



**Real-world evidence: Trends and application of real-world data in
drug development and safety**

The Sentinel Experience

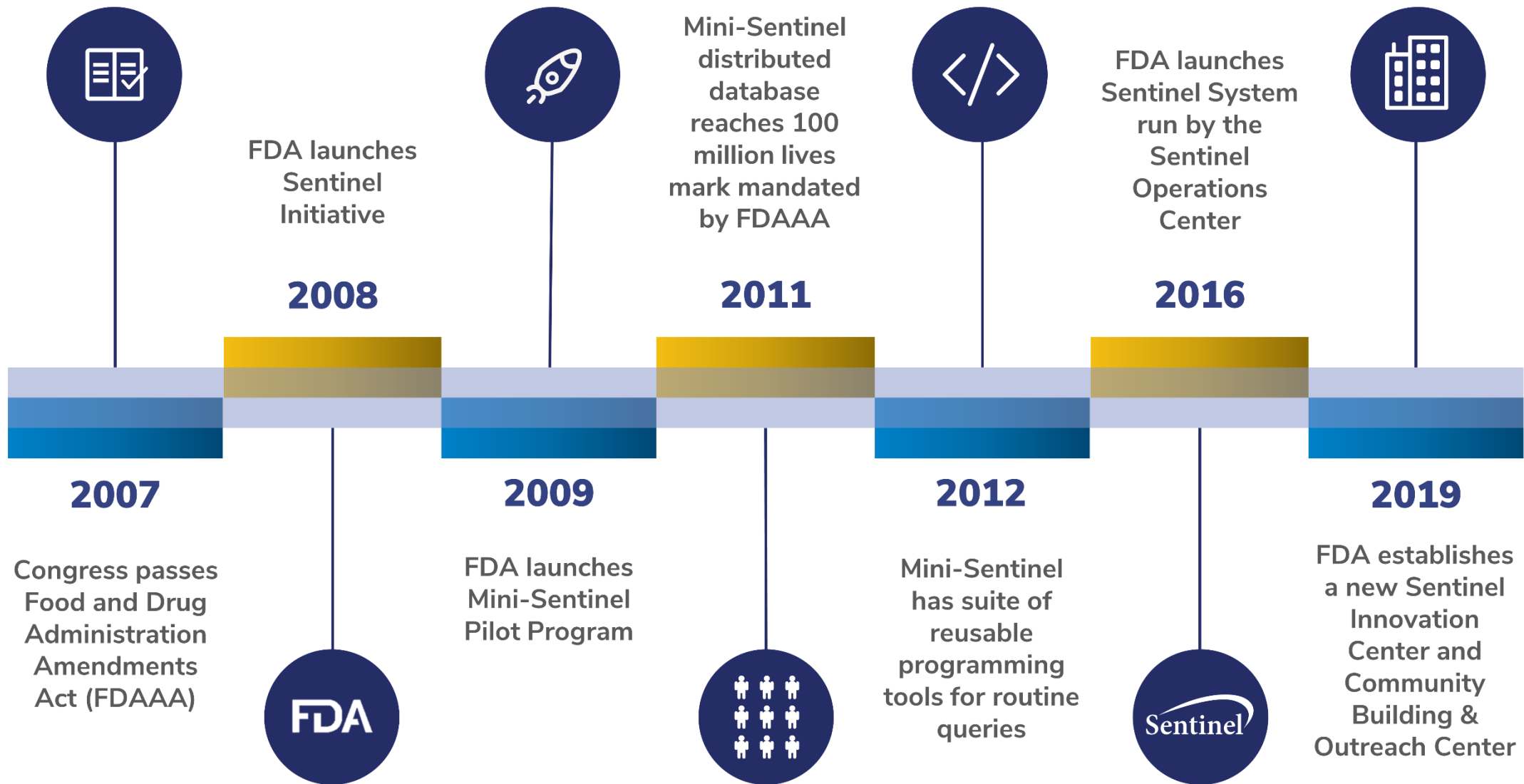
Darren Toh, ScD

Endowed Professor

Department of Population Medicine

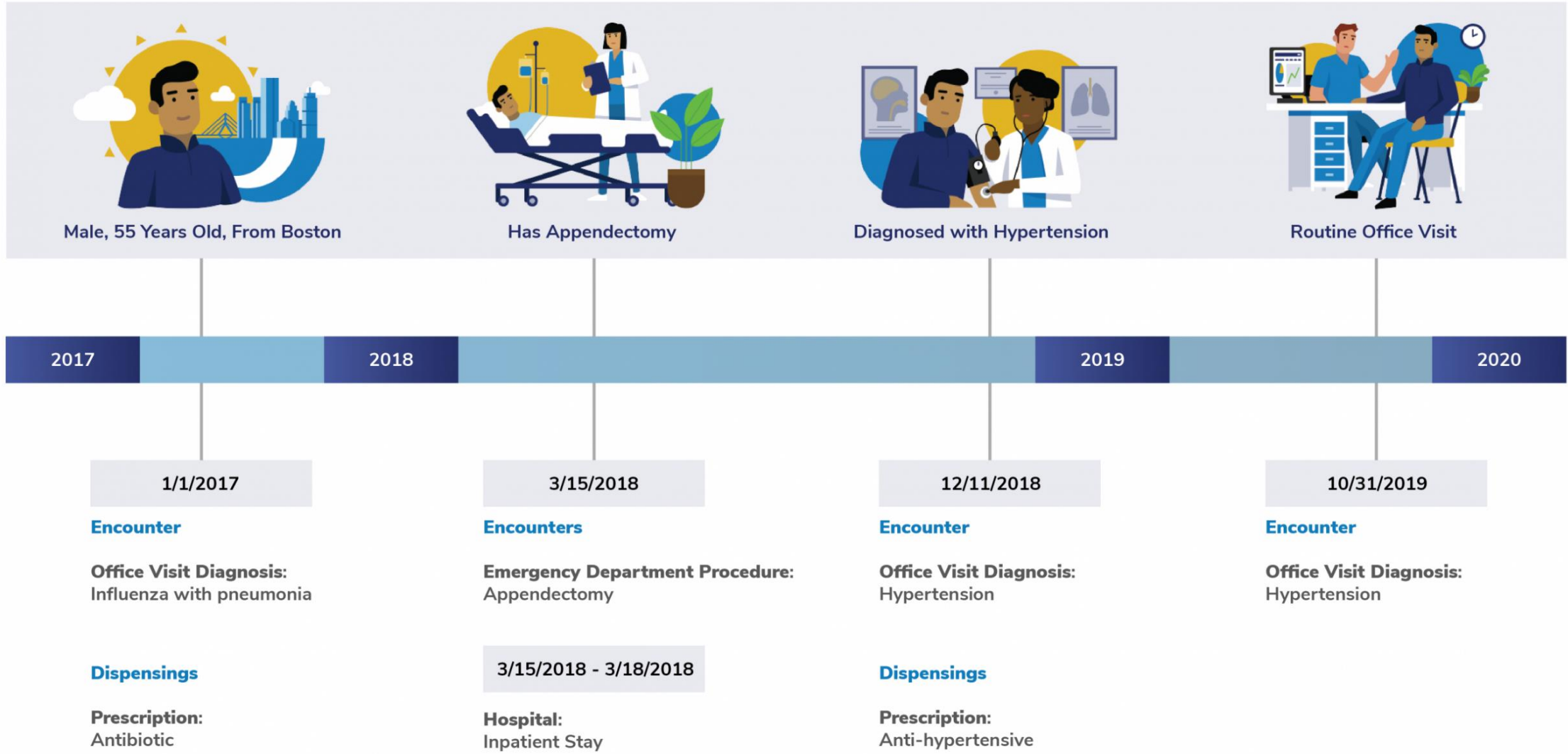
Harvard Medical School and Harvard Pilgrim Health Care Institute

July 10, 2021



DEPARTMENT OF POPULATION MEDICINE





DEMOGRAPHIC

PATID	BIRTH_DATE	SEX	HISPANIC	RACE	zip
PatID1	2/2/1964	F	N	5	32818

DISPENSING

PATID	RXDATE	NDC	RXSUP	RXAMT
PatID1	10/14/2005	00006074031	30	30
PatID1	10/14/2005	00185094098	30	30
PatID1	10/17/2005	00378015210	30	45
PatID1	10/17/2005	54092039101	30	30
PatID1	10/21/2005	00173073001	30	30
PatID1	10/21/2005	49884074311	30	30
PatID1	10/21/2005	58177026408	30	60
PatID1	10/22/2005	00093720656	30	30
PatID1	10/23/2005	00310027510	30	15

ENROLLMENT

PATID	ENR_START	ENR_END	MEDCOV	DRUGCOV
PatID1	7/1/2004	12/31/2004	Y	N
PatID1	1/1/2005	12/31/2005	Y	Y

DEATH

PATID	DEATHDT	DTIMPUTE	SOURCE	CONFIDENCE
PatID1	12/27/2005	N	S	E

ENCOUNTER

PATID	ENCOUNTERID	ADATE	DDATE	ENCTYPE
PatID1	EncID1	10/18/2005	10/20/2005	IP

DIAGNOSIS

PATID	ENCOUNTERID	ADATE	PROVIDER	ENCTYPE	DX	DX_CODETYPE	PDX
PatID1	EncID1	10/18/2005	Provider1	IP	296.2		9 P
PatID1	EncID1	10/18/2005	Provider1	IP	300.02		9 S
PatID1	EncID1	10/18/2005	Provider1	IP	305.6		9 S
PatID1	EncID1	10/18/2005	Provider1	IP	311		9 P
PatID1	EncID1	10/18/2005	Provider1	IP	401.9		9 S
PatID1	EncID1	10/18/2005	Provider1	IP	493.9		9 S
PatID1	EncID1	10/18/2005	Provider1	IP	715.9		9 S

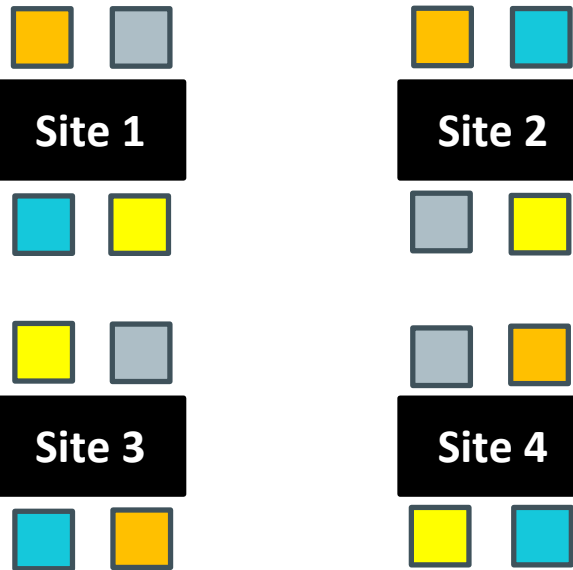
PROCEDURE

PATID	ENCOUNTERID	ADATE	PROVIDER	ENCTYPE	PX	PX_CODETYPE
PatID1	EncID1	10/18/2005	Provider1	IP	84443	C4
PatID1	EncID1	10/18/2005	Provider1	IP	99222	C4
PatID1	EncID1	10/18/2005	Provider1	IP	99238	C4
PatID1	EncID1	10/18/2005	Provider2	IP	27445	C4

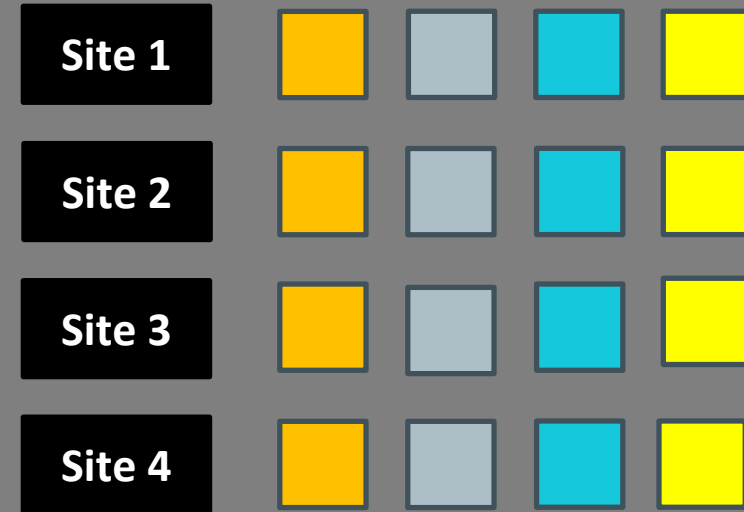
CAUSE OF DEATH

PATID	COD	CODETYPE	CAUSETYPE	SOURCE	CONFIDENCE
PatID1	J18.0	10	U	S	E

Individual data partners



Data standardization



Types of Data Quality Checks and Examples

Level 1 Checks: Single table checks

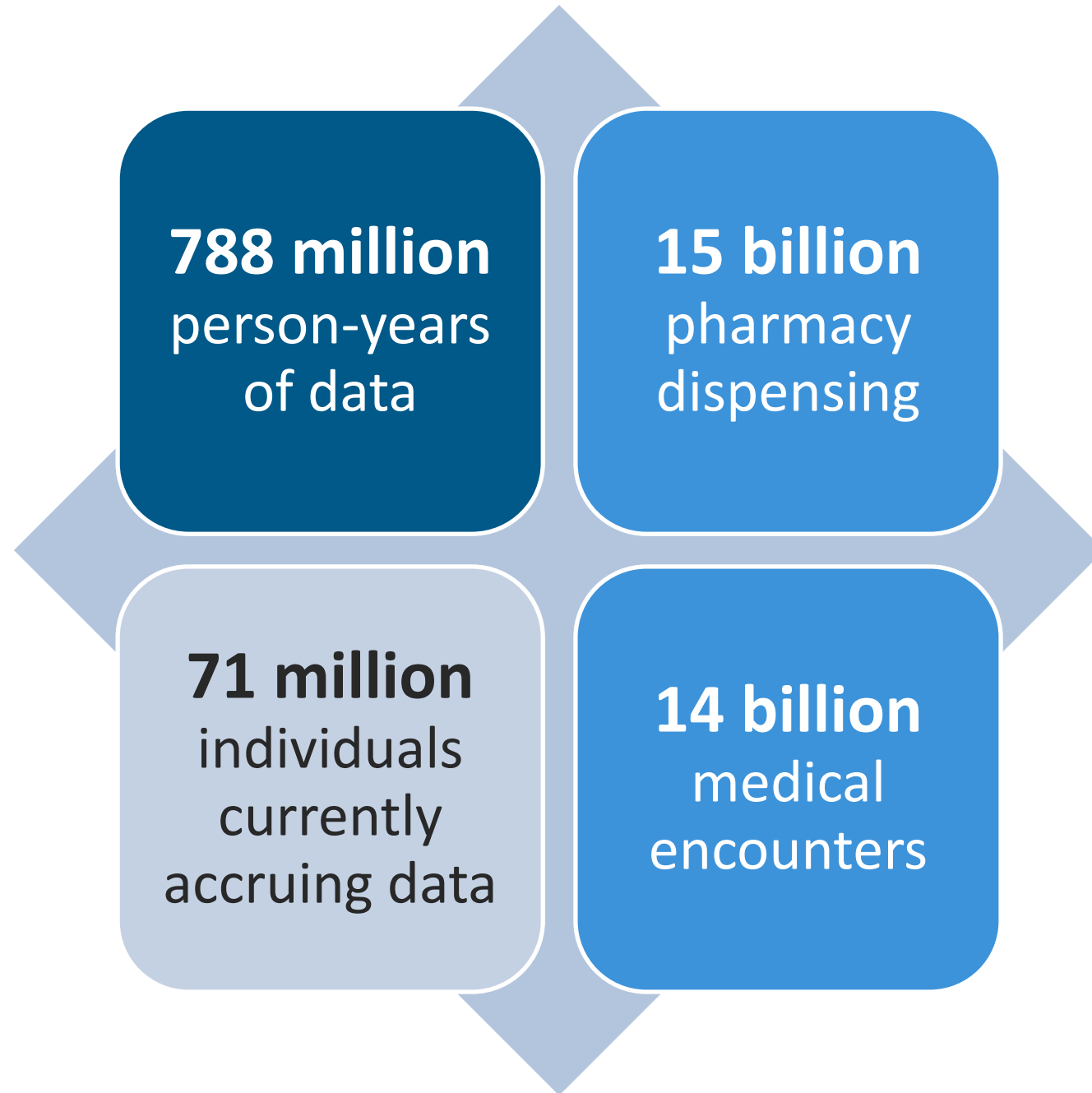
- ✓ **Completeness**
Admission date is not missing value
- ✓ **Validity**
Admission date is in date format

Level 2 Checks: Cross-table checks

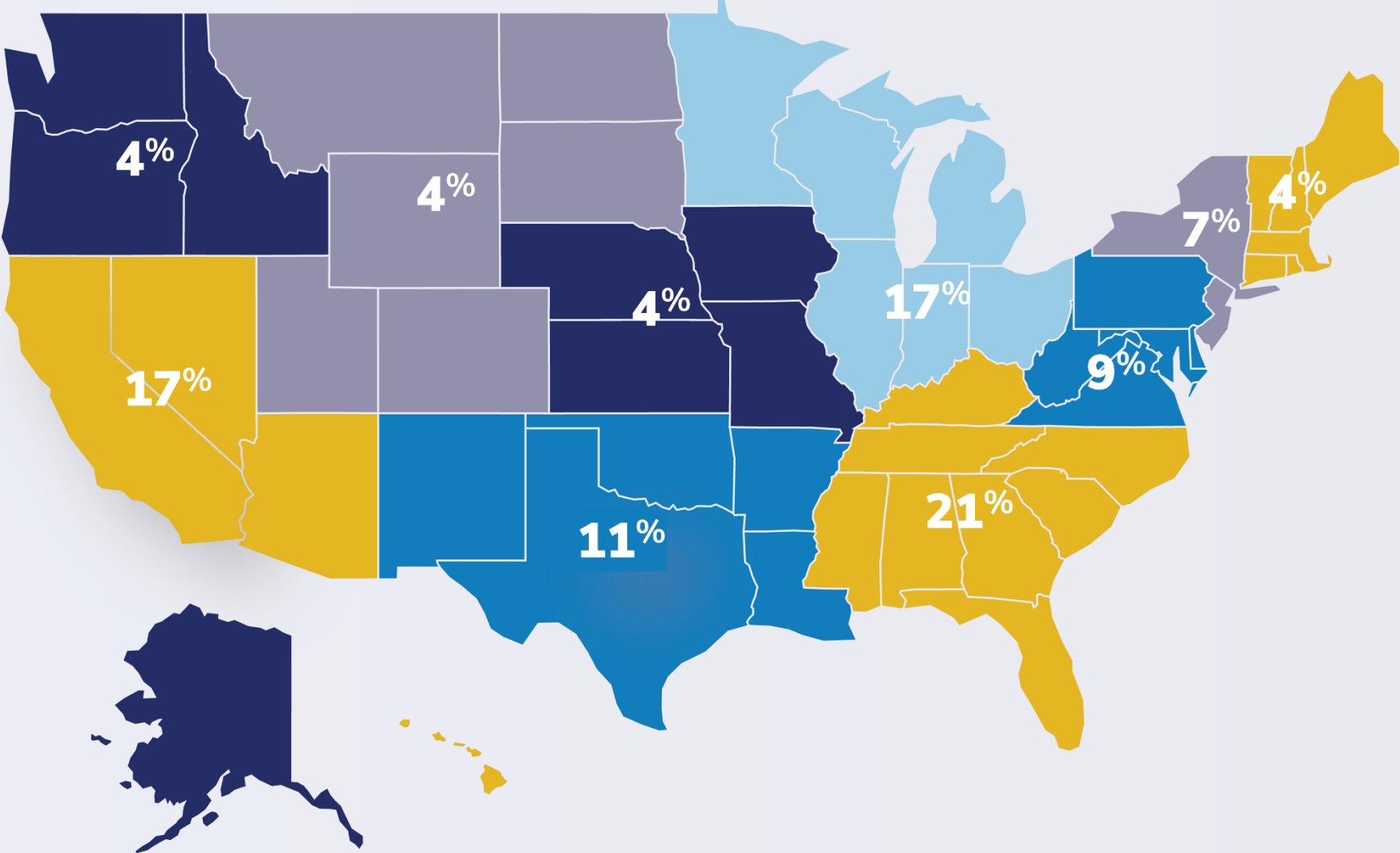
- ✓ **Accuracy**
Admission date occurs before the patient's discharge
- ✓ **Integrity**
Admission date occurs within the patient's active enrollment period

Level 3 Checks: Cross-time checks




- ✓ **Consistency of Trends**
There is no sizable percent change in admission date record counts by month-year

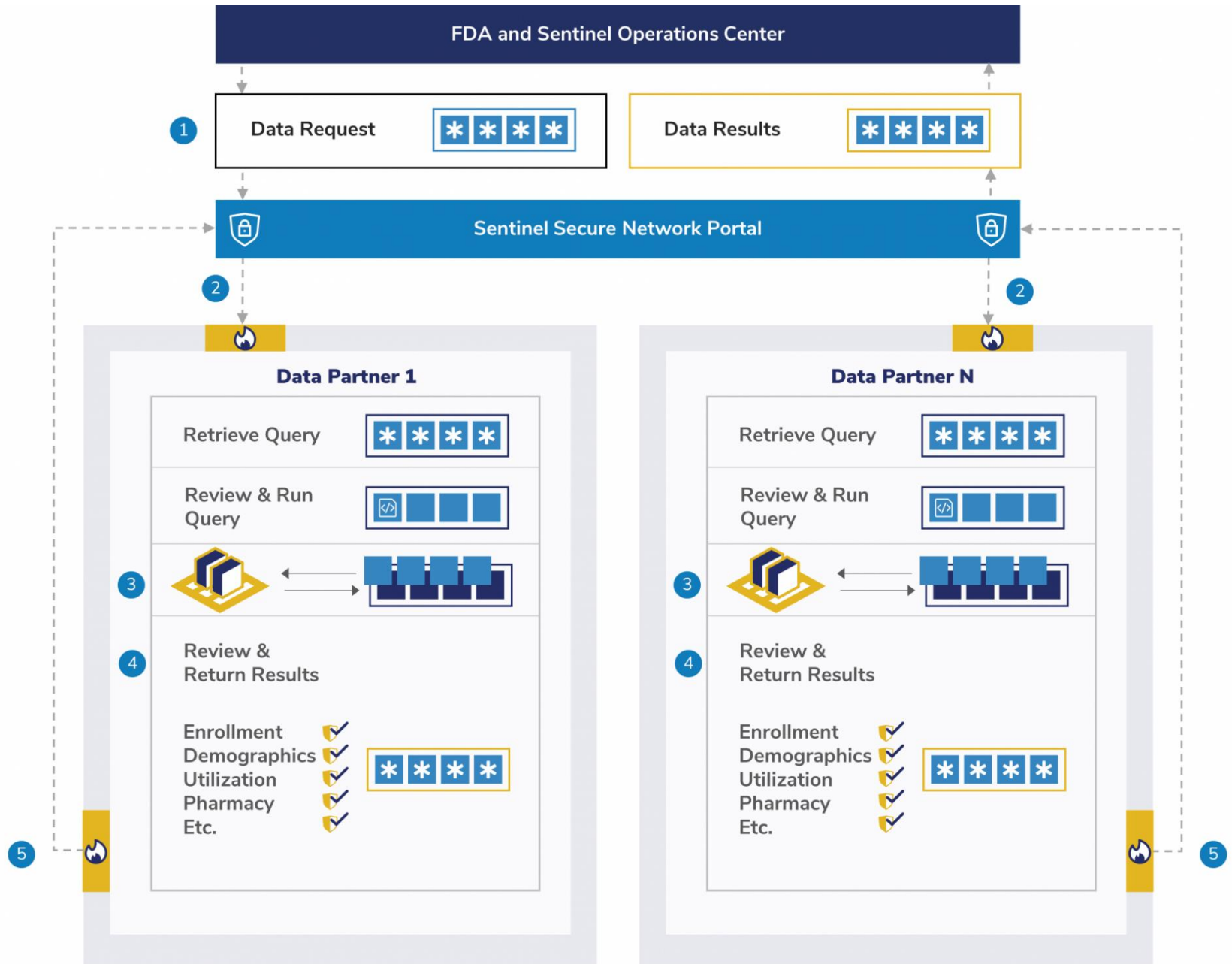


Member Distribution of the Sentinel Distributed Database by Geographic Region



- 1 FDA data request sent to Data Partners via FISMA-compliant secure network portal
- 2 Data Partners retrieve query
- 3 Data Partners review and run query against their local data behind their firewalls
- 4 Data Partners review results for accuracy and privacy compliance
- 5 Data Partners return de-identified results to SOC via secure portal

-  Firewall
-  Local Data
-  Privacy Compliance



Sentinel's Multi-Modal Response System

Claims (with Limited EHR Network)

Active Risk Identification and Analysis (ARIA)*

Sentinel Distributed Database

IBM® MarketScan® Research Databases

- Sentinel Common Data Model
- Sentinel Analytic Tools
- Access to Medical Records within the Sentinel Distributed Database

EHR Data Aggregators

TriNetX

IBM Watson Health

- Proprietary Common Data Models
- Web-Based Query Interface & Custom Programming
- Access to Medical Records varies by Source

EHR Data Warehouse

HCA Healthcare

Veradigm

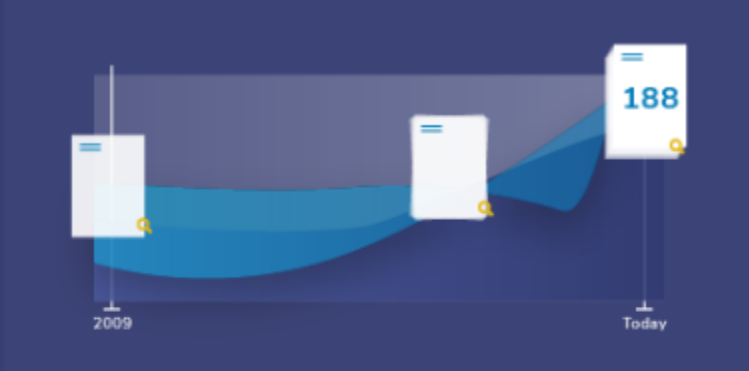
- Data Warehouse for Multiple Healthcare Organizations in a System
- Custom Programming
- Access to Medical Records

EHR Networks

PCORnet

- PCORnet Common Data Model
- PCORnet Analytic Tools
- Access to Medical Records

**Note: The Active Risk Identification and Analysis (ARIA) System is comprised of the Sentinel Distributed Database, the Sentinel Common Data Model, and Sentinel analytic tools.*



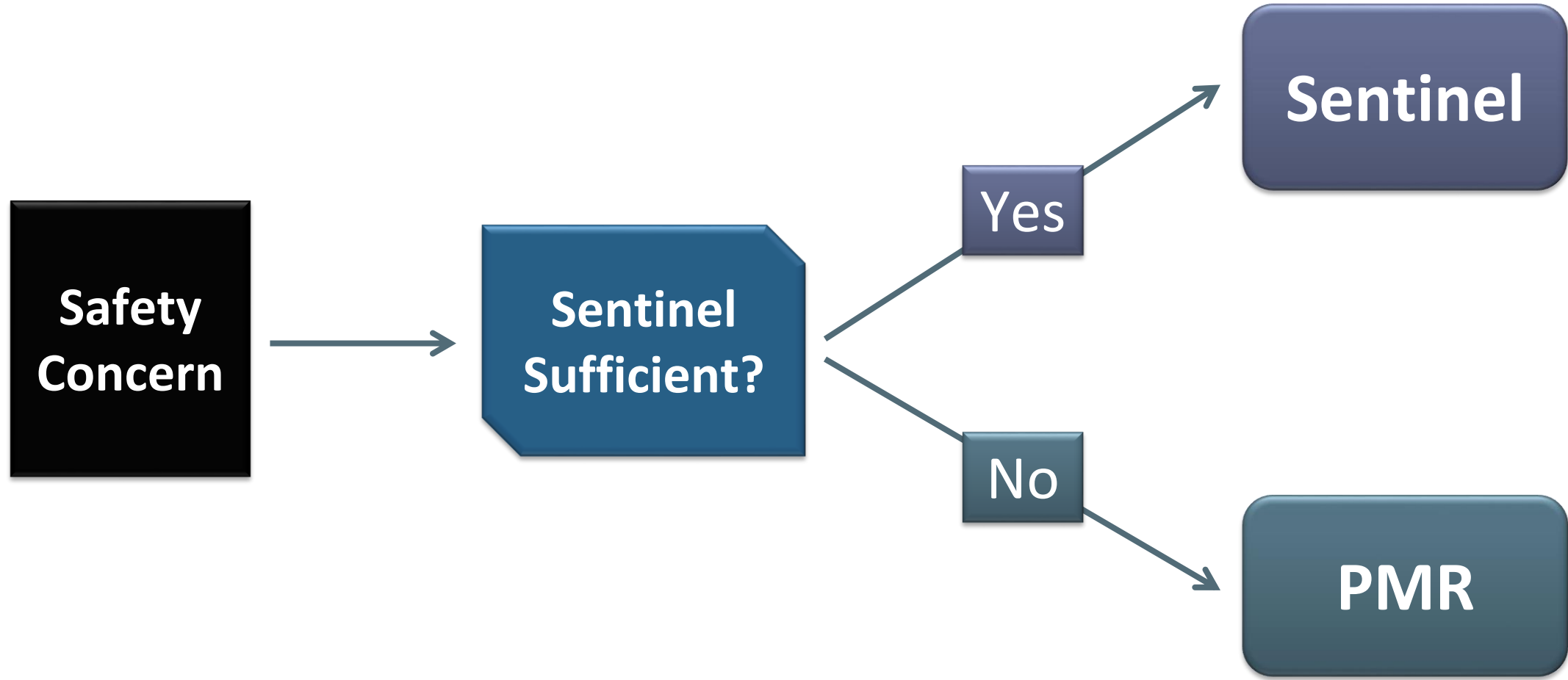
Since the founding of the Sentinel Initiative in 2009, 188 scientific papers have been published

Scientific Publications [>](#)

Since 2016, more than 30 Sentinel drug assessments have contributed to FDA regulatory actions or discussion

Drug Assessments [>](#)





PMR: Post-market requirement



NDA 211801

NDA APPROVAL

Ardelyx, Inc.
Attention: Robert C. Blanks, M.S., RAC
Senior Vice President, Regulatory Affairs and Quality Assurance
34175 Ardenwood Blvd.
Suite 100
Fremont, CA 94555

NDA approval letter

SENTINEL/ARIA NOTIFICATION





The Food and Drug Administration Amendments Act of 2007 (FDAAA) required FDA to establish a national electronic system to monitor the safety of FDA-regulated medical products. In fulfillment of this mandate, FDA established the Sentinel System, which enables FDA to proactively monitor drug safety using electronic health data from multiple data sources that contribute to the Sentinel Distributed Database.

FDA plans to evaluate tenapanor in the Sentinel System as part of the implementation of section 505(o) of the FDCA. We have determined that the new pharmacovigilance system, Sentinel's Active Risk Identification and Analysis (ARIA) System, established under section 505(k)(3) of the FDCA, is sufficient to assess the following serious risks: risk of inflammatory bowel disease.

The ARIA safety assessment will be posted to the Sentinel website.³ Once there is sufficient product uptake to support an analysis, an analysis plan will be posted online. After the analysis is complete, FDA will also post the results on the Sentinel website. FDA will notify you prior to posting the analysis plan and prior to posting the results.



Risk of Nonmelanoma Skin Cancer in Association With Use of Hydrochlorothiazide-Containing Products in the United States

Efe Eworuke , PhD,^{1,*} Nicole Haug, MPH,² Marie Bradley , PhD,¹ Austin Cosgrove, BS,² Tancy Zhang, MPH,² Elizabeth C. Dee, MPH,² Sruthi Adimadhyam , PhD,² Andrew Petrone, MPH,² Hana Lee, PhD,³ Tiffany Woodworth , MPH,² Sengwee Toh, ScD²

Postmarketing Experience:

Non-melanoma Skin Cancer

Hydrochlorothiazide is associated with an increased risk of non-melanoma skin cancer. In a study conducted in the **Sentinel System**, increased risk was predominantly for squamous cell carcinoma (SCC) and in white patients taking large cumulative doses. The increased risk for SCC in the overall population was approximately 1 additional case per 16,000 patients per year, and for white patients taking a cumulative dose of $\geq 50,000$ mg the risk increase was approximately 1 additional SCC case for every 6,700 patients per year.

Label change

FDA Briefing Document

ARTHRITIS ADVISORY COMMITTEE AND DRUG SAFETY AND RISK MANAGEMENT ADVISORY COMMITTEE MEETING

January 11, 2019

NDA 21856

Febuxostat

Xanthine oxidase (XO) inhibitor for the chronic
management of hyperuricemia in patients with gout

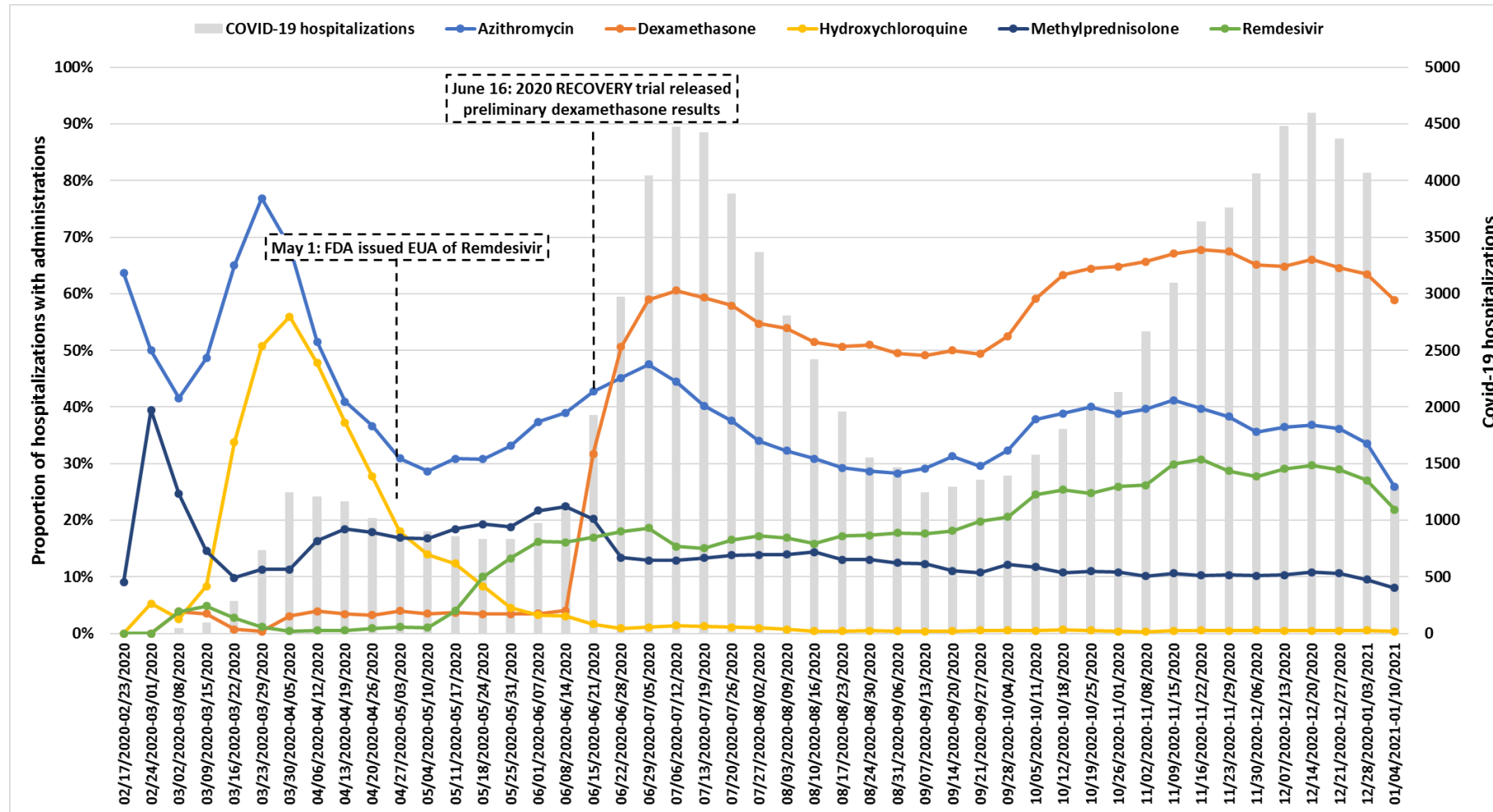
Takeda

EXECUTIVE SUMMARY

Febuxostat (Uloric®), a selective inhibitor of xanthine oxidase, lowers serum uric acid levels by inhibiting the conversion of xanthine to uric acid. It was approved by the FDA in February 2009 for the management of chronic hyperuricemia in patients with gout. Preliminary results from a post-approval safety trial (Cardiovascular Safety of Febuxostat and Allopurinol in Patients with Gout and Cardiovascular Morbidity (CARES)) showed an increased risk of cardiovascular-related death and all-cause death in febuxostat users. As a result, FDA issued a drug safety communication in November 2017. An advisory committee (AC) meeting is scheduled for January 11, 2019 to discuss potential regulatory action to address the safety of febuxostat. For context, the Division of Pulmonary, Allergy, and Rheumatology Products (DPAAP) requested the Division of Epidemiology (DEPI) to investigate the characteristics of the gout population and use of febuxostat and allopurinol in real-world settings using the Sentinel Distributed Database (SDD) since the CARES trial was enriched for patients with CVD.

**Advisory Committee
briefing document**

A COVID-19-ready public health surveillance system: The Food and Drug Administration's Sentinel System





The NEW ENGLAND
JOURNAL of MEDICINE

Perspective

Developing the Sentinel System — A National Resource for Evidence Development

Rachel E. Behrman, M.D., M.P.H., Joshua S. Benner, Pharm.D., Sc.D., Jeffrey S. Brown, Ph.D., Mark McClellan, M.D., Ph.D., Janet Woodcock, M.D., and Richard Platt, M.D.

N Engl J Med 2011; 364:498-499

The FDA Sentinel Initiative — An Evolving National Resource

Richard Platt, M.D., Jeffrey S. Brown, Ph.D., Melissa Robb, M.S., Mark McClellan, M.D., Ph.D., Robert Ball, M.D., M.P.H., Michael D. Nguyen, M.D., and Rachel E. Sherman, M.D., M.P.H.

N Engl J Med 2018; 379:2091-2093



**Real-world evidence: Trends and application of real-world data in
drug development and safety**

The Sentinel Experience

Darren Toh, ScD



<https://www.sentinelinitiative.org/>



darren_toh@harvardpilgrim.org



[@darrentoh_epi](#)