DIA

Real-World Evidence Conference

October 16-17 Baltimore, MD



Unexpected Issues in Pharmacoepidemiology Studies Applying Natural Language Processing to Clinical Notes

Multi-source Observational Safety Study for Advanced Information Classification using NLP

Sentinel Operations Center/Harvard
Cerner Enviza
John Snow Labs



Disclaimer

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This presentation is incomplete without accompanying verbal commentary.



The FDA Sentinel System

Darren Toh, ScD
DPM Endowed Professor
Department of Population Medicine
Harvard Medical School and Harvard Pilgrim Health Care Institute



Public Law 110–85 110th Congress

An Act

To amend the Federal Food, Drug, and Cosmetic Act to revise and extend the user-fee programs for prescription drugs and for medical devices, to enhance the postmarket authorities of the Food and Drug Administration with respect to the safety of drugs, and for other purposes.

Sept. 27, 2007 [H.R. 3580]

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

SECTION 1. SHORT TITLE.

This Act may be cited as the "Food and Drug Administration Amendments Act of 2007".

Food and Drug Administration Amendments Act of 2007. 21 USC 301 note.

SEC. 905. ACTIVE POSTMARKET RISK IDENTIFICATION AND ANALYSIS.

- (a) IN GENERAL.—Subsection (k) of section 505 of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 355) is amended by adding at the end the following:
 - "(3) ACTIVE POSTMARKET RISK IDENTIFICATION.—
 - "(A) DEFINITION.—In this paragraph, the term 'data' refers to information with respect to a drug approved under this section or under section 351 of the Public Health Service Act, including claims data, patient survey data, standardized analytic files that allow for the pooling and analysis of data from disparate data environments, and any other data deemed appropriate by the Secretary.
 - "(B) DEVELOPMENT OF POSTMARKET RISK IDENTIFICA-TION AND ANALYSIS METHODS.—The Secretary shall, not later than 2 years after the date of the enactment of the Food and Drug Administration Amendments Act of 2007, in collaboration with public, academic, and private entities—
 - "(i) develop methods to obtain access to disparate data sources including the data sources specified in subparagraph (C);
 - "(ii) develop validated methods for the establishment of a postmarket risk identification and analysis system to link and analyze safety data from multiple sources, with the goals of including, in aggregate—
 - "(I) at least 25,000,000 patients by July 1,

2010; and

"(II) at least 100,000,000 patients by July 1, 2012; and

- "(iii) convene a committee of experts, including individuals who are recognized in the field of protecting data privacy and security, to make recommendations to the Secretary on the development of tools and methods for the ethical and scientific uses for, and communication of, postmarketing data specified under subparagraph (C), including recommendations on the development of effective research methods for the study of drug safety questions.
- "(C) ESTABLISHMENT OF THE POSTMARKET RISK IDENTI-FICATION AND ANALYSIS SYSTEM.—
 - "(i) IN GENERAL.—The Secretary shall, not later than 1 year after the development of the risk identification and analysis methods under subparagraph (B), establish and maintain procedures—

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Public Lav

To amend the user-fee prog the postmark to the safety

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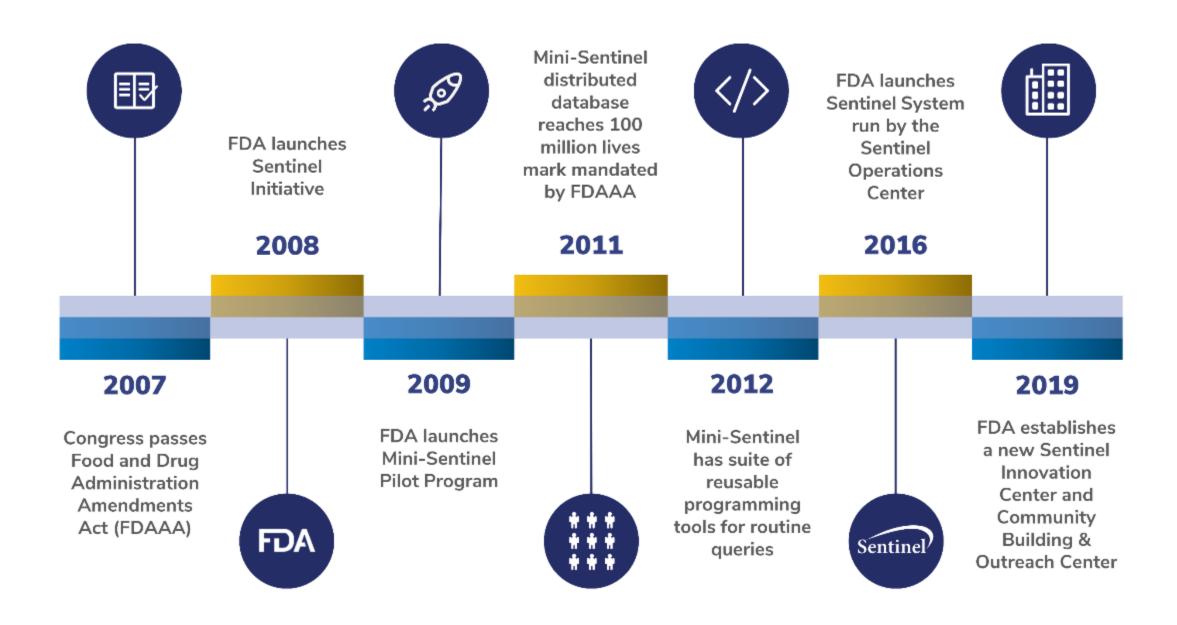
This Act

Establishment of a postmarket risk identification and analysis system to link analyze safety data from multiple sources

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https://www.sentinelinitiative.org/about

Collaborating Institutions

Sentinel Operations Center Lead: Harvard Pilgrim Health Care Institute

- Brigham and Women's Hospital: Division of Pharmacoepidemiology
 & Pharmacoeconomics in the Department of Medicine
- Carelon Research/Elevance Health
- CVS Health (Aetna)
- Duke University School of Medicine, Department of Population Health Sciences (Medicare Fee-for-Service and Medicaid data)
- Harvard T.H. Chan School of Public Health
- HCA Healthcare
- Health Partners Institute
- HealthVerity
- Humana Healthcare Research
- Kaiser Permanente Colorado
- Kaiser Permanente Hawaii
- Kaiser Permanente Mid-Atlantic
- Kaiser Permanente Northwest

- Kaiser Permanente Washington
- Marshfield Clinic Research Institute
- Merative
- Meyers Health Care Institute
- Optum
- TriNetX
- University of Florida College of Pharmacy, Department of Pharmaceutical Outcomes and Policy
- University of North Carolina Gillings School of Global Public Health
- University of Pennsylvania Perelman School of Medicine, Center for Clinical Epidemiology and Biostatistics
- University of Washington School of Public Health
- Vanderbilt University Medical Center (Tennessee Medicaid data)









Diagnosed with Hypertension Routine Office Visit

2017 2018 2018 2019 2019 2020

1/1/2017

Encounter

Office Visit Diagnosis: Influenza with pneumonia

Dispensings

Prescription: Antibiotic 3/15/2018

Encounters

Emergency Department Procedure: Appendectomy

3/15/2018 - 3/18/2018

Hospital: Inpatient Stay 12/11/2018

Encounter

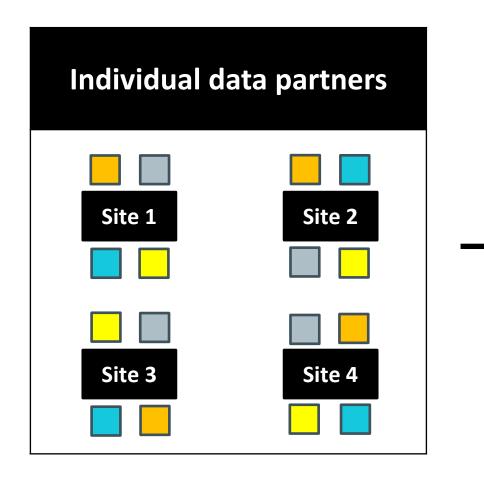
Office Visit Diagnosis: Hypertension

Dispensings

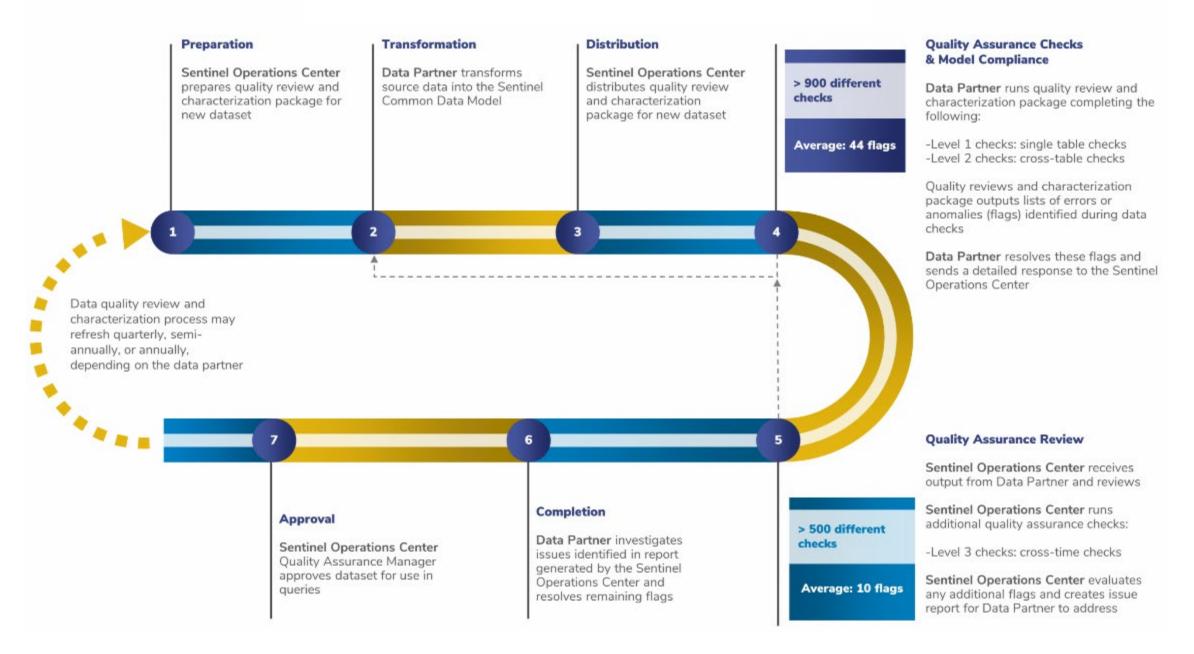
Prescription: Anti-hypertensive 10/31/2019

Encounter

Office Visit Diagnosis: Hypertension







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

Guidance for Industry and FDA Staff

Best Practices for Conducting and Reporting Pharmacoepidemiologic Safety Studies Using Electronic Healthcare Data



SENTINEL DATA QUALITY ASSURANCE PRACTICES

COMPLIANCE WITH "GUIDANCE FOR INDUSTRY AND FDA STAFF: BEST PRACTICES FOR CONDUCTING AND REPORTING PHARMACOEPIDEMIOLOGIC SAFETY STUDIES USING ELECTRONIC **HEALTHCARE DATA"**

Real-World Data: Assessing Electronic Health Records and Medical Claims Data To Support Regulatory Decision-Making for Drug and Biological **Products**

Guidance for Industry

DRAFT GUIDANCE

Sentinel Common Data Model

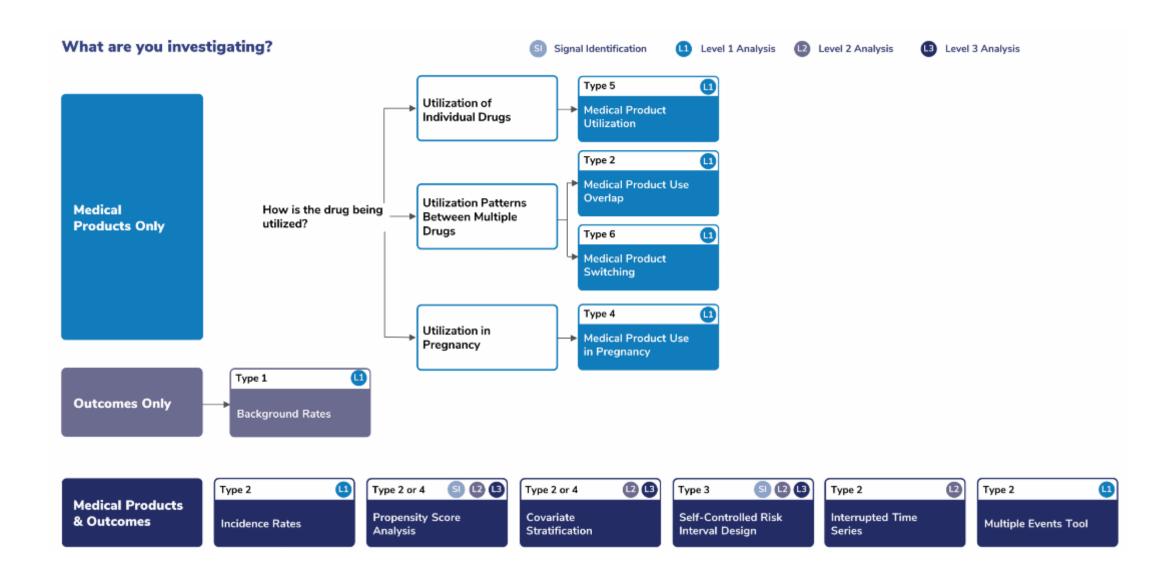
Administrative Data						Mother-Infant Linkage Data	Auxilia	ry Data	
Enrollment	Demographic	Dispensing	Encounter	Diagnosis	Procedure	Prescribing	Mother-Infant Linkage	Facility	Provider
Patient ID	Patient ID	Patient ID	Patient ID	Patient ID	Patient ID	Patient ID	Mother ID	Facility ID	Provider ID
Enrollment Start & End Dates	Birth Date	Provider ID	Encounter ID & Type	Encounter ID & Type	Encounter ID & Type	Encounter ID	Mother Birth Date	Facility Location	Provider Specialty & Specialty Code Type
Medical Coverage	Sex	Dispensing Date	Service Date(s)	Provider ID	Provider ID	Provider ID	Encounter ID & Type		
Drug Coverage	Postal Code	Rx	Facility ID	Service Date(s)	Service Date(s)	Order Date	Mother Admission & Discharge Date		
Medical Record Availability	Race	Rx Code Type	Etc.	Diagnosis Code & Type	Procedure Code & Type	Rx	Child ID		
	Etc.	Days Supply		Principal Discharge Diagnosis	Etc.	Days Supply	Childbirth Date		
		Amount Dispensed				Rx Route of Delivery	Mother-Infant Match Method		
						Etc.	Etc.		

Registry Data					
Death	Cause of Death	State Vaccine*			
Patient ID	Patient ID	Patient ID			
Death Date	Cause of Death	Vaccination Date			
Date Imputed Flag	Source	Admission Date			
Source	Confidence	Vaccine Code & Type			
Confidence	Etc.	Provider			
Etc.		Etc.			

Inpatient Data			
Inpatient Pharmacy	Inpatient Transfusion		
Patient ID	Patient ID		
Encounter ID	Encounter ID		
Rx Administration Date & Time	Transfusion Administration ID		
National Drug Code (NDC)	Administration Start & End Date & Time		
Rx ID	Transfusion Product Code		
Route	Blood Type		
Dose	Etc.		
Etc.			

Clinical Data			
Lab Result	Vital Signs		
Patient ID	Patient ID		
Result & Specimen Collection Dates	Measurement Date & Time		
Test Type, Immediacy & Location	Height & Weight		
Logical Observation Identifiers Names and Codes (LOINC®)	Diastolic & Systolic BP		
Etc.	Tobacco Use & Type		
	Etc.		

Patient-Reported Measures (PRM) Data			
PRM Survey	PRM Survey Response		
Measure ID	Patient ID		
Survey ID	Encounter ID		
Question ID	Measure ID		
Etc.	Survey ID		
	Question ID		
	Response Text		
	Etc.		

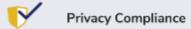


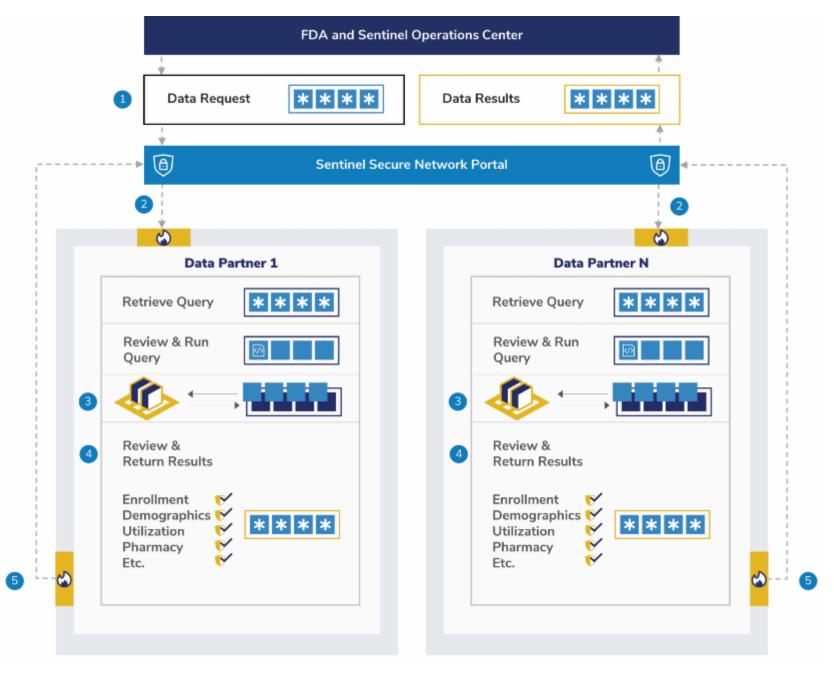


- Data Partners retrieve query
- 3 Data Partners review and run query against their local data behind their firewalls
- Data Partners review results for accuracy and privacy compliance
- Data Partners return deidentified results to SOC via secure portal









463 million
unique patient
identifiers
(2000-2023)

1.1 billion

person-years of data* 113 million
members
currently
accruing data*

20 billion pharmacy dispensing*

20 billionmedical
encounters*

8 million
deliveries with
mom-baby
linkage

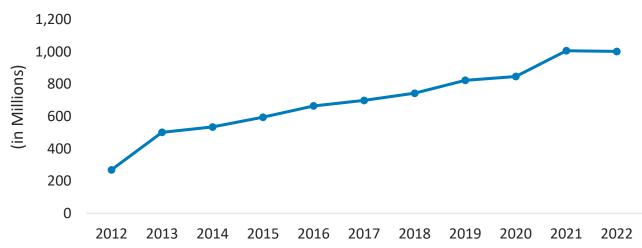
Table	DP Count	Member Count	Record Count
Laboratory Results	11	99,358,668	8,857,509,772
Vital Signs	7	10,636,075	368,812,494
Prescribing	3	3,271,299	162,101,760

Members with Medical and Drug Coverage who Have at least One Vital Sign Measurement, by Vital Sign Measure

Vital Sign	Member Count
Diastolic Blood Pressure	6,253,679
Systolic Blood Pressure	6,254,628
Weight	6,416,934
Height	5,942,271

Growth in Laboratory Result Data By Year

Total Laboratory Result Records



Sentinel's Multi-Modal Response System

Claims (with Limited EHR Network)

Active Risk Identification and Analysis (ARIA)*

Sentinel Distributed Database

 Comprises commercial insurers, integrated delivery systems, Medicare fee-for-service, and Medicaid/CHIP

Merative™ MarketScan® Research Databases

- Sentinel Common Data Model
- Sentinel analytic tools

EHR Data

HCA Healthcare

- Data warehouses for multiple healthcare organizations in a system
- Custom programming

TriNetX

- Aggregation of data from multiple healthcare organizations across systems
- Web-based querying interface

^{*}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.

Conduct studies for safety concerns that arise during the review of an application for a new drug or biologic





NDA 211801

Suite 100

NDA APPROVAL

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

Fremont, CA 94555

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.

Examine medication safety during pregnancy

Received: 11 April 2022 Revised: 14 July 2022 Accepted: 21 July 2022

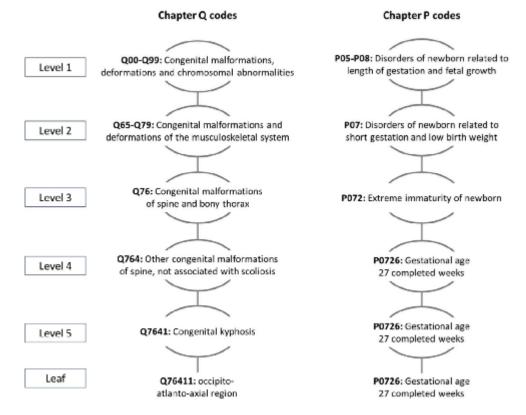
DOI: 10.1002/pds.5512

ORIGINAL ARTICLE

WILEY

Novel methods for pregnancy drug safety surveillance in the FDA Sentinel System

Elizabeth A. Suarez¹ | Michael Nguyen² | Di Zhang³ | Yueqin Zhao³ |
Danijela Stojanovic² | Monica Munoz⁴ | Jane Liedtka⁵ | Abby Anderson⁶ |
Wei Liu⁷ | Inna Dashevsky¹ | David Cole¹ | Sandra DeLuccia¹ |
Talia Menzin¹ | Jennifer Noble¹ | Judith C. Maro¹



Inform label change



JNCI Cancer Spectrum (2021) 5(2): pkab009

doi: 10.1093/jncics/pkab009 First published online 4 February 2021

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

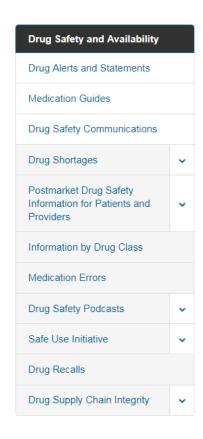
Efe Eworuke (6), PhD, 1.4 Nicole Haug, MPH, 2 Marie Bradley (6), PhD, 1 Austin Cosgrove, BS, 2 Tancy Zhang, MPH, 2 Elizabeth C. Dee, MPH, 2 Sruthi Adimadhyam (B. PhD2 Andrew Petrone, MPH, 2 Hana Lee, PhD, 3 Tiffany Woodworth (b), MPH,2 Sengwee Toh, ScD2

Postmarketing Experience:

Non-melanoma Skin Cancer

Hydrochlorothia<u>zide is associate</u>d 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 ≥50,000 mg the risk increase was approximately 1 additional SCC case for every 6,700 patients per year.

Contribute to FDA Drug Safety Communication



FDA Drug Safety Communication: Update on the risk for serious bleeding events with the anticoagulant Pradaxa (dabigatran)

The FDA has issued new information about this safety issue, see the **FDA Drug Safety Communication** issued 05-13-2014.

This update is a follow-up to the **FDA Drug Safety Communication of 12/7/2011**: Safety review of post-market reports of serious bleeding events with the anticoagulant Pradaxa (dabigatran etexilate mesylate)

Safety Announcement
Additional Information for Patients
Additional Information for Healthcare Professionals
Data Summary
References

Safety Announcement

[11-02-2012] The U.S. Food and Drug Administration (FDA) has evaluated new information about the risk of serious bleeding associated with use of the anticoagulants (blood thinners) dabigatran (Pradaxa) and warfarin (Coumadin, Jantoven, and generics). Following the approval of Pradaxa, FDA received a large number of post-marketing reports of bleeding among Pradaxa users. As a result, FDA investigated the actual rates of gastrointestinal bleeding (occurring in the stomach and intestines) and intracranial hemorrhage (a type of bleeding in the brain) for new users of Pradaxa compared to new users of warfarin. This assessment was done using insurance claims and administrative data from FDA's Mini-Sentinel pilot of the Sentinel Initiative. The results of this Mini-Sentinel assessment indicate that bleeding rates associated with new use of Pradaxa do not appear to be higher than bleeding rates associated with new use of warfarin, which is consistent with observations from the large clinical trial used to approve Pradaxa (the RE-LY trial). (see Data Summary). FDA is continuing to evaluate multiple sources of data in the ongoing safety review of this issue.

Generate timely evidence during pandemic

Original Investigation

August 16, 2022

Association of COVID-19 vs Influenza With Risk of Arterial and Venous Thrombotic Events Among Hospitalized Patients

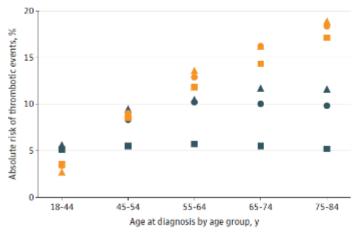
Vincent Lo Re III, MD, MSCE^{1,2}; Sarah K. Dutcher, PhD³; John G. Connolly, ScD⁴; Silvia Perez-Vilar, PharmD, PhD³; Dena M. Carbonari, MS²; Terese A. DeFor, MS⁵; Djeneba Audrey Djibo, PhD⁶; Laura B. Harrington, PhD, MPH⁷; Laura Hou, MS⁴; Sean Hennessy, PharmD, PhD²; Rebecca A. Hubbard, PhD²; Maria E. Kempner, BA⁴; Jennifer L. Kuntz, PhD⁶; Cheryl N. McMahill-Walraven, PhD⁶; Jolene Mosley, MS⁴; Pamala A. Pawloski, PharmD⁵; Andrew B. Petrone, MPH⁴; Allyson M. Pishko, MD, MSCE⁹; Meighan Rogers Driscoll, MPH⁴; Claudia A. Steiner, MD, MPH¹⁰; Yunping Zhou, MS¹¹; Noelle M. Cocoros, DSc, MPH⁴

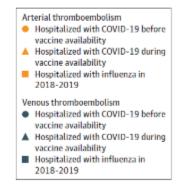
□ Author Affiliations | Article Information

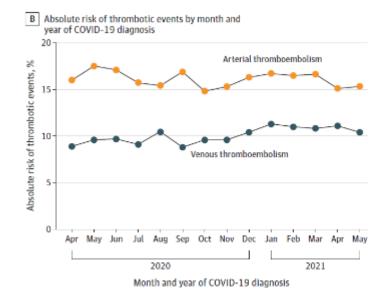
JAMA, 2022;328(7):637-651, doi:10.1001/jama.2022.13072

Figure. Absolute Risk of Inpatient Arterial and Venous Thrombotic Events

A Absolute risk of thrombotic events by age group for patients hospitalized with COVID-19 before vaccine availability (Apr 1-Nov 30, 2020) and during vaccine availability (Dec 1, 2020-May 31, 2021) vs patients hospitalized with influenza (Oct 1, 2018-Apr 30, 2019)







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 | 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 | Med 2018; 379:2091-2093

The US Food and Drug Administration Sentinel System: a national resource for a learning health system

Jeffrey S. Brown (6)¹, Aaron B. Mendelsohn¹, Young Hee Nam¹, Judith C. Maro (6)¹, Noelle M. Cocoros¹, Carla Rodriguez-Watson², Catherine M. Lockhart³, Richard Platt¹, Robert Ball (1)⁴, Gerald J. Dal Pan⁴, and Sengwee Toh¹

> Journal of the American Medical Informatics Association, 00(0), 2022, 1–10 https://doi.org/10.1093/jamia/ocac153

Six Years of the US Food and Drug Administration's Postmarket Active Risk Identification and Analysis System in the Sentinel Initiative: Implications for Real World Evidence Generation

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Judith C. Maro<sup>1,*</sup> , Michael D. Nguyen<sup>2</sup>, Joy Kolonoski<sup>1</sup>, Ryan Schoeplein<sup>1</sup>, Ting-Ying Huang<sup>1</sup>, Sarah K. Dutcher<sup>2</sup>, Gerald J. Dal Pan<sup>2</sup> and Robert Ball<sup>2</sup>
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CLINICAL PHARMACOLOGY & THERAPEUTICS doi:10.1002/cpt.2979

ARTICLE

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Judith C. Maro * 10, Michael D. Nguyen . Joy Kolonoski , Ryan Schoepkein 10. Ting-Ying Huang 10, Sarah K. Dutcher 10, Gerald J. Dal Pan 10 and Robert Ball 10.

CLINICAL PHARMACOLOGY & THERAPEUTICS doi:10.1002/cpt.2979

Table 4 Reasons for determinations of ARIA insufficiency

Reasons for insufficiency	Number of determinations	Example	Direction of future development
Insufficient supplemental structured clinical data	89	Lack of laboratory, imaging, or vital signs data	Addressable with the addition of EHR data elements into ARIA 35,36
Inability of ARIA tools to perform required analysis	82	Insufficient signal identification tool	ARIA has integrated signal identification abilities (Figure 1) ^{16–18}
Study requires data elements captured in unstructured clinical data, such as clinical notes	73	Lack of radiology or pathology findings in notes	Addressable with development of feature engineering capabilities to extract and structure these data ³⁷
Absence of validated code algorithm	72	No gold-standard chart review was performed for outcome of interest	Sentinel has performed several gold standard chart validations but these require substantial resources. Efforts underway to investigate rapid silver standard reviews,
Identification of clinical concepts with available code algorithms/terminologies is not possible or inadequate	60	Codes do not exist for concept or validated performance characteristics are inadequate	Potentially addressable with added EHR elements but if outcome is not well-defined or new (e.g., long COVID), there may be substantial hurdles to identification
Inadequate sample size	57	Low uptake of drug	Non-actionable as ARIA is the largest system of its kind
Requires linkage to additional data source that is unavailable	52	Inability to ascertain cause of death	Additional linkages are possible with significant financial resources
Insufficient observation time available	44	Inability to follow patients across healthcare plans or systems	Actionable with substantial further research and development and resolution of data governance issues ⁴³
Insufficient mother-infant linkage	24	Lack of ability to connect mothers and infants	Resolved with 2018 integration of Mother- Infant Linkage table ¹⁵
Insufficient inpatient data	18	Inability to access granular inpatient pharmacy information	Resolved with partnerships with inpatient healthcare systems ¹⁰
Inability to identify over-the-counter medication use	8	Over-the-counter medication use not captured	Inherent limitation of both claims and EHR data
Insufficient race capture of information on race	3	Race is not well-captured	FDA is working with Data Partners to understand approaches for better capture of this data
Insufficient representation of the population of interest	1	Limited generalizability based on commercial claims data	Sentinel added Medicare data in 2018 and Medicaid in 2022

ARIA, Active Risk Identification and Analysis; COVID, coronavirus disease; EHR, electronic health record; FDA, US Food and Drug Administration.

ARTICLE

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ARIA, Active Risk Identification and Analysis; COVID, coronavirus disease; EHR, electronic health record; FDA, US Food and Drug Administration.



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← Home / News & Events / FDA Newsroom / FDA Voices / FDA Budget Matters: A Cross Cutting Data Enterprise for Real World Evidence

FDA Budget Matters: A Cross-Cutting Data **Enterprise for Real World Evidence**

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FDA Voices

June 10, 2018

By: Scott Gottlieb, M.D.

Over time, as our experience with new medical products expands, our knowledge about how best to maximize their benefits and minimize any potential risks, sharpens with each data point we gather. Every clinical use of a product produces data that can help better inform us about its safety and efficacy.

The FDA is committed to developing new tools to help us access and use data collected from all sources. This includes ways to expand our methodological repertoire to build on our understanding of medical products throughout their lifecycle, in the post market. We don't limit our knowledge to pre-market information, traditional de novo post-market studies, and passive reporting. Newer methodologies enable us to collect data from routine medical care and develop valid scientific

FDA Commissioner Scott Gottlieb, MD

evidence that's appropriate for regulatory decision making to help patients and health care providers prevent, diagnose, or treat diseases.

Content current as of:

07/25/2018

Regulated Product(s) Biologics Medical Devices





Sentinel Innovation Center Master Plan

Sentinel Innovation Center

Version 1.1

June 17, 2021

The Sestinal System is appearanced by the <u>U.S. Food and Drop Administration (FDA)</u> to proactively monitor the safety of FDA-regulated resolical products and complements other existing FDA andisty surveillance capabilities. The Seatinal System is one giological of FDA's <u>Seatinal Initiative</u>, a language multi-facehold efforts to develop a national electronic system. Sential Cellularantees include Data

and Academic Purtners that provide uccess to healthcure duto and angoing scientific, technical, methodological, and arganizational expertise. The Sentinel Initiative is funded by the FDA through the Department of Health and Human Services (HHS) Contract number 75P40119D10037. The Sentinel Innovation Center is funded by the FDA through HHS Contest number 7540119010037.

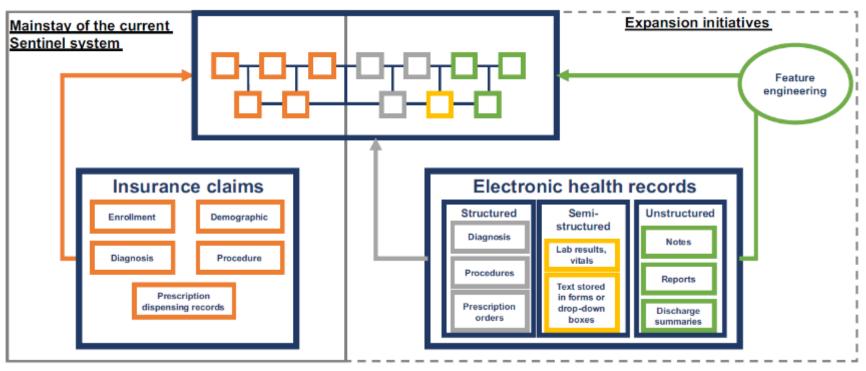
PERSPECTIVE OPEN

Broadening the reach of the FDA Sentinel system: A roadmap for integrating electronic health record data in a causal analysis framework

Rishi J. Desai (b) Michael E. Matheny (b), Kevin Johnson², Keith Marsolo³, Lesley H. Curtis³, Jennifer C. Nelson⁴, Patrick J. Heagerty⁵, Judith Maro (b), Jeffery Brown (c), Sengwee Toh⁶, Michael Nguyen⁷, Robert Ball (b), Gerald Dal Pan⁷, Shirley V. Wang (c), Joshua J. Gagne^{1,8} and Sebastian Schneeweiss¹

npj Digital Medicine (2021) 170

Sentinel Common Data Model



Current Sentinel System Limitations

Inability to identify certain study populations of interest from insurance claims

Inability to identify certain outcomes of interest from insurance claims

Other limitations
(inadequate duration of
follow-up, the need for
additional signal
identification tools)

Sentinel Innovation Center Initiatives

Data infrastructure (DI)



Causal inference (CI)

 Methodologic research to address specific challenges when using EHRs such as approaches to handle missing data, calibration methods for enhanced confounding adjustment

Feature engineering (FE)

 Emerging methods including machine learning and scalable automated natural language processing (NLP) approaches to enable computable phenotyping from unstructured EHR data

Detection analytics (DA)

 Development of signal detection approaches to account for and leverage differences in data content and structure of EHRs

Sentinel Innovation Center Vision

A query-ready, qualitychecked distributed data network containing EHR for at least 10 million lives with reusable analysis tools

2020 2024

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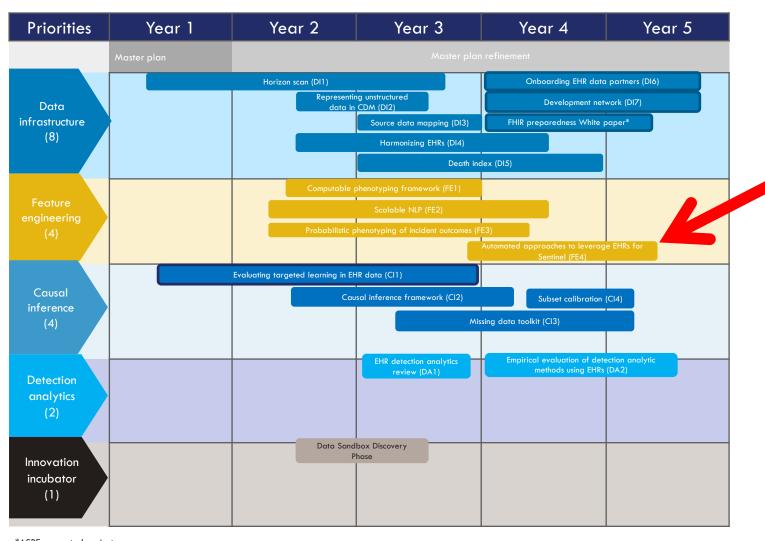
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Sentinel Innovation Center Vision

A query-ready, qualitychecked distributed data network containing EHR for at least 10 million lives with reusable analysis

2020



^{*}ASPE supported project



Request for Proposal

Sentinel Innovation Center:

Enhancing the validity of pharmacoepidemiology studies through the inclusion of semi-structured and unstructured electronic health record (EHR) data in confounding adjustment and outcome ascertainment

Department of Population Medicine

Harvard Medical School / Harvard Pilgrim Health Care Institute

Landmark Center 401 Park Drive Suite 401 Boston, MA 02215

March 2022

MOSAIC-NLP

Multi-source Observational Safety study for Advanced Information Classification using NLP

Dena Jaffe, PhD

Dena.Jaffe@oracle.com



Project Team

FDA

- Sarah Dutcher, Epidemiologist
- Jummai Apata, Epidemiologist
- · Robert Lim, Medical Officer
- Jie (Jenni) Li, Epidemiologist
- Jamal Jones, Epidemiologist
- Yong Ma, Biostatistician
- Tiffany Austin, Project Manager

Sentinel Operations Center/Harvard

- Meighan Driscoll, Program Manager
- Kimberly Gegear, Project Manager
- Darren Toh, Coinvestigator,
 Pharmacoepidemiologist
- **Jenna Wong**, Pharmacoepidemiologist

Mass General Brigham

- Richard Wyss, Co-Investigator, Epidemiologist
- Jie Yang, Principal Investigator
- · Rishi Desai, Operations Chief
- Josh Lin, Epidemiologist

Cerner Enviza, an Oracle Company

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- Dena Jaffe, Principal Investigator, Epidemiologist
- Jenny Cai, Project Manager
- Sonam Lama, Project Manager
- Nathan Vavroch, Data Strategist
- Mike Jones, Data Strategist
- Vineela Kommuri, Senior Data Engineer
- Sravan Kumar Burla, Software Engineer
- Bridget Balkaran, Lead Biostatistician
- Austin Yue, Biostatistician
- Kyla Finlayson, Biostatistician
- **Stacey Purinton**, Data Manager
- Rob Taylor, Data Manager
- Eliza Celenti, Medical Writer

National Jewish Health

- Michael Wechsler, Pulmonologist
- David Beuther, Pulmonologist
- Pearlanne Zelarney, Research Informatics
- Alicia Mitchell, Developer
- Sarah Rhoads, Pulmonologist

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- Louis Ehwerhemuepha, Clinical Data Scientist
- Hoang Nguyen, Psychiatrist
- Michael Chu, Psychiatrist
- Heather Huszti, Psychologist
- Olga Guijon, Pediatrician and Asthma specialist

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- David Talby, CTO
- Ace Vo, Project Manager
- Hasham UI Haq, Lead Senior NLP Data Scientist
- Veysel Kocaman, Data Scientist
- Gursev Pirge, Data Scientist
- · Ahmet Emin Tek, Data Scientist
- Andrei Marian Feier, Clinical Annotation Lead
- **Denisa Popa**, Data Annotator
- · Aleksei Zhakarov, Annotator
- Jav Gil, Annotator
- Zhenya Nargizyan, Annotator
- Jiri Dobles, Project Manager

Kaiser Permanente Washington Health Research Institute

• David Carrell, NLP Expert Consultant

Use of Natural Language Processing in a Pharmacoepidemiology Study: The Examination of Neuropsychiatric Events and Incident Use of Montelukast Among Patients with Asthma

To demonstrate...in a pharmacoepidemiology study

Value

of using claims and EHR (structured/semistructured/unstructured)

Scalability

of an NLP model for clinical notes across the Oracle EHR RWD ~120 healthcare systems

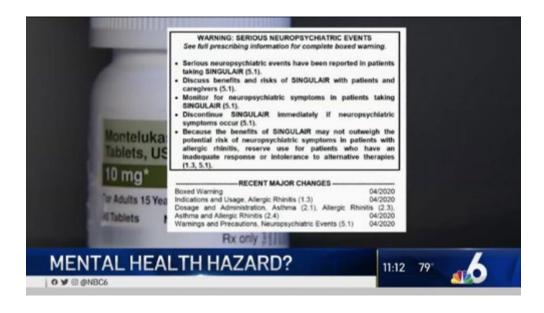
Transportability

of trained and tuned NLP models in 2 external EHR datasets

Case for Action

Montelukast, a leukotriene-modifying agent (LTMA) is **US guideline recommended** for the treatment of asthma for all ages

- FDA approval in 1998
- In 2008 FDA warned of reports of suicidality and neuropsychiatric event associated with montelukast
- In 2020 FDA issues a Boxed Warning of neuropsychiatric adverse events based on expert panel determination as RWE was equivocal
- Sansing-Foster et al 2021 (Claims; Sentinel)
- Paljarvi et al 2022 (EHR)



Value

of using claims and EHR (structured/semistructured/unstructured)

MOSAIC-NLP

Study design: Retrospective cohort study

Study data: EHR-claims linked data (2015-2022)

Study cohort: Patients with asthma newly initiating montelukast or inhaled corticosteroids

Study outcomes: Neuropsychiatric events

Data source Study stage	Cohort	Covariates	Outcomes		
Study 1	EHR-s/us + claims	Claims	Claims		
Study 2	EHR-s/us + claims	EHR-s + claims	EHR-s + claims		
Study 3	EHR-s/us + claims	EHR-s/us + claims	EHR-s/us + claims		

Scalability

of an NLP model for clinical notes across the Oracle EHR RWD 100+ healthcare systems

MOSAIC-NLP

Study cohort: 109,076 patients

Healthcare systems: 119

Clinical notes: 17+ million

EHR Oracle RWD

105 million patients

LNH member healthcare systems

- > Pediatric hospitals
- Critical access hospitals
- > IDN
- > Acute care hospitals
- > Physician groups



125M

emergency encounters

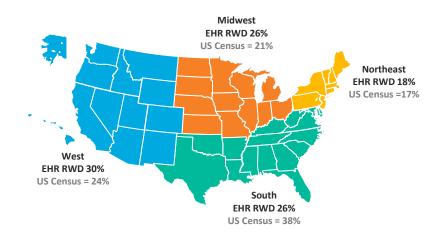


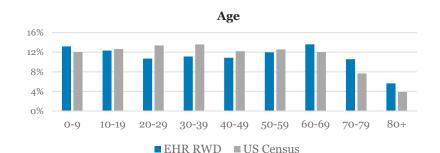
56M

inpatient encounters



972M outpatient encounters





Claims

- 200 million patients
- **Closed** medical and pharmacy claims
 - Commercial
 - Medicare Advantage
 - Medicaid Managed Care
- National representation

Considerations for NLP Entity Extraction at Scale

De-identification of notes

- Acceptable level of de-identification
- Separate workspace

Training set

• Sampling frame – healthcare system, age, note type

Entity identification

- Outcomes boxed warning
- Covariates
- Rare entities/events
- Questionnaires (semi-structured data)



Considerations When Creating Training Dataset for Annotation

Healthcare system

Cannot assume EHR features are similar across healthcare systems or facilities

- Copy-pasting in notes
- Templates
- 'Required' fields
- Use of EHR platform for note taking
- Use of decimal points

Age group

Treatment and care differ for children and adults

- Diagnoses
- Symptoms
- Concerns
- Treatment



Note type

Variability between note type content and value

- Facility (ER vs clinic)
- Physician type (psychiatrist vs GP)
- Discharge note vs progress note...



Neuropsychiatric Events

FDA's Boxed Warning

- Agitation, including aggressive behavior or hostility
- Attention problems
- · Bad or vivid dreams
- Depression
- · Disorientation or confusion
- Feeling anxious
- Hallucinations
- Irritability
- Memory problems
- Obsessive-compulsive symptoms
- Restlessness
- Sleepwalking
- Stuttering
- Suicidal thoughts and actions
- Tremor or shakiness
- · Trouble sleeping
- Uncontrolled muscle movements

Structured Data

Hospitalization/ER

OR

Diagnosis AND Treatment

- ☐ Depression
- ☐ Self harm
- ☐ Psychotic disorder
- ☐ Mood disorder
- ☐ Anxiety disorder
- □ OCD
- ☐ Manic or bipolar disorder
- ☐ Personality disorder
- ☐ Hyperactivity or aggressive behavior or harm

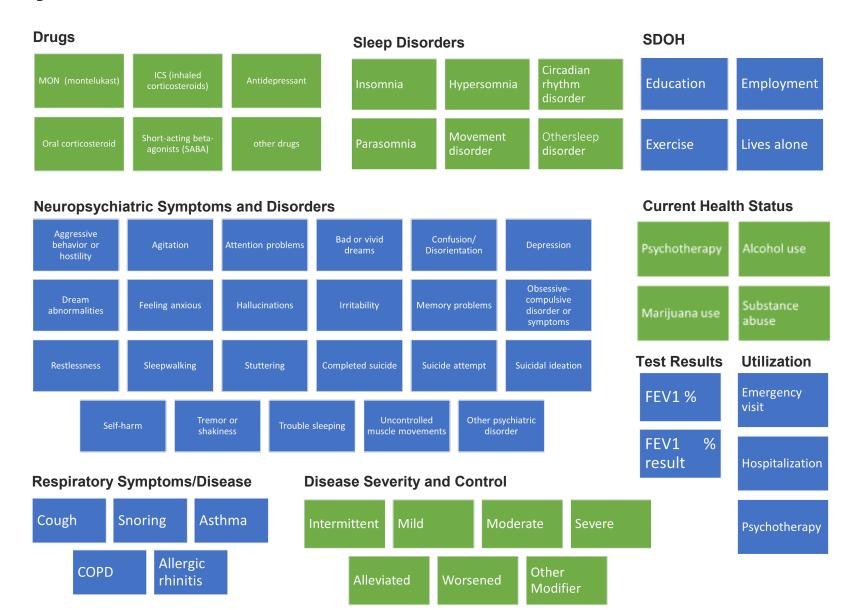
Treatment for sleep disorder diagnosis

- ☐ Insomnia
- ☐ Hypersomnia
- \square Circadian rhythm disorder
- ☐ Parasomnia
- ☐ Movement disorder
- ☐ Other undefined sleep disorder

Unstructured Data

- Aggressive behavior or hostility
- Agitation
- Attention problems
- Bad or vivid dreams
- Depression
- Disorientation or confusion
- Dream abnormalities
- Feeling anxious
- Hallucinations
- Irritability
- Memory problems
- ☐ Obsessive-compulsive symptoms
- Restlessness
- Sleepwalking
- Stuttering
- ☐ Suicidal thoughts and actions
- ☐ Tremor or shakiness
- ☐ Trouble sleeping
- ☐ Uncontrolled muscle movements

Taxonomy: 54 Named Entities



Entity – Example of Decisions

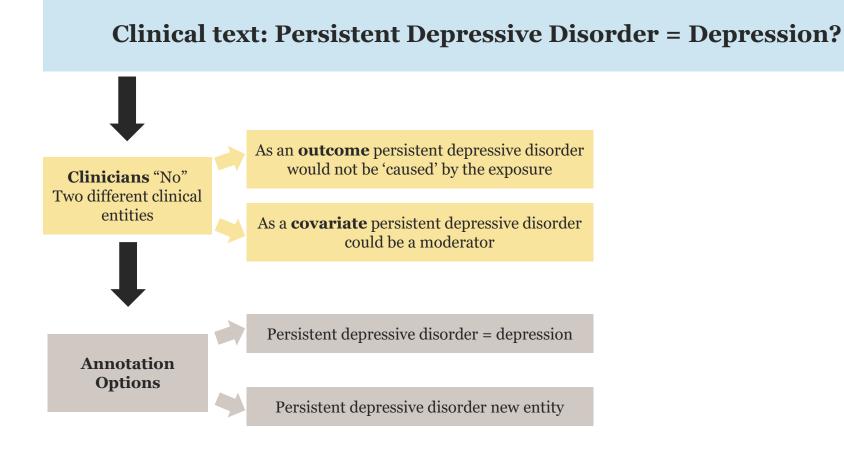
Clinical text: Persistent Depressive Disorder = Depression?



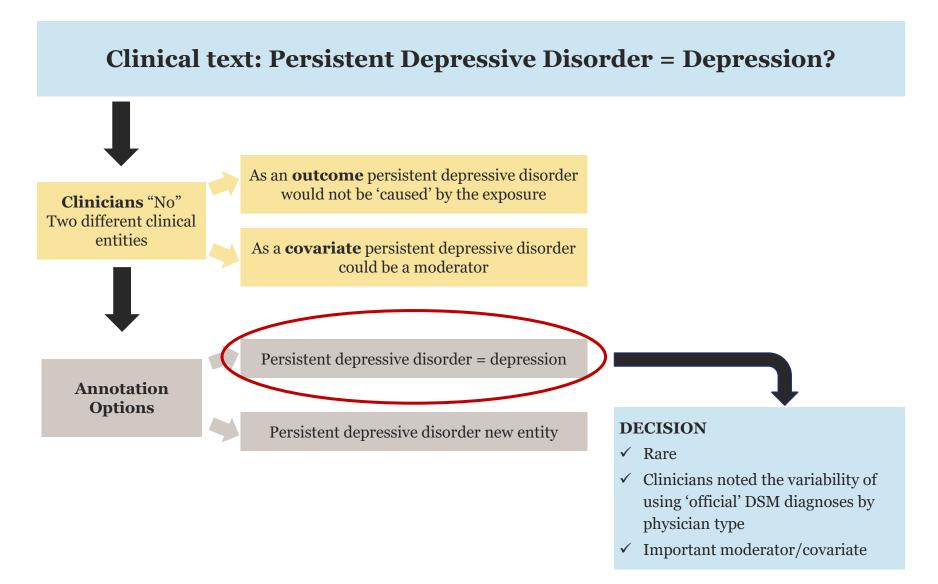
Clinicians "No" Two different clinical entities As an **outcome** persistent depressive disorder would not be 'caused' by the exposure

As a **covariate** persistent depressive disorder could be a moderator

Entity – Example of Decisions



Entity – Example of Decisions



Summary

- To our knowledge this is the first pharmacoepidemiology study to use linked EHR-claims data and extract semi/unstructured data at scale
- Methodology requires considerations related to the high degree of heterogeneity in the clinical notes
- Gather and use experts to build the NLP model:
 - ✓ NLP experts
 - ✓ Biostatisticians
 - ✓ Clinicians (subject matter experts)
 - ✓ Epidemiologists



MOSAIC-NLP Technical Aspects and Lessons Learned

Hasham UI Haq John Snow Labs

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Technology Stack & Rationale

Multiple methods of dealing with the problem

- Self/Unsupervised models
 - LLMs (ChatGPT/Llama)
 - Q&A approach
 - Prompt Engineering
 - Few-Shot Approach

- Less / no training required high generalization
- Easy to setup & use
- May not work as well for specific use-cases.
- Much more costly/difficult to train if required

- DL supervised approach
 - NER models BiLSTM

- Easy to train and adapt to use-cases.
- Comparable performance on specified use-cases.
- Computationally efficient.
- Training is required low generalization
- Bigger models may outperform

Technology Stack & Rationale

- Named Entity Recognition Models
- Transformers based models latest

	Bi-LSTM	Transformers		
Dataset	Spark NLP Clinical Emb.	Spark NLP Biobert (BFTC)	Spark NLP GloVe 6B Emb.	Stanza
NCBI- Disease	89.13	90.48	87.19	87.49
BC5CDR	89.73	90.89	88.32	88.08
BC4CHEMD	93.72	94.39	92.32	89.65
Linnaeus	86.26	82.20	85.51	88.27
Species800	80.91	82.59	79.22	76.35
JNLPBA	81.29	78.24	79.78	76.09
AnatEM	89.13	91.65	87.74	88.18
BioNLP13-CG	85.58	87.83	84.30	84.34

Factors to Consider While Choosing ML Model Architecure

- How many documents to process?
- What type of hardware resources are available?
- What is a feasible total runtime?

- The end goal is to process Tens of Millions of records.
- Avoid high costs of GPUs
 - Expensive to scale compared to CPUs.
- Develop efficient models that are performant in terms of memory and CPU utilization, while delivering comparable performance.

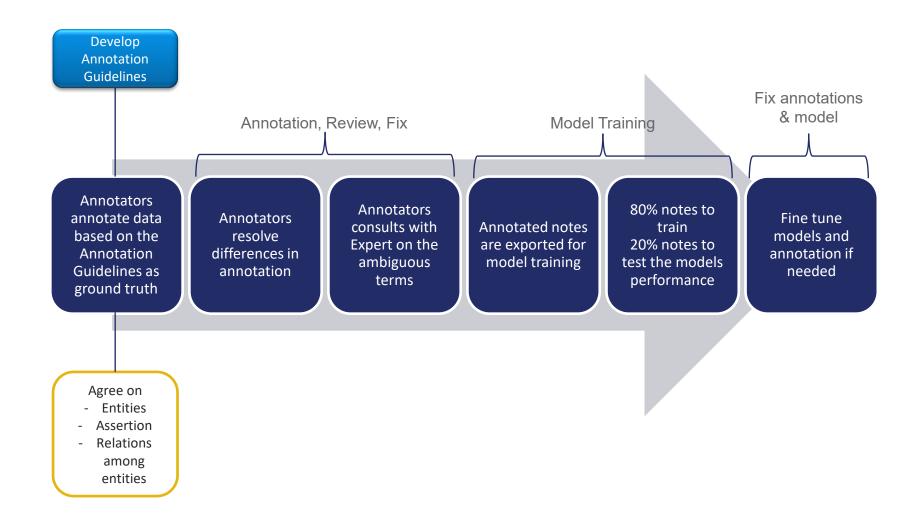
First Step: De-Identification of Documents

	sentence	deidentified
0	Record date: 2093-01-13, David Hale, M.D.	Record date : <date> , <name> , M.D .</name></date>
1	, Name : Hendrickson , Ora MR .	, Name : <name> MR .</name>
2	# 7194334\nDate : 01/13/93 PCP : Oliveira , 25 # <ii< th=""><th>D>\nDate: <date> PCP: <name>, <age> yea</age></name></date></th></ii<>	D>\nDate: <date> PCP: <name>, <age> yea</age></name></date>
3	Cocke County Baptist Hospital .	<hospital>.</hospital>
4	0295 Keats Street.	<street></street>
<	Notes UTMI parring Tokenizer	NER model #1 NER model #2 NER model #2 Nerged chunk Masking deidentified note NER model #1: ner_deid_generic_augmented NER model #1: ner_deid_subentity_augmented

De-Identification - Evaluation

- Total Notes: 100 randomly selected
- Occurrences of sensitive information: 1967
 - Name, Address, Date etc..
- Recall (sensitivity) = 93.54%

NLP Process Overview



Annotation Guidelines

- **54 Named Entities**: Word or series of words that refer to a specific concept
- **8 Assertions**: indicates an attribute of an entity
 - **Present**, Past, Absent, Family_history, someone_else, possible, planned, hypothetical

Agitation

In NLP Lab: Agitation

Definition: this entity contains mentions of clinical findings related to agitation. **Extraction rules:** do not extract additional information to the agitation findings.

Examples:

- 1. Acute episode of agitation Agitation. She was complaining that she felt she might have been poisoned at her care facility.
- 2. No psychomotor agitation Addition Absent or retardation. Speech is normal. No pressure of speech. No thought disorder.

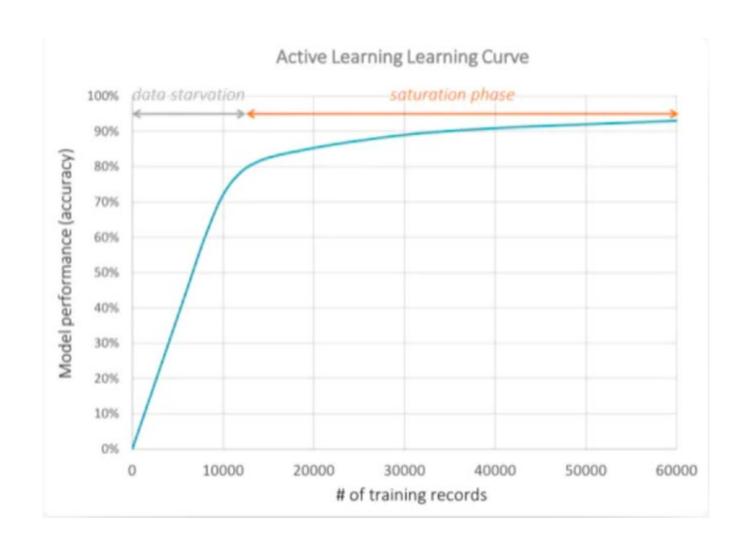
An Entity desrcibed in the Annotation Guideline

Annotations

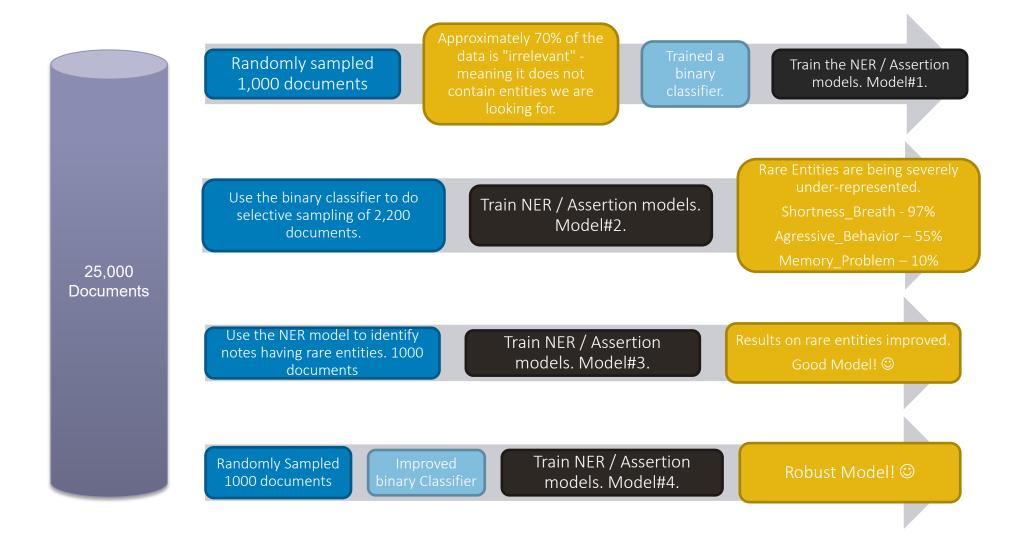
Annotation in NLP Lab



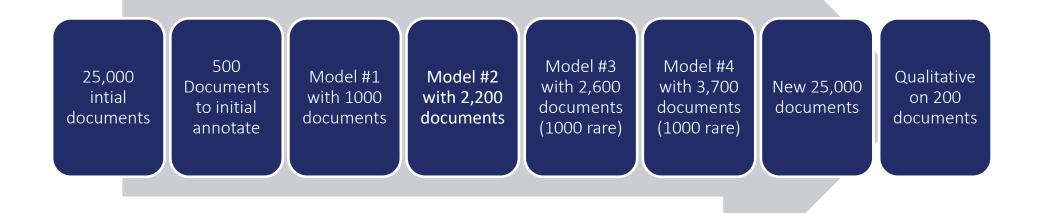
How Much Data to Annotate?



NLP Training and Evaluation Process



NLP Training and Evaluation Process



Quantitative vs Qualitative Evaluation

Quantitative

- Standard 80/20 Training / Test split.
- Evaluate results from models through metrics
- Can evaluate large number of documents
- Requires ground truth

Qualitative

- Evaluate results from model through SME
- Can only evaluate a subset of documents
- Review specific examples
- New batch of data, 200 documents

NER Quantitative Model Results

Date	Micro f-1	Macro f-1	NER Label under f-1 0.80
15-May	0.832	0.559	32
22-Jun	0.912	0.698	21
3-Jul	0.932	0.802	10
24-Jul	0.935	0.828	7

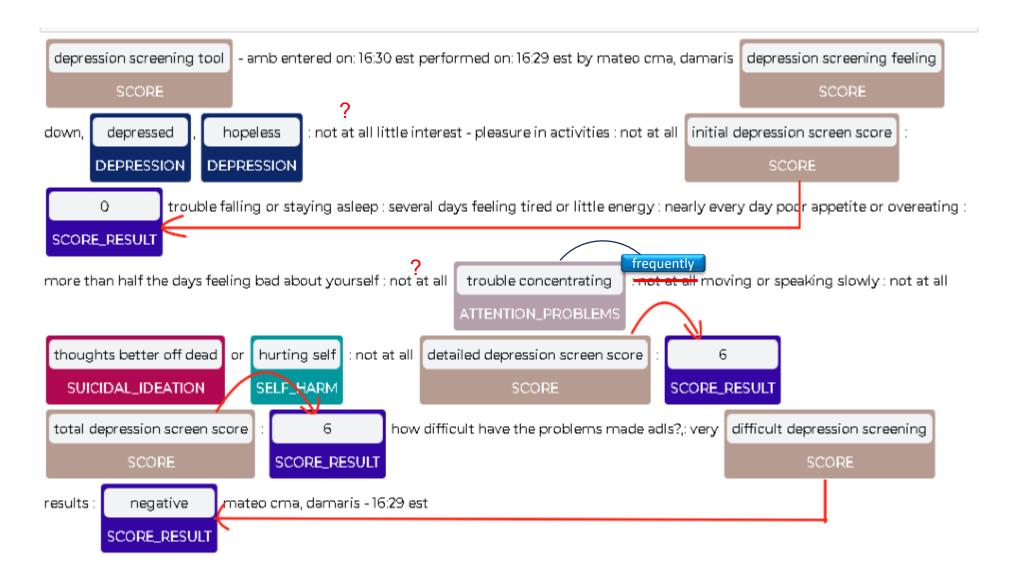
Examples of NER Label Accuracies

Original taxonomy included stuttering, but we had too few mentions in the notes (8 mentions in 25K notes)

Label	tp	fp	fn	total	precision	recall	f-1	Priority
Mon	216	0	1	217	1	0.995392	0.997691	3-High
Cough	511	6	1	518	0.988395	0.998047	0.993197	3-High
Copd	65	1	0	66	0.984849	1	0.992366	3-High
Snoring	49	1	0	50	0.98	1	0.989899	3-High
Short_Acting_Beta_Agonists	1040	6	16	1062	0.994264	0.984849	0.989534	3-High
Delusion	87	1	1	89	0.988636	0.988636	0.988636	3-High
Asthma	723	4	15	742	0.994498	0.979675	0.987031	3-High
Wheezing	452	11	4	467	0.976242	0.991228	0.983678	3-High
Dream_Abnormalities	568	19	0	587	0.967632	1	0.98355	3-High
Marijuana_Use	39	3	7	49	0.039571	0.847826	0.006364	1.1
Uncontrolled_Muscle_Movements								
	663 403		-					
Sleep_Disorder				553				
Obsessive_Compulsive	48			69				
Substance_Abuse	379							2-Moderate
Selfharm_Ideation	70						0.786517	· ·
Tremor_Shakiness	81	17					0.726457	· ·
Attention_Problems	85	14	51	150	0.858586	0.625	0.723404	3-High

The Data – A Single Example Says it All

Semi-structured questionnaires in notes



Variation in How Questionnaires Show up in the Notes



Lessons Learned

- Wide variety between EHR sites
- Structured forms being transferred to unstructured free-text makes NLP more difficult unless done right!
- Annotation Guideline needs to be adaptive to new examples
- Constant communication between the annotators, the Subject Matter Experts, and the Data Scientist is necessary for building a good model
- For safety signals we are looking for rare events, but the fewer mentions of those events make them more challenging to capture; we need more notes to train models using those rare events.

Questions?

