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Mary L. Durham, PhD
Vice President/Research Kaiser Foundation Hospitals Director, The Center for Health Research Northwest Hawaii Southeast
Center for Health Research





Center for Health Research





Knowledge as a By-Product of Care: Drug & Device Surveillance in Large Health Systems (Opportunities & Challenges)

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> Jonathan B. Perlin, MD, PhD, MSHA, FACP, FACMI President, Clinical Services & Chief Medical Officer HCA / Hospital Corporation of America

Adjunct Professor of Medicine and Biomedical Informatics, Vanderbilt University Adjunct Professor of Health Administration, Virginia Commonwealth University

Jonathan.Perlin@HCAHealthcare.com

Overview:

- Opportunities & Challenges
 - Technology
 - Business / Proprietary Interests
 - Privacy & Security
 - Clinical Practice
- Proof-of-Concept Examples
 - VA (Drug Surveillance, Blood Pressure Control & Blood Glucose)
 - HCA (Influenza Surveillance & H1N1Vaccines)
- Summary & Policy Points

Technology & Domain Challenges

Goal: Ability to share data as "transparent by-product of care"

- Challenges:
 - Variable standards for storing data and transmitting data
 - Where electronic, different representation of same clinical between/within organizations (e.g., lack of semantic interoperability)
 - Domain complexity (conceptual complexity) contributes to IT complexity
 - Encoding of use patterns incomplete
 - Usually have med start & stop and allergies, but not . . .
 - Non-allergy reason for stopping medication
 - Consistent documentation of patient response
 - Genetic information or other molecular bio-markers
 - No monolithic "master database"
 - Data are distributed in multiple data sets, in multiple organizations
 - Some resident at organization, some outside (e.g., PBM, pharmacy, etc.)
 - Most care in small practices; most hospitals independent or small systems

Technology & Domain Challenges

Goal: Ability to share data as "transparent by-product of care"

- Opportunities:
 - Use HITECH as organizing principle for data requirements
 - "Meaningful Use" interoperability requirements to drive semantic interoperability
 - ePrescribing requirements extend trail of data across organizations
 - Larger systems, federations may be more wired, thus good starting point
 - Offer capacity to address urgent issues (i.e., novel H1N1 flu or vaccine)
 - Create incentives to drive drug/device database development and/or data submission
 - Opportunities for exploration of public data sets for business development?
 - Opportunities for "first use" or new use
 - Mandate for reporting of adverse events at earliest detection
 - » May require analytic algorithms
 - Attach data requirements to FDA "Expanded Access" programs

Business / Proprietary Interests

Goal: Participation by private-sector health care community

- Challenges:
 - Necessary data are typically not produced for routine operations
 - Necessitates changing clinical data capture process (real costs)
 - Necessitates developing, aggregating databases (real costs)
 - Data have inherent value; unrealistic to expect health providers to pay to compete against own financial interests
 - Hospital/health systems may be developing datasets for research use or as productive asset for business with pharma, device, investors, etc.
- Opportunities:
 - Use HITECH to reduce financial barriers (e.g., reward participation)
 - Provide or subsidize software to support desired data development
 - Reward participants through positive recognition
 - Link participation to CMS program participation or "bonuses"

Privacy & Security

Goal: Maintaining Privacy & Security of PHI

- Challenges:
 - HIPAA compliance
 - Liability of data aggregation
 - Database loss is larger threat
 - Cost of de-identification, potential need to create a data replicate
 - Public perception about personal data use & privacy
- Opportunities:
 - Simplification of Business Associate Agreement for this purpose
 - Provision of de-identification standards, software
 - Education that de-identified data is a public good

Clinical Practice

Goal: Clinicians don't see surveillance as professional obligation

- Challenges:
 - Currently, drug (device) safety is perceived responsibility of FDA
 - Obligation to safe drug/device use around prescription, adverse events
 - Detailed recording of effectiveness & reason for stopping is not routine
 - Drug use not consistently associated with bio-markers, certainly not molecular bio-markers
 - While physiologic markers for hypertension control evident, biomarkers for who may be most/least responsive to particular antihypertensive neither clear, nor routine
- Opportunities:
 - Education: Prescriptive privileges obligate activity beyond Rx
 - Reimbursement for "prescription" visits, calls (CMS)
 - Partnership with NIH (NCI, NHGRI, etc.) to advance biomarker associations

New Knowledge as a Transparent By-Product of Care: From "TRIP" (Translating Research into Practice) to "TPIR" (Translating Practice into Research)



VA Experience in Post-Marketing Surveillance

- Trovan® (Trovafloxicin) hepatotoxicity
 - Early data in VA
- Atypical Antipsychotics weight gain, hyperglycemia, diabetes
 - Early data in VA
- Baycol® (Cerivastatin) rhabdomyolysis
 - Reported in DoD data; not added to VA formulary

Discovery: Seasonal Variation in Blood Pressure of Hypertensive Patients Returning to < 140 / < 90



Latest BP in the last 6 months (n=10,000 patients)

Any Differences Between Panels (Patients)? 1) None, 2) One to Two, 3) Three to Four, 4) Five or more



Challenge One: Pattern Recognition Here ?

Genomic? Proteomic? Phenotypic? **Empiric Pattern?** Lazarus List CTX + B6

Applying the Evidence



- Two ICU Patients
 - Both Hyperglycemic
 - BG > 300 mg/dl
 - One: Diabetic
 - One: No Prior Diagnosis of DM
- Who is at greater risk?
 - Could do a RCT
 - Practical?
 - Ethical?
 - Timely?



Adjusted Odds Ratios for Mortality (2002-05) in VA ICU's

Mean Glucose is Independently Associated with Increased Mortality

Odds Ratio (95% CI)

	Mean Glucose (mg/dl)				
	111-145	146-199	200-300	> 300	
Entire cohort	1.3 (1.2-1.3)	1.7 (1.6-1.8)	2.0 (1.9-2.1)	2.6 (2.3-2.9)	
No DM	1.3 (1.2-1.4)	1.9 (1.8-2.0)	2.7 (2.4-2.9)	3.8 (3.1-4.6)	
+ DM	1.1 (1.0-1.3)	1.4 (1.2-1.6)	1.8 (1.5-2.0)	2.4 (2.0-2.9)	

HCA Represents Approximately 5% of Inpatient Services in the US

Admission Category	HCA	National	HCA as % of National
Deliveries	220,221	4.3M	5.12%
Inpatient Cardiac Cath	26,691	490,285	5.44%
CABG	12,518	266,072	4.70%
CHF	44,775	1,012,404	4.42%
Joint Replacement	31,128	504,686	6.17%
Total Inpatients	1,765,704	37,067,877	4.76%

*12 Months ending June 30, 2006.



- In May 2009, 11 healthcare industry representatives were asked to participate in the Influenza Medical Surge Group
- HCA was asked by the CDC to share information on influenza
 - 14,000-16,000 daily ED visits (>18,000/day with novel H1N1)
 - 1,300 daily influenza tests (since 9/09)
- Working with CDC leadership, the following daily reports were requested:
 - Emergency Department total visits by age group
 - Emergency Department influenza visits by age group
 - Rapid influenza tests performed with results
 - 2009 H1N1 tests performed with results



- Emergency department data elements
 - Date of visit
 - Zip code of emergency department
 - Patients age in years (0-4, 5-24, 25-49, 50-64, >65)
 - Number of emergency department patients
 - Number of patients with influenza like illness (ILI)
 - Defined by fever >100°F, with cough and/or sore throat

		AgeGrp1 0-4 Yrs		AgeGrp2 5-24 Yrs		AgeGrp3 25-49 Yrs		AgeGrp4 50-64 Yrs	
ER Arrival Date	Facility Zip	Patients In ER	Patients with ILI Symptoms	Patients In ER	Patients with ILI Symptoms	Patients In ER	Patients with ILI Symptoms	Patients In ER	Patients with ILI Symptoms
11/4/2009		7	1	24	1	42	3	7	0
11/4/2009		5	3	14	4	25	1	6	0
11/4/2009		4	1	18	8	25	6	10	0
11/4/2009		1	0	19	0	23	4	6	0
11/4/2009		15	5	25	6	37	6	17	0
11/4/2009		44	23	79	14	90	7	27	4
11/4/2009		10	3	37	4	62	1	34	1
11/4/2009		5	1	22	2	36	1	7	0
11/4/2009		2	1	23	5	13	1	6	1
11/4/2009		4	2	10	2	25	0	17	1
11/4/2009		0	0	9	5	16	1	6	0
11/4/2009	_	5	2	12	2	12	1	6	0
11/4/2009		3	0	12	0	7	0	3	0
11/4/2009		29	6	36	1	41	2	14	0
11/4/2009		6	0	22	0	32	0	8	0
11/4/2009		28	4	29	1	9	0	0	0
11/4/2009		5	0	13	0	20	0	4	0
11/4/2009		8	2	22	1	34	1	8	0
11/4/2009		11	0	29	1	40	0	19	0
11/4/2009		5	2	12	0	21	0	6	0
11/4/2009		4	0	34	1	59	1	23	0
11/4/2009		1	0	4	0	11	1	6	0
11/4/2009		4	1	13	1	23	2	6	0

- Laboratory data elements
 - Date of laboratory test
 - Zip code of hospital laboratory
 - Rapid influenza tests ordered
 - Rapid influenza tests positive
 - Rapid influenza tests negative
 - 2009 H1N1 tests ordered
 - 2009 H1N1 tests positive
 - 2009 H1N1 tests negative

Date	facility zip	Influ A Rapid Tests Ordered	Influ A Rapid Tests Positive	Influ A Rapid Tests Negative	H1N12009 Confirm Tests Ordered	H1N12009 Confirm Tests Positive	H1N12009 Confirm Tests Negative
11/4/2009		24	0	24	0	0	0
11/4/2009		35	5	32	0	0	0
11/4/2009		2	0	2	0	0	0
11/4/2009		1	1	0	3	3	0
11/4/2009		24	2	21	0	0	0
11/4/2009		0	0	0	0	0	0
11/4/2009		0	0	0	0	0	0
11/4/2009		0	0	0	0	0	0
11/4/2009		4	1	4	0	0	0
11/4/2009		6	1	5	0	0	0
11/4/2009		9	1	8	0	0	0
11/4/2009		14	1	13	0	0	0
11/4/2009		3	1	2	0	0	0
11/4/2009		13	0	12	0	0	2
11/4/2009		7	2	6	0	0	0
11/4/2009		28	1	28	0	0	0
11/4/2009		2	0	2	0	0	0
11/4/2009		8	1	7	0	0	0
11/4/2009		6	0	6	0	0	0
11/4/2009		1	0	1	0	0	0
11/4/2009		19	1	18	0	0	0
11/4/2009		6	0	5	0	0	0
11/4/2009		5	2	4	0	0	0
11/4/2009		2	0	3	0	0	0



- A Memorandum of Understanding (MOU) was developed for the collaboration
- The work required each hospital to make changes to their electronic record systems to standardize how information was entered and reported
- Work was completed in less than 2 weeks
- An inpatient report is currently under development



- Reports are sent to the CDC 7 days a week
- CDC Weekly Influenza Report data lags 7-10 days
- HCA data is current within 48 hours
- Data is utilized by HCA Management Team to for resource allocation, staffing assistance, and pandemic management









Surveillance

ILI ED Visits as Percentage of Total ED Volume, Oct. 7-13



Green: Less than 5% of ED Visits are ILI patients

Yellow: 5-9 % of ED visits are ILI patients

Red: 10% or greater of ED visits are ILI patients

White: Division data excluded-lack of compliance

* Division data may be incomplete due to hospitals excluded from the data set due to lack of compliance



Surveillance: WBC Tests





Policy & Concluding Points ...

- Product Surveillance: Voluntary or mandatory?
 - If voluntary, are there incentives to offset cost and/or create the business case (including opportunity to benefit from discovery)
- Variety of Challenges & Opportunities:
 - Technology
 Business & Proprietary Interests
 Privacy & Security
 Clinical Practice
 None Insurmountable -All nuanced & complex;
 Requires "customerfriendly" approach
- There is a compelling national value proposition:
 - Opportunity for earlier detection of adverse events, new uses, utilization patterns & strategic investments



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Barriers and Solutions to Private Sector Participation: NCDR Perspective

November 23, 2009

Janet Wright, MD FACC Sr Vice President Science and Quality American College of Cardiology



American College of Cardiology Mission:

"... to foster optimal cardiovascular care and disease prevention through professional education, promotion of research, leadership in the development of standards and guidelines and the formulation of health care policy."

NCDR[™] mission is to:

"... to improve the quality of cardiovascular patient care by providing information, knowledge and tools; implementing quality initiatives; and supporting research that improves patient care and outcomes.

What is the NCDR?

- Suite of Clinical Registries
- 15 years in Evolution
- Benchmarks and Quality Improvement
 - Standardized, evidence-based data collection
 - Quarterly benchmark reports
- Supports P4P and Pay for Reporting Programs
- Platform for Outcomes Research
- Solution of Post-Market Surveillance
- Performance Measurement Tool







Post-Market Registry Goals

Medical Device Performance and Patient Outcomes

- Develop a network of hospitals and clinics - Careful sampling to reflect reference population
- Measure device performance and recall or remove devices that perform poorly
 - Provide a method to monitor real world application that preserves reasonable approval cycles but assures immediate removal when new problems may arise
 - Removal goal: No device should be on the market if an available
 - alternative is superior
- Measure device efficacy/effectiveness
 Confirm pre-market assumptions
- Detect off-label trends to initiate new studies
 Detect new AEs and estimate known AE rates
- Addresses long-term durability and effect concerns

PI	Pre-Market				Post-Market		
	/ ·				egistry		
				Phase 4			
Phase 1	Phase 2	Phase 3	Post- Approval	Post- Market	Registries		
Safety is primary endpoint Small sample Size (n < 20) Highly selected population (must meet several selection criteria) Short duration	Safety and efficacy are primary endpoints Limited sample size (n - 25-50) Highly selected population Short duration	Safety and efficacy are primary endpoints Larger sample size to test hypotheses (n – 150-250) Selected population Privotal studies (randomized controlled trial, RCT) Longer duration	FDA driven and - negotiated Centers defined Centers defined Phase 3 continuance Sample size pre- determined Study interval defined	Sponsor driven Generally RCT or Calams based Direct product comparisons Costs collected Sample size pre- determined Study interval defined	Collect product performance and safe data Effectiveness is the primary endpoint Very large and usually undefined sample size Real world population (no selection criteria beyond device, diseas rexposure) Continuous duration Treatment not assing		

Case Study:

Hemostasis Device and Local Adverse Events

Issue

- FDA reports in late '90s of serious injuries and deaths
- Gender?

Process

- Phase I- 214 hospitals; 2001
- >166,000 procedures... found HCDs to be protective against complications

wris et al. , J Invasive Cardiol 2005; 17:644-650



Developed and implemented new data collection form

- Time to hemostasis
- Time to ambulation
- Sheath size
- Methods of hemostasis
- Other adverse outcomesRecruited among 150
 - sites in 2003 90 initially....59 sites
- completed Collected 1 quarters
- data...>13k procedures

Findings...

- Women had 2x risk of men for local complications... adjusted OR 1.73 "any vascular comp"
- VasoSeal demonstrated higher risk of "any vascular comp" compared to manual compression....

ny Vascular Complication	Perclose	0.86	0.62-1.18
	VasoSeal	2.38	1.47-3.85
	Angio-Seal	0.99	0.77-1.28
	Chito-Seal	0.63	0.35-1.12
	Syvek Patch	1.10	0.66-1.83
	Mechanical Compression	0.84	0.59-1.18





Goals of Distributed Network-Active Surveillance

- Accuracy
- Acuity
- Efficiency
- Speed

.....Clinical registries can be used as a component of an elegant system of event detection......

Challenges

- · Accessing data from disparate sources
 - Lack of harmonization of data elements and definitions
 CCHIT, NIH Roadmap, LOINC, etc
 - Lack of device bar coding to facilitate accuracy of data collection
 - Electronic medical records vs clinical registries- HIT conundrum
- Solution: Opportunity through this project to establish and **implement** standards

Challenges

- Legal issues accessing and using data – Hospitals own their own data
 - ACC owns aggregated data
- Solution: Only make available limited, deidentified dataset

Challenges

- Legal, privacy and security issues in tracking events across health care settings
 - De-identified patient level data. Difficult to reidentify for purposes of event tracking
 State confidentiality laws growing issue
 - Privacy and security issues prevail
 - Balance between research and surveillance
- Solution: IRB review required if structured safety surveillance program

Challenges

- Analytical complexities in combining data
 - De-identified patient level data
 - Need to have same protocol
 - Appropriate statistical methods
- Solution: Use agreed upon probabilistic matching methods; Use same protocol for extracting data

Challenges

- Legal and Privacy complexities combining data sets
 - De-identified patient level data. Difficult to reidentify for purposes of event tracking
 - State confidentiality laws growing issue
 - Ownership of data at hospital level, not at professional society
- Solution: Establish firewall; Data must stay within it; PHI can't be shared

Challenges

• Flexibility in data capture

- Web-based platform easier to capture data on new devices vs software vendors
 - CathPCI Registry 22 certified vendors... Can be done, but painful
- Solution: Implement extensible data collection fields to readily capture new devices, meds

Challenges

- Accuracy and adjudication of events
 - Validating events critical to assessing causality
 - Data quality varies
 - Clinical registries often focused on QI. Different standard of data quality than needed for PMS
- Solution: Relies upon achieving levels of data quality- completeness, consistency, and accuracy; Implementing data standards





Key Concerns

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- Patient privacy and data security
- Accuracy

Slide 2

Expanding the Uses of Health Plan Electronic Data

Core purpose of claims system designs
 - Care purpose of claims system designs
 - Claims purpose
 - Claims
 - Cl

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Slide

Key Concerns

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- Patient privacy and data security
- Accuracy
- Speed
- Liability

Slide 4

- Conflict of interest
- Disintermediation