

#### A General Propensity Score for Signal Detection using Tree-Based Scan Statistics

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## Disclosures

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- The presentation reflects the views of the authors and should not be construed to represent FDA's views or policies
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- Dr. Wang was a consultant for Aetion Inc. (2 years ago)

#### What is TreeScan<sup>™</sup>?

• A statistical data mining tool for signal detection

Utilizes tree-based scan statistics

 Adjust p-values for multiple testing of correlated hypotheses when screening thousands of potential adverse events

#### The Tree

Hierarchically grouped diagnosis codes

- Multi-Level Clinical Classification Software (MLCCS)<sup>2</sup>
- ICD9 codes grouped in 4 hierarchical levels
  - Grouped by body systems

# The Scan Statistic

- Null hypothesis: there are no nodes for which there is an effect of exposure
- Statistical alerts at specified threshold (p<0.01) if the test statistic for observed Level 4 data is greater than 99% of test statistics generated under the null
- Statistical Alert ≠ Safety Signal

An alert by itself is not a safety signal and always requires further clinical correlation and evaluation for bias and confounding



### Key Challenge to Using TreeScan with Propensity Score (PS) Matching

• When scanning across thousands of outcomes it is infeasible to select confounders for the PS based on risk for each/all outcomes in the tree



- What should be included in a PS for applied signal detection activities?
  - Consider practicality as well as bias reduction
  - Looking for broad proxy coverage of confounders
  - Good enough for first pass signal detection, to be followed with refinement of potential signals

#### Objective

Develop **candidate "general" propensity scores** for general application in cohort studies with TreeScan and **compare performance** by evaluating 4 drug examples with well characterized safety profiles

• Review of alerts using the *a priori* specified primary general propensity score to adjust for confounding

Empirical approach evaluating 4 examples with established safety profiles, reflecting different populations and indications

 All apply TreeScan with active comparator, new initiator design and 1:1 PS matching

Exposures	Indication	<b>Expected alerts?</b>
Macrolide vs	<b>Community Acquired</b>	None
Fluoroquinolone	Pneumonia	
Azithromycin vs Clarithromycin	Community Acquired Pneumonia	None
Meloxicam vs Celecoxib	Osteoarthritis	None
Valproate vs Lamotrigine	Any	Yes

Empirical approach evaluating 4 examples with established safety profiles, reflecting different populations and indications

 All apply TreeScan with active comparator, new initiator design and 1:1 PS matching

Exposures	Indication	Expect	ed alerts?
Macrolide vs Fluoroquinolone	Community Acquired Pneumonia	None	<ul><li>Short term exposure</li><li>Used immediately</li></ul>
Azithromycin vs Clarithromycin	Community Acquired Pneumonia	None	<ul> <li>Between class vs within class</li> </ul>
Meloxicam vs Celecoxib	Osteoarthritis	None	
Valproate vs Lamotrigine	Any	Yes	

Empirical approach evaluating 4 examples with established safety profiles, reflecting different populations and indications

 All apply TreeScan with active comparator, new initiator design and 1:1 PS matching

Exposures	Indication	Expecte	ed alerts?
Macrolide vs Fluoroquinolone	Community Acquir Pneumonia	ed None	
Azithromycin vs Clarithromycin	Community Acquir Pneumonia	ed None	
Meloxicam vs Celecoxib	Osteoarthritis	None	<ul> <li>Intended chronic use</li> <li>Older, sicker population</li> <li>个 comorbidity</li> </ul>
Valproate vs Lamotrigine	Any	Yes	. ,

Empirical approach evaluating 4 examples with established safety profiles, reflecting different populations and indications

 All apply TreeScan with active comparator, new initiator design and 1:1 PS matching

Exposures	Indication	Expect	ed alerts?
Macrolide vs Fluoroquinolone	Community Acquired Pneumonia	None	
Azithromycin vs Clarithromycin	Community Acquired Pneumonia	None	<ul> <li>Balanced on indication in design phase</li> </ul>
Meloxicam vs Celecoxib	Osteoarthritis	None	<ul> <li>Intended chronic use</li> </ul>
Valproate vs Lamotrigine	Any	Yes	<ul> <li>个 comorbidity (different)</li> <li>Need to adjust for multiple indications</li> </ul>

- Evaluated candidate PSs that included a combination of 3 types of covariates
  - Predefined general: based on characteristics\* that are risk factors for a variety of outcomes
  - High dimensional PS (hdPS): empirically selected based on relationship to exposure
  - Tailored: investigator selected variables tailored to each exposure pair

	Predefined general	hdPS	Tailored
1		Х	
2	Х		
3	Х	Х	
4	Х		Х
5	Х	Х	Х

\*combined comorbidity score<sup>3</sup>, frailty index<sup>4</sup>, health seeking (e.g. screening, vaccination), utilization

- Compared candidate PSs on
  - Sample size after 1:1 matching (related to power)
  - Covariate balance
  - Alerting patterns

#### **Expected effect of exposure?**

	Yes	No	Unknown
Alort	True	False	2
Alert	Positive	Positive	<u> </u>
No Alort	False	True	2
NU Alei l	Negative	Negative	:

Exposures	<b>Covariate<sup>1</sup> imbalance</b>
	before matching

Macrolide vs	Age (older)
Fluoroquinolone	
Azithromycin vs	# prior ED visits
Clarithromycin	
Meloxicam vs	DME
Celecoxib	Anticoagulants
	Opioids
	Peptic ulcer/GI bleed
	# IP stays
Valproate vs	Gender
Lamotrigine	Anxiety
	Bipolar disorder
	Depression
	Other antidepressants
	Migraine
	Schizophrenia
	ТСА
	# prior IP stays

<sup>1</sup> Standardized differences > 0.1 for predefined general or tailored covariates

DME = durable medical equipment, ED = emergency department, GI = gastrointestinal,

TCA = tricyclic antidepressants, IP = inpatient

#### **Exposures**

Covariate<sup>1</sup> imbalance before matching

Macrolide vs	Age (older)
Fluoroquinolone	
Azithromycin vs	# prior ED visits
Clarithromycin	
Meloxicam vs	DME
Celecoxib	Anticoagulants
	Opioids
	Peptic ulcer/GI bleed
	# IP stays
Valproate vs	Gender
Lamotrigine	Anxiety
	Bipolar disorder
	Depression
	Other antidepressants
	Migraine
	Schizophrenia
	TCA antidepressants
	# prior IP stays

Matched on indication in design phase Fairly well balanced before matching

<sup>1</sup>Standardized differences > 0.1 for predefined general or tailored covariates

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Exposures	<b>Covariate<sup>1</sup> imbalance</b>
_	before matching

Macrolide vs	Age (older)
Fluoroquinolone	
Azithromycin vs	# prior ED visits
Clarithromycin	

Meloxicam vs	DME
Celecoxib	Anticoagulants
	Opioids
	Peptic ulcer/GI bleed
	# IP stays
Valproate vs	Gender
Lamotrigine	Anxiety
	Bipolar disorder
	Depression
	Other antidepressants
	Migraine
	Schizophrenia
	TCA antidepressants
	# prior IP stays

Matched on indication in design phase Comparator patients were sicker

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DME = durable medical equipment, ED = emergency department, GI = gastrointestinal,

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Exposures

**Covariate**<sup>1</sup> imbalance

	before matching	
Macrolide vs Fluoroquinolone	Age (older)	
Azithromycin vs Clarithromycin	# prior ED visits	
Meloxicam vs Celecoxib	DME Anticoagulants Opioids Peptic ulcer/GI bleed # IP stays	
Valproate vs Lamotrigine	Gender Anxiety Bipolar disorder Depression Other antidepressants Migraine Schizophrenia TCA antidepressants	Initiators allowed to enter cohort with different indications More baseline imbalances, reflective of indications

<sup>1</sup> Standardized differences > 0.1 for predefined general or tailored covariates

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Exposures	<b>Covariate<sup>1</sup> imbalance</b>
	before matching

Macrolide vs	Age (older)
Fluoroquinolone	
Azithromycin vs Clarithromycin	# prior ED visits

Meloxicam vs Celecoxib	DME Anticoagulants Opioids Peptic ulcer/GI bleed # IP stays	Matching balanced every bas that was included in
Valproate vs Lamotrigine	Gender Anxiety Bipolar disorder Depression Other antidepressants Migraine Schizophrenia TCA antidepressants # prior IP stays	

seline covariate the PS

<sup>1</sup>Standardized differences > 0.1 for predefined general or tailored covariates

DME = durable medical equipment, ED = emergency department, GI = gastrointestinal,

TCA = tricyclic antidepressants, IP = inpatient

	Sample size			
Exposures	Covariate <sup>1</sup> imbalance before matching	e % Matched <sup>2</sup> using general predefined	Decrease in sample after adding hdPS/tailored	
		covariates	covariates to predefined*	
Macrolide vs	Age (older)	87%	1-4%	
Fluoroquinolone		of macrolide		
Azithromycin vs	# prior ED visits	100%	0%	
Clarithromycin	_	of clarithromycin		
Meloxicam vs	DME	97%	3-5%	
Celecoxib	Anticoagulants	of celecoxib		
	Opioids			
	Peptic ulcer/GI bleed			
	# IP stays			
Valproate vs	Gender	90%	10-15%	
Lamotrigine	Anxiety	of valproate		
	Bipolar disorder			
	Depression			
	Other antidepressants			
	Migraine	1:1 matching on g	eneral	
	Schizophrenia			
	TCA antidepressants			
	# prior IP stays	reductions in sam	ple size	

<sup>1</sup>Standardized differences > 0.1 for predefined general or tailored covariates <sup>2</sup>% of smaller exposure group DME = durable medical equipment, ED = emergency department, GI = gastrointestinal,

TCA = tricyclic antidepressants, IP = inpatient

	Sample size				
Exposures	Covariate <sup>1</sup> imbalance before matching	% Matched <sup>2</sup> using general predefined covariates	Decrease in sample after adding hdPS/tailored covariates to predefined*		
Macrolide vs Fluoroquinolone	Age (older)	87% of macrolide	1-4%		
Azithromycin vs Clarithromycin	# prior ED visits	100% of clarithromycin	0%		
Meloxicam vs Celecoxib	DME Anticoagulants Opioids Peptic ulcer/GI bleed # IP stays	97% of celecoxib	3-5%		
Valproate vs Lamotrigine	Gender Anxiety Bipolar disorder Depression	90% of valproate	10-15%		
	Other antidepressants Migraine Schizophrenia TCA antidepressants # prior IP stays	Adding va May subtl Consider J impact on	riables → smaller sample y change matched pop characteristics potential effect modification and power to detect alerts		

<sup>1</sup>Standardized differences > 0.1 for predefined general or tailored covariates <sup>2</sup>% of smaller exposure group DME = durable medical equipment, ED = emergency department, GI = gastrointestinal,

TCA = tricyclic antidepressants, IP = inpatient

Exposures	Characteristics of example	Statistical alerting pattern
Macrolide vs Fluoroquinolone Azithromycin vs Clarithromycin	<ul> <li>Short term exposure</li> <li>Used immediately</li> <li>Between class comparison</li> <li>Within class comparison</li> </ul>	<ul> <li>4 unique alerts in crude analyses</li> <li>1-4 alerts across candidate general PS matched</li> <li>Alerts indicated need to modify approach to better capture and exclude based on pregnancy</li> <li>3 alerts in crude analyses</li> <li>0 alerts after any PS matching</li> </ul>
Meloxicam vs Celecoxib	<ul> <li>Intended chronic use</li> <li>Older, sicker population</li> <li>High comorbidity (physical)</li> </ul>	<ul> <li>0 alerts in crude analysis</li> <li>1-3 unique alerts after any PS matching</li> <li>All alerts were labeled events</li> </ul>
Valproate vs Lamotrigine	<ul> <li>Intended chronic use</li> <li>High comorbidity (mental health)</li> <li>Multiple indications</li> </ul>	<ul> <li>Crude analysis <ul> <li>85 alerts (most clearly confounded)</li> <li>3 alerts were labeled events</li> </ul> </li> <li>Predefined primary PS (general + hdPS) <ul> <li>7 indication related</li> <li>1 alert related to labeled event</li> <li>2 unclassified alerts pending further characterization for confounding</li> </ul> </li> <li>Other candidate PS similar pattern</li> </ul>

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Clarithromycin	comparison	<ul> <li>0 alerts after any PS matching</li> </ul>
Meloxicam vs Celecoxib	<ul> <li>Intended chronic use</li> <li>Older, sicker population</li> <li>High comorbidity (physical)</li> </ul>	<ul> <li>0 alerts in crude analysis</li> <li>1-3 unique alerts after any PS matching</li> <li>All alerts were labeled events</li> </ul>
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Clarithromycin	comparison	• 0 alerts after any PS matching
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Exposures	Characteristics of example	Statistical alerting pattern
Macrolide vs Fluoroquinolone	<ul> <li>Short term exposure</li> <li>Used immediately</li> <li>Between class comparison</li> </ul>	<ul> <li>4 unique alerts in crude analyses</li> <li>1-4 alerts across candidate general PS matched</li> <li>Alerts indicated need to modify approach to better capture and exclude based on pregnancy</li> </ul>
Azithromycin vs Clarithromycin	Within class     comparison	<ul><li> 3 alerts in crude analyses</li><li> 0 alerts after any PS matching</li></ul>
Meloxicam vs Celecoxib	<ul> <li>Intended chronic use</li> <li>Older, sicker population</li> <li>High comorbidity (physical)</li> </ul>	<ul> <li>0 alerts in crude analysis</li> <li>1-3 unique alerts after any PS matching</li> <li>All alerts were labeled events</li> </ul>
Valproate vs Lamotrigine	<ul> <li>Intended chronic use</li> <li>High comorbidity (mental health)</li> <li>Multiple indications</li> </ul>	<ul> <li>Crude analysis <ul> <li>85 alerts (most clearly confounded)</li> <li>3 alerts were labeled events</li> </ul> </li> <li>Predefined primary PS (general + hdPS) <ul> <li>7 indication related</li> <li>1 alert related to labeled event</li> <li>2 unclassified alerts pending further characterization for confounding</li> </ul> </li> <li>Other candidate PS similar pattern</li> </ul>

## Limitations

- Evaluation of empirical examples only
  - → Lack strong reference standard "truth" for all outcomes being scanned
  - Why didn't expected adverse events alert after adjustment?
    - Not strong evidence to begin with
    - Warning may be effective, prescribers are not giving drug to high risk patients
    - Outcome misclassification (nodes may not be sensitive/specific)
    - Loss of power
  - Relative ability of different PS adjusted analysis to detect true adverse effects depends on interplay between misspecification and sample size
    - Bias-variance tradeoff could be further investigated with simulation

- Alerting pattern
  - − ~8,000 outcomes screened  $\rightarrow$  handful of alerts after PS adjustment
  - Few false positives
  - Unknown magnitude of false negatives
- Design matters
  - Requiring active-comparators to match on drug indication makes patients more similar even when comorbidities aren't measured well

 $\rightarrow$  fewer confounding related false alerts

- Well balanced on predefined/tailored covariates before matching
- With selection of a good active comparator, no major differences in alerting pattern for candidate general PS

- Consider scalability for active surveillance/signal detection
  - Predefined general covariates are risk factors for many outcomes, broadly relevant as confounders across the tree
  - Covariates selected based on relationship to exposure may not be confounders for most outcomes (instruments?)
    - Potentially increasing bias and variance<sup>5</sup>/decreasing power for real signals



When should we include hdPS exposure-based selection of covariates in a TreeScan signal detection activity?

#### It depends

Consider design choices and level of concern about remaining confounding (given the comparator and inclusion/exclusion criteria) versus loss of power

#### Strong active comparator

- Within class
- Same line of therapy
- Same indication
- A lot of unmeasured potential confounding handled by design

#### **Predefined general**

#### Weaker active comparator

- Cross class comparison
- Different line of therapy (e.g. 1<sup>st</sup> vs 2<sup>nd</sup>)
- Different indications for use
- <u>Consider</u> possibility of adding more broad proxy adjustment (bias/variance tradeoff)

**Predefined general + hdPS?** 

Can always do both as sensitivity analyses and evaluate how the PS affects sample size, covariate balance and alerting patterns

- TreeScan with a general PS is a first pass for signal detection
  - Relevant alerts should be refined with pharmacoepidemiologic assessment where confounding control is tailored to the specific outcome(s) under investigation





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#### Back up slides

#### The Scan Statistic

T = unconditional Bernoulli scan statistic

$$LLR(G) = ln\left(\frac{\left(\frac{c_G}{c_G + n_G}\right)^{c_G} \left(\frac{n_G}{c_G + n_G}\right)^{n_G}}{(p)^{c_G}(1 - p)^{n_G}}\right) I\left(\frac{c_G}{c_G + n_G} > p\right)$$

 $T = \max_{G} LLR(G)$ 

G = node of interest

 $c_G$  = cases in the treatment group for a given node

 $n_{G}$  = cases in the reference group for a given node

p = probability of being in the treatment group (for 1:1 matched this is 0.5)

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# **Meloxicam label**

#### -----WARNINGS AND PRECAUTIONS------

- Serious and potentially fatal cardiovascular (CV) thrombotic events, myocardial infarction, and stroke. Patients with known CV disease/risk factors may be at greater risk. (5.1)
- Serious gastrointestinal (GI) adverse events which can be fatal. The risk is greater in patients with a prior history of ulcer disease or GI bleeding, and in patients at higher risk for GI events, especially the elderly. (5.2)
- Elevated liver enzymes, and rarely, severe hepatic reactions.
   Discontinue use imme Table 1a Adverse Events (%) Occurring in ≥2% of MOBIC Patients in a 12-Week Osteoarthritis Placebo- and Active-Controlled Trial Worsen. (5.3)

New onset or worseni		Placebo	MOBIC 7.5 mg daily	MOBIC 15 mg daily	Diclofenac 100 mg daily
monitored closely dur	No. of Patients	157	154	156	153
Eluid retention and ed	Gastrointestinal	17.2	20.1	17.3	28.1
	Abdominal pain	2.5	1.9	2.6	1.3
fluid retention or hear	Diarrhea	3.8	7.8	3.2	9.2
Renal papillary necros	Dyspepsia	4.5	4.5	4.5	6.5
with caution in the elc	Flatulence	4.5	3.2	3.2	3.9
failure, liver dysfuncti	Nausea	3.2	3.9	3.8	7.2
angiotensin II antagor	Body as a Whole Accident household	1.9	4.5	3.2	2.6
renal impairment is no	Edema <sup>1</sup>	2.5	1.9	4.5	3.3
Serious skin adverse e	Fall	0.6	2.6	0.0	1.3
Johnson syndrome (S.	Influenza-like symptoms Central and Peripheral	5.1	4.5	5.8	2.6
can be fatal and can o	Nervous System Dizziness	3.2	2.6	3.8	2.0
appearance of rash or	Headache	10.2	7.8	8.3	5.9
	Respiratory Pharyngitis	1.3	0.6	3.2	1.3
	Upper respiratory tract infection	1.9	3.2	1.9	3.3
	Skin Rash <sup>2</sup>	2.5	2.6	0.6	2.0

## Valproate label

#### - CONTRAINDICATIONS

- Hepatic disease or significant hepatic dysfunction (4, 5.1)
- Known mitochondrial disorders caused by mutations in mitochondrial DNA polymerase γ (POLG) (4, 5.1)
- Suspected POLG-related disorder in children under two years of age (4, 5.1)
- Known hypersensitivity to the drug (4, 5.12)
- Urea cycle disorders (4, 5.6)

#### ······ WARNINGS AND PRECAUTIONS

- Hepatotoxicity; evaluate high risk populations and monitor serun (5.1)
- Birth defects and decreased IQ following *in utero* exposure; only. treat pregnant women with epilepsy if other medications are unac should not be administered to a woman of childbearing potential essential (5.2, 5.3, 5.4)
- Pancreatitis; Depakene should ordinarily be discontinued (5.5)

- Suicidal behavior or ideation; Antiepileptic drugs, including Depakene, increase the risk of suicidal thoughts or behavior (5.7)
- Bleeding and other hematopoietic disorders; monitor platelet counts and coagulation tests (5.8)
- Hyperammonemia and hyperammonemic encephalopathy; measure ammonia level if unexplained lethargy and vomiting or changes in mental status, and also with concomitant topiramate use; consider discontinuation of valproate therapy (5.6, 5.9, 5.10)
- Hypothermia; Hypothermia has been reported during valproate therapy with or without associated hyperammonemia. This adverse reaction can also occur in patients using concomitant topiramate (5.11)
- Drug Reaction with Eosinophilia and Systemic Symptoms (DRESS)/Multiorgan hypersensitivity reaction; discontinue Depakene (5.12)
- Somnolence in the elderly can occur. Depakene dosage should be increased slowly and with regular monitoring for fluid and nutritional intake (5.14)
  - ----- ADVERSE REACTIONS ------
- Most common adverse reactions (reported >5%) are abdominal pain, alopecia, amblyopia/blurred vision, amnesia, anorexia, asthenia, ataxia, bronchitis, constipation, depression, diarrhea, diplopia, dizziness, dyspepsia, dyspnea, ecchymosis, emotional lability, fever, flu syndrome, headache, increased appetite, infection, insonnia, nausea, nervousness, nystagmus, peripheral edema, pharyngitis, rhinitis, somnolence, thinking abnormal, thrombocytopenia, tinnitus, tremor, vomiting, weight gain, weight loss. (6.1)
- The safety and tolerability of valproate in pediatric patients were shown to be comparable to those in adults (8.4).