Session 4: Real World Evidence – Qualification of data sources

The Cystic Fibrosis experience

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JUSTUS-LIEBIG-UNIVERSITÄT GIESSEN

EMA workshop, 18 April 2023

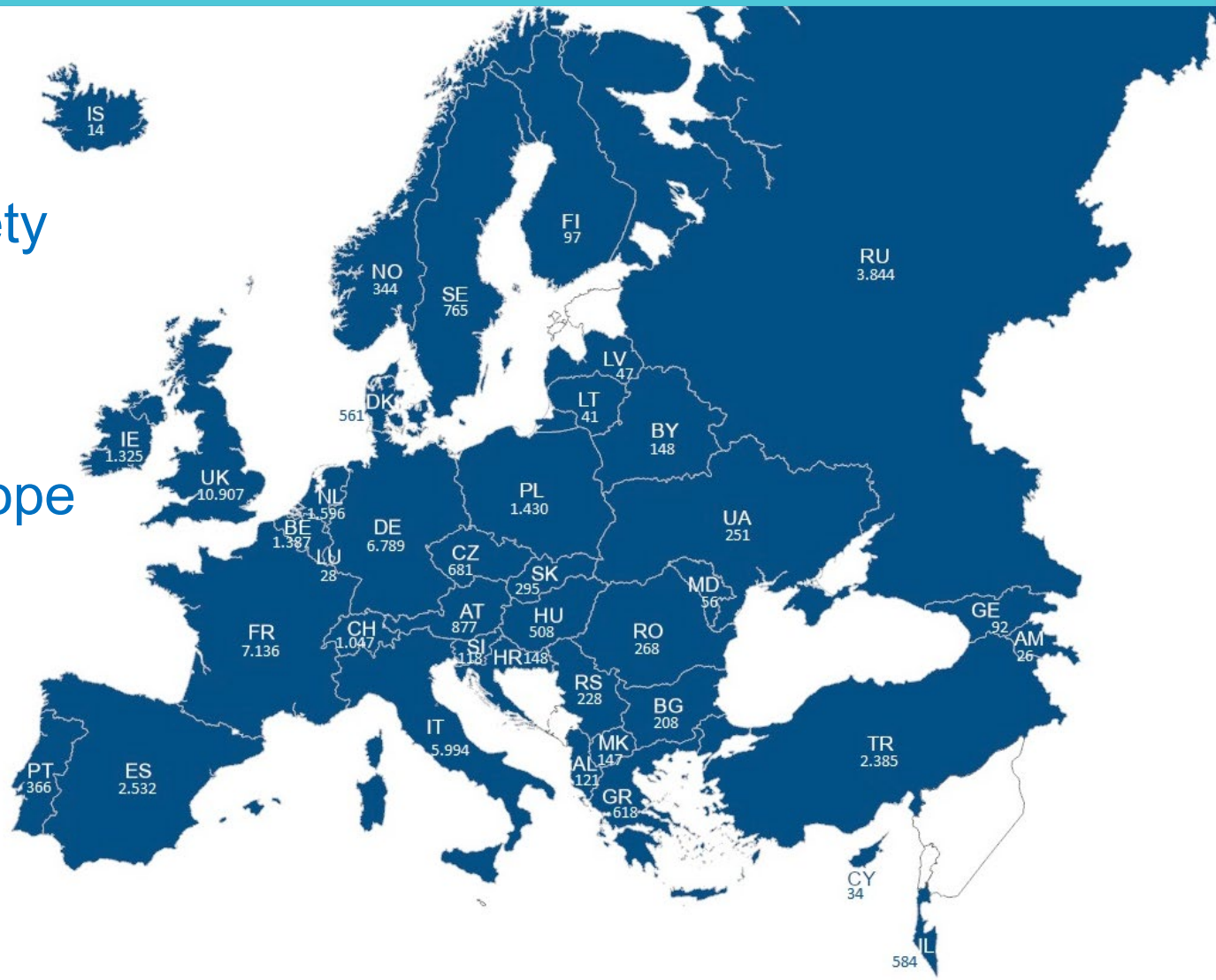
European Cystic Fibrosis Society Patient Registry

Holder: European Cystic Fibrosis Society

Founded: 2003

To collect data and compare CF in Europe
(definition: WHO region)

Stakeholders:
Clinicians, Patient, Researchers,
Health Authorities



European Cystic Fibrosis Society Patient Registry

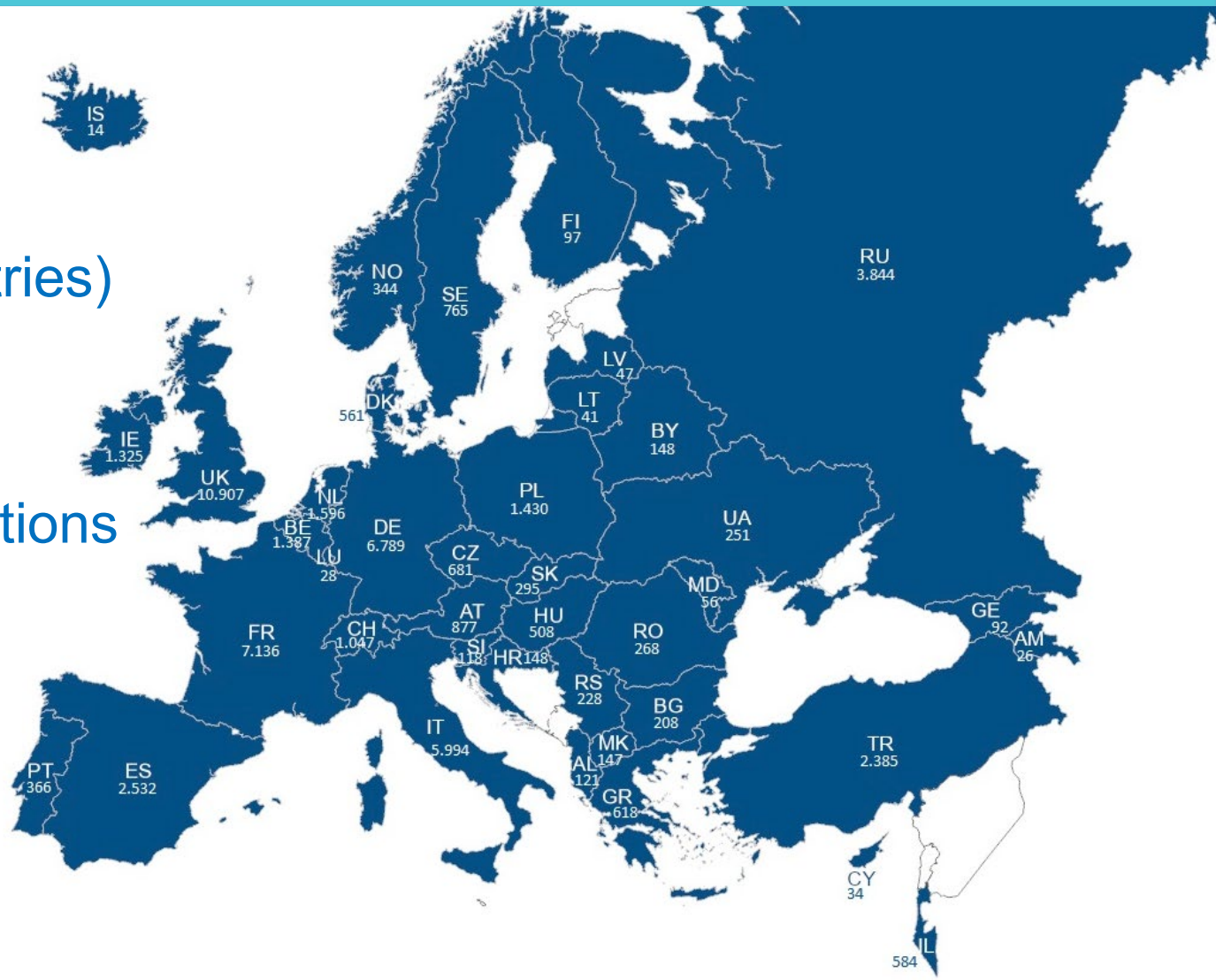
2021:

54.043 patients

from **40 countries** (17 National Registries)

Output:

Annual Data reports, Scientific publications



European Cystic Fibrosis Society Patient Registry

KEY`s TO SUCCESS:

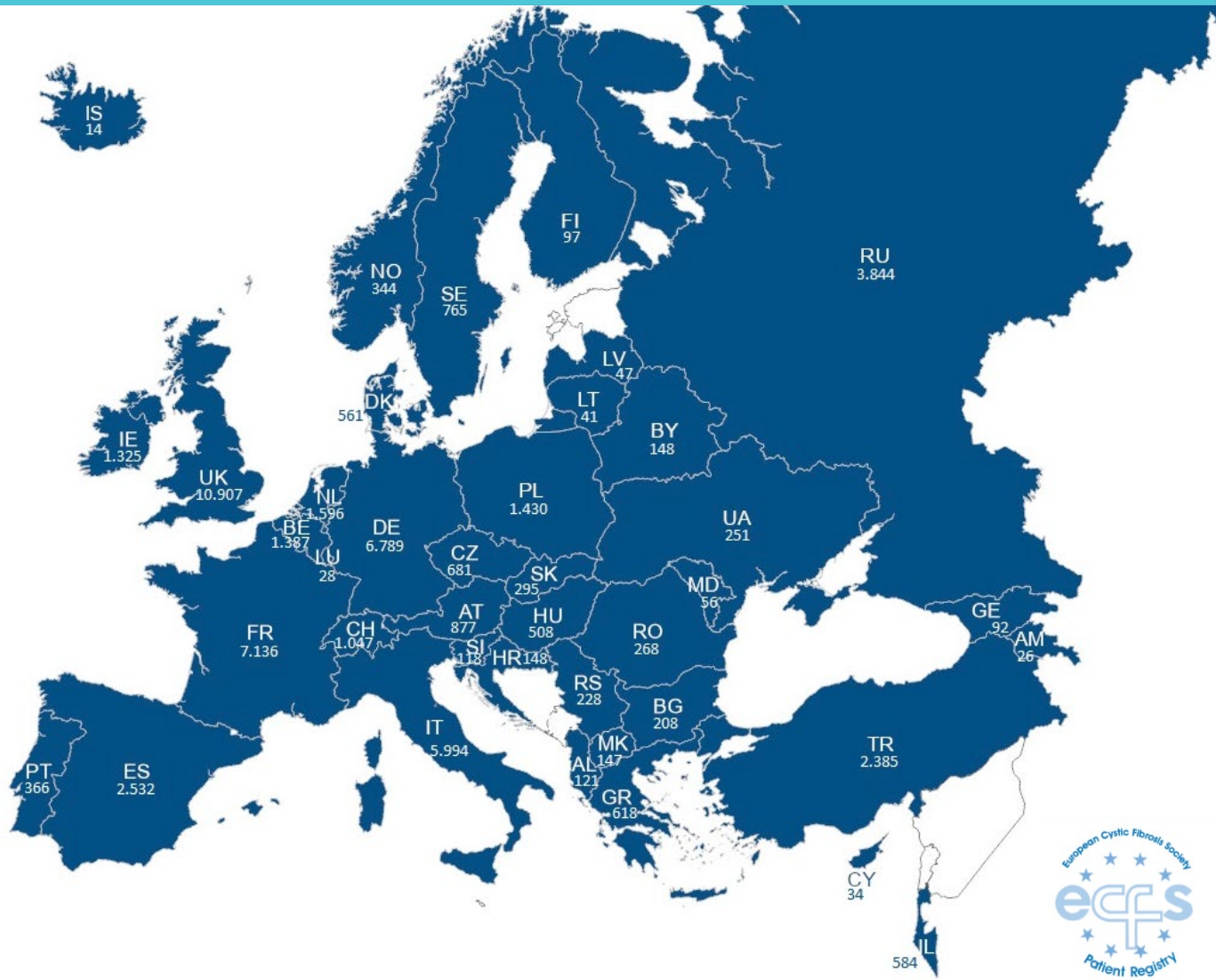
HARMONISED

Dataset, Quality Control, Governance, GDPR

SUSTAINABLE

TRANSPARENT

INDEPENDENT



ECFSPR - Pharmacovigilance

2016 Start discussions with European Medicine Agency
-> ECFSPR as model for other rare diseases

EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

2017 Workshop on CF registries
(www.ema.europa.eu/en/documents/report/report-cystic-fibrosis-registries_en.pdf)

2018 **Qualified by EMA** as an appropriate data-source for post-authorisation safety (PASS) and efficacy studies (PAES) of new therapies
(www.ema.europa.eu/en/documents/regulatory-procedural-guideline/qualification-opinion-european-cystic-fibrosis-society-patient-registry-ecfspr-cf-pharmaco_en.pdf)

2019 First application for a pharmacovigilance study (EUPAS43022)

Pre Qualification Process

Workshop with MAH, EMA, Patient representatives and Registry holder:

- GOVERNANCE
- INFORMED CONSENT, DATA PROTECTION AND DATA SHARING
- PROCESS FOR DATA UPLOAD
- DATA ELEMENTS
- DATA QUALITY

Pre Qualification process - Topics

- GOVERNANCE
  - Communication to public, MAH and Regulators
  - Central contact point for Europe
- INFORMED CONSENTS, DATA PROTECTION AND DATA SHARING
  - Informed consent (Secondary use of registry data (GDPR) vs. separate informed consent)
  - Aggregated data vs raw data
- DATA QUALITY
  - Agreed set of data quality indicators (completeness and accuracy)
  - Source data verification
- DATA ELEMENTS
  - Registry description
  - **Annual dataset** vs encounter dataset
  - **Disease specific complications** vs all complications/all AE
  - **Disease specific medications** vs all medications

Pre Qualification process - Suggestions

- Triangle discussion between MAH, EMA, Registry (including Patients) is critical!
  - Clarification of limitation`s and challenge`s
  - Governance
  - Data quality
- Guidelines on registry based studies
- Checklist REQueST TOOL

Qualification process – Experience

- Framework needed to be established from scratch
- Process:
  - Clear, strict, direct and good communication
- Timeline:
  - Challenging for a large consortium like the ECFSPR
- Structure:
  - Questions and background information
- Issues:
  - Short timelines

Qualification process – Experience

- Framework needed to be established from scratch
- Process:
  Clear, strict, direct and good communication
- Timeline:
  Challenging for a large consortium like the ECFSPR
- Structure:
  Questions and background information
  –> ***Structured description***
- Issues:
  Short timelines –> ***need for a Clock-stop***

Qualification process – ECFSPR Experience

- Reputation inside the ECFS and outside
- Commitment to work on EMA`s requirements
- Resources to close the gap between commitment and demands
  - Keep the balance between core business/commitment and PMV-studies
- PMV requests:
  - Drug utilization of an Orphan drug over 40 countries (EUPAS43022) (2020-2024)
  - PAES for an Orphan drug and a specific age group including 11 countries (2020-2024)

Post Qualification process – Experience

- Triangle discussions is lacking –> ***active role of EMA***
  - MAH – EMA
  - Indirect involvement of the Registry
- Follow up by the EMA
  - Indirect feedback –> ***direct feedback on methodology***
  - Regular updates
- Transparency of impact and uptake of a methode is difficult –> ***ENCePP***
  - Confidentiality
  - PMV study period
- Reconfirmation / Requalification –> ***continuous dialogue***

Conclusion – The CF experience

The Qualification Opinion was a challenge and a milestone:

- ✓ Different aims /perspectives / “languages“
- ✓ Balance between quality and quantity of data
- ✓ Balance between resources and demands
- ✓ Balance between commitment and professionalising
- ➢ Continuous adjustment and enhancement of the Registry
- ➢ Continuous dialogue with MAH and EMA