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U.S. FOOD AND DRUG ADMINISTRATION  
CENTER FOR DRUG EVALUATION AND RESEARCH  
AND  
JOHNS HOPKINS UNIVERSITY CERSI WORKSHOP  
  
Addressing Challenges in the Design and  
Analysis of Rare Disease Clinical Trials:  
Considerations and Tools

Day 1

Tuesday, May 2, 2023  
9:00 a.m. to 12:02 p.m.

1 **Meeting Roster**

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14    **Ramona Walls, PhD**

15    Executive Director of Data Science, Critical Path  
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18    **Scott Winiecki, MD**

19    Team Lead, Rare Diseases Team, DRDMG, ORPURN, OND,  
20    CDER, FDA

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P R O C E E D I N G S

(9:00 a.m.)

**Welcome**

DR. LEE: Hello. My name is Dr. Kerry Jo Lee, and I am the Associate Director for Rare Diseases in the Office of New Drugs, Center for Drug Evaluation and Research, or CDER, and lead of the Rare Diseases Team, which manages CDER's Accelerating Rare disease Cures or ARC program.

I am very happy to welcome you to this FDA CDER and Johns Hopkins University Center of Excellence in Regulatory Science and Innovation Workshop, entitled Addressing Challenges in the Design and Analysis of Rare Disease Clinical Trials: Considerations and Tools.

This workshop is one of several events under the umbrella of CDER's ARC program, which in its first year is focusing on engagement with stakeholders, both to better understand their challenges in designing and conducting clinical trials in rare diseases, as well as to inform and share FDA's current thinking on regulatory

1 considerations regarding these trials.

2 I am personally very excited about the  
3 program we have put together for you over the next  
4 few days. There remains a tremendous unmet need  
5 for approved therapies for rare diseases that  
6 affect between 25 and 30 million Americans. That  
7 means about 1 in 10 Americans have a rare disease.  
8 And while collectively this is not a small number  
9 of people, when it comes to developing therapies in  
10 very small populations, there remain a number of  
11 common challenges that's imperative that we remain  
12 thoughtful about the collection, use, and analysis  
13 of the data that we receive because in small  
14 populations, every patient's experience is critical  
15 to both informing trial design, as well as  
16 demonstrating a potential therapy's effectiveness.

17 This workshop will share experiences, best  
18 practices, and the regulatory perspective on how to  
19 collect high-quality and fit-for-purpose data for  
20 rare disease clinical trials; the use of data  
21 sources to inform rare disease drug development;  
22 and design and analysis methodologies for use in

1 rare disease clinical trials. My hope is that you  
2 will take away something from today's program that  
3 will better help you to advance your own work in  
4 developing safe and effective therapies for rare  
5 disease patient populations.

6 Without further ado, I am going to turn this  
7 over to the first session moderated by Dr. Scott  
8 Winiecki. Dr. Winiecki is currently a team lead on  
9 the Rare Diseases Team. He is an experienced  
10 pediatrician who trained at the Children's Hospital  
11 of Philadelphia. He has been with the FDA since  
12 2011, with experience both as a reviewer in the  
13 Center for Biologics Evaluation and Research, as  
14 well as CDER's Professional Affairs and  
15 Stakeholders Engagement staff, where he led the  
16 Safe Use Initiative to reduce preventable harm for  
17 medications through extramural research.

18 Dr. Winiecki, I turn it over to you.

19 **Session 1 - Scott Winiecki**

20 DR. WINIECKI: Thank you, Dr. Lee.

21 Our first session is about how to collect  
22 high-quality and fit-for-purpose data. We live in



1 an age where many rare disease advocacy groups have  
2 started to collect data via natural history studies  
3 or registries, and without question, this data is  
4 crucially important in the context of rare disease  
5 drug development. However, this data needs to be  
6 collected and organized in a way so that it can be  
7 most useful for understanding rare diseases, for  
8 structuring clinical trials, and for regulatory  
9 submission.

10 This is what our first session is all about.  
11 We're going to have three talks today in this  
12 session, all covering data collection and data  
13 organization. I'd like to remind everybody that  
14 during the panel session, we will be answering  
15 questions, some that were submitted when you  
16 registered, and others, if you think of them as the  
17 talks are going on today, please enter them in the  
18 Q&A box, and we will cover as many topics as time  
19 allows in the panel session.

20 Now, I'd like to introduce our first  
21 speaker, Dr. John Concato. He is the Associate  
22 Director for Real-World Evidence Analytics in the

1 Office of Medical Policy. Dr. Concato joined FDA  
2 after a 27-year career at the Yale University  
3 School of Medicine, as well as the U.S. Department  
4 of Veterans Affairs. At FDA, his responsibilities  
5 include a focus on FDA's real-world evidence  
6 program and include looking at internal agency  
7 processes; external stakeholder interactions;  
8 demonstration products; as well as guidance  
9 development. He also serves as the chair of CDER's  
10 Real-World Evidence Subcommittee.

11 Today he's going to speak on Regulatory  
12 Perspectives on Real-World Data, and his talk will  
13 highlight several FDA guidances, which reflect  
14 FDA's current thinking on real-world data and  
15 real-world evidence.

16 Dr. Concato?

17 **Presentation - John Concato**

18 DR. CONCATO: Thank you, Scott and, thank  
19 you Kerry Jo, and thanks for inviting me to this  
20 program. I'll be talking, as mentioned, on  
21 regulatory perspectives regarding real--world data.  
22 Next, please. The views and opinions are my own

1 and should not be attributed to FDA's official  
2 policy. I do not have any conflicts of interest to  
3 report, and if I mention a commercial product, it's  
4 not an actual or implied endorsement. Next.

5 Just to give you a sense of the flow of this  
6 presentation, I'll first start with a bit on  
7 historical context, leading to the current use of  
8 the terms "real-world data" and "real-world  
9 evidence." I'll spend most of my time describing  
10 the main components of FDA's real-world evidence  
11 program, emphasizing guidance development, and then  
12 I'll close with a few slides on challenges and  
13 potential contributions of using real-world data  
14 and real-world evidence in general, as well as for  
15 rare disease. Next, please.

16 Just to start, these definitions of  
17 real-world data and real-world evidence come from  
18 our 2018 framework. On the left, we see that  
19 real-world data are data related to patient health  
20 status or delivery of healthcare, routinely  
21 collected from a variety of sources. So for a very  
22 simple definition, you think of electronic health

1 records, medical claims data, data from registries,  
2 et cetera.

3 On the right, real-world evidence is  
4 evidence derived from the analysis of real-world  
5 data; again, a simple definition. Importantly, in  
6 the lower-right corner of the slide, often  
7 overlooked, various study designs can generate  
8 real-world evidence, including randomized trials in  
9 certain circumstances, but certainly  
10 externally-controlled trials and observational  
11 studies perhaps come to mind first.

12 Here's a bit of historical context outside  
13 of drug development per se. Let's think of the  
14 term "Big Data." That first appeared in the  
15 computer science literature, actually, during the  
16 1990s and initially referred to data just too large  
17 to be stored in, then, conventional storage  
18 systems. If we fast-forward -- it's already more  
19 than a decade ago but -- into the 21st century, big  
20 data represents, quote, "shorthand for advancing  
21 trends in technology that open the door to a new  
22 approach to understanding the world and making

1 decisions," close quote.

2           So one perspective is that as modern  
3 technology has advanced, we have increased quantity  
4 and forms of available data, as well as,  
5 importantly, the speed to merge and manipulate the  
6 data. But we should remember that integration and  
7 analysis of large-scale data has always been  
8 integral to epidemiology and drug development  
9 science. Next, please.

10           Here we encountered the 21st Century Cures  
11 Act of 2016, where FDA was mandated by Congress to  
12 establish a program to evaluate the potential use  
13 of real-world evidence to support a new indication  
14 for a drug already approved or to satisfy  
15 post-approval study requirements. That same  
16 framework I mentioned was issued in December of  
17 2018, and we followed up with draft guidance for  
18 industry in late 2021 and thereafter.

19           I think it's important to emphasize that our  
20 standard for substantial evidence remains  
21 unchanged; that is whether evidence comes from a  
22 trial, a traditional randomized trial, or a

1 so-called real-world evidence study. And we don't  
2 have time today, but commitments were met under the  
3 Prescription Drug User Fee Act VI, and we're on our  
4 way with PDUFA VII. Next, please.

5 That 21st Century Cures Act is perhaps an  
6 inflection point regarding the use of the term  
7 "real-world evidence." It actually is a  
8 nonspecific modifier. Real-world data and real-  
9 world evidence appeared in the medical literature  
10 as of the 1970s or earlier, but in various  
11 unrelated contexts. The contemporary usage,  
12 however, now has specific regulatory implications.  
13 So one way to look at the situation is older  
14 epidemiologic terms were just fine, but the  
15 emergence of big data that I described, as well as  
16 the enactment of the 21st Century Cures Act, has  
17 led to where we are now, that is actually sometimes  
18 confusing use of different taxonomies or  
19 descriptions of study design.

20 The main point I want to make right  
21 now -- and I'll circle back to this later -- is  
22 when you hear RWE study, that's not synonymous with

1 observational study. You really need to know  
2 additional details to understand what study design  
3 is being used or described. Next, please.

4           So here's where I pivot to FDA's real-world  
5 evidence program after that general background. I  
6 want to emphasize this applies to the Center for  
7 Drug Evaluation and Research and Biologics  
8 Evaluation and Research, as well as the Oncology  
9 Center of Excellence, for drugs and biologics, that  
10 is, across the board. We get along quite well, and  
11 we collaborate with our Center for Devices and  
12 Radiological Health and other centers, but they  
13 have their own regulations, and therefore, they  
14 have their own guidance on real-world evidence.  
15 The drug and biologic programs can be described  
16 informally in four categories: internal agency  
17 processes; external stakeholder engagement;  
18 research AKA "demonstration" projects; and guidance  
19 development, and the next series of slides will  
20 walk through these four categories. Next, please.

21           Actually, the first and second categories  
22 are on one slide. I just want to highlight the

1 Real-World Evidence Subcommittee and its role in  
2 supporting internal activities. The membership of  
3 that subcommittee is FDA staff, including  
4 leadership for multiple CDER and CBER offices. It  
5 provides oversight of policy development on real-  
6 world evidence, including guidances that I'll be  
7 describing. It offers resources in leadership to  
8 review divisions, among other activities.

9 In terms of external engagement, the  
10 committee provides feedback on early-stage  
11 proposals, not drug development per se, but rather  
12 novel ideas for new data collection, et cetera,  
13 cross-cutting ideas from sponsors or vendors. It  
14 also discusses initiatives presented to the  
15 subcommittee for consideration, and then there are  
16 additional activities such as holding FDA- or  
17 Center-level public meetings, or conducting small  
18 business and industry webinars, or speaking  
19 engagements such as this morning. Next slide,  
20 please.

21 If we turn just a slide or two on  
22 demonstration projects, here's where FDA is



1 investing in the future by funding projects that  
2 focus on data, study design, or tools, including  
3 via CERSI mechanism and other funding award  
4 mechanisms. I have six examples here listed. I  
5 think I'll just read across, left to right, for the  
6 first row, for the interest of time.

7 In terms of improving the quality or use of  
8 real-world data, the OneSource project with the  
9 University of California San Francisco is a project  
10 to improve the quality of EHR data. Why wouldn't  
11 clinicians want research-grade data at the bedside?  
12 That is one way to look at that project.

13 In the middle column, study design, the  
14 acronym RCT-DUPLICATE was a study of observational  
15 data. Actually EHR and mainly claims data was an  
16 observational cohort design to see if the results  
17 of randomized trials could be emulated. For those  
18 who are in the field, you might know that last  
19 week, in JAMA, the Journal of the American Medical  
20 Association, the Main Results manuscript was  
21 published, and I encourage folks to read that  
22 article if they're interested.

1           The right-hand column and the first bullet  
2 point under the tools category, we see evaluation  
3 of confounded treatment effects. If a study isn't  
4 a randomized trial, we worry that - the technical  
5 term is called, "confounding," where the result  
6 might be biased. This project funded a group at  
7 the University of North Carolina to look at how we  
8 have a better sense of how to use an approach to  
9 assess how much that confounding might impact the  
10 results. Next slide, please.

11           Here, I will go directly to guidances and  
12 spend about 8 or 10 slides discussing this topic.  
13 I will say upfront, these four screenshots are four  
14 of our main guidances for real-world data and real-  
15 world evidence. It should be apparent, as I walk  
16 through these slides, that we used a modular  
17 approach, one might call it, or a reductionist  
18 approach. Rather than try to write one single uber  
19 guidance that would be very long and very  
20 complicated, this is sort of one-stop shopping in  
21 the sense of when you want to know about data.

22           Let's look at the left-hand side of the

1 slide. Assessing electronic health records or  
2 medical claims has its own guidance, and below  
3 that, assessing registries. FDA's current thinking  
4 is reflected in those two guidances in terms of  
5 data sources.

6 On the upper right, data standards, we  
7 recognize that our data standards and our  
8 regulations anticipated clinical trial data. What  
9 do we do when we have data coming from real-world  
10 data sources? Well, this guidance helps explain  
11 that. Then on the bottom right, considerations for  
12 the use of real-world data and real-world evidence  
13 to support regulatory decision-making. Our  
14 regulations, again, anticipated clinical trials.  
15 What do we do if the design is observational? So,  
16 next slide.

17 Here, I'll start walking through those four  
18 guidances one at a time. This is a screenshot of  
19 the title of our so-called EHR claims guidance.  
20 Next, please. As an overview, the focus of this  
21 guidance is on selecting data sources to  
22 appropriately address the study question with very

1 granular details on development and validation of  
2 definitions for exposures, covariates, and  
3 outcomes, and recommendations on data provenance  
4 during accrual, curation, and analysis, and study  
5 design is handled elsewhere. Next, please.

6 This is the cover page of our,  
7 quote/unquote, "registries" guidance. Next.  
8 Here's where if a stakeholder is working with  
9 registries, we describe registry fitness for use in  
10 regulatory decision making, focusing on how to  
11 collect relevant and reliable data. Very often  
12 when using registries, linkage to other sources for  
13 supplemental information, such as claims, EHRs, and  
14 digital health technologies is involved, and we  
15 have recommendations in that regard. Then finally,  
16 we have a section on FDA review of submissions that  
17 include registry data. Next, please.

18 The data standards is the third of four core  
19 guidances from 2021. Next. Here's where we  
20 describe processes for managing real-world data and  
21 how to conform real-world data to FDA data  
22 standards -- again, that anticipated clinical

1 trials, mapping the real-world data to submission  
2 standards, and considerations for data  
3 transformations. Now again, this is a technical  
4 guidance, but it applies regardless of the type of  
5 real-world data; and certainly in terms of sponsors  
6 listening to this conversation, there are teams  
7 involved that would have the requisite expertise.  
8 If patient advocacy groups are listening, it's a  
9 question of making sure that the time, effort, and  
10 trouble of collecting the data is worthwhile, so we  
11 encourage early engagement with the FDA in that  
12 regard. Next, please.

13 This is the fourth of the core of four,  
14 regulatory considerations guidance. Next. Here's  
15 what I already alluded to: marketing applications  
16 to support the safety and effectiveness of a drug  
17 must satisfy legal standards, even if the 21 Code  
18 of Federal Regulations part 312 involving  
19 investigational new drugs does not apply. So our  
20 so-called IND regulations in part 312 did not  
21 anticipate the era of real-world evidence, but this  
22 guidance fills in the gap.

1 I will mainly say that there are two  
2 classifications of non-interventional studies. One  
3 involves only the analysis of data on the use of a  
4 marketing drug in routine practice. Secondly,  
5 there are ancillary protocol-specified activities  
6 or procedures. The drug could be given in clinical  
7 care but additional lab tests, imaging studies, or  
8 questionnaires might be performed, say, in a  
9 natural history study.

10 FDA does not consider these types of studies  
11 to be clinical investigations but, nonetheless,  
12 protection of human subjects is critical, so  
13 sponsors must meet the applicable requirements  
14 under the FDA regulation shown at the bottom of the  
15 slide in terms of protection of human subjects and  
16 institutional review boards. Next slide, please.

17 I'm now going to cover a few additional  
18 guidances that came out after 2021. This guidance  
19 on externally-controlled trials was published  
20 several months ago in 2023, and the next slide  
21 shows that the content emphasizes the importance of  
22 design considerations such as finalizing a protocol

1 before analyzing data; specific data considerations  
2 for the external control arm, various comparability  
3 issues; specific analysis considerations, and  
4 although FDA does not recommend a particular  
5 approach, it's basically picked the right tool for  
6 the job rather than us saying that a specific  
7 approach is better than all others in all  
8 circumstances; and then considerations to support  
9 regulatory review or access to patient-level data  
10 so we could do our job in the review mode.

11 Just as a technical note, this guidance does  
12 not address external control data based on  
13 summary-level estimates; rather, it's patient  
14 level, and it also doesn't address supplementing a  
15 control arm in a traditional randomized trial. The  
16 last scenario sometimes goes by the name of a  
17 hybrid randomized controlled trial. Next slide.

18 I really want to emphasize this point. It's  
19 from the external control guidance, but it really  
20 applies pretty much across the board. I'll read or  
21 paraphrase most of the text there.

22 Sponsors should consult with the relevant

1 FDA review division early in a drug development  
2 program about whether it is reasonable to conduct  
3 an externally controlled trial, or fill in the  
4 blank, instead of a randomized-controlled trial.  
5 As part of these discussions, sponsor should  
6 provide a detailed description of the reasons why  
7 the study design is viewed as appropriate; proposed  
8 data sources, and an explanation of why they are  
9 fit for use; planned statistical analyses; and  
10 plans to address FDA's expectations for the  
11 submission of data.

12 This, again, is a very pivotal point to  
13 make, so we try to share this every time we get a  
14 chance to speak externally. Next slide, please.

15 I also want to mention a procedural guidance  
16 "Submitting Documents using Real-World Data and  
17 Real-World Evidence to FDA." Next slide. I won't  
18 say much about that guidance, other than the main  
19 point with this guidance is that you could help us  
20 to help you -- as sponsors especially -- by in your  
21 cover letter, indicating exactly what is involved  
22 with the real-world data or real-world evidence.



1 All too often, we see false positives where the  
2 terms are just thrown in, or false negatives, where  
3 it's saying an externally-controlled trial is  
4 submitted and real-world evidence is not used. We  
5 could always update that for classification  
6 purposes, but since we have a mandate to report to  
7 Congress, it would be more efficient for everyone  
8 to adopt a standardized approach. Next slide,  
9 please.

10 The next slide is a chance for me to just  
11 summarize where I've been. If we look in the  
12 left-hand column, we see that the modular approach  
13 to guidance development is such that we have two  
14 guidances on data considerations themselves; one  
15 guidance on data standards for submission of data;  
16 a uber guidance, or an overarching guidance I  
17 should say, on the applicability of regulations;  
18 and then only 1 of 3 in our design category where  
19 the externally-controlled trials guidance has been  
20 published.

21 Please be aware that for a trial in practice  
22 settings, non-interventional studies guidances are

1 in development and will be going through the  
2 clearance pipeline in the near future. And last  
3 but not least, the procedural guidance that I  
4 mentioned was published in September of 2022. Next  
5 slide, please.

6 Not necessarily an RWE guidance, but Digital  
7 Health Technologies for remote data acquisition and  
8 clinical investigations, this gives me a chance to  
9 mention this guidance that was also generated in  
10 December of 2021. Next, please.

11 Here, I'll stop with the guidances and just  
12 try to bring us back to a more overarching view of  
13 real-world evidence. This article is entitled,  
14 Where Are We Now? The motivation for this article  
15 was that more than five years after passage of the  
16 21st Century Cures Act, mentioned earlier, the  
17 terms "real-world data" and "real-world evidence"  
18 were being used inconsistently and interchangeably.  
19 The content of the article, as you see: address  
20 two common misconceptions and provided conceptual  
21 overview. Then the last 3 of 5 items are grayed  
22 out because I've already discussed FDA

1 demonstration projects and guidance, et cetera.

2 So, next slide, please.

3 I just want to offer two misconceptions and  
4 hope that this discussion helps to clarify them.

5 First is that real-world data and real-world  
6 evidence are new concepts. As my historical  
7 context showed, in reality, sources of data and  
8 types of study design haven't fundamentally  
9 changed. What has changed is access to more  
10 detailed clinical data is evolving and the data are  
11 becoming more relevant and reliable as the  
12 community works on improving the quality.

13 The second misconception is that there's a  
14 simple dichotomy of randomized trials versus  
15 observational studies. In reality, trials are  
16 defined by assignment of treatment, but single-arm  
17 trials face challenges similar to the challenges of  
18 observational studies in determining whether  
19 differences in clinical outcomes represent actual  
20 treatment effects when randomization isn't  
21 involved.

22 The next slide follows from that second

1 misconception. I won't spend too much time on  
2 this, but I'll go from top to bottom: randomized  
3 interventional, non-randomized interventional, and  
4 non-randomized, non-interventional studies is a  
5 little bit of jargon, but it does divide the  
6 landscape into three general categories. The next  
7 row down, we see traditional randomized trials,  
8 trials in practice settings, externally-controlled  
9 trials, and observational studies.

10           The main take-home message comes from the  
11 bottom of that central figure, where there's a  
12 bracket saying, "generation of real-world  
13 evidence," but it's fine if we use real-world data  
14 to plan a clinical trial, but that doesn't give us  
15 any real-world data in terms of the drug outcome  
16 association that finds patients or it identifies  
17 sites. So just in terms of what Congress mandated  
18 us to do and what we're obligated to report, it's  
19 really the 3 of 4 columns to the right where real-  
20 world evidence is generated, and that involves an  
21 increasing reliance on real-world data. Next  
22 slide, please.

1           When we do get real-world evidence, what  
2           does FDA do? This is a very high-level overview of  
3           our approach. We ask questions related to these  
4           three domains: first, whether the real-world data  
5           are fit for use, and that is reliable and relevant;  
6           second, whether the study design can provide  
7           adequate scientific evidence to answer the  
8           question; and third, whether the study conduct  
9           meets FDA regulatory requirements. These questions  
10          actually could apply to clinical trials, but in a  
11          different way, so we often don't need to approach  
12          it quite the same way, but for real-world evidence  
13          studies, it's a different matter. Next slide,  
14          please.

15          Here's an example of how we applied our  
16          approach in terms of a new indication for Prograf,  
17          tacrolimus, based on real-world evidence. The drug  
18          had been approved for the prophylaxis of organ  
19          rejection in patients receiving liver and, later,  
20          kidney and heart transplants, based on traditional  
21          randomized trial evidence, and the drug was used  
22          widely in clinical care.

1 RCTs were not done, at least not for FDA  
2 purposes for lung transplant for various reasons,  
3 but the sponsor submitted a supplemental new drug  
4 application to FDA with a non-interventional,  
5 so-called RWE study. The data and design were  
6 evaluated according to the standards I mentioned,  
7 and here's, long story short, the approval for this  
8 drug in preventing rejection or death for lung  
9 transplant in July of 2021. Next slide.

10 The reason why this worked was that the U.S.  
11 Scientific Registry of Transplant Recipients data  
12 had information on all lung transplants in the U.S.  
13 during that indicated time period. Not only was it  
14 generalizable, but the data were the same quality  
15 that we would have expected from a clinical trial  
16 arm. The non-interventional observational  
17 treatment arm was compared to historical controls,  
18 and the analysis plan and the patient level data  
19 were provided to FDA.

20 FDA determined that this non-interventional  
21 study was adequate and well controlled, our highest  
22 evidence bar, and I should note, however, that the

1 outcomes of organ rejection and death are virtually  
2 certain to occur without therapy, so the dramatic  
3 effect of treatment helps to preclude bias as an  
4 explanation of results; another way to say this is  
5 not that this was easy, but this should not be  
6 viewed as an easy way to get a drug approval. Next  
7 slide, please.

8 On the flip side, that was a success story.  
9 This slide is a compilation of what has gone wrong  
10 across a multitude of submissions in the three  
11 categories of data design and conduct: issues  
12 related to reliability and relevance; the need for  
13 linkage that might not exist; missing or mistimed  
14 data, mistimed being if you're not in a trial, you  
15 might not get data at the intervals that a study is  
16 hoping for; and then sometimes endpoints are the  
17 problem.

18 We don't have time, and this is getting  
19 technical, but threat of residual confounding;  
20 problems with the index or zero time; or the use of  
21 an inappropriate comparator in that second  
22 category. And then in terms of the conduct, we

1 need to be sure that the protocol was prespecified,  
2 and we also have issues related to FDA inspection  
3 that time doesn't allow discussion of. Ok, next.

4 As I wrap up, in summary, big data  
5 contributed to changes in how evidence generation  
6 is approached and described, and research methods  
7 are indeed also evolving. I hope I've been able to  
8 show that FDA guidance and related efforts, along  
9 with the important efforts of other stakeholders,  
10 are addressing current challenges in using real-  
11 world data and evidence so that we can improve our  
12 ability to promote the public health with drug  
13 development. In this process, we will maintain  
14 evidentiary standards while considering real-world  
15 data and real-world evidence for regulatory  
16 decision making. Next.

17 There are too many people to thank, but this  
18 slide is a partial list, and the last slide is an  
19 email address if we don't have time for everyone's  
20 questions to be answered; or going forward, if  
21 questions about real-world data or real-world  
22 evidence come to mind, please don't hesitate to use



1 this general mailbox. Thank you very much.

2 DR. WINIECKI: Thank you so much, DR.

3 Concato.

4 I want to keep us rolling along because we  
5 have a jam-packed agenda today, and I want to make  
6 sure that we have time for the Q&A at the panel  
7 session at the end.

8 Our next speaker is Dr. Ramona Walls. She  
9 is the Executive Director of Data Science at the  
10 Critical Path Institute, and she has published over  
11 50 peer-reviewed papers in incredibly diverse  
12 fields: rare diseases; environmental health;  
13 evolution; biodiversity; sustainability; and space  
14 situational awareness.

15 In her current role, she oversees multiple  
16 efforts, including the development of C-Path's Data  
17 and Analytics Platform; expansion and modernization  
18 of C-Path's data integration pipeline, which  
19 encompasses new data types; and the development of  
20 a rare disease knowledge graph. She's going to  
21 highlight today some challenges related to siloed  
22 and non-standard data and how to organize data to

1 increase its utility.

2 Dr. Walls?

3 **Presentation - Ramona Walls**

4 DR. WALLS: Thank you so much, Dr. Winiecki.

5 Yes, as mentioned, I'm going to highlight  
6 some of the recent developments in data science and  
7 data management taking place at the Critical Path  
8 Institute, but I'll also give you a little  
9 introduction to C-Path for those of you that might  
10 not be familiar with it. Next slide, please.

11 I don't think I need to tell anyone on this  
12 presentation that rare disease data are rare. We  
13 know that because the patients are rare, and as a  
14 result, progress towards therapy for rare disease  
15 patients is hampered because we don't really  
16 understand what rare diseases are, what their  
17 natural history are, and what might work as  
18 treatments.

19 Nonetheless, there is potentially a lot of  
20 useful data out there, particularly around real-  
21 world data. As we just heard, there are electronic  
22 health records, patient-reported registries, but

1 there are also more traditional data sources like  
2 clinical natural history studies, and of course  
3 data from past clinical trials, and those really  
4 high-quality data sources like clinical trials are  
5 important for helping us to understand the  
6 potentially messier, less-controlled data from  
7 real-world data.

8           So that's a lot of what we focus on at  
9 C-Path, is integrating those different data types  
10 and making them more useful. Unfortunately, for  
11 us, and for the patients, many of those data  
12 sources that we do have access to are siloed.  
13 They're non-standardized and sometimes they're not  
14 usable due to data quality issues, which is a real  
15 waste when you get data, and you someone's worked  
16 so hard to collect it, and you really want to make  
17 use of it. Next slide, please.

18           Let me first highlight some of the  
19 challenges that we see [inaudible - audio gap] not  
20 being able to understand necessarily what the  
21 different variables in a data source are because  
22 they've not been standardized, or mapped to a

1 standard vocabulary, or there are no dictionaries.  
2 Often, even with the best intentions of the data  
3 collectors, standards may not cover all of the  
4 variables or the different pieces of data described  
5 in data sets, for rare data particularly.

6           Secondly, the data sources are often siloed  
7 in that they may not be accessible. They come in  
8 different formats. They use different standards  
9 that make them challenging to integrate them. And  
10 finally, because there are such small patient  
11 populations in rare diseases, those patient  
12 populations are often distributed among multiple  
13 data sources. So it might be that there are  
14 several groups collecting data or they might visit  
15 multiple medical centers, and if their data are  
16 distributed among those different sources without a  
17 reliable method for uniquely identifying the  
18 patients, it makes it very difficult to gather  
19 longitudinal data on patients, which is extremely  
20 valuable.

21           So how do we start to untangle this giant  
22 ball of string, which is patient data, and real-

1 world data, and clinical data, and put it all  
2 together into something useful? Next slide, please.  
3 That's really the focus of what we do at the  
4 Critical Path Institute, or known as C-Path. What  
5 is C-Path and what do we do? Next slide, please.

6 Our mission at C-Path is to act as a  
7 catalyst for innovation that accelerates the path  
8 to a healthier world, and our vision is to be an  
9 indispensable partner of excellence in medical  
10 product development worldwide, shaping innovative,  
11 scientific, and regulatory pathways to accelerate  
12 the delivery of therapies for patients in need.  
13 Next slide, please.

14 We do this through a number of different  
15 methods and using a number of core competencies.  
16 The first step at C-Path is to identify and unmet  
17 medical need. That might come internally. That  
18 might come to us through a community group. That  
19 might come to us from information from a regulatory  
20 agency, but once we've identified an unmet need in  
21 medical product development, we do start to then  
22 apply our core competencies. Those include data

1 management and standards; the development of  
2 biomarkers; predictive modeling and analytics;  
3 clinical outcomes assessments; and regulatory and  
4 development science. Through those, we combine all  
5 of those competencies. We work as a team. We have  
6 multiple teams that we all work together to develop  
7 drug development tools and other solutions. Next  
8 slide, please.

9 More specifically how do we do that? The  
10 key is that we want to act as a trusted neutral  
11 third party. We are a non-profit organization. We  
12 have a lot of regulatory experience, a lot of data  
13 science experience, and a lot of modeling  
14 experience, but we do it as a neutral third party  
15 that is open to anyone who needs to use our tools.

16 We develop public-private partnerships. We  
17 are funded in large part through the U.S. FDA, but  
18 we also have these public-private partnerships with  
19 industry, where we convene scientific consortia  
20 with our partnerships among industry, academic, and  
21 government agencies that share data and expertise  
22 to help us basically do the best science, gain the

1       broadest experience, build an active consensus, and  
2       share the risks and the costs for developing tools  
3       that might not be feasible to do for any one  
4       sponsor. Through our neutral convener status, we  
5       are able to enable iterative development with  
6       regulatory agencies like the FDA, EMA, and PMDA to  
7       participate in new methods and assess the safety  
8       and efficacy of different medical products. Next  
9       slide, please.

10               A little bit more specific workflow of how  
11       we do that with the overall workflow within C-Path,  
12       so why do we do it? First, we know that not every  
13       drug works for every patient, so you need to target  
14       the right patients, and that's really about data.  
15       We look at the patients and try to understand their  
16       population.

17               Who is doing this? This is a combination of  
18       researchers both inside and outside of C-Path,  
19       working with regulators, working with groups, be  
20       they academic or industry, that are conducting  
21       clinical trials, and working very closely with  
22       advocacy groups to understand the patient voice in

1 the process as well. We gather data from past  
2 clinical trials. Tradition, we've relied on data  
3 from past clinical trials, but more and more we're  
4 also including real-world data.

5 We spend a lot of time standardizing and  
6 integrating data to different models. Those  
7 include CDISC standards like SDTM, OMOP, or  
8 Observational Medical Outcomes Partnership, using  
9 ontologies. Once those data are standardized and  
10 integrated, we're able to put them into informative  
11 models. That's where our quantitative medicine  
12 comes in to start to work with our different  
13 consortia to develop tools.

14 What do those models do? They can identify  
15 biomarkers. They can be used for clinical trial  
16 enrichment, developing disease progression models,  
17 and again, we work to get those models and tools  
18 validated and approved, or endorsed, by regulatory  
19 agencies so that people that want to use them know  
20 that they're trustworthy. We hope that those  
21 result in the right target, the right drug, at the  
22 right time, and for the right patient. That's



1 really our end goal. Next slide, please.

2 As I mentioned, we've got this whole  
3 workflow that includes a lot of different efforts  
4 along the pipeline, from data sciences, data  
5 management, through quantitative medicine, and  
6 through the activities of our different consortia  
7 and partnerships, and through our regulatory  
8 science team. In this presentation, I'm going to  
9 focus on the data science piece of that. That's  
10 the first piece that is the bedrock of it, that  
11 gets the data and puts it together into a useful  
12 format.

13 You'll hear later from one of our consortium  
14 directors, Sorin Fedeles, about some of the work  
15 that one of our consortia is doing. But let me  
16 focus here, again, on what are we doing in data  
17 science, and how we're trying to advance the field  
18 of data science, particularly for medical product  
19 development. Next slide, please.

20 Within C-Path, one of the key departments,  
21 the department of which I am an executive director,  
22 is the Data Collaboration Center, or DCC, and the

1 DCC's mission is to enable multiple organizations  
2 to work together in a neutral setting and share  
3 data to maximize its value for medical product  
4 development and regulatory decision making. But we  
5 do that first through the creation and  
6 administration of data storage and collaboration  
7 platforms and through the planning and execution of  
8 multi-source data standardization and aggregation  
9 methods. We like to maximize the fairness of data  
10 by developing and integrating standards and  
11 semantic models; developing tools for consumption  
12 of sharing of data; performing data transformations  
13 that increase data accessibilities; and by  
14 performing analyses that transform data into  
15 information.

16 We are not the data science team that's  
17 turning data into models, but we're basically  
18 turning data into information that's useful for  
19 models and for all of the other tools. It's really  
20 important to us that we use robust repeatable  
21 processes to ensure data integrity, security, and  
22 protect patient privacy.

1           Within the DCC, there are four core teams,  
2           the Data Management team, who does all of the  
3           hands-on work of data acquisition, curation, and  
4           integration; the Data Science and Ontologies team  
5           that's responsible for semantic data modeling,  
6           metadata annotation, analytics tools and  
7           statistical modeling; our Data Platform team, which  
8           is really the sort of physical, or I guess more  
9           virtual, infrastructure, designing, and developing,  
10          and testing our different platforms and products  
11          and supporting Cloud infrastructure and data  
12          security; and of course the very important  
13          Operations team that keeps us all running and  
14          functional. Next slide, please.

15                 So I threw this word in the last slide about  
16                 maximizing the fairness of data, and I realized I  
17                 need to explain what that means because there may  
18                 be people on this who have not heard the term "fair  
19                 data principles" yet. FAIR stands for findable,  
20                 accessible, interoperable, and reusable. If you're  
21                 on this call, that means you probably care about  
22                 data, therefore I think that you should know about

1 the FAIR data principles. If you haven't seen the  
2 paper yet, there's a link here. It's a short paper  
3 in Nature from 2016 by Wilkinson, et al. that  
4 highlights what the FAIR principles are and how you  
5 can achieve them.

6 One of the key aspects of FAIR data  
7 principles is that they're really applying to both  
8 human and machine-driven processes. Humans have an  
9 innate understanding of what data mean, of the  
10 semantics of data as it were, but humans can't  
11 operate at scale, and they make mistakes. There  
12 are errors with machines, but largely machines are  
13 able to operate at scale with much less error, and  
14 particularly in this age of big data, we need  
15 solutions that scale.

16 So the FAIR principles describe how you can  
17 collect, manage, and share your data in a way that  
18 is scalable, repeatable, and reducible to make your  
19 data findable, accessible, interoperable, and  
20 reusable. They really come down to principles  
21 around meta-data, metadata, metadata, identifiers,  
22 and sharing standardized protocols and best

1 practices around sharing and storing data. So if  
2 you haven't seen them yet, please go out and read  
3 the paper on the FAIR data principles, and embrace  
4 them, and make them part of your everyday practice.  
5 Next slide, please.

6 How are we doing that within C-Path? We  
7 have an approach to data management that's a  
8 multi-step process. It begins with a data  
9 contribution agreement, so we want to be very clear  
10 that we are not the owners of the data; we're  
11 merely custodians of the data. It is the  
12 organizations that are contributing the data to us  
13 that maintain ownership, and they in turn are  
14 behaving as custodians for the patients and  
15 individual people about whom the data is.

16 Once the data contribution agreement is  
17 signed, the data are transferred to us through a  
18 secure link. We generally only accept anonymized  
19 data. We are not storing PHI, personal health  
20 information, within C-Path; however, with the  
21 growth of electronic health records and other real-  
22 world data, we have started to make occasional

1 exceptions where we can work with PHI, but we're  
2 generally using anonymized data. So we can also  
3 work with our data contributors to help them  
4 understand what they need to do to anonymize their  
5 data.

6           Once we get the data, we curate it, we  
7 standardize it, and we annotate it with  
8 terminologies and with links to other data. This  
9 blue arrow here shows an important step, that we  
10 provide feedback to the contributors. When we find  
11 problems with the data, we report those to the  
12 contributors. Now, if it's a past clinical trial,  
13 there's not really much that can change about it,  
14 but if we're working, for example, with a registry,  
15 we want to work with them and give them feedback on  
16 how they can improve their data collection  
17 processes going forward.

18           Once we've got the data in-house, and we've  
19 standardized it and curated it, we integrate it  
20 into different databases as part of our  
21 data-sharing platform, where it's available to  
22 approved researchers -- those may be internal or

1 external -- to extract data, and analyze the data,  
2 and combine it potentially with their own data for  
3 additional analyses.

4 Over the past few years, we've been making a  
5 lot of advances and innovations at each of these  
6 departments, so I'm going to just step through each  
7 of these steps. I'm going to walk through them and  
8 talk about some of the innovations that we've been  
9 applying at each step. Next slide, please.

10 When it comes to data contribution  
11 agreements, or DCAs, we've been working on  
12 standardizing those rather than having an  
13 individual data contribution agreement for each  
14 data source. We've been trying to have a small  
15 subset of them for different uses. That makes it  
16 much easier for us to manage the data and for us to  
17 explain to potential re-users of data what those  
18 conditions are on the data. We're also moving  
19 towards machine-readable data contribution  
20 agreements, which, again, make it easier for us to  
21 manage the data and ensure that we're being  
22 compliant with the terms of the DCA when we do

1 share it. Next slide, please.

2 For transferring, we've moved largely to a  
3 Cloud-based system for all of our data, so we use  
4 common Cloud platforms, your AWS -- we're not using  
5 Google Cloud -- and no endorsement of any of these  
6 systems is implied here; we just use different  
7 ones. But why is this important? One is for  
8 security reasons. We now have a secure method so  
9 that contributors can upload their data directly to  
10 the Cloud for us, so it never has to be on  
11 anybody's personal computer.

12 As I mentioned, because of the growth of  
13 real-world data, we're starting to offer some  
14 anonymization services through the Cloud, and we've  
15 been really focusing, as much as the world has, on  
16 federated access and federated analyses of data.  
17 There are a lot of challenges around that, which  
18 aren't really the topic of this presentation but a  
19 recognition that sometimes data need to stay where  
20 they are. It doesn't make sense to move really  
21 large data sets around, so we need to go out and  
22 move our analyses to the data, and we've been



1 working on methods for that within C-Path. Next  
2 slide, please.

3 In curation, standardization, and  
4 annotation, we've seen a lot of changes within  
5 C-Path over the past few years. We've developed a  
6 process that we call responsive curation, and that  
7 has to do with, really, rather than a slow process  
8 where all the data come in, it sits on our data  
9 store. Our data managers take it and spend six  
10 months to a year curating and getting everything  
11 beautiful before we can do analysis on it. We do  
12 the curation more in a step-wise process, so groups  
13 will come to us and say these are the variables  
14 that are most important or these are the data sets,  
15 and we focus on curating pieces of the data set at  
16 a time as is required, so we can prioritize  
17 curation to the data sets that are the most  
18 valuable and the most in demand.

19 We've also moved away from simply using the  
20 CDISC standards. We continue to use those, though;  
21 they're very important. But with the advent of  
22 real-world data, we've also adopted the OMOP

1 standards, the OMOP Common Data Model, which is the  
2 Observational Medical Outcomes Partnership. We're  
3 also starting to use ontologies such as OBO Foundry  
4 ontologies like the human phenotype ontology, which  
5 are also being incorporated within the OMOP Common  
6 Data Model vocabularies.

7 We started using scriptings and automations  
8 to try to speed up the curation process as much as  
9 possible, and we're developing an ontology and a  
10 knowledge graph that allow us to really integrate  
11 data and make additional inferences from data in a  
12 much more robust fashion. Next slide, please.

13 Within the integration and data-sharing platform,  
14 we do have a new platform specifically for rare  
15 diseases called the RDCA-DAP or Rare Disease Cures  
16 Accelerator-Data and Analytics Platform. That  
17 platform has advanced search discovery, and  
18 visualization, and subsetting tooling available,  
19 where once you've requested access, you can go in  
20 and preview what data are available, do queries on  
21 it to see how many missing subjects are there for  
22 different variables; that sort of piece, to find

1 out if the data are valuable before you go through  
2 the request process.

3           Once you have requested access to the data,  
4 you can move it into a platform where  
5 there. Sorry, I'm getting ahead to the next one.  
6 Let me talk about this one about data sharing. We  
7 have access in terms of sharing. Rather than  
8 having to share an entire data set, an aggregated  
9 data set, we can share different pieces, so we have  
10 these fine-grained controls within there. Again,  
11 similar to the data contribution agreements, we are  
12 trying to standardize our data use agreements to  
13 make it much clearer and easier for users to  
14 understand what their obligations are when they are  
15 requesting access to this data, and what they have  
16 to report, and how to use it appropriately, while  
17 protecting patient privacy and intellectual  
18 property as well. Next slide, please.

19           As part of the platform, we also have a  
20 workspace. There are places where you can come and  
21 do the work once you've requested access to it.  
22 You can move the data into a workspace that has

1 built-in tooling for analysts like data previewing  
2 using R, SQL, and virtual machines for doing  
3 customized analysis. There is a lot of enhanced  
4 security on our platform that includes logging of  
5 all activities; TFAs, two-factor authentication;  
6 and restriction of downloads. You need to request  
7 permission to download data, and that will, again,  
8 reflect what was signed in the data use and data  
9 contribution agreements.

10 You can also share. It's a collaborative  
11 platform, so you can share your analyses with other  
12 collaborators and with regulators. If you've done  
13 your work in the platform, if you've developed a  
14 tool and you want to share it with the FDA, you can  
15 invite them there to come directly to the platform  
16 and do the review of your tool and the data right  
17 there, and you can also bring your own data. If  
18 you have private data that you want to add to  
19 public data sources, that's possible. Next slide,  
20 please.

21 Here's just a screenshot preview of the data  
22 discovery part of our platform, of RDCA-DAP, what's

1 called FAIR Data Services, and there's the use of  
2 the term "FAIR" again because it is trying to make  
3 data fair. Through the FAIR data services  
4 platform, you can come in. You can do a search.  
5 You can browse the different data sets. You can  
6 request access to them. You can view the data  
7 dictionaries to see what data are there, et cetera.  
8 Once you've requested access -- next slide, please  
9 -- you can move the data into a workspace, and  
10 workspaces are where you can do the actual  
11 analyses. You can do previews. You can share all  
12 of the different features that I mentioned in the  
13 last slide, so these are the tools that are  
14 available.

15 Now, this is right now called the RDCA-DAP,  
16 the Rare Disease Cures Accelerator-Data and  
17 Analytics Platform, so it's appropriate for rare  
18 diseases. But I'll mention that we are moving this  
19 to become the C-Path DAP, the C-Path Data and  
20 Analytics Platform. So it will not only house our  
21 rare disease data; it will ultimately house most,  
22 if not all, C-Path data within this platform, and

1 we think the security and functional advantages of  
2 this platform are so great, that it's worth moving  
3 that into making this our main platform. Next  
4 slide, please.

5 Just to wrap up this section on innovations  
6 with a little piece about what we're doing in terms  
7 of data standardization, as I mentioned, we're now  
8 using both the OMOP Common Data Model, as well as  
9 the CDISC SDTM data model. They both have their  
10 advantages and disadvantages for different  
11 situations, so we are continuing to use both of  
12 them.

13 SDTM is really crucial. If we're only  
14 integrating clinical trial data that's already in  
15 that model, it's really the best choice. On the  
16 other hand, if we're using real-world data and we  
17 need to use a long-tail registry data or very large  
18 EHR data, then OMOP tends to work better. OMOP  
19 conveniently uses standardized vocabularies from  
20 the Unified Medical Language System, UMLS, like  
21 SNOMED, LOINC, RXNORM, and CDISC on the other hand  
22 is already linked to NCIT, the National Cancer

1 Institute Thesaurus, so there are big differences  
2 in their vocabularies. And again, there's no  
3 perfect biomedical vocabulary out there yet. We do  
4 a lot of work to map across all of these different  
5 standards and vocabularies, and that's where  
6 ontologies come in.

7           We are using OBO ontologies. OBO stands for  
8 the Open Biological and Biomedical Ontologies  
9 Foundry, or OBO Foundry, which are a set of very  
10 semantically enriched ontologies. Unlike  
11 ontologies, say, in SNOMED, which has hierarchical  
12 structure and some relationships across different  
13 pieces of the ontology, the OBO Foundry tends to be  
14 more robust in explaining exactly what a term is  
15 and how they're defined. That allows us to encode  
16 additional information within those levels and do a  
17 deeper level of integration than might be possible  
18 using simply the OMOP standard vocabularies or  
19 NCIT.

20           What we're doing with those within rare  
21 diseases is building a knowledge graph, and that  
22 knowledge graph is quite different from others.

1 There are a number of knowledge graphs out there,  
2 and some really good ones, but what we're doing is  
3 integrating many of those existing knowledge  
4 sources with patient-level data because we have  
5 access to individual patient data in C-Path, and  
6 we're making sure that we're interoperable with  
7 those other sources like Orphanet or the Monarch  
8 knowledge graph, and the European Joint Programme  
9 on Rare Diseases.

10           Again, the main focus of this talk is not  
11 knowledge graphs, but since it might be a new topic  
12 to many of you, let's go to the next slide, and  
13 I'll just give you a quick preview of what a  
14 knowledge graph is. A knowledge graph is  
15 essentially combining the data plus the ontology.  
16 So the ontologies provide a model of experts  
17 understanding of what things mean in the real  
18 world, and the data are actual instances of  
19 patients who have these diseases.

20           In this particular case, if you look on the  
21 bottom right with all the blues, there's the  
22 clinical data condition occurrences. That tan dot



1 in the middle is the class for, in this case,  
2 Friedreich's ataxia, and then we've got all of the  
3 different individual observations of patients with  
4 Friedreich's ataxia in blue around that. But  
5 because that Friedreich's ataxia disease is linked  
6 through the ontologies to all this other knowledge,  
7 it connects up to cross species knowledge about  
8 gene expression that might control ataxia's  
9 morphological information about how body functions  
10 and parts relate to one another, and other  
11 phenotypes that are specific to that disease and  
12 might relate to other diseases.

13 So basically, the knowledge graph allows us  
14 to connect patients to the larger world of  
15 biomedical knowledge that's out there, and make  
16 some inferences about what patients might be  
17 similar based on their phenotypes or their  
18 genotypes. How might the phenotypes of one disease  
19 relate to another disease? How might we understand  
20 some of the preclinical work that's done in model  
21 organisms? How could that inform development of  
22 drugs or clinical trials within humans, for

1 example? That's just the highlights of some of the  
2 work that we've been doing within the Data  
3 Collaboration Center at C-Path. Next slide, please.  
4 This is what we do. We take this data and we try  
5 to make it useful as possible. What can you as  
6 data contributors, people who are collecting data  
7 and working with patients, do to help make this  
8 whole landscape better and more effective? Whether  
9 you're a small or a large generator of data, this  
10 can apply to you, hopefully. Next slide, please.

11 First is sharing data in an appropriate way.  
12 I'm just going to highlight a couple of slides here  
13 from a webinar that we gave last week through the  
14 clinical research data-sharing lines, and it's  
15 based on a paper that recently came out in applied  
16 clinical trials. In this webinar, we  
17 discussed -- it was the results of a survey. I  
18 won't go into all the details of the survey, again,  
19 because you can read the paper.

20 Basically, it's clear that some documents  
21 need to be shared that are more important than  
22 others. I'm sorry this is a bit small, but

1 basically we have the ADaM Data Set, the SDTM, the  
2 Data Dictionary, the Digital Specifications, and  
3 the Study Protocol. Over 80 percent of patients  
4 said that those were important, and all of these  
5 supplemental documents, for all of them, over  
6 90 percent of patients said that they were  
7 mandatory, or important, or at least useful.  
8 People who are reusing the data need the  
9 supplementary documents, so if you're going to  
10 share your data, please be sure to share the  
11 information that allows others to understand what  
12 your data mean.

13 A particularly important piece is the  
14 Variable-Level Transformation Report. When data  
15 are anonymized and shared, transformations happen.  
16 If others don't know how you transform your data,  
17 it's very difficult for them to then go in and  
18 reuse it. Next slide.

19 But ironically, even though we know those  
20 documents are important - and- this is only for  
21 companies; this is not registries or academic  
22 institutions. Companies are not necessarily

1 sharing that important information.

2 Tier 1, or large companies, which was over,  
3 I think, 25,000 employees, are consistently sharing  
4 the required document, probably because they have  
5 the resources and larger data-sharing teams to do  
6 that, but as you move into smaller companies -- and  
7 we're pretty sure that we know from experience,  
8 this is also true for academic  
9 institutions,-- those documents are not being  
10 shared. So there's a real mismatch here between  
11 what's required of people who are using the data  
12 and what companies are willing to share. So in  
13 other words, we suspect a lot of people are just  
14 checking off the box saying, "Yes, I shared my  
15 data," but they haven't really done the due  
16 diligence to share everything that's necessary to  
17 make that data useful. So what should you do? Next  
18 slide, please. I'll wrap up with this. Follow  
19 FAIR data principles, know what they are, and try  
20 to follow them. Make sure that you ensure proper  
21 anonymization and include your anonymization report  
22 when you share your data. Where possible, use

1 standardized terminology and data models. OMOP and  
2 SDTM are two good ones, but they're not the only  
3 ones.

4 Use standardized vocabularies like the UMLS,  
5 use the NCIT, the common data elements from NIH.  
6 Use ontologies like the Human Phenotype Ontology to  
7 describe phenotypes. Phenotype is a very broad  
8 term here. That includes everything from hair  
9 color, to organ function, to clinical outcome  
10 assessments of patient performance.

11 Following consistent data protection  
12 practices from year to year, I know that's not  
13 always possible for smaller groups because you  
14 collect data for a year, and then you learn what's  
15 more important the next year, and you improve it,  
16 and then you learn more, and then you improve it.  
17 But because longitudinal data are so important, the  
18 more that you can aim for backwards compatibility,  
19 at least with your data, the more valuable your  
20 data will be.

21 Especially share your dictionaries, share  
22 your protocols, share the other supplemental

1 documents, and work with those who are going to  
2 reuse your data to make them understandable.  
3 Realize that as a data sharer, you are probably  
4 also a data re-user. Most people that share data  
5 also reuse data, so be a good player, be a  
6 productive part of the ecosystem, and make sure  
7 that you're not just checking the box when you  
8 share your data, but you're contributing data  
9 that's actually valuable and doing the most service  
10 to your patients about whom that data are  
11 collected.

12           With that, I believe that's my last slide.  
13 Next slide, please. Thank you very much, and I'll  
14 pass it off to the next speaker.

15           DR. WINIECKI: Thank you, Dr. Walls.

16           Now we're going to move to our third talk.  
17 Our speaker is Vanessa Vogel-Farley. She is the  
18 Senior Director of Research and Data Analytics at  
19 Global Genes and the principal investigator for the  
20 RARE-X Data Collection Platform. She possesses  
21 20 years of experience in data collection methods,  
22 as well as expertise in non-profit and research

1 operations, patient advocacy and support, and  
2 non-profit management. Her talk today covers  
3 expansive topics, from privacy and data governance,  
4 to how to organize and share data for the maximum  
5 benefit of all shareholders.

6 Vanessa?

7 **Presentation - Vanessa Vogel-Farley**

8 MS. VOGEL-FARLEY: Thank you so much for  
9 having me. My name is Vanessa Vogel-Farley, and I  
10 serve as the senior director of Research and Data  
11 Analytics for Global Genes and their RARE-X  
12 program. To change the world for rare disease  
13 patients globally, we must think differently. One  
14 of those ways is by increasing the speed and  
15 productivity of innovation in rare diseases by  
16 increasing the collection and access of structured  
17 and standardized patient data, which is what I'll  
18 be talking about today. I actually want to rename  
19 my talk, basically, to Make Ramona's Job Easier.  
20 That's what I should rename it. Next slide,  
21 please.

22 The speed and productivity of innovation in

1 a rare disease is often limited by cost and lack of  
2 access to standardized, structured, and available  
3 patient data, which you've heard from the two  
4 previous speakers; or data exists in silos and is  
5 unavailable for open research; or data is not  
6 structured and standardized in a format that's  
7 useful to research or patient communities; or data  
8 just doesn't exist yet since many patient  
9 communities are too young or don't have the  
10 resources to connect data for research towards  
11 treatment development. These are the areas that  
12 hold promise of unlocking data in various ways.  
13 Next slide, please.

14 Patient organizations in the rare space  
15 often start from the ground up, forming registries  
16 for their communities to gather the much needed  
17 data that we've been hearing about, but how do we  
18 go from registries to real-world data and show what  
19 patient-powered registries can really enable, all  
20 the way to supporting regulatory requirements?  
21 Next slide, please.

22 We're living in a world where patients and



1 patient advocates have more opportunities than ever  
2 for helping to overcome some of the data collection  
3 challenges that drive biopharma, where patient  
4 groups are partnering effectively with biopharma,  
5 governmental regulators, and goal networks, and  
6 they're becoming investors in that space, and some  
7 are even becoming biotech entrepreneurs. I'm going  
8 to focus today on the patients as research and  
9 development partners and drivers and how can  
10 patients and advocacy groups support the collection  
11 of patient-reported outcome data in a way that can  
12 actually be valued and used. Next slide, please.

13 The process of data collection and research  
14 in clinical trials starts with the process of  
15 consent -- so I'm really going to start from the  
16 bottom -- and ensuring data is accessible as  
17 possible with the goal that accessibility extends  
18 post the initial intended purpose needed to  
19 decrease the time to new treatments for rare  
20 diseases. Next slide, please.

21 Consents and protocols should include  
22 language and supported patient-focused data

1 governance and standardization language for broad  
2 data usage. What this means is those who are  
3 collecting data in this space, while you might not  
4 have started in this manner -- meaning consents or  
5 governance protocols might not allow for data  
6 sharing in a more robust way, -- the time is now.  
7 There's no time like the present to review and  
8 evaluate your existing consents and protocols to  
9 create enabling data-sharing language and to add  
10 data management procedures and recommendations with  
11 inclusion and usage of this data collected post the  
12 original intention of the data. There are also  
13 opportunities to create more robust data on  
14 ecosystems around rare disease communities by  
15 enabling this. Next slide, please.

16 So how we do this at RARE-X is we actually  
17 go beyond the single-informed consent for data  
18 sharing. This is an example of how collecting data  
19 use preferences in a direct efficient manner so  
20 that it can be used in a machine-readable manner,  
21 sort of like make Ramona's job a little bit easier.  
22 So we're asking the patients themselves where they

1 want the data to be shared from the point of  
2 inclusion and any data collection efforts that  
3 we're doing. Next slide, please.

4 To leverage data use ontology, I want to  
5 talk a little bit about this as well. Ontology is  
6 general ways of labeling data, a variable or  
7 something that's coming into your system, that  
8 creates a meta-data or a meta-item. How we use  
9 those for data sharing, we educate the patients in  
10 a two-prong approach when it comes to empowering  
11 patients to share their data. In our case, there's  
12 a presentation of the data use options, which are  
13 the ontologies. You use our GA4GH data-sharing  
14 preferences that are shown as part of the consent  
15 process that's direct to the patient and what we  
16 call the Data Sharing Preference Survey, where  
17 there's a separation of the represented data-use  
18 ontologies to enable the patient to review those  
19 independent of the rest of the study consent.

20 So it's outside of what this study talks  
21 about, it's outside of the data you're collecting,  
22 and it's really just saying, okay, we have this

1 data and we are consenting to have that data  
2 collected, but now, where do you want your data to  
3 be shared after the intended use? And they're able  
4 to review those potential data-sharing options  
5 multiple times and update those outside of the  
6 consent document itself. So over time when they're  
7 participating in longitudinal data studies, they  
8 can update them, depending upon the data sharing  
9 opportunities out there. Next slide, please.

10 We use data-use ontologies, which is a  
11 structured vocabulary of standard, human, and  
12 machine-readable use terms that have been adapted  
13 in a patient-friendly manner. I know this is  
14 really small, but what we did is we went into GA4GH  
15 data-sharing ontologies and made it more patient  
16 friendly, the way that we describe the types of  
17 data collection and data usage that are out there,  
18 and made sure that they could understand it in a  
19 very patient-friendly way, and also made it more  
20 specific to patient data. There's a lot of things  
21 in GA4GH that's from genomics data and large data  
22 usages, so we really made the ones that were more

1 specific to the patients available to them. Next  
2 slide, please.

3 So outside of consent, what are the next  
4 steps for using standards at the time of data  
5 collection? Basically, it's how we make efforts  
6 like C-Path's efforts more robust and easier. Next  
7 slide, please.

8 But when it comes to data collection models in the  
9 rare space, since there are more than 10,000-plus  
10 rare diseases, we need to take into account the  
11 splitting and lumping that are needed to address as  
12 many patients as possible.

13 For example, we know that in the rare space  
14 there are N of 1's. There are individuals or the  
15 undiagnosed population where they're still on their  
16 diagnostic journey, or we have patient communities  
17 that vary from a couple patients all over the world  
18 to really large patient communities that are in the  
19 rare space. Then we have the disease consortia,  
20 where they're based upon body system or symptoms  
21 that bring together several disease communities  
22 around one symptom, and usually towards better drug

1 treatments or drug interventions because they can  
2 address that symptom rather than necessarily the  
3 disease as a whole.

4           There are data collection challenges with  
5 each one of these, but starting with the data  
6 collection model based on standards, we have the  
7 ability to ensure that any data collected is able  
8 to be used in a data ecosystem, similar to what  
9 Ramona was talking about, more quickly than those  
10 that are not. Next slide.

11           To meet as many stakeholder needs as  
12 possible, the standards and guidance that are  
13 consulted by RARE-X are the ones that you've heard  
14 about, the alphabet soup, and I know that somebody  
15 in the chat actually asked for a definition of a  
16 lot of the alphabet soup that we've been talking  
17 about. CDISC, Human Phenotype Ontology; the NIH  
18 Metathesaurus; the Common Data Elements Repository;  
19 PhenX; LOINC; SNOMED; Orphanet, ICD codes are all  
20 part of those, but also guidances that are put  
21 forward by regulatory bodies like FDA, which was  
22 presented earlier. Those links are in the chat,

1 and they will also be in our slides, so make sure  
2 to look at those, and NCATS guidances; the  
3 scientific community; industry partners; and in our  
4 case in the rare space, guidance from patients,  
5 too.

6 Data collection in this space, when you're  
7 looking at small n's or you're looking at  
8 communities that are really spaced out, guidance  
9 from patients is really needed to make sure that  
10 your data collection is able to be robust and  
11 maintained over time, especially when it's based on  
12 standards. Next slide, please.

13 The application of these data standards and  
14 data models to provide infrastructure to support  
15 comprehensive data for analysis, we need to gather  
16 precise data, map it to the ontologies, and layer  
17 it with other data sources, and share it, really,  
18 to make sure that that's data getting out there.  
19 Starting with a general core in RARE-X is an  
20 example of how we collect standardized data and how  
21 we create our data models. We start with a general  
22 core, where it's a head-to-toe survey, where every

1 patient that comes in gets it, and lets us know  
2 what part of the data model they're going to plug  
3 into, what's being affected in the disorder that  
4 really means something to them, and what they want  
5 to give more data about.

6           Enabling disease core by domains, where  
7 these are HPO mapped domain-specific data, and  
8 layering them on supplemental disease data that can  
9 be detailed or more specific to that disease, and  
10 then integrating other data sources like EMR and  
11 EHR, which were talked about, and some clinical  
12 reports, and maybe some custom curation forms  
13 around genetics or labs, or those sorts of things,  
14 while always allowing the flexibility for  
15 exploratory data collection; since in the rare  
16 space, we need to acknowledge that there are areas  
17 with standards that just don't exist yet, and we  
18 really need to make sure that we're addressing  
19 those in capturing data around those in these  
20 patient communities, as well as making sure that as  
21 we're capturing that data in these more structured  
22 ways, that we can move towards making new standards



1 that meet the rare disease needs. Next slide,  
2 please.

3 Just as a little bit of definition of our  
4 general core, a general core for us is a data  
5 element that can be consistently collected across  
6 all disease communities in all studies or  
7 therapeutic area. A disease core element is a data  
8 element specific to a therapeutic area or specific  
9 disease constellation of central modalities, like  
10 you're looking at a therapeutic area of epilepsy,  
11 but lots of diseases have epilepsy, so that's a  
12 disease core where it's one of the most prevalent  
13 symptoms in that space, so that's one of our  
14 questionnaires around that.

15 Then there's supplemental or custom surveys,  
16 where our data element is commonly collected in  
17 clinical research studies, but whose relevance  
18 depends upon the study design and the type of  
19 research steps involved. This is kind of getting  
20 back to the real-world evidence and real-world data  
21 applicability, and these can be developed on a  
22 case-by-case basis, based on standards and

1 ontologies towards robust implementation in that  
2 larger data ecosystem. Next slide, please.

3 One effect of data models used in this  
4 manner is the investigation of disease overlaps,  
5 and symptoms and disease biology is unlocked.  
6 Here's an example of our three semi-different  
7 disorders with similar mechanisms of being an ion  
8 channel disorder are able to be compared with their  
9 similarities and their differences. These sorts of  
10 analyses can bring a core of targets that have  
11 never been identified before in drug development.

12 In the rare space, this is so important  
13 because when it comes down to it, yes, we are rare,  
14 but there are so many things that we do overlap in  
15 terms of symptomatology and also targets when it  
16 comes to drugs. So why not actually lump when we  
17 can and split when we need to when it comes to  
18 these sorts of things? And when you're basing your  
19 data collection on standards and you're basing your  
20 data collection on really robust governance, this  
21 enables that really, really well. Next slide,  
22 please.

1           To gather data to facilitate each of these  
2 data elements that we've been talking about, we  
3 need to do that in a domain-based standardization  
4 module with machine-readable ontologies where we  
5 can move it through a system, like we've been  
6 talking about with C-Path. Here's a quick sample  
7 of the domains we collect currently on the RARE-X  
8 platform, as well as some of our domain expansion  
9 prioritizations -- next slide, please --  
10 like how to prioritize, especially when you're  
11 going into this space where you're saying I'm a  
12 patient community leader or I'm a researcher  
13 entering into some of the rare disease spaces. How  
14 do you prioritize what you're going to collect and  
15 how do you structure your data model?

16           Well, you turn to the experts, and that  
17 includes patients. In order to prioritize any data  
18 collection effort that we do for research-grade and  
19 comparable data, we establish multidisciplinary  
20 expert working groups for each of the domains.  
21 Some of them might overlap and some of them might  
22 not, but as you can see here, they represent

1 pharma, they represent the patient groups, they  
2 represent clinicians, and they represent academics,  
3 to make sure that we're bringing forward the right  
4 symptom domains, and landscaping what's out there  
5 and what's going on in the space right now, rather  
6 than relying on studies that have been done decades  
7 and decades ago.

8           Then categorizing those patient-reported  
9 outcome measures or those clinical outcome measures  
10 that really need to be brought forward for these  
11 community groups, and then deeply review and  
12 discuss those measures to narrow them down. What's  
13 too long for these patients to sit down and do it  
14 at one time? How do we kind of layer those aspects  
15 where this is a good layer that we can jump off and  
16 branch to get more data in more standardized areas?  
17 Then confirm the final measures to the level of  
18 data collection being focused on, depending upon  
19 what the domain is.

20           Then we go through all the paperwork of  
21 licensing and technical implementation, which I'm  
22 sort of glossing over, but that ends up being a

1 really, really big deal when you're coming to the  
2 space of standardized data collection. When you're  
3 using license-validated measures or using a survey  
4 that might be based on ontologies, the technical  
5 implementation of licensing is really, really  
6 important in that space. Next slide.

7           One of the questions answered and posed was  
8 how to best use the data from natural history  
9 studies for rare diseases? Up until now, the  
10 domains that I've been talking about are mostly  
11 patient-reported outcomes, that we bring the data  
12 collection to the patients, because at the end of  
13 the day, we know that rare disease doesn't have any  
14 borders. It doesn't have any SES regulations, and  
15 it really affects everybody. So when you're coming  
16 into the space, how do I make sure I get data  
17 collection direct to the patients where they are?

18           In the space of the natural history studies,  
19 in the past, you have to bring the patient to the  
20 data collection. One of the ways that we're  
21 approaching natural history studies in more of an  
22 agnostic way and gaining some traction are more

1 basket-style natural history studies. We hear  
2 about basket-style clinical trials, but what about  
3 basket-style natural history studies across rare  
4 diseases? Many clinical and research programs  
5 launched for multiple rare disorders are similar in  
6 phenotype, and due to the increased demand, how do  
7 we help clinicians and researchers collect the data  
8 and point of care in natural history study data?

9 We're in pilot phase with a clinic that has  
10 a neurogenetics focus, where clinical outcomes  
11 assessments are most applicable to the patients  
12 that have been decided and are collected as part of  
13 clinical care, where they include  
14 clinician-reported scales, clinical observation  
15 assessments, patient-reported scales, as well as  
16 the platform that's available to them via RARE-X.

17 The data model that was created was done  
18 based upon a working group really similar to the  
19 one that I've just described, but really bringing  
20 it down to what can you get done when they're being  
21 seen in clinic, what really makes sense when you're  
22 looking at the holistic patient, and what makes

1 sense that we can collect over time; so really  
2 making sure that we're addressing what is being  
3 able to be collected when a patient's being seen  
4 there, and then also additional data sources like  
5 EHR to decrease the duplicative entry of data so  
6 you're not answering a question twice, so  
7 clinicians aren't entering something in the EHR as  
8 well as in the research record, and making sure  
9 that we're bringing together those data sources on  
10 the background and leveraging the technology that  
11 exists to do that these days. Next slide, please.

12 I talked a little bit about validated  
13 instruments. In rare research, validated  
14 instruments sometimes become a little bit of a  
15 sticky subject. Validated instruments are also  
16 known as questionnaires, patient-reported outcomes,  
17 and clinically-reported outcomes that have been  
18 studied extensively, using specific scientific  
19 criteria and statistical methods that give us  
20 confidence that they're reliable and valid in the  
21 population used to validate the instruments.

22 For an example, an instrument validated to

1 help people with cancer may not be applicable to  
2 caregivers of rare epilepsy, just as a really  
3 random example. But there's also FDA definitions  
4 of all of these things, so when you talk about  
5 validated instruments, they're really important  
6 because we know they're valid and we know they're  
7 statistically reliable for data analysis,  
8 but -- next slide, please -- there's a catch-22  
9 when it comes to validated instruments in rare  
10 disease. We need them for regulatory  
11 purposes -- we know this -- but they often force us  
12 to use proxy-reported outcomes when it's coming  
13 into the rare space, when the patients themselves  
14 are not able to answer for their own feelings and  
15 those sorts of things, and it results in data that  
16 may not represent what the patient is actually  
17 experiencing. It might be representative of what  
18 the clinician is seeing, or what the caregiver is  
19 seeing, but it might not actually be what the  
20 patient is seeing.

21           There's a need in the rare disease space  
22 when it comes to validated instruments for the



1 development of new ones to address these  
2 challenges, and the acceptance and qualification of  
3 appropriate instruments [inaudible - audio  
4 gap] -- in standardized data collection -- can use  
5 a question that's not validated and still be seen  
6 as compliant or ontology compliant, and could be  
7 seen as one of the ontologies, but it could be just  
8 in general standards compliant. This is a very  
9 important for rare diseases, where validated  
10 instruments tend not to hit the mark, as I just  
11 talked about. Next slide, please.

12 The answer is yes, but tread carefully. As  
13 we've heard from the last two speakers, when you're  
14 doing research and entering to the space, you want  
15 to be thoughtful about how you're implementing your  
16 disease or your data collection. There are many  
17 recommendations out there that will meet the  
18 requirements, but make sure you're opening up that  
19 conversation early and often.

20 The FDA has fantastic contacts, that when  
21 you're entering into the space, whether you be a  
22 researcher, a clinician, a patient advocacy group,

1 or a biopharma who's entering into a new rare  
2 disease space, reaching out to them to say this is  
3 what we're collecting, this is what we think the  
4 purpose is, and this is how we're thinking about  
5 designing these efforts, is really good, and to  
6 engage them early and often because it's really  
7 needed in this space to make sure that the  
8 communication around your data collection efforts  
9 is clear, and what you're collecting from the  
10 patients is really worth the time and the effort,  
11 so it's fit for purpose. Next slide, please.

12 At this point in the story, we've got data.  
13 We've got consent to collect the data. We've  
14 collected the data in a hopefully more standardized  
15 way, where the data is able to be used past its  
16 intended point. It has the ontologies to be able  
17 to move through these different data systems. But  
18 now, how do you connect the other data sources that  
19 are existing?

20 You might be collecting your own data in  
21 your academic environment, or your patient advocacy  
22 group, or your biopharma. We know that other data

1 sources exist in all these spaces, and for rare, in  
2 order to make that data ecosystem or that data map  
3 for that patient, or that patient community, we  
4 need to be able to connect these data sources.

5 Next slide, please.

6 This is just an example of the way that you  
7 can interconnect and support other data. I'll  
8 focus a lot about data generation and data  
9 governance. There's data in many communities, and  
10 it is important to make sure we're able to connect  
11 towards research questions and towards clinical  
12 trial design. This includes EMRs, historical  
13 physician notes, diagnostic testing, and journey  
14 information, as well as additional studies that our  
15 advocacy groups are supporting or researchers are  
16 supporting, and that we are partnering with  
17 biopharma on.

18 In the last 5 to 10 years, the speed at  
19 which Cloud computing and federation of data  
20 technologies are being brought forward is so  
21 exciting, and being able to have these data sets  
22 accessible in a federated manner, or an uploaded

1 manner, can really unlock the potential of all  
2 these data sets. Sometimes this means being  
3 directly connected to the data. It's uploaded, and  
4 you're actually getting it out of there on a direct  
5 patient basis. Other times, the data needs to stay  
6 deidentified in some of these areas, or actually  
7 where it was, as Ramona said earlier, but could be  
8 used as a comparison or hypothesis testing  
9 analyses, especially in a rare space when you need  
10 those comparators to be able to do effective data  
11 analysis.

12           Sometimes when governance inhibits data  
13 access, it may be useful just to have the previous  
14 data models to determine the efficacy of that data  
15 collection effort to potentially incorporate or  
16 improve new data collection efforts, meaning that  
17 if you've collected a natural history study and you  
18 didn't use half of the data, or used 100 percent of  
19 the data, that's an amazing model that really could  
20 be implemented in different areas, especially in  
21 this space, to create robust and standardized data  
22 collection over time. The goal and the mantra, in

1 general, in the rare space is meeting data where it  
2 is and leveraging technology to interconnect or  
3 federate, in whatever manner we're able to, towards  
4 no data left behind. Next slide, please.

5 So with this growth comes the true phase  
6 shift of how we think about data management and  
7 inverting the model of data sharing towards public  
8 good for all efforts versus commercial and closed  
9 data, those silos that we talked about earlier.  
10 The opportunity for us right now is to bring  
11 researchers to the data or data to the researchers  
12 in whatever way, shape, or form we can.

13 RARE-X places data in the Cloud, where the  
14 data can be computed and brought together with  
15 researchers. They can collaborate. Similar to  
16 what Ramona was saying for their Cloud-based  
17 efforts for C-Path, we do something similar to  
18 RARE-X. Researchers can store the data and access  
19 a single copy of the data, and these address the  
20 concerns of lower cost, audit controls, threat  
21 detection, with the understanding that this might  
22 not meet all stakeholder needs, but the federation

1 of data towards discoverability is a step in the  
2 right direction for a lot of rare diseases.

3 With this inverted data-sharing model, it  
4 allows data sharing in an expedited manner, as well  
5 as providing a place for researchers, clinicians,  
6 and biopharma to reposit data after clinical trials  
7 or studies are completed so that data is  
8 accessible. Many years ago, NIH mandated the data  
9 for NIH-supported studies to be a repository for  
10 future research. Can you imagine the power of data  
11 from clinical trials, both successful and  
12 unsuccessful, being shared? It would improve  
13 disease understanding and protocol design in the  
14 future, and the list goes on; but most importantly,  
15 decreasing the time to new drugs and new treatments  
16 for patients. That's really what it comes down to.  
17 Next slide, please.

18 Our platform, in general, enables rare  
19 disease patients to share data at scale.  
20 Researchers can then analyze the data and other  
21 federated data, using integrated tools deployed  
22 within the collaborative work spaces, as well as

1 making data discoverable, linkable, and accessible  
2 to other researchers, clinicians, biopharma,  
3 patients, and communities. Efforts like those of  
4 RDCA-DAP are one of those things that we connect  
5 them to. So we are really proud to have a  
6 partnership with RDCA-DAP, where the data from  
7 RARE-X is consented, and that's where the patients  
8 want their data to be shared, and it's able to be  
9 shared with RDCA-DAP and all of their efforts.

10 We're actually working on a really nice  
11 ontology project right now, where we're mapping our  
12 ontologies that we use at data collection to the  
13 ontologies that RDCA-DAP has historically put on  
14 data after it's been sent to them, so we're really  
15 excited about that. The barriers are lower and the  
16 time to data usage is slashed. Next slide, please.

17 It's important to note that the stakeholder  
18 ecosystem for rare diseases is one where patients,  
19 patient advocates, or organizations are often  
20 drivers of data collection to increase visibility  
21 and knowledge about the disorders. Without their  
22 engagement, many of these communities would be left

1 in the dust. However, the intricacies of data  
2 collection, purpose, and usage to meet all  
3 stakeholder needs to drive that ecosystem, where  
4 each stakeholder is able to play their role, filled  
5 by well-collected and shared data, is really what  
6 we need in this space. Next slide, please.

7 So I mentioned RARE-X a couple times, but  
8 this is actually what we are. We're a program of  
9 Global Genes created to accelerate rare disease  
10 research treatments and cures by removing barriers  
11 for data collection and sharing. We're a platform  
12 to collect, connect, and share data. RARE-X is not  
13 a replacement for any current research or  
14 clinician-sponsored registries, but rather a  
15 prepared collaborator and partner, ready to meet  
16 data where it is and enable access in whatever way  
17 it can compliantly be used.

18 RARE-X recognizes there are many different  
19 places, entry points, and challenges that any one  
20 rare disease can experience, and the approach isn't  
21 necessarily linear when it comes to approaching  
22 data collection. When establishing new efforts and



1 improving on existing efforts, enabling data  
2 sharing via consent and standardized models where  
3 applicable can ensure that data for rare disease  
4 patients is worth their time and effort that they  
5 give to put this data in. There's never been a  
6 better time for patients, researchers, clinicians,  
7 and biopharma to partner on data collection and  
8 sharing to kick-start what needs to happen in the  
9 future for rare diseases, and we're here to help.  
10 Next slide, please.

11 We can provide a platform to help collect  
12 structured patient data, including these  
13 patient-reported data elements that I just talked  
14 about, but we also want to enable open science  
15 platforms to facilitate the sharing of large  
16 high-quality data sets to accelerate therapeutic  
17 research, and a full ongoing patient engagement,  
18 program management, and service to ensure  
19 participation and success for patient advocacy  
20 groups. Next slide.

21 So a big thank you, and happy to answer any  
22 questions. I think we're going to move on, and

1 I'll turn it back over.

2 **Q&A**

3 DR. WINIECKI: Thank you so much.

4 We have run over a little bit. I want to do  
5 just a bit of a concise Q&A with our three  
6 speakers. I'm going to try to throw one question  
7 to each of them, but keep in mind that if you want  
8 to address a different question that you saw  
9 pressing in the chat, in the Q&A box, feel free to  
10 do that.

11 John, the one that stuck out to me that I  
12 was going to throw out to you was how to leverage  
13 real-world data in rare disease clinical trials,  
14 for example, using EMR data, disease registries,  
15 and master observational trials?

16 DR. CONCATO: Wow. Even if we had more  
17 time, I think that's --

18 DR. WINIECKI: I know it's a very broad  
19 question.

20 DR. CONCATO: -- a broad question.

21 DR. WINIECKI: Take that where you want.

22 DR. CONCATO: Okay. The way I would frame

1 an answer is if we have bookends of the spoke on  
2 one side and one size fits all on the opposite end  
3 of the spectrum, I think the key aspect is to  
4 consider where one is in that regard; how much do  
5 we know from prior experience.

6 I think the title of these three talks  
7 together is we're improving the field. We don't  
8 know what will be the highest return on investment,  
9 but we have to be thoughtful. So it's fundamentals  
10 of data quality, appropriate study design, and  
11 regulatory context. C-Path is doing great work.  
12 You heard from Vanessa and their particular  
13 approach. I think we're seeing -- one more  
14 phrase -- a rising tide lifts all boats. So I  
15 don't think I can answer that question except on a  
16 case-by-case basis, but that's where FDA, at some  
17 point in the process, gets involved. Thank you,  
18 Scott.

19 DR. WINIECKI: Sure.

20 Vanessa, I'm going to toss this one to you.  
21 How can advocacy groups support the collection of  
22 patient-reported outcome data in a way that will

1 actually be valued and used?

2           So I take that to mean if someone is  
3 starting a data collection effort, what are some  
4 tips you would give them so that they can get the  
5 maximum use out of that data?

6           MS. VOGEL-FARLEY: Sure. I actually just  
7 was speaking with a patient advocate last night  
8 that started a registry, and when we talked about  
9 it, it's not as simple as saying I'm sending out  
10 questions to families about X, Y, and Z. The way  
11 that you ask your questions, the actual intention  
12 of how you're going to use that data in terms of  
13 research and analysis, needs to be thought of  
14 beforehand.

15           So really, when you're thinking about that,  
16 bring forward - yes-, your community's questions  
17 are great, but then meeting with a researcher or  
18 meeting with the clinicians doing research in their  
19 space to say, now, how do I make this  
20 research-grade? How do I ask the questions in a  
21 non-leading manner? How do I make sure that they  
22 are standardized or led to ontologies that might

1 exist in that space, or existing common data  
2 elements or variables that might exist already?

3 We know that NIH has a massive amount in  
4 this space that you can actually link in to, and  
5 the same thing for HPO. So really making sure that  
6 you're bringing forward what your community wants  
7 to know, but then linking up with somebody who  
8 knows research methods in that space to make sure  
9 that you're evaluating all of those needs as well.

10 DR. WINIECKI: I think that's excellent.

11 For Dr. Walls, how do you entice sponsors to  
12 donate data, either from randomized clinical trials  
13 or real-world data to C-Path, and what are the key  
14 challenges to obtaining and getting data?

15 DR. WALLS: It's surprising easy to  
16 entice -- well, I shouldn't say this. Our  
17 consortium directors are probably like wringing my  
18 neck right now. But we have been very successful  
19 getting sponsors to share data because in rare  
20 diseases, the research community recognizes that no  
21 one organization has enough data to develop  
22 solutions. So if you want to understand the

1 natural history disease, if you want to have an  
2 effective disease progression model against which  
3 you can compare your treatment, you have to  
4 collaborate. So the only way that you're going to  
5 succeed is through sharing data.

6 Even in more common diseases like  
7 Alzheimer's, there are many areas where there is  
8 still no treatment, and the sponsors have been  
9 working on it for decades without coming up with a  
10 solution, and they recognize and they come to us  
11 and say "if C-Path can build this collaboration."  
12 And in some cases, we do need to protect  
13 intellectual property of the sponsors. There are  
14 cases where sponsors will say, "My data can only be  
15 shared within this consortium." The other members  
16 are the only ones that can see it.

17 So that's important, and that does happen,  
18 but that's becoming less and less common. The  
19 data-sharing culture in the world is growing.  
20 Sponsors are recognizing the value of data sharing  
21 not only to themselves, but to the larger  
22 community, and taking part more often.

1           In terms of the biggest challenges in data  
2 sharing, in contrast to what I just said, there's  
3 definitely still an education piece where we need  
4 to explain to sponsors how important it is for them  
5 to share the data and the benefits that we get from  
6 that. A lot of the challenges that I see are  
7 technical around ensuring data are properly  
8 anonymized, understanding what the data mean, how  
9 we reuse the data, and all of the pieces that  
10 Vanessa just talked about in her wonderful  
11 presentation. If we can solve all those challenges  
12 and do everything Vanessa just  
13 said -- please -- with data sharing, my job will be  
14 much, much easier, so thanks, Vanessa.

15           DR. WINIECKI: No, I think it's interesting.  
16 The devil is always in the details. Collecting  
17 data may not be terribly hard to do. You can just  
18 set up an Excel spreadsheet, or whatever, and start  
19 collecting data, no matter what you are talking  
20 about. But when you are talking about integrating  
21 data and organizing data and merging data, it  
22 becomes incredibly complex very quickly.

1           Just in a minute or so, do any of the  
2 panelists have any other thoughts or comments that  
3 they want to throw out before we take a brief break  
4 before Session 2?

5           (No response.)

6           DR. WINIECKI: Okay.

7           Well, in that case, I want to thank John  
8 Concato, Ramona Walls, Vanessa Vogel-Farley, and  
9 Dr. Kerry Jo Lee for contributing to this session.  
10 We'll take a brief break, and we'll be back in  
11 about five minutes for Session 2. Thank you,  
12 everyone.

13           (Whereupon, at 10:32 a.m., a recess was  
14 taken, and workshop resumed at 10:45 a.m.)

15           DR. LEE: Hello, everyone. I'd like to  
16 welcome you back to our second session for day 1.  
17 This has been a wonderful morning, and thank you  
18 all for all of your incredible engagement. We've  
19 really appreciated the questions, and tried to get  
20 through as many of them as we possibly could.

21           I'm just going to introduce our second  
22 session, which is going to be moderated by



1 Dr. Christine Nguyen. She is the Deputy Director  
2 of the Office of Rare Diseases, Pediatrics,  
3 Urologic, and Reproductive Medicine in the Center  
4 for Drug Evaluation and Research, in the Office of  
5 New Drugs at the FDA. Dr. Nguyen joined the FDA in  
6 2005, and in her current role, she provides  
7 important leadership to scientific, clinical,  
8 regulatory, and policy considerations related to  
9 the treatment of inborn errors of metabolism,  
10 including lysosomal storage disorders, organic acid  
11 disorders, and amino acid metabolism disorders.

12 She has served in several leadership roles  
13 prior to her current one at the FDA, including  
14 being the former division director in what is now  
15 the Division of Urology, Obstetrics, and Gynecology  
16 within the Office of New Drugs, and we are very  
17 excited to have you here to moderate the second  
18 session.

19 Thank you, Dr. Nguyen. I'll turn it over to  
20 you to introduce the session and the first speaker.

21 **Session 2 - Christine Nguyen**

22 DR. NGUYEN: Great. Thank you so much,

1 Kerry Jo.

2 Good morning. I'm Christine Nguyen, and I'm  
3 very excited for our workshop today, and you can  
4 see all the topics that will be covered that's so  
5 applicable to what we do at FDA every day.

6 Our first presenter, Dr. Sorin Fedeles, is  
7 the Executive Director of the Polycystic Kidney  
8 Disease Outcomes Consortium at the Critical Path  
9 Institute, and there he oversees the strategic  
10 vision, management, and activities of collaborative  
11 research endeavors with various stakeholders. His  
12 work and leadership related to the therapeutic  
13 development for the treatment of autosomal dominant  
14 polycystic kidney disease, which is the most common  
15 genetic cause of end-stage renal disease, has  
16 spanned over his career, both at C-Path, and while  
17 also in faculty at Yale University School of  
18 Medicine, where he remains affiliated as an  
19 assistant professor.

20 His previous work has led to publications as  
21 first or senior author in multiple well-recognized  
22 peer-reviewed journals, including Nature Genetics

1 and the Journal of Clinical Investigation, and also  
2 multiple grants from the Department of Defense,  
3 NIH, and the PKD Foundation, and several patents.

4 This morning, Dr. Fedeles will present on  
5 the Advancement of Drug Development Tools for  
6 Polycystic Kidney disease As Told Through the PKD  
7 Outcomes Consortium Story. So I'll turn this over  
8 to Dr. Fedeles. Thank you.

9 DR. FEDELES: Thanks so much, Christine.  
10 Can you hear me?

11 DR. NGUYEN: Yes, we can hear you.

12 DR. FEDELES: Perfect.

13 **Presentation - Sorin Fedeles**

14 DR. FEDELES: Good morning, everybody. So,  
15 today I will talk about the advancement of drug  
16 development tools for PKD as told through the PKD  
17 Outcomes Consortium Story. Next slide. So, I'll  
18 give a brief C-Path overview because my colleague,  
19 Dr. Walls, has done a great job talking about  
20 C-Path already, and then I'll talk about PKDOC  
21 background and our impact in terms of drug  
22 development tool advancement and then finally I'll

1 talk about our current project under the new  
2 iteration that we call PKDOC 2.0. Next slide.

3 So, C-Path works as a pre-competitive  
4 neutral player in the drug development space, and  
5 as Ramona has described really well, C-Path brings  
6 together stakeholders, including industry,  
7 academia, foundations, patient advocacy groups, and  
8 regulators and via data and expertise sharing,  
9 focused on areas of unmet need, you know, it  
10 promotes development of tools that can speed up  
11 clinical trials. Our expertise lies at the  
12 intersection of data management, curation,  
13 biomarker development, disease progression  
14 modeling, clinical outcome assessments tool, and  
15 regulatory development.

16 In terms of concentration areas, C-Path is  
17 focused on areas that span neuroscience,  
18 inflammation, infectious diseases, safety sciences,  
19 and rare and orphan diseases. Next slide. In  
20 terms of data sets, as a lot of us say, we're only  
21 as good as the data that we have, and C-Path has  
22 done a great job in accumulating relevant

1 patient-level data sets, ranging from RCT trials to  
2 registries, and as you can appreciate, we've had a  
3 great influx of data in the past few years. So,  
4 currently, we have more than 450,000 subjects as  
5 part of our patient-level databases, with the PKD  
6 consortia having quite a large number of data  
7 points as well. Next slide.

8 In terms of the successes, C-Path has been  
9 around for I guess 18 years now, and we've had a  
10 lot of success in terms of advancing tools and  
11 taking them through regulatory endorsement with  
12 FDA, EMA, and PMDA. The secret sauce here really  
13 is the fact that once these tools are endorsed,  
14 once these actionable solutions are endorsed, they  
15 can accelerate and de-risk medical product  
16 development, and this is key to how we operate and  
17 how we impact, at the end of the day, patient  
18 health. Next slide.

19 So, this is the typical structure of our  
20 consortia at C-Path. I just wanted to provide a  
21 little color. C-Path has an internal team, which  
22 is usually an executive director, project manager,

1 project coordinator, and then we have co-directors  
2 that span usually industry, academia, foundations,  
3 and then we have industry members and academic  
4 members that are part of a certain consortia. And  
5 then we create working groups focused on topics of  
6 interest usually around regulatory endorsement of  
7 tools that address an area of unmet need; so this  
8 is a typical structure or consortia at C-Path.

9 Next slide.

10 This is sort of the microcosm of the greater  
11 C-Path slide that I presented. So, we as a  
12 consortia, again, act at the intersection of the  
13 stakeholders, industry, regulators, academia, and  
14 foundations. What really we do is to convene  
15 stakeholders and to create and build consensus, and  
16 really enable this iterative participation of  
17 stakeholders in order to develop methods and  
18 develop products that impact the efficacy of drugs.  
19 We do this via our neutral convener role in this  
20 larger ecosystem. Next slide.

21 So, ADPKD, as Christine mentioned, is the  
22 most common monogenic disorder, kidney disorder

1 that is. As you can appreciate, the disease is a  
2 very slow progressive disease. You have these  
3 kidney cysts that form as focal outpouchings  
4 derived from kidney tubule cells, and over decades,  
5 really, they grow, kidney volume increases, and you  
6 have this slow destruction of the healthy kidney  
7 tissue while kidney function is maintained via  
8 hyperfiltration for a long time, but then a point  
9 of no return is reached where you have this  
10 precipitous decline in kidney function.

11 In terms of signs, symptoms, and acute  
12 episodes, you have urinary concentrating defects  
13 that occur pretty early in the natural course of  
14 the disease. Hypertension, again, is an  
15 independent risk factor for progression to ESRD in  
16 the context of PKD if it occurs before the age of  
17 35, and then you have, obviously, pain due to the  
18 mechanical stress, and then acute episodes of cyst  
19 rupture, infection, and kidney stones. But as you  
20 can appreciate, the disease is very slow  
21 progressing, where the functional reserves of the  
22 kidney, if you will, are decreasing over time, yet

1 kidney function remains stable for many years.

2 Next slide please.

3 So, in terms of the genetics of the disease,  
4 as I said, it's the most common hereditary renal  
5 disease. It's autosomal dominant while at the  
6 cellular level it's recessive. So basically you  
7 have germline mutation in either PKD1 or PKD2,  
8 which account for the vast majority of cases, and  
9 then you have a somatic second hit that triggers  
10 this cystic transformation and cyst growth over  
11 many years. In terms of prevalence, there are more  
12 than 600,000 people in the U.S. and more than  
13 12-and-a-half million worldwide, and there are no  
14 common or recurrent mutations. Next slide.

15 OK, so based on what I've said so far, as  
16 you can imagine, when people start thinking about  
17 interventions for PKD and possible clinical trial  
18 designs, the natural history of the disease works  
19 against it. So, you have this very slow  
20 progressive disease, heterogeneous presentation,  
21 stable kidney function for many years. So in terms  
22 of designing trials, this meant potentially long



1 trials, and based on the hard endpoints, when  
2 people start thinking about this, they double of  
3 serum creatinine, ESRD, or death, and obviously  
4 this makes for a very challenging proposition.

5 So, very quickly, the unmet need in the  
6 field really revolved around finding clinical  
7 endpoints or accepted surrogates that can measure  
8 disease progression earlier in the course of the  
9 disease, where kidney function is largely  
10 preserved, and obviously that led to the interest  
11 in the development of biomarkers that can be used  
12 in drug development, and in particular, biomarkers  
13 that can stratify patients into fast or slow  
14 progressors; in other words, patients that are more  
15 likely to experience progressive disease or not,  
16 and also biomarkers that can serve as potential  
17 surrogate endpoints for clinical outcomes.

18 So based on what I told you about increasing  
19 kidney size and kidney volume, total kidney volume  
20 came into the spotlight very quickly as a very  
21 potentially relevant biomarker for PKD. So this is  
22 where the genesis of PKDOC came about. PKDOC

1 started as a collaboration among stakeholders in  
2 the field, and the initial mission was to develop a  
3 therapeutic area user guide for PKD to develop  
4 standard common data elements for PKD, and then  
5 work collaboratively to create and integrate a  
6 patient-level database from multiple sources in the  
7 field, obviously from RCT data, which didn't really  
8 exist back then.

9           And then second best was the registry  
10 studies or longitudinal progression studies, and  
11 then use those integrated data sets and obviously  
12 curate them, map them, and then develop  
13 quantitative disease progression models based on  
14 those data, and generate consensus in the field  
15 regarding the utility of total kidney volume as a  
16 biomarker for progression of ADPKD. And finally,  
17 because all of these efforts would not be fully  
18 impactful without having the regulatory endorsement  
19 stamp of approval, obviously the goal was to submit  
20 the qualification package of TKV to the regulatory  
21 agencies in order to create the maximum impact for  
22 stakeholders. Next slide.

1           So PKDOC started by correlating data sources  
2     from academic registries, from the University of  
3     Colorado, Mayo, and Emory, in addition to a  
4     longitudinal observational study that was sponsored  
5     by NIH-NIDDK. As you can appreciate, there were  
6     thousands of patients as part of this registry. It  
7     was more than 10,000, but as the previous panelists  
8     have alluded to, using this type of data has a lot  
9     of challenges, and when PKDOC went through the  
10    effort of curating and mapping this data, only a  
11    subset of patients could be used for this TKV  
12    qualification effort. So out of 10,000-plus  
13    patients, about only 2300 patients could be used as  
14    part of the TKV progression modeling analysis.  
15    Next slide, please.

16           So long story short, after data integration,  
17    mapping, modeling, and iterative regulatory  
18    interactions, PKDOC was able to qualify total  
19    kidney volume as a prognostic enrichment biomarker  
20    with FDA and EMA. This is just a diagram that was  
21    used as part of the qualification package, and  
22    basically, as you can see, irrespective of eGFR

1       either below 50 mL per minute or above, or age  
2       below 40 or above 40, a higher total kidney volume  
3       is essentially correlated with a higher probability  
4       of a 30 percent decline in eGFR. This is exactly  
5       the guidance language that was used as part of this  
6       qualification. To paraphrase, the guidance  
7       provided qualification for the use of TKV at  
8       baseline as a prognostic enrichment biomarker to  
9       select patients with ADPKD at high risk of a  
10       30 percent decline in eGFR. So, this was, again, a  
11       very impactful outcome of this effort because that  
12       meant that TKV could be potentially employed as  
13       part of clinical trials to stratify patients. So,  
14       next slide, please.

15               In terms of the enrichment, this is just a  
16       snapshot taken from the qualification package,  
17       which is partly available. So essentially, when  
18       you use a model without TKV versus a model that  
19       incorporates TKV, you would essentially require  
20       fewer patients to enroll in order to get in one  
21       event, in this case achievement of a 30 percent  
22       decrease in eGFR. So again, if you extrapolate

1 this to a large number of patients, this can  
2 translate into obviously a significant impact in  
3 trial size. So, next slide, please.

4 As these efforts were ongoing to qualify  
5 TKV, again, TKV was deemed as a very useful tool in  
6 the field, and it was incorporated in this  
7 classification's criteria to stratify patients into  
8 classes. This is called the Mayo imaging  
9 classification that takes into account TKV plotted  
10 versus age. Then based on, essentially, the TKV  
11 figures, you can classify patients into classes  
12 from 1A to 1E, with 1E being essentially at the  
13 highest risk of ESRD. So, this is a useful  
14 classification that, again, incorporates TKV as a  
15 tool and can be utilized as part of clinical  
16 development programs. Next slide please.

17 The type of mutation actually became an  
18 employed criteria to stratify patients as well, so  
19 the type of mutation based on PKD1 non-truncating  
20 mutations versus truncating, versus PKD2 mutations,  
21 led to stratification of patients with essentially  
22 the lowest probability of renal survival being seen

1 in patients that have PKD1 truncating mutations  
2 with intermediate probability for PKD1  
3 non-truncating mutations and the highest  
4 probability of survival for PKD2 mutations. So  
5 again, this became just another criteria to  
6 incorporate into patient stratification. Next  
7 slide please.

8 This more recent classification called the  
9 propagated score, essentially utilizes the genetic  
10 stratification that I mentioned, but also  
11 incorporates gender, hypertension events before the  
12 age of 35, urologic events before the age of 35,  
13 and then essentially leads to a more refined way of  
14 stratifying patients based on probability of renal  
15 survival. So again, the field has developed a few  
16 tools to stratify patients. Obviously, this is  
17 very useful and very impactful because this can  
18 potentially be employed as part of clinical  
19 development programs. Next slide, please.

20 In terms of our impact, to summarize, PKDOC  
21 started as an effort to develop a therapeutic area,  
22 as a user guide for PKD, and that led to creation

1 of our patient-level database, and based on those  
2 efforts, those are leveraged to TKV through the  
3 successful qualification process as a prognostic  
4 enrichment biomarker, and more recently in 2018,  
5 TKV was designated as a reasonably likely surrogate  
6 endpoint for PKD. So, in theory, it can be used as  
7 part of an accelerated approval program to utilize  
8 TKV as a primary readout in a phase 3 trial.  
9 Obviously, this accelerated approval paradigm  
10 requires an acceptable plan for a postmarketing  
11 confirmatory trial. Next slide, please.

12 So the lessons learned as part of these  
13 efforts really were that even though TKV had been  
14 employed as part of the development programs, the  
15 qualification effort quantified the amount of  
16 information that was added by essentially using TKV  
17 as an original prognostic biomarker. And again,  
18 this qualification, per se, has served as a  
19 stepping stone to meaningful iterative discussions  
20 in the field with regulators about the use of TKV  
21 as a reasonably likely surrogate endpoint, and  
22 taking it beyond that as a potential surrogate

1 endpoint for approval.

2 And the lessons that we learned in terms of  
3 using registry data is that, yes, registry data can  
4 be critical for establishing the value of a  
5 biomarker as a tool in drug development, as we did  
6 in TKV, with obviously inherent challenges when it  
7 comes to curating the data, to mapping it, and to  
8 generating relevant analysis data sets. Next  
9 slide, please.

10 In terms of our current effort under the  
11 iteration that we call PKDOC 2.0, -- next slide  
12 please -- our efforts are focused on three main  
13 areas right now. We are keenly aware of the need  
14 to continue data-sharing efforts for PKD and  
15 working with our close stakeholders for that. We  
16 are very focused on refining the TKV modeling that  
17 we had worked on before and developing a clinical  
18 trial simulator tool that, again, can be taken  
19 through regulatory endorsement and become a  
20 stepping stone as part of clinical development  
21 programs.

22 We are also very interested in identifying



1 novel biomarkers of disease progression or drug  
2 response that go beyond TKV, and the third topic is  
3 taking a patient-centric approach to both ADPKD and  
4 the recessive form of PKD, and essentially  
5 generating patient concepts and building PRO tools  
6 that can become part of clinical development  
7 programs as well. Next slide, please.

8           So turning to data sharing, I just wanted to  
9 stress just how important it is, and it is really  
10 the bedrock of everything that we do and that a lot  
11 of other organizations do. Why is it important?  
12 Data sharing impacts every stakeholder in the  
13 field. It impacts academia by improving research,  
14 by understanding disease course or variance. It  
15 impacts industry by being able to design more  
16 effective clinical trials and by understanding and  
17 developing biomarkers. And again, at the end of  
18 the day, it impacts patients, and this is the most  
19 important, and it allows faster drug development.  
20 Again, it allows collaborations and allows  
21 cross-pollination of ideas in order to drive tools  
22 that impact, at the end of the day, patient health.

1 Next slide, please.

2 In terms of the modeling clinical trials  
3 simulator tool project, again, as I have mentioned  
4 already, we have a pretty large patient-level  
5 database of registered data, and we have been very  
6 keen to acquire other types of data sets, and in  
7 particular, RCT data sets. We have acquired HALT,  
8 ALADIN, and TAME data sets, and we continue to work  
9 with our industry partners to acquire industry-led  
10 RCT type data.

11 What do we do with this data? My colleague,  
12 Dr. Walls, has already gone through this in a  
13 different context, but we integrate this data, and  
14 we use our competencies in data curation and  
15 mapping in order to standardize the data and to  
16 feed it through our modeling pipeline that is run  
17 by our quantitative medicine program.

18 And, what do we do with it? We build models  
19 that are essentially the bedrock of clinical trials  
20 simulated tools that can be taken through  
21 regulatory endorsement, and that's really the key  
22 to success here, going through this entire process,

1 including the endorsement process, in order to have  
2 the most impact for our stakeholders. Next slide,  
3 please.

4 And again, for our CTS model output, the  
5 model is intended to be used in clinical trials in  
6 order to model disease progression and in order to  
7 model trial components or drug effects. At the end  
8 of the day, the impact of this tool is really at  
9 the level of being able to have a better handle, a  
10 more refined handle, on the inclusion/exclusion  
11 criteria, enrichment strategies, trial duration,  
12 and size, but also this tool can serve as the  
13 bedrock of supporting the design of the accelerated  
14 approval progress for PKD. Next slide, please.

15 Again, this is just a snapshot of what a  
16 simulator for PKD would look like. This is our  
17 Alzheimer's clinical trial simulator tool. I'm  
18 just giving you a snapshot. I don't want to  
19 comment too much on this, but again, at the end of  
20 the day, this tool would be publicly available, and  
21 sponsors would be able to utilize that as part of  
22 their development programs. Next slide, please.

1           I just wanted to touch upon PRO-focused  
2 approaches because I know Caitlin, the next  
3 speaker, will talk about that. Another avenue of  
4 high interest to PKDOC right now is to take a  
5 patient-focused approach to inform medical product  
6 development. As I said, both the dominant and  
7 recessive form of PKDs are areas of unmet need and  
8 of interest to us, and currently we're using the  
9 recessive form of PKD as a case study for  
10 organizing an externally-led patient-focused drug  
11 development meeting. Next slide, please.

12           The objectives of this meeting, which is  
13 essentially the first step in gathering patient  
14 concepts and, down the road, building PRO tools for  
15 ARPKD, the objectives are to collect the patient  
16 and family experience of living with ARPKD; to get  
17 information regarding the factors that influence  
18 patients' decision making with regards to entering  
19 clinical trials; and also to gather concepts  
20 regarding the medical management of ARPKD and the  
21 experience that family and caregivers have  
22 regarding treatments and aspirations for new

1 treatments. Again, in terms of the benefit, I  
2 don't want to stress that this benefits, obviously,  
3 patients, and this is why we are doing it, but also  
4 this benefits the entire stakeholder ecosystem,  
5 including industry, patient advocacy groups, and,  
6 obviously, regulators. Next slide, please.

7           So, in terms of the value that C-Path and  
8 PKDOC brings to the stakeholders, via our drug  
9 development tool processes, we can achieve a better  
10 understanding of disease and application of  
11 biomarkers across stakeholders. We can implement  
12 biomarkers in clinical trials, accepted under IND  
13 versus qualified, obviously. We can stratify  
14 patients, and we can build disease monitoring  
15 biomarkers that, obviously, eventually can lead to  
16 efficient clinical trials and faster approvals.  
17 And most importantly, we can change a patient's  
18 journey, and we can take a precision medicine  
19 approach to be more successful and more impactful  
20 with our drug development programs.

21           I think that's my last slide, so I want to  
22 thank everybody for their attention.

1 DR. NGUYEN: Great. Thank you so much for  
2 an excellent presentation, and we certainly have  
3 some questions in our chatbox that we'll try to  
4 answer.

5 I'm very happy to present our second  
6 presenter for this session, Dr. Caitlin Nichols.  
7 She is the Director of Research at AllStripes  
8 Research, a medical data science company with the  
9 mission of accelerating new treatments for people  
10 impacted by rare disease. In this role,  
11 Dr. Nichols oversees scientific communications and  
12 the design and execution of real-world data  
13 research partnerships with industry, academic,  
14 government, and patient advocacy groups  
15 stakeholders.

16 Prior to her current position, Dr. Nichols  
17 was a scientific curator on the Product Science  
18 Team at 23andMe, where she assisted in the  
19 development and improvement of carrier status and  
20 genetic health risk reports. She received her PhD  
21 in Biological and Biomedical Sciences from Harvard  
22 University, where she studied novel cancer

1 therapeutic approaches, leveraging copy number  
2 changes in cell-essential genes. This morning,  
3 Dr. Nichols will present on Leveraging Patient  
4 Engagement and Real-World Data to Inform Rare  
5 Disease Drug Development.

6 Dr. Nichols, I'll hand this over to you.  
7 Thanks.

8 **Presentation - Caitlin Nichols**

9 DR. NICHOLS: Thank you so much for the  
10 introduction and to the organizers for the  
11 opportunity to speak, and thank you to Sorin for  
12 that insightful presentation as well. Today, I'll  
13 be discussing some use cases from our work at  
14 AllStripes and insights that we've learned about  
15 how we can leverage patient engagement and real-  
16 world data to inform rare disease drug development.  
17 Next slide, please.

18 Now, all of us here today are familiar with  
19 the unfortunate reality that far too few orphan  
20 drugs are approved each year. This is despite  
21 advances in technology that, in theory, should help  
22 to accelerate this space; for example, the decrease

1 in sequencing costs and improvements in gene  
2 editing technology that should expand the field of  
3 preclinical programs. However, despite all of the  
4 wonderful work that's been done by advocacy  
5 organizations, academic investigators, and industry  
6 investigators, only 20 rare disease drugs were  
7 approved last year. Next slide, please.

8 We're also familiar with the challenges  
9 facing those involved in rare disease drug  
10 development. As we know, patient populations are  
11 small and geographically distributed, and  
12 frequently, these conditions are complex and  
13 require care from many different specialties across  
14 different institutions. These factors can lead to  
15 a scarcity of high-quality data, which can then  
16 make it challenging for us to understand how the  
17 disease progresses, and impacts both patients and  
18 the healthcare system.

19 Frequently, it's challenging to identify  
20 appropriate outcome measures in rare conditions,  
21 and this and other reasons can make it very  
22 challenging to plan and execute effective clinical



1 trials for orphaned conditions. Finally, and most  
2 critically, forming deep and authentic  
3 relationships with patient communities is  
4 absolutely critical in rare disease, perhaps more  
5 so than in any other indication. Next slide,  
6 please.

7 One tool in our toolkit to address these  
8 challenges in rare disease drug development is  
9 real-world data, which is data that's collected  
10 outside of the confines of the clinical trial.  
11 This is what we focus on at AllStripes, and real-  
12 world data can help to address challenges in rare  
13 drug development across the life cycle.

14 So beginning in preclinical stages, starting  
15 to understand what is the unmet need in this  
16 condition; and moving into planning and executing  
17 clinical trials, what is the patient journey from  
18 when they're diagnosed through to management in the  
19 healthcare system, and who are the patients? What  
20 are their characteristics at a baseline, and how  
21 can we design a clinical protocol that makes sense  
22 and is feasible? Then moving into approval and

1 launch, how is the product being used out in the  
2 real world? What's its safety and effectiveness in  
3 the real world?

4 Now, all of these questions are things that  
5 can be addressed with real-world data, but -- next  
6 slide, -- today I'm just going to focus on the uses  
7 of real-world data for the planning and execution  
8 of clinical trials. Next slide, please. There are  
9 a variety of sources of real-world data, from  
10 claims and structured EHR databases, to  
11 unstructured clinical notes, and patient-reported  
12 or patient-provided data such as surveys or data  
13 from wearables. All of these sources of data can  
14 be very valuable, but they do have gaps. Next  
15 slide, please. And so it's our view that  
16 integrating the patient voice is really critical to  
17 developing a robust real-world data strategy and  
18 filling in these gaps, these four big questions  
19 that I'll refer to as the what, who, where, and  
20 when, in rare disease drug development. Next  
21 slide, please.

22 So what are these big questions? First of

1 all, who? Who are these patients? What is the  
2 population like at a baseline, and what would be  
3 feasible I/E criteria for the trial? Next, what  
4 and when? What are the patients experiencing, and  
5 at what point in their patient journey? This can  
6 help us characterize the unmet need faced by these  
7 communities and determine the appropriate outcomes  
8 and endpoints that are needed for a trial. And  
9 finally, where? Where are the patient's  
10 geographically, so we can identify suitable trial  
11 sites, but also socially and culturally, so that we  
12 can identify appropriate recruitment approaches.  
13 Next slide, please.

14 This is where AllStripes lives, is at the  
15 nexus of patient engagement and real-world data  
16 generation. Patients and caregivers can sign up to  
17 our platform and consent to participate in research  
18 in minutes. This research consent is an umbrella  
19 consent that allows for the use of de-identified  
20 data for minimal risk research, including survey  
21 collection, as well as participant recontact over  
22 time.

1           Our team then collects, structures, and  
2 analyzes multimodal clinical data from a variety of  
3 sources from across the patient journey at no cost  
4 to the participants, and then we use the structured  
5 and analyzed data to help pharmaceutical companies  
6 answer some of these big questions that are  
7 potentially blocking their drug development  
8 programs. In addition, we provide participants  
9 with ongoing research insights and other features  
10 to assist them in their rare disease journey.

11           So today, the case studies that I'm going to  
12 discuss are based on our learnings from collecting,  
13 analyzing, and working with partners to use these  
14 data to help their clinical programs. And while  
15 the case studies I'm going to share are anonymized,  
16 I'm hopeful that they'll be helpful as you think  
17 about your own clinical development programs. Next  
18 slide, please.

19           So the first case study that we'll start  
20 with is a question of who, what, and when, and  
21 we'll be discussing characterizing the unmet need  
22 and the patient journey in a rare pediatric

1 epilepsy. Next slide, please. In this case study,  
2 we worked with a sponsor that was a biopharma  
3 company preparing their IND application for a  
4 product to treat a rare severe pediatric epilepsy,  
5 with seizures beginning in infancy. The challenge  
6 in this condition is that there was really a lack  
7 of understanding of the natural history and  
8 progression of this condition, and in order for the  
9 sponsor to better inform their clinical trial  
10 design, they needed to better understand the  
11 patient journey.

12 So our solution was to work with this  
13 sponsor to develop a natural history study to  
14 better understand the needs of the patient  
15 community and to help inform their outcome and  
16 endpoints selection, and we did this both through  
17 participant surveys, as well as through abstracting  
18 clinical data from participant medical records.

19 You can see from the statistics there at the  
20 bottom, particularly the bottom-right, over  
21 12,000 individual data points were abstracted for  
22 this program for the cohort of less than

1 40 participants. So it was really a tremendous  
2 amount of data characterizing patients with this  
3 pediatric epilepsy. Next slide, please.

4 This slide shows one of the first steps that  
5 we do as part of our natural history study  
6 development, and this is doing a patient journey  
7 map. We create these journey maps by doing a deep  
8 comprehensive dive into the medical records of a  
9 small number of participants from as far back as  
10 their clinical history goes, to birth in this case  
11 for the pediatric patient, and looking at all of  
12 the different types of clinical documents across  
13 the spectrum of care, and we pull out clinical  
14 information and information about their journey,  
15 really placed in context, so that we can understand  
16 not just what was happening but how it related to  
17 other events in the patient's journey.

18 For example, here you can see that we have  
19 the birth notes for this patient. They had a  
20 normal newborn screen, but shortly after that, they  
21 presented to the NICU for seizures, and then they  
22 started on their first antiepileptic drug. Shortly

1 thereafter, they had the first of many AED regimen  
2 changes. They were eventually referred to  
3 therapies and had genetic testing ordered. Then in  
4 blue there, you can see that the causative variant  
5 was identified, and they were diagnosed with this  
6 rare epilepsy.

7 We can then track over time additional  
8 symptoms as they present, for example,  
9 developmental delay, hypotonia, and GI and sleep  
10 issues. We can look at assistive devices that  
11 patients need, for example, here, a G-tube,  
12 monitor; non-pharmacologic interventions, for  
13 example, a ketogenic diet. Testing results are  
14 shown by the normal EKG and audiology and the  
15 abnormal swallow study, and then ultimately we see  
16 that this patient was placed on an investigational  
17 drug for this condition.

18 So while this is a zoomed-out view of one of  
19 these patient's journey maps for the purposes of  
20 protecting participant privacy for this  
21 presentation, you can see that this is really a  
22 tremendous amount of data in its very deep and

1 comprehensive way. Of course, this is something  
2 that we would love to have for each and every  
3 participant in one of our studies, but frequently,  
4 due to resourcing, that may not be possible.

5           So when we work with sponsors, one of the  
6 ways that we leverage these journey maps is by,  
7 again, doing them on a small number of patients to  
8 get this very deep and broad picture of what  
9 patients are experiencing, and then we leverage  
10 those learnings to carry them into designing our  
11 structured data capture for a broad swath of data  
12 elements that will be collected from the full  
13 cohort; and in that way, we're kind of able to get  
14 the best of both worlds.

15           Now, despite the depth of clinical  
16 information here, what's missing is the patient  
17 voice and really understanding how the condition  
18 impacts participants and their families. Next  
19 slide, please. One of the ways that we can address  
20 this is through PROs or surveys, and one of the  
21 things that we do is surface a survey to every  
22 participant on our platform about their symptoms,



1 when their symptoms first started, what was the  
2 first symptom, and what's the symptom that most  
3 impacts their quality of life?

4 In this condition, when we surveyed the  
5 participants, we weren't surprised at all to see  
6 that the first symptom for the majority of  
7 participants was seizures. This is what we would  
8 expect. However, when the caregivers were asked  
9 about the symptom that most impacted their quality  
10 of life, half of them indicated that developmental  
11 delays was the most impactful symptom, even more so  
12 than seizures, and this is something that we  
13 wouldn't have known or necessarily expected without  
14 surveying the families. So again, this really  
15 underscores the importance of marrying not just the  
16 deep clinical data, but also the voice and the  
17 experiences of the patients and families to  
18 understand the unmet need to be addressed in a  
19 future clinical trial. Next slide, please.

20 This slide shows another example of how  
21 we've collected this data in one of our rare  
22 conditions. This is dermatomyositis, which is a

1 rare inflammatory myopathy, and you can see that  
2 when we asked these participants about the symptom  
3 that most affects their quality of life, the  
4 answers were much more heterogeneous than what we  
5 saw for the pediatric epilepsy. This survey is  
6 something that, as I mentioned, we've surfaced to  
7 all participants on our platform that are consented  
8 to participate in research. More than 800 across  
9 46 conditions have completed this survey, and this  
10 is an effort that we want to continue to deepen and  
11 expand on over time. Next slide, please.

12           Next, we'll move into a case study  
13 addressing questions of who, what, and when, and  
14 this is characterizing the patient population in a  
15 rare metabolic condition. Next slide, please. In  
16 this case, the sponsor was a research institution  
17 exploring commercialization. They were still in  
18 the preclinical stages of development, and they  
19 were working on a condition that's a rare inborn  
20 error of metabolism. The challenge in this  
21 condition is that there's a lack of understanding  
22 of how it manifests, including neurological signs

1 and behavioral symptoms that begin in childhood,  
2 and future clinical trials will require appropriate  
3 instruments for measuring these symptoms.

4 To address this problem, we partnered both  
5 with the sponsor, as well as with the main advocacy  
6 group in this space, to design a natural history  
7 study about this condition. The reason why we  
8 partnered both with the sponsor, as well as with  
9 the advocacy group in the actual design of this  
10 study was that it was absolutely critical for us to  
11 know what we needed to capture. Because of this  
12 condition, and the nature of the signs and  
13 symptoms, there's information about the condition  
14 that only the families and the caregivers would  
15 know when these symptoms are happening, what types  
16 of symptoms are happening, so we don't just need  
17 their help to collect the data, but even to set the  
18 foundation for where we need to start; what's the  
19 data that we need to collect? So in partnership  
20 with these two stakeholders, we executed clinical  
21 data abstraction from participant medical records,  
22 as well as surveys. Next slide, please.

1           This slide gives an overview of how we  
2 developed one of the instruments that we used in  
3 this study to measure behaviors of the  
4 participants. First, the sponsor and the advocacy,  
5 KOL from the patient advocacy group, co-developed a  
6 comprehensive list of behavioral symptoms and  
7 associated data that were of interest for the  
8 natural history study. Next, our team developed  
9 and tested a survey instrument on our proprietary  
10 patient platform with feedback from both the  
11 sponsor and the advocate, KOL.

12           Next, we piloted the instrument to a small  
13 group of participants who provided feedback on  
14 content, language, and presentation, and then we  
15 surfaced the survey to all participants in the  
16 study so that they could take the survey if they  
17 chose, and we did this longitudinally to track  
18 response consistency and disease progression over  
19 time. Next slide, please.

20           This is a high-level overview of the  
21 instrument that we developed. The results from  
22 this survey are still being analyzed and written

1 up, so I can't go into too much detail, but just to  
2 give you an idea of what we did here, we started  
3 with nine different behavior categories -- they're  
4 on the left -- and for each of these behavior  
5 categories, there were specific behaviors nested  
6 underneath them.

7           If we go to the next slide, we'll see an  
8 example. The first behavior category was physical  
9 aggression, and there were four specific behaviors  
10 we were interested in learning more about: hitting  
11 or kicking, scratching, biting, and grabbing. For  
12 each of the next behavior categories, there were  
13 behaviors nested under them, so a total of  
14 33 specific behaviors that we were interested in  
15 learning about in this survey. Next slide, please.

16           We also had another behaviors category at  
17 the bottom, where caregivers could provide  
18 free-text information on symptoms that maybe we  
19 hadn't thought to include in the survey, and then  
20 for each of these behaviors, we asked a variety of  
21 questions, for example, about age of onset,  
22 triggers of the behavior, and behavior frequency.

1 Next slide, please.

2 So what did we learn? We found that,  
3 broadly, the results of the survey were consistent  
4 with what has been reported in the literature, and  
5 we also saw the value of engaging the caregivers in  
6 developing this instrument. For example, across  
7 three different categories, we found that there  
8 were additional behaviors that we hadn't thought to  
9 include in the original instrument, for example,  
10 one additional physical aggression behavior and a  
11 couple of other additional behaviors in these two  
12 other categories, Category 4 and Category 8. Next  
13 slide, please.

14 Looking at the other behaviors that were  
15 surfaced to us in the free text responses, we found  
16 that there was actually an additional behavior  
17 category involving eating and feeding behaviors  
18 that we hadn't previously thought to include in the  
19 behavior survey. In addition, there were at least  
20 three behaviors that didn't fit cleanly into an  
21 established category, so both of these findings  
22 were things that can be carried into future

1 development of this instrument for potential use in  
2 future clinical trials. Next slide, please.

3 Just returning to the beginning here,  
4 speaking about this case study, as you could  
5 probably tell from the overview of that survey, it  
6 was quite a lengthy survey. The median time to  
7 completion was about 20 minutes, and it asked about  
8 some challenging issues for the families and  
9 caregivers, and yet we had a tremendous amount of  
10 engagement on this survey.

11 For a cohort of less than 30 participants,  
12 we collected over 2500 individual survey data  
13 points and, really, I think that the reason why the  
14 families were so engaged and willing to participate  
15 is not just because they understood the importance  
16 of this to furthering clinical development for  
17 their loved one's condition, but also because we  
18 had involved them from the very start, informing  
19 the foundation of the study, so they knew that this  
20 would be a valuable use of their time because they  
21 had been given a voice in what was being collected.  
22 In addition, we returned interim results to the

1 community during the process of survey collection  
2 to let them know about what we were finding and  
3 help them understand the potential impact of their  
4 participation. Next slide, please.

5 We'll go into a little bit more of a  
6 logistical section, in this case, answering who,  
7 evaluating I/E criteria for trials, and this  
8 insight selection is particularly important because  
9 some estimates state that at least a quarter of all  
10 rare disease clinical trials fail as a result of  
11 challenges with recruitment. So getting these  
12 right from the outside is really important as we  
13 plan clinical programs. Next slide, please.

14 For this study, we worked with a  
15 biopharmaceutical company that was in the middle of  
16 their pivotal trial, and this was in a rare adult  
17 onset autoimmune neuropathy, and the challenge here  
18 was really recruiting participants for this large  
19 multisite trial. So our approach for addressing  
20 the sponsor's need was prescreen participants that  
21 consented on our platform using data collected from  
22 their medical records. We started with



1 132 consented participants; 112 of those went  
2 through the prescreening process, and ultimately  
3 fewer than 5 patients ultimately passed the  
4 prescreen, and were given the option to be  
5 connected to the study site.

6 Now, you may think, well, that's a pretty  
7 small number. Why are you using this as a case  
8 study about I/E criteria? Next slide, please. And  
9 really, I share this to underscore the importance  
10 of thinking carefully about I/E criteria,  
11 particularly in rare disease clinical trials, so  
12 I'll share first the top medical reasons that  
13 patients failed the prescreen.

14 The first was for a diagnosis of diabetes.  
15 This is, of course, a common condition;  
16 1-in-10 Americans have a diagnosis of diabetes.  
17 This is a population typically of middle-aged to  
18 older adults, so already a higher likelihood of  
19 having a diabetes diagnosis, but diabetes is also a  
20 known comorbidity in this condition with  
21 15 to 20 percent of individuals living with this  
22 condition also having a diabetes diagnosis. So,

1 ultimately, 9 patients were screened out initially  
2 because of a diabetes diagnosis. Next slide,  
3 please.

4           The second most common medical reason for  
5 failing prescreening was a history of malignancy;  
6 again, a very common diagnosis; 1-in-2 people in  
7 the U.S. will have a cancer diagnosis over their  
8 lifetime but, again, as this is a population of  
9 middle-aged and older adults, they're more likely  
10 than the general population to have had a cancer  
11 diagnosis at some point in their medical history.

12           So these numbers, since these are only  
13 17 patients, this may look relatively small  
14 compared to the 112 that were screened, but the  
15 point that I'd like to make here is that these are  
16 just a subset of the exclusion criteria for this  
17 trial. This trial had at least 10 different  
18 exclusion criteria, each of which resulted in  
19 patients being screened out, and I haven't included  
20 the smaller numbers, again, in the interest of  
21 protecting participant privacy.

22           But when we're working in rare disease,

1 every potential participant counts, so this is not  
2 to say that these I/E criteria were inappropriate  
3 for the condition. They may well have been  
4 appropriate and should have been included, but this  
5 is just the importance of really thinking carefully  
6 about the characteristics of the population and  
7 whether these I/E criteria are going to be  
8 feasible, based on the sample size that you need  
9 and the underlying characteristics of the  
10 population that you're working with. Next slide,  
11 please.

12           Next, we'll move into a discussion of the  
13 where, identifying appropriate trial sites. Next  
14 slide, please.

15 Zooming out, we surfaced across all participants on  
16 our platform a survey about past clinical trial  
17 participation, as well as interest in participating  
18 in a future clinical trial, and more than  
19 450 participants took this survey. We found that  
20 nearly three-quarters of participants have not yet  
21 been involved in a clinical trial, but about  
22 three-quarters of participants are either extremely

1 or very interested in participating in a future  
2 clinical trial. Next slide, please. But when we  
3 asked participants what would be the biggest  
4 barriers to them participating in a trial, the most  
5 common answer was distance to a potential study  
6 site.

7 While we knew that this is something that  
8 would be a barrier to participants, I was surprised  
9 that this was the most common answer, even above  
10 potential risks of study participation or negative  
11 side effects of the experimental treatment. So  
12 this really underscores the importance to potential  
13 participants of this travel burden piece of  
14 enrolling in a trial. Next slide, please.

15 The magnitude of this burden is underscored  
16 by some analyses that we did of participants on our  
17 platform. This is across 900 participants in  
18 36 different conditions, and this was done in the  
19 fall of 2021. We took each participant and  
20 determined the distance from their resident  
21 zip code to the nearest trial site in their  
22 condition, both for interventional and

1 observational trials, and then we bucketed the  
2 patients into condition categories, and took the  
3 median distance among those patients, and that's  
4 what you see here in the graph.

5 For example, if we look at the other  
6 systemic category in the navy blue, the  
7 middle-of-the-pack patient would have to travel  
8 more than 800 miles to get to the nearest  
9 interventional trial site in their condition, a  
10 tremendous distance. And even in the conditions  
11 with the lowest travel burden, here, for example,  
12 tumor and lymphatic conditions and epilepsy  
13 conditions, the middle-of-the-pack patient would  
14 still have to travel more than 100 miles to get to  
15 the nearest trial site. So what are some ways that  
16 we can address this using real-world data? Next  
17 slide, please.

18 I'm going to return for a moment back to the  
19 case study of the company that was recruiting for  
20 the pivotal trial in the adult onset autoimmune  
21 neuropathy, and as I mentioned, fewer than  
22 5 patients passed the prescreen and were given the

1 option to be forwarded to a clinical site. And  
2 what I didn't mention is that 40 participants  
3 actually dropped out of the prescreen because they  
4 were too far from any of the trial sites that the  
5 sponsor had set up, so that was a major barrier to  
6 patients participating. But there are some ways  
7 that we can think about addressing this if we go to  
8 the next slide.

9 Starting in November of 2021, we had  
10 71 participants in this condition on the platform.  
11 At the time, there were six different clinical  
12 trials in this condition, with 15 trial sites  
13 across all of them. So looking here, we can see  
14 that more than 55 percent of participants at the  
15 time lived at least 200 miles from the nearest  
16 trial site. We wanted to try to find patients that  
17 were less than 200 miles from a trial site, and we  
18 were involved in targeted recruitment within  
19 200 miles of those trial sites for the trial that  
20 we were helping to recruit for. During that time  
21 as well, 10 trial sites were added across all of  
22 the six different trials that were ongoing. Next

1 slide, please.

2 By February of 2021, we had 111 consented  
3 patients on the platform. There were still  
4 6 trials happening in this condition, but there  
5 were now 25 sites spread across those six different  
6 trials. And as a result of our targeted  
7 recruitment, as well as the addition of these trial  
8 sites, we saw that about two-thirds of participants  
9 were now less than 200 miles from the trial site.  
10 And if we go to the next slide, this is a  
11 57 percent increase right where we want the  
12 patients to be, either a short or an intermediate  
13 distance from the trial site.

14 So while many of the sites had been  
15 established prior to us becoming involved in this  
16 project, there are ways to address challenges, for  
17 example, by engaging in targeted recruitment once  
18 you've actually selected the sites. But are there  
19 ways that we can better inform site selection ahead  
20 of time to kind of get around some of these issues?

21 If we go to the next slide, we see an  
22 example in our lysosomal storage disorder cohort.

1 This is an analysis that we did across 9 lysosomal  
2 storage disorders, 151 participants in total, and  
3 this heat map shows the geographic distribution of  
4 these patients by U.S. census divisions. Next  
5 slide, please. We wanted to identify prospective  
6 centers of excellence for lysosomal storage  
7 disorders. Some conditions do have them, but  
8 others don't under this umbrella of LSDs, so to do  
9 this, we evaluated care centers based on four  
10 different criteria.

11 First, did they have multidisciplinary care  
12 teams? Next, had they participated in at least one  
13 peer-reviewed publication in an LSD in the past?  
14 Third, had they hosted a clinical trial in the past  
15 in a lysosomal storage disorder? And then finally,  
16 did they have a metabolic genetics clinic?

17 When we performed this analysis, we found  
18 54 centers met all four of these criteria, and  
19 22 centers met three of the criteria. We can  
20 notice, in particular, that there's a relative  
21 dearth of these prospective centers of excellence  
22 in the Rocky Mountain region, as well as in the



1 Upper Midwest, and portions of the Southeast United  
2 States. Next slide, please.

3 Just how far would participants on our  
4 platform have to travel to get to one of these  
5 prospective centers of excellence, either for care  
6 or for participating in a clinical trial? Here we  
7 took, again, the distance from where the patient  
8 resides to the nearest prospective center of  
9 excellence, and then this box plot shows the  
10 distribution of those values.

11 Here, the middle-of-the-pack patient would  
12 have to travel almost an hour and 45 minutes to get  
13 to the nearest center of excellence and  
14 nearly 100 miles. This represents more than  
15 4 times the travel time that the average American  
16 had to travel for healthcare in the year 2000 and  
17 more than 9 times the travel distance that the  
18 average American had to travel for healthcare in  
19 the year 2000; again, just to underscore how  
20 potentially burdensome this is, even with going  
21 just to the nearest center that we've identified.  
22 Next slide, please.

1           We also wanted to understand if this travel  
2 burden varied by region of the country. As I  
3 mentioned, we saw that there were some pockets of  
4 the country that seemed to lack prospective centers  
5 of excellence, so we did the same analysis where we  
6 found the shortest distance from the patient to a  
7 center of excellence, and then bucketed the  
8 patients by region, and we showed here the median  
9 distance of the patients in each region.

10           We can see that patients in the west-north  
11 central -- that's the upper dark teal Midwest  
12 region -- the east-south central -- that's the  
13 purple region there in the southeast United  
14 States -- and the mountain region -- that sort of  
15 median teal color -- have the highest travel  
16 burden.

17           So while this may not be too surprising  
18 based on population distribution and geography, the  
19 LSD patients on our platform that live in those  
20 three regions account for nearly a quarter of all  
21 participants in our cohort. And as mentioned  
22 previously, every single participant counts, so

1 what are ways that we could potentially address  
2 this?

3 Aside from identifying these centers of  
4 excellence, perhaps it's worth looking into if  
5 there are other care settings where trials could be  
6 administered for these patients. For example, are  
7 their community settings that would be equipped to  
8 host a trial site to help diminish some of this  
9 travel burden? Next slide, please.

10 Another potential solution is brought to  
11 light by an analysis that we performed, a survey  
12 where we asked patients about their use of  
13 telehealth and their attitudes toward telehealth  
14 during the COVID-19 pandemic. More than  
15 700 patients on the platform responded to this  
16 survey, and 78 of those participants had an option  
17 to participate in telehealth and had used  
18 telehealth on at least one occasion.

19 Of those 700 participants, 74 percent of  
20 participants indicated a preference for telehealth,  
21 either whenever possible or at least for some types  
22 of appointments. And while telehealth and virtual

1 trials aren't necessarily a one-to-one, we believe  
2 that this may indicate an openness on behalf of  
3 rare disease patients to participate in sightless  
4 trial models. There are many organizations that  
5 are innovating in this space, and we encourage that  
6 continued innovation.

7 Obviously, one solution, virtual trials or  
8 targeted recruitment, is not going to be the  
9 cure-all for the challenges of diminishing travel  
10 burden for participants but, again, just being  
11 aware of these different options and the importance  
12 of making trials feasible for patients, and not  
13 just that they can be enrolled, but also to  
14 diminish the number of patients that are lost to  
15 follow-up over time. Next slide, please.

16 If there are a couple of things that I would  
17 want you to take away from the presentation today,  
18 the first is that real-world data can help to  
19 address the challenges that are inherent in orphan  
20 drug development, and there are gaps in real-world  
21 data, and it's our view that integrating the  
22 patient voice is critical to answering these big

1 questions in drug development, particularly when it  
2 comes to trial planning.

3           Who are the patients at a baseline? What's  
4 the characteristics of the population? What are  
5 they experiencing, and when? What are the most  
6 impactful outcomes for us to address with a trial?  
7 And finally, where are the patients? How can we  
8 make trial sites and recruit patients in a way that  
9 makes sense so we can meet these recruitment goals?  
10 Next slide, please.

11           I'd like to end, of course, with the reason  
12 why we do what we do, which is the patients and  
13 families impacted by rare disease. It's our  
14 mission at AllStripes to accelerate treatments for  
15 these folks, and moving forward from these case  
16 studies that I've shared, we are going to double  
17 down on how to further incorporate the voice of the  
18 patients to empower them, to provide data that can  
19 then help to accelerate treatment for their  
20 diseases and the diseases of their loved ones.

21           Thank you so much for your time and  
22 attention, and I'm happy to take questions, and I'm

1 looking forward to the discussion.

2 **Q&A**

3 DR. NGUYEN: Thank you so much, Caitlin.  
4 That was outstanding; such great information.

5 I thank Drs. Fedeles and Nichols for sharing  
6 their impactful insights on how to optimally  
7 leverage data collected from rare disease patients  
8 to inform drug development in that space.

9 At this time, we'll transition to the panel  
10 discussion, where it's going to be a short panel  
11 discussion because we're running out of time. I  
12 just want to briefly introduce Dr. Aliza Thompson,  
13 who is the Deputy Director of the Division of  
14 Cardiology and Nephrology at the FDA, that oversees  
15 therapeutic development for the treatment of  
16 cardiovascular and kidney disease. She has been  
17 with the agency since 2007 and has been widely  
18 recognized for her significant contribution to  
19 public policies to improve outcomes for patients  
20 with renal disease.

21 Thanks for joining us, Aliza. It's great to  
22 have you.

1 I am actually going to start off with a  
2 question that we obtained prior to the meeting. It  
3 is, what are the tasks that patient advocates  
4 should undertake in order to accelerate the process  
5 from research in the lab to trials?

6 Sorin, do you want to go ahead and take a  
7 stab at that?

8 DR. FEDELES: Sure. Can you hear me,  
9 Christine?

10 DR. NGUYEN: Yes.

11 DR. FEDELES: Again, patient advocacy groups  
12 are partners. They can work with basic  
13 translational clinical scientists to create  
14 opportunities to connect a dispersed patient  
15 population to research, as we heard from Caitlin,  
16 to encourage research funding, to shape proposals,  
17 and to really, at the end of the day, help design  
18 clinical trial protocols.

19 At the end of the day, it's about  
20 connectivity, it's about collaboration, and really  
21 engaging patient advocacy groups as key  
22 stakeholders as part of this ecosystem can result

1 in a better understanding of indications, like PKD,  
2 for example, to identify targeted therapies and  
3 refined standard-of-care therapies.

4 I think they're a key partner as part of  
5 this process, and there's no magic bullet, and  
6 there's no recipe for how to do it exactly. It's  
7 about connectivity and collaboration, data sharing,  
8 and staying at the forefront of pushing efforts  
9 forward. That's what I would say from our  
10 experience in the PKD space.

11 DR. NGUYEN: Great. Thank you so much.

12 DR. NICHOLS: Sorry. I'll jump in if that's  
13 ok, Christine.

14 DR. NGUYEN: Absolutely. Please do. Thank  
15 you.

16 DR. NICHOLS: I couldn't agree more with  
17 what Sorin said and the importance of patient  
18 communities as partners. I think my advice for  
19 advocacy organizations would be to get involved  
20 with the investigators as early as possible in drug  
21 development, even if it's the folks who are working  
22 in cells or mouse models. I don't think it's ever



1 too early to begin to share what's really  
2 impactful, and make sure that from the start, those  
3 relationships and that knowledge is being shared so  
4 that they're focusing on what's most important to  
5 the patients and not aiming for some outcome that  
6 isn't going to ultimately improve patients' quality  
7 of life.

8           The other thing that I would say is the  
9 importance of patients in helping to educate each  
10 other on the importance of different research  
11 opportunities or about different trials. I think  
12 we try to provide lay friendly and public friendly  
13 accessible research, but I really think it's so  
14 impactful when it comes from the community itself  
15 and folks you can speak to, as this was my  
16 experience, this is my advice for participating, or  
17 not participating, or what-have-you.

18           Just really having that voice and speaking  
19 with the community can be so impactful to help  
20 galvanize others and help them understand the  
21 importance of your research efforts.

22           DR. THOMPSON: Maybe I'll jump in, too, for

1 this one, because I think it is just a fabulous  
2 question. Obviously, successful drug development  
3 takes an understanding of mechanism and basic  
4 science, and a lot of basic science research. But,  
5 really, to make that translation to enable  
6 successful drug development, people need the  
7 toolkit. Sponsors need the toolkit to actually do  
8 trials in an efficient manner and effective manner.  
9 So I think patient advocacy groups really play a  
10 critical role in making sure they have that  
11 toolkit. They can have the biomarkers and the  
12 tools they need to understand the patients who are  
13 likely to progress and have a way to help measure  
14 response, and potentially surrogate endpoints. I  
15 think that comes from helping with some of these  
16 studies that are done, but also really advocating  
17 for data sharing.

18 DR. NGUYEN: Thank you.

19 I'll just chime in that the rare disease  
20 space is where we don't have the option to be  
21 inefficient; that's the bottom line. We're rushed  
22 for time, right, because it's a great area of unmet

1 need, and we have a very limited number of  
2 patients. So I think it's critical that there is  
3 as tight of a collaboration between patients, their  
4 families, advocacy groups, sponsors, and working  
5 with the FDA.

6           Ultimately, we're in charge of making sure  
7 that the drugs we approve are safe and effective  
8 for our patients, and there's science and there are  
9 regulations to support that. And the sooner all of  
10 our messaging gets together, everyone understands  
11 each other's perspective and what the needs are. I  
12 see really a big collaboration that needs to dance  
13 well together, and having a one-piece silo and  
14 another really introduces inefficiency that we  
15 can't afford.

16           So I think that's the overarching message,  
17 and certainly for us working in FDA, that's the  
18 vision we hope that everyone will buy into because  
19 at the end of the day, that's what's going to give  
20 our patients and families what they need, and  
21 ultimately that's who we serve.

22           I wish we had another 20 minutes to our

1 panel discussion, but I'm mindful of the time. So  
2 at this time, I want to thank Caitlin, Sorin, and  
3 Aliza for helping us with Session 2, and at this  
4 time, I will turn the meeting over to Kerry Jo for  
5 concluding remarks for our day 1. Thank you very  
6 much.

7 **Concluding Remarks - Kerry Jo Lee**

8 DR. LEE: Hello, everyone, and welcome to  
9 the end of day 1. I really want to thank everyone  
10 who participated in today's incredible session, the  
11 moderators, all of the speakers, as well as the  
12 behind-the-scene staff such as Audrey Thomas from  
13 the Rare Diseases Team and Jill Curran from Johns  
14 Hopkins, and the AV team to make this happen.

15 We had close to 2,000 registrants for this  
16 workshop, and many of you sent questions in  
17 advance, which were really helpful to inform our  
18 discussion, both for today's presentations but also  
19 future engagement. If we know what it is you want  
20 to learn about, it's helpful for us to construct  
21 future sessions that will be informative. For  
22 anyone who missed it or would still like to view,

1 or review, the workshop, given the tremendous  
2 amount of information and resources that our  
3 speakers provided, our intention is for these to be  
4 accessible online in perpetuity, either from the  
5 FDA-CDER ARC webpage, as well as Johns Hopkins  
6 CERSI webpage.

7 A few take-home points I think we heard  
8 today in Session 1 on how to collect quality and  
9 fit-for-purpose data, the FDA does have a real-  
10 world data, real-world evidence hub resource online  
11 that has a tremendous amount of information,  
12 including demonstration projects and key guidances  
13 that are critically important. So please seek that  
14 out for our latest thinking on how to use the real-  
15 world data in the development of real-world  
16 evidence.

17 The power of integration of data; rare  
18 diseases are rare, and having data silos is really  
19 not helpful and creates additional challenges and  
20 can impede rare disease drug development; however,  
21 there are a lot of considerations to keep in mind  
22 when you're trying to integrate multiple data

1 sources to ensure that they're fit for purpose and  
2 informative. There are resources and tools  
3 available to stakeholders to help with these  
4 considerations, and there are fundamental  
5 principles of data sharing that really needs to be  
6 thought about early, such as consent, as well as  
7 what your data standardization is going to be and  
8 the data model that you're going to follow to  
9 inform you how to optimally collect data based on  
10 your setting, such as perhaps a clinic or your  
11 goals.

12 In Session 2, we really learned a lot about  
13 the uses of data sources to inform rare disease  
14 drug development. We learned that learnings from  
15 this data can be used to support qualifications and  
16 fit-for-purpose tools for use in rare disease drug  
17 development trials, but also that we need to be as  
18 thoughtful as possible about trial design. Data is  
19 critical to supporting the translational strength  
20 to support potential biomarkers as surrogate  
21 endpoints for direct clinical benefit, as well as  
22 the utility of other novel endpoints, the selection

1 of the right trial population, enrichment  
2 strategies, and other aspects of trial design.

3 Today we focused also on the real-world data  
4 use for the planning and execution of these  
5 clinical trials and that there are potential roles  
6 for the use of real-world data across all phases of  
7 drug development. We hope the case studies were  
8 particularly informative, and as well, a really  
9 critical point is that the patient experience is  
10 critical to defining the unmet need to be addressed  
11 in clinical trials, as well as designing the  
12 optimal trial for the patient population to be  
13 enrolled in, considering the overall logistics of  
14 conducting a trial. And in the end, it takes all  
15 of us to advance rare disease drug development.

16 So if I could just leave you with one final  
17 thought, I would say, after our session today, it  
18 would really be, when we embark on the collection  
19 and use of real-world data and real-world evidence,  
20 you need to start with the end in mind. If you're  
21 looking to inform elements of future or current  
22 trial design, you have to ensure you're collecting

1 the right elements.

2           So the right elements, at the right time  
3 intervals, and the right patient population, you  
4 have to be thoughtful about data collection,  
5 standardization, and models to ensure that what  
6 you're collecting will be fit for use. And when it  
7 comes to the use of what you've collected, it is  
8 not one-size-fits-all. There are unique aspects of  
9 individual rare diseases and potential therapies  
10 that will affect how you can use the data you've  
11 collected. There are factors of the condition, the  
12 physiology of a disease, predictability of the  
13 natural history, characterization of natural  
14 history, and there are also factors to consider  
15 when it comes to the design of the clinical trial  
16 in which the data is going to be utilized. So the  
17 endpoint selection, the subjectiveness, or  
18 objectiveness, are relevant to the endpoint in the  
19 population studied, as well as the effect of  
20 potential therapy, whether that's modest or large  
21 effect.

22           So today's been a really important



1 discussion in the collection and use of  
2 fit-for-purpose data for rare disease drug  
3 development. We hope to see you all tomorrow as we  
4 move forward into a discussion on how to use data  
5 from small populations and how we can approach and  
6 think about the design and analysis methods,  
7 another big challenge for clinical trials in rare  
8 diseases. Thank you all so much.

9 (Whereupon, at 12:02 p.m., the workshop was  
10 adjourned.)

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