# Real-World Evidence: Tools to Support Innovation

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**Global Regulatory Policy** 

# Topics

- Fundamental of Real-World Data and Real-World Evidence for Regulatory Activities
- Global Real-World Evidence Instructure and Guidance Development
- Approaches to Advance the Acceptance of Real-World Evidence

## Growing Need for Evidence

**Evolution of Medical Products** 

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Expanding Sources of Clinical Data & Evidence

**Emerging Needs of Decision Makers** 



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# Fundamentals of Real-World Data and Real-World Evidence for Regulatory Activities

## **Real-World Data**

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

*"...sources other than traditional clinical trials"* 

	Complaints: MAUDE, Eudramed, and Company Databases
	Hospital Databases
	Electronic Health Records
<u>⊨</u>	Claims
	Registries
	Registries linked to claims/EHR
	Patient surveys, Surgeon surveys, PROs, Patient Preferences, wearables, sensors, social media
-//-	Device generated data
official second	Imaging, video, Al

## **Components of Real-World Evidence Guidances**



#### Transparency

**Data Collection** 

• Allowable data sources

Data set characterization

• Extraction, curation practices

• Define relevance and/or reliability

Data governance/ethics (e.g., consent)

- Posting/registering protocol
- Interactions between sponsor and authority
- Documenting data provenance
- Process for protocol changes
- Criteria for submitting an IDE or similar requirements

### Uses of RWD/RWE

- Pre, Post market
- Submission types (e.g., High to Low Risk, implantables, humanitarian/rare/orphan, pediatrics)
- Accepted uses (e.g., supplemental, primary clinical evidence)



### **Data Quality**

# 02

### Study Design

- Research question guidance
- Data methods (e.g., Common Data Model, data dictionary requirements, linkages between different sources)
- Analytical methodology (e.g., weighting, bias)

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### **Regulatory Bar Has Not Changed**

## Determining RWD "Fit-for-Purpose"

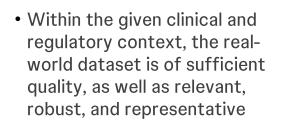


- Availability of key data elements
  - Exposure
  - Outcome
  - Covariate
  - Patient-level linking (if applicable)
- Representativeness
- Sufficient patients
- Continuity of coverage is adequate/longitudinal
- Follow-up period is long enough for outcomes to develop
- Coding standardization and ease of extraction





- Accuracy
- Validity
- Conformance
- Plausibility
- Consistency
- Completeness
- Provenance
- Transparency of data processing
- Auditability
- Understand impact of data errors



Fit-for-

Purpose

Data

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Source: Duke-Margolis Center for Health Policy White Paper: Characterizing RWD Quality and Relevancy for Regulatory Purposes (October 1, 2018). Available at <a href="https://healthpolicy.duke.edu/sites/default/files/atoms/files/characterizing\_rwd.pdf">https://healthpolicy.duke.edu/sites/default/files/atoms/files/characterizing\_rwd.pdf</a>); Janssen Epidemiology Presentation

# Design Considerations Using RWE for Regulatory Decisions

#### **General Principles**

- Get alignment with FDA on study design and analysis plan
- Separate analytic design from outcome analysis and use 2stage outcome-free analytic design process to maintain objectivity
- Pre-specification
- Address potential confounding using propensity score methods
- Conduct pre-specified sensitivity analyses to show consistent and robust results

submission

Pre-

Analytic Design • Develop study protocol and analysis plan and get alignment with FDA

- 2-Stage outcome-free design
- Stage 1
  - Estimate sample size
  - Pre-specify all study components such as baseline covariates, covariate balancing methods, endpoints, outcome analysis methods, non-inferiority margin, and success criteria.
- Identify an independent statistician with no access to outcomes for conducting covariate balancing between the study groups
- Stage 2
- Perform covariate balancing using pre-specified baseline covariates and propensity score methods by the independent statistician
- Achieve acceptable covariate balance

Outcome Analysis

Perform outcome analysis by different data analysts using covariate-balanced data

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References: Yue, Lu, and Xu. J Biopharm Stat. 2014;24(5):994–1010.; Lu N, Xu Y, Yue LQ. Stat Biopharm Res. 2020;12(2):155–163.

## **Research Methods Framework**

A pragmatic research methods framework in designing, implementing, and evaluating RWE studies of medical devices

• Background: Disease, Available Therapies, and Device Risk

- Device Description
- Study Specific Objectives
- Target Population, Patient Selection, and Source for Patient Recruitment
- Outcomes: Primary, Secondary, Procedural, and Device
- Patient Exposure to the Device
- Study Design
- Study Procedures
- Required Sample Size
- Study Registration
- Monitoring Plan
- Statistical Analysis Plan (SAP)
- Pre-specification of study design and analysis
- Justification for control of confounders.

Outline an RWE medical device **study protocol's key components** and **general principles to follow** and provide examples

# Emphasize **two key** principles

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Reference: https://nestcc.org/data-quality-and-methods/

DOI: 10.1002/pds.4297

#### **ORIGINAL REPORT**

Importance of Transparent **Research &** Reporting

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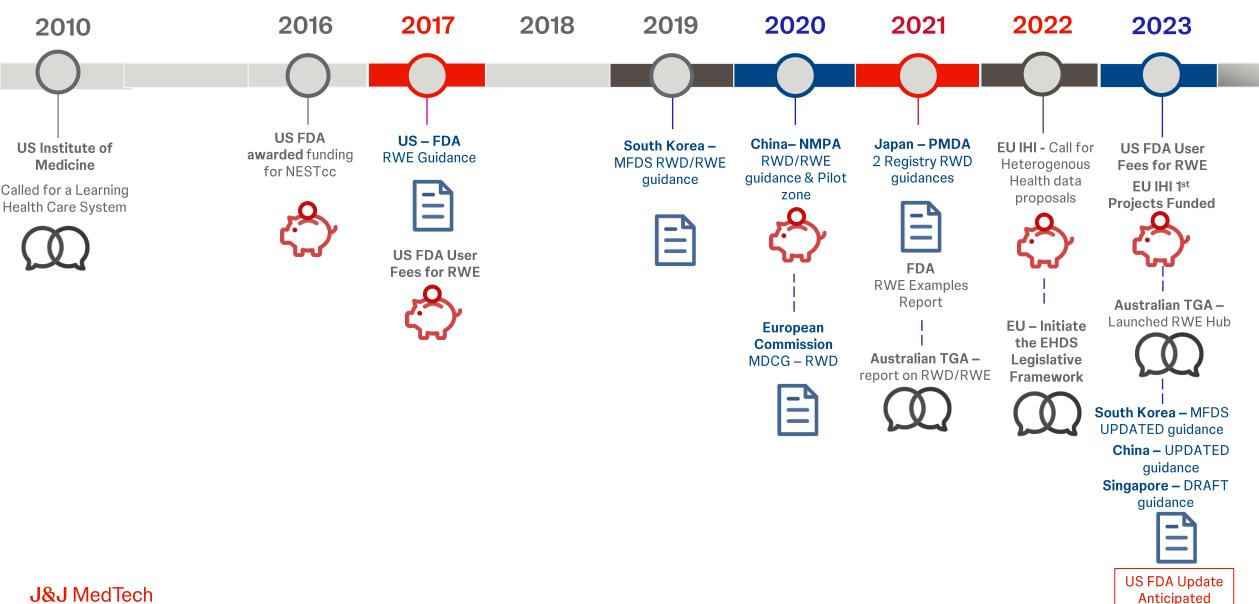
Good practices for real-world data studies of treatment and/or comparative effectiveness: Recommendations from the joint **ISPOR-ISPE Special Task Force on real-world evidence in health** care decision making

EMA/95098/2010 Rev.11

The European Network of Centres for Pharmacoepidemiology and Pharmacovigilance (ENCePP) Guide on Methodological Standards in Pharmacoepidemiology (Revision 11)

ENCePP: European Network of Centres for Pharmacoepidemiology and Pharmacovigilance ISPOR/ISPE: International Society for Pharmacoeconomics and Outcomes Research / International Society for Pharmacoepidemiology

# Global Real-World Evidence Instructure & Guidance Development



### **Timeline of Medical Device RWE Activities & Guidances**

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By end of 2023

## **Building on Related Global Harmonization Efforts**



- Integrating patient registries and innovative tools for enhanced medical device evaluation and tracking (Closed)
- Medical Device Clinical Evaluation (Closed)
- Clinical Evidence for IVD Medical Devices (Closed)
- Unique Device Identification (UDI) Application Guide & the Roadmap for implementation of UDI system (Closed)



 International Harmonisation of Real-World Evidence Terminology and Convergence of General Principles Regarding Planning and Reporting of Studies Using Real-World Data, with a Focus on Effectiveness of Medicines

# Approaches to Advance the Acceptance of Real-World Evidence

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### Collaborations Pave the Way to Advance RWE Acceptance

**Clinical Societies Patient Organizations Public-Private Partnerships Trade Associations Academics** 

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15\$36.00 - see front matter © 2017 Published by Elsevier Inc. on behalf of In

Outcomes Research (SPOR).

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BMJ Open EU-funded initiatives for real world evidence: descriptive analysis of their characteristics and relevance for regulatory decision-making

Kelly Plueschke,<sup>1</sup> Patricia McGettigan,<sup>1,2</sup> Alexandra Pacurariu,<sup>1,3</sup> Xavier Kurz,<sup>1</sup> Alison Cave<sup>1</sup>

wooduction A initiatives linked to 'Real World Evidence' (RWE) was erformed to determine whether their outputs could be ed for the generation of real-world data able to su Recision-making, 8MZ/Open 1018;8:e021864, doi:10.11 e European Medicines Agency (EMA)'s regulatory Method The initiatives were identified from public wailable websites. Their topics were categorised into Prepublication histo five areas: 'Data source', 'Methodology', 'Governand nodel', 'Analytical model' and 'Infrastructure'. To asse oper are available only less these files, plasse org/10.1136/tamjapan-2018-02186-40. ted for EJ approval in 2016 and those i Received 24 January 2018 Revised 26 March 2018 Results Of 171 originally identified EU-funded initiatives, 65 were selected based on their primary an condary objectives (35 'Data source' initiatives, 15 Methodology', 10 'Governance model', 17 'Analytics nodel' and 25 'Infrastructure'). These 65 initiatives ceived over 734 million Euros of public funding. A the time of evaluation, the published outputs of the 40 impleted initiatives did not always match their original entires. Overall, public information was limited areas of the products recommended for approval in 2016 and 8 of 15 therapeutic areas in the 2017-2019 pharmaceutical business pipeline. Haematology, istroenterology or cardiovancular systems were noor represented. Conclusions. This landscape of EU-tunded initiative

inked to RWE which started before 31 December 2016 highlighted that the immediate utilisation of heir outputs to support regulatory decision-making is imited, often due to insufficient available infor and in discremancies behavior outruits and objective projects focussing on the same therapeutic areas crease the likelihood of duplication of both efforts and one. These issues contribute to ease in momenti-

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European Union-funded initiatives linked to 'R World Evidence' that looks at their usefulness

clinical evidence collected for th narketing authorisation of new medi ines traditionally comes from randomise clinical trials (RCTs) but it is recognised that RCT data have limitations including tightly controlled conditions of clinica are, highly selected populations and, ir some acenarios, small sample sizes.1 As a result, their applicability to the safety an efficacy of medicines in postauthorisation

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DEFINING RWE

#### Harnessing the Power of Real-World Evidence (RWE): A Checklist to Ensure Regulatory-Grade Data Quality

Rebecca A. Miksad1 and Amy P. Abernethy1

#### The role of real-world evidence (RWE) in regulatory, drug devel- RWE QUALITY

opment, and healthcare decision-making is rapidly expanding. Credible RWE is generated from high-quality data that are Recent advances have increased the complexity of cancer care and widened the gap between randomized clinical trial (RCT) results and the evidence needed for real-world clinical decisions. patients treated outside of clinical trials can help fill this void.

RWE is derived from the data of patients treated in real-world

settings. The surge of electronic health records (EHRs), as well as

ther technologies, enables researchers to better understand the

real-world nationst experience. EHR-derived data can be

combined with other data sources such as administrative claims,

genomic information, and mortality datasets to create a more

develop rigorous guidance for translating real-world data (RWD) into actionable and meaningful RWE.

aplete description of a patient's cancer journey. It is crucial to

1) obtained from relevant RWD sources, 2) cleaned, harmonized and linked to fill in gaps, and 3) include endpoints. Quality criteria need to encompass the entire process to generate RWE, Instead of remaining invisible, data from the >95% of cancer from data sources and processing to defining appropriate use cases (Figure 1) The optimal RWD source depends on the RWE hypothesis

and purpose.3 As the EHR is a contemporaneous (prospective or retrospective) account of the clinical narrative, it provides contextual details and longitudinal follow-up for outcomes. The completeness of EHR data depends on clinician work-flow, care location, and patient factors. Missing data may need to be filled by using alternative data sources: for example, claims data may provide evidence of emergency department visits but not docu nted in clinic notes

Each type of RWD source has well-documented limitations the absence of clinical results and endpoints in claims data; lim ited follow-up and reliability in patient registries; and selection bias and secu rity concerns for smartphone weatables data. They

Real	world	evidence:	experience	and	lessons
rom	China				

Xin Sun and colleagues discuss the development of real world evidence in Chinese he and propose strategies to improve its quality and usefulness

ldwide, real world common harms, given evidence has become a topic of broad interest in randomisation in b real world studies unknown prognostic fac Praematic clinical trials healthcare. Its definition, studies can provide im rying, may include mu however, has not achieved when we want to asse as helow As an umbrella term, real ncommon events, an world evidence comes from a spectrum of that involve interactions studies that apply various epidemiological methods to data collected from real world tive data collection terventions, or gen Disease registrie further testing. Patient surveys attings,<sup>4</sup> Real world data can be derived Traditional cohort studies from a wide range of sources, such as routine Data collected from mobile devices ealthcare (eg, electronic medical records), In China, the concept of re rvational studies using exis raditional epidemiological studies (eg, clasarose from awareness of t ical cohort studies), surveillance (eg, sponadministrative data traditional clinical trials onic medical meous adverse drug events monitoring), additional evidence to Medical claims data administrative databases (eg. death regispractice and policy deci · Birth or death registri 1002, the Chinese Mi ters, medical claims), or personal devices eg, regular blood pressure measured with Surveillance database Social Security hosted and taneous adverse drug eve obile devices). Study designs are generally on the use of insurance of lassified into three categories: pragmatic formulary decision and nh linical trials, which may or may not be ranomised; observational studies involving and pharmacovigilance," payment and The term "real work coverage decisions," healthcare quality not explicitly used up ospective collection of data; and observaimprovement,' new indications of medical researchers from trad onal studies using retrospective adminisative databases (box 1). products," assessment of healthcare medicine carried out a Real world evidence can be used technologies," and clinical practice to evaluate traditional C for developing medical products and guideline development." In addition, the interventions, mainly to a informing healthcare practice and policy making. Examples of its uses include abundance and diversity of data allows exploration of clinical research questions then, the Chinese rese upport for identification of unmet medical other than healthcare interventions, such has started to embi eeds,' design of registered clinical trials," as disease burdens, prognoses, and clinical and has adopted the s post-approval drug safety assessment predictions. the international res-A common misunderstanding is that although some terms, traditional randomized controlled trials do research and compa not reflect the real world setting, and that research, which sha all observational studies are real world.1 concepts, have also se Real world evidence has gained with in fact, randomised controlled trials may used."<sup>11 in</sup> For instance, t attention in China in the past few include components of real world settings Doctor Association be (eg, broad eligibility criteria and pragmatic outcomes research in 20 Disease registries and retrospecti trials)11, and real world studies may have observational studies to databases are the two main types of real world studies in the China; limited ments that are not part of regular care of healthcare interve (eg. intensified follow-up). Instead of a Chinese Evidence-based resources are available for pragmatic dichotomy there is a continuum in the organised a national study features of traditional randomised world evidence to explain Use of real world evidence for controlled trials and real world studies, introduce methods of rea healthcare practice and policy deciwith external validity increasing as more the Chinese audience. In sions is limited at present, although real world features are included in the hosted a national aca there are a few important governuse of real world evid design. Some also argue that observational decision making To advance the real world evidence studies have advantages over randomized In fact, efforts to ge novement. China must develop an introlled trials in assessing the "real evidence started far ea

### of Real-World Evidence

September 13, 2017

### A Framework for Regulatory Use

Duke MARGOLIS CENTER

n specific circumstances, real-world evidence can ntribute to a fuller understanding of the benefit and risks of medical device use in patients in realworld clinical practice, as a means of supporting regulatory decision making. The US Food and Drug Administration (FDA) recognizes the wealth of data available from clinical experience, and ongoing efforts to balance premarket and postmarket data collection and consider the potential benefits and risks represen an attempt to streamline the regulatory approval pro-cess while generating robust and meaningful evidence to support the safety and effectiveness of devices.

Interventional Devices Branch BY ELENI WHATLEY AND MISTI MALONI

Mobilizing mHealth

**Evidence** Generation

**Submissions** 

Innovation for Real-World

**Current Considerations** 

on Real-World Evidence

Examples and decision making from the Center for Devices and Radiological Health's Peripheral

Use in FDA Regulatory

As currently defined by the FDA, real-world data are data relating to patient health status and/or the delivery of health care that are routinely collected from a variety of sources, which can include data derived from electronic health records, claims and billing information, product and disease registries, patient-generated data including home-use settings and other sources. Real-world evidence is the clinical evidence regarding the usage and potential benefits or risks of a medical product derived from analysis of real-world data.

The use of real-world evidence has many potential benefits, including swifter identification of safety problems following the introduction of a device into the general marketplace, the ability to better understand the benefit-risk profile of devices, and the reduction

both marketing approval as well as postmarket surve ance. As noted in the real-world evidence guidance document, a good example where real-world evidence may be valuable is for the expansion of the indication when the studied indication is similar to the appro indications (eg, longer lesion lengths, specific lesion types).1 This strategy has successfully been employ

of time and cost of evidence generation to support regulatory submissions. However, there are also som potential limitations that may discourage the use of real-world evidence as a primary source of clinica evidence, which may include data relevance, qualit iability, and bias.<sup>1</sup> Because of these factors, can consideration is needed when determining th appropriateness of using real-world evidence to su sions. In this article, we provide imples of when the use of real-world evide either pre- or postmarket, has adequately support the expansion of indications of previously approve eripheral vascular devices.

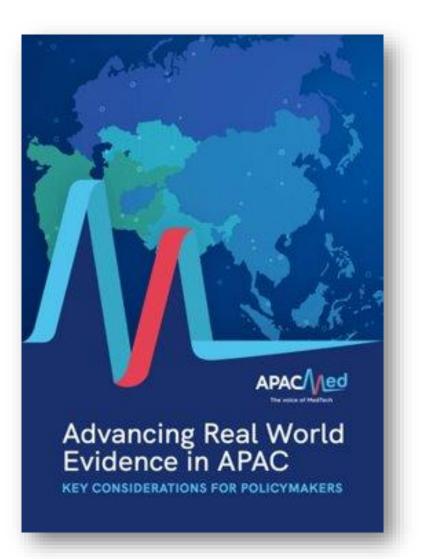
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PREMARKET USE OF REAL-WORLD EVIDENCE The Perinheral Interventional Devices Branch of the Division of Cardiovascular Devices at the FDA has co sidered real-world evidence sufficient to support the

approval of several recent regulatory submissions for





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The Power and Promise of Health Data Value for Innovation, Quality, and Efficient Care

Advancing Data Access, Sharing, and Transfer Policies for the MedTech Industry in the Asia-Pacific Region

August 2023



APACMed policy position paper: https://apacmed.org/content/uploads/2022/03/Advancing-Real-World-Evidence-in-APAC.pdf \*

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## Multi-Stakeholder Partnerships and Collaborations



<u>CIIN</u> Clinical Innovation Network



海南自由贸易港 博鳌乐城国际医疗旅游先行区 HAINAN FREE TRADE PORT BOAO HOPE CITY

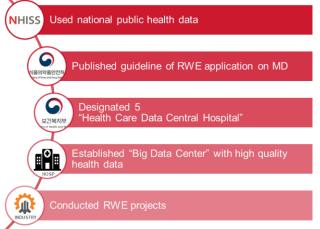


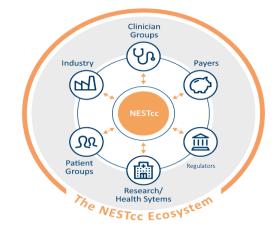


IDERHA integrating health data

MDICAL DEVICE

### **South Korea**





# Advancing Regulatory Science and Evidence Drives Innovation



Innovation in Evidence Generation is Critical

- Global market quickly evolving
- Capturing the patient's experience and care pathway
- Improving the evidence portfolio to be more diverse and representative of all our patients



Importance of Appropriate Access to Real-World Data

- Conduct robust research
- Development of Digital Health Innovations



Real-World Evidence is an Enabling Tool

- Innovative Regulatory Pathways: Orphan, Pediatric and Rare diseases
- Innovation in clinical care and technology



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# 감사합니다 Natick Danke Ευχαριστίες Dalu NThank You Köszönöm Tack Спасибо Dank Gracias 射 Merci Seé ありがとう