

# **Hot Topic**

# Emerging use of real-world data to address data gaps in clinical pharmacology: Opportunities and challenges

17 October 2022

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# Outline

- RWE in headlines
- RWE in scientific literature
- 21<sup>st</sup> Century Cures Act
- RWD vs RWE
- Types of RWD
- Data elements commonly available in RWD
- Study designs related to RWE
- Evidence standards with RWE
- FDA approvals based on RWE
- Examples / Case studies



# Real world evidence seems to be everywhere recently

# US FDA's Stein 'Excited' About Real-World Evidence, Rare Disease Endpoint Pilot Programs

14 Sep 2021 ANALYSIS

## Real-World Evidence Deemed Essential For Breakthrough Designations

30 Sep 2021 | NEWS

Tech

## Industry Voices—COVID-19 vaccine rollout shows real-world evidence was ready for the spotlight

by Carolyn Magill, Aetion | Oct 5, 2021 3:30pm

## Real-World Evidence Will Take Center Stage At US FDA Advisory Committee On COVID Boosters

15 Sep 2021 NEWS

# How 'Real World Evidence' is Revolutionizing Healthcare

Extracting untold insights with RWE can assist medical professionals evaluate the efficacy of a drug or medical invention. It's time to dig deeper.

Aug 11, 2021, 08:30am EDT | 1,083 views

## Will Real-World Evidence Replace Clinical Trials?



Morris Panner Forbes Councils Member Forbes Technology Council COUNCIL POST | Membership (Fee-Based) Innovation

# RWE Alliance aims to boost policies and practices around real-world evidence

Five analytics companies – Aetion, Flatiron Health, IQVIA, Syapse and Tempus – are joining to advance use of data derived from EHRs, claims and other sources outside of clinical trials.

By Mike Miliard | May 20, 2021 | 03:50 PM



Real World Evidence Solutions Market worth \$2.3 billion by 2026 - Exclusive Report by MarketsandMarkets™



Real-World Evidence (RWE) Solutions Market Worth \$3.13 Billion by 2027- Market Size, Share, Forecasts, & Trends Analysis Report with COVID-19 Impact by Meticulous Research®

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Meticulous Market Research Pvt. Ltd. September 23, 2021 · 9 min read

September 12, 2022 7:30 PM | 7 min read

NEWS PROVIDED BY

Aug 05, 2021, 11:30 ET

MarketsandMarkets ----

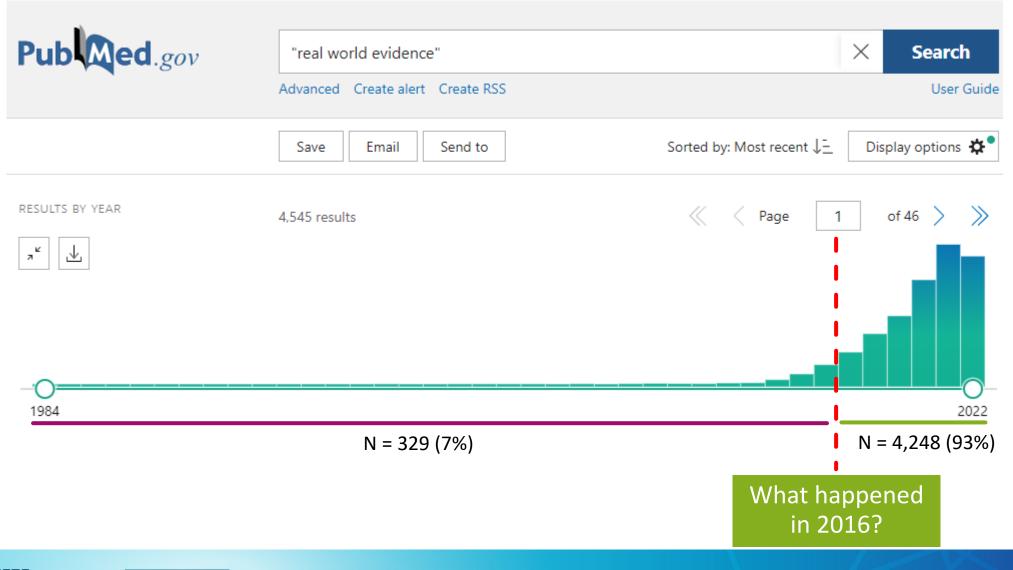
The real world evidence (RWE) market is projected to be worth USD 4.5 billion by 2030, growing at a CAGR of 15%, claims Roots Analysis

Real World Evidence Solutions Market to Reach USD 5 Billion Globally by 2031 at 13.7% CAGR, Says Allied Market Research

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# Volume of scientific literature related to RWE is booming





# 21<sup>st</sup> Century Cures Act

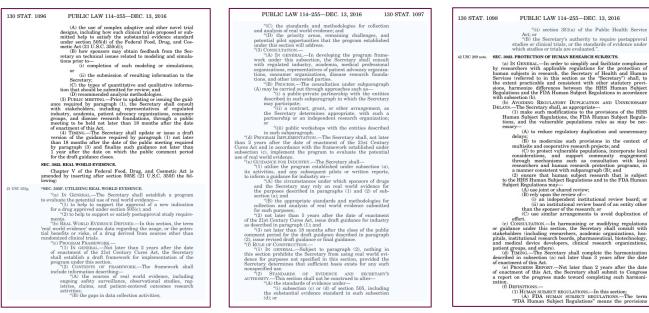


- Legislation passed on December 13, 2016
- Instructed FDA to evaluate use of RWE in drug approval process and:
  - 1. Develop framework for using RWE in drug approvals within 2 years
  - 2. Draft guidance on using RWE in drug approvals within 5 years
  - 3. Pursue RWE partnerships with industry, academia, professional organizations, etc.
- Act provided marching orders for FDA and prompted stakeholders to start preparing for future in which RWE is used in drug approvals



## Full Act is 312 pages long

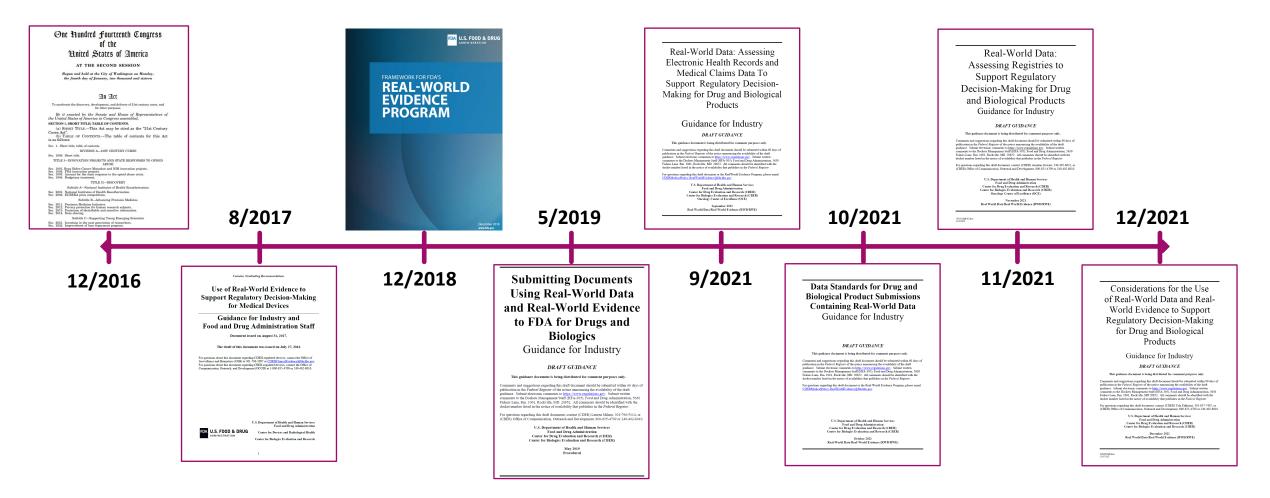
OCT 2022



## Section on RWE is only 2 pages and worth reading

#Phop መይር 360 PS (congress.gov)

# Regulatory guidance on real world evidence in the US



Note: Similar efforts for RWE also in development at EMA, MHRA, PMDA, Health Canada, etc.



# **RWD vs RWE**

## **Real world data**

Data relating to patient health status and/or delivery of health care routinely collected from a variety of sources

- Medical claims and billing
- Electronic health records
- Patient/product registries
- Patient surveys





#### Reference https://www.fda.gov/media/120060/download

Types of RWD	Source	Туре	Subtype	Examples	-
	Administrative	Third-party payer claims	Closed networks	IBM MarketScan, IQVIA PharMetrics, Optum Clinformatics	-
			Open networks	IQVIA LAAD, DRG RWD, Symphony IDV	
			Government	CMS FFS Medicare, Medicaid, VA/DOD	
		Hospital chargemaster		Premier, Vizient, IQVIA CDM	PREMIER
	)	Pharmacy		Surescripts, IQVIA NDTI	<del>Ş</del>
	'				Cerner
					PointClickCare <sup>®</sup>
3	)				
Clarivate Analytics	/				ontada
TriNetX					
<b>OM1.</b> *	)				healthverity
labcorp					🧿 DATAVANT
Quest Diagnostics 5	)				<b>♦ komodo</b> health <sup>™</sup>
<b>Pharm</b> Sci 300					Slide 9

# Data elements commonly available in RWD

	Variable
P	Age
t i e	Sex
	Race / ethnicity
n t	Insurance coverage / type
н	Identifier
C	Specialty
Ρ	Location
V i	Date
s	Procedure codes
t	Diagnosis codes
	Generic / brand name
R	Description (eg, strength, formulation)
x	Quantity (eg, number, days supply)
	Indication (reason for prescribing)
N	Measurements (eg, vitals)
o t e s	Observations (eg, notes)
	Rationale (eg, reason for prescribing)
	Description
T e	Code (eg, LOINC)
s	Results



# Study designs related to RWE

Concept	Description
Single-arm study	<ul> <li>Prospective study with 1 arm in which all participants receive therapy</li> <li>Often paired with external control group</li> </ul>

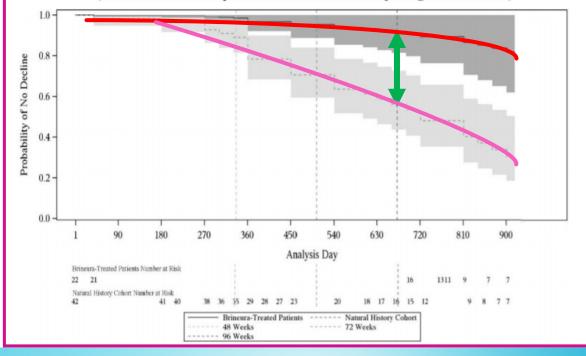


# **FDA** approvals based on RWE

## New product

BRINEURA (cerliponase alfa) was approved for Batten disease (rare genetic condition) based on single-arm, nonrandomized, dose-escalation study on LOA compared to natural history using RWD (ie, registry)

Figure 7. Estimated Time to Unreversed (Sustained) 2-Category Decline or Unreversed Score of Zero in Motor Domain for Symptomatic Pediatric Patients in the Brineura Single-Arm Clinical Study with Extension and for Patients in a Natural History Cohort (Based on the Cox Proportional Hazards Model Adjusting for Covariates)





## New indication

IBRANCE (palbociclib) was approved for male breast cancer based on analyses of EHR data from Flatiron, health insurance claims from IQVIA, FAERS, literature, and a safety database

#### CLINICAL CANCER RESEARCH | CCR DRUG UPDATES

# FDA Approval Summary: Palbociclib for Male Patients with Metastatic Breast Cancer



Suparna Wedam<sup>1</sup>, Lola Fashoyin-Aje<sup>1</sup>, Erik Bloomquist<sup>1</sup>, Shenghui Tang<sup>1</sup>, Rajeshwari Sridhara<sup>1</sup>, Kirsten B. Goldberg<sup>2</sup>, Marc R. Theoret<sup>1,2</sup>, Laleh Amiri-Kordestani<sup>1</sup>, Richard Pazdur<sup>1,2</sup>, and Julia A. Beaver<sup>1</sup>

- Approved by FDA in 2016 for women with breast cancer
- Pivotal trials excluded male participants
- Product was used off-label in males with breast cancer
- RWD was submitted to FDA in sNDA
- Label was expanded in 2019 to include males

# **Evidence standards with RWE**

## **RWE for regulatory decisions**

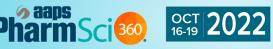
- Governed by 21<sup>st</sup> Century Cures Act
- FDA still requires <u>substantial evidence</u> from adequate and well-controlled investigations
- If evidence standards cannot be lowered, RWE must be elevated to reach them

Common features of regulatory approvals based on RWE:

- Indication is rare
- Primary endpoint is objective
- Natural history is well understood
- No change in standard of care
- Observed effect size is large

## **RWE for internal decisions**

- Not impacted by 21<sup>st</sup> Century Cures Act
- "Use of RWD to improve efficiencies of drug development programs that rely primarily on traditional clinical trials is already well established and generally encouraged by FDA"
- Potential uses of RWD to plan traditional RCT
  - 1. To assess enrollment criteria and trial feasibility
  - 2. To support selection of trial sites



# **Case Studies**

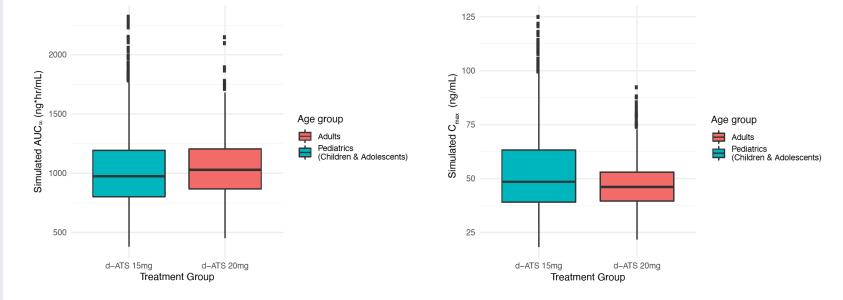


Case Study 1:	Model based pediatric exposure extrapolation for a dextroamphetamine transdermal system: a common use of real world data in clinical pharmacology ( <i>Castelli et al. American Society of Clinical Psychopharmacology</i> , 2022)
Problem	<ul> <li>Define doses of the dextroamphetamine transdermal system in children and adolescents which achieve exposures similar to adults.</li> </ul>
Data Sources	<ul> <li>National Health and Nutrition Examination Survey (NHANES) database (https://www.cdc.gov/nchs/nhanes/index.htm)</li> <li>Controlled clinical trial data in adults</li> </ul>
Use of RWD	<ul> <li>Demographic covariates were sampled from the NHANES database and incorporated into a population pharmacokinetic model in order to create realistic Monte Carlo simulations of pediatric populations.</li> <li>Candidate transdermal doses were evaluated and compared with prior data from adults.</li> </ul>
Results	<ul> <li>Exposure was dependent on body size (body weight)</li> <li>A pediatric transdermal dose of 15 mg produced comparable exposures to 20 mg in adults.</li> </ul>



# Case Study 1: Model based pediatric exposure extrapolation for a dextroamphetamine transdermal system: a common use of real world data in clinical pharmacology (*Castelli et al. American Society of Clinical Psychopharmacology, 2022*)

Figure 3. Simulated amphetamine exposures for pediatric patients at d-ATS 15 mg and adult patients at ATS 20 mg



Median values are designated by a line in the center of the boxes. Boxes indicate the inter-quartile range (IQR). Whiskers represent 1.5\*IQR, and outliers are indicated outside the whiskers by black circles. AUC, area under the concentration-time curve; C<sub>max</sub>, maximum concentration; IQR, inter-quartile range.

**Opportunities & Challenges** 

- This example illustrates a common use of real world data to inform clinical pharmacology decision making.
  - NHANES is based on healthy volunteer data and may not be reflective of pediatric covariate distributions in all disease states. Assess sensitivity to this assumption.



Case Study 2:	The use of real world data to inform a real world insulin glargine trial design: a clinical trial simulation. (Barret et al. American Conference on Pharmacometrics, 2017)
Problem	<ul> <li>Explore the probability of success and dependence on design characteristics for a future real world (post- approval) study of insulin glargine (Toujeo<sup>®</sup>) in type 2 diabetes mellitus (T2DM) patients.</li> </ul>
Data Sources	<ul> <li>Electronic medical records data from 65,000 T2DM patients</li> <li>Data from 4 controlled clinical trials in T2DM</li> </ul>
Use of RWD	<ul> <li>Explore causal relationships between treatment and clinical outcomes for competing therapies</li> <li>Patient demographic/covariate distributions</li> </ul>
Results	<ul> <li>Ultimately, clinical trial simulations were implemented given models based on the controlled clinical trial data with demographics and covariates informed by the RWD.</li> </ul>
	<ul> <li>Expected power and probability of success were determined for various study sample sizes and other design elements.</li> </ul>
<b>Opportunities &amp;</b> <b>Challenges</b>	<ul> <li>The unstructured nature of RWD often leads to confounded relationships and difficulties in establishing quantitative causal relationships. Proceed with caution.</li> </ul>
	<ul> <li>Nevertheless, RWD were useful to inform other aspects of the problem such as the expected multivariate covariate distribution for a real world patient population</li> </ul>



Case Study 2:

The use of real world data to inform a real world insulin glargine trial design: a clinical trial simulation. (Barret et al. American Conference on Pharmacometrics, 2017)

 $BL \ge 9$ 

SU

**RWE Simulator** 

Data Sources Demographics Lantus / SOC Toujeo Simulation Summary -

BL ≥ 9

No SU

%

Target=8

**Population Specification** 

Summary of Specified Population

BL < 9

SU

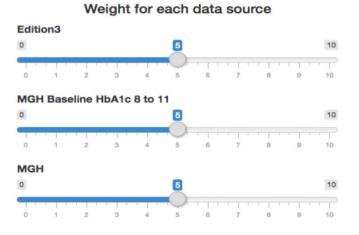
Marginal

Total

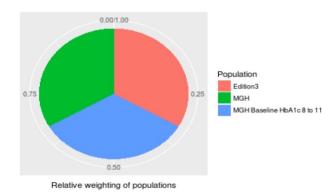
BL < 9

No SU

Advanced



Summary of relative weights



Target=7	20.7	13.8	16.8	11.2	62.5	
Target=8	10.1	7.8	11.8	7.9	37.5	
Marg. Tot.	30.8	21.6	28.6	19.1	100.0	
Target=7	BL ≥ No S		BL ≥ 9 SU	BL		BL < 9 SU

Slide courtesy of Jeffrey Barrett, ACoP 2017



Case Study 2:

**RWE Simulator** 

The use of real world data to inform a real world insulin glargine trial design: a clinical trial simulation. (Barret et al. American Conference on Pharmacometrics, 2017)

Simulation Summary -

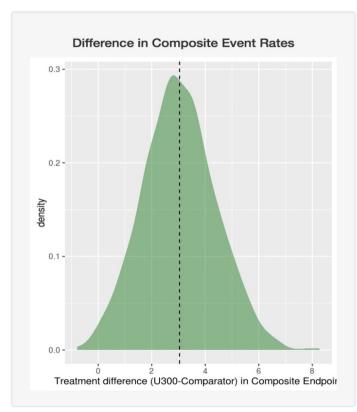
Advanced

**Probability of Success** Dashed line represents (Bayesian prior) mean powe Solid line is fixed at 90% 0.010 density 0.005 -0.000 -25 50 75 100 Power

Data Sources

Demographics

Lantus / SOC



Toujeo

Current Scenario Statistics						
	Estimate (%)					
Toujeo Composite Endpoint Rate	18.68					
Lantus / SOC Composite Endpoint Rate	15.64					
Expected Treatment Difference (U300-Comparator)	3.04					
Average (Bayesian Predictive) Power	59.10					
MGH 8-11 with E3 Effect						
Save Scenario						

Saved scenarios can be reviewed by toggling to "Multi-scenario Summary" on the Navigation Bar



Case Study 3:	Use of Real-World Data and Pharmacometric Modeling in Support of Lacosamide Dosing in Pediatric Patients Under 4 Years of Age ( <i>Lukka et al, 2021, Journal of Clinical Pharmacology</i> )
Background	<ul> <li>Lacosomide (Vimpat) approved for Refractory Focal Seizures (RFS) for children and adults ≥4 years of age BUT not approved for pediatrics &lt;4 years.</li> <li>The <u>Prediatric Epilepsy Academic Consortium for Extrapolation</u> (PEACE) recommends that antiepileptic drugs</li> </ul>
	<ul> <li>approved in adults for RFS are considered effective for children ages ≥2 years . This position is supported by FDA CDER.</li> <li>Lacosomide is used <u>off-label</u> for treatment of RFS in pediatric patients &lt;4 years.</li> </ul>
Problem	<ul> <li>No confirmed guideline on appropriate dosing of adjuctive lacosomide for patients &lt;4 years.</li> <li>Few trials in ages &lt;4yrs</li> </ul>
Analysis Goals	STAGE 1: Use RWD to characterize PK of Lacosomide in ages 1 month to <18 years using pharmacometrics analysis. STAGE 2: Use resulting PK models to derive age-appropriate dosing recommendations using simulation-based exposure-matching

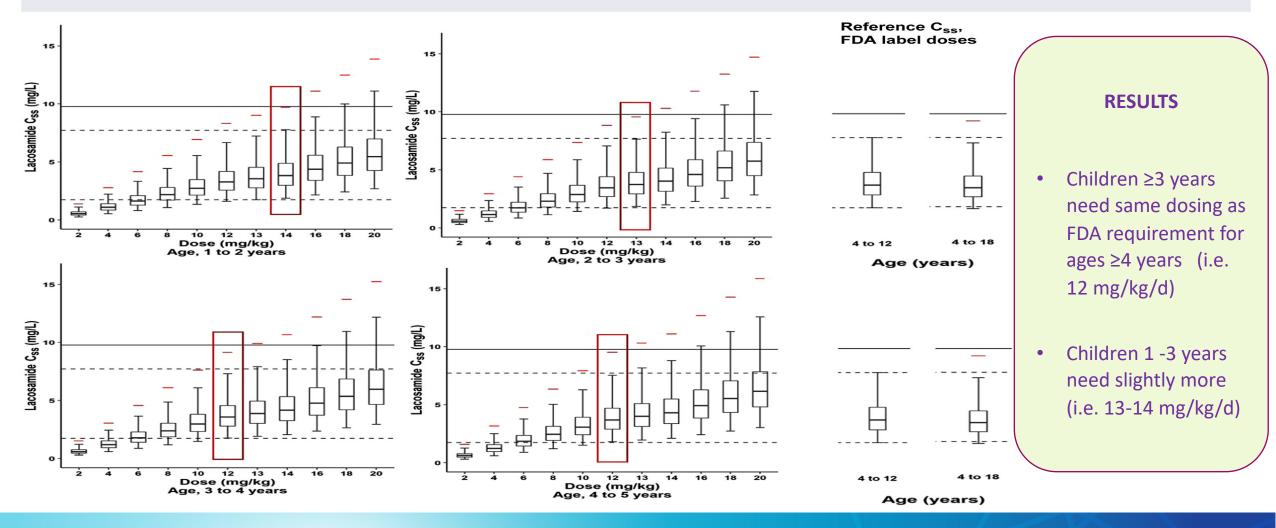


Case Study 3 cont'd:	Use of Real-World Data and Pharmacometric Modeling in Support of Lacosamide Dosing in Pediatric Patients Under 4 Years of Age ( <i>Lukka et al, 2021, Journal of Clinical Pharmacology</i> )					
Analysis Stage 1	<ul> <li>RWD data source: EMR - routinely captured therapeutic drug monitoring assessments.</li> <li>Identified 315 pediatric patients &gt;1 month to &lt;18 years who received Lacosomide.</li> <li>Conduct pop-PK modeling using mixed-effects structural models <ul> <li>Outcome = PK Clearance</li> <li>Linear predictor: Trt dose; Age; Sex; Race; Other concomitant epileptic drugs (Phenobarbital/Felbamate)</li> </ul> </li> </ul>					
Analysis Stage 2	<ul> <li>Use resulting PK model</li> <li>Simulate virtual pediatric patients to explore age-associated dose requirements</li> <li>Age groups:         <ul> <li>A: 1 month - &lt;1 year</li> <li>B: 1 year - &lt;3 years</li> <li>Compared to established FDA- approved pediatric dosing groups</li> <li>D: 4 years - 12 years</li> <li>E: 4 years - 18 years</li> </ul> </li> </ul>					



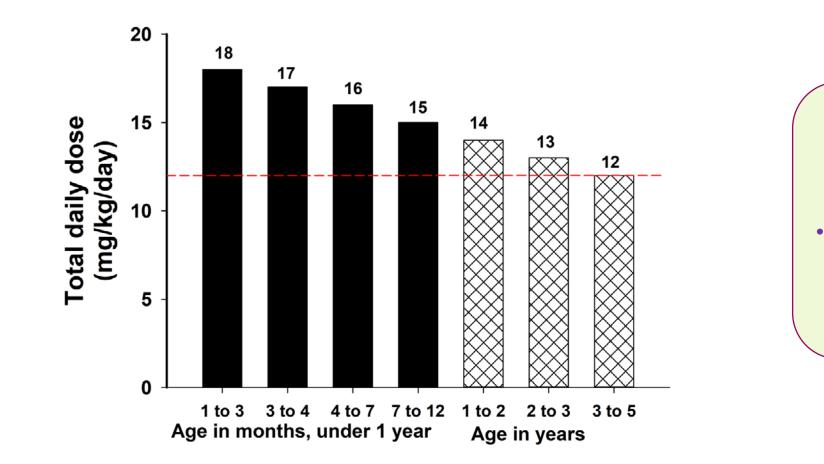
Case Study 3 cont'd:

Use of Real-World Data and Pharmacometric Modeling in Support of Lacosamide Dosing in Pediatric Patients Under 4 Years of Age (*Lukka et al, 2021, Journal of Clinical Pharmacology*)





Case Study 3Use of Real-World Data and Pharmacometric Modeling in Support of Lacosamide Dosing in Pediatric<br/>cont'd:cont'd:Patients Under 4 Years of Age (Lukka et al, 2021, Journal of Clinical Pharmacology)





**RESULTS** 

Children 1 month – 1

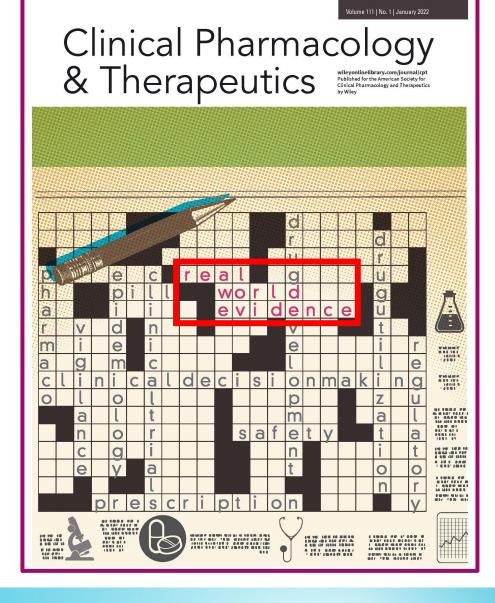
(i.e. 15-18 mg/kg/d)

year need slightly more

# **Back up Slides**



# January 2022 issue of CPT

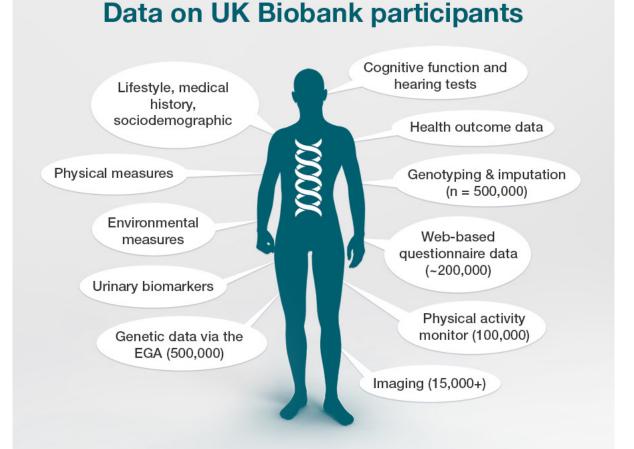


# Potential uses of RWD/RWE in clinical pharmacology

- 1. Identifying new genetic targets and biomarkers
- 2. Understanding natural history to enrich clinical trial population
- 3. Informing sample size calculations for clinical trials
- 4. Assessing real-world prescribing patterns and dosing
- 5. Identifying new DDIs that increase risk of AEs
- 6. Identifying new DDIs related to QT prolongation
- 7. Assessing clinical impact of DDIs from pharmacology studies



# Identifying new genetic targets and biomarkers



## Hypertrophic cardiomyopathy (HCM)

Chromo

some

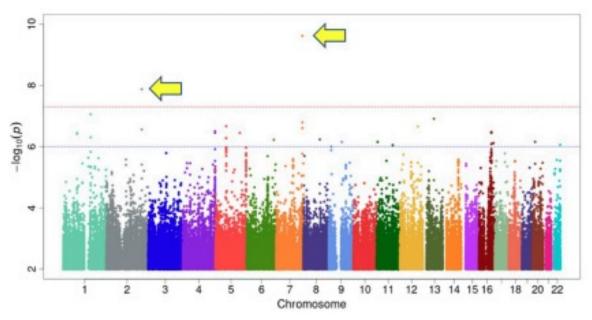
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rs Number

rs78630626

PARD3B rs188937806

- Disorder of heart muscles associated with variants in 8 genes
- Compared genomes of 363 individuals with HCM to 7,260 controls matched for age, sex, and ancestry
- Examined comorbidities based on ICD diagnosis codes



Position

152,056,039

205,754,718

Variant Type

Intronic

Intronic

OR

3.8

3.8

P-value

2.4 x 10<sup>-10</sup>

1.3 x 10<sup>-8</sup>

- Identified 2 novel genetic variants associated with HCM
- Found new biometrics and biomarkers associated with HCM

#### OCT 2022 References 16-19 Control Cont

Gyftopoulos A, et al. Identification of Novel Genetic Variants and Comorbidities Associated With ICD-10-Based Diagnosis of Hypertrophic Cardiomyopathy Using the UK Biobank Cohort. Front Genet. 2022;13:866042.

Gene

KMT2C

Slide 26

Minor Allele

Frequency

1.6%

1.0%

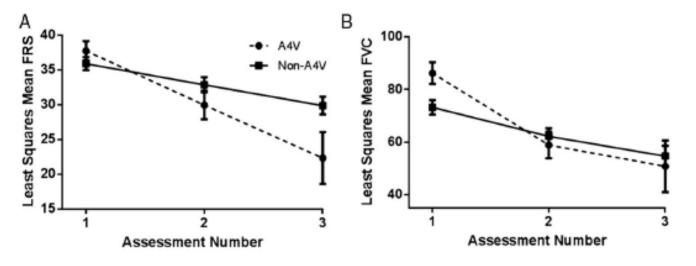
# Understanding natural history to enrich clinical trial population

## Background

- Amyotrophic lateral sclerosis (ALS) is a fatal and progressive neurological disease with few therapies
- A subgroup of patients with familial ALS have mutations in the SOD1 gene
- Therapies aimed at SOD1 need to understand natural history of disease progression

## Methods

- Consortium conducted retrospective chart review to identify 175 patients with ALS and SOD1 mutations
- Results were pooled to analyze changes in ALS-Functional Rating Scale (FRS) and forced vital capacity (FVC) over time
- Compared 2 subgroups of SOD1 mutations (A4V vs non-A4V)



- Outcomes within A4V subgroup were homogeneous
- Focusing on A4V subgroup could reduce sample size required by ~40%

Group	Sample size
SOD1 overall	N = 88
SOD1 A4V	N = 52

## RWI

Significant differences were found in disease progression between A4V and non-A4V SOD1 mutations



#### References

Bali T, Self W, Liu J, Siddique T, Wang LH, Bird TD, et al. Defining SOD1 ALS natural history to guide therapeutic clinical trial design. J Neurol Neurosurg Psychiatry. 2017;88(2):99-105.

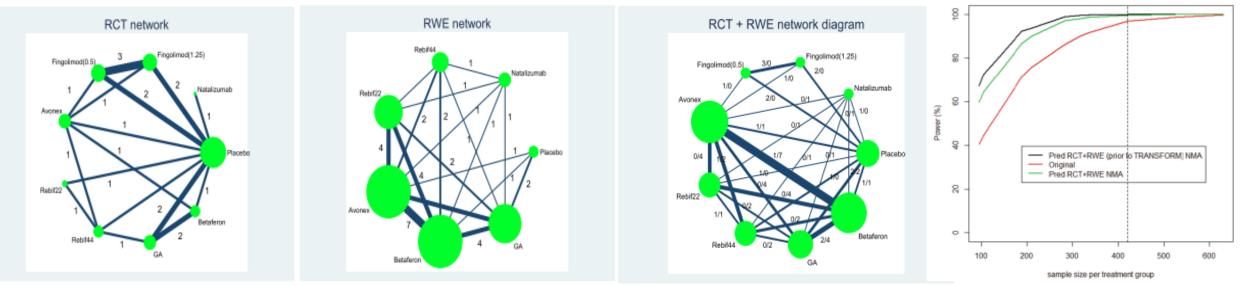
# Informing sample size calculations for clinical trials

### Background

- Biopharma companies generally use best available information to inform sample size calculations for phase 3 RCTs
- Network meta-analysis (NMA) synthesizes published literature on effect sizes for available therapies
- Incorporating RWE into NMA could increase available comparisons and improve information for sample size calculations

## Methods

- Used NMA to estimate effect size for annualized relapse rate (ARR) with therapies studied for multiple sclerosis
- Simulated phase 3 RCT using effect sizes from NMA with vs without RWE
- Compared sample size required to achieve 90% power in future phase 3 RCT with vs without RWE



## Findings

• Sample size calculation based on NMA with RWE predicted that required sample size could be reduced by ~32%



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Martina R, Jenkins D, Bujkiewicz S, Dequen P, Abrams K, GetReal W. The inclusion of real world evidence in clinical development planning. Trials. 2018;19(1):468.

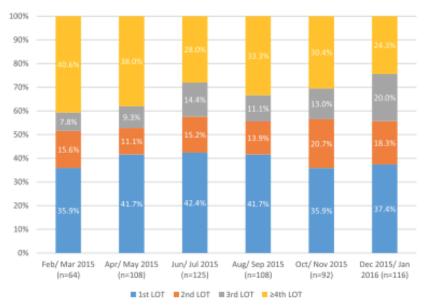
# Assessing real-world prescribing patterns and dosing

## Background

- Palbociclib is CDK 4/6 inhibitor approved by FDA in 2015 for HR+/HER2- breast cancer in women
- RCTs evaluated Palbociclib 125mg + letrozole or fulvestant daily for 21 days

## Methods

- Analyzed EHR data from US community oncology practices in the 12 months after approval
- Identified women with breast cancer and claim for Palbociclib + letrozole
- Assessed lines of therapy prior to Palbociclib use, starting dose, and dose changes based on treatment cycles



	Overa		Numb	er of palboo	iclib cycle:	s received <sup>a</sup>		
			6 cycles <sup>b</sup>		4 cycles <sup>c</sup>		2 cycles <sup>d</sup>	
Total patients (n (%)	612	(100)	336	(54.9)	445	(72.7)	524	(85.6)
Starting dose (n (% of patients with known starting dose))								
125 mg	367	(88.0)	237	(88.1)	283	(87.6)	321	(87.5)
100 mg	46	(11.0)	30	(11.2)	38	(11.8)	42	(11.4)
75 mg	4	(1.0)	2	(0.7)	2	(0.6)	4	(1.1)
Type of first dose reduction (n (% of patients with known dose))								
Reduction from 125 mg to 100 mg	65	(15.6)	65	(24.2)	64	(19.8)	45	(12.3)
Reduction from 100 mg to 75 mg	6	(1.4)	6	(2.2)	6	(1.9)	5	(1.4)
Reduction from 125 mg to 75 mg	13	(3.1)	13	(4.8)	13	(4.0)	8	(2.2)
Days to first dose reduction (mean, SD)	48	(31)	48	(31)	48	(31)	46	(31)

## Findings

- Identified 417 patients who met eligibility criteria and had known starting dose; 64.6% received 6 cycles
- 88.0% started on 125mg dose; 20.1% had dose reduction, most commonly from 125mg to 100mg



#### References

Kish JK, et al. Real-world evidence analysis of palbociclib prescribing patterns for patients with advanced/metastatic breast cancer treated in community oncology practice in the USA one year post approval. Breast Cancer Res. 2018;20(1):37.

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# Identifying new DDIs that increase risk of AEs

## Background

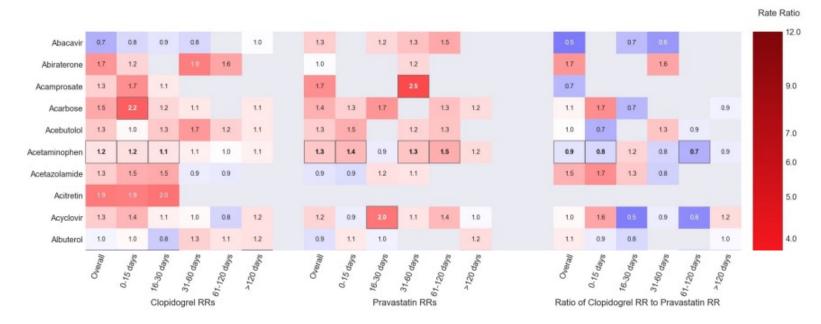
- Clopidogrel is associated with increased risk of serious bleeding (eg, gastrointestinal bleeding, intracranial hemorrhage)
- Limited research on whether DDIs may potentiate risk of serious bleeding with clopidogrel

## Methods

- Analyzed Optum claims database to identify concomitant medications for patients taking clopidogrel
- Used self-control design to compare risk of serious bleeding for clopidogrel + other vs. pravastatin + other

### RWI

• Compared risk of serious bleeding for 431 pairs of medications common to clopidogrel and pravastatin



- Identified 28 pairs with SS increased risk
- 13 pairs were expected
- 15 pairs were new signals of DDIs



#### References

Leonard CE, et al. Clopidogrel Drug Interactions and Serious Bleeding: Generating Real-World Evidence via Automated High-Throughput Pharmacoepidemiologic Screening. Clin Pharmacol Ther. 2019;106(5):1067-75.



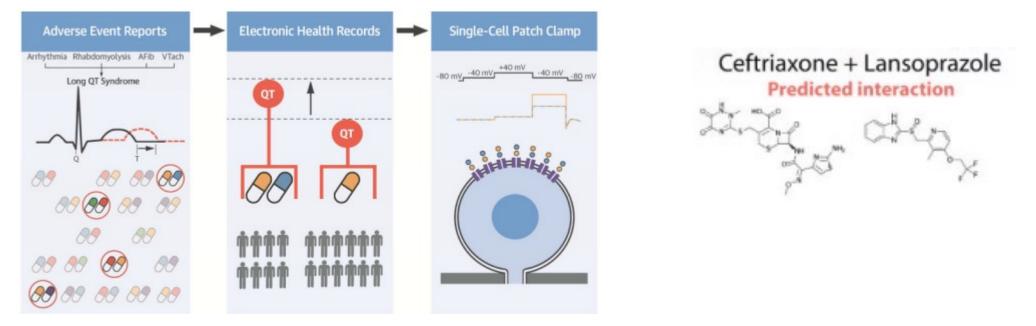
# Identifying new DDIs related to QT prolongation

## Background

- QT prolongation can result in ventricular tachycardia and sudden death
- Over 40 medications are associated with prolonged QT interval; DDIs may also result in prolonged QT interval

## Methods

- Analyzed FDA adverse event reporting system (FAERS) and EHR data from Columbia University Medical Center
- Examined ECGs for patients taking suspected drug pairs where DDIs could prolong QT interval
- Conducted single-cell patch clamp tests to evaluate top drug pairs where DDIs could prolong QT interval



### RWI

- Identified 889 signals in FAERS, 34 corroborated by EHR, and 8 new drug pairs associated with prolonged QT interval
- Confirmed that ceftriaxone + lansoprazole block hERG channel in single cell study



#### References

Lorberbaum T, Sampson KJ, Chang JB, Iyer V, Woosley RL, Kass RS, et al. Coupling Data Mining and Laboratory Experiments to Discover Drug Interactions Causing QT Prolongation. J Am Coll Cardiol. 2016;68(16):1756-64.

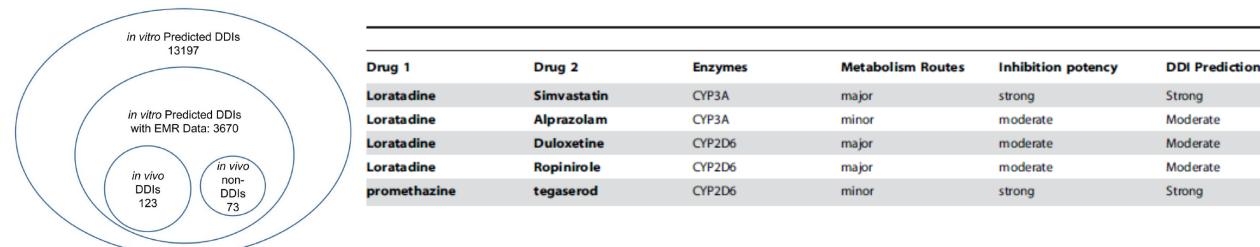
# Assessing clinical impact of DDIs from pharmacology studies

## Background

- Findings from in vitro studies on potential DDIs can be evaluated further with in vivo and in populo studies
- Study focused on potential DDIs that increase the risk of myopathy

## Methods

- Identified potential drug-drug pairs that could result in DDIs based on CYP substrates or inhibitors
- Searched literature for *in vivo* studies related to potential drug-drug pairs of interest
- Analyzed EHR data to examine medications used by individuals with myopathy
- Compared risk of myopathy for drug-drug pairs vs. individual drugs



## Findings

- 13,197 drug pairs had potential DDIs; 3,670 (27.8%) were co-prescribed; 196 (1.5%) had in vivo studies related to DDIs
- Identified 59,572 patients with myopathy, including 53 with rhabdomyolysis
- Identified 5 new drug-drug pairs potentially associated with an increased risk of myopathy when co-prescribed



#### References

Duke JD, et al. Literature based drug interaction prediction with clinical assessment using electronic medical records: novel myopathy associated drug interactions. PLoS Comput Biol. 2012;8(8):e1002614.

# Limitations of RWD/RWE

- 1. High costs of data and resources to analyze data
- 2. Single datasets have limited available information
- 3. Limited follow-up available in single datasets
- 4. Challenging to link multiple datasets
- 5. Data are messier than expected
- 6. Large sample sizes can be deceiving
- 7. Best practices are still being developed
- 8. Limited expertise in RWD and RWE methods
- 9. External stakeholders concerned about "P hacking"
- 10. Unknown disposition of regulators for novel studies













# **Discussion**

