

Monitoring Medication Use During the COVID-19 Pandemic in the Sentinel System

The Case of Anticoagulation for Thrombosis

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Disclosures

• The views expressed in this presentation represent those of the presenters and do not necessarily represent the official views of the U.S. FDA.

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- **1** The Sentinel System
- 2 Surveillance in Public Health Emergencies
- 3 Case Study: Thrombotic Events in COVID-19

Agenda



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Research

Current portfolio contains routine and COVID-19 specific Sentinel queries, as well as federally funded grant work

Doctoral dissertation investigated impact of potentially inappropriate medication use on cognitive outcomes among older adults Contact
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The Sentinel System

BACKGROUND

What is Sentinel?

- FDA's medical product **active** safety surveillance system • To assess the use, safety, and effectiveness of regulated medical products • To develop data, informatics, and methodologic capabilities to support these activities
- Key components:

Distributed data network of Data Partners
Electronic healthcare data
Common data model
Sophisticated quality assurance process BACKGROUND



BACKGROUND



Sentinel Initiative 8

SENTINEL DATA

Sentinel Ecosystem



SENTINEL DATA

Sentinel Distributed Database



- >70 million patients actively accruing new data
- Privacy preserving distributed system where data partners retain full operational control of their data
- Data lag of 6-9 months from the date of health care
- Data refreshed quarterly and quality checked to be "analysis ready"

Active Risk Identification and Analysis

• Sentinel's routine query/analysis framework



- How is ARIA used?
 - **<u>Pre-market</u>**: ARIA sufficiency assessed during PMR process
 - **Post-market**: Newly Identified Safety Signals (NISS), real-world use questions, evaluate medication errors, generic drug equivalence, evaluate REMs, etc.

INFRASTRUCTURE

Developing a Sentinel Study





Surveillance in Public Health Emergencies

What happens in an emergency?

- Traditional medical product lifecycle usually follows structured (and iterative) process
 - $_{\odot}$ FDA reviews all available evidence to decide whether to approve, license, or clear a product
- During a public health threat, medical countermeasures (MCMs) are often made available earlier in the development stage

Assessment in a Public Health Emergency

	Public Health Emergency	Traditional Research and Development
Intent	Respond and mitigate	Generalizable knowledge
Planning	Unplanned or unexpected	Planned or deliberate
Data collection	Uncontrolled or none	Well-controlled clinical trials
Environment	 Undefined number of individuals Simultaneous administration and potential use of multiple products Requires rapid decision-making 	 Defined number of individuals Stepwise progression and single product administration Allows more time for decision-making
Oversight	 Little or no tracking or monitoring Lack of or limited clinical provider interaction 	 Strict oversight and monitoring Principal investigator and clinical study staff interaction Informed consent and institutional review board
Reporting	Limited reporting and information sharing	Clearly defined reporting requirements and information sharing

First Effective Use of the EUA

- Peramivir granted EUA on 23 October 2009
- Lessons learned:
 - \circ Drug delivered to >1,100 patients within 24 hours
 - Difficult to determine the number of patients actually treated (ranges from 1,185-1,490)
 - \circ Unable to determine if any reported adverse events other than rash could be attributed to peramivir
 - $_{\odot}$ Limited data on who was treated, their response, possible ADEs, little data collected in real-time

"A crisis is a terrible thing to waste." --Paul Rohmer

MCMs in Sentinel Pre-COVID-19

• In 2018, Sentinel System began work with FDA Office of Counterterrorism and Emerging Threats (OCET)

- Activity 1: assess and/or build capacity to monitor treatments and outcomes during a public health crisis without burdening the medical system
 - Used influenza as a use-case to test readiness and novel methods for active safety surveillance

Who Gets Treated for Influenza?

Table 1. Numbers and Characteristics of Those With an Influenza Diagnosis by Outpatient Influenza Antiviral Treatment Dispensing Timing

			Baseline Characteristics in the 183 Days Prior to and Through the Day of Influenza Diagnosis					Other Ch	aracteristics	
Outpatient Dispensing Timing Relative to Diagnosis Date	Diagnoses, No. (%)	Asthma, %	COPD, %	Diabetes, %	Obesity, %	Influenza Vaccine, %	Ambulatory Encounters, Mean (SD)	Any Filled Prescriptions, Mean (SD)	Influenza Testing, %ª	Pneumococcal Vaccine, % ^b
July 1, 2014–June 30, 2015 (N=70,084,635 eligible members ^c with 1,090,333 total diagnoses ^d)										
Same day dispensing (day 0)	527,725 (48.4)	9.1	4.6	11.8	6.3	35.1	7.4 (8.5)	12.3 (13.5)	71.2	24.7
Dispensed days 1–5	76,549 (7.0)	15.4	20.8	28.9	12.9	43.3	12 (14.5)	22.3 (21.2)	56.4	34.1
No dispensing within 5 d	486,059 (44.6)	11.7	13.2	19.3	9.3	33.5	9.5 (12.3)	15.4 (18.1)	46.9	25.8
July 1, 2015-June 30, 2016 (N=	72,189,819 eligible	members ^c with	n 578,548 total <mark>d</mark> i	iagnoses ^d)						
Same day dispensing (day 0)	250,087 (43.2)	8.8	3.6	9.7	7.6	21.8	6.9 (8.3)	10.8 (12.2)	69.4	24.8
Dispensed days 1–5	35,762 (6.2)	16.3	19.3	26.1	16.2	27.9	11.5 (14.5)	19.6 (19.7)	57.7	38.0
No dispensing within 5 d	292,699 (50.6)	11.1	11.6	17.8	10.9	24.4	9.1 (12.2)	13.9 (17)	46.1	28.8
July 1, 2016–June 30, 2017 (N=	74,985,917 eligible	members ^c with	n 1,005,240 total	diagnoses ^d)						
Same day dispensing (day 0)	483,346 (48.1)	8.9	4.4	11.4	9.3	28.6	7.3 (8.5)	11.8 (13.5)	75.3	29.8
Dispensed days 1–5	74,307 (7.4)	16.0	22.7	30.0	17.2	38.7	12.3 (14.5)	21.8 (21.2)	58.6	48.1
No dispensing within 5 d	447,587 (44.5)	10.8	12.1	18.2	12.5	29.5	9.2 (12.1)	14 (17.7)	54.2	34.6

Note. COPD, chronic obstructive pulmonary disease; SD, standard deviation.

^aInfluenza testing assessed in days -7 through +7 relative to influenza diagnosis date.

^bPneumococcal vaccination assessed in all available claims data history per individual.

'Eligible members are those individuals who met all cohort entry criteria on at least 1 day during the query period.

^dIndividuals can contribute more than one diagnosis. The totals do not include people who were censored within 5 days of diagnosis and did not have an end point in that window.

Can We Adjust for Confounding?

- Objective: determine **whether there is evidence of residual confounding** in the association between influenza antiviral(s) and influenza complications in observational studies
 - Compare study results to estimates derived from randomized controlled clinical trials, with the goal of replicating the known association shown in clinical trials
 - Conduct analyses using a negative control period & negative control endpoint to evaluate analysis model

Enter COVID-19!

• Several key Sentinel initiatives completed before the pandemic laid the groundwork for COVID-19 activities

 $\circ\,$ Including expansion of inpatient EHR data from HCA Healthcare and TriNetX

- 3rd activity in the OCET work was a descriptive analysis similar to Activity 1, but set solely in the inpatient setting using electronic health record (EHR) data.
 Assess baseline characteristics, treatment, and endpoints among patients hospitalized with ILI
- In March 2020, FDA requested that COVID-19 cohorts be added to the activity.

Describing Patients and Treatments

Proportion of COVID-19 hospitalizations with administration of select medications, by week, February 20, 2020-January 10, 2021, HCA Healthcare Sentinel System data



Figure from Cocoros NM et al. Pharmacoepidemiology and Drug Safety. 2021;n/a(n/a). doi: 10.1002/pds.5240

Expanding "Near Real-Time" Data Sources





Thrombotic events in patients with outpatient COVID-19

Evaluation within the Sentinel System

COVID-19 Associated Coagulopathy

- Likely multi-factorial and potentially distinct from other commonly-seen consequences of critical illness, including DIC
- Linked with poor clinical outcomes



Open Questions

Clinical Research

- Do outpatients with COVID-19 have higher rates of thrombotic events than similar patients without COVID-19?
- Should outpatients with COVID-19 be monitored for pro-thrombotic laboratory values?
- Should outpatients with COVID-19 be treated with therapeutic dose anticoagulation?

Public Health Surveillance

- What are the rates of thrombotic events among outpatients with COVID-19?
- Are outpatients with COVID-19 being monitored for prothrombotic laboratory values?
- Are outpatients with COVID-19 being treated with therapeutic dose anticoagulation?

Studying Coagulopathy in Sentinel

- Sentinel developed a protocol to estimate the incidence of arterial and venous thrombotic events among patients with COVID-19 and compare risk of these events to patients with seasonal influenza using propensity score-based adjustment
 - Will also identify risk factors, particularly patient characteristics that promote stasis of circulation (e.g., obesity, atrial fibrillation), endothelial injury (e.g., diabetes, hypertension), and hypercoagulability (e.g., cancer, history of prior venous thromboembolism)

Ongoing Clinical Trial

- NIH-funded RCT investigating whether **anticoagulation** reduces life-threatening cardiovascular or pulmonary complications in newly diagnosed COVID-19 patients who do not require hospital admission
 - ACTIV-4: "A Multicenter Adaptive Randomized Double-Blind Placebo Controlled Platform Trial of the Efficacy and Safety of Antithrombotic Strategies in COVID-19 Adults not Requiring Hospitalization at Time of Diagnosis"



Outpatients with COVID-19 in Sentinel

• We describe **baseline characteristics** of outpatients with COVID-19 and further describe **occurrence of thrombotic events and death** among patients aged 40-79 years not hospitalized at the time of COVID-19 identification

• Simulate enrollment into ACTIV-4b clinical trial to inform sample size calculations

 \circ Will present findings NIH Panel to aid recruitment efforts

Data Source

- TriNetX is a "global health research network"
- USA Network includes electronic healthcare records (**EHR**) from 66 healthcare organizations (HCOs)
- Live R platform is a **cloud-based solution** allowing instant access to data and analytical tools



Data Intake and Harmonization

VARIOUS AND DISPARATE DATA

Procedures Diagnoses Demographics Lab Results Medications Vitals E. Genomics Cardiology Oncology Pulmonology Patient Mortality Location

Market Leading Data Appregators

MAPPED TO INDUSTRY STANDARD TERMINOLOGIES

MASTER TERMINOLOGY / INTELLIGENT SYNONYM SEARCH



MUST Have		CANNOT Have	
HbA1c	D E	Search Term	0 -
Code TNX:LAB:9037	Term Descripti Hemoglobin a1c	on /hemoglobin.total in blood	Patients 5,841,850
		ADD TO	QUERY
D Demographics	c Dia	gnoses L L	ab Results
Medications	Pro	cedures 0	Senomics

Special Considerations

- Refresh schedule
 - TriNetX allows HCOs to determine timing of data upload; no central resource for users to reference
 - \circ Query results may vary substantially if data updated between runs

- Relationship with HCOs
 - \circ Sentinel does not have access to HCOs
 - \odot Some data characterization and quality questions cannot be answered

INTRODUCTION

Capturing Patient Experience

Claims Data

- Comprehensive data across all encounters & settings
 Misses some clinical detail
- Primary care physician visit Outpatient dispensing Diagnosis Procedure Hospital visit Inpatient pharmacy Laboratory results Vital signs

Electronic Healthcare Data

- Detailed data within a single encounter
- Misses other encounters



Study Population: Inclusion

Criteria	ACTIV-4 outpatient trial	Presented analyses
Age	40-79 years	40-79 years
COVID-19 identification	Polymerase chain reaction (PCR)-positive symptomatic COVID infection	 COVID-19 ICD-10 diagnosis (B97.29, U07.1, B34.2, B97.2, J12.81) COVID-19-positive lab: PCR or antigen
Hospitalization	No hospitalization at time of diagnosis	No hospitalization [-2, 0 days] from COVID-19 record
COVID-19 identification care setting	Diagnosed in emergency department or other appropriate outpatient urgent care setting with on-site physician and blood draw capability	Not factored into these analyses
Pregnancy	Not pregnant or lactating	No evidence of pregnancy [-84, 0 days]
Inflammatory labs	 D-dimer > than the upper limit of normal (ULN) High-sensitivity C-reactive protein (hs-CRP) > 10mg/L 	 Included patients regardless of laboratory values Subgroup analysis restricted to individuals with d-dimer > ULN and hs-CRP or CRP > 10 mg/L

Study Population: Exclusion

Criteria	ACTIV-4 outpatient trial	Presented analyses
Anticoagulation	Indication for therapeutic anticoagulation or indication for single or dual antiplatelet therapy	Anticoagulant, antiplatelet or thrombolytic use [- 183, -2 days] from COVID-19 record
Concomitant medications	Concomitant need for p-gp or CYP3A4 strong inducers/inhibitors	Record of p-gp or CYP3A4 strong inducers/inhibitors [0, 45 days] from COVID-19 record
Bleeding risk	Bronchiectasis/pulmonary cavitation, gastroduodenal ulcer, recent major surgery, recent ischemic stroke, recent intracranial hemorrhage	Bronchiectasis, ischemic stroke, intracranial hemorrhage [-30, 0 days] from COVID-19 record
Cancer	Active cancer	Evidence of cancer [-30, 0 days] from COVID-19 record
Platelets	Platelet count < 100,000 per microliter	N/A
Kidney function	Calculated creatine clearance < 30 ml/min	N/A

Study Outcomes

- Composite of thrombotic events (DVT, PE, MI, ischemic stroke), ascertained in the "hospital" and in "any setting," and all-cause mortality at 45 days
 - Defined using ICD-10 algorithms validated in previous Sentinel analyses

 Safety outcome: Major bleeding (including gastrointestinal bleeding, hemoptysis, hemarthrosis, and intracranial hemorrhage) at 75 days using a modified/simplified case-definition¹

Subgroup Analyses

• CRP/hs-CRP

- \circ Elevated (> 10 mg/L)
- Normal (\leq 10 mg/L)

• D-dimer¹

- Elevated (> 500 ng/mL for FEU; > 250 ng/mL for DDU)
- Normal (≤ 500 mL for FEU; ≤ 250 mL for DDU)

D-dimer & CRP/hs-CRP

 Elevated d-dimer (>500 ng/mL [FEU] or >250 ng/mL [DDU]) and elevated CRP/hs-CRP (>10mg/L)



CRP: C-reactive protein; DVT: deep vein thrombosis; IH: intracerebral hemorrhage; IS: ischemic stroke; MI: myocardial infarction; PCR: polymerase chain reaction; PE: pulmonary embolism

Attrition

			Patients		HCOs	
	Network		92,513,780		64	
	Base Population		262,900	(-100%)	61	
	Population 40 - 79 years, Any sex		135,240	(-49%)	60	
~	Event 1A: Hospitalization [-2,0] The terms in this event occurred between Feb 20, 2020 and Sep 11, 2020 Must Have: 94308-4 Sars coronavirus 2 n gene [presence] in unspecified		106,910	(-20%)	60	
~	Event 3A: Blood thinners [-183,-2] The terms in this event occurred between Feb 20, 2020 and Sep 11, 2020 Must Have: 94307-6 Sars coronavirus 2 n gene [presence] in unspecified		93,500	(-13%)	60	
~	Event 2A: Comorbidities [-30,0] The terms in this event occurred between Feb 20, 2020 and Sep 11, 2020 Must Have: 94308-4 Sars coronavirus 2 n gene [presence] in unspecified		90,620	(-3%)	59	
~	Event 4A: Enzyme inhibitors/enhancers [0 The terms in this event occurred between Feb 20, 2020 and Sep 11, 2020 Must Have: 94307-6 Sars coronavirus 2 n gene [presence] in	•••	89,920	(-1%)	59	
~	Event 5A: Pregnancy [-84,0] The terms in this event occurred between Feb 20, 2020 and Sep 11, 2020 Must Have: 94307-6 Sars coronavirus 2 n gene [presence] in unspecified		89,640	(0%)	59	
			89,640 Patients		59 HCOs	

Baseline Demographics

Base Cohort: Adults (aged 40-79) not hospitalized at the time of their COVID-19 diagnosis



Selected Baseline Characteristics

	Base Cohort (non-hospitalized COVID-19 a			
	diagnosis)			
	n	%		
Total Patients	89,640			
Method of COVID-19 Diagnosis (not mutually exclusive)				
PCR	43,290	48.3%		
Antigen Test	90	0.1%		
ICD-10 code	54,210	60.5%		
Medications initiated on the same day or the day after index date [0, 1 days] ^{Y}				
Any blood thinner	3,310	3.7%		
Anticoagulants*	2,780	3.1%		
Heparin (excluding heparin flushes)	570	0.6%		
LMWH (enoxaparin, dalteparin)	2,140	2.4%		
Anti-platelets	1,270	1.4%		
Thrombolytics	10	0.0%		
Inflammatory/coagulation lab results on the same day or after index date [0, 7 days]				
CRP/hs-CRP				
Elevated (>10 mg/L)	3,120	3.5%		
Normal ($\leq 10 \text{ mg/L}$)	1,370	1.5%		
Not measured	85,150	95.0%		
D-dimer				
Elevated (> 500 ng/mL for FEU; > 250 ng/mL for DDU)	770	0.9%		
Normal (\leq 500ng/mL for FEU; \leq 250ng/mL for DDU)	2,420	2.7%		
Unknown [§]	1,070	1.2%		
Not measured	85,380	95.2%		
D-dimer and CRP/hs-CRP elevated	590	0.7%		

¥ Some of these medications may have been initiated in the inpatient setting and/or following a thrombotic event diagnosed within 1 days post-COVID diagnosis;

* Dabigatran, rivaroxaban, warfarin, desirudin, defibrotide, apixaban, argatroban, edoxaban, betrixaban, lepirudin, fondaparinux, heparin, bivalrudin, enoxaparin, dalteparin, tirofiban, and eptifibatide; § There is evidence that there was a lab obtained but no result provided

Outcomes

Total patients	N=89,640	
Outcomes	n	%
Hospitalized*	2,440	2.7%
Hospitalized DVT or PE	60	0.1%
Hospitalized MI or ischemic stroke	60	0.1%
Hospitalized and death (in-hospital death)	100	0.1%
All-cause death (any setting)	420	0.5%
Hospitalized DVT, PE, MI, or ischemic stroke*	110	0.1%
Hospitalized DVT, PE, MI, ischemic stroke or death*	520	0.6%
Hospitalized or non-hospitalized (any setting) DVT, PE, MI, ischemic stroke, or death*	890	1.0%
Hospitalized major bleeding*	130	0.1%

* Outcomes presented in subsequent slides All values are rounded up to the highest 10 to protect patient privacy

Outcomes stratified by d-dimer

	5.0% of patients with normal d-dimer and 7.8% of patients with elevated d- dimer had DVT, PE, MI, ischemic stroke, or death in any setting		D-dimer							
			≤ ULN		> ULN		Unknown			
Total patients			n=2420	100.0%	n=770	100.0%	n=1070	100.0%		
Outcomes										
Hospitalized			350	14.5%	120	15.6%	90	8.4%		
Hospitalized DVT, PE, MI, or ischemic stroke		20	0.8%	10	1.3%	10	0.9%			
Hospitalized DVT, PE, MI, ischemic stroke or death			90	3.7%	20	2.6%	90	8.4%		
Any setting DVT, PE, MI, ischemic stroke, or death		120	5.0%	60	7.8%	90	8.4%			
Hospitalized major bleeding		20	0.8%	10	1.3%	10	0.9%			

D-dimer values resulted [0, 7] days from COVID-19 identification All values are rounded up to the highest 10 to protect patient privacy

Outcomes stratified by CRP/hs-CRP

	2.9% of patients with normal CRP	CRP/hs-CRP			ients with normal CRP			
	and 6.7% with an elevated CRP had DVT, PE, MI, ischemic stroke, or death in any setting	≤ 10r	ng/L	> 10n	ng/L			
Total patients		n=1370	100.0%	n=3120	100.0%			
Outcomes								
Hospitalized		190	13.9%	380	12.2%			
Hospitalized DVT, PE, MI, or iso	chemic stroke	10	0.7%	10	0.3%			
Hospitalized DVT, PE, MI, ische	emic stroke or death	30	2.2%	140	4.5%			
Any setting DVT, PE, MI, ischen	nic stroke, or death	40	2.9%	210	6.7%			
Hospitalized major bleeding		10	0.7%	20	0.6%			

Outcomes stratified by d-dimer and CRP/hs-CRP

Trial inclusion criteria

1.7%

10

D-dimer > ULN

Total patients	and CRP/hs- CRP > 10mg/L			
			100.0%	
Outcomes				
Hospitalized		100	16.9%	
Hospitalized DVT, PE,	, MI, or ischemic stroke	10	1.7%	
Hospitalized DVT, PE,	, MI, ischemic stroke or death	20	3.4%	
Any setting DVT, PE, I	MI, ischemic stroke, or death	40	6.8%	

Conclusions, Part 1

- >95% of patients had no data available for D-dimer or CRP/hs-CRP
 - *Among those who had data,* ~70% had elevated CRP/hs-CRP
 - *Among those who had data,* ~18% had elevated d-dimer
 - *Among those who had data,* ~25% had a d-dimer value without units
 - We identified ~0.7% of COVID-19 patients with both elevated d-dimer and CRP/hs-CRP levels
- Approximately 3.7% of patients had record of an anticoagulant, antiplatelet, or thrombolytic medication on [0, 1 days] after COVID-19 identification

Conclusions, Part 2

- Among COVID-19 patients with both elevated D-dimer and CRP/hs-CRP levels:
 - **3.4%** developed DVT, PE, MI, ischemic stroke or death in the **inpatient setting**
 - **6.8%** developed DVT, PE, MI, ischemic stroke or death in **any care setting**
- Comparable to the 4-12% estimation used to inform sample size calculations in the ACTIV-4 outpatient clinical trial
 - The trial will include additional arterial thromboembolic events and nonthrombotic pulmonary events
- Also similar to published estimates of ~3-5% for VTE and 2.8% in arterial thrombotic events in a non-ICU setting^{1, 2}

Limitations, Part 1

- Unable to capture events occurring outside of the HCOs providing data \rightarrow underestimation?
- Sample was relatively young and more female \rightarrow affects counts and limits generalizability
- Tested asymptomatic patients may have been included in this analysis \rightarrow underestimation?
- Arterial thromboembolic events (other than MI and stroke) and hospitalization for non-thrombotic pulmonary events (i.e. hypoxemia, hypoxemic respiratory failure, ARDS) were not evaluated in this analysis
- Date-stamps for data within a single healthcare encounter not visible in application, limiting the ability to assess temporality of events
- Confounding by indication?
 - Patients at higher risk for thrombotic events (esp. those with elevated D-dimer and/or CRP/hs-CRP) may have been treated with anticoagulant therapy shortly after COVID-diagnosis

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