

Introduction: Challenges to generate Real-world Evidence (RWE) in Rare Diseases

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Disclosure statement

D Rosenberg is an employee of Actelion Pharmaceuticals Ltd, **Johnson and Johnson**.

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300

6000+

70%

5%

72%

A window into a rare disease, Niemann-Pick disease Type C

[Orphanet J Rare Dis.](#) 2020; 15: 104.

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PMCID: PMC7183679

PMID: [32334605](https://pubmed.ncbi.nlm.nih.gov/32334605/)

Treatment outcomes following continuous miglustat therapy in patients with Niemann-Pick disease Type C: a final report of the NPC Registry

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ORIGINAL ARTICLE



Long-term survival outcomes of patients with Niemann-Pick disease type C receiving miglustat treatment: A large retrospective observational study

Regulatory agencies' outlook

- An orphan drug is a drug intended for use in a rare disease.
- Varied definitions
 - World Health Organization defines a rare disease—sometimes referred to as an orphan disease—as one that affects fewer than 65 per 100,000 people.
 - United States - FDA, a rare disease is one that affects fewer than 200,000 people.
 - EU – EMA defines an orphan disease as one that affects no more than 5 per 10,000 individuals.
- To-date
 - From 2003-2023, > 2870 medicines with EMA orphan designation, and over 240 orphan medicines authorised in the EU.
 - From ODA (1983) to 2023, 6340 orphan drug designations passed covering 1079 rare diseases.
 - 882 of the ODD resulted in at least one approval for use in 392 diseases, 5-10% of all rare diseases.

Solutions and Challenges (1/3)

Rare Disease needs	Solutions	Methods challenge
<p>Little known on epidemiology, natural history and burden of diseases</p>	<ul style="list-style-type: none"> - Secondary use data sources such as EHR/insurance claims may offer large sample sizes. Population-level data can support calculations of incidence, prevalence, survival - Registries/clinical cohorts may offer deep clinical detail and natural history follow-up for complex medical conditions 	<ul style="list-style-type: none"> - Identifying the disease (phenotype/classification systems) - Denominators, projection when data are not population-level - Limited follow-up (vs. registry) in large administrative data sources or linkage possibility for key outcomes of interest
<p>Small, heterogenous, populations</p>	<ul style="list-style-type: none"> - Large secondary use data sources may provide more patients - Registries can gather patients from scattered geography and specialist centers - Pooling secondary use of data (large admin and/or registries) across (federated) networks can increase sample size and can bring together geographically isolated / scattered groups of or single patients 	<ul style="list-style-type: none"> - May be selection biases / generalizability issues. - Low patient count and valid treatment comparator may be unavailable for comparative effectiveness / safety outcomes (self-controlled designs help but have limitations) - Methodological complications to control confounding - Multiple governance and analytical issues with (federated) data networks

Solutions and Challenges (2/3)

Rare Disease needs	Solutions	Methods challenge
Delays in diagnosis, from early symptoms to diagnosis and beyond	<ul style="list-style-type: none">- Secondary use RWD sources such as large EHR/Claims with data before diagnosis helps identify order and timing of symptoms and can quantify diagnosis delay- EHRs/digital health tracker/tests/images data before diagnosis helps develop prediction models for identify patients who have rare disease earlier	<ul style="list-style-type: none">- Identifying the symptoms/disease (phenotype/classification systems)- Duration of look-back to identify patient journey- Positive predictive value of prediction models in small populations

Solutions and Challenges (3/3)

Rare Disease needs	Solutions	Methods challenge
Inform RD Trial or act as comparator	<ul style="list-style-type: none">– Data from secondary use databases can improve statistical efficiency of trial or be used for comparators (external controls)/ de novo data collection for RWD control– Validate surrogate endpoints	<ul style="list-style-type: none">– Be clear on intended use of RWE– Study design considerations, different follow up methods– Varied recruitment strategies between trial and RWD source
RWD sources: Quality and quantity	<ul style="list-style-type: none">– Consider broad array of RWD, registries, claims, EHRs, patient generated, other	<ul style="list-style-type: none">– Determine, plan and document clearly the data quality processes– Linkage with other data sources– Be clear on original intended use of RWD as can lead to missingness/bias– data quality may result in information bias

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Rare Disease Patients
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ISPE Rare Diseases SIG
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