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 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 discovery of biomarkers among pan-tumor populations that harbor specific genomic and immuno-pathological signatures.

However, the validity and transportability of results derived betwen RWE studies and RCTs can depend on many factors and frequently referenced limitations include missing data, small sample sizes, data discontinuity4, 5, rapid changes in guideline treatment patterns and the inability to measure and emulate common eligibility criteria and prognostic factors in real-world data (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.

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 trial12, 13 and the conduct of 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](#fig-process).

## 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 emphasis 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 and 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 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 resulting in a CONSORT diagram showing reasons for excluding RCTs. The search will be conducted using the AACT database which is s 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 on 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
* Overall survival must be one of the endpoints reported
* 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](#tbl-criteria). We will mainly consider pivotal interventional, randomized trials after 2011 since many cancer indications have witnessed significant changes in treatment guidelines in recent years and due to the usually rapid adoption of new breakthrough therapies in routine care, it is unlikely to find patients who may be still treated with outdated treatment regimens in the real-world. In parallel, trials readout should have also not occurred too recently in order to allow for enough data and follow-up time accrual in databases used for this project. We further focus only on trials that have reported overall survival (OS) as one pre-specified endpoint in the protocol. Although there have been substantial methodological advancements to increase our understanding on the emulation and comparison of real-world progression-free survival (PFS) and objective response rates (ORR) to a RECISTv1.115-based PFS and ORR assessment in RCTs16, 17, imaging-based evaluations still hold a level of granularity which may not be necessarily reflected in chart-abstracted assessments of a patient’s progression in routine care.18, 19 Given the large number of other methodological challenges like missing data, small sample sizes, data discontinuity and rapidly changing guideline treatments, the scope of this project was to focus on the emulation of OS as the endpoint of interest.

While most trial-eligibility criteria can be operationalized in an automated fashion, the last criterion on emulation feasibility and clinical relevance involves extensive human review. The critical points considered in this step include a thorough feasibility assessment of the data fitness, sample size considerations and the assessment if critical eligibility criteria (e.g., biomarker status) and prognostic factors (e.g., ECOG performance score) are measurable and can be balanced using propensity score matching or weighting methods.20

A list of tentative, shortlisted candidates is presented in [Table 2](#tbl-rcts) and the corresponding selection process is illustrated in the CONSORT diagrams (Supplementary Figures 1-4). Naturally, the majority trials will cover advanced or metastatic cancer populations since a large proportion of drug development efforts have focused on these settings in recent years. A key learning that we aim to foster with the shortlisted trials is to achieve a better understanding how different disease settings (early, late), line settings ([neo]adjuvant, first line, advanced lines of therapy), therapy protocols (monotherapy, combination therapy) and population characteristics (simple versus complex gene/biomarker signatures) can be emulated using RWD. If ongoing feasibility assessments indicate that these trials cannot be emulated with high enough confidence, runner-up will be considered instead.

## 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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# Tables

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

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

# Figures

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

[View figure in higher resolution here](https://github.com/janickweberpals/encore-process-manuscript/blob/main/figures/process.png)