

A Process for the Emulation of Comparative Oncology Trials with Real-world Evidence (ENCORE)

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Abstract

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Background

Randomized controlled trials (RCTs) have been the gold standard for establishing the efficacy and safety of medical products. With the advent of the the 21st Century Cures Act directive¹, the Food and Drug Administration (FDA) established a framework to increasingly include and consider real-world evidence (RWE) generated from routine-care health data such as electronic health records (EHR) to evaluate and contextualize the comparative safety and effectiveness of novel cancer therapies.² With 21% of all approvals, oncology was the disease area with the most FDA drug approvals in 2023,³ and especially in the field of precision oncology, RWE has a large potential to complement evidence coming from RCTs. Potential use cases comprise the assessment of effectiveness in patient populations that are underrepresented in RCTs, the construction of external control arms in single-arm trials where active recruitment may not be feasible or the use of real-world data (RWD) for biomarker discovery and label extensions among pan-tumor populations that harbor specific genomic and immuno-pathological signatures.

However, the validity and transportability of results derived between RWE studies and RCTs can depend on many factors and frequently referenced limitations include missing data, small sample sizes, data discontinuity^{4, 5}, rapid changes in guideline treatment patterns and the inability to measure and emulate common eligibility criteria and prognostic factors in RWD.⁶ While there are already published examples of oncology trial emulations⁶⁻⁸, a systematic and scaled approach to emulate a diverse set of different oncology trials in various heterogeneous databases is necessary to gain confidence in the accuracy of RWE studies and to provide an answer as to which questions can be validly answered with which non-interventional study designs and analysis methods.

The RCT DUPLICATE initiative⁹ increased our understanding of when RWE studies can come to causal conclusions on treatment effects by comparing results against RCTs under the assumption that each RCT finding reflects a causal treatment effect. In settings where the RCT designs could be emulated well, RWE studies came to the same conclusions.¹⁰ However, prior work from RCT-DUPLICATE has focused primarily on emulating trials in the cardio-metabolic, renal, and pulmonary clinical areas using claims databases.

The *Emulation of Comparative Oncology Trials with Real-world Evidence* (**ENCORE**) project¹¹ aims to extend this work to the field of oncology which comes with its own unique set of challenges which must be systematically explored and understood. Building on a process co-developed with the FDA through RCT DUPLICATE⁹, this expansion to oncology is going to emulate 12 randomized clinical trials using multiple EHR data sources. The process includes an emphasis on transparency with documented assessment of data fitness of the RWD source for each trial^{12, 13} and conducting extensive sensitivity analyses to assess robustness of findings and trial eligibility criteria.

The objectives of this project are to develop state-of-the-art methodological approaches and apply these to create insights that may provide guidance on the potential use of RWE for

regulatory science in oncology. This includes the systematic evaluation of the suitability of data in relation to the study design and statistical analysis by emulating 12 oncology trials across four cancers and assessing the agreement of treatment effect estimates between RCTs and their respective emulations.

In this process paper, we describe the design and process for the selection of the 12 oncology RCTs, the assessment of the database quality and selection, protocol development, study design and statistical analysis and final agreement metrics to evaluate the concordance between RCTs and emulations.

Methods

A visual summary of the entire systematic process from trial selection to final results is provided in Figure 1.

Trial selection

The focus of ENCORE is to maximize potential learnings on when RWE studies can or cannot yield similar results compared to RCTs. To that end, the focus of the project is on trials of therapies for the most common cancers and/or cancers for which there has been substantial therapeutic development in recent years. After careful review exchange with clinical and regulatory experts, four cancer indications were identified including lung cancer, breast cancer, colorectal cancer and multiple myeloma. For each cancer we aim to conduct three trial emulations which will be implemented using multiple databases which will be accessible for the scope of this project (i.e. the total number of emulations will equal 12 trials x n databases which are found fit-for-purpose for each trial).

The trial selection will follow a semi-automated process for which we will document the eligibility criteria and decisions, resulting in a CONSORT diagram showing reasons for excluding RCTs. The search will be conducted using the AACT database which is a publicly available relational database developed and maintained by the Clinical Trials Transformation Initiative (CTTI) which contains all information (protocol and result data elements) about every study registered in ClinicalTrials.gov.¹⁴ To identify eligible trials, we will use a combined search query strategy of the National Library of Medicine (NLM)-controlled *MeSH* term and a free keyword search for the respective cancer indication in the *conditions*, *studies* and *detailed_descriptions* fields of each trial entry on ClinicalTrials.gov.

Eligible trials need to fulfill the following basic criteria:

- Interventional
- Randomized
- Intervention model: parallel assignment
- Industry-sponsored
- Trial start in 2011 or later
- Primary purpose was to study treatment effects
- Primary or secondary endpoint must be overall survival
- Recruitment status: 'Completed' or 'Active, not recruiting'
- Feasibility and clinical relevance

The rationale and operationalization of each criterion is listed in detail in Table 1. While all but the last criteria are highly objective and can be used to filter potential trials in an automated fashion, the last criterion on emulation feasibility and clinical relevance involves extensive human review, a thorough feasibility assessment in context of available databases and discussion with clinical and regulatory experts. The aim is to identify a broad and diverse set of potentially feasible RCTs for which there is reasonable believe that key study parameters can be emulated and there is a high enough clinical relevance for regulatory decision-making (e.g., paradigm-changing trials).

Databases

Protocol development

Application of the target trial emulation framework to study design and statistical analysis

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Agreement metrics

Discussion

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Conclusions

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References

1. Framework for FDA’s real-world evidence program (last accessed 11/28/2024) [Internet], 2018 Available from: <https://www.fda.gov/media/120060/download?attachment>
2. Purpura CA, Garry EM, Honig N, et al: The role of real-world evidence in FDA-approved new drug and biologics license applications. *Clinical Pharmacology & Therapeutics* 111:135–144, 2022
3. Senior M: Fresh from the biotech pipeline: Record-breaking FDA approvals. *Nature Biotechnology*, 2024
4. Merola D, Schneeweiss S, Schrag D, et al: An algorithm to predict data completeness in oncology electronic medical records for comparative effectiveness research [Internet]. *Annals of Epidemiology* 76:143–149, 2022 Available from: <http://dx.doi.org/10.1016/j.annepidem.2022.07.007>
5. Joshua Lin K, Jin Y, Gagne J, et al: Longitudinal data discontinuity in electronic health records and consequences for medication effectiveness studies. *Clinical Pharmacology & Therapeutics* 111:243–251, 2022
6. Rider JR, Wasserman A, Slipski L, et al: Emulations of oncology trials using real-world data: A systematic literature review. *American journal of epidemiology* kwae346, 2024
7. Merola D, Campbell U, Gautam N, et al: The action coalition to advance real-world evidence through randomized controlled trial emulation initiative: oncology. *Clinical Pharmacology & Therapeutics* 113:1217–1222, 2023
8. Merola D, Campbell U, Lenis D, et al: Calibrating observational health record data against a randomized trial. *JAMA Network Open* 7:e2436535–e2436535, 2024
9. Wang SV, Schneeweiss S, Franklin JM, et al: [Emulation of randomized clinical trials with nonrandomized database analyses: Results of 32 clinical trials](#). *Jama* 329:1376–1385, 2023
10. Heyard R, Held L, Schneeweiss S, et al: Design differences and variation in results between randomised trials and non-randomised emulations: Meta-analysis of RCT-DUPLICATE data [Internet]. *BMJ medicine* 3, 2024 Available from: <https://doi.org/10.1136/bmjmed-2023-000709>
11. Calibrating real-world evidence studies in oncology against randomized trials: ENCORE (last accessed 11/28/2024) [Internet], 2024 Available from: <https://www.fda.gov/about-fda/oncology-center-excellence/calibrating-real-world-evidence-studies-oncology-against->

- 12.** Rivera DR, Eckert JC, Rodriguez-Watson C, et al: The oncology QCARD initiative: Fostering efficient evaluation of initial real-world data proposals. *Pharmacoepidemiology and Drug Safety* 33:e5818, 2024
- 13.** Gatto NM, Campbell UB, Rubinstein E, et al: The structured process to identify fit-for-purpose data: A data feasibility assessment framework. *Clinical Pharmacology & Therapeutics* 111:122–134, 2022
- 14.** Tasneem A, Aberle L, Ananth H, et al: The database for aggregate analysis of ClinicalTrials. Gov (AACT) and subsequent regrouping by clinical specialty. *PloS one* 7:e33677, 2012
- 15.** Weberpals J, Raman SR, Shaw PA, et al: A principled approach to characterize and analyze partially observed confounder data from electronic health records [Internet]. *Clinical Epidemiology* 16:329–343, 2024 Available from: <https://www.tandfonline.com/doi/abs/10.2147/CLEP.S436131>

Tables

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Table 1: Criteria to select eligible trials for emulation in ENCORE.

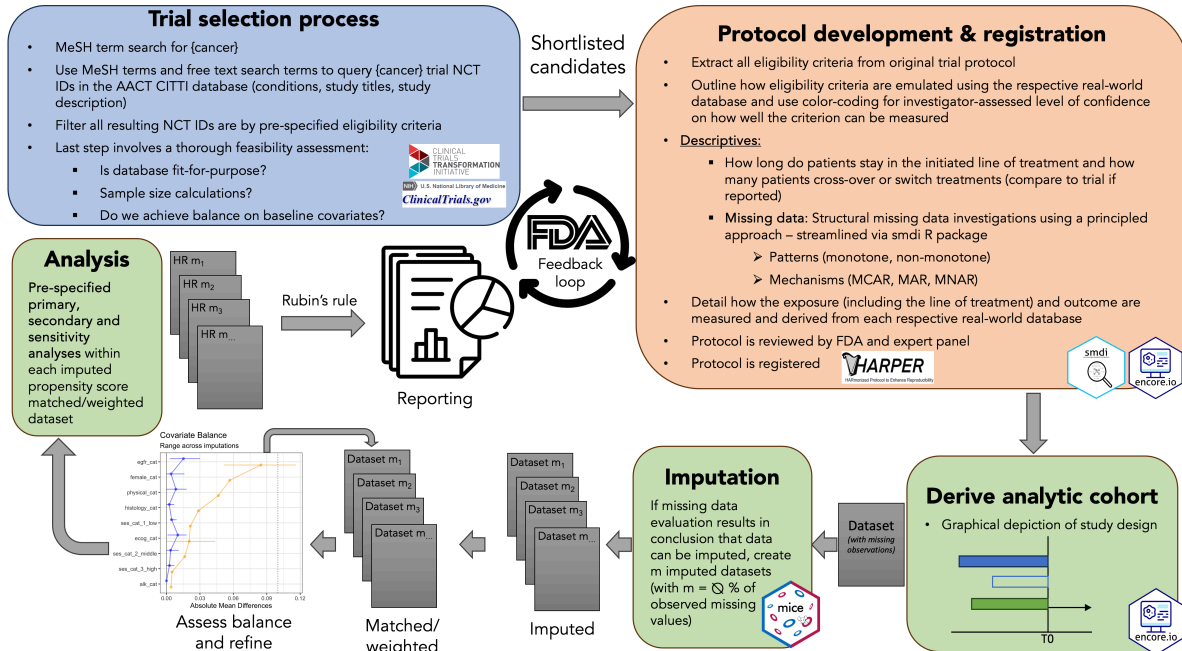
Criteria	Definition	Eligible
Interventional study	The nature of the investigation or investigational use for which clinical study information is being submitted	Interventional (clinical trial): Participants are assigned prospectively to an intervention or interventions according to a protocol to evaluate the effect of the intervention(s) on biomedical or other health related outcomes.
Randomized allocation	The method by which participants are assigned to arms in a clinical trial.	Randomized: Participants are assigned to intervention groups by chance
Interventional study model	The strategy for assigning interventions to participants.	Parallel: Participants are assigned to one of two or more groups in parallel for the duration of the study
Sponsor/source	The entity (for example, corporation or agency) that initiates the study	Industry
Study start date	The estimated date on which the clinical study will be open for recruitment of participants, or the actual date on which the first participant was enrolled.	2011 or later
Primary purpose	The main objective of the intervention(s) being evaluated by the clinical trial.	Treatment: One or more interventions are being evaluated for treating a disease, syndrome, or condition.
Primary outcome	A description of each primary outcome measure (or for observational studies, specific key measurement[s] or observation[s] used to describe patterns of diseases or traits or associations with exposures, risk factors or treatment).	Primary or secondary outcome needs to include overall survival
Overall Recruitment Status	The recruitment status for the clinical study as a whole, based upon the status of the individual sites. If at least one facility in a multi-site clinical study has an Individual Site Status of "Recruiting," then the Overall Recruitment Status for the study must be "Recruiting."	Completed: The study has concluded normally; participants are no longer receiving an intervention or being examined (that is, last participant's last visit has occurred) OR Active, not recruiting: Study is continuing, meaning participants are receiving an intervention or being examined, but new participants are not currently being recruited or enrolled
Feasibility and clinical relevance	Are all key variables available to emulate the clinical trial at hand and is the clinical trial considered clinically relevant?	Trials for which there is reasonable believe that key study parameters can be emulated and there is a high enough clinical relevance (e.g., paradigm-changing trials)

Table 2: Tentative list of randomized controlled trials (RCTs) considered for emulation.

NCTID	Acronym	Clinical setting	Line of therapy	Treatment comparison
Non-small cell lung cancer				
NCT02296125	FLAURA	Advanced/metastatic EGFRm+	1L	osimertinib versus erlotinib or gefitinib
NCT01673867	CheckMate057	Metastatic non-squamous	2L	nivolumab versus docetaxel
NCT03215706	CheckMate9LA	Metastatic	1L	nivolumab, ipilimumab, chemotherapy versus chemotherapy alone
Breast cancer				
NCT01740427	PALOMA-2	Advanced postmenopausal ER-positive and HER2-negative	1L	palbociclib, letrozole versus letrozole
NCT02819518	KEYNOTE-355	Locally recurrent inoperable or metastatic triple negative	1L	pembrolizumab, chemotherapy vs. placebo, chemotherapy
NCT01772472	KATHERINE	HER2-positive	Adjuvant	trastuzumab emtansine versus trastuzumab
Colorectal cancer				
NCT04737187	SUNLIGHT	Refractory metastatic	3L	trifluridine, tipiracil, bevacizumab versus trifluridine, tipiracil
NCT01374425	MAVERICC	Metastatic	1L	bevacizumab, mFOLFOX6 versus bevacizumab, FOLFIRI
NCT02563002	KEYNOTE-177	Metastatic microsatellite instability-high (MSI-H) or mismatch repair deficient (dMMR)	2L+	pembrolizumab versus standard of care
Multiple Myeloma				
NCT01568866	ENDEAVOR	Relapsing or progressing disease	2L/3L	carfilzomib, dexamethasone versus bortezomib, dexamethasone
NCT02252172	MAIA	Newly diagnosed	1L	daratumumab, lenalidomide, dexamethasone versus lenalidomide, dexamethasone
NCT01239797	ELOQUENT - 2	Relapsed or refractory	2L+	elotuzumab, lenalidomide, dexamethasone versus lenalidomide, dexamethasone

Figures

Figure 1: Systematic process to understand effectiveness claims of oncology trials using real-world evidence.



[View figure in higher resolution here](#)