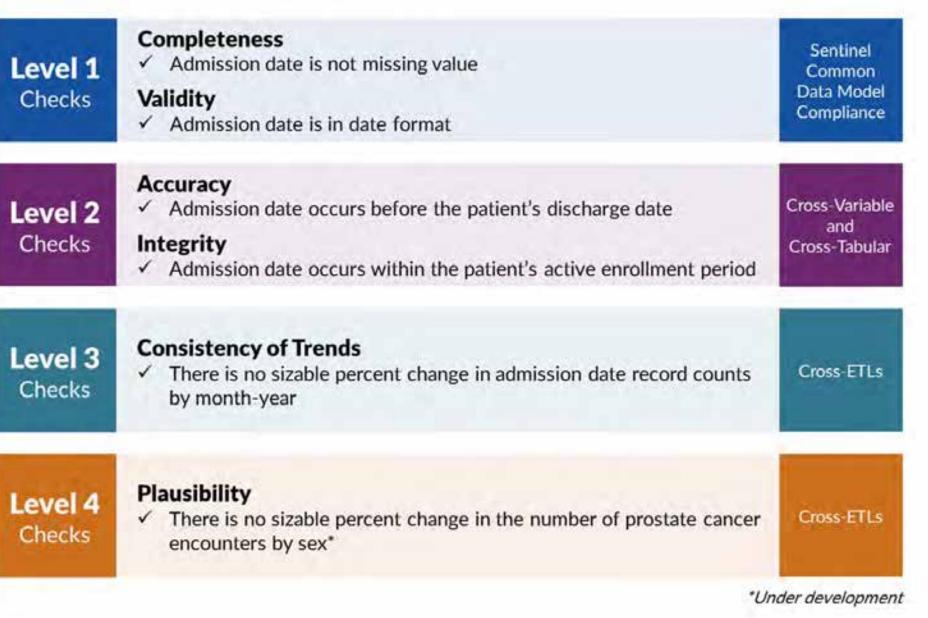
		Administra	ative Dat	a			Clinica	al Data
Enrollment	Demographic	Dispensing	Encou	inter	Diagnosis	Procedure	Lab Result	Vital Signs
Patient ID	Patient ID	Patient ID	Patien	nt ID	Patient ID	Patient ID	Patient ID	Patient ID
Enrollment Start &	Birth Date	Dispensing Date	Service I	Date(s)	Service Date(s)	Service Date(s)	Result & Specimen	Measurement Date
End Dates	Sex	National Drug Code	Encoun	ter ID	Encounter ID	Encounter ID	Collection Dates	& Time
Drug Coverage Zip Code		(NDC)	Encounter Type and Provider		Encounter Type an	d Encounter Type and	Test Type, Immediacy & Location	Height & Weight
Medical Coverage	Etc.				Provider	Provider		Diastolic & Systolic BP
Medical Record Availability		Amount Dispensed	Facil		Diagnosis Code & Type	Procedure Code & Type	Logical Observation Identifiers Names	Tobacco Use & Type
			Etc		Principal Discharge	e Etc.	and Codes (LOINC®)	Etc.
					Diagnosis		F 4-	
							Etc.	
	Registry D	ata			Inpatien	t Data	The second second second second second	t Linkage Data
Death	Registry D Cause of Dea		ccine	Inpati		t Data Inpatient Transfusion	Mother-Infan	t Linkage Data
Death Patient ID			1000 C		Inpatien		Mother-Infan Mother-Inf	
and the second second	Cause of Dea	ath State Vac Patient	ID	F	Inpatien ent Pharmacy	Inpatient Transfusion	Mother-Infan Mother-Inf Moth	ant Linkage
Patient ID	Cause of Dea Patient ID	ath State Vac Patient	ID n Date	F	Inpatien ent Pharmacy Patient ID	Inpatient Transfusion Patient ID	Mother-Infan Mother-Inf Moth Mother I	ant Linkage her ID
Patient ID Death Date	Cause of Dea Patient ID Cause of Dea	th State Vac Patient th Vaccination Admission	ID n Date n Date	F Admini	Inpatient ent Pharmacy Patient ID stration Date &	Inpatient Transfusion Patient ID Administration Start &	Mother-Infant Mother-Inf Moth Mother E Encounter	ant Linkage her ID Birth Date
Patient ID Death Date Source	Cause of Dea Patient ID Cause of Dea Source	th State Vac Patient th Vaccination Admission	ID n Date n Date e & Type	F Admini En	Inpatient ent Pharmacy Patient ID stration Date & Time counter ID nal Drug Code	Inpatient Transfusion Patient ID Administration Start & End Date & Time Encounter ID Transfusion	Mother-Infant Mother-Inf Moth Mother E Encounter Admission & I	ant Linkage her ID Birth Date r ID & Type
Patient ID Death Date Source Confidence	Cause of Dea Patient ID Cause of Dea Source Confidence	th State Vac Patient th Vaccination Admission Vaccine Code	ID n Date n Date e & Type er	F Admini En	Inpatient ent Pharmacy Patient ID stration Date & Time counter ID nal Drug Code (NDC)	Inpatient Transfusion Patient ID Administration Start & End Date & Time Encounter ID Transfusion Administration ID	Mother-Infant Mother-Inf Mother Mother B Encounter Admission & D Chil	ant Linkage her ID Birth Date r ID & Type Discharge Date
Patient ID Death Date Source Confidence	Cause of Dea Patient ID Cause of Dea Source Confidence	ath State Vac Patient th Vaccination Admission Vaccine Code Provide	ID n Date n Date e & Type er	F Admini En	Inpatient ent Pharmacy Patient ID stration Date & Time counter ID nal Drug Code (NDC) Route	Inpatient Transfusion Patient ID Administration Start & End Date & Time Encounter ID Transfusion	Mother-Infant Mother-Inf Mother Mother B Encounter Admission & D Child Bi	ant Linkage her ID Birth Date r ID & Type Discharge Date Id ID
Patient ID Death Date Source Confidence	Cause of Dea Patient ID Cause of Dea Source Confidence	ath State Vac Patient th Vaccination Admission Vaccine Code Provide	ID n Date n Date e & Type er	F Admini En	Inpatient ent Pharmacy Patient ID stration Date & Time counter ID nal Drug Code (NDC)	Inpatient Transfusion Patient ID Administration Start & End Date & Time Encounter ID Transfusion Administration ID Transfusion Product	Mother-Infant Mother-Inf Mother I Mother I Encounter Admission & I Child Bi Mother-Infant	ant Linkage her ID Birth Date r ID & Type Discharge Date Id ID irth Date

Data Quality Review and Characterization Process



* On average, there are 44 flags identified by the program and 10 additional flags identified by the Sentinel Operations Center per ETL

Data Quality Checks and Examples

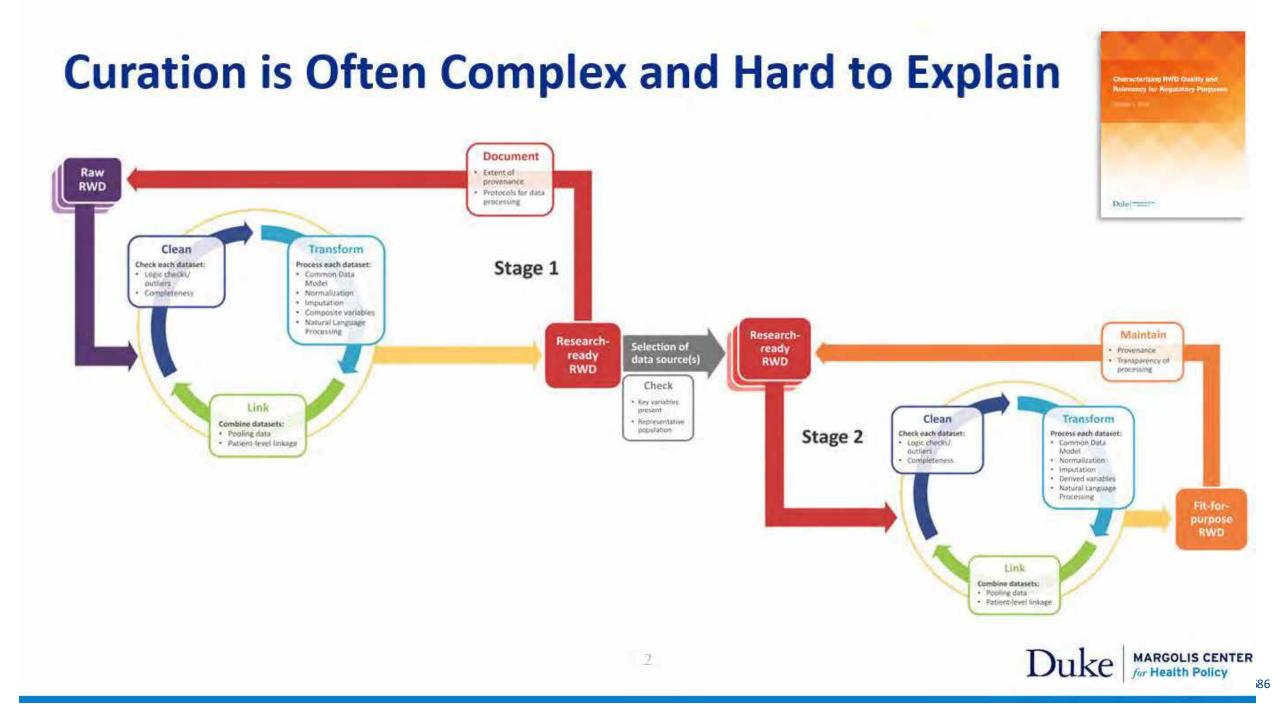


Sentinel Quality Review and Characterization Learnings

- NDC codes in the Procedure Table
 - SOC: There is a significant change in the number of records where the PX variable has values with special characters other than a decimal point across ETLs
 - Response: due to the addition of the claimline NDC to the PX variable; These NDC values are not adjudicated like pharmacy claims so often contain dash elements of the NDC code.
- ICD9 diagnosis/procedure codes post October 2015
- Claims before birthdate/Claims after deathdate
- Multiple patids for same members(kids 0-2) found while mom-baby linkage

Query Specific Quality Review and Characterization

- Cohort Identification and Descriptive Analysis Module (CIDA) identifies and extracts cohorts of interest from the Sentinel Distributed Database based on user-defined options
 - Exposures, outcomes, continuous enrollment requirements, incidence criteria, inclusion/exclusion criteria, relevant age groups, demographics
- Data Partners review output from CIDA requests to check for population plausibility, program errors, code list omissions
 - Data ambiguity from the time around birth when the infant does not have his or her own member number, so claims are submitted under the mother's ID
 - Review of code lists with internal NDC resources within specific queries or review of claim lines for code modifiers (biologics and biosimilars)



Session I: Establishing a High-Quality RWD Ecosystem



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Session II: Curating and Assessing Fit-for-Use RWD Derived from Electronic Health Records





Curation of EHR data

Keith Marsolo, PhD Associate Professor Department of Population Health Sciences Duke Clinical Research Institute Duke University School of Medicine



Disclosures

Consulting support from Novartis & IBM

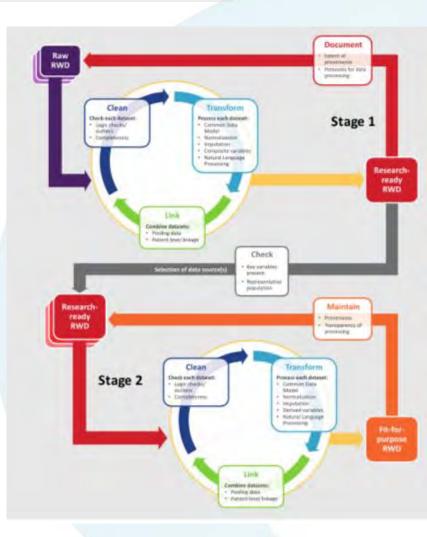
Co-inventor – Hive Networks, Inc.



Moving from raw data to fit-for-purpose – PCORnet®

PCORnet follows a two-stage process to assess suitability

- Foundational curation establish a baseline level of data quality ("minimum necessary")
- Study-specific ensure data are fit-for-purpose for a given study or analysis
- Foundational data curation is not static view as a continuous learning cycle
 - Continuous assessment of performance
 - Close gap between foundational and study-specific add new data checks based on study findings





Why foundational curation?

- Many EHR domains are being harmonized / standardized for the first time
- Given volume of data, can be overwhelming to both harmonize and assess fitness for specific study questions at the same time

Selected lab-related data checks (failure criteria)

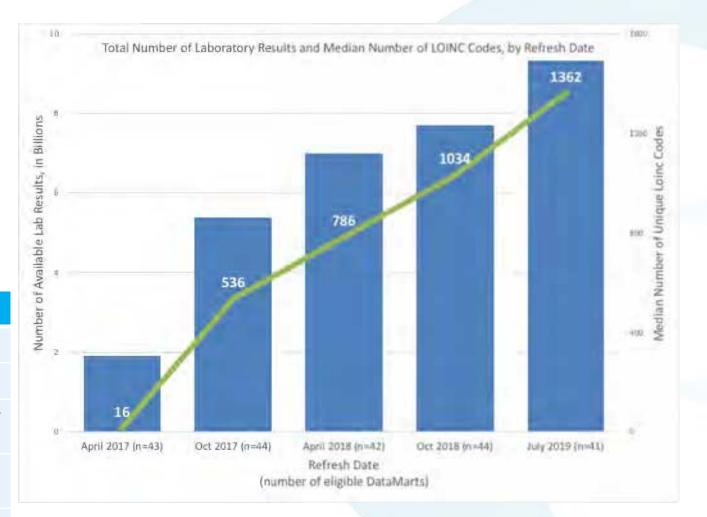
Less than 80% of lab results mapped to LOINC

Less than 80% of quantitative lab results specify the normal range

Less than 80% of quantitative lab results mapped to LOINC specify specimen source & result unit

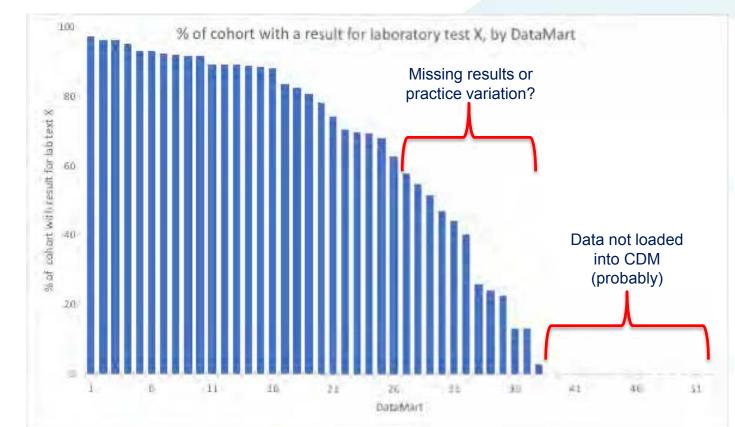
More than 5% of lab results have inappropriate specimen source [for selected tests]

Median lab result values for selected tests are statistical or clinical outliers



Study specific curation

- Identify potential quality concerns for key variables within a given study populations
- Need to determine whether issues are related to the data or reflect normal practice variation

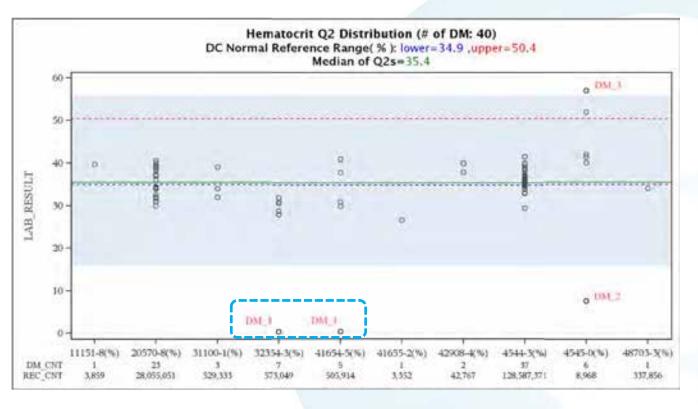




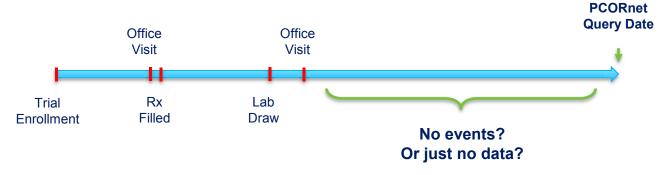
Minimum necessary data checks

- Need to align checks with purpose
- Will data be confirmatory, or serve as stand-alone outcome / endpoint
- If minimum threshold cannot be met, can dataset be used for something else?

Selected lab-related data checks (failure criteria)	% of DataMarts passing (most recent refresh; n=41)
Less than 80% of lab results mapped to LOINC	85%
Less than 80% of quantitative lab results specify the normal range	42%
Less than 80% of quantitative lab results mapped to LOINC specify specimen source & result unit	37%

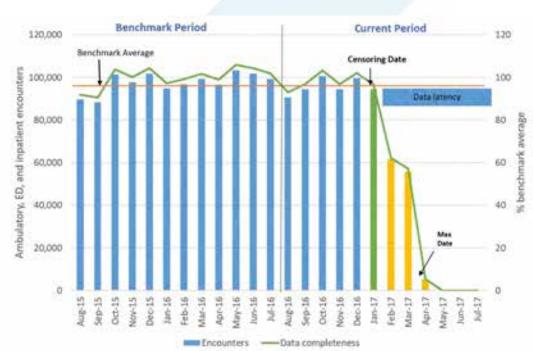


Curation as a learning process – data latency



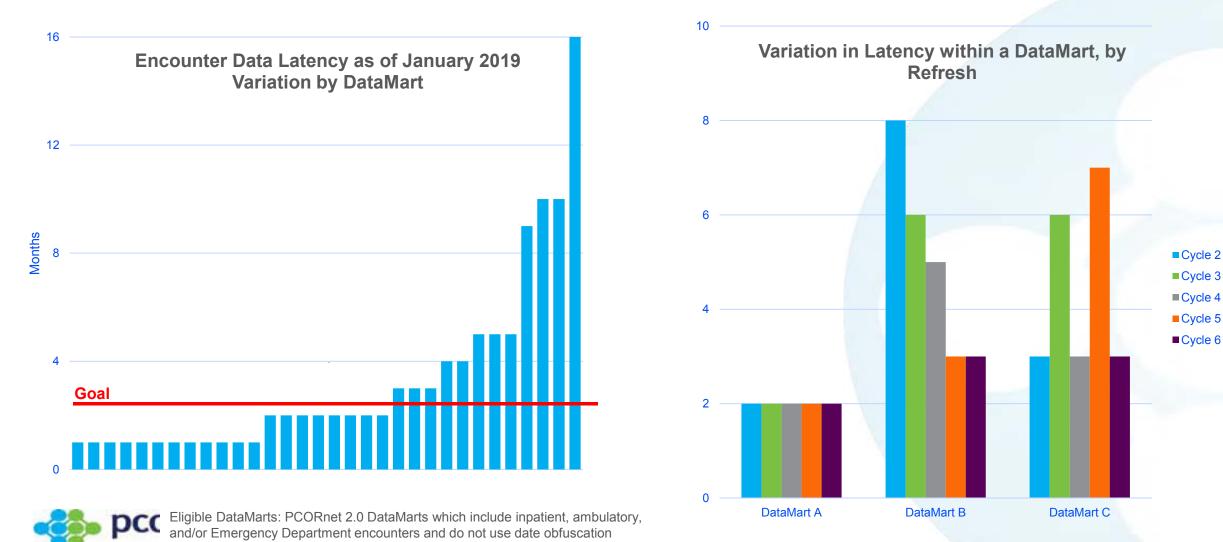
Latency / completeness of data

- Questions:
 - *"How complete & up-to-date are the data?" (DSMB)*
 - "What's the data censoring date for participants?" (Statistician)
- Developed latency calculation & incorporated into data curation





Curation as a *continuous* **learning process**



Summary

Data curation should be viewed as a process for continuous quality improvement

- May not end up with a single set of "minimum necessary" checks consider tiered approach
- S As best practices are developed, need a better way to share methods, results, etc.
- Have spent years understanding the pitfalls of working with administrative claims will take time to develop that knowledge around EHR data



Session II: Curating and Assessing Fit-for-Use RWD Derived from Electronic Health Records











Session III: Leveraging Digital Technology for Patient-Generated Health Data





evidation

Understanding PGHD Data Quality in the Real World

Ernesto Ramirez, PhD Senior Data Scientist Evidation Health, Inc.

eramirez@evidation.com
 @eramirez

Developing Real-World Data and Evidence to Support Regulatory Decision-Making | Duke-Margolis Center for Health Policy

Outline

Background: Person-Generated Health Data (PGHD)

Case Study: Developing Measures of Cognitive Impairment in the Real World from Consumer-Grade Multimodal Sensor Streams

Data Quality: Five considerations for PGHD

Person-Generated Health Data (PGHD) enables continuous monitoring of health outcomes at the individual level so we can better understand and measure a person's experience.

OBJECTIVE EVERYDAY DATA

Collected via sensors and apps

He

Exercise

Steps Sleep c Calorie

Fat perc

	One person, one year
eart rate	man man man
calories	Narrow Lowshiph Income a contract a children and a contract the
s walked	man M
duration	where you was a supported by a support of the suppo
es eaten Weight	anonomic non main the the state in the second and the in
centage	many which we are the and the with the many
	marker which have the sen there was a have a house

PHENOTYPIC LABELS

Collected via questionnaires Some values can be verified via traditional data sources (e.g., claims, labs, EHR)

Age Gender Ethnici	ity/race	Medical diagnoses	Prescription dr	ugs Smoking
Education Household	Zip code	Patient-reported	outcomes Fast	food consumption
Employment status	Employer	Supplements	Quality of life	Alcohol use
Insurance carrier	Height / we	light Major medi	cal events Sle	ep quality

EXAMPLE DIGITAL ASSAYS

Direct assessment Functional mobility Sleep reliability Weight range

Behavioral inference Routine/consistency Digital utilization Responsiveness

Clinical inference Exacerbation events Treatment utilization Disease progression PGHD allows for measuring novel outcomes for chronic conditions at the population level.

People w/ T2DM	Matched controls
4,459	10,321
78.7%	80.7%
6.48	6.69
0.72	0.77
71.2	66.0
	w/ T2DM 4,459 78.7% 6.48 0.72

	People w/ MS	Matched controls
Number of activity trackers	498	1,400
% days with tracked steps**	73%	77%
Mean daily step count**	6,379	7,188
Mean nightly sleep duration (hours)	6.3	6,5
Max time to fall asleep (minutes)**	18.58	13.91

SOURCE. USING CLAIMS AND WEARABLE DEVICES DATA TO QUANTIFY INFLUENZA OUTCOMES AMONG TYPE 2 DIABETES PATIENTS - A POPULATION STUDY. SAMSON ET AL., AMERICAN DIABETES ASSOCIATION, JULY 2018

SOURCE: REAL-WORLD USE OF WEARABLE DEVICES IN A LARGE MULTIPLE SCLEROSIS COHORT FOSCHINI ET AL., AMERICAN ACADEMY OF NEUROLOGY, APRIL 2018

Outline

Background: Person-Generated Health Data (PGHD)

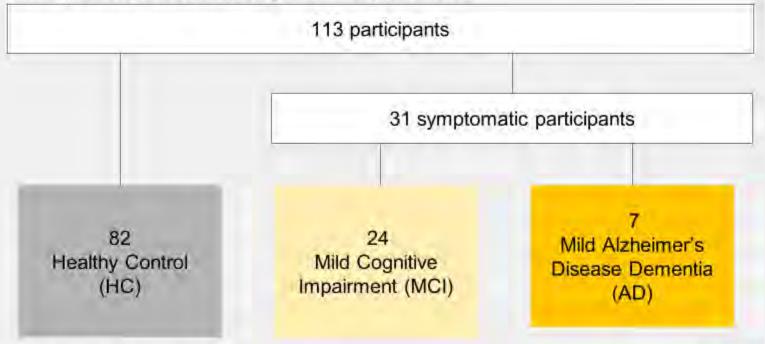
Case Study: Developing Measures of Cognitive Impairment in the Real World from Consumer-Grade Multimodal Sensor Streams

Data Quality: Five considerations for PGHD

Evidation, along with collaborators at Eli Lilly and Apple, recently completed a study using PGHD in participants with cognitive decline.

Objectives

- Assess the feasibility of collecting and processing data from multiple smart devices of older adults with and without cognitive impairment in their daily lives.
- Test whether data from these devices can differentiate between healthy controls and participants with cognitive impairment.

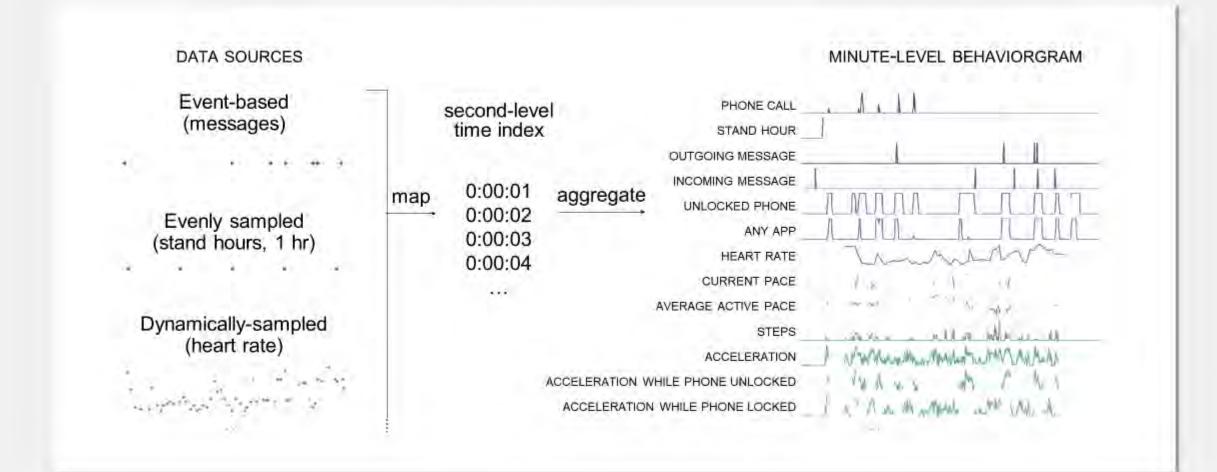


Participants were given an iPhone, Apple Watch, and Beddit sleep monitor to use as their primary devices over the course of the 12 week study, as well as an iPad to complete at-home cognitive tests.



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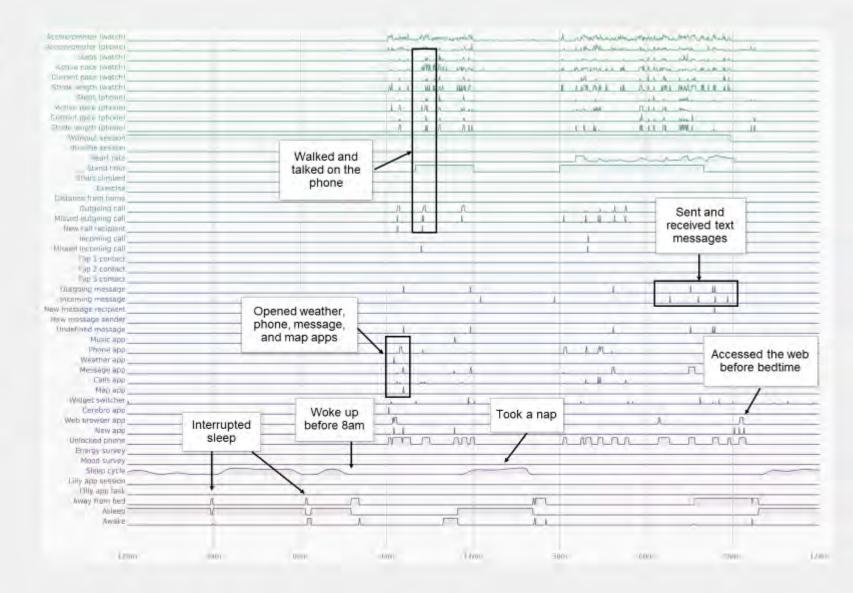
We processed, aligned, and combined data from all the different data sources to create a single behaviorgram for each participant.



8

The behaviorgram offers a rich representation of an individual's behavior.

It also serves as tool for data exploration, hypothesis generation, and most importantly, a way inspect the quality of the data.



Outline

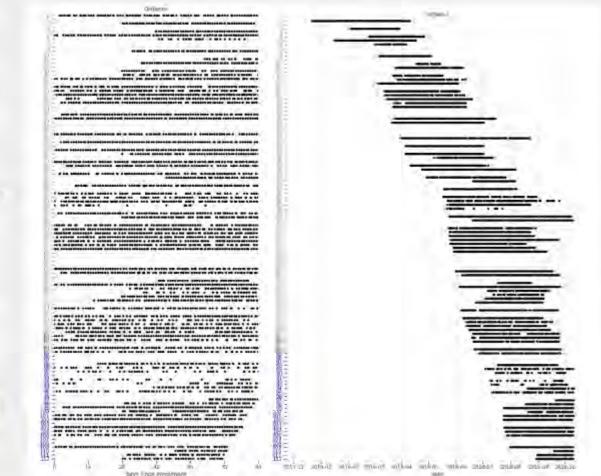
Background: Person-Generated Health Data (PGHD)

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Data Quality: Five considerations for PGHD

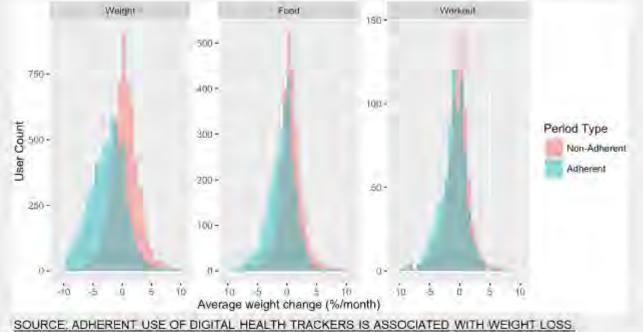
One: Understand and characterize your data, then determine reasons for observed issues with collected data.

- Identify and characterize issues in data by using data coverage tools and reports.
 - Use an aligned and standardized resolution to produce visualizations for quick exploration.
- Determine if issues are systematic (due to device sensors, data collection or ingestion) or behavioral.
 - Understanding system architecture and data flows is crucial for developing data quality checks.
 - Real-world data means encountering real-world problems.



Two: Develop and implement replicable methods for dealing with issues.

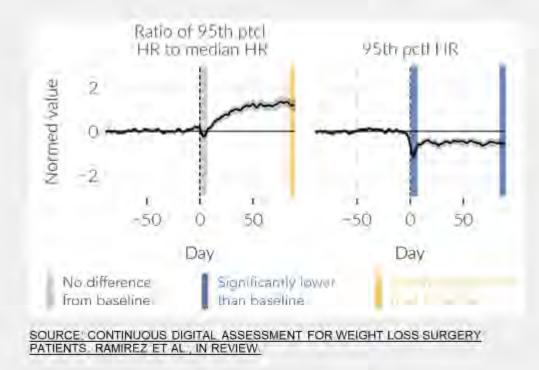
- Systematic issues can be addressed using appropriate imputation techniques.
 - Sparse sampling? Impute to fill the gaps
 - Use cross-channel information to determine the correct strategy.
- Issues due to behavioral factors need further exploration for possible inclusion.
 - Missingness can be an informative feature in many situations.



POURZANJANI ET AL., PLOS ONE 2016

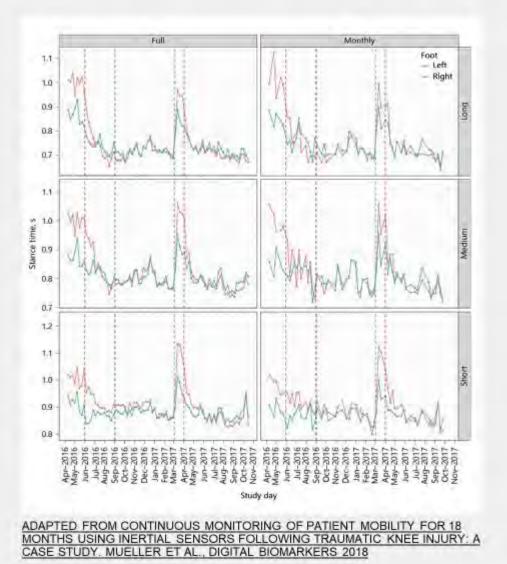
Three: Apply appropriate analysis methods that accurately characterizes the outcomes of interest

- PGHD will typically include outliers that may reflect true observations.
 - Real-world data capture needs to account for data collection issues and behavioral artifacts.
 - Important to thoroughly investigate outliers for plausibility.
- Use statistical aggregations that are robust to outliers. For example:
 - Mean Median
 - Max 95th Percentile
 - Standard Deviation Interguartile Range



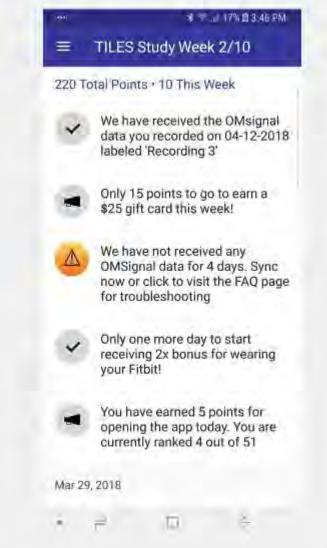
Four: Test endpoint(s) for sensitivity to potential issues with data quality.

- Are the endpoints robust to varying amounts of available data / compliance?
 - Resample data to simulate changes in data availability and evaluate for minimum required data.
 - What is the minimum amount of data need to generate sound inferences?



Five: Use features of continuous data streams to evaluate and improve data quality in real-time.

- Capitalize on data availability to build real-time quality checks.
 - Completeness and conformance checks do not need to wait until data collection is finalized.
 - Data flows can be checked against minimum standards related to compliance and plausibility.
- Use data as a feedback mechanism to involve participants in data quality process.
 - Real-time feedback can improve participant engagement.



evidation

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Session III: Leveraging Digital Technology for Patient-Generated Health Data



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Integrating Multi-Dimensional Real World Data to Accelerate Research and Enhance Patient Centricity

Angela Dobes, MPH Senior Director, IBD Plexus



IBD Plexus is designed to support



Discovery



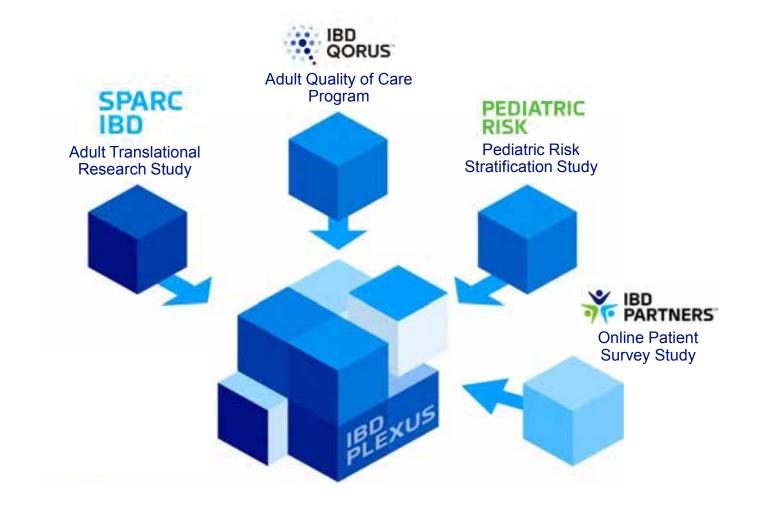
Clinical Development 20

Post Approval





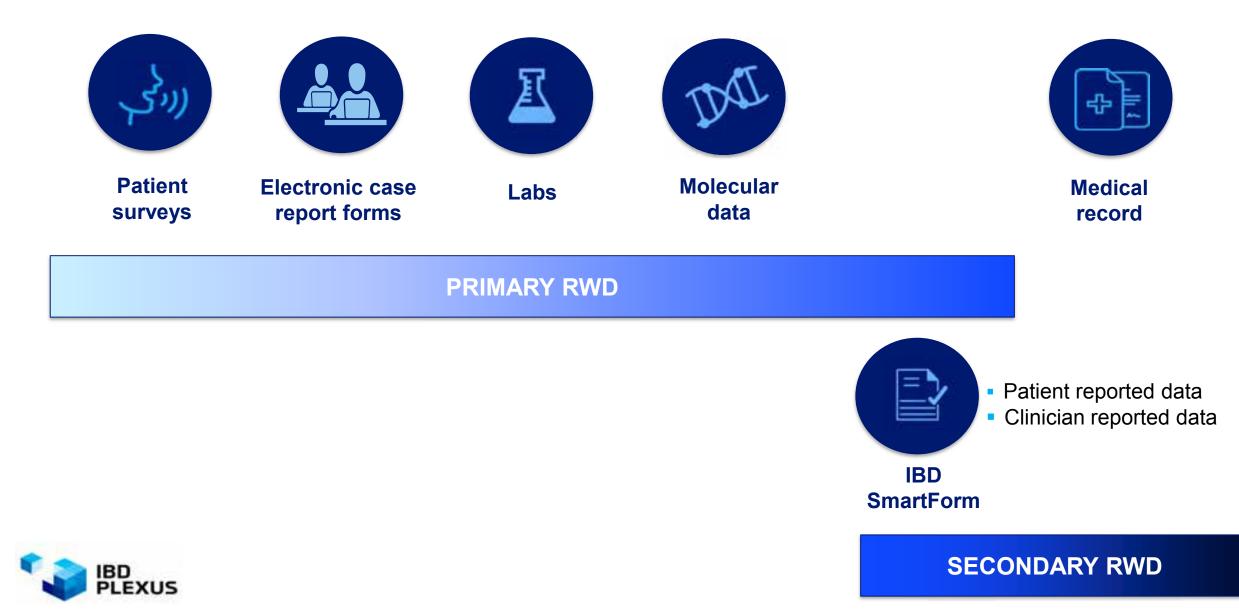
Diverse research cohorts for cutting edge research







Real-world data integrated & linked within & across cohorts



Information Management Lifecycle

Standardization & normalization

- Data collection standards & protocols
- Common data models
- Data harmonization tools

Registration & authentication

- · Master consent / HIPAA authorization
- Multi-study registration functionality
- · Patient re-contact capabilities

Integration & linkage

- Data integration engine & processing tools
- Master patient index engine
- Patient-level linkage

IBD

Plexus

Quality control

- Built-in data profiling & error reporting mechanisms
- Balance between system & manual data checks
- Processing history controls

Prep-to-research tools

- Data querying capabilities
- Data visualization and insight tools



Data delivery

- · Automated data provisioning process
- Raw & research-ready datasets
- Data dictionary
- White glove service



Achieving Research & Development Efficiencies with RWD



4 Research study cohorts



Over 70 participating sites



8 Pharmaceutical companies



3 Ancillary study awards (CDC, NIH, PCORI)



- Hypothesis generation
- Drug development tools
- Study feasibility & recruitment
- Identification of characteristics for enrichment or stratification







Mindful of the patient journey, we embrace a patient-centric approach to all decision-making and mission delivery.



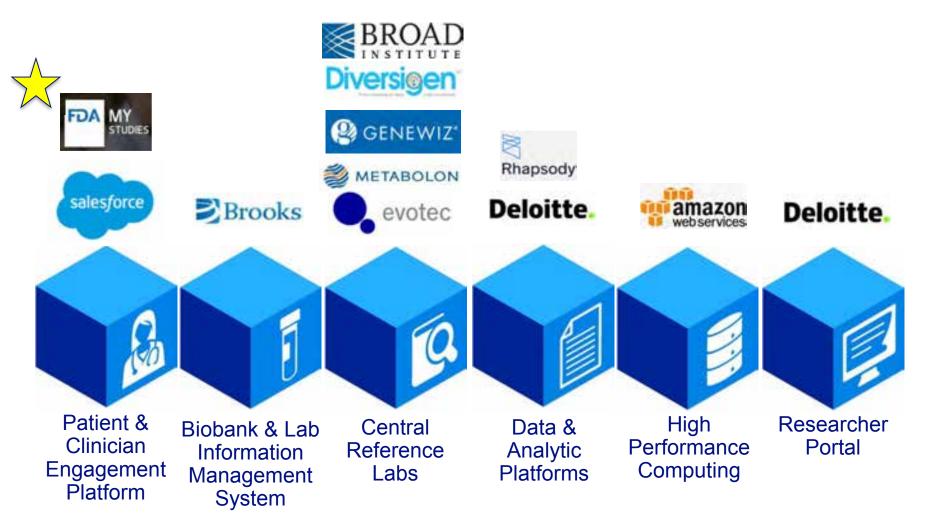


FDA Real-World Evidence Program Demonstration Project





Powering IBD Plexus







Demonstration Project Goals

- Explore the use of a digital mobile app to fill data gaps
- Capture the patient experience beyond the clinical delivery system
- Establish a more comprehensive picture how medical products function beyond the controlled restrictions of traditional randomized clinical trials
- Help assess the use of patient-generated health data to support RWE





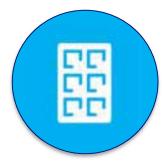
Establishing a High-Quality PGHD Ecosystem:

Patient reported data considerations



Completeness

- Disease activity
- UX barriers
- Life events



Conformance

- Standards
 - Instruments
 - Mechanisms
- Collection windows



Credibility

- Validation
- Recall bias
- Business rules

Error profiling reports & quality checks











Session III: Leveraging Digital Technology for Patient-Generated Health Data



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Session IV: Methodological and Analytical Considerations for Observational Studies



Join the conversation with **#RWE2019**



Session IV: Methodological and Analytical Considerations for Observational Studies

Where Have We Come From – Where Are We Now – Where Are We Going?

Til Stürmer, MD, MPH, PhD October 3rd, 2019

Developing Real-World Data and Evidence to Support Regulatory Decision-Making National Press Club • Washington, DC









Disclosures

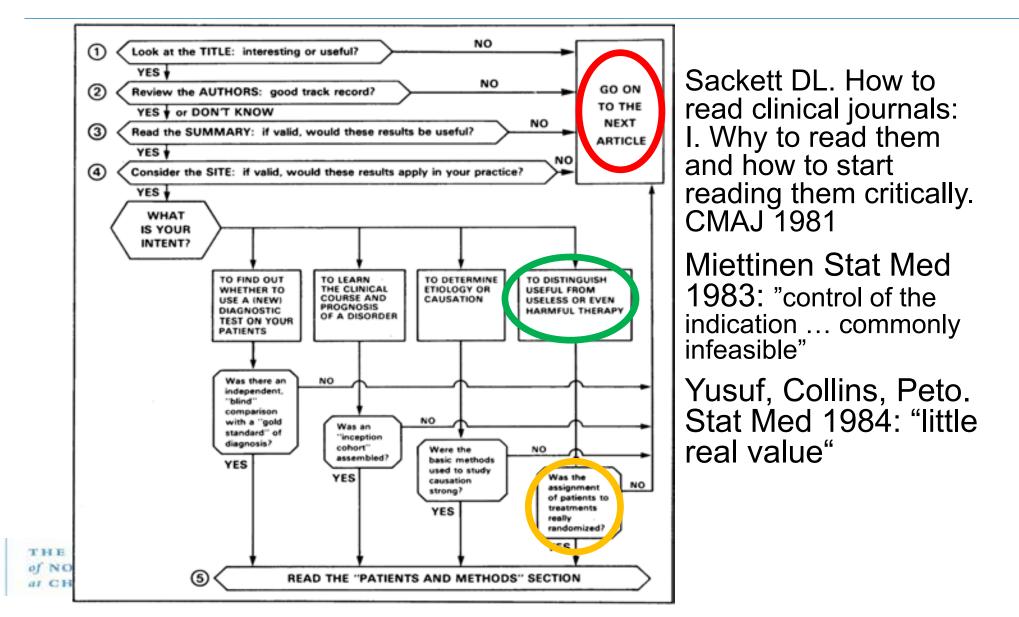
The following personal or financial relationships relevant to this presentation existed during the past 12 months:

- I receive investigator-initiated research funding and support as Principal Investigator (R01 AG056479) from the National Institute on Aging (NIA), and as Co-Investigator (R01 HL118255, R01MD011680), National Institutes of Health (NIH)
- I receive salary support as Director of Comparative Effectiveness Research (CER), NC TraCS Institute, UNC Clinical and Translational Science Award (UL1TR002489), from the Center for Pharmacoepidemiology (current members: GlaxoSmithKline, UCB BioSciences, Merck, Takeda), from pharmaceutical companies (Novo Nordisk), and from a generous contribution from Dr. Nancy A. Dreyer to the Department of Epidemiology, University of North Carolina at Chapel Hill.
- I do not accept personal compensation of any kind from any pharmaceutical company
- I own stock in Novartis, Roche, BASF, AstraZeneca, and Novo Nordisk.



Where Have We Come From?

Intractable Confounding



Confounding by Indication

- Good prescribing leads to confounding of drug effects on intended outcomes
- More severe disease more likely to
 - Be treated (with higher doses)
 - Have higher risk of adverse outcomes
- Assessment of severity of disease
 - Often difficult
 - Intractable for intended effects (Miettinen 1983; Yusuf, Collins, & Peto 1984)
- Drug looks BAD compared with NON-USERS!



Confounding by Frailty

- Individuals close to death are
 - Less likely to receive preventive treatments
 - E.g., statins, flu vaccination
 - More likely switched to palliative treatments
 - E.g., opiates instead of NSAIDs
 - More likely to receive certain classes of drugs
 - E.g., loop diuretics vs. other diuretics
- Paradoxical drug mortality associations
- Drug looks GOOD compared with NON-USERS!



Ignoring Adherence and Time on Treatment

Epidemiology

Statin Adherence and Risk of Accidents A Cautionary Tale

Colin R. Dormuth, ScD; Amanda R. Patrick, SM; William H. Shrank, MD; James M. Wright, MD, PhD; Robert J. Glynn, PhD, ScD; Jenny Sutherland, BSc; M. Alan Brookhart, PhD

Format: Abstract -

Send to -

Am J Epidemiol. 2019 Mar 27. pii: kwz066. doi: 10.1093/aje/kwz066. [Epub ahead of print]

Keeping the Demons At Bay When Handling Time Varying Exposures: Beyond Avoiding Immortal Person Time.

Edwards JK¹, <u>Htoo PT¹, Stürmer T¹.</u>

Author information

1 Department of Epidemiology, University of North Carolina at Chapel Hill.



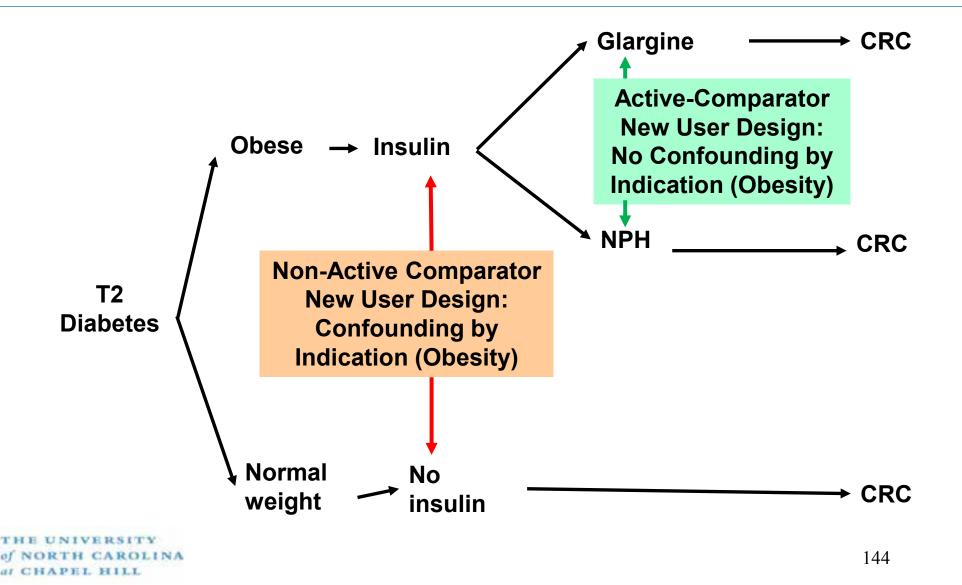
Conclusions: Where Have We Come From?

- Comparison of prevalent drug users to nonusers standard study design until ~15 years ago
- Suffers from all these biases: Often invalid
- Statements about validity of nonexperimental research based on such comparisons/designs
- There may be few exceptions where biases work in our "favor" (e.g., long latent period)



Where Are We Now?

Active Comparator, New User Design



Confounding Control by Design: BMI

Table 4—Effect of BMI on channeling between initiating glargine versus initiating NPH: external validation studies

	Glargine	NPH
MGH		
n	574	412
BMI (kg/m ²), mean \pm SD*	32.7 ± 7.53	32.4 ± 8.43
BMI (kg/m ²), n (%)		
<19	4 (0.7)	8 (1.9)
19 to <25	77 (13.4)	67 (16.3)
25 to <30	150 (26.1)	105 (25.5)
30 to <35	146 (25.4)	104 (25.2)
35 to <40	114 (19.9)	64 (15.5)
40 to <45	45 (7.8)	36 (8.7)
≥45	38 (6.6)	28 (6.8)



THE UNIVERSITY of NORTH CAROLINA at CHAPEL HILL Stürmer T, Marquis MA, Zhou H, Meigs JB, Lim S, Blonde L, MacDonald E, Wang R, LaVange LM, Pate V, Buse JB. Cancer incidence among those initiating insulin therapy with glargine versus human NPH insulin. Diabetes Care 2013;36:3517-25. 145

Active Comparator, New User Design

- Kramer et al. J Chron Dis 1987;40:1073-85:
 - "Compared with what? .. it is important to compare that risk with that of some other real therapeutic option for patients with the same clinical indication. Just as in a clinical trial investigating treatment efficacy, any epidemiologic study of treatment risks should compare two or more viable treatment alternatives."
 - ".. measuring risks conditionally on .. indication is ..
 essential to reduce confounding"
 - *"For what period of time?* The risk posed by a drug for a ... event is not generally the same in the sixth month of chronic therapy as in the first or second week."



THE UNIVERSITY of NORTH CAROLINA at CHAPEL HILL New user part previously mentioned by Feinstein 1971 – see: Lund JL, Richardson DB, Stürmer T. The active comparator, new user study design in pharmacoepidemiology: historical foundations and contemporary application. Current Epidemiology Reports 2015;2:221-8.

Conclusions: Where Are We Now?

- Active comparator, new user design dramatically reduces potential for bias due to
 - Confounding by indication
 - Confounding by frailty
 - Non-adherence/time-varying hazards
 - Immortal time
- Focus on intervention needed for causal inference
- Comparator selection obviously important
- Standard design for nonexperimental CER

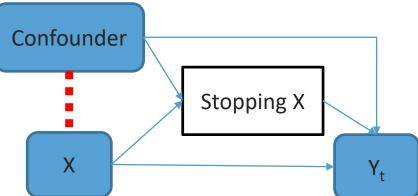


Where Are We Going?

1. On-Treatment Estimates and Selection Bias

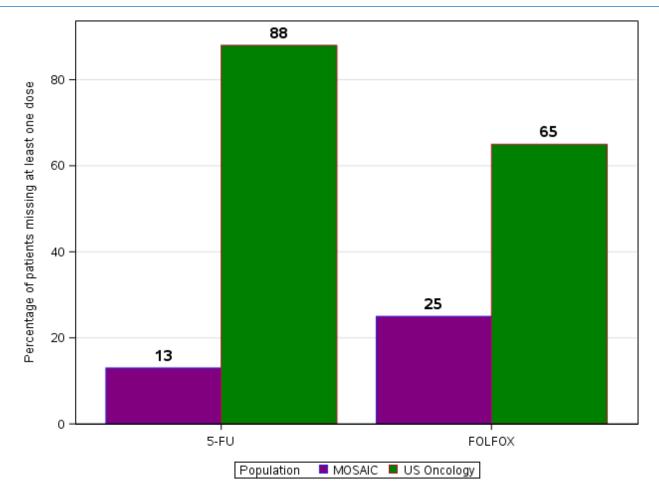
- If stopping study medication is differential by treatment and staying on treatment is affected by confounders, conditioning on remaining on treatment opens up a biasing path
- This path can be closed by inverse probability of censoring weights

PS: note that this is true in absence of baseline confounding, i.e., including RCTs!





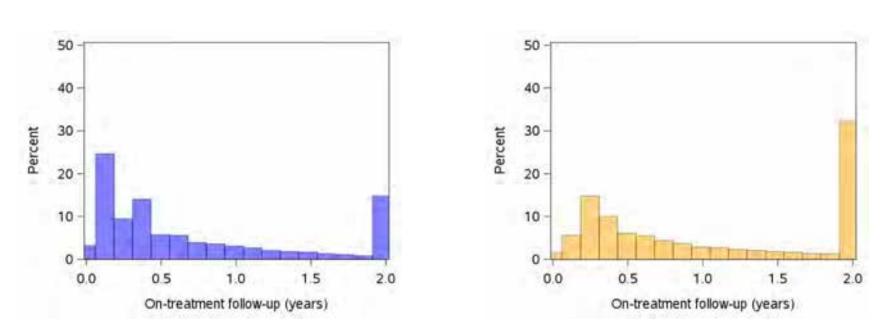
Frequency Missing at Least One Chemo Dose



Jennifer L. Lund, PhD (PI) Enhancing Hybrid Study Designs for CER PCORI ME-2017C3-9337



On-Treatment Follow-Up in US Medicare



Dabigatran New Users

Warfarin New Users

Median OT FU: 152 days (P25: 60, P75: 382)

Median OT FU: 259 days (P25: 117, P75: 625)



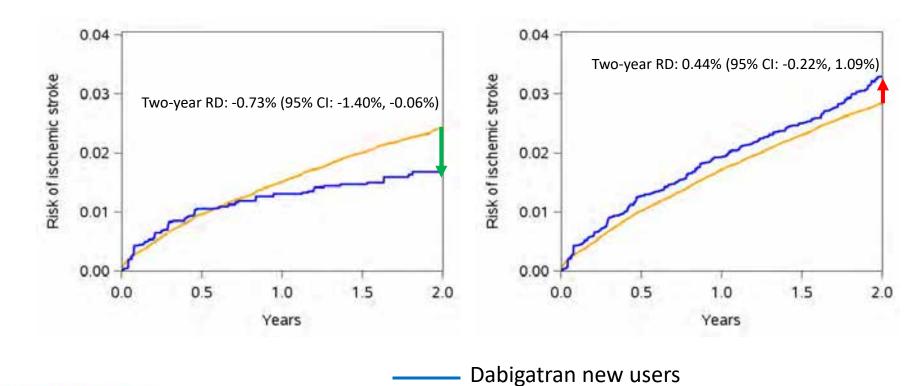
Slides Adapted from Michael Webster-Clark, PharmD, PhD, presented at 35th ICPE, Philadelphia, August 2019

Dabigatran vs Warfarin and Ischemic Stroke

On Treatment

Initial Treatment

Warfarin new users





152

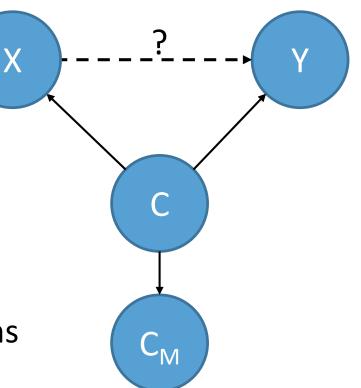
Conclusions On-Treatment Estimates

- The benefit (and harm) of treatments may not be realized in the real world due to lack of adherence
- This complicates RCT generalizability
- Methods to "account" for non-adherence depend on measured predictors of non-adherence
- Linkage of claims with e.g., EHR data will help with prediction
- Identification of barriers to adherence (subgroups most likely to benefit from interventions) important



2. Single-Arm Trials and Confounder Adjustment

- We have data from a single arm trial of a preventive drug, as well as insurance claims (comparator)
- Physicians preferentially recruit patients that smoke (C) in the single arm trial since smokers are at higher risk for (Y)
- We can only measure C_M with high specificity but low sensitivity in claims

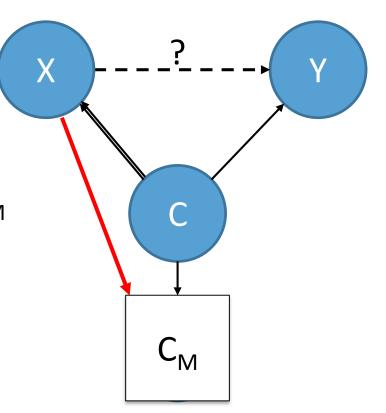




Slides Adapted from Michael Webster-Clark, PharmD, PhD, presented at 35th ICPE, Philadelphia, August 2019

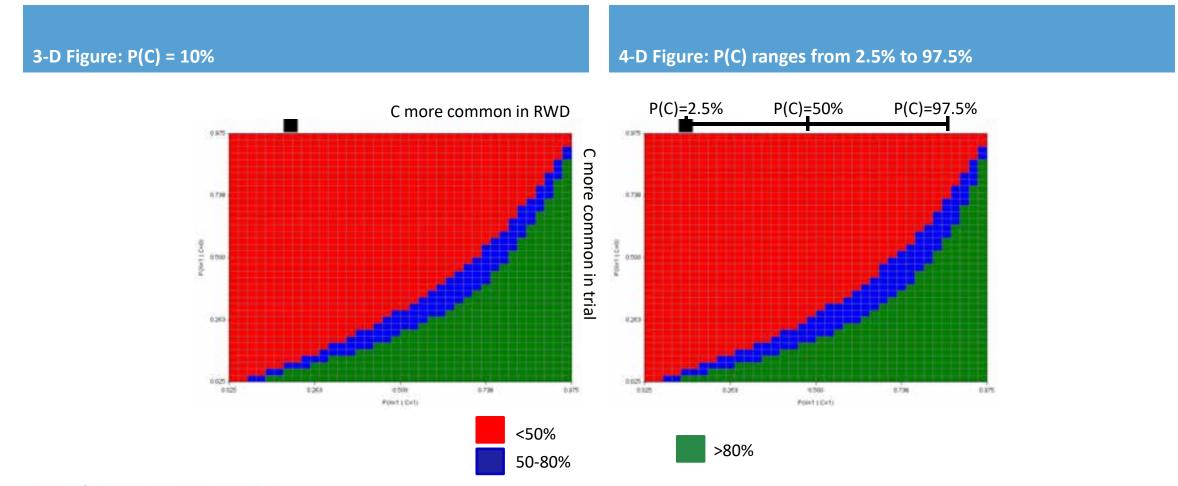
Three Major Graphical Conclusions

- If there is no X->C_M arrow, adjusting for C_M cannot generate bias
 - Will partially control for C
- If there is a X->C_M arrow but no C->X arrow, adjusting for C_M will always generate bias
- If both arrows exist, their direction and strength determine overall bias





Confounding Control When Sensitivity is Low (claims)

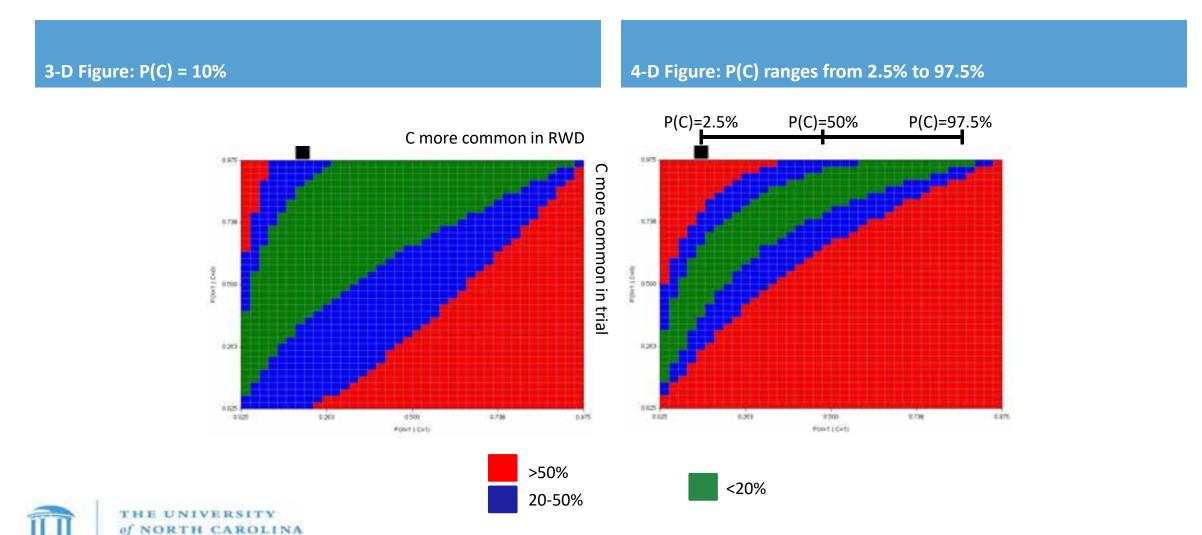




CAROLINA

Michael Webster-Clark, PharmD, PhD, unpublished

Bias in Stratum C=1 When Specificity is 0.99



ar CHAPEL HILL

Conclusions: Single-Arm Trials and Confounder Adjustment

- If sensitivity or specificity of a covariate differ, the effects of controlling for C_M depend on:
 - Strength and direction of causal effects on X and Y
 - Prevalence of the confounder
 - Type and degree of differential misclassification
- Restriction is not always a solution, even when both data sets have high (not: perfect!) specificity
- We can identify parameter spaces where confounding can be sufficiently controlled for



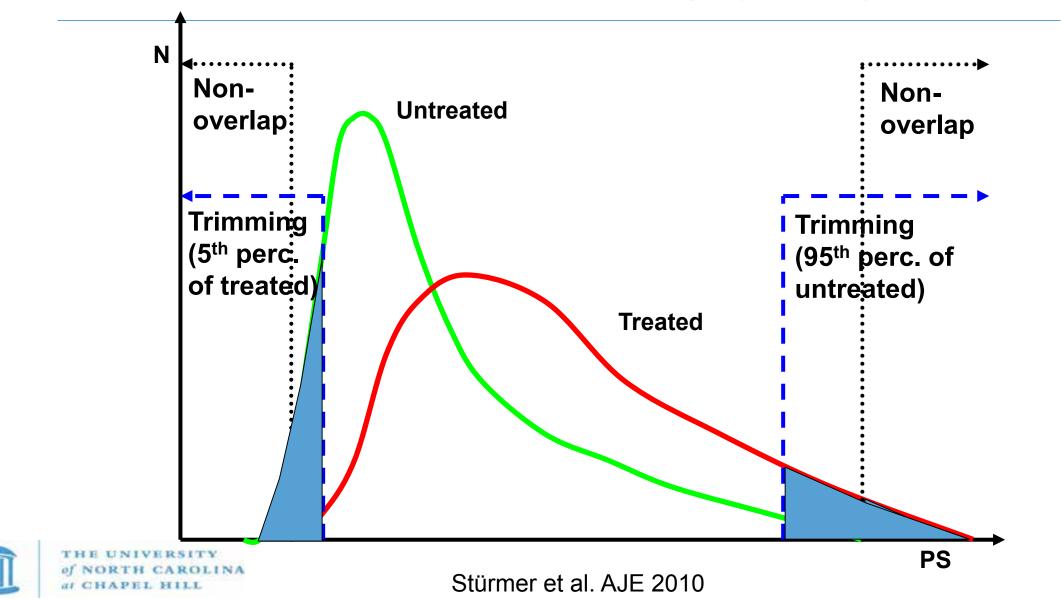
3. PS to Identify Study Population at Equipoise

TH

at CHAPEL HILL

American Journal of Epidemiology Vol. 172, No. © The Author 2010. Published by Oxford University Press on behalf of the Johns Hopkins Bioomberg School of DDI: 10.1093/ajs/kwq1* Advance Access publicatic August 17, 20	98 ⁹⁹ xi: 10.1093/biomet/asn055
Practice of Epidemiology	
Treatment Effects in the Presence of Unmeasured Confounding: Dealing With Observations in the Tails of the Propensity Score Distribution—A Simulation Study	average
Received: 5 October 2018 Revised: 6 March 2019 Accepted: 6 May 2019	Dovepress
Til Stürmer*, DOI: 10.1002/pds.4846	c and medical resourch
* Correspondent Carolina at Chap ORIGINAL REPORT	WILEYODOLOGY
	rative
Comparison of alternative approaches to trim su	ubjects in the
tails of the propensity score distribution	1 Walker ¹ atrick ²
Robert J. Glynn ¹ Mark Lunt ² Kenneth J. Rothman ³ Charles Poo	le ⁴ l nbrook ⁴
Sebastian Schneeweiss ¹ Til Stürmer ⁴ () Department of Economics, University of Miami, Coral Gables, Florid	Marin ^s
omitnik@miami.edu	Véronique L Roger ⁷
UNIVERSITY	Paul Stang [®]
ORTH CAROLINA	Sebastian Schneeweiss ²

Trimming Patients Treated Contrary to Prediction to Reduce Unmeasured Confounding by Frailty



Conclusions: PS to Identify Study Population at Equipoise

- Focus on treatment decision is unique PS advantage
- Little equipoise between treatments in tails of PS
- Heterogeneity of treatment effects in tails plausibly due to unmeasured confounding (vs. real)
- Trimming small proportions of study population in tails of PS can improve validity
- Need more work/guidance on amount of trimming
- Define bias vs. treatment effect in target population (target validity; Westreich et al AJE 2019) promising



Til Stürmer (PI) Propensity Scores and Preventive Drug Use in the Elderly. National Institute on Aging (R01 AG056479)

4. Evaluate Adequacy of Sensitivity Analyses

Objectives

- Aid CDER in the development of guidance on use of sensitivity analyses to evaluate uncontrolled confounding
- Enhance the capacity of FDA to critically evaluate adequacy of sensitivity analyses of unmeasured confounding for assessment of non-experimental studies

Activities

- Identify and evaluate methods for assessment of bias due to uncontrolled confounding
- Provide tailored training for scientists at FDA
- Disseminate findings to research community







THE UNIVERSITY of NORTH CAROLINA at Chapel Hill Michele Jonsson Funk (PI) FDA Contract Award No. 75F40119C10115. Methodological Advances in the Assessment of Uncontrolled Confounding

Thank you

sturmer@unc.edu til.sturmer@post.harvard.edu



Session IV: Methodological and Analytical Considerations for Observational Studies



Join the conversation with **#RWE2019**



RCT replication with observational data

William Crown, PhD Chief Scientific Officer, OptumLabs

October 3, 2019





18

GOLLABORATON

ROIECT

The Cochrane Collaborative¹ examined 14 prior reviews comparing RCTs to observational studies:

Collectively, these reviews included data on 1,583 meta analyses spanning 228 medical conditions.

- 11 of 14 studies (79%) found no difference in ratios of odds ratios (ROR)
- One review suggested larger ROR for observational studies
- Two reviews suggested smaller ROR for observational studies

Earlier studies showed similar results.^{2,3}

"Our results showed that, on average, there is little difference between the results obtained for RCTs and observational studies."

1. Anglemyer A, Horvath HT, Bero L. Healthcare outcomes assessed with observational study designs compared with those assessed in randomized trials (Review). The Cochrane Library 2014, Issue 4. 2. Benson K, Hartz AJ. A Comparison of Observation Studies and Randomized, Controlled Trials. N Engl J Med 2000; 342: 1878–86 . 3. Concato J, Shah N, Horwitz RI. Randomized, Controlled Trials, Observation Studies and the Hierarchy of Research Designs. N Engl J Med 2000; 342: 1887–92.





Causal frameworks are needed to actually replicate the RCTs

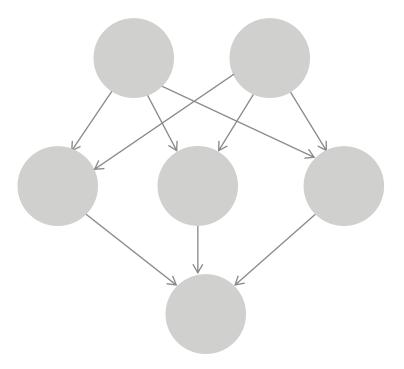
- Pearl, J (2013). Causality: Models, Reasoning, and Inference. 2nd Edition. New York, NY: Cambridge University Press.
- Van der Laan MJ, Rose S (2011). Targeted Learning: Causal Inference for Observational and Experimental Data. New York, NY: Springer-Verlag.
- Rubin, D (1974). Estimating Causal Effects of Treatments in Randomized and Nonrandomized Studies. Journal of Educational Psychology 64, 688-701.
- Heckman, J (1976). "The Common Structure of Statistical Models of Truncation, Sample Selection, and Limited Dependent Variables and an Estimator for Such Models." Annals of Economic and Social Measurement 5: 475–492.
- Zellner A, Theil H (1962). Three-Stage Least Squares: Simultaneous Estimation of Simultaneous Equations." Econometrica 30(1):54-78.





There are many methods for causal modeling with health care data

- Standard regression models with quasiexperimental design
- Propensity score matching or inverse probability weighting
- G estimation and marginal structural models
- Doubly robust methods
- Instrumental variables
- Differences in differences
- Targeted maximum likelihood estimation





We've learned a lot about how to do comparisons correctly

- 1. Active comparator, same treatment modality
- 2. New users
- 3. High-dimensional proxy adjustment
- 4. Control for medication adherence
- 5. Avoiding design flaws:
 - a. reverse causation
 - b. adjustment for causal intermediaries
 - c. immortal time bias
 - d. depletion of susceptibles

Clinical Pharmacology & Therapeutics

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

Jessica M, Franklin¹ and Sebastian Schneeweiss¹

Regulators consider randomized controlled trials (RCTs) as the gold standard for evaluating the safety and effectiveness of medications, but their costs, duration, and limited generalizability have caused some to look for alternatives. Real world evidence based on data collected outside of RCTs, such as registries and longitudinal healthcare databases, can seinetimes substitute for RCTs, but concerns about validity have limited their impact. Greater reliance on such real world data (RWD) in regulatory decision making requires understanding why some studies fail while others succeed in producing results similar to RCTs. Key questions when considering whether RWD analysis can substitute for RCTs for regulatory decision making are WHEN one can study drug effects without randomization and HOW to implement a valid RWD analysis if one has decided to pursue that option. The WHEN is primarily driven by outernatities not controlled by investigatons, whereas the HOW is focused on avoiding isnown mistakes in RWD analyses.

Franklin J. and Schneeweiss S. When and How Can Real World Data Analyses Substitute for Randomized Controlled Trials? Clinical Pharmacology and Therapeutics 2017.



There are a limited and growing number of observational studies replicating RCTs

Observational study followed by RCT:

- Schneeweiss S, Seeger J, Landon J, Walker A. Aprotinin during Coronary-Artery Bypass Grafting and Risk of Death. *NEJM* 358(8), 2008
- Fergusson D, Hebert P, Mazer D, et al. A Comparison of Aprotinin and Lysine Analogues in High-Risk Cardiac Surgery. *NEJM* 358(22), 2008

RCT followed by observational study:

- Connolly S, Ezekowitz M. Yusef S, et al. NEJM. Dabigatran versus Warfarin in Patients with Atrial Fibrillation. 361(12), 2009
- Seeger J, Bykov K, Bartels D, et al. Safety and Effectiveness of Dabigatran and Warfarin in Routine Care of Patients with Atrial Fibrillation. *Thrombosis and Haemostasis* 114(12):1277-89, 2015

Observational study conducted concurrently with RCT:

• Noseworthy PA, Gersh BJ, Kent DM, et al. Atrial fibrillation ablation in practice: Assessing CABANA generalizability. Eur Heart J. 2019 April 21;ehz085.





A high profile case where RCTs and observational studies differed

The Nurses Health Study (observational) had found a protective cardiovascular risk from HRT.

Stampfer MJ et al. Postmenopausal Estrogen Therapy and Cardiovascular Disease: Ten-Year Follow-up from the Nurses' Health Study. N. Engl. J. Med 325, 756-762 (1991).

The Women's Health Initiative (RCT) found just the opposite.

Rossouw JE et al. Risks and Benefits of Estrogen Plus Progestin in Healthy Postmenopausal Women: Principal Results from the Women's Health Initiative Randomized Controlled Trial. JAMA 288, 321-333 (2002)

And subsequent studies revealed the reasons why.

Hernan MA et al. Observational Studies Analyzed Like Randomized Experiments: An Application to Postmenopausal Hormone Therapy and Coronary Heart Disease. Epidemiology 19, 766-779 (2008)

Goodman SN, Schneeweiss S. and Baiocchi M. Using Design Thinking to Differentiate Useful From Misleading Evidence in Observational Research. JAMA 317, 705-707 (2017).

Was randomization the issue?

Study design was the difference.





What is the role of real-world data in regulatory decision making?

OPERAND (Observational Patient Evidence for Regulatory Approval and uNderstanding Disease)

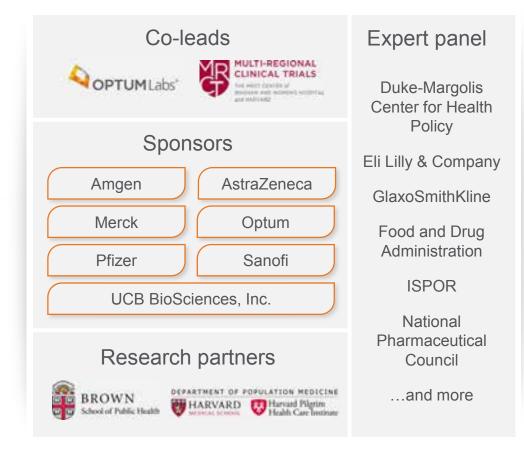
Improve the confidence in observational data to generate evidence supporting treatment effectiveness and safety for patient populations beyond those studied in randomized clinical trials (RCTs).

Approach

- Replicate two clinical trials: ROCKET for atrial fibrillation and Lead-2 for Type 2 diabetes control
- Using OLDW claims and clinical data
- Applying methods expertise
- Engage diverse experts in government, academia, industry to advise the program

Potential impact

- Inform policy on the use of real-world evidence to support regulatory approvals of new drug indications and to satisfy post-approval safety surveillance requirements
- Validation of using observational data to complement evidence from RCTs
- Innovation in clinical trial design, thereby bringing new treatments to market faster and more costeffectively





OPERAND study design

Focus: On-label effectiveness in defined subgroups

Number of teams and trials	Two academic institutions will independently replicate two identical target trials:1. ROCKET for atrial fibrillation2. Lead-2 for Type 2 diabetes control	
Data	 (a) Claims data alone and (b) Claims + EHR, each used for sensitivity analyses Data will be restricted to inclusion and exclusion criteria of pivotal RCT and on-label indication 	
Methodology	Bootstrapping methods along with bias analysis will be used to understand variability in treatment effect estimates	
Documentation	Research team must document assumptions and choices made when emulating trials	
Approach	 To ensure comparability, the teams will: Be given a common clinical question and the study RCT protocol Be given defined set of anticipated methods Have flexibility to use their own methods in certain areas Initially, be restricted to inclusion/exclusion criteria 	





Regulatory agreement

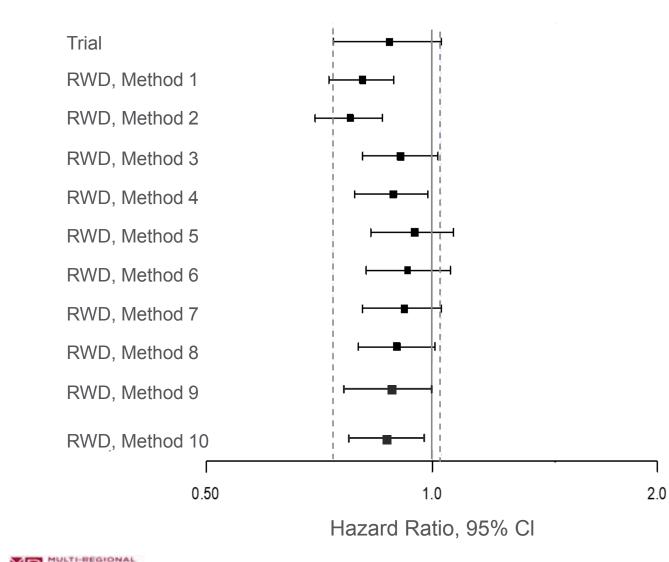
Defined as statistically significant result with directional equivalence between the RCT and observational study.

Estimate agreement

Defined as the point estimate of the observational study falling within the 95% confidence interval of the ATE from the RCT using the reported standard errors of the RCT to define the confidence interval.



Preliminary Results: Distribution of estimates from ROCKET AF Trial and the replication study





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The potential for using supervised machine learning methods

Traditionally machine learning methods focused on prediction and classification — not causal inference

Many methods		
 Classification trees 	 Support vector machines 	
 Random forests 	Ensembles	
 Bagging and boosting models 	Neural networks	
 Ridge, lasso, and elastic net 	And many others	
regression		

Hastie T., Tibshirani R., Friedman J. The Elements of Statistical Learning: Data Mining, Inference, and Prediction. 2nd Edition. New York: Springer.





Is causal inference compatible with machine learning?

There are two paths forward:

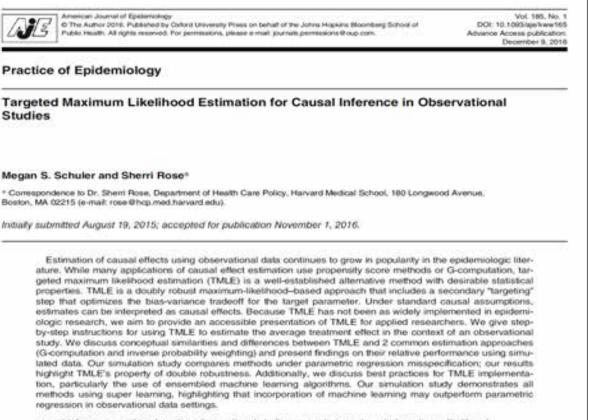
1) Sequential approach

- Estimate prediction/classification models using machine learning techniques to select features
- Estimate causal models with epidemiologic or econometric approaches using selected features in the model specifications
- 2) Targeted Maximum Likelihood Estimation (TMLE)



A snapshot of targeted maximum likelihood estimation

American Journal of Epidemiology



causal inference; machine learning; observational studies; super learner; targeted maximum likelihood estimation





Questions?



Session IV: Methodological and Analytical Considerations for Observational Studies



Join the conversation with **#RWE2019**









Real World Evidence from Healthcare Databases: We have come a long way

Sebastian Schneeweiss, MD, ScD Professor of Medicine and Epidemiology

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

October 2019

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- This study was funded in part by the NHLBI
- Additional funding came from PCORI

Disclosures

- PI, Harvard-Brigham & Women's Hospital Drug Safety Research Center (FDA)
- Co-Chair, Methods Core of the FDA Sentinel System
- Co-Chair, Partners Center for Integrated Healthcare Data Research
- Pl of research grants awarded to BWH by Bayer, Vertex, Boehringer Ingelheim
- Consulting fees from WHISCON, LLC, and Aetion, Inc. (incl. equity)
- Grants/contracts from NIH, AHRQ, PCORI, FDA, IMI, Arnold Foundation



Reminder: Why we love RCTs





Random treatment assignment

Controlled outcome measurement

Easy to understand and communicate

And how we get to causal associations with RWE

	A CONTRACTOR OF CONTRACTOR			
	internal control group	External control group		
Study question- dependent	1. Outcome measurable	1. Outcome measurable		
	 Active comparator preferred Key confounders measured 	Key prognostic factors measured at equal quality as treatment arm		
	2. MJ MARKANI MARKAN	3. Highly predictable disease progression		
		 Settings that make external control groups more acceptable* 		
How to do data	base studies?			
	4. Proceed if			
Data	 a) Outcome observat each treatment gr 	sle with specificity and defined similarly in sup		
dependent -	b) Sufficient outcome	b) Sufficient outcome surveillance		
878727C34C7	c) Sufficient statistica	I power to detect clinically-meaningful effect		
	d) Sufficient patient s	imilarity is reached		
	5. Avoid known design an	d analytic flaws		
	a) Avoid immortal tin	ne blas		
	b) Avoid adjusting for	b) Avoid adjusting for intermediates		
1000000000	c) Avoid reverse caus	ation		
Investigator controlled =	d) Deal with time-var	d) Deal with time-varying hazards		
	6. Do robustness checks			
	a) Negative/positive	controls		
	b) Check balance of s	nmeasured factors in patient subset		
		s across multiple databases, ernal control groups		
Quality assurance	7. Use software develope	d for RWD analyses		
	a) Avoids design flaws			
	b) Increases transpare	ncy		
	c) Stores audit trails			

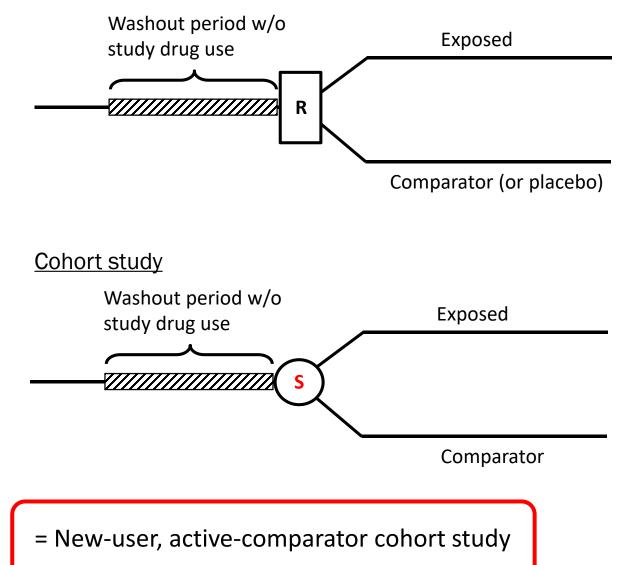
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Franklin, Glynn, Martin, Schneeweiss, CP&T 2019



Causal study designs: Contemplate the target trial

Parallel group RCT



1) Why do we like new user cohort studies?

- Patients at a clear inception point
- Confounders measured <u>before</u> exposure
- Compatible with propensity score analyses
- Allows to describe time-varying hazards
- Also reduces the risk of immortal time

2) Why do we like active comparators?

Patients are more similar

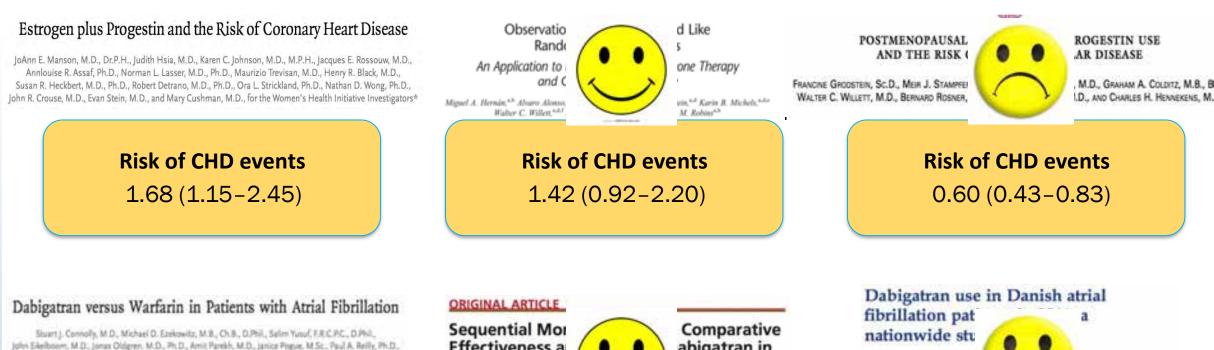


RCT

RW New users F

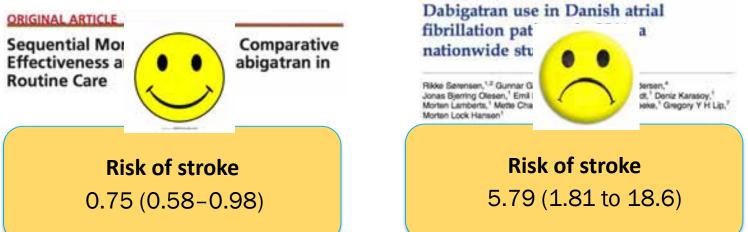
Current users





John Ekelboom, M.D., Jonas Oldgren, M.D., Ph.D., Amit Parekh, M.D., Janice Progue, M.Sc., Paul A. Belly, Ph.D., Ellison Themeles, B.A., Jeanne Varione, M.D., Susan Wang, Ph.D., Marco Alings, M.D., Ph.D., Denis Xavier, M.D., Jun Zhu, M.O., Rafael Olaz, M.D., Basil S. Lewis, M.D., Harald Darius, M.O., Hara-Christoph Diener, M.D., Ph.D., Campbell D. Joyner, M.D., Lars Wallenon, M.D., Ph.D., and the RE-LY Steering Committee and Investigators*

Risk of stroke 0.66 (0.53–0.82)







÷.



range of cholesterol levels

The Prospective Pravastatin Pooling project

Risk of death (any)

0.78 (0.68-0.89)

RW Active comparatpr



O MRC/BHF Heart Protection Study of cholesterol lowering with simvastatin in 20 536 high-risk individuals: a randomised placebocontrolled trial

Heart Protection Study Collaborative Group*

Risk of hip fracture 1.05(0.88 - 1.25)

2019 Harvard / Brigham Division of Pharmacoepidemiology

Non-user comparator



How to ...



- 4. Proceed if
 - a) Outcome observable with specificity
 - b) Sufficient outcome surveillance
 - c) Sufficient patient similarity is reached¹⁾

5. Avoid known design and analytic flaws

- a) Avoid immortal time bias
- b) Avoid adjusting for causal intermediates
- c) Avoid reverse causation
- d) Deal with time-varying hazards
- 6. Do robustness checks
 - a) Negative/positive controls
 - b) Check balance of unmeasured factors

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Franklin, Glynn, Martin, Schneeweiss, CPT 2019

Investigator

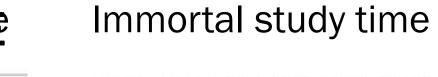
controlled

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RCT

RW No immortal time







Canagliflozin and Cardiovascular and Renal Events in Type 2 Diabetes

Bruce Neal, M.B., Ch.B., Ph.D., Vlado Perkovic, M.B., B.S., Ph.D., Kenneth W. Mahaffey, M.D., Dick de Zeeuw, M.D., Ph.D., Greg Fulcher, M.D., Ngozi Erondu, M.D., Ph.D., Wayne Shaw, D.S.L., Gordon Law, Ph.D., Mehul Detai, M.D., and David R. Matthews, D.Phil., B.M., B.Ch., for the CANVAS Program Collaborative Group*

> **Risk of death (any)** 0.87 (0.74-1.01)





Transparency in process and implementation



Real-World Evidence of Treatment Effects: The Useful and the Misleading

Sebastian Schneeweiss^{1,*}

Turning real-world data (RWD) analyses into real-world evidence (RWE) requires accurate estimation of causal treatment effects; to convince its critics, advocates of RWE will need to get this right, reliably and predictably. This may sound like a high bar. However, if we are tired of seeing RWE categorically disregarded, we need to acknowledge that there are flawed RWD analyses and identify tools to quickly and confidently discriminate between actionable RWE and erroneous RWE.

- Transparency of implementation
 - Protocol + registration
- Reproducibility of implementation
- Validity/robustness of findings

BWH



... as it does not clarify whether the indented study was implemented accurately

Nothing wrong with sharing programming code but is not helpful...

* benzo meds	options ps = 54 h = 72 obs = max;	
%macro hosp:	Boname da '/PHShome/H037/Jd_282_hypnobc/';	data romane;
%do i = 2004 %to 2012;	Ibname out '/PitShome/rI037/id_282_hypnotic/united':	set prior(rename=(dx = iCD));
data medsál	ktiname.ndc '/netappil/app/home1/ndc';	disease = 'nopoints';
set in dispensing &i(rename=(rxdate = startdt));	Ibname in spde '/storage1/cdm_data/M5_OPTUM_FULL';	if substr(ICD, 1,3) = '410' or substr(ICD, 1,3)='412'
		then disease = 'mi';
class = put(ndc,\$study.);	døta ids;	그 것 같아. 봐야 한 것 같은 것이 있다. 것 같아. 한 것 이 것 같아. 것
if class *= 'other';	set out.kfs;	if NCD = '40201' or NCD = '40211' or NCD = '40291' or
keep patid startdt class ndc;	knep patid indexit;	substr(iCD, 1, 4) = '4299' or substr(iCD, 1, 3) = '425' or
run;	runs	substr(ICD, 1, 8) = '428' then disease = 'ch/F;
proc sort nodup;	procisort;	if substr(ICD,1,3) = '440' or substr(ICD,1,3) = '441' or
by patid ndc startdt,	by partid indexdl;	substr(ICD,1,3) = '442' or substr(ICD,1,3) = '443' or
run;	runc.	substr(ICD,1,4) = '4471' or substr(ICD,1,4) = '7854'
%end,		then disease = 'per';
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data meds2013,	%do year = 2004 %to 2012;	substr(iCD,1,3) = '431' or substr(iCD,1,3) = '432' or
set in dispensing_2013a(rename=(rxdate = startd	data daßvear;	substr(iCD,1,3) = '433' or substr(iCD,1,3) = '434' or
in dispensing 2013b(rename=(nidate = startdt)	merge in diagnosis. Ayear(in = in2 keeps patid adate da)	substr(0CD,1,3) = '435' or substr(0CD,1,3) = '436' or
class = put(ndc,\$study.);	ids(in = in1);	substr(iCD,1,4) + '437 ' or substr(iCD,1,4) + '4371' or
if class *= 'other'	by petid:	substr(iCD,1,4) = '4370' or substr(iCD,1,4) = '4379' or
keep patid startdt class ndc;	if int and in2;	substr(900,1,3) = '436' or substr(900,1,4) = '7814' or
nun:	if (indexdt - 180) <= adata < (indexdt);	substr(000,1,4) = '7843' or substr(000,1,4) = '9970'
proc sort nodup.	keep patid indexift ds ;	then disease = 'strake';
by patid ndc startdt;	0.00	# substr()CD,1,4) = '\$31 ' or substr()CD,1,4) = '\$310' or
Tun:	procisort redupling	substr(ICD,1,4) = '3311' or substr(ICD,1,4) = '3312' or substr(ICD,1,3) = '290' then disease = 'dem';
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set %do i = 2004 %to 2013;	nurc	<pre>if substr(ICD,1,4) = '4150' or substr(ICD,1,4) = '4168' or substr(ICD,1,4) = '4169' or substr(ICD,1,3) = '491' or</pre>
medsāi	Nent	substr(KD,1,3) = '492' or substr(KD,1,3) = '493' or
Siend.	data de2013a:	substr(#C0,1,3) = '496' or substr(#C0,1,3) = '496'
neeros,	merge in diagnosis, 2013ajin + in2 keep+ patid adate dxj	then disease = 'copd')
	idión = in1);	if substr(iCD,1,3) = '710' or substr(iCD,1,3) = '714'
nun;	ty patid;	then disease = 'rheum':
%mend hosp;	if ind and ind:	if substr(iCD,1,3) = "531" or substr(iCD,1,3) = "532" or
Nhosp;	if (indexit) - 190) <> adate < (indexit);	substr(iCD,1,8) = '583' or substr(iCD,1,8) = '584'
		then disease = 'pod';
proc sort nodupkey data = meds,	keep patid indeadt de ;	if substr(iCD,1,4) = '5712' or substr(iCD,1,4) = '5715' or
by patid starkit ridic;	nun	substrik[0,1,4] = '\$716' or substrik[0,1,4] = '\$718' or

⇒ Line programming for healthcare database analytics Lacks transparency Lacks reproducibility against intended protocol

on of Pharmacoepidemiology ואיז הווצרים (Intervalue) וויש



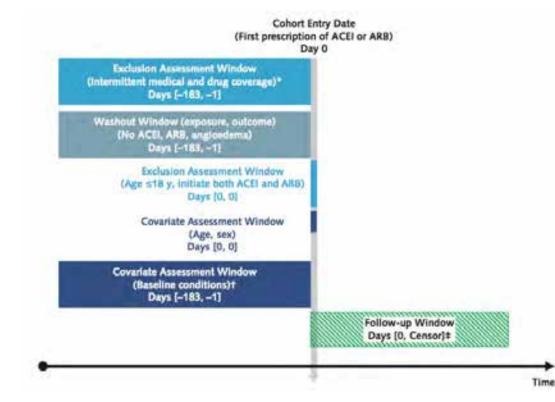
Making it easier for decision makers to fully understand RWE



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191

Longitudinal design visualization



Annals of Internal Medicine RESEARCH AND REPORTING METHODS

Graphical Depiction of Longitudinal Study Designs in Health Care Databases

Sebastian Schneeweist, MD, ScD; Jeremy A. Rassen, ScD; Jeffrey S. Brown, PhD; Kenneth J. Rothman, DrPH; Laura Happe, PharmD, MPH; Peter Arlett, MD; Gerald Dal Pan, MD, MHS; Wim Goettsch, PhD; William Muck, PhD; and Shirley V. Wang, PhD

Study design parameter table

Specifications for protocol: Example 1 Drug A versus Drug B Not Proof Deb Searce Date Modeline Descence at these Represent Sear Oracle Deb Verses Sear Oracle Deb Verses		Information about data source and software					
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Wang et al. in preparation with an FDA-HTA-industry consortium

2019 Harvard / Brigham Division of Pharmacoepidemiology



Reporting to Improve Reproducibility and Facilitate Validity Assessment for Healthcare Database Studies V1.0



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Shirley V. Wang^{1,2} I Sebastian Schneeweiss^{1,2} | Marc L Berger³ | Jeffrey Brown⁴ | Frank de Vries⁵ | Ian Douglas⁶ | Joshua J. Gagne^{1,2} | Rosa Gini⁷ | Olaf Klungel⁸ | C. Daniel Mullins⁹ | Michael D. Nguyen¹⁰ | Jeremy A. Rassen¹¹ | Liam Smeeth⁶ | Miriam Sturkenboom¹² | on behalf of the joint ISPE-ISPOR Special Task Force on Real World Evidence in Health Care Decision Making

TABLE 2 Departing specific parameters to increase specducibility of database studies







International Society for Pharmacoeconomics and Outcomes Research

	Description	Example	Synonym	s .		
A. Reporting on data se	ource should include:					
	Data source name and name of or	vanization Medicaid	Analytic Extracts data covering 50			
	that provided data.	D. Reporting on exposu	re definition should include:			
A.2 Data extraction date (DED)	The date (or version number) who extracted from the dynamic rav data stream (e.g. date that the	D.1 Type of exposure	The type of exposure that is captured or measured, e.g. drug versus procedure, new use, incident, prevalent, cumulative, time- varying.	We evaluated risk of outcome Z following incident exposure to drug X or drug Y. Incident exposure was defined as beginning on the day of the first dispensation for one o		
A.3 Data sampling	for research use by the vendor The search/extraction criteria app source data accessible to the n subset of the data available fro	D.2 Exposure risk window (ERW)	The ERW is specific to an exposure and the outcome under investigation. For drug exposures, it is equivalent to the time between the minimum and maximum	these drugs after at least 180 days without dispensations for either (SED). Patients with incident exposure to both drug X and drug Y on the same SED were excluded. The		
A.4 Source data range (SDR)	Source data range The calendar time range of data u		hypothesized induction time following ingestion of the molecule.	exposure risk window for patients with Drug X and Drug Y began 10 days after incident exposure and continued until 14 days past		
		D.2a Induction period ¹	Days on or following study entry date during which an outcome would not be counted as "exposed time" or "comparator time".	the last days supply, including refills. If a	Blackout period	
		D.2b Stockpiling ¹	The algorithm applied to handle leftover days supply if there are early refills.	that the full days supply from the initial dispensation was counted before the days supply from the next dispensation was		
		D.2c Bridging exposure episodes ¹	The algorithm applied to handle gaps that are longer than expected if there was perfect adherence (e.g. non-overlapping dispensation + day's supply).	tallied. Gaps of less than or equal to 14 days in between one dispensation plus days	Episode gap, grace period, persistence window, gay days	



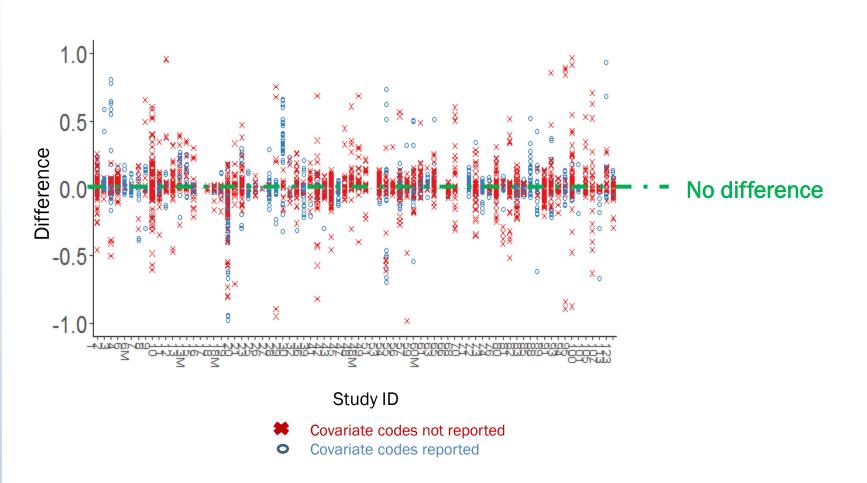
Replicating 150 database studies



Differences in binary/categorical characteristics* of cohort (publication – replication)









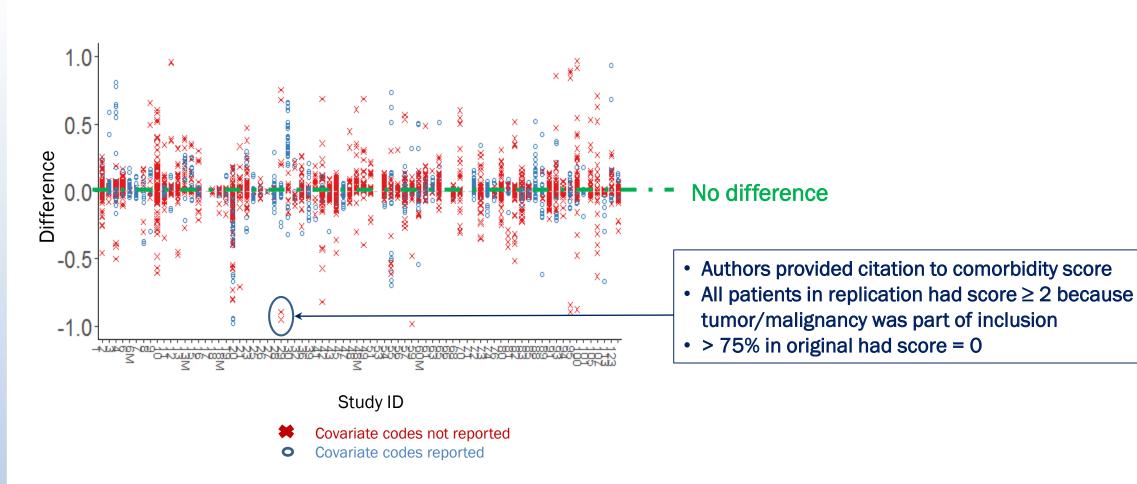
Replicating 150 database studies



Differences in binary/categorical characteristics* of cohort (publication – replication)









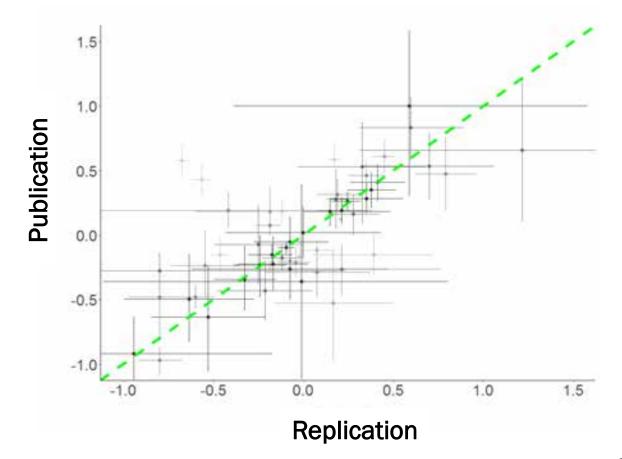
Effect Size and Confidence Limits







• Correlation coefficient = 0.74







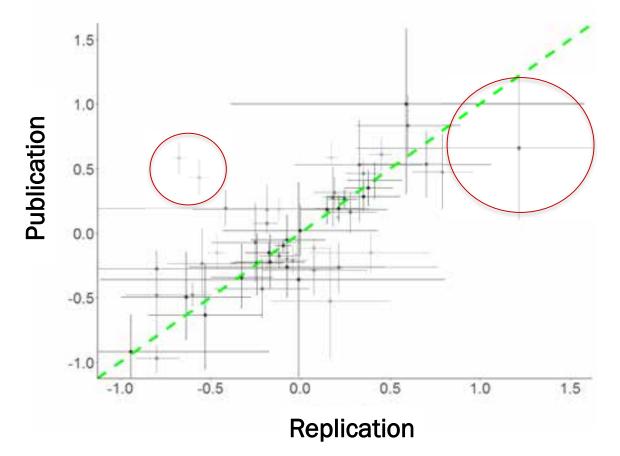
Effect Size and Confidence Limits



*



• Correlation coefficient = 0.74

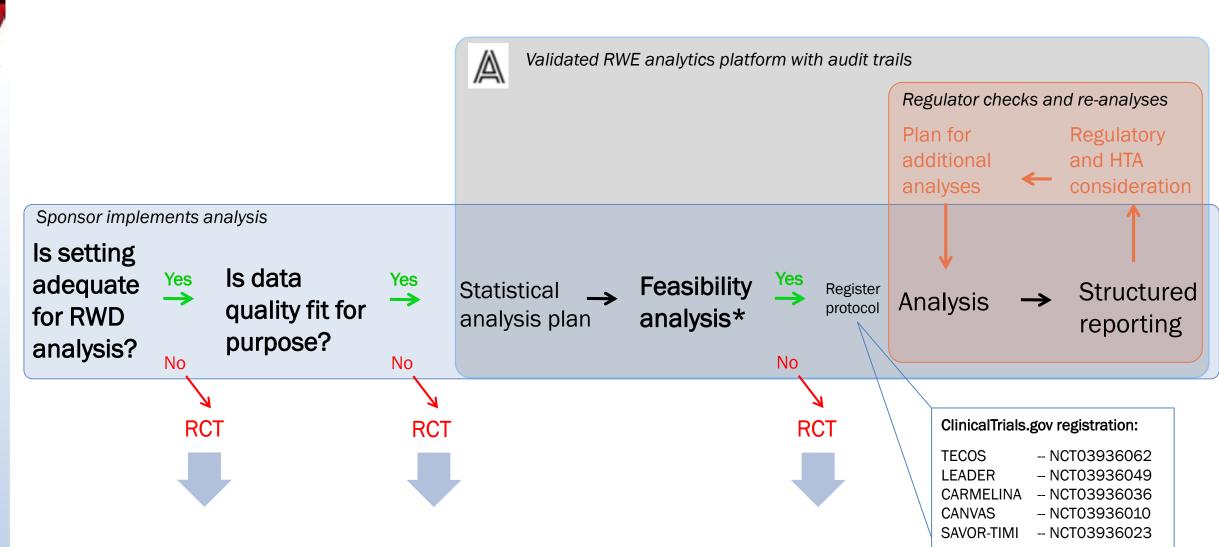






*

A pathway with regulatory validation



Franklin, Glynn, Martin, Schneeweiss. CPT 2019

* Feasibility analysis can include 1) checking covariate balance after applying the chosen confounding adjustment strategy, 2) checking statistical power, 3) evaluating positive or negative control outcomes, and 4) other analyses, *without* evaluating the study outcomes in the two treatment groups.



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Phase 1

How well can RWD analyses reproduce RCT findings?

1



Document exclusions: Limited RWD, Key Select target measurements missing, Extremely strong RCTs confounding etc. ... RWD study infrastructure: Scalable RWD Set up scalable infrastructure **RWD** analytics platform Phase 3 Phase 2 Quantify accuracy of RWD studies Expert group Reproduce guidance **RCTs with RWD** 5 1 A 100

List of RCTs to be

reproduced with RWD

Franklin, Pawar, Martin, Glynn, Levenson, Temple, Schneeweiss. CP&T 2019

Process

Candidate

RCTs

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Database Study

BRIDGING DIABETES RESEARCH WITH GROUNDBREAKING DISCOVERIES

VERVES 79 SESSIONS

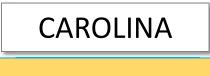


Using Real-World Data to Predict Findings of an Ongoing Phase IV Cardiovascular Outcome Trial: Cardiovascular Safety of Linagliptin Versus Glimepiride Elisobetta Patorno,¹ Sebastian Schneeweixs,¹ Chandrasekar Gopalakrishnan,¹ David Martin,² and Jessica M. Franklin¹ followed by

RCT

Design and baseline characteristics of the CARdiovascular Outcome Trial of LINAgliptin Versus Glimepiride in Type 2 Diabetes (CAROLINA®)

Nikolaus Marx¹, Julio Rosenstock², Steven E Kahn³, Bernard Zinman⁴³, John J Kastelein⁴, John M Lachin⁷, Mark A Espeland⁸, Erich Bluhmki⁹, Michaela Mattheus¹⁰, Bart Ryckaert¹¹, Sanjay Patel¹², Odd Erik Johansen¹³ and Hans-Juergen Woerle¹⁰



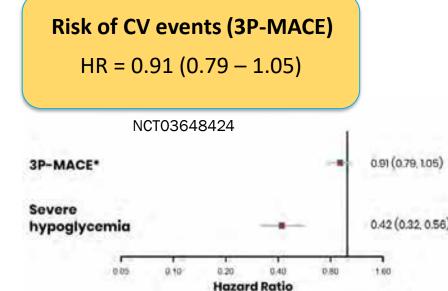
Risk of CV events (3P-MACE)

HR = ???

NCT01243424



PI: Franklin, Schneeweiss



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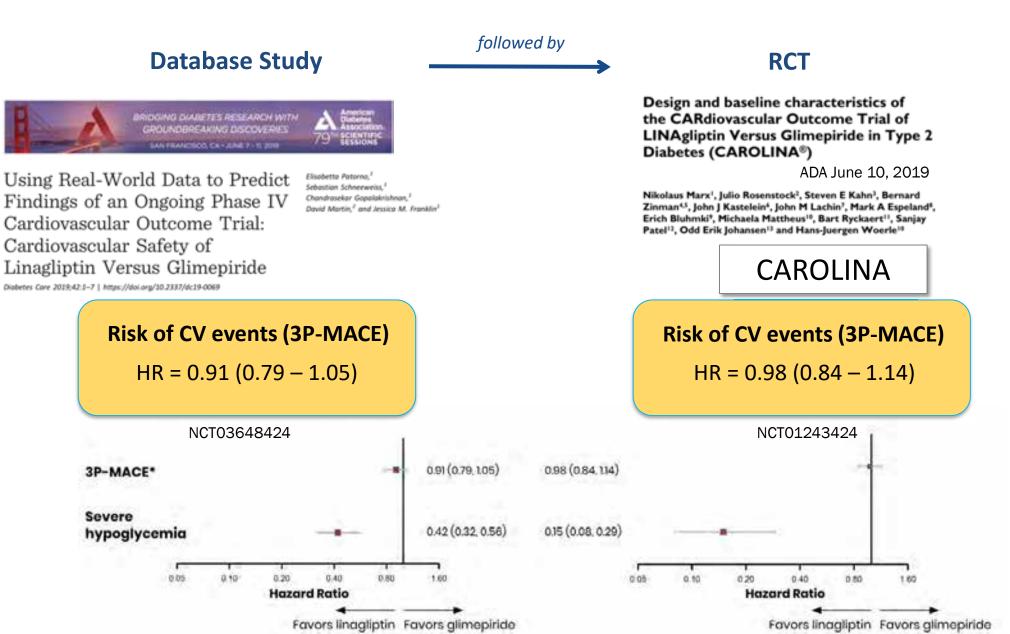
Favors linagliptin Favors glimepiride



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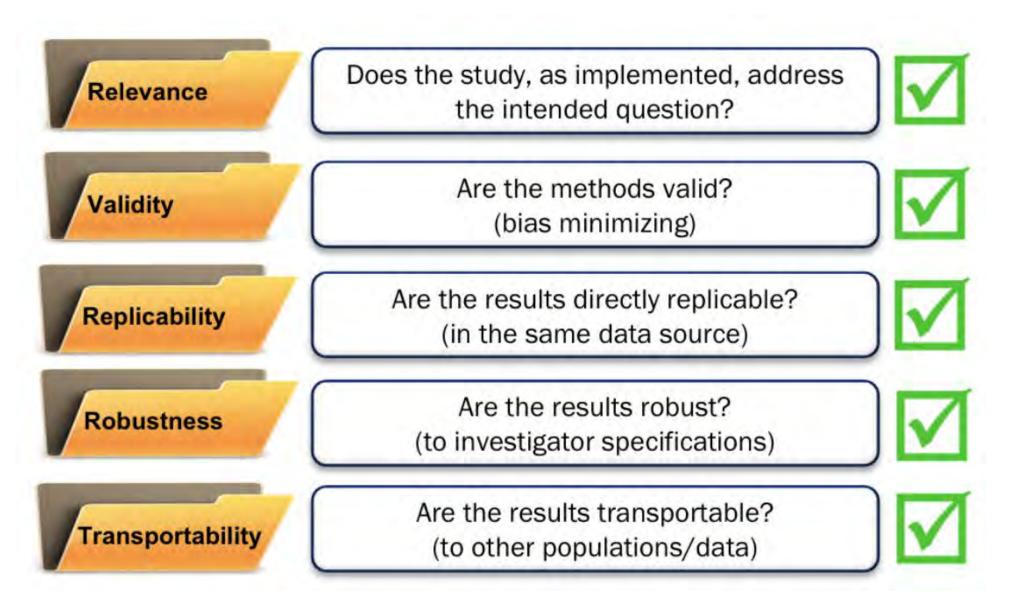
Patorno E. et al. Diab Care 2019;42: June 14 epub

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Independent Evidence Dossiers for decision makers?



Session IV: Methodological and Analytical Considerations for Observational Studies





Substantial Evidence of Effectiveness Consists of Adequate and Well-Controlled Clinical Investigations

Summary of Essential Characteristics of Adequate and Well-Controlled Investigations - 21 CFR 314.126

- 1 There is a clear statement of the objectives of the investigation and a summary of the proposed or actual methods of analysis in the protocol for the study and in the report of its results.
- 2 The study uses a design that permits valid comparison w/ a control to provide a quantitative assessment of drug effect.
- 3 The method of selection of subjects provides adequate assurance that they have the disease or condition being studied, or evidence of susceptibility and exposure to the condition against which prophylaxis is directed.
- 4 The method of assigning patients to treatment and control groups minimizes bias and is intended to assure comparability of the groups with respect to pertinent variables, such as age, sex, severity of disease, duration of disease, and use of drugs or therapy other than the test drug. Ordinarily...assignment is by randomization.
- 5 Adequate measures are taken to minimize bias on the part of the subjects, observers, and analysts of the data.
- 6 The methods of assessment of subjects' response are well-defined and reliable.
- 7 There is an analysis of the results of the study adequate to assess the effects of the drug. The report of the study should describe the results and the analytic methods used to evaluating them, including any appropriate statistical methods. The analysis should assess...the comparability of test and control groups with respective to pertinent variables.

Analytical Methods for Addressing Unmeasured Confounding in Observational Studies of Treatment Effectiveness

- Standard bias control methods assume "no unmeasured confounding"
- Will unmeasured confounder(s) be strong enough to create bias based on quantitative assessment?
- If yes, then conduct sensitivity analysis to evaluate the impact of unmeasured confounding

No information on unmeasured confounder(s)

Plausibility assessment set I:

Negative control Pseudo treatment Manski's partial identification Empirical distribution calibration

Adjusted analysis set I:

Instrumental variable Regression discontinuity Difference in difference method Missing cause approach Trend-in-trend method Perturbation variable Internal information on unmeasured confounder(s)

Plausibility assessment set II: Plausibility assessment set I

Rosenbaum-Rubin sensitivity analysis Rosenbaum sensitivity analysis

Adjusted analysis set II:

Adjusted analysis set I + Bayesian twin regression Multiple imputation Propensity score calibration External information on unmeasured confounder(s)

Plausibility assessment set III: Plausibility assessment set I

Rosenbaum-Rubin sensitivity analysis Rosenbaum sensitivity analysis

Adjusted analysis set III:

Adjusted analysis set I + Bayesian twin regression Propensity score calibration

Zhang X, Faries DE, Li H, Stamey JD, Imbens GW. Pharmacoepidemiology and Drug Safety, 2018; 27(4):373-382,

Session IV: Methodological and Analytical Considerations for Observational Studies











Session V: Opportunities to Ascertain Endpoints in Routine Clinical Care Settings





rwEndpoints Use Case: Assessing Frontline Treatment Regimens in Realworld Patients with Advanced Non-Small Cell Lung Cancer

Jeff Allen, PhD

Friends of Cancer Research



Background and Pilot 1.0 Findings

Initial Pilot Project Focus:

- Evaluated the performance of real-world endpoints across multiple data sets by focusing on a common question: What outcomes can be evaluated for advanced NSCLC (aNSCLC) patients
- Can real-world endpoints be used to accurately characterize differences between available interventions?
- Can further alignment on data quality and standards be used to develop an analytic framework to evaluate real world endpoints?

treated with immune checkpoint inhibitors from diverse RWD sources.

Several extractable endpoints from EHR and claims data correlate with OS. Survival among patients
as assessed through EHR and claims data fall within the range of median OS values observed in
several immune checkpoint inhibitor trials.



Pilot 2.0: Establishing a Framework to Evaluate Real-World Endpoints

Project Goals: Explore potential endpoints that may be fit for assessing long term benefits of a product compared to an existing alternative			
<u>Project Focus</u>	What is the ability of different real-world endpoints (rwOS, rwTTD, rwTTNT, and rwPFS) to reflect effectiveness previously observed in clinical trials across two frontline treatment pairs in advanced non-small cell lung cancer (aNSCLC) patients?		
<u>Research Objectives</u>	 Objective 1: Description of demographic and clinical characteristics of patients with aNSCLC receiving Frontline doublet chemotherapy, PD-(L)1 monotherapy; or PD-(L)1 + doublet chemotherapy. Objective 2: Evaluate and compare rwOS, rwTTD, rwTTNT, and rwPFS among select frontline therapy pairs in aNSCLC patients: Doublet chemotherapy versus PD-(L)1 monotherapy Doublet chemotherapy versus PD-(L)1 monotherapy Doublet chemotherapy versus PD-(L)1 + doublet chemotherapy 		
<u>Study Design</u>	This is a retrospective observational analysis of data derived from electronic health record (EHR) and claims based databases. The datasets generated for the study will include all relevant, retrospective patient-level HIPAA-compliant de-identified data available for eligible individuals up to a single specific data cutoff date of March 31, 2018.		
Data Partners	ASCO CancerLinQ/Concerto HealthAI, COTA, Flatiron Health, IQVIA, Kaiser Permanente/CRN, Mayo Clinic/OptumLabs [®] , McKesson, SEER, Syapse, and Tempus		



Real-World Endpoint Assessment

Real-world derived endpoint definitions

Overall survival (OS)

• Data definition / computation: Length of time from the index date to the date of death, or disenrollment, or last structured recorded clinical activity within the network or prescription, office or institutional billing claims data, or end of follow-up period, whichever occurs earliest. For claims data, health plan disenrollment date are incorporated if deaths are not captured among those who leave health plan coverage.

Time to Next Treatment (TTNT)

• Data definition / computation: Length of time from the index date to the date the patient received an administration of their next systemic treatment regimen or to their date of death if there is a death prior to having another systemic treatment regimen.

Time to Treatment Discontinuation (TTD)

• Data definition / computation: Length of time from the index date to the date the patient discontinues frontline treatment. The frontline treatment discontinuation date is defined as the last administration or non-cancelled order of a drug contained within the same frontline regimen.

Definition of progression in aNSCLC as evident in the EHR

A **progression event** is a distinct episode in which the treating clinician concludes that there has been growth or worsening in the aNSCLC. The progression event (and date) is based on review of the patient chart.

Progression Free Survival (PFS)

• Data definition / computation: Length of time from the date the patient initiates frontline treatment (from the date the patient received administration for the first product in their frontline treatment) to the date of a rwP event, at least 14 days after frontline treatment initiation, or death. For patients without a rwP event prior to TTNT, rwPFS will be censored at the date of rwTTNT. For patients without a rwP event or a rwTTNT event and at least 180 days follow-up from last frontline treatment, rwPFS will be censored at rwTTD. Patients with a rwP event within 14 days from frontline treatment initiation will be excluded.

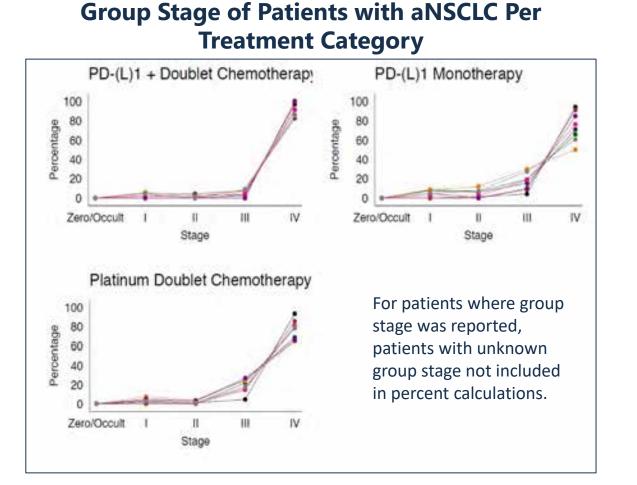


Demographic and Clinical Characteristics

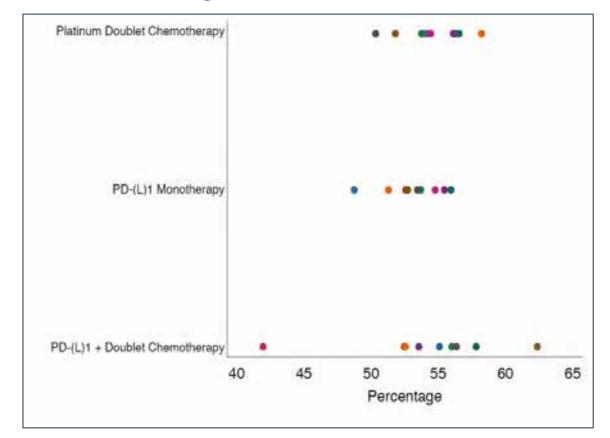
FRIENDS

of CANCER

RESEARCH



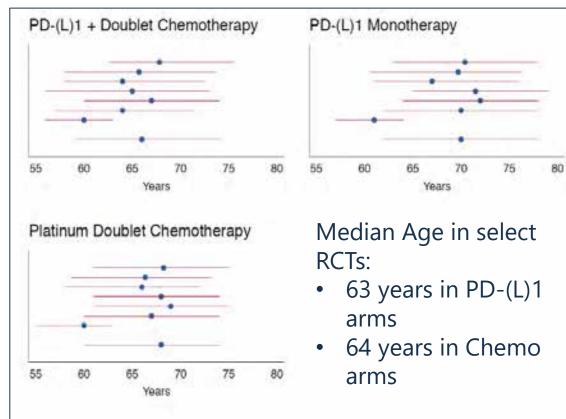
Percentage of Male aNSCLC Patients



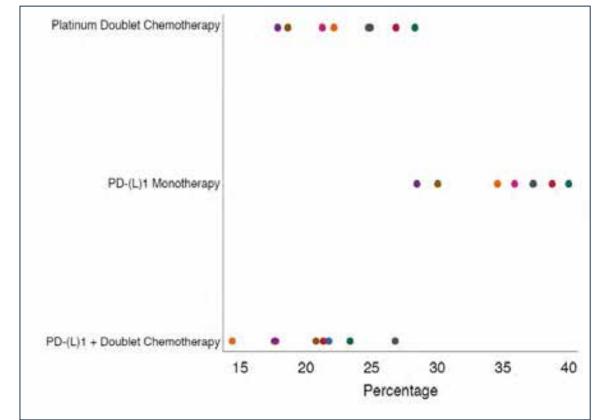
- Graphs are based on structured or unstructured information depending on the data source
- Graphs represent data of patients with values reported.
 Missing/unknown data are not represented in these graphs

Demographic and Clinical Characteristics

Median and Lower/Upper Quartiles of Age at Index



Percentage of aNSCLC Patients Age 75 or Older at Index

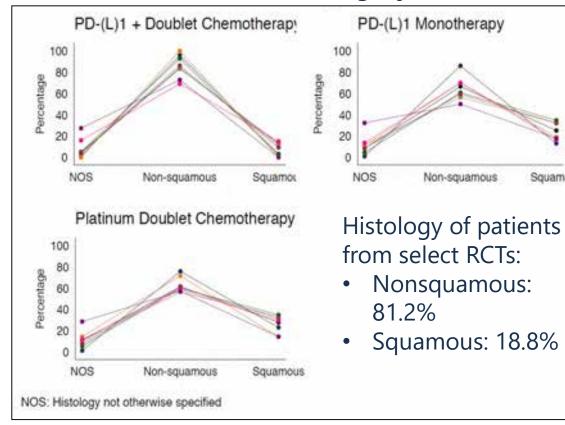




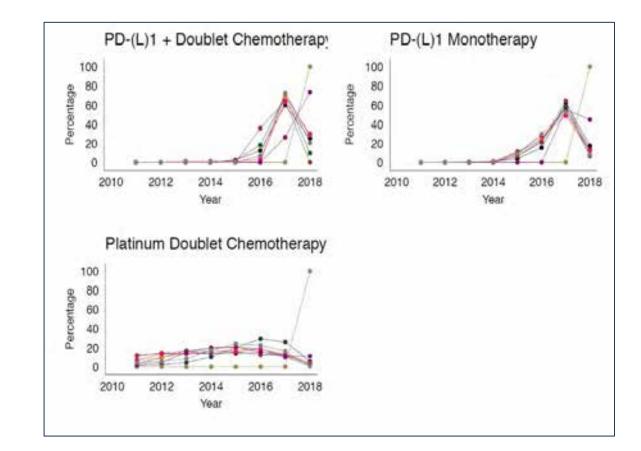
Demographic and Clinical Characteristics

Squamous

Histology of Patients with aNSCLC Per **Treatment Category**

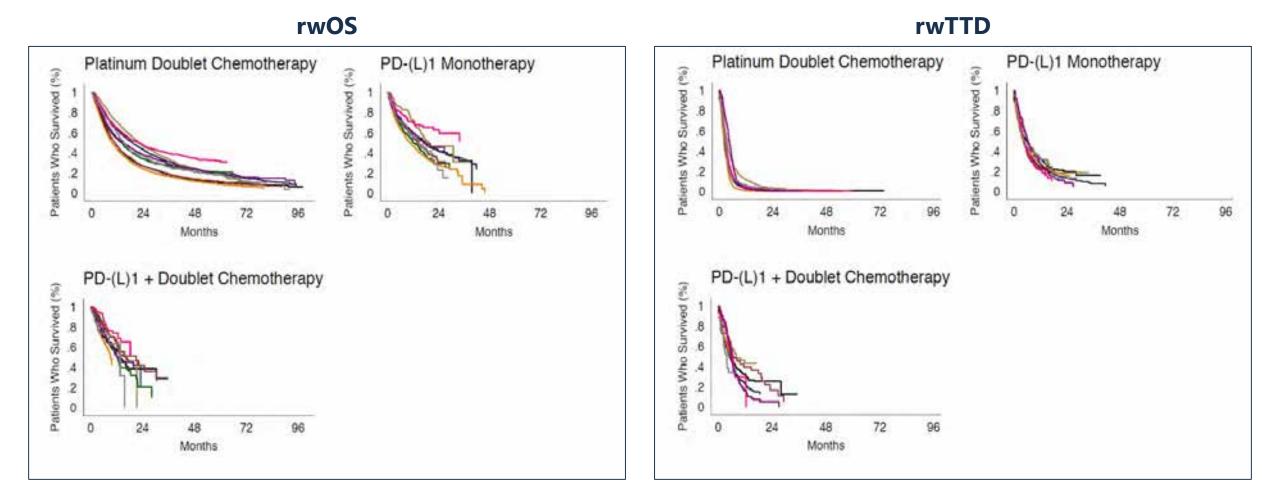


Year of Index Date Per Treatment Category



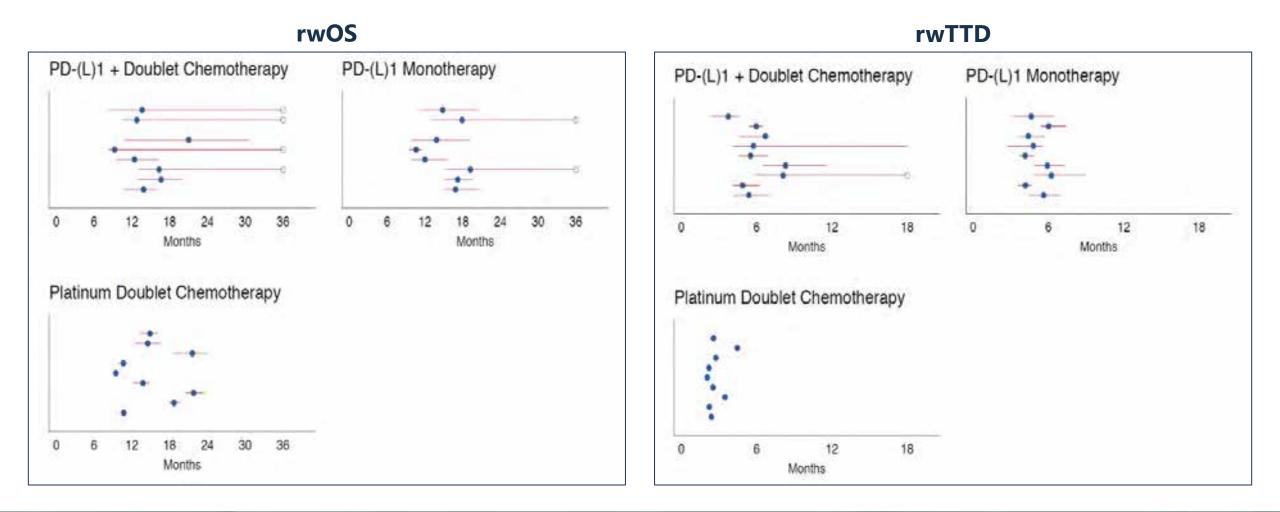


Kaplan Meier Curves per Treatment Group



FRIENDS of CANCER RESEARCH

Estimates of Median Time per Treatment Category





Conclusions

- It is possible to coordinate the efforts across numerous real-world oncology data organizations to reach high-level alignment on important data elements and definitions for real-world endpoints in the context of a focused research question.
- The depth of data varied across data providers and distinct characteristics were identified among the cohorts provided by each organization, likely attributable to the characteristics of the data source and the underlying population it is capturing.
- The results of this phase of the pilot project highlighted the ability to show differences in important prognostic demographic as well as clinical characteristics between trial patients and heterogenous real-world patient populations (e.g., median age, histology).
- It also demonstrated the ability to provide insight into recent trends in clinical care.



Next Steps

- Carefully review data and assess potential differences in the population characteristics, data source, and/or subtle differences in methodological assumptions made during the analysis that could impact outcomes
- Evaluate Treatment effect size in frontline therapy regimens using real-world endpoints
 - Stratified analyses: PD-(L)1 status, other patient demographics
- Conduct analysis among real-world patients that match RCT eligibility requirements in order to assess comparability to clinical trial populations. Such analyses may:
 - Help identify sources of variability data source, treatment settings, provider level variation
 - Model methodology for potential data quality control
 - Inform a framework to assess performance of real-world endpoints



Acknowledgements

Pilot 2.0 Data Partners

- ASCO CancerLinQ/Concerto HealthAl
- **COTA**
- Flatiron Health
- IQVIA
- Kaiser Permanente/Cancer Research Network
- Mayo Clinic/OptumLabs®
- McKesson
- SEER-Medicare Linked Database
- Syapse
- Tempus

Key Collaborators

- FDA
- NCI

Data Analytics and Graph Generation

Aetion



Session V: Opportunities to Ascertain Endpoints in Routine Clinical Care Settings





Open Comment Period















