Nineteenth meeting of the CIOMS Working Group XIII: Real-World Data and Real-World Evidence in Regulatory Decision Making

8 April 2024, Geneva, Switzerland

Meeting Minutes

In-person participants
Enrica Alteri (formerly European Medicines Agency), Yoshiko Atsuta (Japan Data Center for Hematopetic Cell Transplantation), John Concato (US Food and Drug Administration), Sean Hennessy (University of Pennsylvania, US), Sanna Hill (CIOMS), Jie Li (US Food and Drug Administration), Juhaeri Juhaeri (Sanofi), Mariya Junji (Pharmaceuticals and Medical Devices Agency, Japan), Laurie Lambert (Canadian Agency for Drugs and Technologies in Health), Monica da Luz Carvalho Soares (Agência Nacional de Vigilância Sanitária, Brazil), Andrea Machlitt (Bayer), Takahiro Nonaka (Osaka Metropolitan University, Japan), Lembit Rägo (CIOMS), Shirley Wang (Harvard Medical School, US), and Julia Wicherski (Bundesinstitut für Arzneimittel und Medizinprodukte, Germany).

Regrets
Elodie Aubrun (Novartis), Laurent Azoulay (McGill University, Canada), Elodie Baumfeld Andre (Roche), Stella Blackburn (formerly IQVIA), Mariette Boerstoel (Bristol-Myers Squibb), Thomas Brookland (Roche), Gracy Crane (Roche), Wim Goettsch (Utrecht Centre for Pharmaceutical Policy, Netherlands), Andres Gomez-Caminero (Merck, Merck Sharp & Dohme Corp), Britta Haenisch (Bundesinstitut für Arzneimittel und Medizinprodukte, Germany), Steffen Heß (Bundesinstitut für Arzneimittel und Medizinprodukte, Germany), Alar Irs (State Agency of Medicines, Estonia), Solomon Iyasu (formerly Merck, Merck Sharp & Dohme Corp), Michele Jonsson Funk (University of North Carolina, US), Lu Hong (National Medical Products Administration, China), Cynthia de Luise (Pfizer), Miguel-Angel Mayer (Universitat Pompeu Fabra Barcelona, Spain), Manami Nomura (Pharmaceuticals and Medical Devices Agency, Japan), Monika Nothacker (Association of the Scientific Medical Societies, Germany), Heather Rubino (Pfizer), Andreas Rudkjoebing (World Medical Association), Anja Schiel (Norwegian Medicines Agency), David Shaw (University of Bern, Switzerland), Julia Stingl (University of Aafchen, Germany), David Townend (University of London, UK), David Wormser (Novartis), and Kristina Zint (Boehringer Ingelheim).

Introduction

- This year, CIOMS will be issuing a 75th anniversary edition of the CIOMS Cumulative Glossary, with a focus on Pharmacovigilance.
- On the 19th of March, CIOMS published its report on Introduction to MedDRA Labeling Grouping (MLG). On the 22nd of April, it had been downloaded 1290 times. No print copies will be made.
WG XIII report discussion

Preface

- The Preface contextualises the report.
- There were no comments from the WG following the two-week review.

Executive Summary

- This provides a concise summary of each of the chapters and was re-written following the report revision.

Introduction

- A sentence was added after the table of definitions:
  
  “These definitions of RWD are largely overlapping and similar in their essence. Given these and other existing definitions of this evolving field, the WG declined to put forth yet another definition.”

Chapter 1: Real-world evidence for decision making during the product lifecycle

- Jenni intends to review the chapter.
- Some Public Consultation comments are good but some are self-promoting, wanting to promote the reviewer’s own organisation. We cannot make edits in line with every comment.

Chapter 2: Sources of real-world data

- The Public Consultation comments mostly centred around categorisation, which can be sliced ‘n’ diced in many ways. Originally, we had traditional vs emerging sources (e.g. social media and imaging). Some changes were made within the traditional category. Previously, we had “existing data sources”, which became “existing health care data sources” (e.g. claims database and EHRs); and we had “data sources with ad hoc data collection”, which became “RWD with primary data collection”.
- Sometimes pragmatic trials (hybrids) can create RWE too. There was a Public Consultation comment about a connection between trials and RWD, and how RWE does not only come from RWD. This is no longer addressed in Chapter 2 but now only in Chapter 3 under the design section. John’s paper is cited.
- On the topic of some Public Consultation comments being self-promoting, some of the common data model projects had to be reduced. More information was provided on FDA Sentinel but we did not provide all the proposed references.

Chapter 3: Real-world evidence for regulation: key considerations

- The definition of confounder was discussed at the Editorial Committee meetings i.e. the classical definition vs the modern epidemiology definition.
- On the topic of some Public Consultation comments being self-promoting, some of the comments were not adopted where e.g. the objective was to introduce a newly published paper.
Chapter 4: Ethics and governance
- It was challenging to achieve a balance between ethics, governance and legal issues, but after re-focusing the chapter on RWE, and after several revisions, Chapter 4 is now in good shape.
- Many expressed a concern that the chapter was too harsh against clinical trials with negative implications on the efficacy-effectiveness gap.
- This chapter received more Public Consultation comments that any other element of the report.

Chapter 5: Conclusions and future directions
- We are not prescriptive but provide options on a wide range of topics.
- Given the fast-moving field, this chapter is about what we can anticipate in the future.
- We could add a section / a few paragraphs or a diagram on what a process of RWD studies or RWE should look like.

Other discussion points
- Links to the case studies have been added throughout the chapters 1-3.
- Regarding Appendix No 3, all WG members are invited to check that their names and organisation names are presented correctly. Any edits need to be emailed to Sanna asap.
- The case study entitled “Evaluating Real-World Performance of Elecsys® Anti-SARS-CoV-2” has been removed due to complexities with the submission. We still have case studies A-H.
- The case study template was re-worked to present the case studies in a more scientific/neutral manner. Those submitting the case studies are recognised under the Acknowledgements section, and only generic names and “sponsor” are provided.

Implementation strategy

Implementation team
- Laurie offered to join to bring in the HTA perspective.
- Andrea offered to volunteer as a replacement member in the webinar and article teams if needed.

Launch
- CIOMS will be publishing the report on its own website and raising awareness via its database e.g. using its quarterly Newsletter and social media channels e.g. LinkedIn.
- All WG members are invited to support the effort using their own communities and communication networks/ channels. CIOMS will provide as much notice time as possible to allow everyone to prepare for a coordinated launch.

Meetings
- [Post-meeting note: the WG XIII report will also be promoted at the ICH Assembly meeting in Fukuoka, Japan on the 4 - 5 June 2024.]
Council for International Organizations of Medical Sciences

- Annual meeting of the International Society for Pharmacoepidemiology (ISPE), August 2024. Juhaeri submitted a proposal for a symposium.
- International Society of Pharmacovigilance (ISoP) 2024 annual meeting, Montreal, Canada, 1-5 October 2024. (At one of the sessions, the CIOMS WG XIII will also be present.)
- [Post-meeting comment: slide sets will be made available for everyone’s awareness raising activities.]

**Webinar**
- We could envisage a one-hour webinar.
- Sean volunteered to work on the webinar.
- The one webinar can be re-used for several fora and/or locations.
- The CIOMS database reaches close to 20,000 people.

**e-Learning modules**
- For reference, the CIOMS report *Drug-Induced Liver Injury* was accompanied by e-learning modules (see [here](#) for more information.) The DILI report e-Learning modules were created by the Uppsala Monitoring Centre as it had more capacity and in-house resources at that time, so that the CIOMS WG contributed the scientific content and the Uppsala Monitoring Centre contributed the logistical the technological resources. The modules were made publically available for not-for-profit institutions.

**Scientific article for an open access journal**
- Juhaeri, Sean and Yoshiko volunteered for drafting an article.

**Online presence**
- There was a suggestion to encourage third-parties to host the report on their websites such as regulators, HTA agencies, RWE4Decisions, GetReal, International symposiums e.g. HTAi, and INAHTA.

**Approval for publication**
- The WG members at the meeting approved the report for publication, and others, e.g. Michele, approved the report via email while in absence.

**Next steps**
- The Editorial Committee will meet later in the week to finalise the report.
- A graphic design agency will lay out the content.
- Electronic publication is expected for late May or very early June.
- We will coordinate the electronic publication among the WG members for maximum impact.
- The electronic report will be free of charge as a public good.
• The print version will be free of charge but people are asked to pay for postage and packaging.
• It was agreed to print 300 copies.

Any other business

• Lembit thanked all the WG members for their work especially during the pandemic, regretting having had only one in-person meeting.
• We anticipate the report to be highly valued. Many need a how-to manual and we expect a lot of interest on our work.