



# Analysis and interpretation of real-world data: a 5-year outlook

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# Disclosure

Opinions are my own, and do not necessarily reflect those of Janssen R&D, Columbia University or OHDSI community



### Real-World Evidence in EU Medicines Regulation: Enabling Use and Establishing Value

Peter Arlett<sup>1,\*</sup>, Jesper Kjær<sup>2</sup>, Karl Broich<sup>3</sup> and Emer Cooke<sup>1</sup>

**We outline our vision that by 2025 the use of real-world evidence will have been enabled and the value will have been established across the spectrum of regulatory use cases. We are working to deliver this vision through collaboration where we leverage the best that different stakeholders can bring. This vision will support the development and use of better medicines for patients.**

Real-world data (RWD) and real-world evidence (RWE) are already used in the regulation of the development, authorization, and supervision of medicines in the European Union. Their place in safety monitoring and disease epidemiology are well-established while their evidentiary value for additional use cases, notably for demonstrating efficacy, requires further evaluation.<sup>1</sup> During the coronavirus disease 2019 (COVID-19) pandemic, RWE rapidly provided impactful evidence on drug safety, vaccine safety, and effectiveness and we were reminded of the importance of robust study methods and transparency.<sup>2</sup> Our vision, anchored in the European Medicines Regulatory Network (EMRN) strategy to 2025, is that by 2025 the use of RWE will have been enabled and the value will have been established across the spectrum of regulatory use cases.<sup>3</sup> Delivering this vision will support the development and use of better medicines for patients.

In December 2018, the US Food and Drug Administration (FDA) published its framework for RWE underpinned by three pillars: whether RWD are fit for use, whether the study design can provide adequate evidence, and whether the study conduct meets regulatory requirements.<sup>4</sup> In 2019 in the European Union, we published the OPTIMAL framework for RWE also consisting of three pillars: operational, technical, and methodological.<sup>5</sup> More recently, the EU approach places RWE in the wider context of big data and is guided by the priority recommendations of the Big Data Task Force. These recommendations are being implemented through the Big Data Steering Group and the second multi-annual work plan was published in August 2021.<sup>6</sup> Figure 1 represents the workplan with its 11 workstreams which will deliver our vision for RWE by 2025. The workplan places emphasis on collaboration across stakeholders and with international

regulatory partners. This work also needs to be seen in the wider EU policy context, most notably the European Commission's plans for a European Health Data Space.<sup>7</sup>

Acknowledging different frameworks to conceptualize the challenges and opportunities of RWE, we believe the two main priorities for the European Union are to enable its use and establish its value for regulatory decision making. The EMRN is working to deliver on both priorities through a collaborative approach where we leverage the best that different stakeholders can bring, and where those stakeholders can complement the central role of industry in generating evidence.

#### ENABLING USE

To enable use, we are working on multiple fronts with our stakeholders, including patients, healthcare professionals, industry, regulatory and public health agencies, health technology assessment bodies, payers, and academia. We are initiating work to establish a data quality framework, not just for RWD but for all data used in regulatory decision making. We are striving to improve the discoverability (findability) of RWD through agreement of metadata for RWD and through a public catalogue of RWD sources<sup>8</sup> that builds on the early work of the European Network of Centres for Pharmacoeconomics and Pharmacovigilance (ENCePP). The ENCePP Guide on Methodological Standards in Pharmacoeconomics,<sup>9</sup> extensively updated in 2021, is the core of our efforts to drive up the standards of study methods for RWE, and this is complemented by recently published guidance on conducting studies based on patient registries.<sup>10</sup>

The European Medicines Agency (EMA) and some national medicines agencies

1. DARWIN EU

2. Data quality

3. Data discoverability

4. Skills

5. Business processes

6. Analytics capability

7. Expert advice

8. Data governance

9. International collaboration

10. Stakeholder engagement

11. Veterinary data strategy

<sup>1</sup>European Medicines Agency, Amsterdam, Netherlands; <sup>2</sup>Danish Medicines Agency, Copenhagen, Denmark; <sup>3</sup>BfArM, Bonn, Germany. \*Correspondence: Peter Arlett (Peter.Arlett@ema.europa.eu)

Received March 1, 2021; accepted November 1, 2021. doi:10.1002/cpt.2479

**Figure 1** Big Data Steering Group workplan to 2023. Eleven workstreams to progress the real-world evidence (RWE) vision.<sup>5</sup>



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“Our vision is that by 2025 the use of RWE will have been enabled and its value will have been established across the spectrum of regulatory use cases. We are committed to working with stakeholders to deliver this vision and in turn to support the development and use of better medicines for patients.”

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...it's a global responsibility for all stakeholders to support





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Ensuring the appropriate use of real-world evidence to inform regulatory decision-making is not just a European regulatory responsibility...

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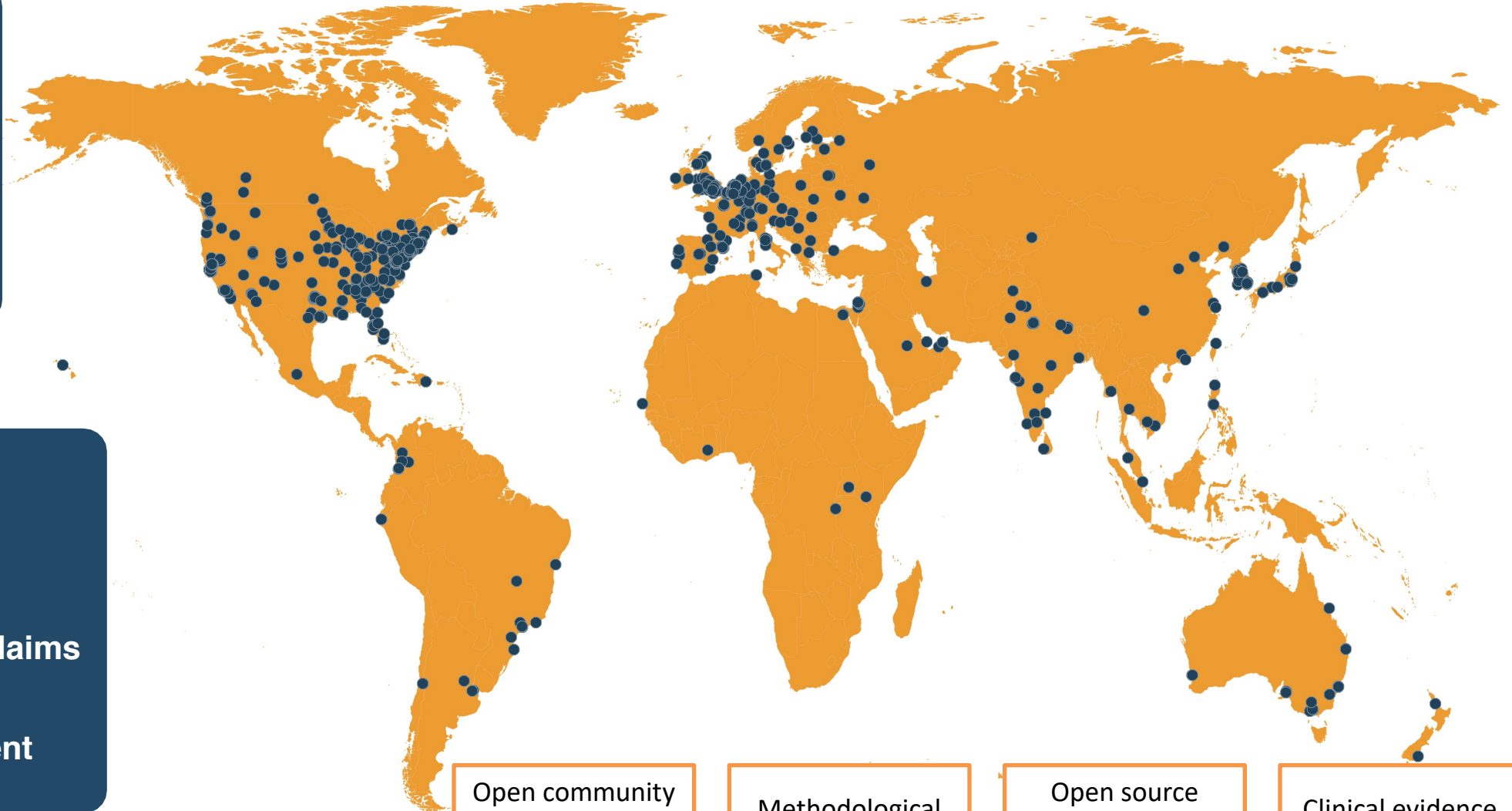


# OHDSI community

We're all in this journey together...

## OHDSI Collaborators

- 2,367 collaborators
- 74 countries
- 21 time zones
- 6 continents



## OHDSI Data Network

- 331 data sources
  - 284 EHRs
  - 28 administrative claims
- 34 countries
- 810 million unique patient records

Open community  
data standards  
(OMOP CDM)

Methodological  
research

Open source  
development  
(OHDSI tools)

Clinical evidence  
generation



Current status quo in observational research makes it  
challenging to build trust in evidence

Curate  
data



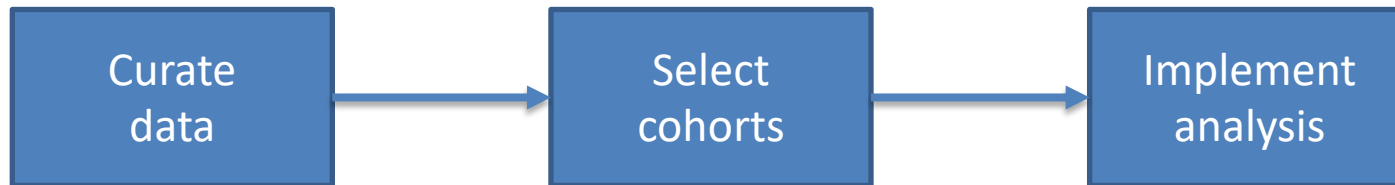


Current status quo in observational research makes it challenging to build trust in evidence





Current status quo in observational research makes it challenging to build trust in evidence





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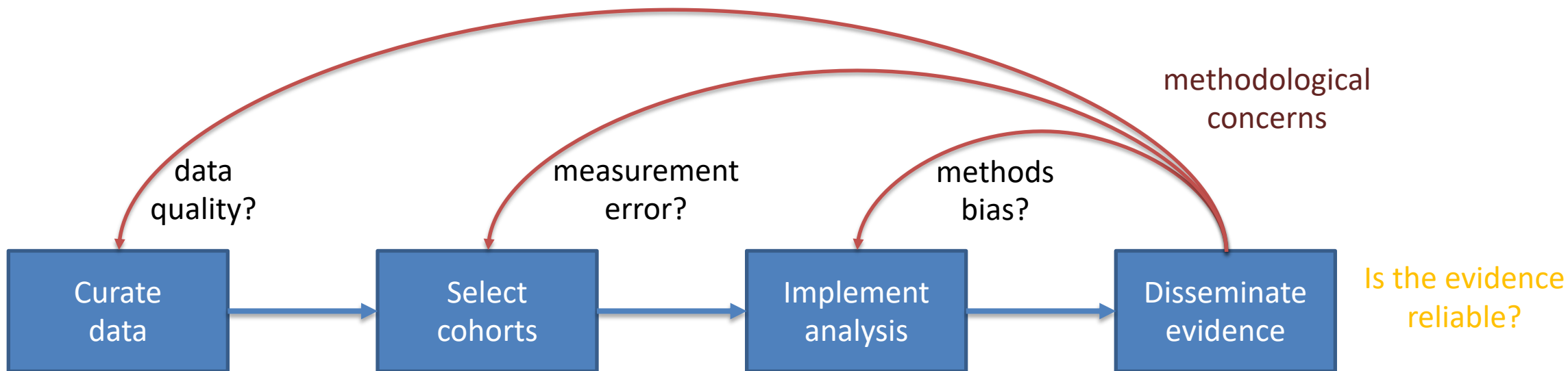


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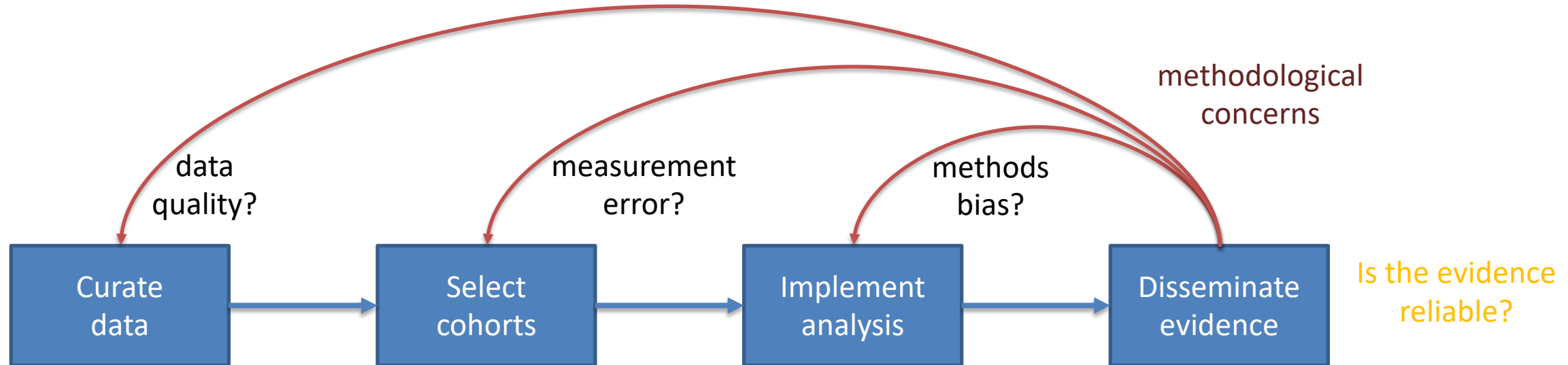






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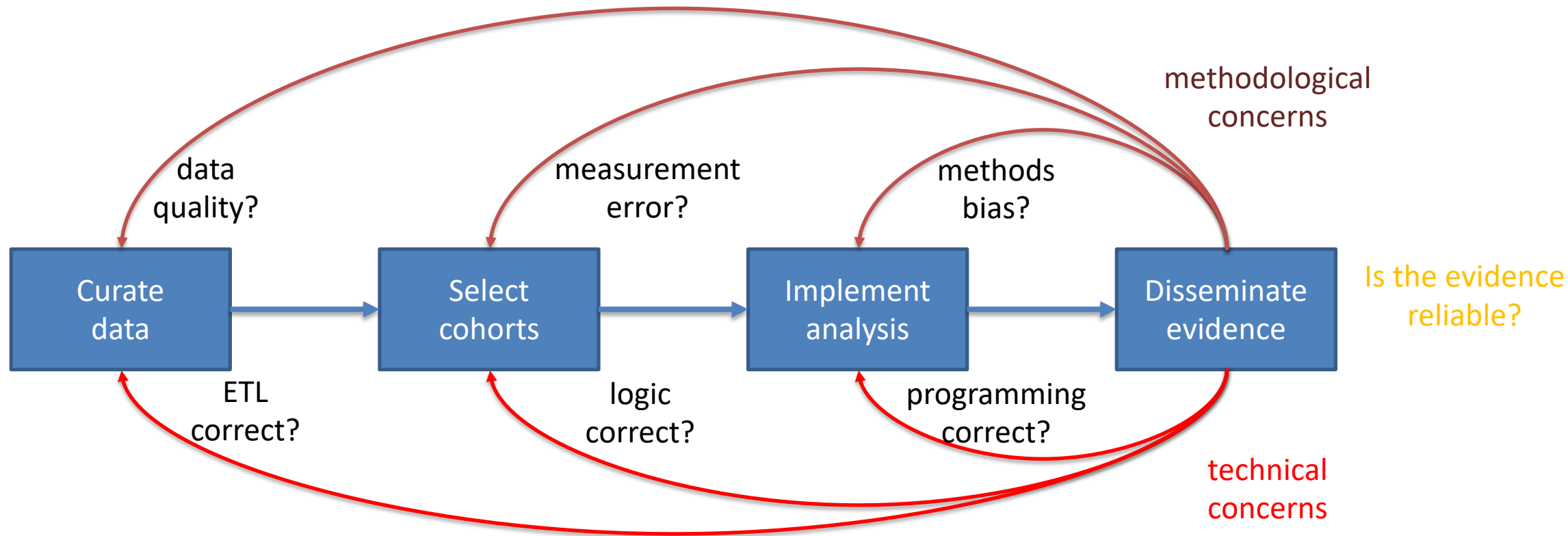
Does the study provide an unbiased effect estimate?  
Are the findings generalizable to the population of interest?





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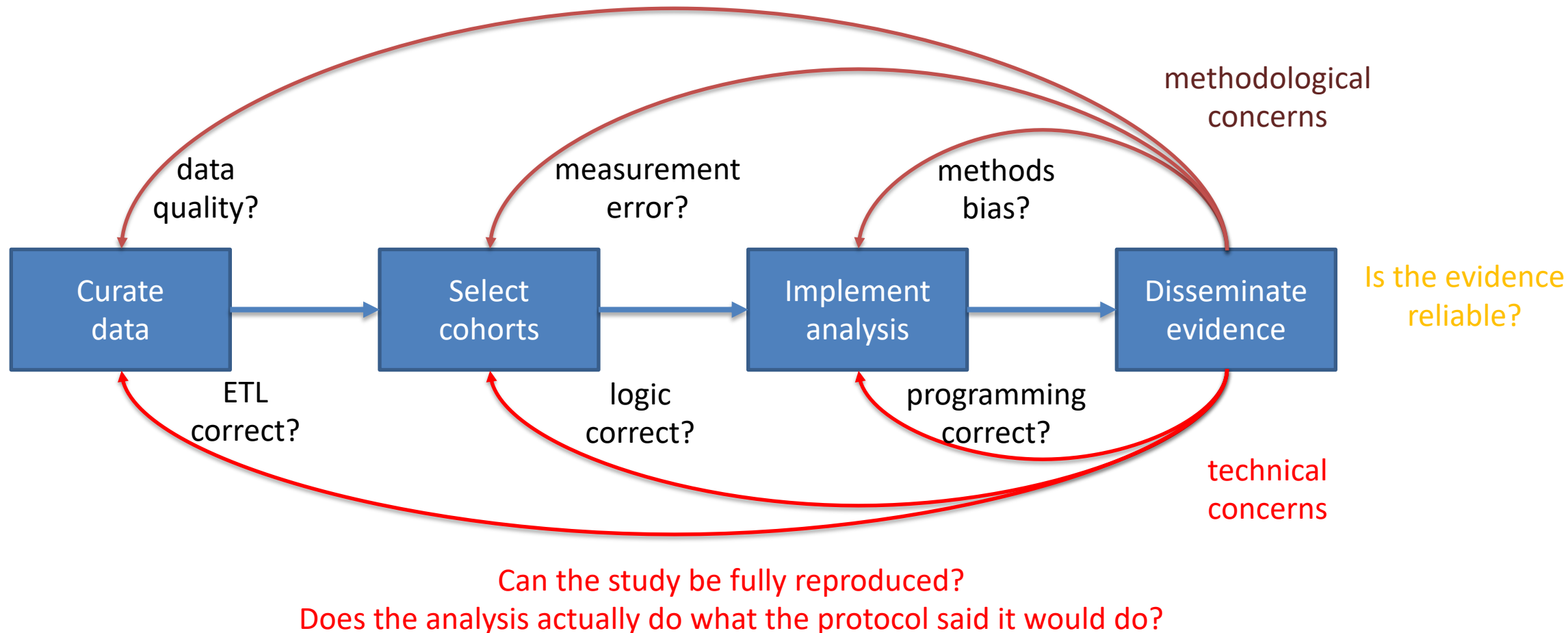
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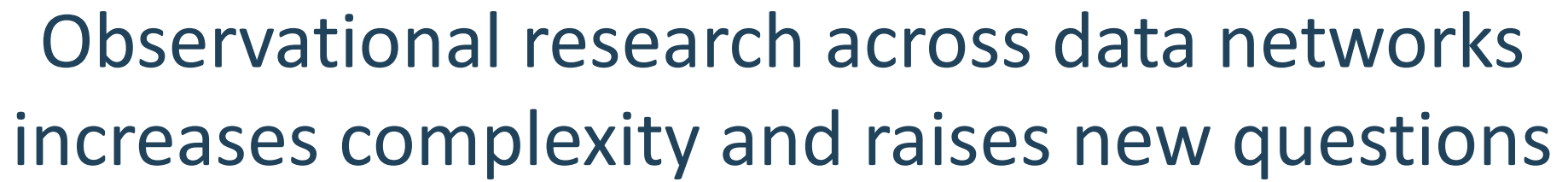




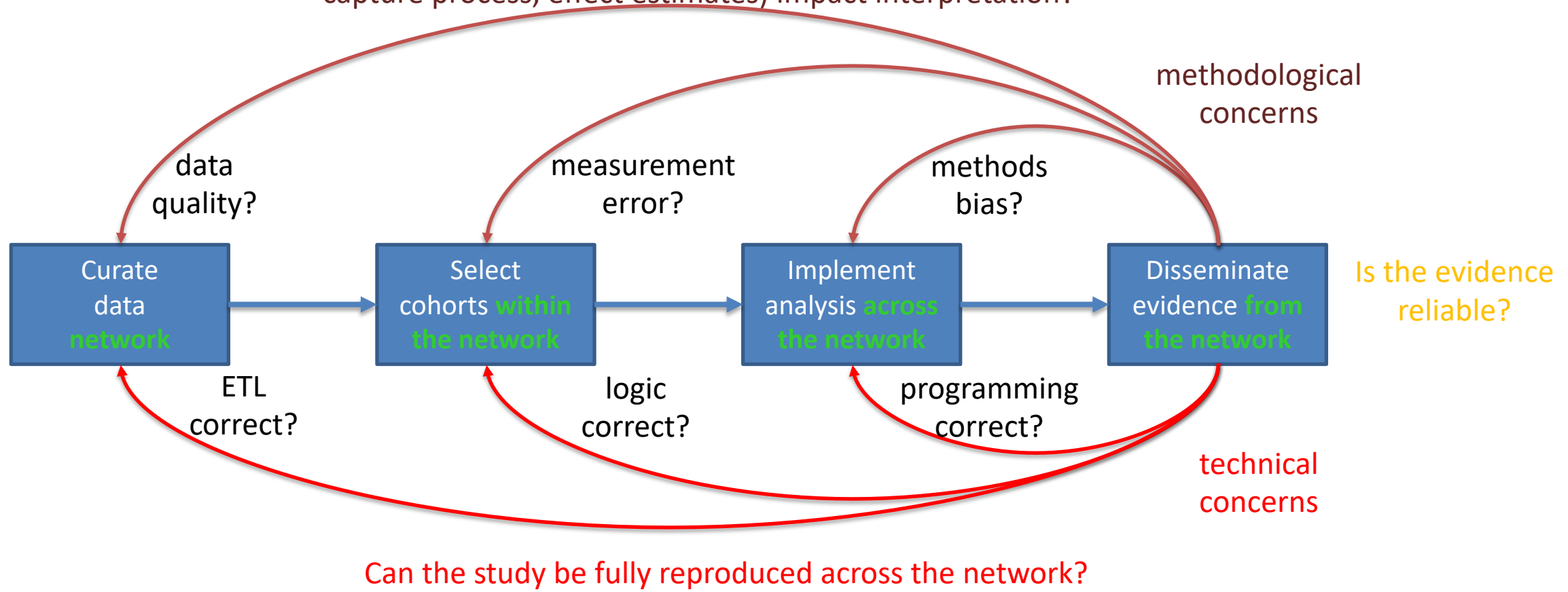
# Current status quo in observational research makes it challenging to build trust in evidence

Does the study provide an unbiased effect estimate?  
Are the findings generalizable to the population of interest?





How does heterogeneity across network (in population composition, data capture process, effect estimates) impact interpretation?





# Desired attributes for reliable evidence

Desired attribute	Question	Researcher	Data	Analysis		Result
Repeatable	Identical	Identical	Identical	Identical	=	Identical
Reproducible	Identical	Different	Identical	Identical	=	Identical
Replicable	Identical	Same or different	Similar	Identical	=	Similar
Generalizable	Identical	Same or different	Different	Identical	=	Similar
Robust	Identical	Same or different	Same or different	Different	=	Similar
Calibrated	Similar (controls)	Identical	Identical	Identical	=	Statistically consistent





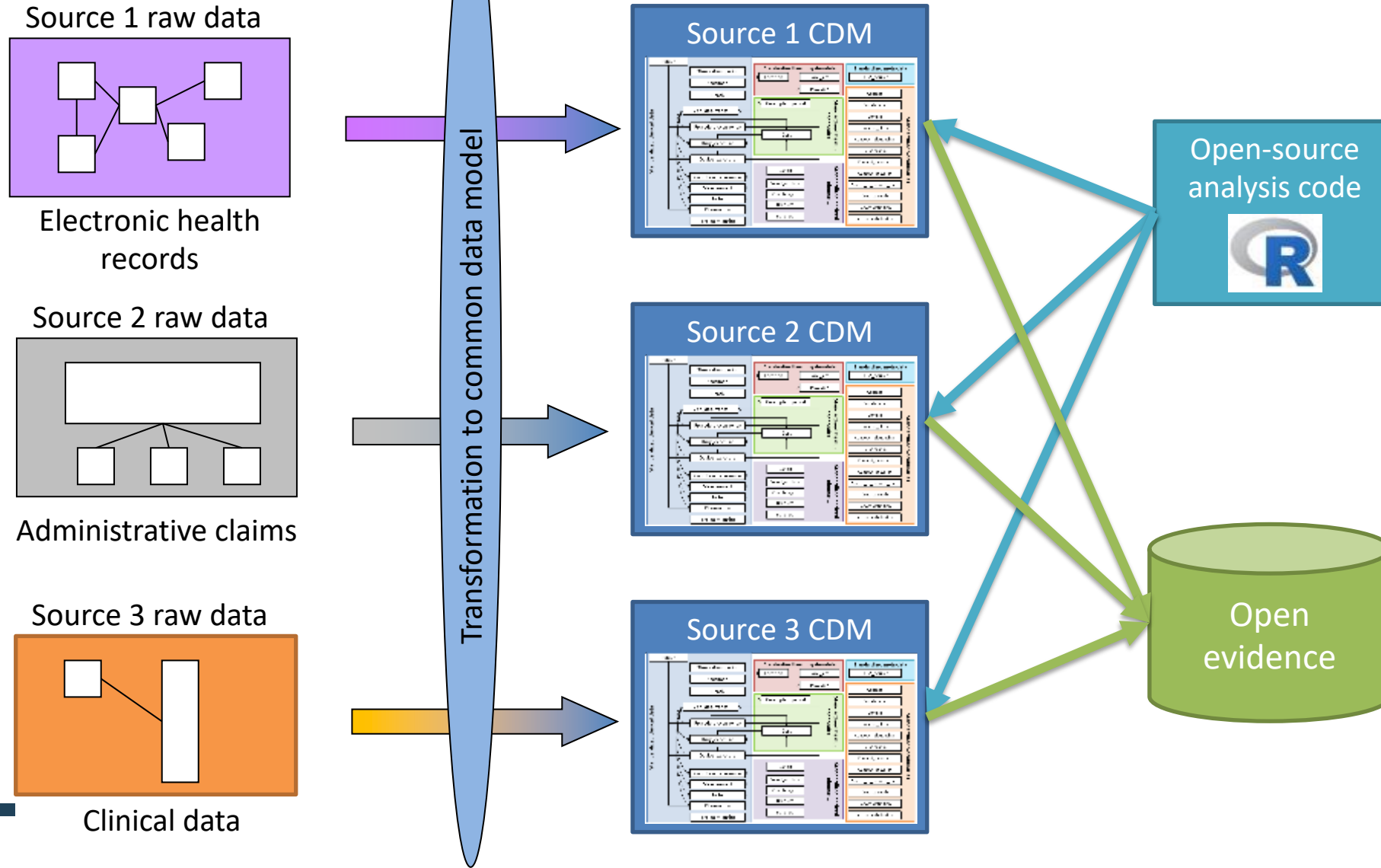
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Generalizable	Identical	Same or different	Different	Identical	=	Similar
Robust	Identical	Same or different	Same or different	Different	=	Similar
Calibrated	Similar (controls)	Identical	Identical	Identical	=	Statistically consistent

A system for real-world evidence generation based on consistent application of standardized analytics across a standardized data network can be empirically demonstrated to be reliable

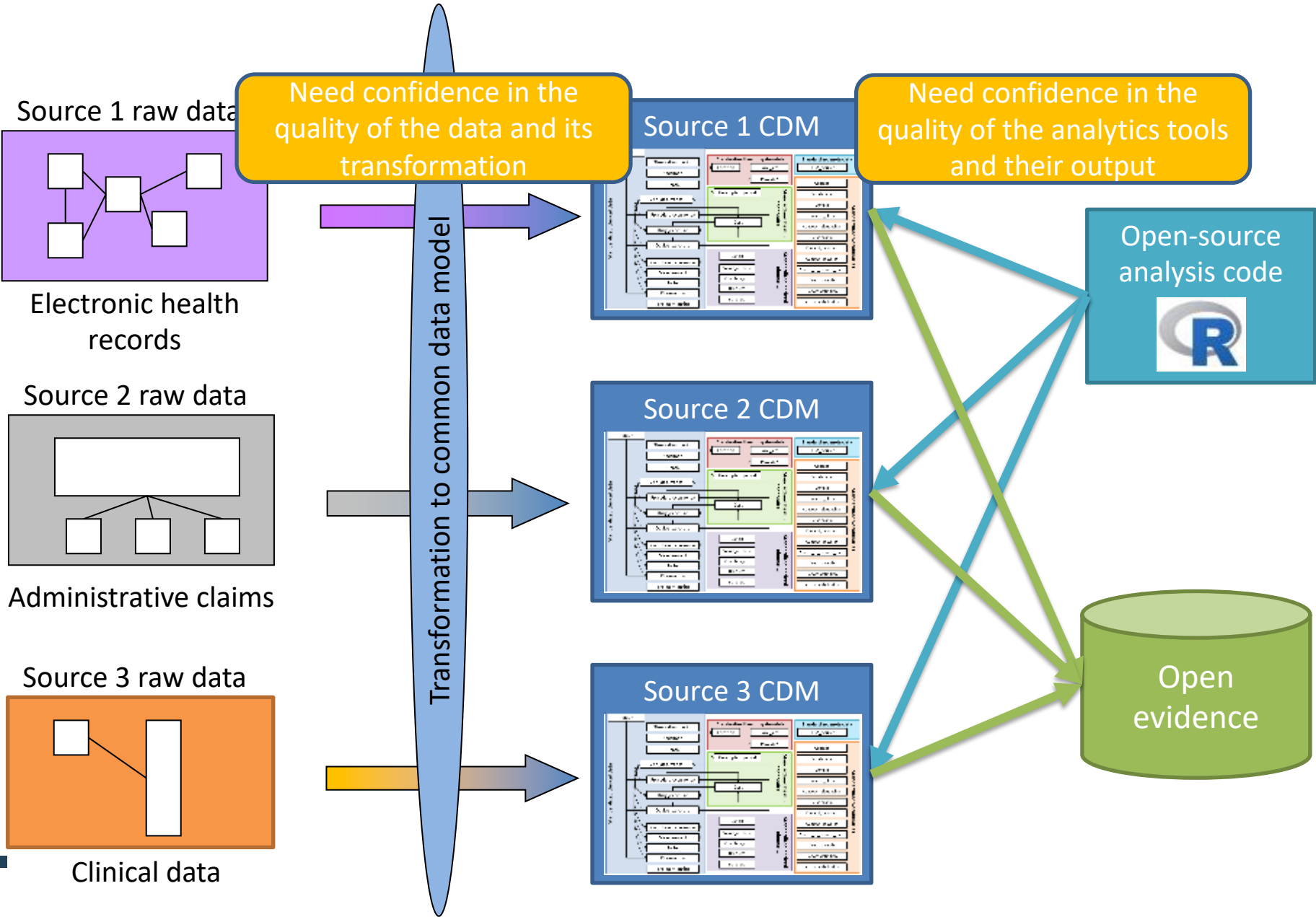


# Common data model can enable standardized analytics across a distributed data network



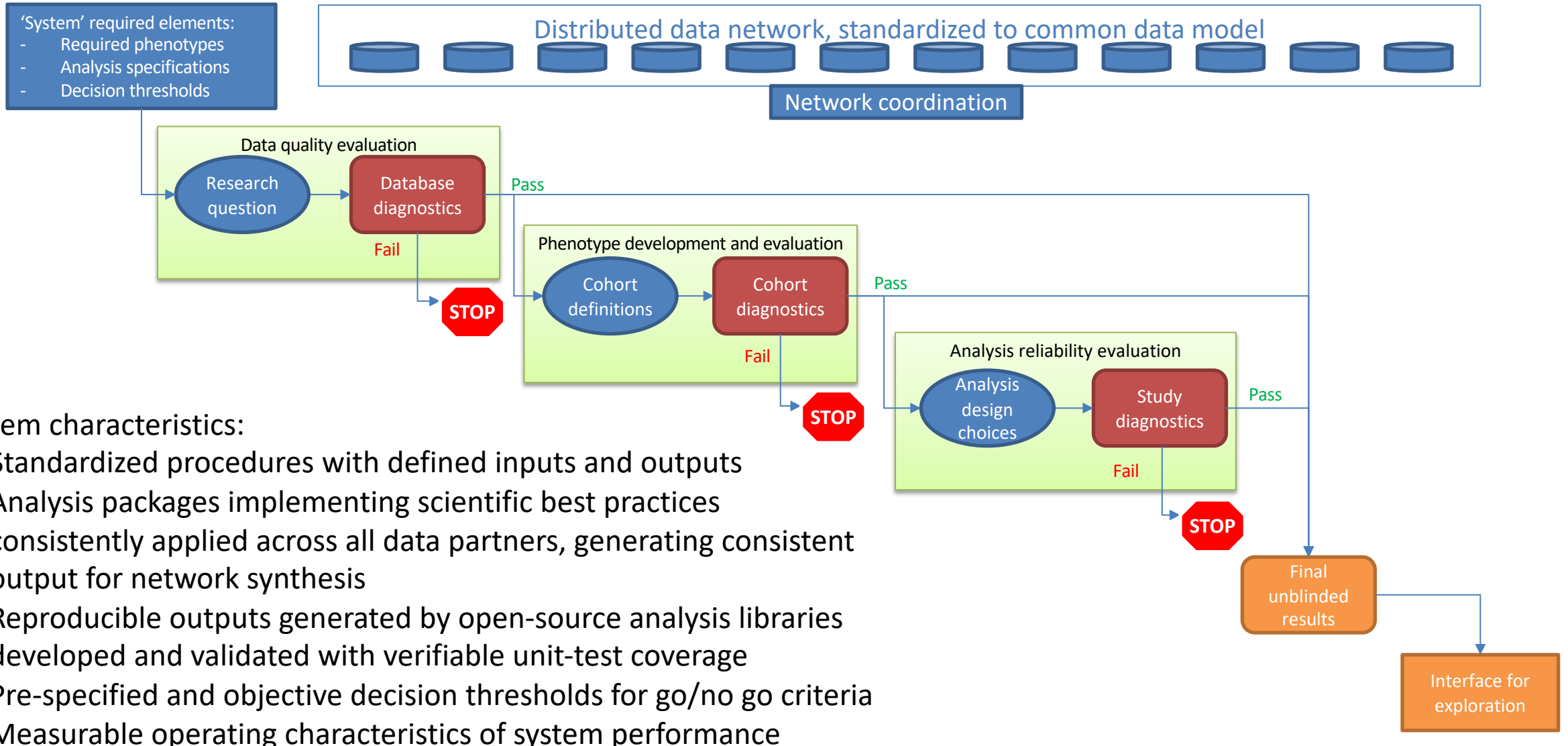


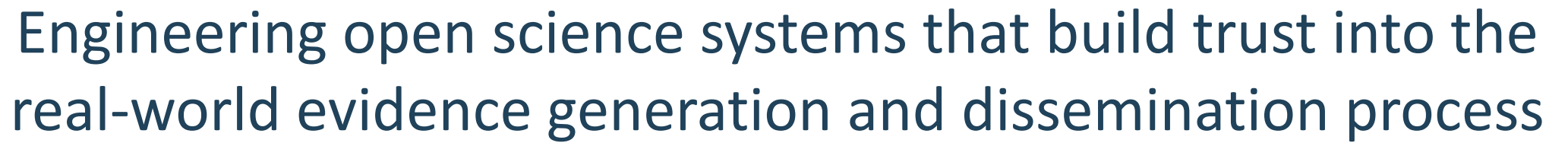
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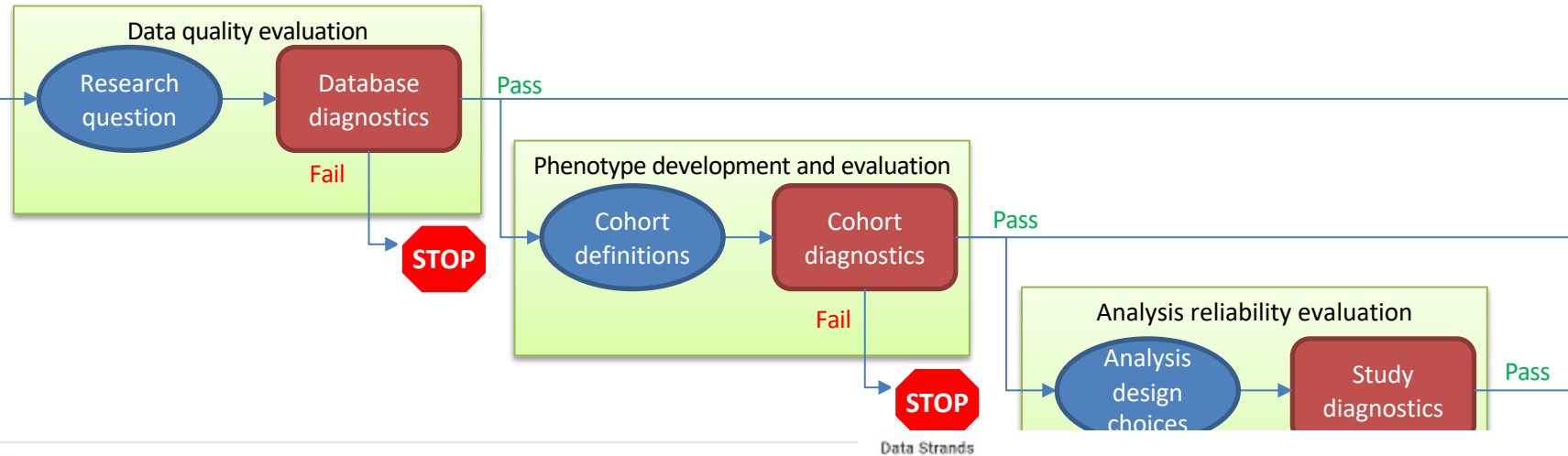
# Engineering open science systems that build trust into the real-world evidence generation and dissemination process



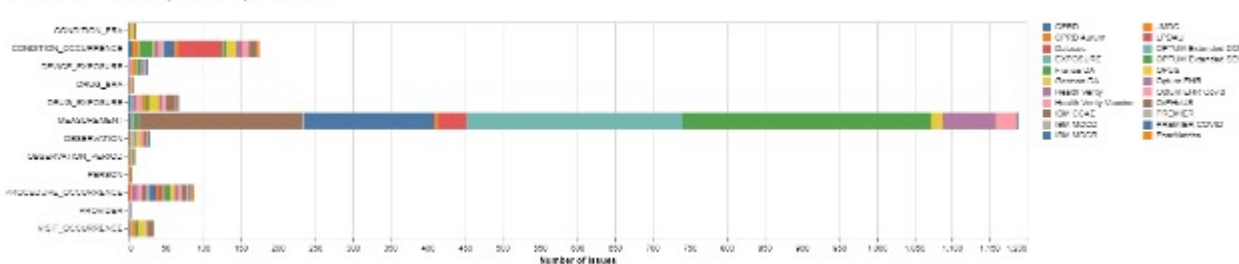


- Required phenotypes
- Analysis specifications
- Decision thresholds

## Network coordination



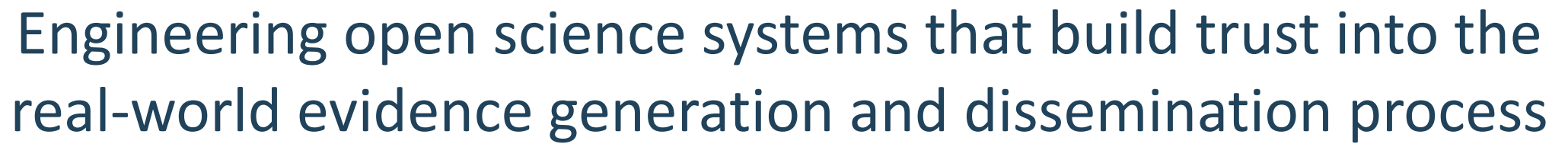
### Network Data Quality Issues by CDM Table



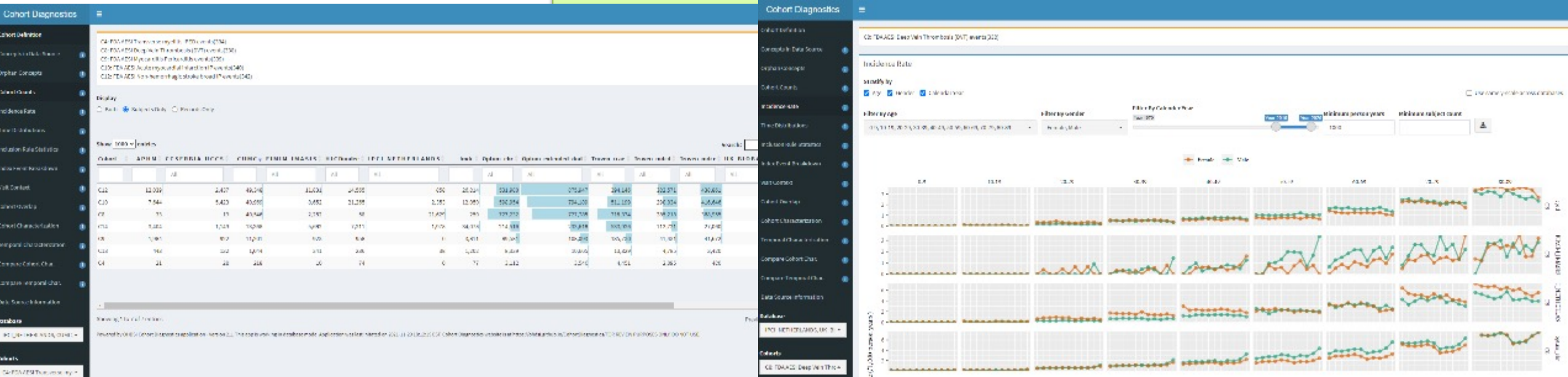
### Data Strands







- Required phenotypes
- Analysis specifications
- Decision thresholds





# Engineering open science systems that build trust into the real-world evidence generation and dissemination process

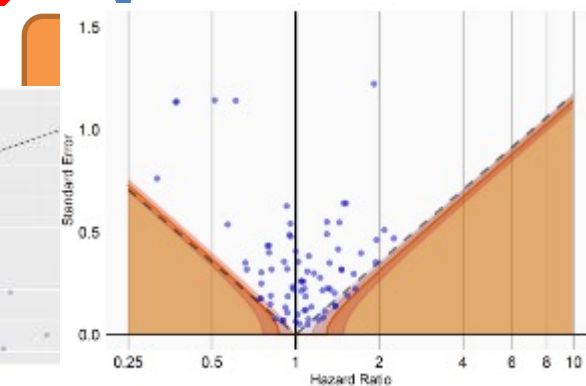
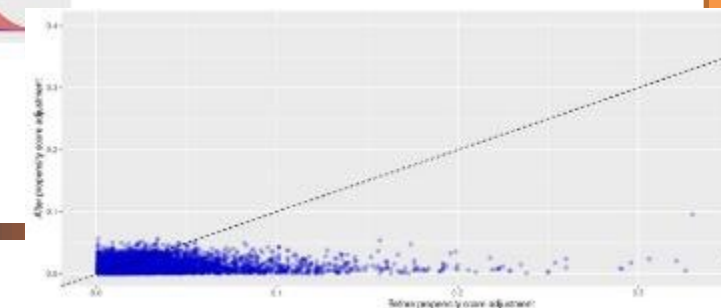
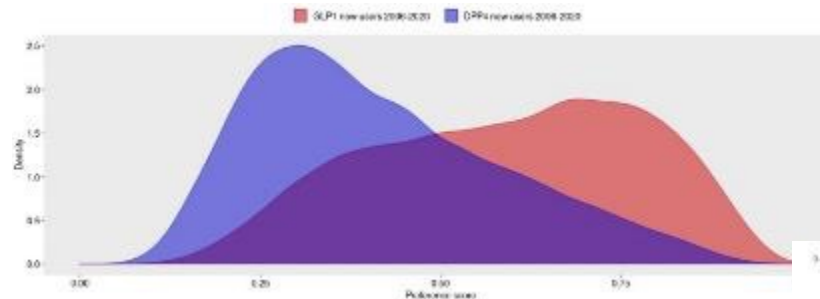
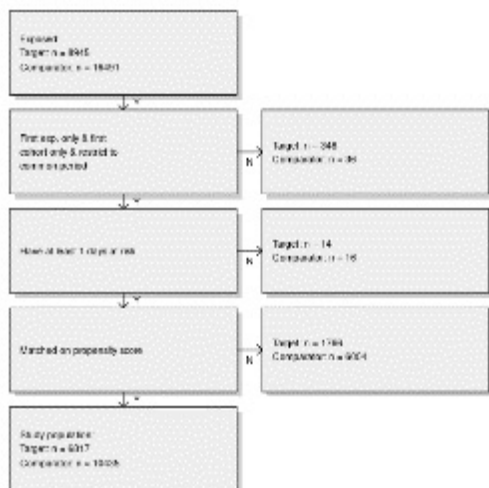
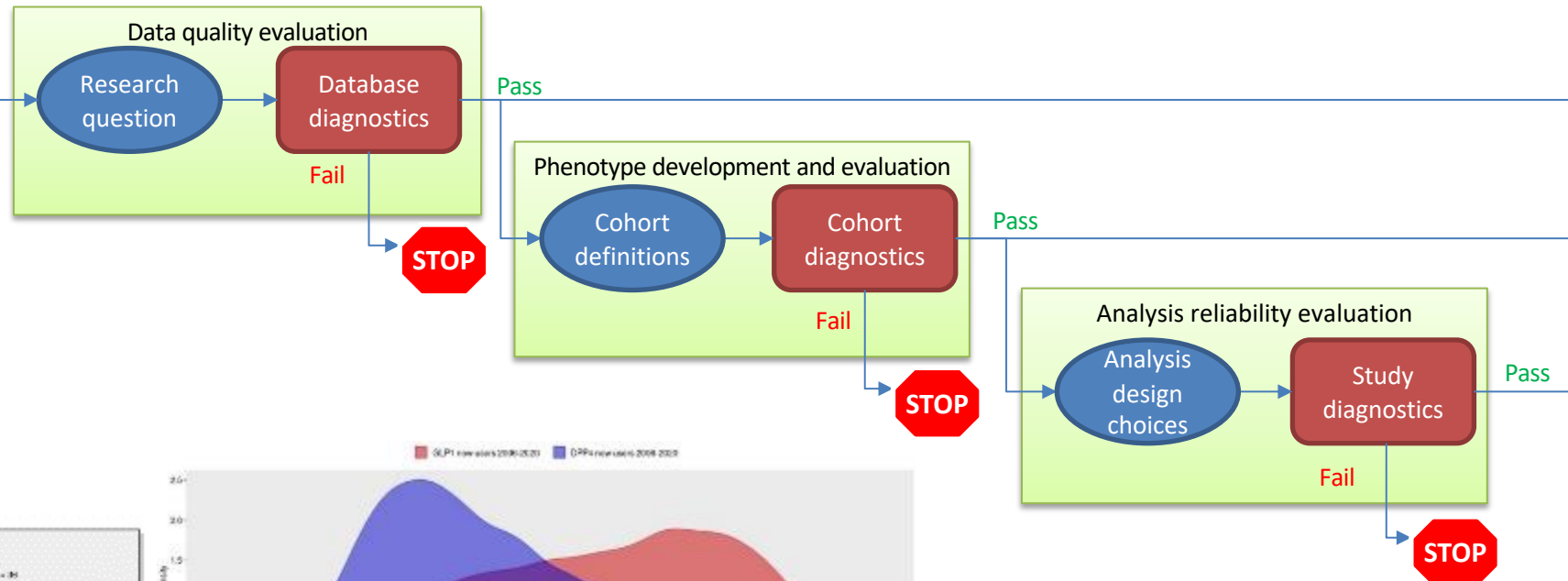
'System' required elements:

- Required phenotypes
- Analysis specifications
- Decision thresholds

Distributed data network, standardized to common data model



Network coordination





# Engineering open science systems that build trust into the real-world evidence generation and dissemination process

'System' required elements:

- Required phenotypes
- Analysis specifications
- Decision thresholds

Distributed data network, standardized to common data model



Network coordination

Data quality evaluation

Research question

Database diagnostics

Pass

Fail

STOP

Phenotype development and evaluation

Cohort definitions

Cohort diagnostics

Pass

Fail

STOP

Analysis reliability evaluation

Analysis design choices

Study diagnostics

Pass

Fail

STOP

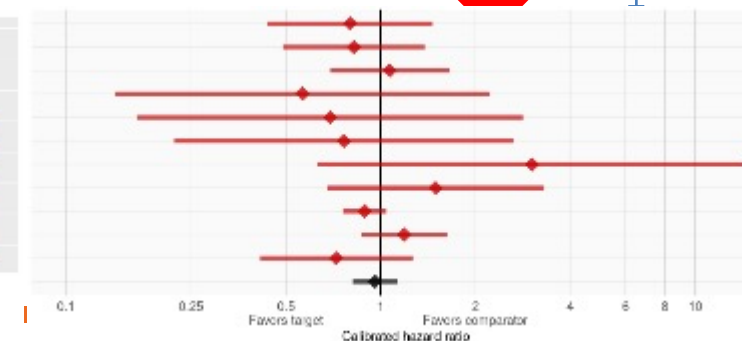
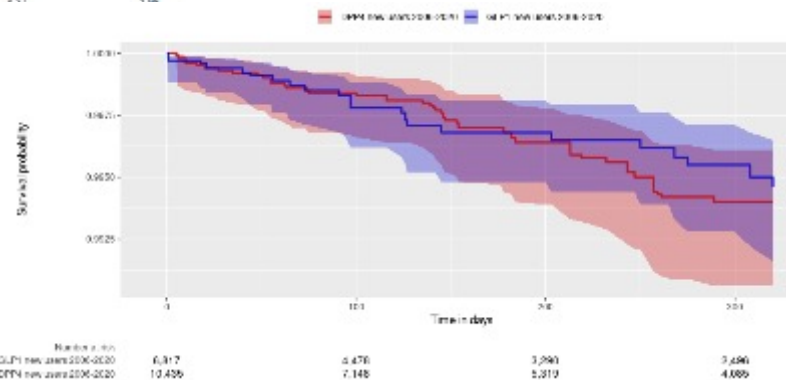
Interface for exploration

Table 1a. Number of subjects, follow up time (in years), number of outcome events, and event incidence rate (IR) per 1,000 patient years (PY) in the target (A/P) and comparator (B/M) user groups (2000-2020) group after propensity score adjustment, as well as the minimum detectable absolute risk (MDAR). Note that the MDAR is the minimum detectable absolute risk (MDAR).

Target subjects	Comparator subjects	Target years	Comparator years	Target events	Comparator events	Target IR (per 1,000 PY)	Comparator IR (per 1,000 PY)	MDAR
6,317	10,456	8,799	9,154	22	01	0.25	0.01	0.001

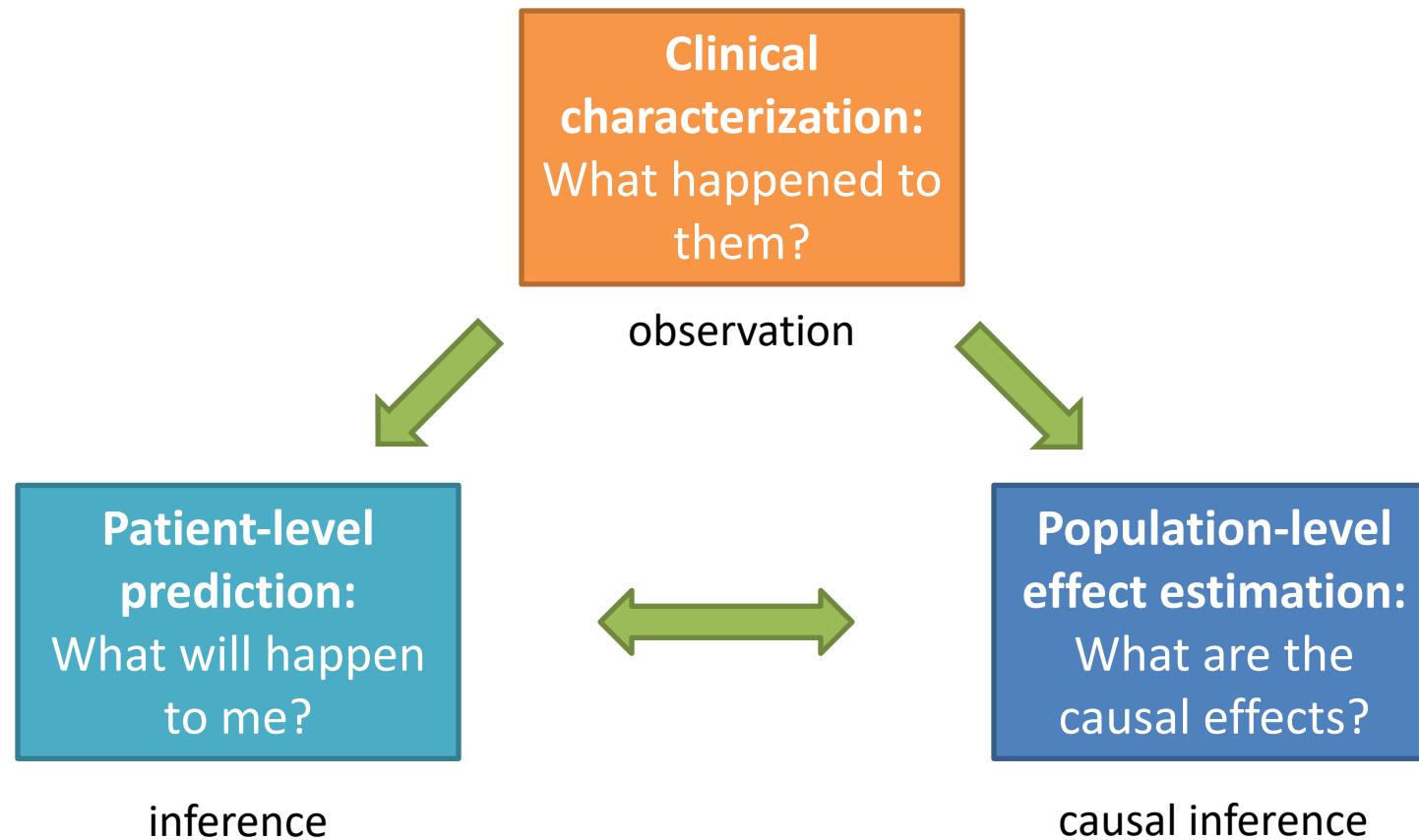
Table 1b. Time (days) at risk distribution expressed as minimum (min), 25th percentile (P25), median, 75th percentile (P75), and maximum (max) for the target and comparator (2000-2020) user groups after propensity score adjustment.

Cohort	Min	P10	P25	Median	P75	P90	Max
Target	1	30	75	155	260	350	350
Comparator	0	30	80	207	305	305	305





# Complementary types of evidence to generate from real-world data



# Three potential use cases for the support to committees' decision-making

From a regulatory perspective, RWE aims to support committees' decision-making in three main areas

Use case objective	Support the planning & validity of applicant studies	Understand clinical context	Investigate associations and impact
Use case category	Design and feasibility of planned studies	Disease epidemiology	Effectiveness and safety studies
	Representativeness and validity of Completed studies	Clinical management & drug utilisation	Impact of regulatory actions





# Mapping regulatory use cases to evidence types

Support the  
planning &  
validity of  
applicant studies

Design and feasibility of  
planned studies

Representativeness and  
validity of Completed studies

Understand  
clinical context

Disease epidemiology

Clinical management & drug  
utilisation

Investigate  
associations and  
impact

Effectiveness and safety  
studies

Impact of regulatory actions

**Clinical  
characterization:**  
What happened to  
them?

**Population-level  
effect estimation:**  
What are the  
causal effects?

**Patient-level  
prediction:**  
What will happen  
to me?



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**Questions that can be informed  
with real world evidence:**

Who are the patients with disease  
eligible for treatment?  
Who are the patients exposed to  
those treatments?  
How often do outcomes occur  
amongst those patients?

Is the outcome causally related to  
exposure to treatment?  
How does the risk compare with  
alternative treatments?

Which risks can be actionably  
predicted with available data?  
Which patients are at highest risk  
of adverse events?



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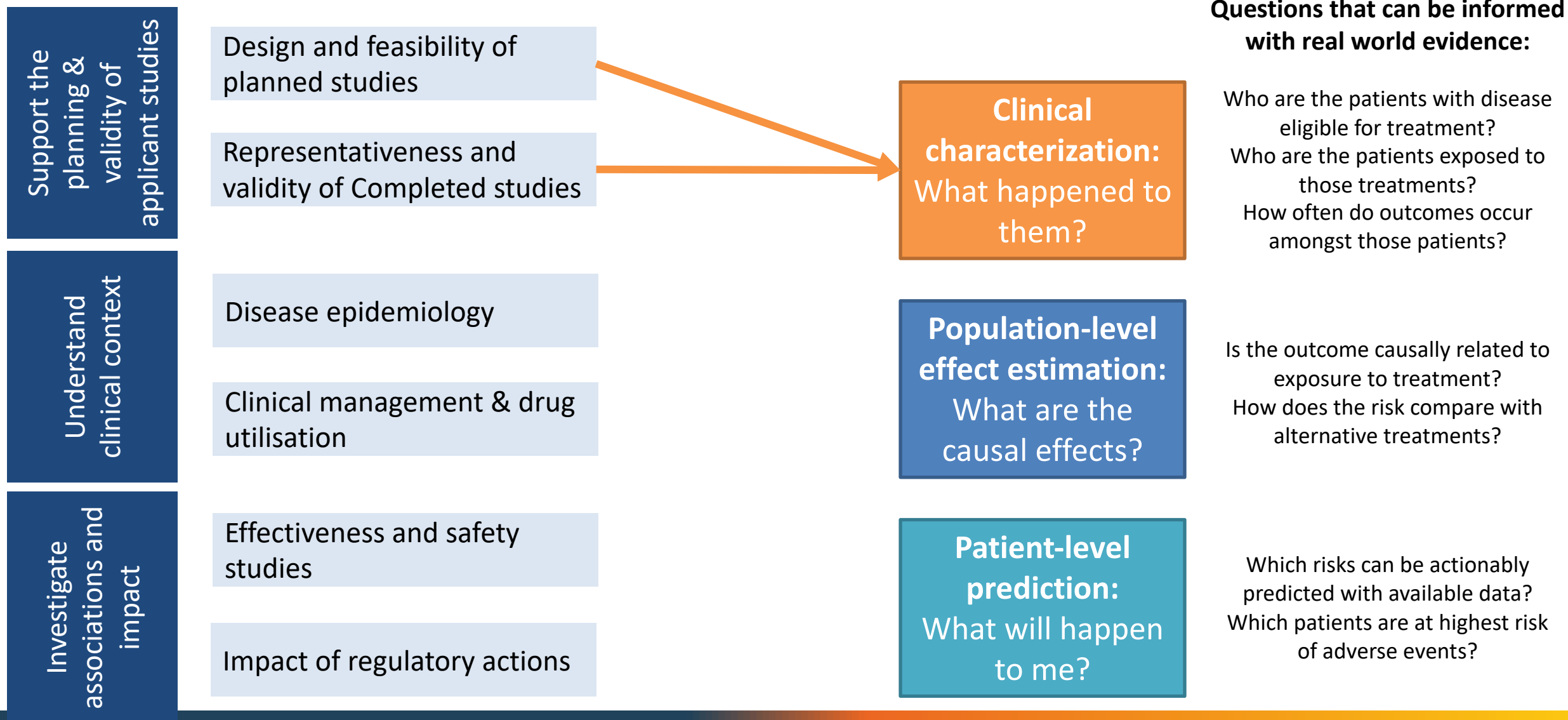
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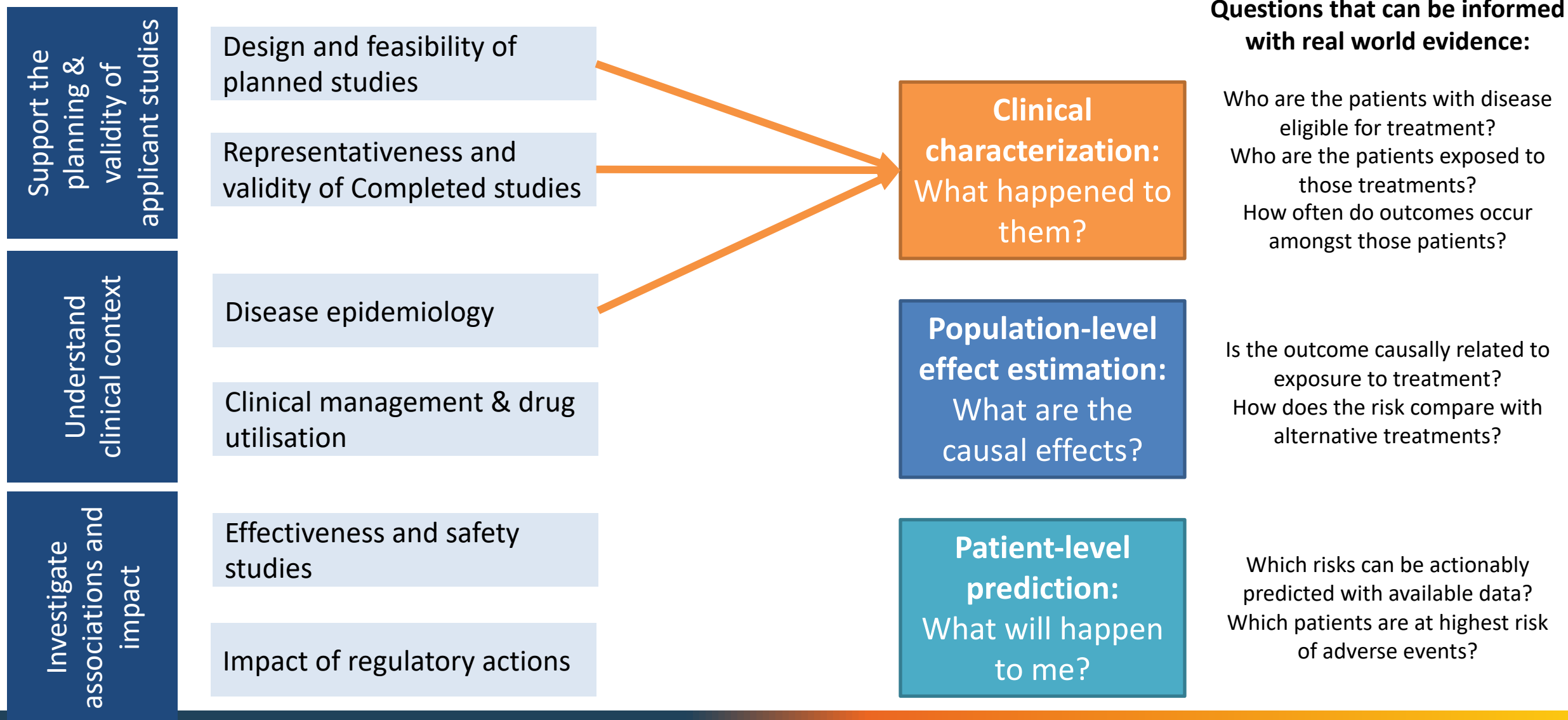


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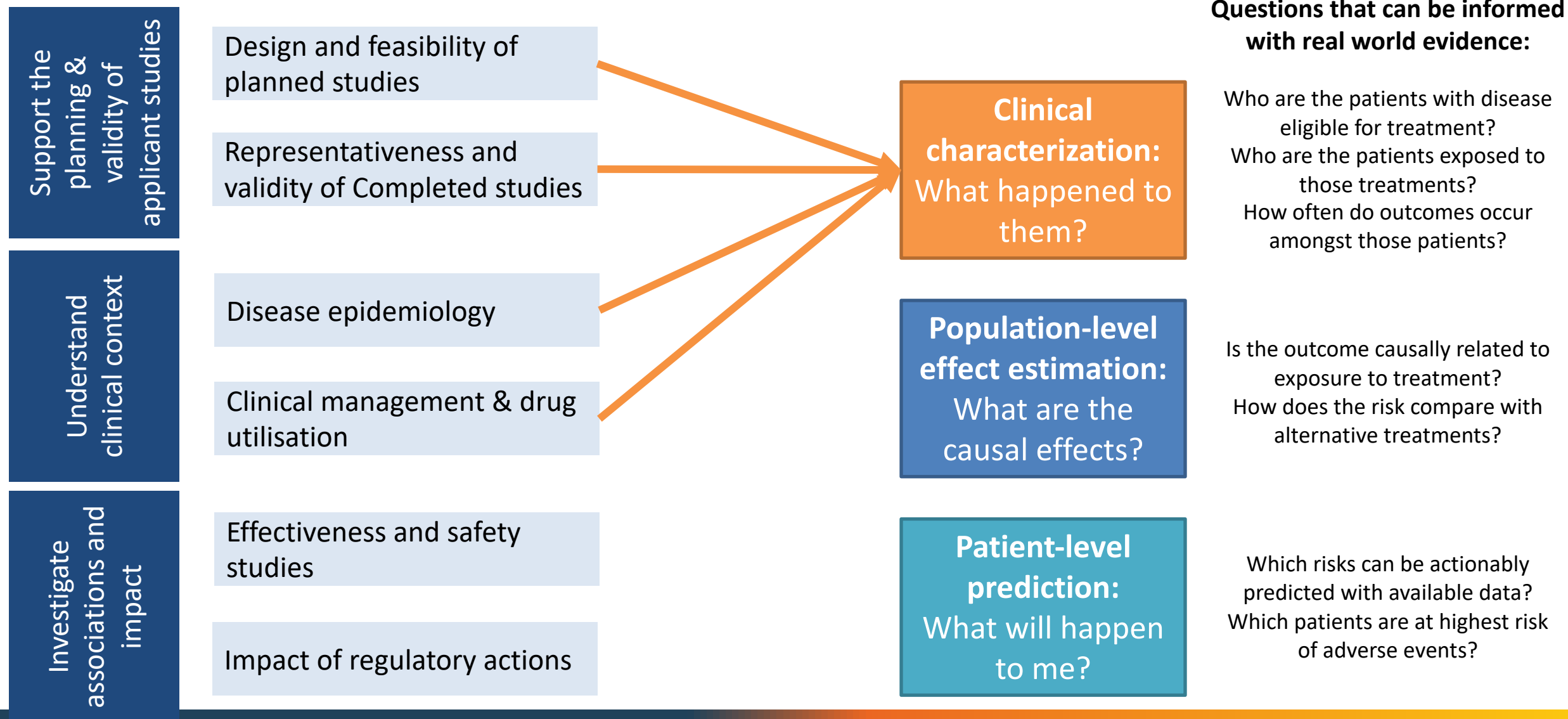


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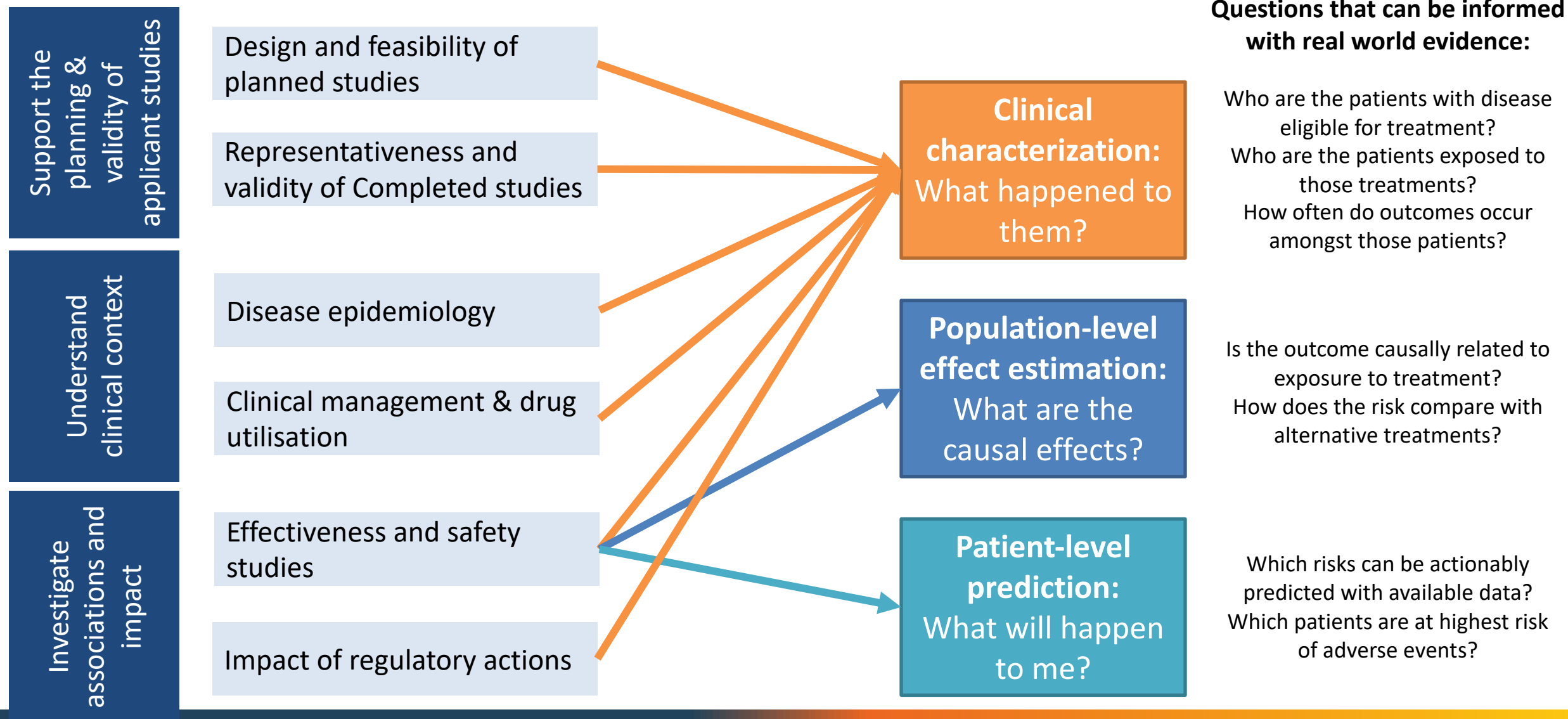
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# Mapping regulatory use cases to evidence types







# Level of proactivity in delivering real-world evidence

## Reactive Bespoke

Service bespoke project requests by convening team to align on problem statement, author protocol/analysis plan documents, implement statistical programming code to custom specification, execute analysis across databases, iteratively review results and request post hoc analyses, write summary of results as report, and deliver to decision-maker to ensure it meets their needs



# Level of proactivity in delivering real-world evidence

## Enabled

Design and execute standardized analysis packages that apply validated statistical libraries with defined input parameters and fixed output to compile summary results across a network standardized to a common data model

## Reactive Bespoke

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# Level of proactivity in delivering real-world evidence

## Responsive

Enable fast evidence generation by using interface that allow qualified users to set defined input parameters, execute standardized analyses, and view results upon request.

## Enabled

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# Level of proactivity in delivering real-world evidence

## Prepared

Produce pre-computed evidence to enable answer retrieval in 'real time' by qualified users when requested; standardized analysis packages executed across network generate results 'at-scale' across many target, outcome cohorts

## Responsive

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# Level of proactivity in delivering real-world evidence

## Anticipatory

Generate and deliver insights without being asked; answer questions before requested by 'pushing' relevant pre-computed evidence to potential evidence consumers

## Prepared

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Standardized dissemination

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## Prepared

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Standardized analysis configurations

+

## Responsive

Enable fast evidence generation by using interface that allow qualified users to set defined input parameters, execute standardized analyses, and view results upon request.

Standardized analysis tools

+

## Enabled

Design and execute standardized analysis packages that apply validated statistical libraries with defined input parameters and fixed output to compile summary results across a network standardized to a common data model

Standardized data, network execution

## Reactive Bespoke

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# Level of proactivity in delivering real-world evidence

Time-to-evidence

~seconds

Anticipatory

Generate and deliver insights without being asked; answer questions before requested by 'pushing' relevant pre-computed evidence to potential evidence consumers

Standardized dissemination

+

~minutes

Prepared

Produce pre-computed evidence to enable answer retrieval in 'real time' by qualified users when requested; standardized analysis packages executed across network generate results 'at-scale' across many target, outcome cohorts

Standardized analysis configurations

+

~hours

Responsive

Enable fast evidence generation by using interface that allow qualified users to set defined input parameters, execute standardized analyses, and view results upon request.

Standardized analysis tools

+

~days

Enabled

Design and execute standardized analysis packages that apply validated statistical libraries with defined input parameters and fixed output to compile summary results across a network standardized to a common data model

Standardized data, network execution

~weeks,  
months,  
years

Reactive  
Bespoke

Service bespoke project requests by convening team to align on problem statement, author protocol/analysis plan documents, implement statistical programming code to custom specification, execute analysis across databases, iteratively review results and request post hoc analyses, write summary of results as report, and deliver to decision-maker to ensure it meets their needs



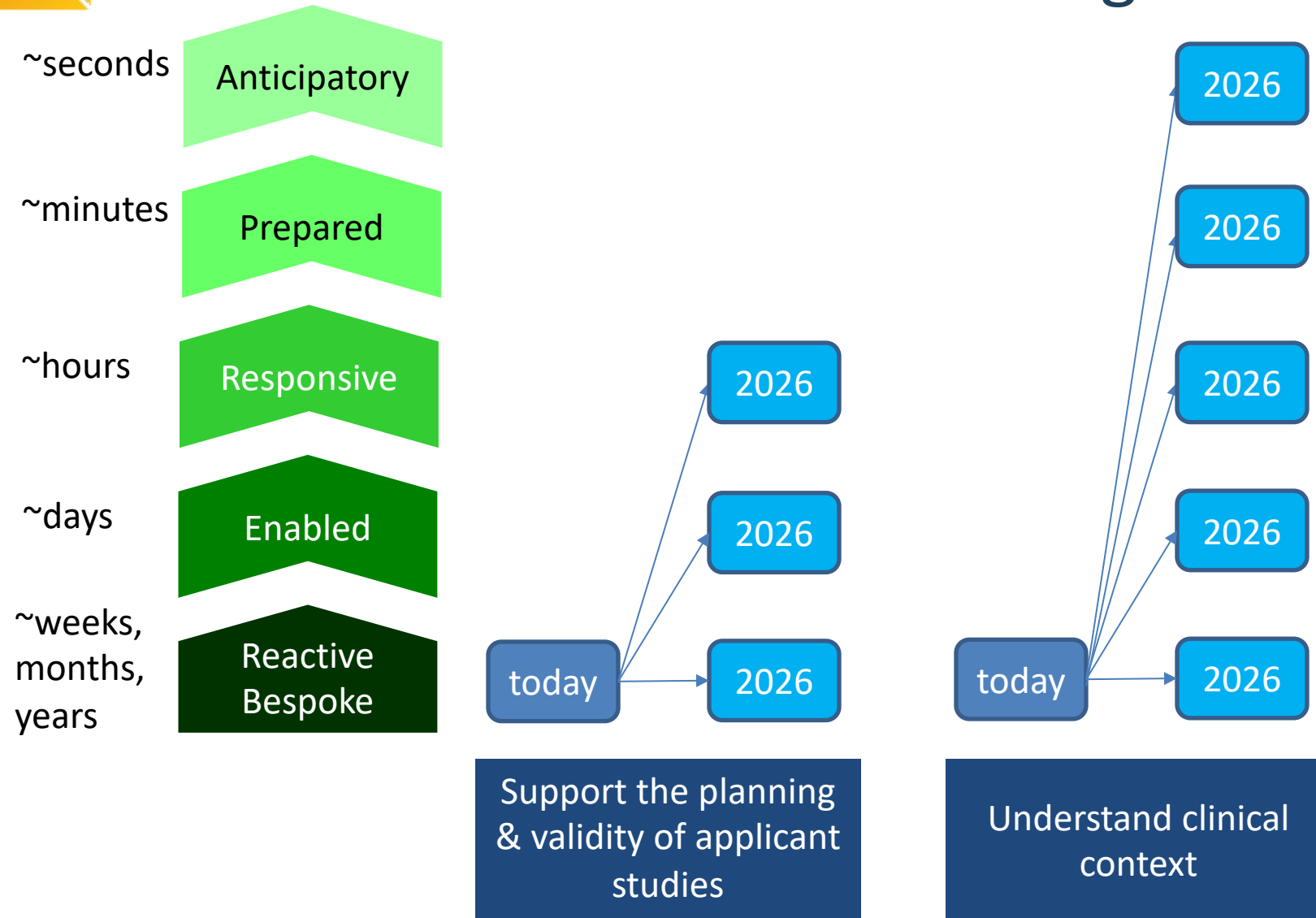
# A 5-year vision for expanding the proactive use of real-world evidence across regulatory use cases





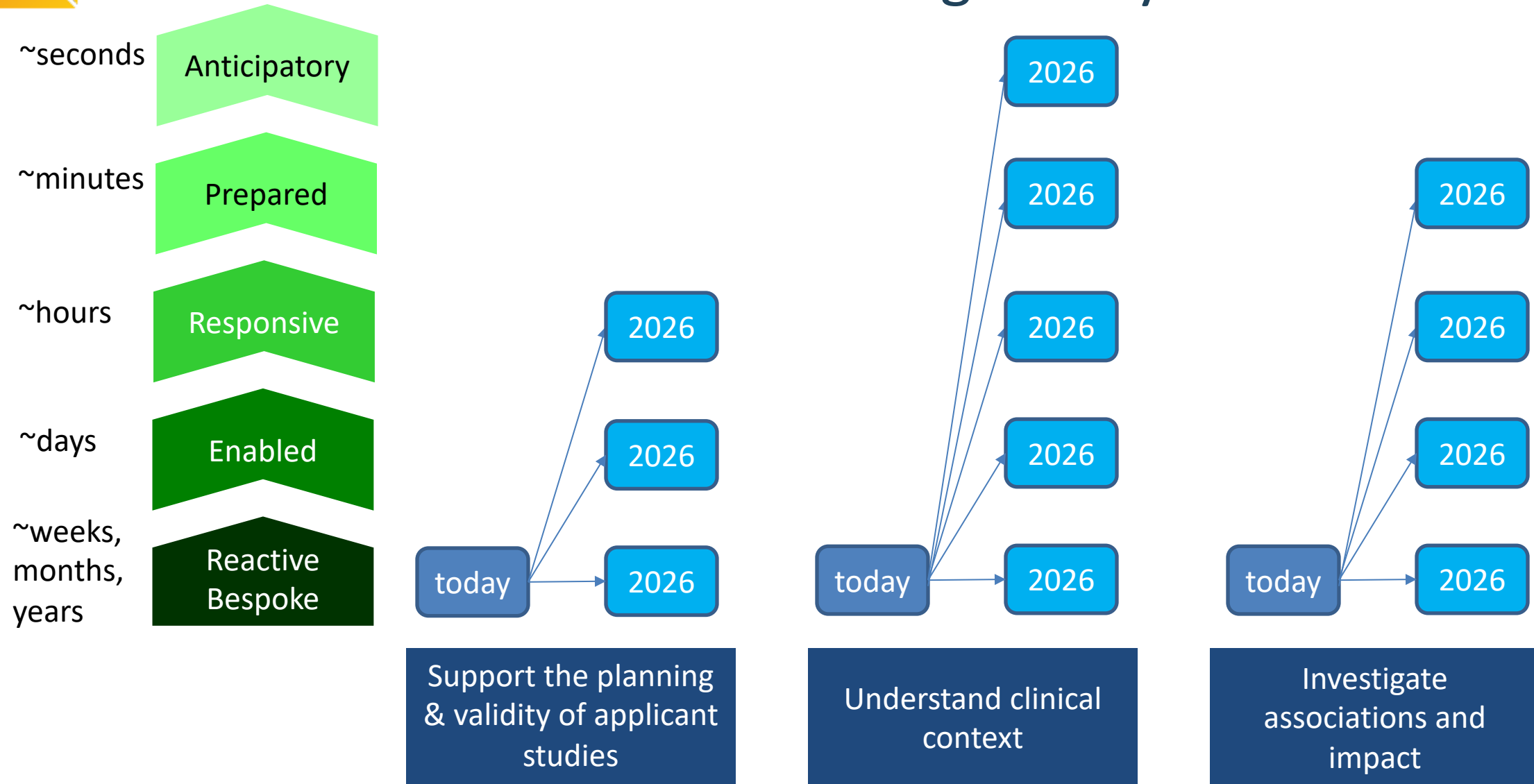


# A 5-year vision for expanding the proactive use of real-world evidence across regulatory use cases





# A 5-year vision for expanding the proactive use of real-world evidence across regulatory use cases





# Expanding the proactive use of real-world evidence for study planning and validity

Journal of the American Medical Informatics Association, 28(1), 2021, 144–154  
doi: 10.1093/jamia/ocaa224  
Advance Access Publication Date: 4 November 2020  
Review

AMIA  
ADVANCING THE PROFESSIONAL LEADING THE WAY

OXFORD

~seconds

Anticipatory

~minutes

Prepared

~hours

Responsive

~days

Enabled

~weeks,  
months,  
years

Reactive  
Bespoke

today

2026

2026

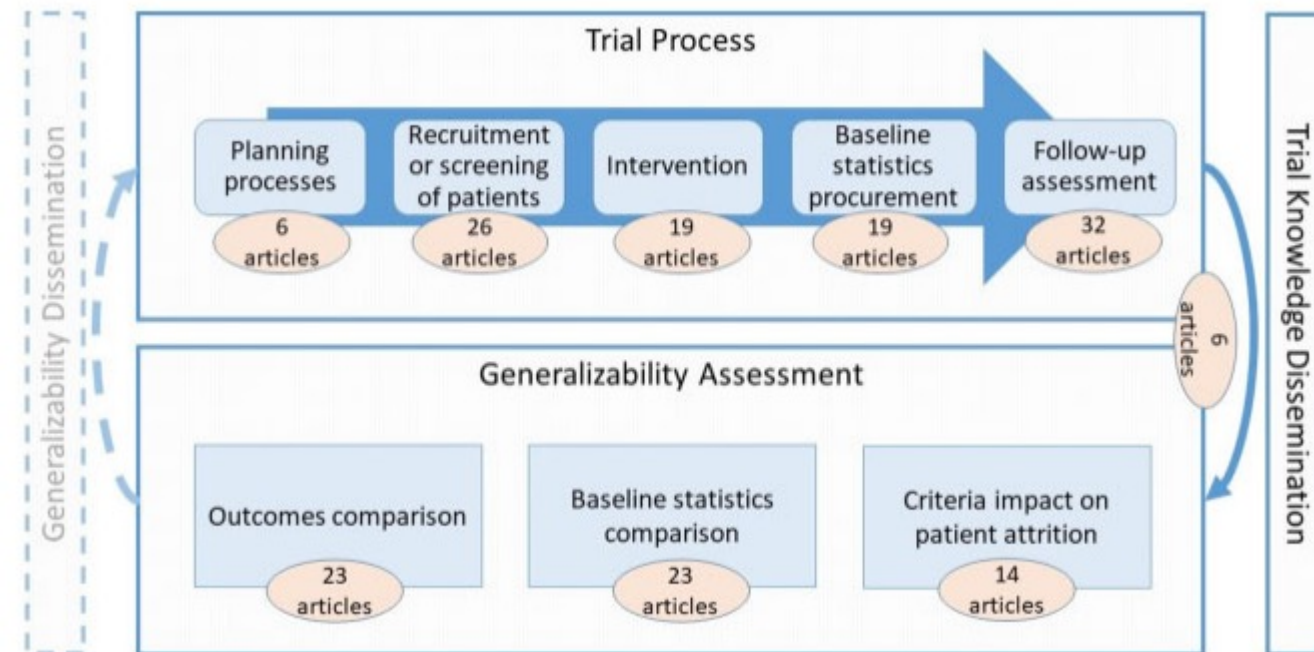
2026

Support the planning  
& validity of applicant  
studies

Review

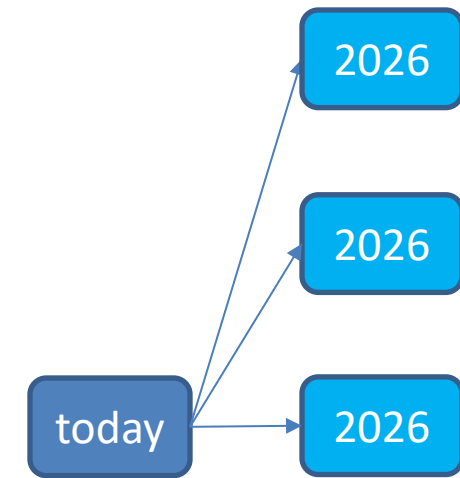
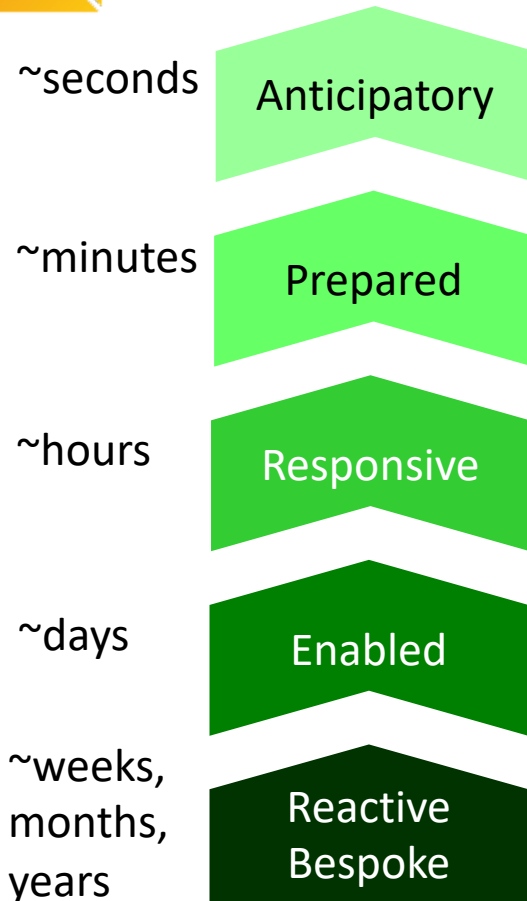
## Contemporary use of real-world data for clinical trial conduct in the United States: a scoping review

James R. Rogers<sup>1</sup>, Junghwan Lee<sup>1</sup>, Ziheng Zhou<sup>2</sup>, Ying Kuen Cheung<sup>3</sup>, George Hripcsak<sup>1,4</sup> and Chunhua Weng<sup>1</sup>

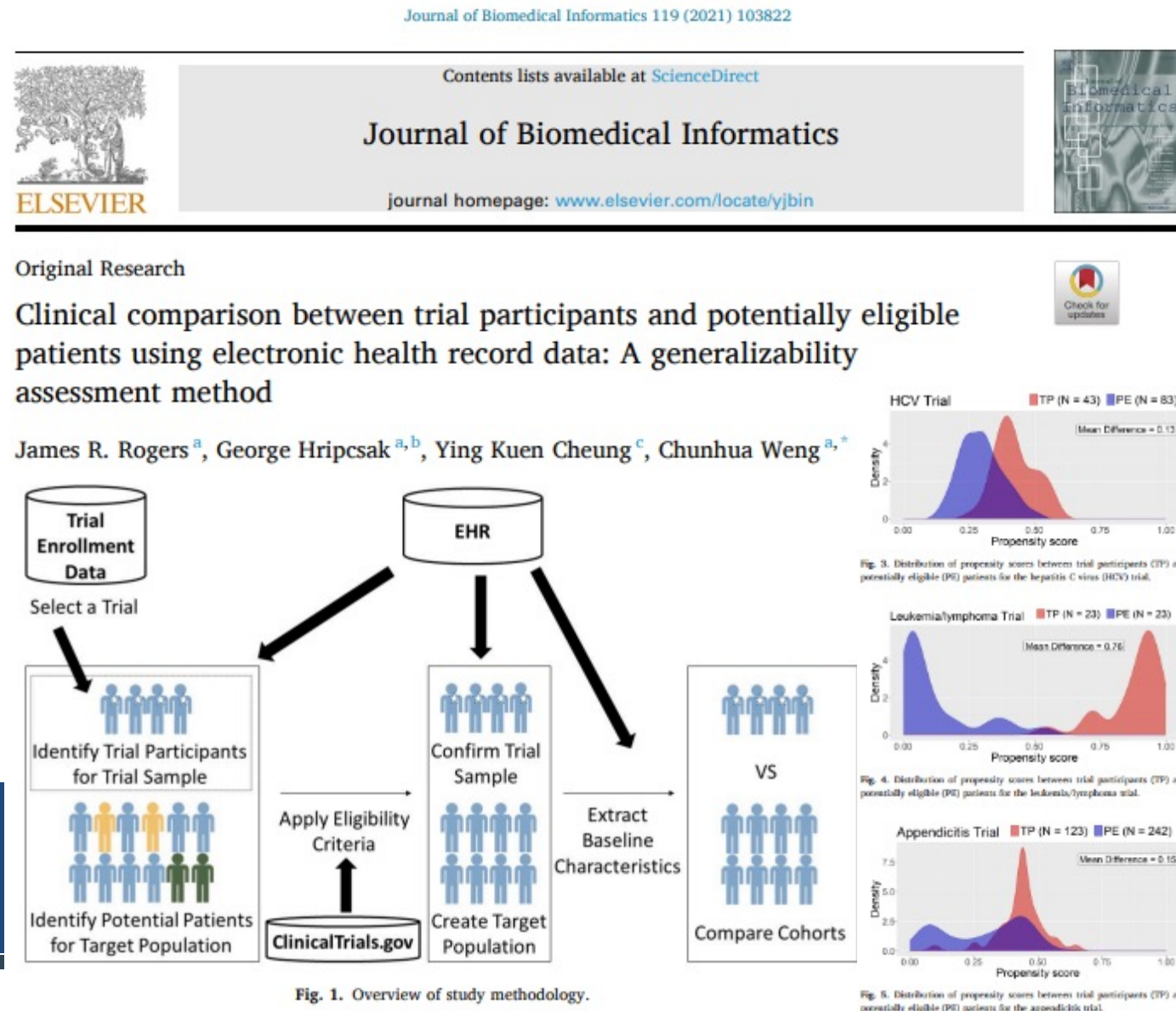




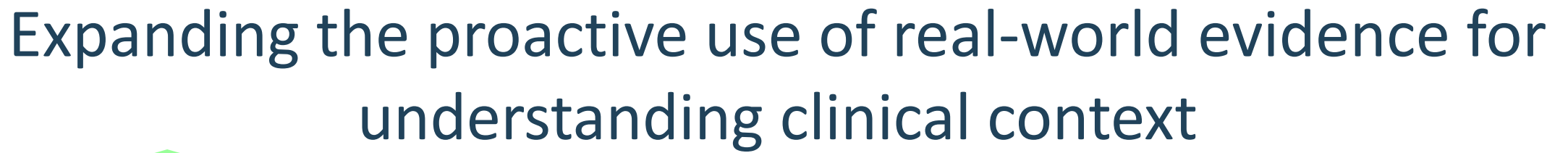
# Expanding the proactive use of real-world evidence for study planning and validity



Support the planning & validity of applicant studies







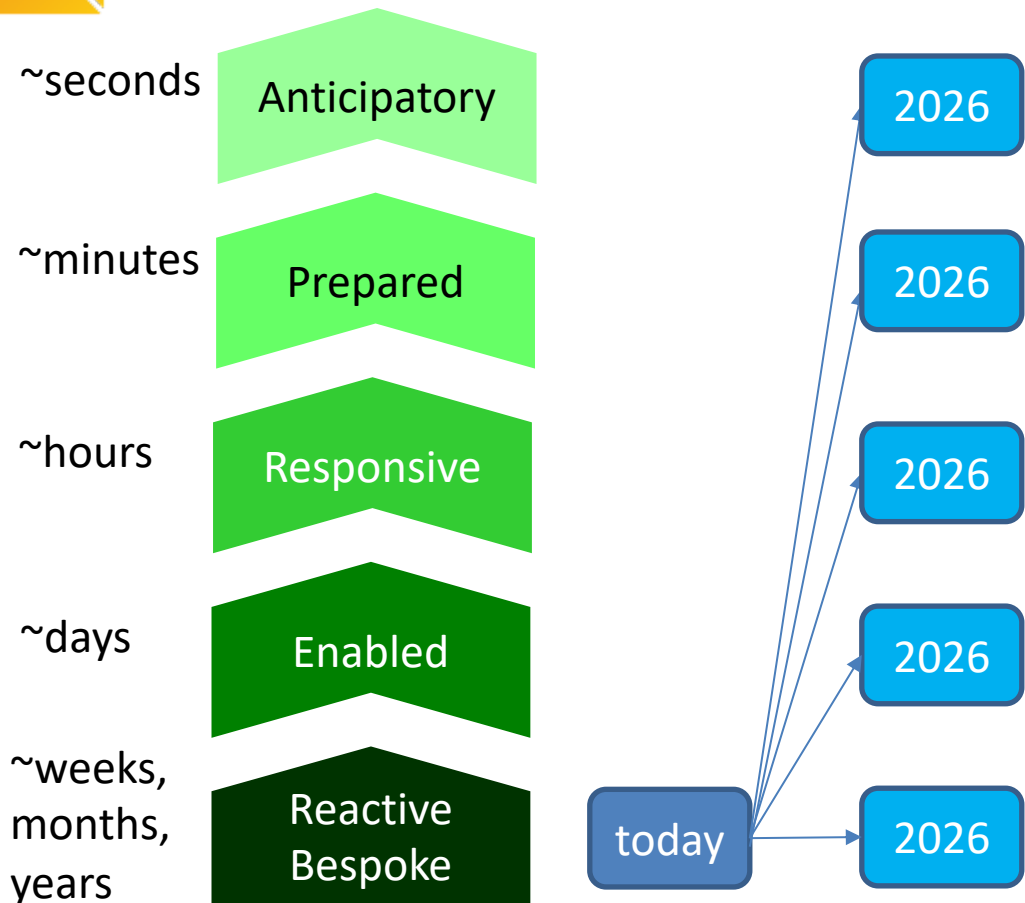
## Understand clinical context



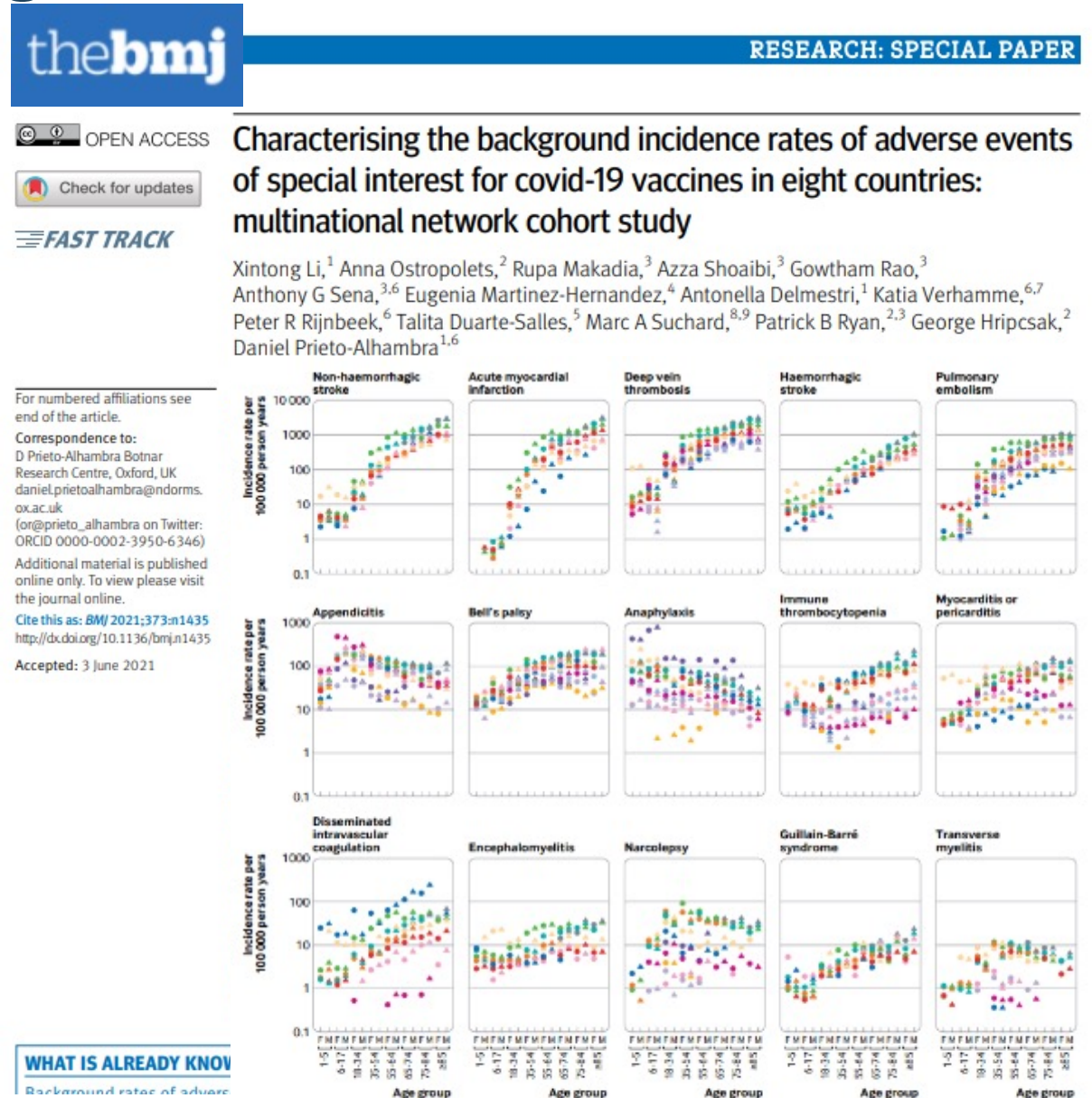
<https://data.ohdsi.org/Covid19CharacterizationCharybdis/>



# Expanding the proactive use of real-world evidence for understanding clinical context

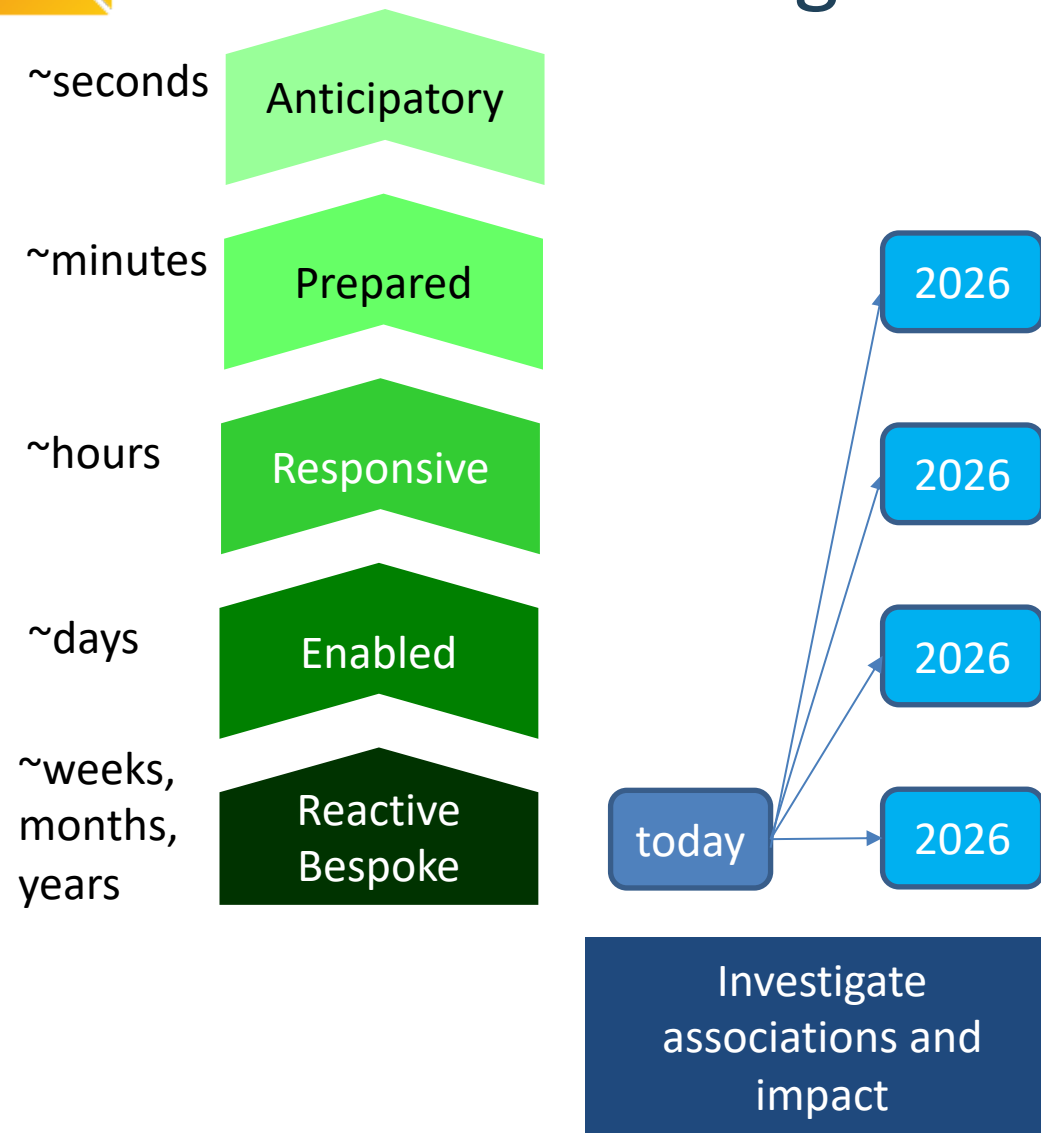


Understand clinical context





# Expanding the proactive use of real-world evidence to investigate associations and impact



THE LANCET  
Rheumatology

Articles

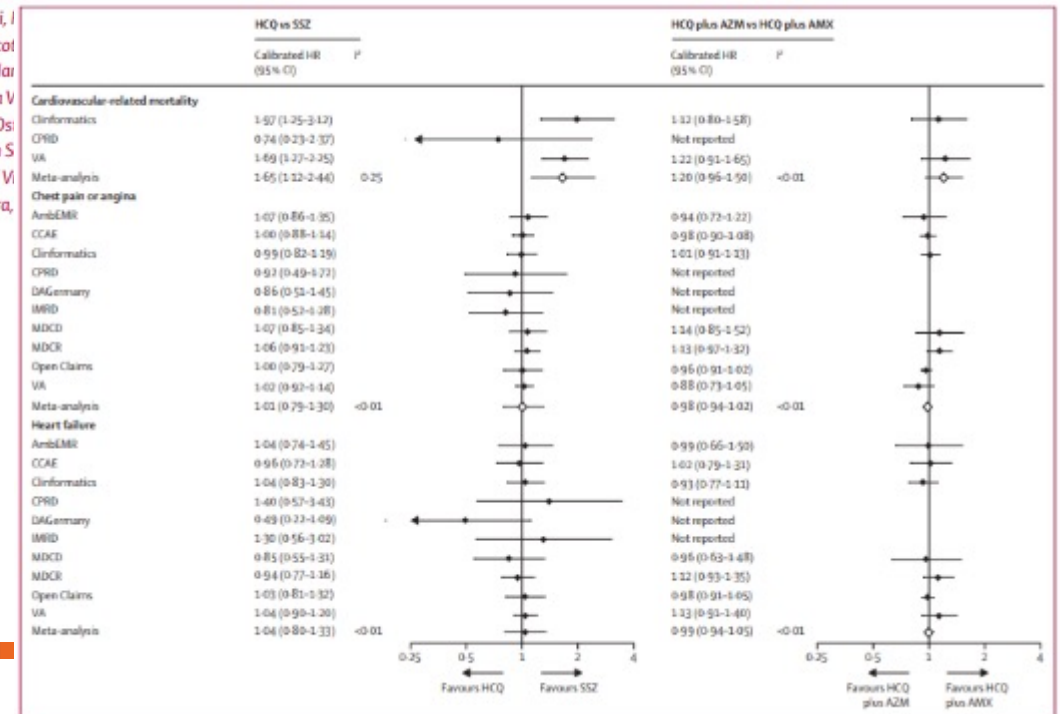
## Risk of hydroxychloroquine alone and in combination with azithromycin in the treatment of rheumatoid arthritis: a multinational, retrospective study



Jennifer C E Lane\*, James Weaver\*, Kristin Kostka, Talita Duarte-Salles, Maria Tereza F Abrahao, Heba Alqhouli, Osaid Alser,

Thamir M Alshammari, I Alexander Davydov, Scot Benjamin Skov Kaas-Hai Rupa Makadia, Andrea V Fredrik Nyberg, Anna Os Selva Muthu Kumaran S Carmen O Torre, David V Daniel Prieto-Alhambra,

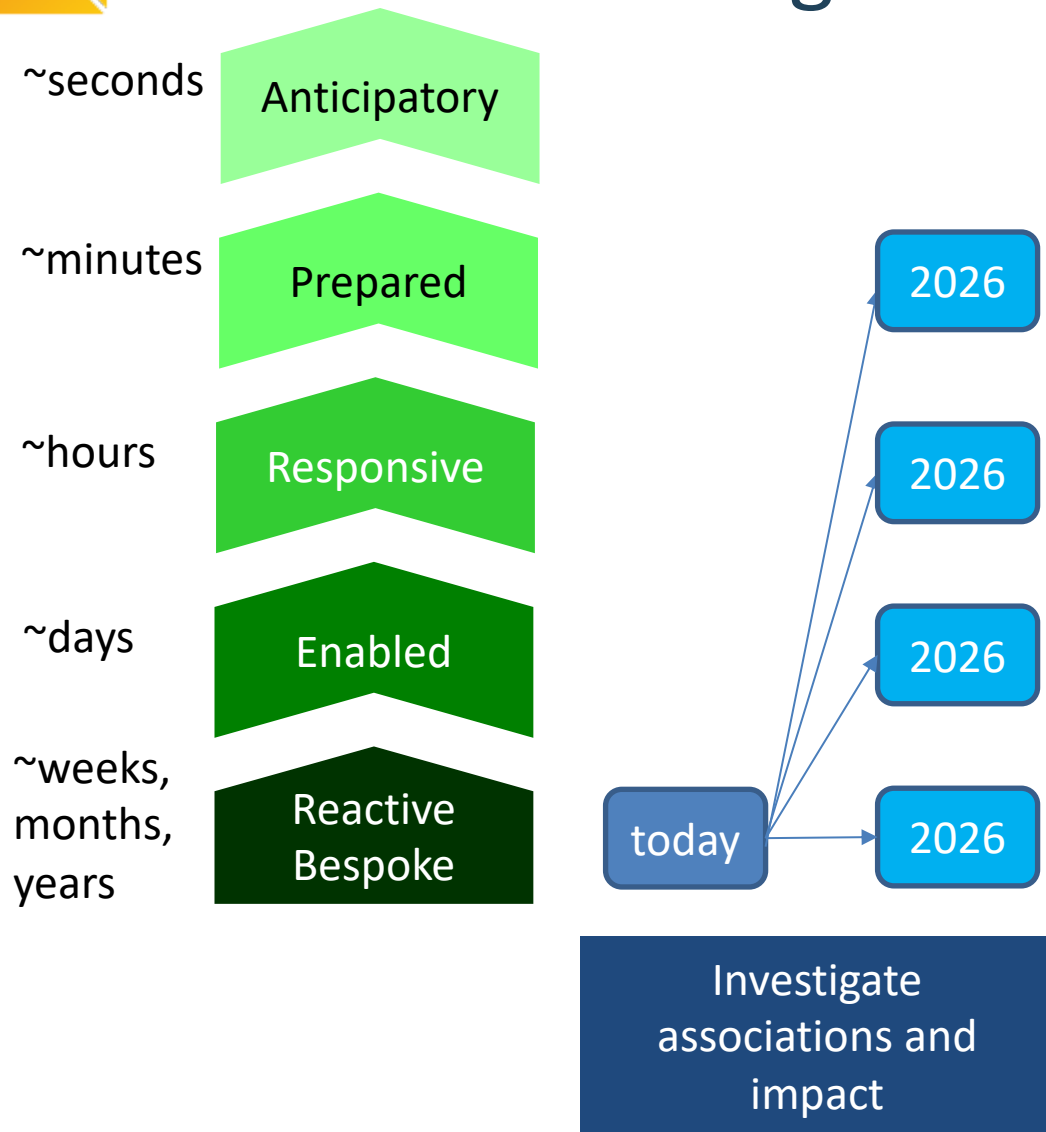
oa







# Expanding the proactive use of real-world evidence to investigate associations and impact



## RHEUMATOLOGY

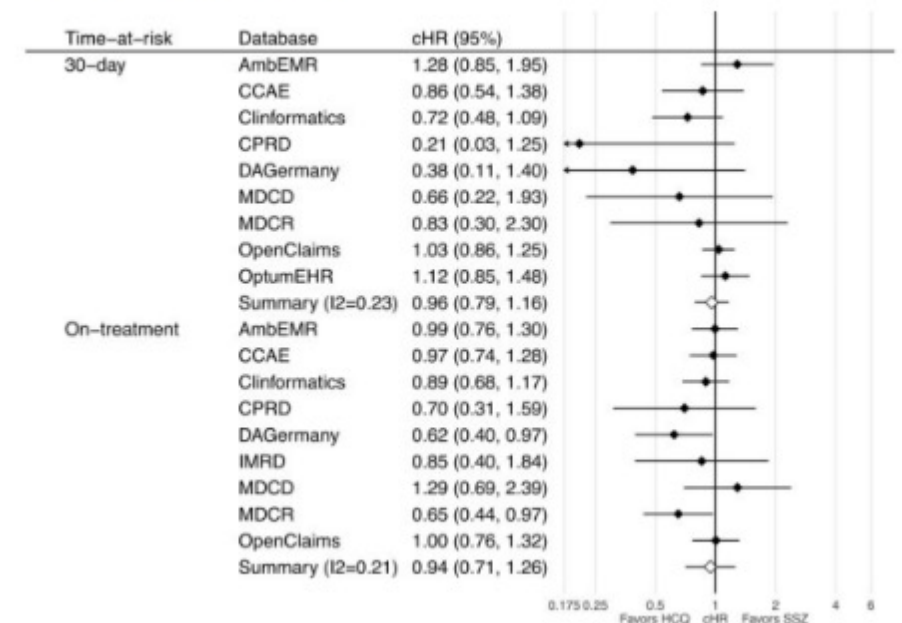
### Original article

## Risk of depression, suicide and psychosis with hydroxychloroquine treatment for rheumatoid arthritis: a multinational network cohort study

Jennifer C. E. Lane <sup>1,\*</sup>, James Weaver <sup>2,\*</sup>, Kristin Kostka <sup>3</sup>, Talita Duarte-Salles <sup>4</sup>, Maria

Thamir M. Als <sup>5</sup>, Juan M. Band <sup>6</sup>, Jill Hardin <sup>2</sup>, L <sup>7</sup>, Benjamin Sko <sup>8</sup>, Kristine E. Lyr <sup>9</sup>, Henry Morgan <sup>10</sup>, Fredrik Nyber <sup>11</sup>, Albert Prats-U <sup>12</sup>, Anthony G. Se <sup>13</sup>, Marc A. Such <sup>14</sup>, Junqing Xie <sup>1</sup>, Patrick Ryan <sup>2</sup>, consortium

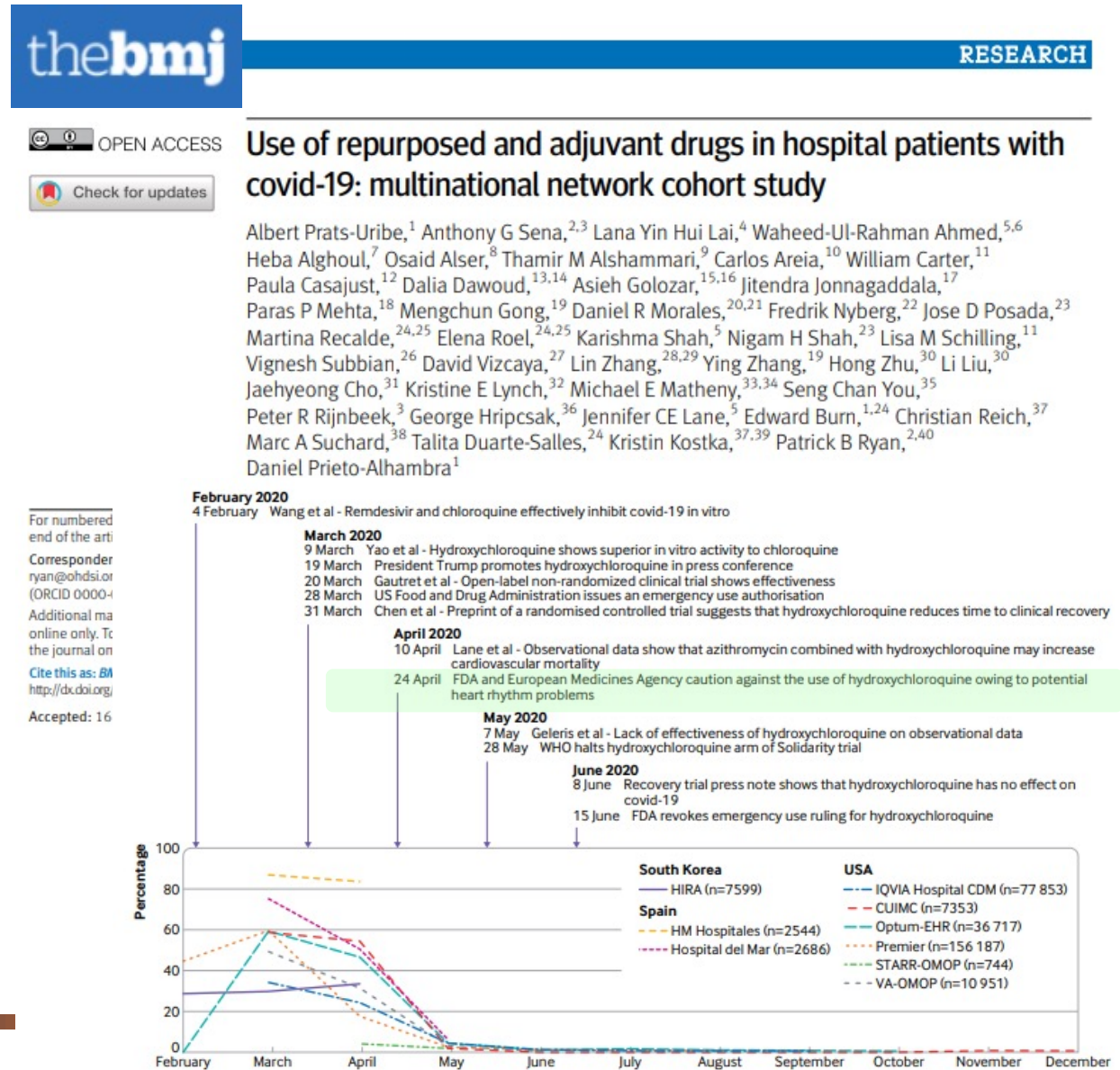
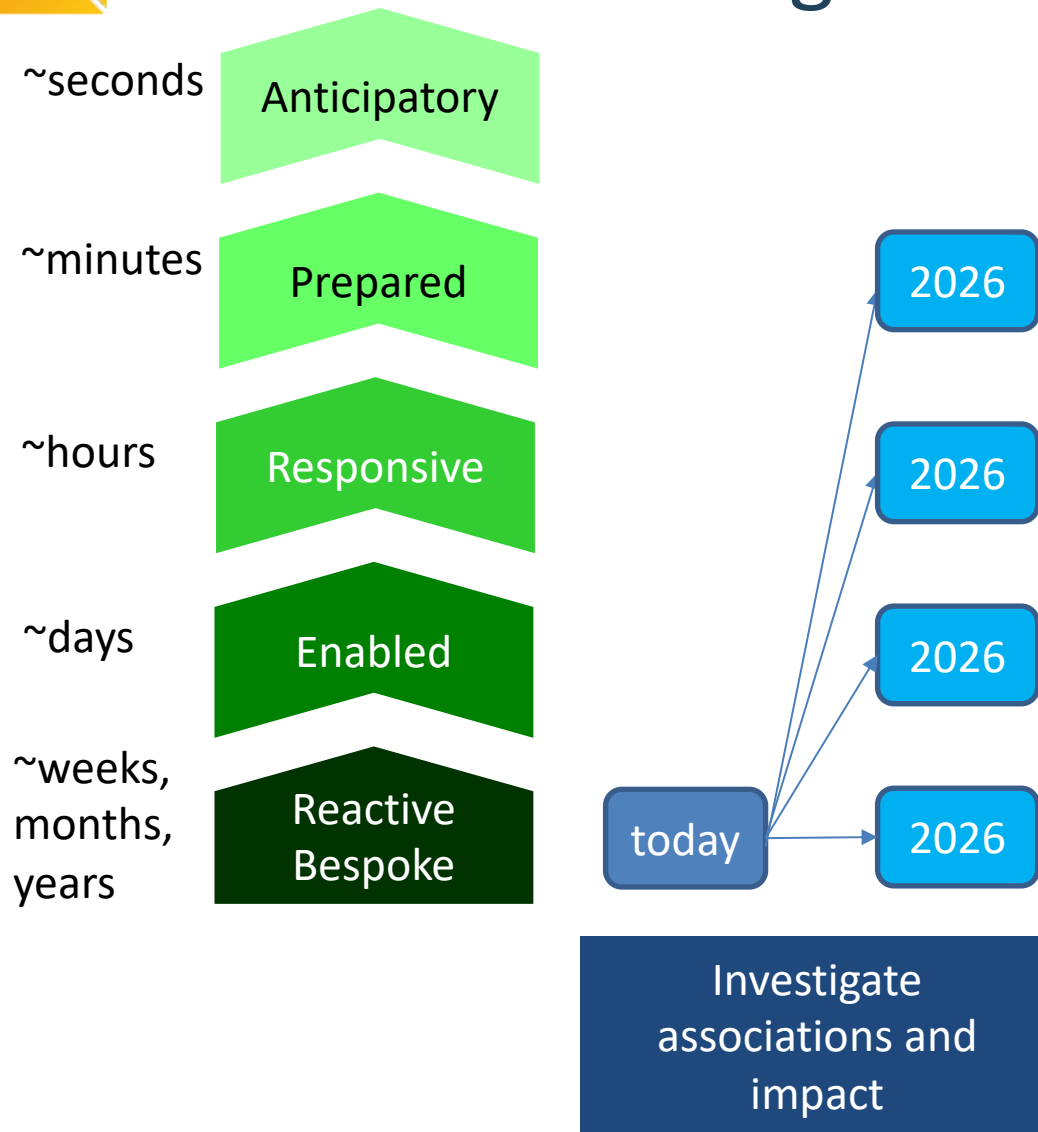
Fig. 1 Forest plot of the association between short- (top) and long-term (bottom) use of HCQ (vs SSZ) and risk of depression, by database and in the meta-analysis





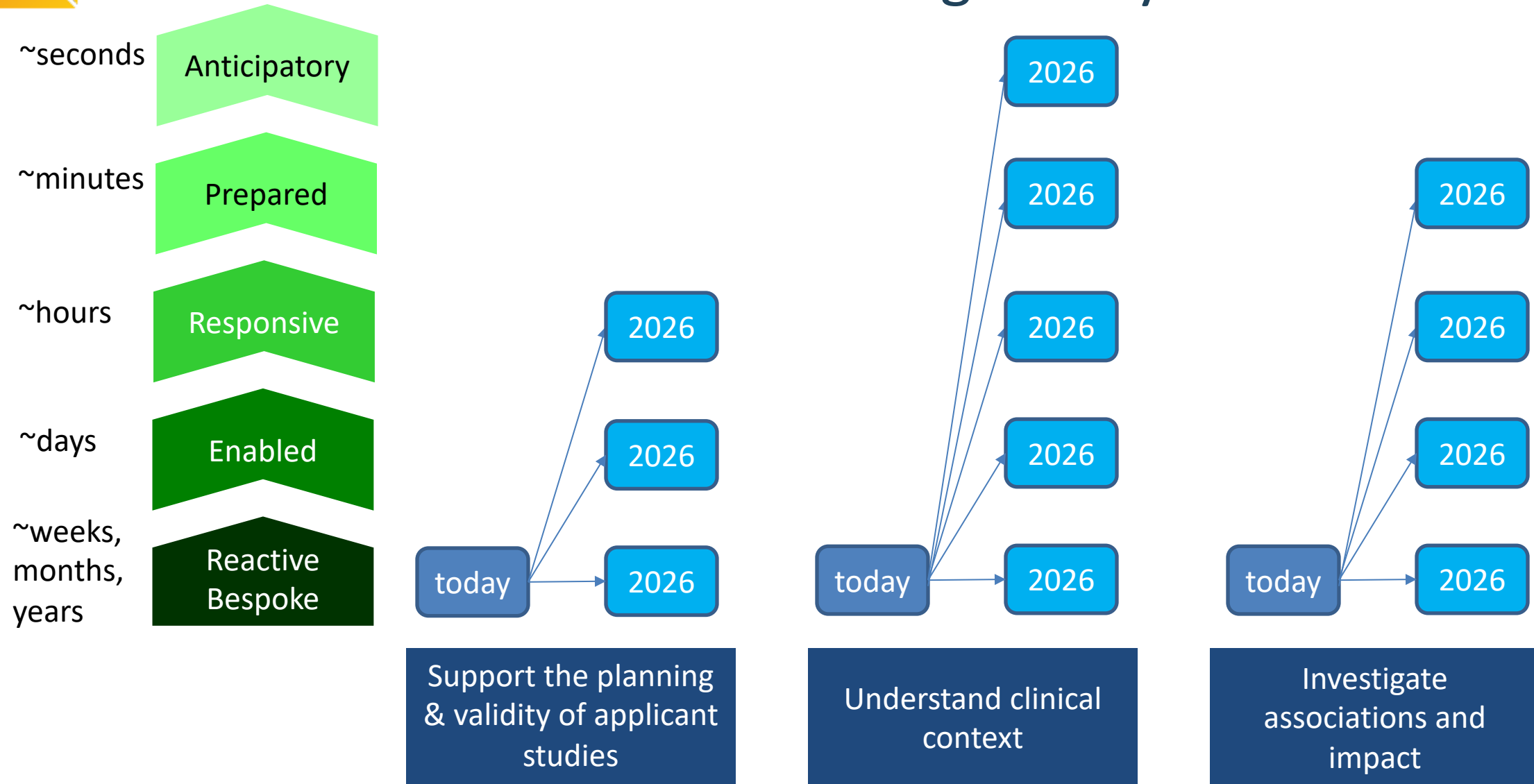


# Expanding the proactive use of real-world evidence to investigate associations and impact





# A 5-year vision for expanding the proactive use of real-world evidence across regulatory use cases





# Concluding thoughts

- Enabling use and establishing value of real-world evidence is a reasonable vision, which requires building trust across evidence generators and consumers
- People and processes need to be augmented with science, technology and engineering
- Community efforts today can enable a more proactive future tomorrow
  - Data network standardization and quality assessment
  - Design of standardized outputs for regulatory use cases
  - Standardized analytic tool development
  - Phenotype development and evaluation
- Open science systems that promote transparency and reproducibility can increase reliability and efficiency
- Regulatory use cases largely involve characterization analyses, have been demonstrated to be feasible, and are ready-to-scale