



Tenth virtual meeting of the CIOMS Working Group XIII Defining Intent, and Guiding Harmonization and Ethics Standards for Real-World Data and Real-World Evidence in Regulatory Decision-Making

27 September 2021, Virtual Meeting

Meeting Minutes

Participants

Christelle Anquez-Traxler** (AESGP), Yoshiko Atsuta (Japan Data Center for Hematopoietic Cell Transplantation), Elodie Aubrun (Novartis), Elodie Baumfeld Andre (Roche), John Concato (US FDA), Gracy Crane (Roche), Emese Csóke** (AESGP), Monica da Luz Carvalho Soares (Agência Nacional de Vigilância Sanitária, Brazil), Cynthia de Luise* (Pfizer), Jie Li (US FDA), Wim Goettsch (Utrecht Centre for Pharmaceutical Policy), Sean Hennessy (University of Pennsylvania), Sanna Hill (CIOMS), Alar Irs (State Agency of Medicines, Estonia), Akihiro Ishiguro (Pharmaceuticals and Medical Devices Agency, Japan), Solomon Iyasu (Merck, Merck Sharp & Dohme Corp), Juhaeri Juhaeri (Sanofi), Laurie Lambert (CADTH), Andrea Machlitt (Bayer), Takahiro Nonaka (Pharmaceuticals and Medical Devices Agency, Japan), Kateriina Rannula (CIOMS), Lembit Rägo (CIOMS), David Townend (Maastricht University), Julia Wicherski (Bundesinstitut für Arzneimittel und Medizinprodukte), David Wormser (Novartis), and Kristina Zint (Boehringer Ingelheim).

Regrets

Enrica Alteri (former EMA), Laurent Azoulay (McGill University), Stella Blackburn (IQVIA), Mariette Boerstoeel (Alexion), Thomas Brookland (Roche), Britta Haenisch (Bundesinstitut für Arzneimittel und Medizinprodukte), Steffen Heß (Bundesinstitut für Arzneimittel und Medizinprodukte), Lu Hong (National Medical Products Administration, China), Michele Jonsson Funk (University of North Carolina), Miguel-Angel Mayer (Universitat Pompeu Fabra Barcelona), Mareike Millner (Maastricht University), Daniela Rojas (Maastricht University), Andreas Rudkjoebing (World Medical Association), Anja Schiel (Norwegian Medicines Agency), and Julia Stingl (University of Aachen, Germany).

* New member since last meeting

** Representatives of the Association of the European Self-Care Industry (AESGP), invited to present the findings on work carried out on RWD and RWE.

Introduction

- Lembit welcomed the WG members and chaired the meeting.
- He welcomed the new WG member, Cynthia de Luise, senior pharmacoepidemiologist at Pfizer, who replaces Ulka and will join the chapter 3 team.
- Lembit thanked Juhaeri for his presentation introducing the CIOMS WG XIII work at a virtual conference organized by St. Petersburg 1st Medical University in Russia (16.09.2021). Sanna will upload the presentation slides to the password-protected CIOMS webpage, and WG members are welcome to use them if needed.



- The combined chapters document has been uploaded to Google Docs and is open for contributions. The team members not able to access Google Docs are welcome to continue working using Word documents and email.
- Emese Csőke, Association of the European Self-Care Industry ([AESGP](#)), kindly agreed to join the WG meeting to present the work carried out on RWE: “RWE in support of decision making for OTC medicines”.
- The meeting agenda was adopted.
- Kateriina was rapporteur.

“RWE in support of decision making for OTC medicines”

- Emese gave a presentation, and the following only represents the discussion points.
- Has digital technology, artificial intelligence (AI) and Natural Language Processing (NLP) have been employed to identify the use of over-the-counter (OTC) medicines in electronic health records (EHR) texts?
- There are not enough data points to investigate the use of OTC medicines in the real world as their outcomes are not routinely captured. EHR can be potentially utilised when investigating the prescribed version of the OTC product.
- The article entitled “[How can real-world evidence aid decision making during the life cycle of non-prescription medicines?](#)” was published in the [Clinical and Translational Science Journal](#) in August 2021.
- WG members are welcome to reach out for any additional information.

Progress updates and discussions on chapters

Chapter 1. Introduction

- The introduction will be reviewed in the light of the revised chapters.

Chapter 2. Uses of RWE in the regulatory process during the product life cycle

- The chapter 2 team reviewed the draft to improve flow, improved the figures, revised the chapter introduction, and added a glossary. Some comments remain to be addressed.
- The team encouraged WG members to share their opinions regarding the organisation of the chapter and the level of detail given on some topics.
- To what extent should the chapter balance the information that RWE is providing to HTA payers versus regulators?
- The team feels that the STROBE checklist, among other sections, would be better suited in another chapter and the chapter 2 team invited the WG members to provide feedback.

Chapter 3: Real world data and data sources

- WG members are invited to add text or links to the materials they wish to see incorporated in chapters, as it would make the work process faster and more efficient.
- As the chapter 3 draft focuses too heavily on the US space, team members are invited to suggest information regarding European projects, namely on the points Anja had suggested in the previous meeting:



- European Health Data Space ([EHDS](#)), which is a rapidly developing area;
- [DARWIN EU](#) project;
- Track Database Auditing System (TDAS) initiative;
- Common Health Entry Documents ([CHED](#));
- plus other similar initiatives that will be in place by the time our report is finished.
- Any information or suggestion from Peter Arlett (EMA) in drafting a section on European Health Data Space would be beneficial to the chapter.

Chapter 4: Key scientific considerations in regulatory RWE generation

- There have not been any recent updates to the chapter.
- Michele will reach out to team members individually to check on the timelines regarding adding contributions.

Chapter 5: Ethics, governance, and related issues

- The next chapter 5 team meeting is scheduled for October [post-meeting this was extended to October – November].
- David shared the key points in preparing the first draft:
 - What constitutes compatible processing of secondary use of data?
 - Does RWD pose new ethics questions and what are the challenges and possibilities of using RWD?
 - Should the concept of consent be re-evaluated?
 - Is confidentiality a better solution than relying on privacy as the basis of governance?
 - How to engage people in an ongoing, dynamic dialogue to build trust and confidence and underpin the development and acceptance of RWD?
 - He will also add content in line with research on equity, diversity, and inclusion.
- Considering the presumption towards individualist or autonomy-based ethics underpinning the data protection issues and legal approaches in different jurisdictions, the chapter 5 team will take a forward-looking approach in their discussions and recommendations.
- Solomon shared an HMA-EMA Joint Big Data Taskforce Phase II report: '[Evolving Data-Driven Regulation](#)', which discusses the thinking around the definition of big data and areas related to data preparation, reporting, curation, dissemination as well as on data ethics concerning the use of algorithms, AI, and machine learning.
- [Post-meeting note: Solomon also sent [Benefit-Risk Assessment for New Drug and Biological Products](#).

General discussion

Addressing COVID-19

- The WG discussed whether to regroup all COVID-19 related topics into a separate chapter or subsection.
- CIOMS WGs have taken different approaches towards addressing COVID-19 considerations. Some groups have opted for a separate chapter and others for a more flexible approach.



- As the potential subject area regarding COVID-19 discussions is large, the team could choose certain areas affected by the use of RWE and refer to these in different chapters.
- Although we are still on a journey through the pandemic, some initial experiences and lessons have emerged.
- The team agreed that carefully selected and presented examples would add value to the COVID-19-related discussions.

Glossary

- WG members discussed the need for including a glossary.
- The team agreed to create a short, conservative list of key terms from each chapter but without definitions in the first instance. The WG will then discuss the terms and decide whether to provide definitions and create a separate glossary.
- There is a value to the WG members agreeing definitions for the sake of using terms consistently throughout the report, e.g. in the event of controversies, even if we do not include a glossary in the report.
- The chapter 2 team has already shared its glossary items in the combined chapters document on Google Docs and the WG members are welcome to comment. Elo will add references.
- Juhaeri will add the chapter 3 glossary terms.
- It may be an option to provide some definitions in the introduction, and others within the chapters where they appear most, perhaps via footnotes.
- The [CIOMS Cumulative Pharmacovigilance Glossary](#) is available as a resource when considering creating the glossary.
- Relevant terms can be refined or redefined to specify their meaning in the report's context and objectives. Hyperlinks would be an added value.

Future meetings and closing remarks

- Sanna will send a Doodle poll to help schedule the next meeting for early December.
- The combined chapters document is on Google Docs, and the team agreed to develop the drafts, suggest edits and add comments by the end of October. After this time, the chapter leads will have an opportunity to consider team members' suggestions to mature the chapters and send the chapters back to Sanna by 20 November.
- The WG will have an opportunity to read and reflect on the combined chapters in preparation for the 11th WG meeting in early December.
- The WG discussed the need for holding an in-person meeting in 2022. Sanna will reach out to WG members with a request to explore their organisations' travel policies by the next meeting. There does not seem to be definitive travel policies available yet.
- Lembit thanked all WG members for joining and for their time and effort in progressing the WG's work.