

# Advances in Drug Safety Surveillance Infrastructure in the US FDA Sentinel

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# Disclaimer

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# Agenda

- 01 What is Sentinel?
- 02 Data Infrastructure: RWE -DE
- **O3** Methodological Initiatives



### Public Law 110–85 110th Congress

### An Act

To amend the Federal Food, Drug, and Cosmetic Act to revise and extend the user-fee programs for prescription drugs and for medical devices, to enhance the postmarket authorities of the Food and Drug Administration with respect to the safety of drugs, and for other purposes.

Sept. 27, 2007 [H.R. 3580]

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

### SECTION 1. SHORT TITLE.

This Act may be cited as the "Food and Drug Administration Amendments Act of 2007".

Food and Drug Administration Amendments Act of 2007. 21 USC 301 note.

### SEC. 905. ACTIVE POSTMARKET RISK IDENTIFICATION AND ANALYSIS.

- (a) IN GENERAL.—Subsection (k) of section 505 of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 355) is amended by adding at the end the following:
  - "(3) ACTIVE POSTMARKET RISK IDENTIFICATION.—
  - "(A) DEFINITION.—In this paragraph, the term 'data' refers to information with respect to a drug approved under this section or under section 351 of the Public Health Service Act, including claims data, patient survey data, standardized analytic files that allow for the pooling and analysis of data from disparate data environments, and any other data deemed appropriate by the Secretary.
  - "(B) DEVELOPMENT OF POSTMARKET RISK IDENTIFICA-TION AND ANALYSIS METHODS.—The Secretary shall, not later than 2 years after the date of the enactment of the Food and Drug Administration Amendments Act of 2007, in collaboration with public, academic, and private entities—
    - "(i) develop methods to obtain access to disparate data sources including the data sources specified in subparagraph (C);
    - "(ii) develop validated methods for the establishment of a postmarket risk identification and analysis system to link and analyze safety data from multiple sources, with the goals of including, in aggregate—
      - "(I) at least 25,000,000 patients by July 1, 2010; and
      - "(II) at least 100,000,000 patients by July 1, 2012; and
  - "(iii) convene a committee of experts, including individuals who are recognized in the field of protecting data privacy and security, to make recommendations to the Secretary on the development of tools and methods for the ethical and scientific uses for, and communication of, postmarketing data specified under subparagraph (C), including recommendations on the development of effective research methods for the study of drug safety questions.
  - "(C) Establishment of the postmarket risk identi-FICATION AND ANALYSIS SYSTEM.—
    - "(i) IN GENERAL.—The Secretary shall, not later than 1 year after the development of the risk identification and analysis methods under subparagraph (B), establish and maintain procedures—

SEC. 905. ACTIVE POSTMARKET RISK IDENTIFICATION AND ANALYSIS.

later than 2 years after the date of the enactment of

Establishment to f (i) avelop methods to obtain access to disparate

An Act

data sources including the data sources specified in postmarket risk identification and analysis system

SECTION 1. SHORT TITLE.

Public Law 110–85 110th Congress

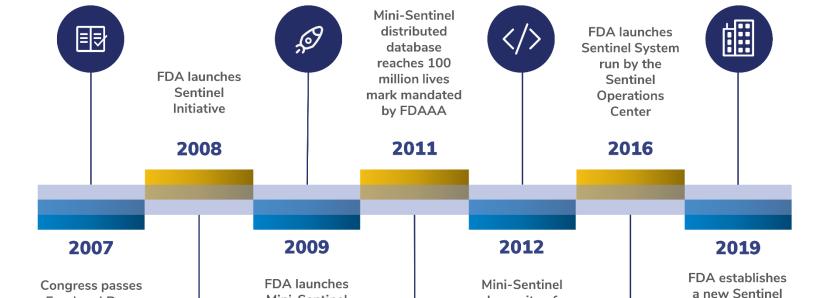
sources, with the goals of including,

data privacy and security, to make recommendations to the Secretary on the development of tools and

# **FDA's Sentinel System**

2007 FDA Amendments Act mandates FDA to establish active surveillance system for monitoring safety of drugs using electronic healthcare data

Through the Sentinel Initiative, FDA aims to assess the post-marketing safety of approved medical products



has suite of

reusable

programming

tools for routine

queries

Mini-Sentinel

**Pilot Program** 

Food and Drug

Administration

**Amendments** 

Act (FDAAA)

FDA

**History of the Sentinel Initiative** 

Sentinel

Innovation

Center and

Community

**Building &** 

**Outreach Center** 

# **Sentinel Distributed Database (SDD)**

- 1. Aetna, a CVS Health company
- 2. Carelon Research/Elevance Health
- Duke University School of Medicine: Department of Population Health Sciences (Medicare Fee-for-Service and Medicaid data)
- 4. HealthPartners Institute
- 5. Humana, Inc.
- 6. Kaiser Permanente Colorado Institute for Health Research
- 7. Kaiser Permanente Hawai'i, Center for Integrated Health Care Research
- 8. Kaiser Foundation Health Plan of the Mid-Atlantic States, Inc.
- 9. Kaiser Permanente Northwest Center for Health Research
- 10. Kaiser Permanente Washington Health Research Institute
- 11. Marshfield Clinic Research Institute
- 12. Optum
- 13. Vanderbilt University Medical Center, Department of Health Policy (Tennessee Medicaid data)

500.1 million unique patient identifiers (2000-2024)\*

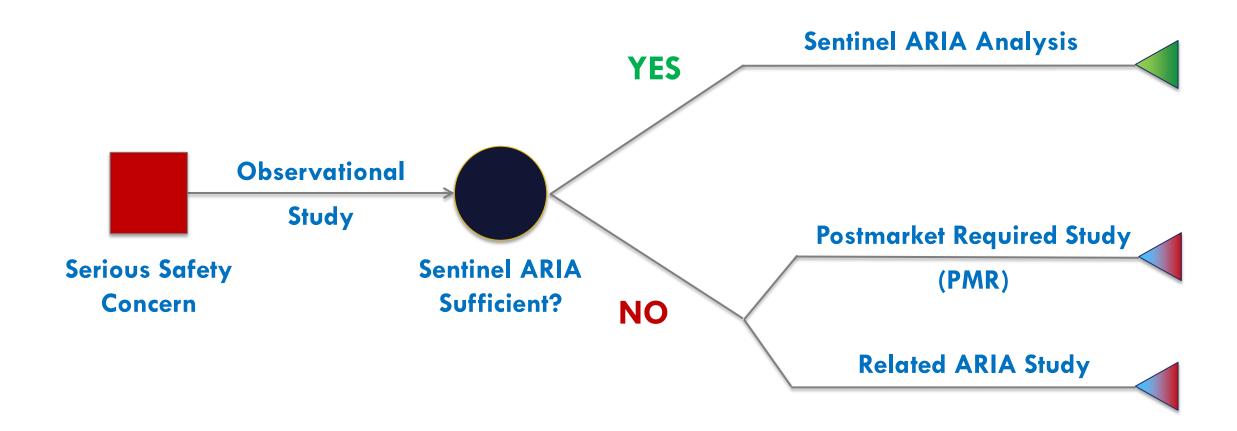
**128.7 million members** currently accruing new data

**22.3 billion** pharmacy dispensings

**24 billion** unique medical encounters

<sup>\*</sup>Potential for double-counting if individuals moved between Data Partner health plans.

# **ARIA (Active Risk Identification and Analysis)**



# Impact of ARIA

133 safety concerns initiated in ARIA, 2016 - 2021

79 (59%) safety concerns currently being evaluated 54 (41%) safety concerns with completed assessments

For 17 safety concerns, FDA determined that no regulatory action was needed

For 12 safety concerns, Sentinel assessments informed labeling changes

For 11 safety concerns, Sentinel assessments supported FDA Advisory Committee meetings

For 5 safety concerns, Sentinel assessments informed FDA Drug Safety Communications

For 3 safety concerns, Sentinel assessments informed feasibility or utility of an ongoing PMR

For 2 safety concerns, Sentinel assessments informed requests by another federal agency

For 1 safety concern, Sentinel assessments assisted with an FDA response to a public inquiry

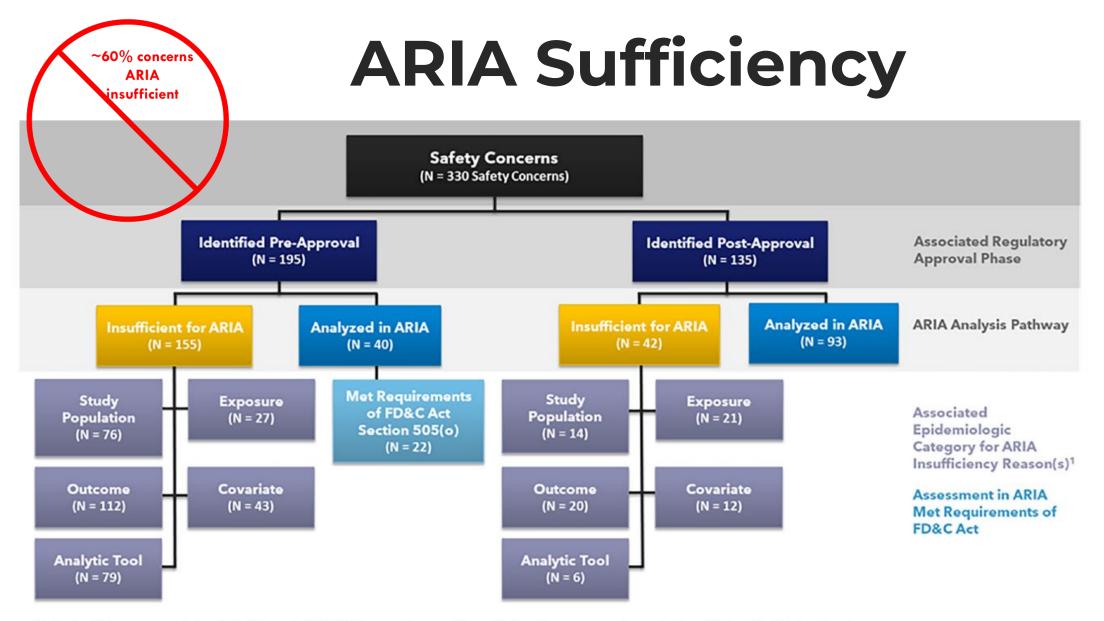
For 1 safety concern, Sentinel assessments informed clinical trial development

For 1 safety concern, Sentinel assessments informed NDA/BLA review

For 7 safety concerns, Sentinel assessments resulted in other regulatory actions

ARIA: Active Risk and Identification Analysis. BLA: Biologics License Application. NDA: New Drug Application. PMR: Postmarket Requirement.

Maro et al. CPT. 2023 Sentinel System



<sup>1</sup>A single safety concern may be insufficient for analysis in ARIA for several reasons; thus, a single safety concern may be counted in multiple epidemiologic categories. ARIA: Active Risk Identification & Analysis. FD&C Act: Federal Food, Drug, and Cosmetic Act.

Maro et al. CPT. 2023

Sentinel System

# **ARIA Insufficiency Reasons**

Table 4 Reasons for determinations of ARIA insufficiency

Reasons for insufficiency	Number of determinations	Example	Direction of future development
Insufficient supplemental structured clinical data	89	Lack of laboratory, imaging, or vital signs data	Addressable with the addition of EHR data elements into ARIA 35,36
Inability of ARIA tools to perform required analysis	82	Insufficient signal identification tool	ARIA has integrated signal identification abilities ( <b>Figure 1</b> ) <sup>16–18</sup>
Study requires data elements captured in unstructured clinical data, such as clinical notes	73	Lack of radiology or pathology findings in notes	Addressable with development of feature engineering capabilities to extract and structure these data <sup>37</sup>
Absence of validated code algorithm	72	No gold-standard chart review was performed for outcome of interest	Sentinel has performed several gold standard chart validations 38-42 but these require substantial resources. Efforts underway to investigate rapid silver standard reviews.
Identification of clinical concepts with available code algorithms/terminologies is not possible or inadequate	60	Codes do not exist for concept or validated performance characteristics are inadequate	Potentially addressable with added EHR elements but if outcome is not well-defined or new (e.g., long COVID), there may be substantial hurdles to identification
Inadequate sample size	57	Low uptake of drug	Non-actionable as ARIA is the largest system of its kind
Requires linkage to additional data source that is unavailable	52	Inability to ascertain cause of death	Additional linkages are possible with significant financial resources
Insufficient observation time available	44	Inability to follow patients across healthcare plans or systems	Actionable with substantial further research and development and resolution of data governance issues <sup>43</sup>
Insufficient mother-infant linkage	24	Lack of ability to connect mothers and infants	Resolved with 2018 integration of Mother- Infant Linkage table <sup>15</sup>
Insufficient inpatient data	18	Inability to access granular inpatient pharmacy information	Resolved with partnerships with inpatient healthcare systems 10
Inability to identify over-the-counter medication use	8	Over-the-counter medication use not captured	Inherent limitation of both claims and EHR data
Insufficient race capture of information on race	3	Race is not well-captured	FDA is working with Data Partners to understand approaches for better capture of this data
Insufficient representation of the population of interest	1	Limited generalizability based on commercial claims data	Sentinel added Medicare data in 2018 and Medicaid in 2022

ARIA, Active Risk Identification and Analysis; COVID, coronavirus disease; EHR, electronic health record; FDA, US Food and Drug Administration.

## Recognizing the need to harness alternative data sources and methods

### Perspective

Using and improving distributed data networks to generate actionable evidence: the case of real-world outcomes in the Food and Drug Administration's Sentinel system

Jeffrey S. Brown , Judith C. Maro, Michael Nguyen, and Robert Ball

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### PERSPECTIVE

OPEN

Broadening the reach of the FDA Sentinel system: A roadmap for integrating electronic health record data in a causal analysis framework

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# The FDA Sentinel Real World Evidence Data Enterprise (RWE-DE)

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American Journal of Epidemiology, 2024, 00, 1–7

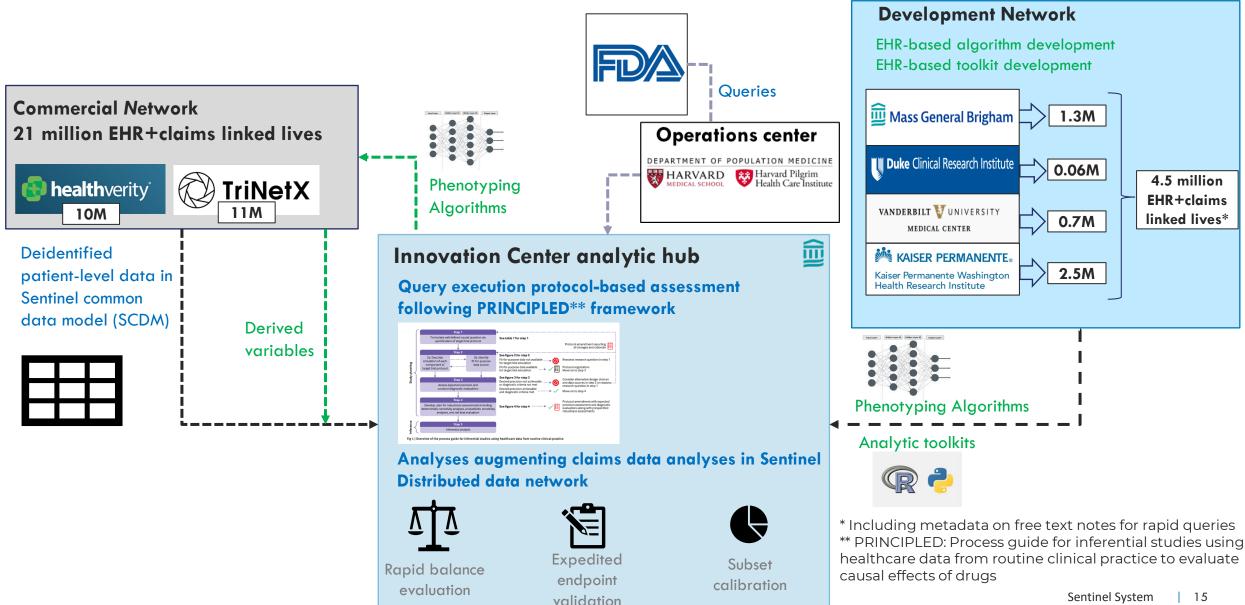
https://doi.org/10.1093/aje/kwae226 Advance access publication date July 16, 2024 Invited Commentary

A future of data-rich pharmacoepidemiology studies: transitioning to large-scale linked electronic health record + claims data

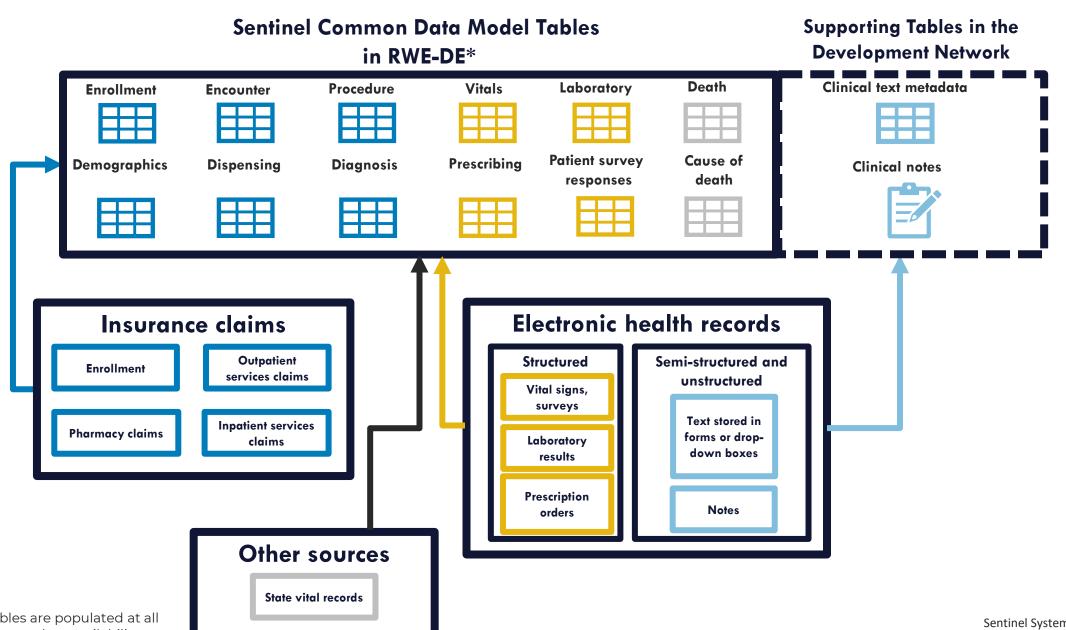
Sebastian Schneeweiss\*, 1 (b), Rishi J. Desai 1 (b), Robert Ball 2

# Real World Evidence Data Enterprise (RWE-DE)

# The Sentinel RWE-DE based on EHR+claims data today



# Data Sources and Availability in the RWE-DE



# Overview of the Data Sources at RWE-DE Sites

	Comn	nercial Network	Development Network			
Data partner	HealthVerity <sup>a</sup>	TriNetX	Mass General Brigham	Duke University Health System <sup>a</sup>	Vanderbilt University Medical Center	Kaiser Permanente of Washington
Population Size	10000000	11460383	1 2 6 8 1 3 1	63492	724656	2491864
Data range	2018-2019	2010-2023	2000-2020	2014-2017	2000-2023	2004-2022
EHR source	Ambulatory care EHRs from three sources	20 unique Health Care Organizations (HCOS)	Mass General Brigham system (2000–2020)	Duke University Health System (2014–2017)	Vanderbilt University Medical Center (2010–2023)	Kaiser Permanente Washington (2004–2022)
Claims source	Closed medical claims from over 150 payers, closed pharmacy claims from a large pharmacy benefit manager	Closed claims data from more than 150 payers	Medicare fee-for- service (2007–2020) and Massachusetts Medicaid (2000–2018)	Medicare fee-for-service (2014–2017)	Tennessee Medicaid (2000–2021)	Kaiser Permanente Washington (2004–2022)
Linkage characterization						
Length of enrollment in claims (median, IQR months)	24 (20-24)	43 (20–76)	71 (36–120)	42 (41–48)	84 (41–148)	32 (12–73)
Number of EHR encounters with data contributed to SCDM (median, IQR)	5 (2-9)	5 (2–15)	15 (5–46)	24 (7–31)	5 (2–15)	8 (3–22)
% with > 0 overlapping person time where information is contributed in SCDM by claims and EHRs concurrently	93.3%	37.6%	62.2%	100%	53.7%	47.9%
Among those with overlapping person-time where information is contributed in SCDM by claims and EHRs concurrently > 0, median, IQR months of overlap	10 (2–17)	19 (2–51)	43 (12–97)	33 (15–43)	24 (2–70)	30 (5-90)

aFor HealthVerity and DUHS, population was enriched by sampling for patients who have more person-time overlap between claims and EHRs (see text for additional information on sampling).

# Overview of the Populations Covered in RWE-DE

TABLE 2 | Patient population characterization in the RWE-DE.

	<b>Commercial Network</b>		Development Network			
Data partner	HealthVerity	TriNetX	Mass General Brigham	Duke University Health System	Vanderbilt University Medical Center	Kaiser Permanente of Washington
Population size	10000000	11460383	1 268 131	63492	724656	2491864
Basic demographics						
Age groups						
0-1 years	0.00%	0.00%	0.00%	0.00%	0.69%	5.76%
2-4years	1.70%	1.70%	0.20%	0.00%	2.64%	2.98%
5-9 years	5.30%	4.50%	0.80%	0.00%	7.76%	4.87%
10-14 years	5.40%	5.60%	1.40%	0.00%	10.85%	5.13%
15-18 years	4.70%	4.90%	1.40%	0.00%	8.26%	5.41%
19-21 years	3.60%	4.00%	1.20%	0.00%	5.76%	4.99%
22-44 years	27.00%	36.70%	15.50%	0.00%	33.14%	39.97%
45-64 years	34.80%	26.80%	14.90%	29.53%	17.90%	25.33%
65-74 years	11.10%	10.00%	19.50%	48.58%	6.47%	3.47%
75+ years	6.30%	5.40%	45.10%	21.88%	6.53%	2.09%
% Black	N/A	17.20%	6.40%	19.03%	16.98%	2.26%
% White	N/A	61.30%	72.40%	76.24%	55.69%	33.19%
% Unknown	N/A	21.6%	19.5%	2.4%	25.90%	57.29%
% Female	59.80%	50.90%	56.80%	57.73%	57.75%	52.20%
% Male	40.20%	49.10%	43.20%	42.27%	42.25%	47.80%

Abbreviation: N/A, information not available in SCDM.

# Methodological Initiatives

# Causal Inference Requirements

### Design Layer

### Achieve causal study design

Considering:

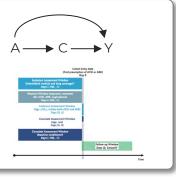
- Study question
- Exposure variation
- Measurement quality

### DESIGN CHOICE

- 1) Controlled 2) self-controlled 3) scanning
- Medically-informed target population
- Patient-informed outcomes
- Biologically-informed effect window

### **BIAS REDUCTION**

- New users, active comparators
- Causal temporality Exposure before outcome Confounder before exposure



Measures Layer

### Achieve fitfor-purpose measurement

Considering:

- sensitivity
- specificity,
- completeness
- mean sqr diff

infusers, pill caps, **UDI from OR notes** 

**EXPOSURE** 

Filling Rx

self-report,

Prescribing Rx,

### Dx, Px codes

Labs, imaging, digital health dev, physician notes, patient reports



**OUTCOME** 

### Dx, Px, Rx codes

Labs, stage, imaging, BMI, genomics, physician notes, services use intensity



*CONFOUNDERS* 

### Dx, Px, Rx codes

Monitors, physician notes, biomarker, omics, behavior, socioecon



Analytics Layer

### **Achieve** causal analysis

Considering:

- Confounders
- Follow-up model
- Measurement quality

### **BALANCE**

- Regression, PS analysis
- Time-varying exposure: MSM
- Check balance: SD, residuals, c-stat

### ROBUSTNESS

- Sensitivity analyses of design
- Quantitative bias analysis
- Neg./pos. control endpoints
- Balance in unmeasured confounders
- Multiple comparisons

- Achieve balance:
- Proxy adjustment: HDPS, CTMLE

# **Causal Inference Requirements**

Design Layer Achieve causal study design Considering:

- Study question
- Exposure variation
- Measurement quality

Activity: Outline a framework to help Sentinel Investigators adhere to robust causal inference principles

Measures Layer

Analytics Layer



# Process guide for inferential studies using healthcare data from routine clinical practice to evaluate causal effects of drugs (PRINCIPLED): considerations from the FDA Sentinel Innovation Center

Rishi J Desai, <sup>1</sup> Shirley V Wang, <sup>1</sup> Sushama Kattinakere Sreedhara, <sup>1</sup> Luke Zabotka, <sup>1</sup> Farzin Khosrow-Khavar, <sup>1</sup> Jennifer C Nelson, <sup>2</sup> Xu Shi, <sup>3</sup> Sengwee Toh, <sup>4</sup> Richard Wyss, <sup>1</sup> Elisabetta Patorno, <sup>1</sup> Sarah Dutcher, <sup>5</sup> Jie Li, <sup>5</sup> Hana Lee, <sup>5</sup> Robert Ball, <sup>5</sup> Gerald Dal Pan, <sup>5</sup> Jodi B Segal, <sup>6</sup> Samy Suissa, <sup>7</sup> Kenneth J Rothman, <sup>8</sup> Sander Greenland, <sup>9</sup> Miguel A Hernán, <sup>10</sup> Patrick J Heagerty, <sup>11</sup> Sebastian Schneeweiss <sup>1</sup>

For numbered affiliations see end of the article

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Additional material is published online only. To view please visit the journal online.

Citethisas: BM/2024;384:e076460 http://dx.doi.org/10.1136/ This report proposes a stepwise process covering the range of considerations to systematically consider key choices for study design and data analysis for non-interventional studies with the central objective of fostering generation of

Non-interventional studies, also referred to as observational studies, are conducted using real world data sources typically including healthcare data that are generated during provision of routine clinical care (including health insurance claims and electronic health records). These studies provide an opportunity to fill in evidence gaps for questions that have not been answered by randomized trials. However, generating decision grade evidence from healthcare data requires

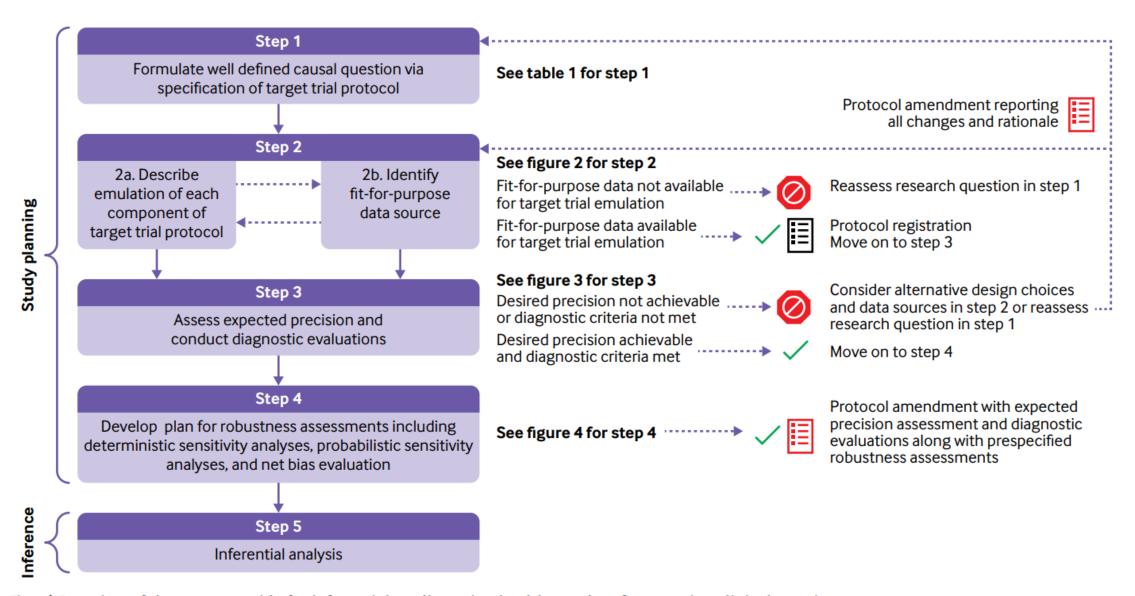


Fig 1 | Overview of the process guide for inferential studies using healthcare data from routine clinical practice

# Causal Inference Requirements: Role of Advanced Methods

### Design Layer

Achieve causal study design

Considering:

- Study question
- Exposure variation
- Measurement quality

**Activity: Outline a framework to help Sentinel Investigators adhere** to robust causal inference principles

### Measures Layer

Achieve fitfor-purpose measurement

Considering:

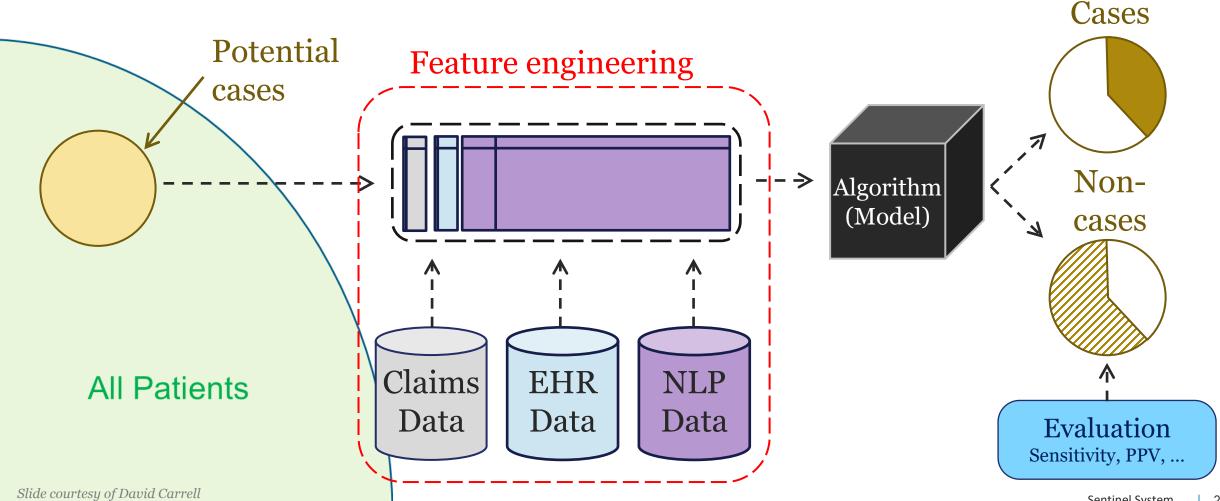
- sensitivity
- specificity,
- completeness
- mean sgr diff

**Activity: Natural language processing and computable phenotyping** to identify health conditions of interest incompletely captured with Dx, Px, or Rx codes

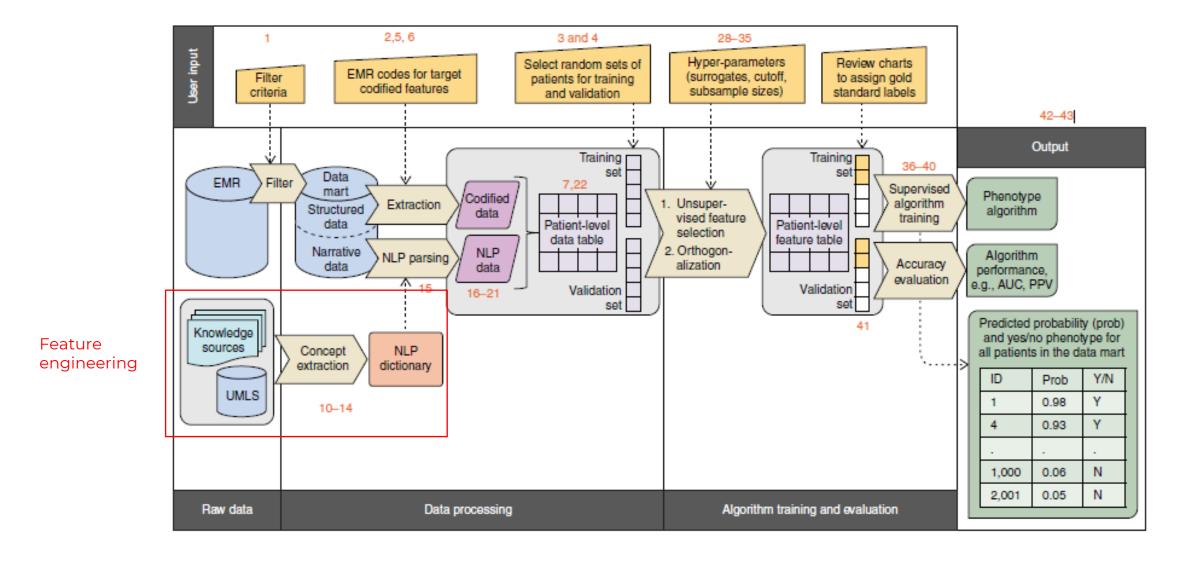
Analytics Layer

# What is computable phenotyping?

Use of algorithms (or models) to determine which patients have a particular clinical condition (AKA phenotype, health outcome of interest, "is a case")



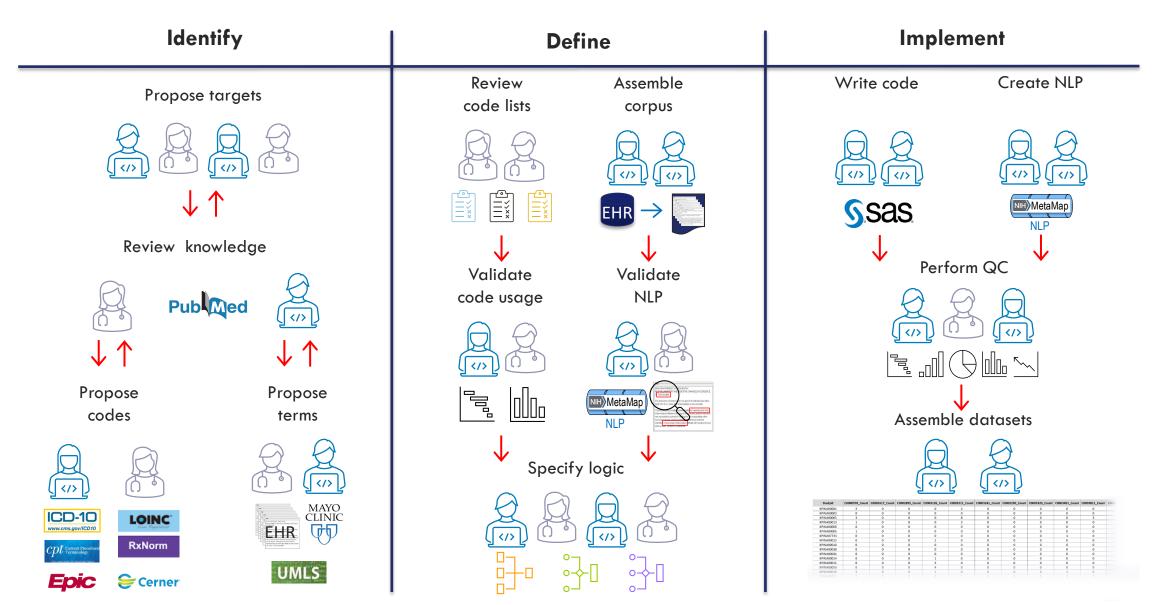
# **High throughput phenotyping - steps**



Zhang et al. *Nat protocols*. 2019

# Feature Engineering: Manual





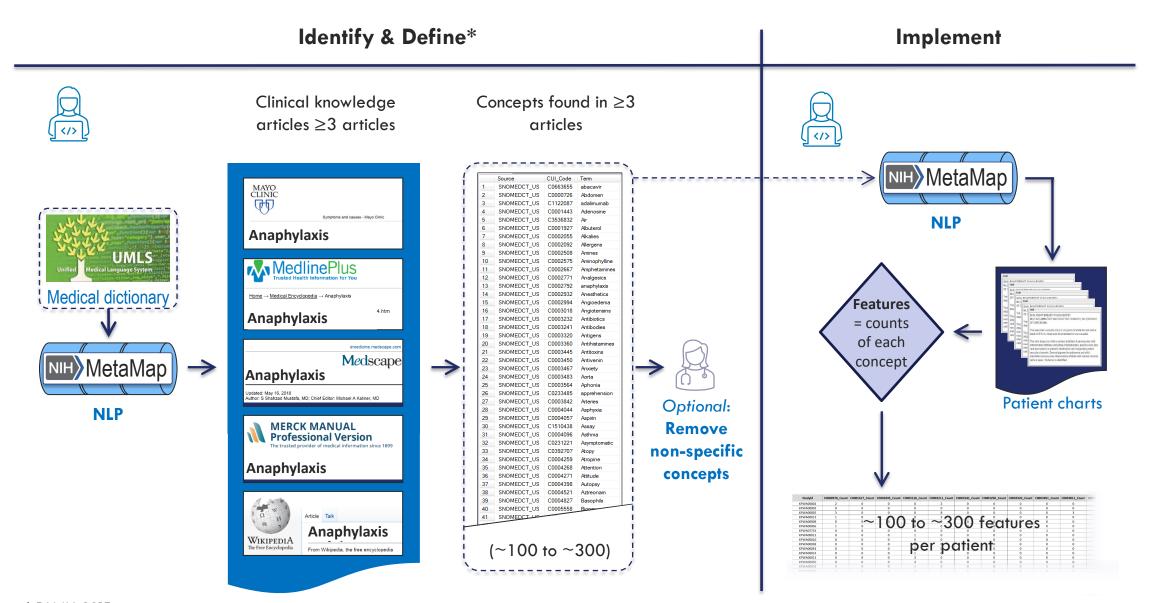
# Feature Engineering: Manual



Identify	Define	Implement

# Feature Engineering: Automated





# Feature Engineering: Automated



# Identify & Define

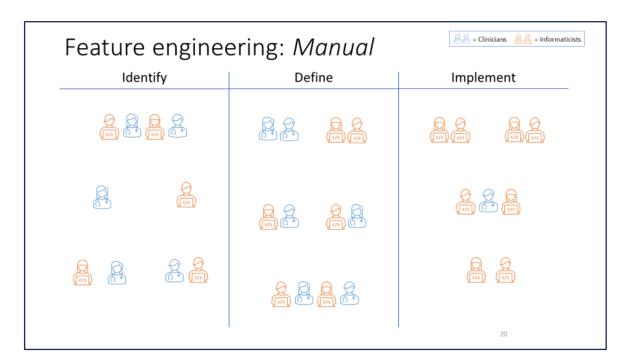


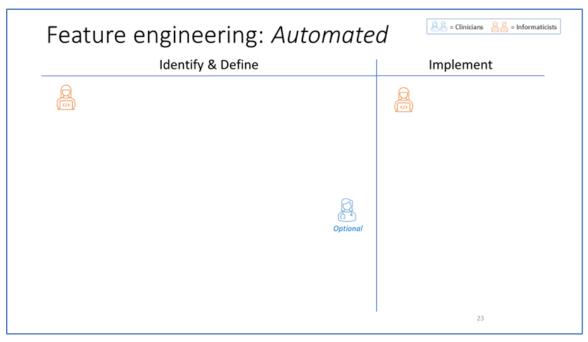






# Feature Engineering: Manual vs. Automated





Slide courtesy of David Carrell

Sentinel System

# **Breakout activity**

What are some of the strengths and limitations of the automated approach versus manual approach?

# **Strengths and limitations**

### Automation advantages:

- Short development time
- Low/no expenditure for domain expertise
- Reduced operator dependence
- Highly replicable

### Automation limitations:

• Unclear if the performance is compromised versus a manual approach

Will it work? As a starting point? As an overall solution?

# Feature Engineering Example: Automated (NLP)

### **High-severity COVID-19 disease (red, N=51)**

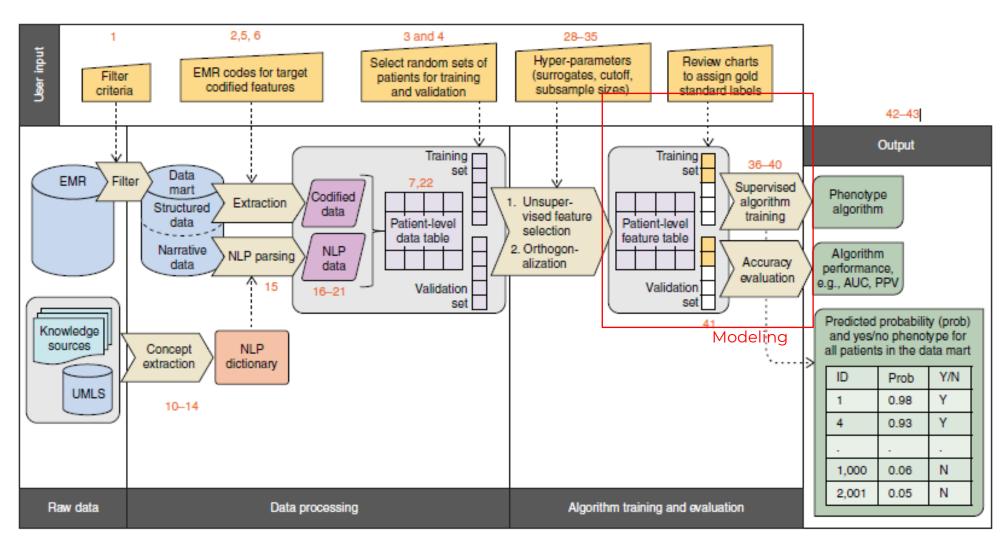
#	CONCEPT	CUI
1		C000097
1	acetaminophen	0
2	Adrenal Cortex Hormones	C0001617
3	air	C3536832
4	Anemia, Sickle Cell	C0002895
5	Angiotensin II receptor antagonist	C0521942
6	animal allergen extracts	C3540698
7	Anosmia	C0003126
8	Antibodies	C0003120
9	Antibodies, Neutralizing	C0475463
10	Antibodies, Neutralizing  Antibody studies (procedure)	C0473403
11	Antibody Studies (procedure)  Antibody Therapy	C0380327
12	Antigens	C0003320
14	Anti-Inflam. Agents, Non-	
13	Steroidal	C0003211
14	Antimicrobial Susceptibility	C2827758
	Result	
15	Antiviral Agents	C0003451
16	Arthralgia	C0003862
17	Asymptomatic (finding)	C0231221
18	At home	C4534363
19	baricitinib	C404494 7
20	Blood Clot	C0302148
21	Blood coagulation tests	C000579 0
22	Body mass index procedure	C0005893
23	Brain Diseases	C0006111
24	Bronchoalveolar Lavage	C1535502
25	Cardiac Arrhythmia	C0003811
		C087854
26	Cardiomyopathies	4
27	Cerebrovascular accident	C003845 4
28	Chemical Association	C0596306
29	Chest CT	C0202823
30	Chest Pain	C0008031
31	Chills	C0085593
		C0003333
32	chloroquine	9
33	Chronic Kidney Diseases	C1561643
	Chronic Obstructive Airway	l

#	CONCEPT	CUI
41	Coronary Arteriosclerosis	C001005 4
42	Coughing	C001020 0
43	COVID19 (disease)	C520367 0
44	COVID-19 drug treatment	C524404 8
45	C-reactive protein	C000656 0
46	Critical Illness	C001034 0
47	Cystic Fibrosis	C001067 4
48	Death (finding)	C1306577
49	Death Related to Adverse Event	C1705232
50	Decreased translucency	C002905
51	Delta-Like Protein 1, human	C3815527
52	Device Alert Level - Serious	C1551395
53	Device Alert Level - Critical	C1551396
54	dexamethasone	C0011777
55	Diabetes Mellitus	C0011849
56	Diabetes Mell., Non-Ins- Depend.	C0011860
57	Diagnostic Imaging	C0011923
58	Diarrhea and vomiting, symptom	C047449 6
59	Diffuse Optical Imaging	C389937 9
60	Down Syndrome	C001308 0
61	Dyspnea	C001340 4
62	Emergency Situation	C0013956
63	Environmental air flow	C004249
64	Extracorp. Membrane Oxygen.	C0015357
65	Fatigue	C0015672
66	Ferritin	C001587 9

#	CONCEPT	CUI
81	Hypersensitivity	C002051 7
82	Hypertensive disease	C002053 8
83	Hypoxemia	C070029 2
84	Hypoxia	C024218 4
85	Immune System Finding	C1291764
86	Immunocompromised Host	C008539 3
87	Immunoglobulins	C002102 7
88	Improved - answer to question	7 C408420 3
89	Inflammation	C002136 8
90	Interferons	C002174 7
91	interleukin-6	7 C002176 0
92	Isolation procedure	C020472 7
93	ivermectin	C002232 2
94	Lactate Dehydrogenase	C0022917
95	lopinavir / ritonavir	C093923 7
96	Loss of taste or smell	C538203
97	Lung consolidation	C0521530
98	Lung diseases	C0024115
99	Lymphopenia	C0024312
100	M Protein, multiple myeloma	C070027
101	Malaise	C0231218
102	Mechanical ventilation	C019947 0
103	Mechanical Ventilator	C004249 7
104	methylprednisolone	C0025815
105	Mild Adverse Event	C1513302
400	Managlanal Antibodies	C000325

#	CONCEPT	CUI
121	Pharyngitis	C0031350
122	Plain chest X-ray	C003998
122	Plain Chest X-ray	5
123	Plasma Product	C4521445
124	Pneumonia	C0032285
125	Pneumonia, Viral	C0032310
126	Pressure- physical agent	C0033095
127	Pulmonary (intended site)	C4522268
128	Quarantine	C003438
129	receptor	C0597357
130	Reduction procedure	C1293152
131	remdesivir	C4726677
132	Respiration Disorders	C003520 4
133	Respiratory distress	C0476273
	Respiratory Distress Synd.,	
134	Adult	C0035222
135	Respiratory Failure	C1145670
		C042544
136	Respiratory System Finding	2
137	Rhinorrhea	C1260880
138	RNA, Messenger	C0035696
139	Self-Quarantine	C5392942
140	Septic Shock	C003698
141	Severe (severity modifier)	C020508 2
142	Severe Acute Resp. Syndrome	C1175175
143	Cayara diagasa	C474069
143	Severe disease	2
144	Shock	C003697
144	SHOCK	4
145	Signs and Symptoms,	C003709
143	Respiratory	0
146	Sneezing	C0037383
147	Steroids	C0038317
148	Supplemental oxygen	C4534306
149	Symptom mild	C0436343
150	Symptom severe	C0436345
151	Symptomatic Presentation	C5238876
152	Thromboembolism	C004003
152	THOTTBOURN	8

# **High throughput phenotyping - steps**



Sentinel System

# **Modeling Overview (Illustrative)**

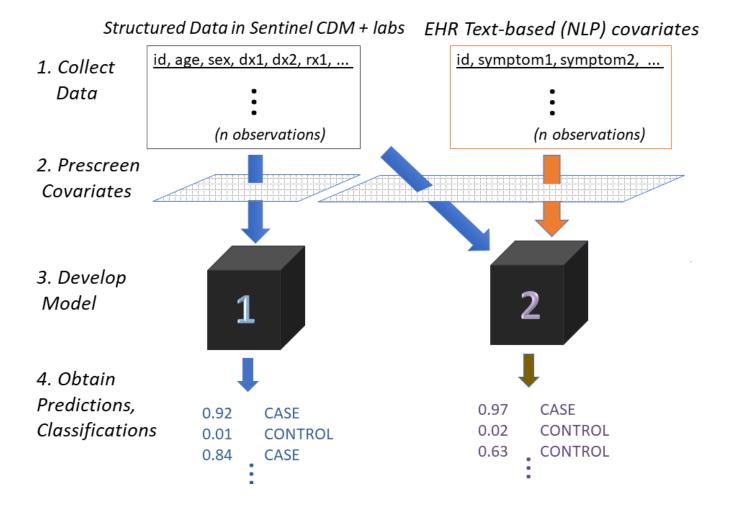
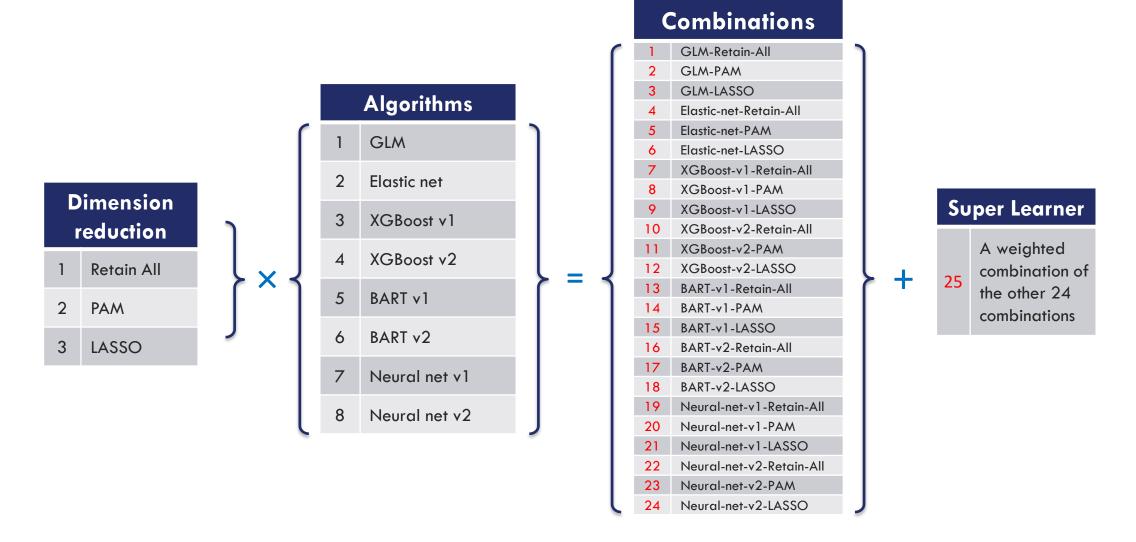


Image courtesy of Susan Gruber
Sentinel System

## **Modeling Overview (Illustrative)**



Slide courtesy of David Carrell

Sentinel System

## **Example Results: Computable Phenotyping for Anaphylaxis**

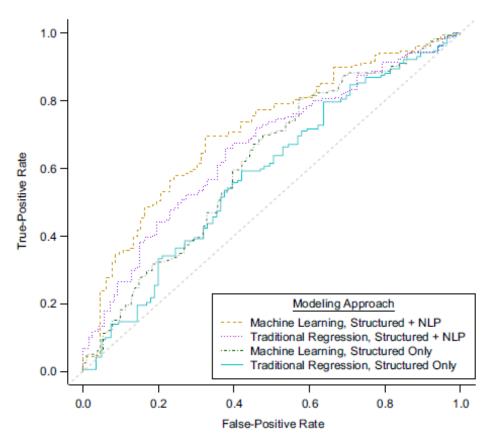


Figure 1. Weighted cross-validated area under the receiver operating characteristic curve for Kaiser Permanente Washington algorithms identifying actual anaphylaxis events in Kaiser Permanente Washington data (2015–2019) using the best machine-learning approach applied to structured and all natural language processing (NLP) data, traditional logistic regression approach applied to structured data only.

## Computable Phenotyping & NLP Activities in Sentinel



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Vol. 192, No. 2 https://doi.org/10.1093/aje/kwac182 Advance Access publication: November 4, 2022

#### Practice of Epidemiology

Improving Methods of Identifying Anaphylaxis for Medical Product Safety Surveillance Using Natural Language Processing and Machine Learning

David S. Carrell\*, Susan Gruber, James S. Floyd, Maralyssa A. Bann, Kara L. Cushing-Haugen, Ron L. Johnson, Vina Graham, David J. Cronkite, Brian L. Hazlehurst, Andrew H. Felcher, Cosmin A. Bejan, Adee Kennedy, Mayura U. Shinde, Sara Karami, Yong Ma, Danijela Stojanovic, Yuegin Zhao, Robert Ball, and Jennifer C. Nelson

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#### Automated Extraction of Mortality Information from Publicly Available Sources Using Language Models

Mohammed Al-Garadi, Michele LeNoue-Newton, Michael E. Matheny, Melissa McPheeters, Jill M. Whitaker, Jessica A. Deere, Michael F. McLemore, Dax Westerman, Mirza S. Khan, José J. Hernández-Muñoz, Xi Wang, Aida Kuzucan, Rishi J. Desai, Ruth Reeves

doi: https://doi.org/10.1101/2024.10.28.24316027

### **scientific** reports



#### OPEN Scalable incident detection via natural language processing and probabilistic language models

Colin G. Walsh<sup>1,2,3,13,23</sup>, Drew Wilimitis<sup>1</sup>, Qingxia Chen<sup>1,2</sup>, Aileen Wright<sup>1</sup>, Jhansi Kolli<sup>1</sup>, Katelyn Robinson<sup>1</sup>, Michael A. Ripperger<sup>1</sup>, Kevin B. Johnson<sup>6,7,8</sup>, David Carrell<sup>9</sup>, Rishi J. Desai<sup>10</sup>, Andrew Mosholder<sup>4,5</sup>, Sai Dharmarajan<sup>4,12</sup>, Sruthi Adimadhyam<sup>11</sup>, Daniel Fabbri<sup>1</sup>, Danijela Stojanovic<sup>4,5</sup>, Michael E. Matheny<sup>1</sup> & Cosmin A. Bejan<sup>1</sup>

Journal of the American Medical Informatics Association, 2023, 1-9 https://doi.org/10.1093/jamia/ocad241

Research and Applications



#### Research and Applications

#### Data-driven automated classification algorithms for acute health conditions: applying PheNorm to COVID-19 disease

Joshua C. Smith, PhD1,\*, Brian D. Williamson, PhD2, David J. Cronkite, MS2, Daniel Park, BS1, Jill M. Whitaker, MSN1, Michael F. McLemore, BSN1, Joshua T. Osmanski, MS1, Robert Winter, BA1, Arvind Ramaprasan, MS<sup>2</sup>, Ann Kelley, MHA<sup>2</sup>, Mary Shea, MA<sup>2</sup>, Saranrat Wittayanukorn, PhD<sup>3</sup>, Danijela Stojanovic, PharmD, PhD3, Yuegin Zhao, PhD3, Sengwee Toh, ScD4, Kevin B. Johnson, MD, MS<sup>5</sup>, David M. Aronoff, MD<sup>6</sup>, David S. Carrell , PhD<sup>2</sup>

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### Causal Inference Requirements: Role of Advanced Methods

#### Design Layer

Achieve causal study design

Considering:

- Study question
- Exposure variation
- Measurement quality

Activity: Outline a framework to help Sentinel Investigators adhere to robust causal inference principles

#### Measures Layer

Achieve fitfor-purpose measurement

Considering:

- sensitivity
- specificity,
- completeness
- · mean sqr diff

Activity: Natural language processing and computable phenotyping to identify health conditions of interest incompletely captured with Dx, Px, or Rx codes

Analytics Layer Achieve causal analysis

Considering:

- Confounders
- Follow-up model

Activity: 1. Structural missing data investigations
2. Machine learning assisted analytics to enhance confounding adjustment

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## **Activity: 1. Structural Missing Data Investigations**

#### Clinical Epidemiology

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ORIGINAL RESEARCH

#### A Principled Approach to Characterize and Analyze Partially Observed Confounder Data from Electronic Health Records

Janick Weberpals (1) 1, Sudha R Raman<sup>2</sup>, Pamela A Shaw<sup>3</sup>, Hana Lee<sup>4</sup>, Massimiliano Russo<sup>1</sup>, Bradley G Hammill<sup>2</sup>, Sengwee Toh (1) 5, John G Connolly<sup>5</sup>, Kimberly J Dandreo (1) 6, Fang Tian<sup>7</sup>, Wei Liu<sup>7</sup>, Jie Li<sup>7</sup>, José J Hernández-Muñoz (1) 7, Robert J Glynn<sup>1</sup>, Rishi J Desai (1) 1

<sup>1</sup>Division of Pharmacoepidemiology and Pharmacoeconomics, Department of Medicine, Brigham and Women's Hospital, Harvard Medical School, Boston, MA, USA; <sup>2</sup>Department of Population Health Sciences, Duke University School of Medicine, Durham, NC, USA; <sup>3</sup>Biostatistics Division, Kaiser Permanente Washington Health Research Institute, Seattle, WA, USA; <sup>4</sup>Office of Biostatistics, Center for Drug Evaluation and Research, US Food and Drug Administration, Silver Spring, MD, USA; <sup>5</sup>Department of Population Medicine, Harvard Medical School and Harvard Pilgrim Health Care Institute, Boston, MA, USA; <sup>6</sup>Office of Surveillance and Epidemiology, Center for Drug Evaluation and Research, US Food and Drug Administration, Silver Spring, MD, USA

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JAMIA Open, 2024, 7(1), ooae008 https://doi.org/10.1093/jamiaopen/ooae008 Application Notes



#### **Application Notes**

## smdi: an R package to perform structural missing data investigations on partially observed confounders in real-world evidence studies

Janick Weberpals , RPh, PhD\*, Sudha R. Raman, PhD², Pamela A. Shaw, PhD, MS³, Hana Lee, PhD⁴, Bradley G. Hammill, DrPH², Sengwee Toh, ScD⁵, John G. Connolly, ScD⁵, Kimberly J. Dandreo, MS⁵, Fang Tian, PhD⁶, Wei Liu, PhD⁶, Jie Li, PhD⁶, José J. Hernández-Muñoz , PhD⁶, Robert J. Glynn, PhD, ScD¹, Rishi J. Desai, PhD¹

<sup>1</sup>Division of Pharmacoepidemiology and Pharmacoeconomics, Department of Medicine, Brigham and Women's Hospital, Harvard Medical School, Boston, MA 02120, United States, <sup>2</sup>Department of Population Health Sciences, Duke University School of Medicine, Durham, NC 27701, United States, <sup>3</sup>Biostatistics Division, Kaiser Permanente Washington Health Research Institute, Seattle, WA 98101, United States, <sup>4</sup>Office of Biostatistics, Center for Drug Evaluation and Research, United States Food and Drug Administration, Silver Spring, MD 20993, United States, <sup>5</sup>Department of Population Medicine, Harvard Medical School and Harvard Pilgrim Health Care Institute, Boston, MA 02215, United States, <sup>6</sup>Office of Surveillance and Epidemiology, Center for Drug Evaluation and Research, United States Food and Drug Administration, Silver Spring, MD 20993, United States

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**Table 2** Diagnostics to Empirically Differentiate and Characterize Missing Data Mechanisms. The Three Group Diagnostics are Composed of Analytic Models and Tests That Contextualize and Provide Information to Differentiate and Characterize Potentially Underlying Missingness Mechanisms

	Group I D	iagnostics	Group 2 Diagnostics	Group 3 Diagnostics	
Diagnostic metric	Absolute Standardized Mean Difference (ASMD)	P-value Hoteling <sup>21</sup> / Little <sup>22</sup>	Area Under the Receiver Operating Curve (AUC)	Log HR (Missingness Indicator)	
Purpose	Comparison of distributions between patients with vs without observed value of the partially observed covariate.		Assessing the ability to predict missingness based on observed covariates.	Check whether missingness of a covariate is associated with the outcome (differential missingness).	
Example value	ASMD = 0.1	p-value < 0.001	AUC = 0.5	log HR = 0.1 (0.05 to 0.2)	
Interpretation	<0.1 <sup>a</sup> : no imbalances in observed patient characteristics; missingness may be likely completely at random or not at random (~MCAR, ~MNAR). >0.1 <sup>a</sup> : imbalances in observed patient characteristics; missingness may be likely at random (~MAR).	High test statistics and low p-values indicate differences in baseline covariate distributions and null hypothesis would be rejected (~MAR).	AUC values ~ 0.5 indicate completely random or not at random prediction (~MCAR, ~MNAR).  Values meaningfully above 0.5 indicate stronger relationships between covariates and missingness (~MAR).	No association in either univariate or adjusted model and no meaningful difference in the log HR after full adjustment (~MCAR).  Association in univariate but not fully adjusted model (~MAR).  Meaningful difference in the log HR also after full adjustment (~MNAR).	

Note: \*Analogous to propensity score-based balance measures.<sup>23</sup>

Abbreviations: ASMD, Median absolute standardized mean difference across all covariates; AUC, Area under the curve; CI, Confidence interval; MAR, Missing at random mechanism in which the missingness probability depends on observed covariates; MCAR, Missing completely at random mechanism in which each patients has the same missingness probability; MNAR(unmeasured), Missing not at random mechanism in which the missingness can only be explained by a covariate which is not observed in the underlying dataset; MNAR(value), Missing not at random mechanism in which the missingness just depends on the actual value of the partially observed confounder of interest itself.



Dataframe with one row per patient and relevant variables as columns (exposure, outcome, covariates, partially observed covariates)

#### **Descriptives And Pattern Diagnostics**

Which covariates exhibit missingness? Summarize and visualize missingness:

smdi\_na\_indicator()

smdi\_check\_covar()

smdi\_summarize()

smdi\_vis()

Identify patterns visually\*:

gg\_miss\_upset()

md\_pattern()

#### Inferential Three Group Diagnostics

#### **Group 1 Diagnostics**

smdi\_amsd()

smdi\_hotelling()

smdi\_little()

#### **Group 2 Diagnostics**

smdi\_rf()

**Group 3 Diagnostics** 

smdi\_outcome()

smdi\_diagnose()

**Group 1-3 Diagnostics** 

smdi\_style\_gt()

If pattern seems non-monotone  $\rightarrow$  run diagnostics on all partially observed covariates jointly, if monotone consider running diagnostics on each partially observed covariate individually

## Activity 2. Machine Learning Assisted Analytics to Enhance Confounding Adjustment





American Journal of Epidemiology, 2024, 00, 1-9

https://doi.org/10.1093/aje/kwae023 Advance access publication date March 21, 2024 Practice of Epidemiology

# Targeted learning with an undersmoothed LASSO propensity score model for large-scale covariate adjustment in health-care database studies

Richard Wyss\*,<sup>1</sup>, Mark van der Laan<sup>2</sup>, Susan Gruber<sup>3</sup>, Xu Shi<sup>4</sup>, Hana Lee<sup>5</sup>, Sarah K. Dutcher<sup>6</sup>, Jennifer C. Nelson<sup>7</sup>, Sengwee Toh<sup>8</sup>, Massimiliano Russo<sup>1</sup>, Shirley V. Wang<sup>1</sup>, Rishi J. Desai<sup>1</sup>, Kueiyu Joshua Lin<sup>1</sup>

<sup>&</sup>lt;sup>1</sup>Division of Pharmacoepidemiology and Pharmacoeconomics, Brigham and Women's Hospital, Harvard Medical School, Boston, MA 02120, United States

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## Leveraging Unstructured EHRs for Large-Scale Proxy Adjustment

(ultra-high dimensional data)

NLP tools turn free-text notes from EHR data into structured features that can serve as proxy confounding adjustment

## Table. Example data structure for 2 cohort studies that include linked claims with NLP generated EHR features

		Sample Size		Outcome		Baseline Covariates	\$
Cohort	$N_{Total}$	$N_{Treated}$	$N_{Comparator}$	$N_{Total}$	$N_{Total}$	$N_{Predefined}$	$N^{**}_{Proxies}$
Study 1: <sup>A</sup>	21,343	13,576	7,767	899 (4.2%)	14,937	91	14,846
Study 2: <sup>B</sup>	35,031	12,872	22,159	251 (0.7%)	12,464	91	12,373

A Study 1: Effect of NSAIDs versus opioids on acute kidney injury

<sup>&</sup>lt;sup>B</sup> Study 2: Effect of high vs low-dose proton pump inhibitors (PPIs) on gastrointestinal bleeding

<sup>\*\*</sup> Number of claims and EHR features after screening those with prevalence < 0.001

## Propensity Score (PS) Models with Ultra-High Dimensional Data

Overfit PS models that include too many variables could lead to reduced covariate overlap, positivity violations

Some degree of dimension reduction is necessary– BUT ideally, without compromising bias reducing properties

Various approaches for fitting PS models available for this purpose

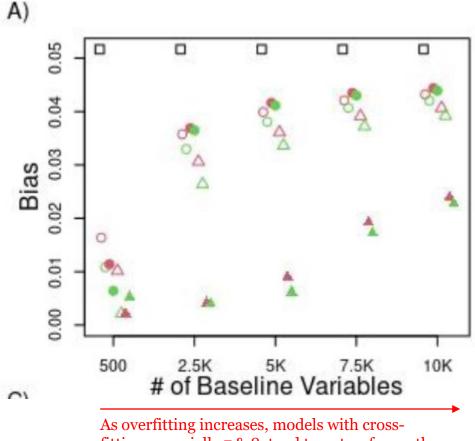
- 1. Traditional LASSO (L1 regularization with loss function based on minimizing prediction error of treatment)
- 2. Outcome adaptive LASSO (forces all variables that predict the outcome in the LASSO PS model)
- 3. Collaborative controlled LASSO (variable selection based on minimizing empirical loss of the estimate for the target causal parameter i.e treatment effect)
- 4. Collaborative controlled, outcome adaptive LASSO (combination of 2 & 3)

## **Propensity Score Models with Ultra-High Dimensional Data**

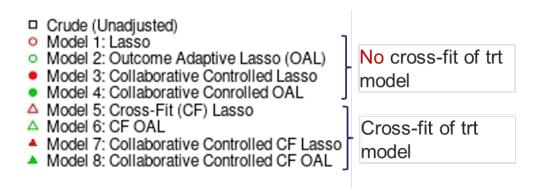
#### Use of cross-fitting to manage overfitting

- Randomly split the data into 10 equally sized non-overlapping groups. The given Lasso model trained in 9 of the groups. The trained model was then applied to the held-out group to assign PS.
- Same models described on the previous slides with cross-fitting
- 5. Traditional LASSO (L1 regularization with loss function based on minimizing prediction error of treatment)
- 6. Outcome adaptive LASSO (forces all variables that predict the outcome in the LASSO PS model)
- 7. Collaborative controlled LASSO (variable selection based on minimizing empirical loss of the estimate for the target causal parameter i.e treatment effect)
- 8. Collaborative controlled, outcome adaptive LASSO (combination of 2 & 3)

### Propensity Score Models with Ultra-High Dimensional Data: Simulation Results



As overfitting increases, models with cross-fitting, especially 7 & 8, tend to outperform other models

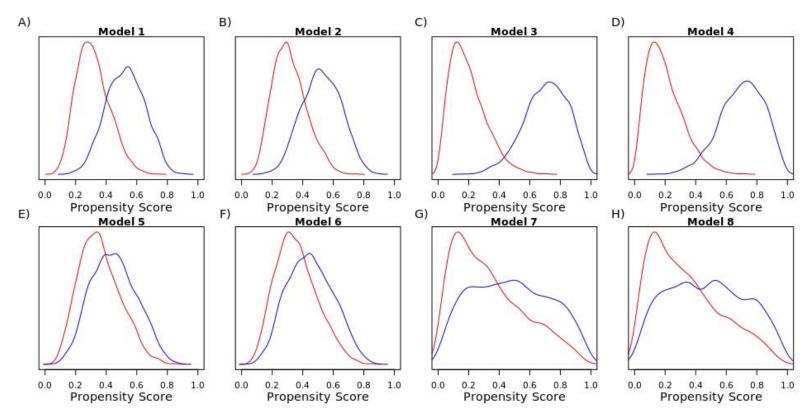


#### Take home point:

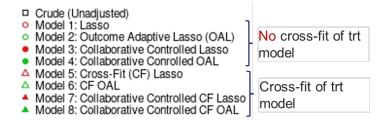
Advanced analytical approaches can allow for enhanced confounding adjustment using granular data from EHRs

Wyss et al. AJE 2024 Sentinel System

### Propensity Score Models with Ultra-High Dimensional Data: Simulation Results



Propensity score distributions for treated (blue) and comparator (red) groups for one simulated dataset consisting of 9,500 spurious variables and 500 baseline confounders that ranged in the strength of covariate effects on treatment and outcome (Scenario 5 consisting of 10,000 total baseline variables)



## What (likely) explains robust performance:

Cross fitting allows for reducing non-overlap for the overfit collaborative-controlled models

Wyss et al. AJE 2024 Sentinel System



# Software and other materials available for use

## 1. Analytical and data processing software

Goal	Tool	References
Descriptive evaluation and diagnostics for missingness in EHR-based confounding variables	SMDI (IC-developed R package)	Weberpals J, Raman SR, Shaw PA, et al. smdi: An R package to perform structural missing data investigations on partially observed confounders in real-world evidence studies. <i>JAMIA Open</i> . 2024;7(1):00ae008. doi:10.1093/jamiaopen/ooae008.
Simulation-based descriptive analysis for an unmeasured confounding to assess its impact on study results	Sim.BA (IC-developed R package)	Desai RJ, Bradley MC, Lee H et al. A simulation-based bias analysis to assess the impact of unmeasured confounding when designing nonrandomized database studies. <i>Am J Epidemiol</i> . 2024 Nov 4;193(11):1600-1608. doi: 10.1093/aje/kwae102. PMID: 38825336.
Statistical adjustment for a partially measured confounding variable with multiple imputations	MICE, MatchThem (Existing R packages used by prior Sentinel investigations)	Pishgar F, Greifer N, Leyrat C, Stuart E. MatchThem:: Matching and weighting after multiple imputation. Published online September 24, 2020. doi:10.48550/arXiv.2009.11772.
Statistical adjustment for a partially measured confounding variable with two-stage approaches (TMLE/Raking weights)	MarginalEffects (IC- developed reusable R codes)	Williamson BD, Krakauer C, Johnson E, et al. Assessing treatment effects in observational data with missing confounders: A comparative study of practical doubly-robust and traditional missing data methods. arXiv.2024/12/19;doi:10.48550/arXiv.2412.15012
Large-scale propensity scores with undersmoothing for high-dimensional confounding adjustment	CI5 (IC-developed reusable R codes)	Wyss et al. Targeted learning with an undersmoothed lasso propensity score model for large-scale covariate adjustment in healthcare database studies. <i>Am J Epidemiol</i> . 2024 <a href="doi:10.1093/aje/kwae023">doi:10.1093/aje/kwae023</a> .
NLP assisted chart review tool	CORA (Clinical Optimized Record Annotation)	Wang et al. (In Review)

## 2. Phenotype library and other models for off-the-shelf use

Phenotype	Description	References
COVID19	Algorithm using elements from structured and unstructured EHRs (Phenorm approach)	Smith JC, Williamson BD, Cronkite DJ, Park D, Whitaker JM, McLemore MF, Osmanski JT, Winter R, Ramaprasan A, Kelley A, Shea M. Data-driven automated classification algorithms for acute health conditions: applying PheNorm to COVID-19 disease. Journal of the American Medical Informatics Association. 2024 Mar 1;31(3):574-82.
Suicidal attempt Sleep related behaviors	NLP score-based approach, requires free-text notes	Walsh CG, Wilimitis D, Chen Q, Wright A, Kolli J, Robinson K, Ripperger MA, Johnson KB, Carrell D, Desai RJ, Mosholder A, Dharmarajan S, Adimadhyam S, Fabbri D, Stojanovic D, Matheny ME, Bejan CA. Scalable incident detection via natural language processing and probabilistic language models. Sci Rep. 2024 Oct 8;14(1):23429. doi: 10.1038/s41598-024-72756-7. PMID: 39379449; PMCID: PMC11461638.
Acute pancreatitis	Algorithm using structured dx, labs, and free-text; a version without free-text features is also validated, with has similar PPV	Bann et al. (in review)
Acute kidney injury	Algorithm using structured features from claims data only (PhenoSCALE approach)	Pradhan et al. (in review)
Anaphylaxis	Algorithm using elements from structured and unstructured EHRs (Phenorm approach)	Smith et al. (in review)
Cause of death	Model using structured and free-text EHR data to probabilistically assign cause of death	Al-Garadi et al. (in review)



## Summary

## **Summary**

- Large scale data infrastructure of the RWE-DE where EHRs are linked to claims data from 6 diverse data sources covering 25.5 million lives is available for use in Sentinel
- RWE-DE will offer opportunities to improve the validity of studies of medical products in clinical practice and to expand the range of questions that can be answered through Sentinel