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Examining the Role of Patient Preferences to Inform Regulatory Decisions

Third Plenary Session

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THIRD PLENARY: Examining the Role of Patient Preferences to Inform Regulatory Decisions

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FDA U.S. FOOD & DRUG ADMINISTRATION

The Role of Patient Preferences to Inform Regulatory Decisions

Jeff Shuren, MD, JD
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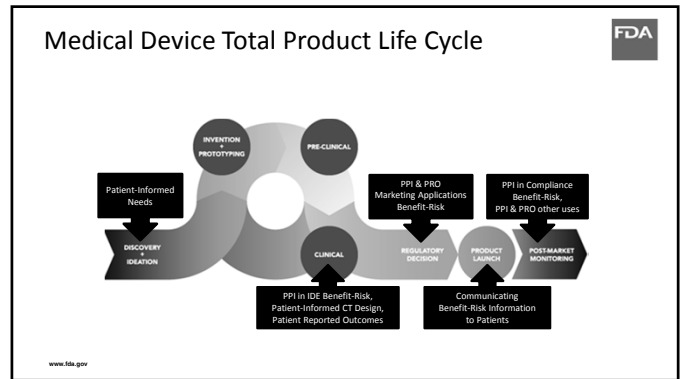
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Patients are at the Heart of What We Do




CDRH Vision: Patients in the U.S. have access to high-quality, safe, and effective medical devices of public health importance first in the world

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Device Benefit-Risk Frameworks



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Medical Device Benefit-Risk Guidance

Factors to Consider for Benefit – Risk Determinations Medical Device Premarket Approval and De Novo Classifications


Patient perspective on risk and perspective on benefit:

"If risks are identifiable and definable, risk tolerance will vary among patients, and this will affect individual patient decisions as to whether the risks are acceptable in exchange for a probable benefit. ... FDA recognizes that patient perspectives on benefits and risks may reveal reasonable patients who are willing to tolerate a very high level of risk to achieve a probable benefit, especially if that benefit results in an improvement in quality of life."

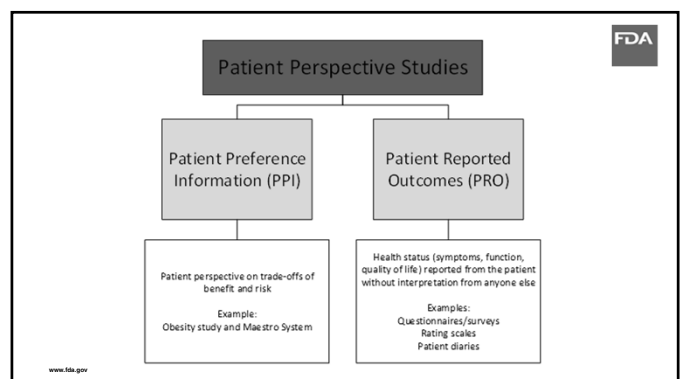
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Patient Perspectives

- Information relating to patients' experiences with a disease or condition and its management
- May be useful for:
 - better understanding the disease or condition and its impact on patients
 - identifying outcomes most important to patients
 - understanding benefit-risk tradeoffs for treatment




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What is Patient Preference Information?

FDA

- Patient Preference Information (PPI) is defined as:
 - qualitative or quantitative assessments of the relative desirability or acceptability to patients of specified alternatives or choices among outcomes or other attributes that differ among alternative health interventions**
- Relevant preferences of care-partners (e.g., parents) and health care professionals may also be considered




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Patient Preference Information (PPI)

FDA

- Qualitative PPI may be used to:
 - identify which outcomes, endpoints or other attributes are valued most by patients
 - understand which factors affect patients' perspectives on risk and benefit
- Quantitative PPI may be used to:
 - provide estimates of how much different outcomes, endpoints or other attributes are valued by patients
 - understand tradeoffs that patients state or demonstrate they are willing to make



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Complementary Efforts

FDA

Benefit-Risk Integrated Assessment


Benefit-Risk Dimensions		
Dimension	Evidence and Uncertainties	Conclusions and Reasons
CDER PFDD Focus	Analysis of Condition Current Treatment Options	Provides the therapeutic context for weighing benefits and risks
CDRH PPI Focus	Benefit Risk and Risk Management	Incorporates expert judgements about the evidence of efficacy and safety, and efforts to further understand or mitigate risk

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PPI in Medical Product Development

FDA




Development	Clinical Trial Design	Pre-Market Benefit-Risk Assessment	Post-Market
1. Identify unmet medical need 2. Understand what matters most to patients about their disease or treatment	1. Inform endpoint selection 2. Inform performance goal 3. Inform effect size	1. Analysis of condition 2. Current treatment options 3. Patient perspective on benefit-risk tradeoffs 4. Population subgroup considerations	1. Inform interpretation of new data affecting benefit-risk assessment 2. Inform studies of new/expanded use populations 3. Communicate benefit-risk information to patients



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Medical Device Patient Preference Initiative

FDA

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Patient Preference Guidance

FDA


Patient Preference Information – Voluntary Submission, Review in PMAs, HDE Applications, and De Novo Requests and Inclusion in Decision Summaries and Device Labeling

Objectives


1. To encourage submission of PPI, if available, by sponsors or other stakeholders to FDA and to aid in FDA decision-making
2. To outline recommended qualities of patient preference studies, which may result in valid scientific evidence
3. To provide recommendations for collecting and submitting PPI to FDA
4. To discuss FDA's inclusion of PPI in its decision summaries and provide recommendations for the inclusion of such information in device labeling

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PPI as Valid Scientific Evidence




- FDA may consider submitted PPI along with other evidence from clinical and nonclinical testing when making benefit-risk determinations
- This guidance does not change any review standards for safety or effectiveness
- It provides recommendations relating to the voluntary collection of PPI that may be submitted for consideration as valid scientific evidence as part of FDA's benefit-risk assessment



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PPI Submission to FDA is Voluntary



- PPI may not be relevant or appropriate for all device types
- May be useful for sponsors to collect and submit such information where usage decisions by patients and health care professionals are preference-sensitive
- Devices that could benefit from PPI include those with the following characteristics:
 - A direct patient interface
 - Intended to yield significant health and appearance benefits
 - Intended to directly affect health-related quality of life
 - Certain life-saving but high-risk devices
 - Developed to fill an unmet medical need or treat a rare disease or condition
 - Offer alternative benefits to those already marketed
 - A novel technology


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Recommended Qualities of Patient Preference Studies



Well-designed and conducted patient preference studies can provide valid scientific evidence regarding patients' risk tolerance and perspective on benefit. This may inform FDA's evaluation of a device's benefit-risk profile during the PMA, HDE application, and *de novo* request review processes.

- All about Patients
 - Patient Centeredness
 - Sample Representativeness
 - Capturing Heterogeneous Patient Preferences
 - Comprehension by Study Participants
- Good Study Design
 - Established Good Research Practices
 - Effective Benefit-Risk Communication
 - Minimal Cognitive Bias
 - Relevance
- Good Study Conduct and Analysis
 - Study Conduct
 - Logical Soundness
 - Robustness of Analysis of Results



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Regulatory Impact



FDA News Release
FDA approves first-of-kind device to treat obesity

Aug 28, 2017
Previous Release

For Immediate Release
January 14, 2015

Release

The U.S. Food and Drug Administration today approved the Maestro Rechargeable System for certain obese adults, the first weight loss treatment device that targets the nerve pathway between the brain and the stomach that controls feelings of hunger and fullness.

The Maestro Rechargeable System, the first FDA-approved obesity device since 2007, is approved to treat patients aged 18 and older who have not been able to lose weight with a weight loss program, and who have a body mass index of 30 to 45 with at least one other obesity-related condition, such as type 2 diabetes.

BMI, which measures body fat based on an individual's weight and height, is used to


NxStage Medical Announces FDA Clearance for Solo Home Hemodialysis Using NxStage® System One™

First clearance of its kind gives trained NxStage patients freedom to dialyze without a care partner

LAWRENCE, Mass., Aug. 28, 2017 /PRNewswire/ -- NxStage Medical, Inc. (Nasdaq: NXTM), a leading medical technology company focused on advancing renal care, today announced that the U.S. Food and Drug Administration (FDA) has cleared its System One for solo home hemodialysis, without a care partner, during waking hours.

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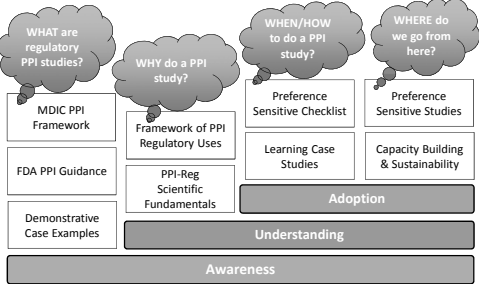
Lessons Learned from PPI Reviews



- Consult FDA early in designing PPI studies for a regulatory context
- Ensure PPI benefit and risk attributes match to outcomes of interest in clinical studies
- Pre-test instrument to ensure patient comprehension of benefit, harm, and uncertainty
- Develop a plan for recruiting patients
 - Ensure there is heterogeneity and generalizability of the study sample
 - Take into account recruiting for underserved populations
- Pre-specify analysis plan and potential subgroups

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Dec. 2017 CERSI-FDA Workshop: Advancing Use of PPI as Scientific Evidence for Medical Product Evaluation


The diagram illustrates a process flow for PPI studies. At the top, four key questions are posed: 'WHAT are regulatory PPI studies?', 'WHY do a PPI study?', 'WHEN/HOW to do a PPI study?', and 'WHERE do we go from here?'. Below these, a series of boxes represent frameworks and tools: MDIC PPI Framework, FDA PPI Guidance, Demonstrative Case Examples, Framework of PPI Regulatory Uses, PPI-Reg Scientific Fundamentals, Preference Sensitive Checklist, Learning Case Studies, Preference Sensitive Studies, and Capacity Building & Sustainability. These elements lead to 'Understanding' and finally 'Adoption'.

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Advancing the Science FDA




- Understand which methods are fit-for-purpose for the following types of questions:
 - Regulatory benefit-risk tradeoffs
 - Endpoint identification and/or prioritization
 - Identifying outcomes to guide patient-reported outcomes development
 - Informing clinical trial size
- Develop and refine approaches for:
 - Cognitive bias minimization
 - Effective communication of benefit-risk information to patients
 - Qualitative research best practices
 - Evaluation of study and data quality




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Advancing the Science (Continued) FDA




- Need to build capacity
 - Develop and establish training programs
 - Research resources and tools
 - Establish the value proposition for various regulatory uses
- Should include:
 - Sharing findings publicly
 - Establishing good work and good data collection tools for others to use or build on
 - Contributing to establishing standards regarding study quality and validity



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Final Considerations FDA

- FDA is invested in including the patient perspective in regulatory decision making
- ISPOR and other professional organizations can help advance the science of patient input by addressing existing scientific questions about robust and reliable preference studies, through:
 - Building capacity for conducting and assessing PPI studies
 - Methodology research to overcome current barriers to conducting and incorporating PPI studies to inform regulatory decision-making
- We are all working to do more research to strengthen the approaches for greater quality, trust, cost efficiency, and respect for patients' views and time



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Thank You




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Examining the Role of Patient Preferences to Inform Regulatory Decisions



My views on stated preference methods via a tour of my music collection

Matt Reaney, Global Head of Clinical Outcomes
May 23 2018



Disclaimer





The views expressed in this presentation are my own and do not necessarily reflect those of Sanofi


"You can't always get what you want; but if you try sometimes you might just find you get what you need"

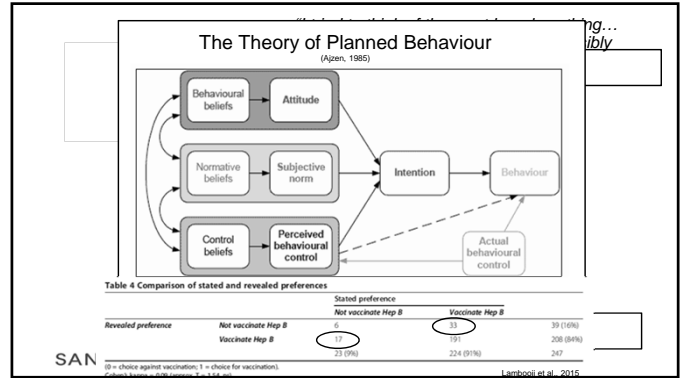
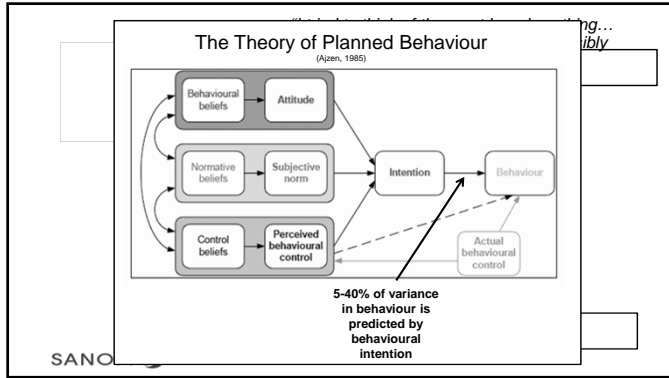
- Patient Preference Information (PPI) can be extremely relevant
 - Identifying what is important, desirable or valuable to patients can be important for sponsors
 - TPP
 - Trial design
 - Particularly relevant where benefit-risk trade-off is not clear, or where a novel route/mode/frequency of administration is under consideration
- Also very relevant in a choice-based healthcare system

My issues with stated preference methods to allow regulatory judgement about benefit-risk of a drug, device or biologic

"I tried to think of the most harmless thing... Something that could never, ever possibly destroy us"





"I tried to think of the most harmless thing... Something that could never, ever possibly destroy us"

- However, there is a conflict between stated preferences and "patient experience"
 - attitudes vs expectations vs intentions vs actual behaviour
 - In hypothetical (decontextualized) situations:
 - People use decision-making heuristics to "project"
 - Diminished role of normative beliefs
 - Emotion not accounted for

"How infinite is space and who decides your fate; Why everything will dissolve into sand... Why nothing ever turns out as you plan; These are things that I don't understand"

- Reliability and validity of stated preference data questionable
 - Validity:
 - Assume health literacy/numeracy
 - Comprehensiveness
 - Cognitive overload / information bias
 - Order effects / interdependencies
 - Reliability:
 - Internal consistency questionable
 - Cognitive reframing
 - Desirable responding
 - Subjective norm
 - Generalisability

5.6 A Patient has been diagnosed with Lung cancer (non-small-cell lung cancer). His doctor asks him to decide between treatment A and treatment B. Which treatment would you choose?

Characteristic	Treatment A	Treatment B
Time without tumor progression	Medium 11 months on progression 2 years overall survival	Medium 11 months on progression 2 years overall survival
Side effect of skin	Moderate	None
Nausea and vomiting	Mild	Severe
Diarrhea	Moderate	Moderate
Tiredness/fatigue	Mild	Severe
Tumor related symptoms	Severe	Mild
Mode of Administration	Infusion	Tablet

Why ever on't

5.6 A Patient has to decide between

Characteristic	Treatment A	Treatment B
Device Size	Small	Large
Needle Size	Small	Large
Dosing Frequency	Once daily	Once daily
Preparation	<ul style="list-style-type: none"> Clean needle Take the medication out of the refrigerator Attach the needle Select the dose using dial Inject the medication Leave the needle in your arm for 30 seconds to ensure a full dose has been given 	<ul style="list-style-type: none"> Whisper and let it warm up to room temperature Align the needle provided with the medication Combine the powder and liquid by tapping the vial Tap up to 20 times on the palm of your hand to mix Inject the medication Leave the needle in your arm for 30 seconds to ensure a full dose has been given
Improvement in AEs	1.2 point improvement	1.2 point improvement
Time to next dose	1.2 point improvement	1.2 point improvement
Side effects	<ul style="list-style-type: none"> 10% chance of injection site reactions 10% chance of dizziness 10% chance of nausea 10% chance of injection site reactions 	<ul style="list-style-type: none"> 10% chance of injection site reactions 10% chance of dizziness 10% chance of nausea 10% chance of injection site reactions

"How infinite is space and who decides your fate; Why everything will dissolve into sand...Why nothing ever turns out as you plan; These are things that I don't understand"

The Self-Regulation Model

(Leventhal, 2003)

```

    graph LR
      A[Attitudes/Beliefs] --> B[Intention Goals Plans]
      E[Emotions] --> B
      S[Social Support and Pressure] --> B
      B --> C[Behaviour]
      C --> D[Outcomes Subjective and Objective]
      D --> E[Evaluation]
      E --> A
      E --> B
  
```

"I would like to dive for pearls, but the water's way too deep"

- What stated preference methods cannot do:
 - Tell us about patient experience
 - Tell us about satisfaction/ acceptability
 - Replace other research
 - Inform us about decision making under "real life" circumstances
 - Maximum acceptable risk?
 - Minimum acceptable benefit?
 - Provide a global comparison (embedding effect)
 - Tell us why things are important

If all oral diabetes medicines work the same and have the same side effects, which of the following dosing schedules would you choose? (Please select only one.)

pearls, but the water's way too deep"

s cannot do:

Overall	Weekly dosing (87%)	Daily dosing (13%)
On treatment	Weekly dosing (85%)	Daily dosing (15%)
Not on treatment	Weekly dosing (75%)	Daily dosing (25%)
Age Group		
18-44 years old	Weekly dosing (77%)	Daily dosing (23%)
45-64 years old	Weekly dosing (58%)	Daily dosing (42%)
65 or older	Weekly dosing (48%)	Daily dosing (52%)
Time Since Diagnosis		
Diagnosed <3 years ago	Weekly dosing (66%)	Daily dosing (34%)
Diagnosed >3 years ago	Weekly dosing (87%)	Daily dosing (13%)

Hauber et al., 2015

"There's still time to change the road you're on"

- Regulatory use of stated PPI:
 - Very relevant information for deciding on relevant benefit-risk
 - What matters to people
 - How much things matter
 - What trade-offs people think they may be willing to make
 - Consider relevant attributes relevant to patients
 - e.g. frequency of administration


"There's still time to change the road you're on"

14.4 Patient Experience

Previously untreated adult patients outside of the United States with CD20+ diffuse large B-cell lymphoma (DLBCL) or CD20+ follicular non-Hodgkin's lymphoma (FL) Grades 1, 2, or 3a were randomized to receive a standard chemotherapy regimen (CHOP, CVP, or bendamustine) and either RITUXAN HYCELA 1,400mg/23,400 Units at Cycles 2-4 (after the first cycle with intravenous rituximab) or a rituximab product by intravenous infusion at Cycles 1-4. After the fourth cycle, patients were crossed over to the alternative route of administration for the remaining 4 cycles. After Cycle 8, 477 of 620 patients (77%) reported preferring subcutaneous administration of RITUXAN HYCELA over intravenous rituximab and the most common reason was that administration required less time in the clinic. After Cycle 8, 66 of 620 patients (11%) preferred rituximab intravenous administration and the most common reason was that it felt more comfortable during administration. Forty eight of 620 patients (7.7%) had no preference for the route of administration. Twenty nine subjects of 620 (4.7%) received Cycle 8 but did not complete the preference questionnaire.


"There's still time to change the road you're on"

- Regulatory use of stated preference methods:
 - Label should include patient experience data.
 - Experience-based preference evaluation could be included in labelling
 - equal exposure to two treatments is required
 - or at least experience in previous lines
 - Proxies for preference
 - Satisfaction
 - Patient-perceived benefit-risk
 - Patient preference information in routine clinical practice a cornerstone of EBM



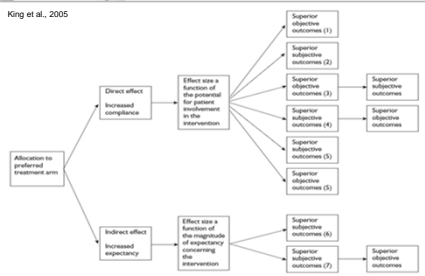
"It keeps holding on; And it's holding strong; Even though I tried to break it; Heaven knows that I can't shake it"

- If strong preferences are observed, this may undermine the credibility of the RCT if comparison is preference-sensitive
- **Recruitment**
- **Retention**
- **Behaviour modification**
 - Trial outcomes = function of treatment +/-
 - Motivation
 - Adherence
 - Expectations




"It keeps holding on; And it's holding strong; Even though I tried to break it; Heaven knows that I can't shake it"

King et al., 2005




s may +/-



"You loosed the chains ... But I still haven't found; What I'm looking for"


- Patient Preference Information (PPI) to be used:
 - **Sponsor:**
 - Identifying outcomes of interest
 - Determining commeriability
 - Trial design
 - **Decision-makers**
 - Regulators; to inform B-R decision-making
 - Payers; reimbursement for choice
 - Prescribers; individual-PPI
- **BUT**..... focus on:

● Patient experiences	Not stated
● Valuation of outcomes	preference
● Individualised trade-offs	methods



"I get by with a little help from my friends"

- Denise Bury
- Stephen Joel Coons
- Daniel Eek
- Sonya Eremenco
- Adam Gater
- Heather Gelhorn
- Chad Gwaltney
- Lori McLeod
- Charlie Nicholls
- Jean Paty
- Anna Ryden



"Lean on me when you're not strong and I'll be your friend; I'll help you carry on"

- Regulatory considerations of PROs: which would enhance stated PPI:
 - Content validity
 - Context of Use
 - Test-retest (internal validity)
 - Interpretable (meaningful) responses
 - Interdependencies
 - Comprehensiveness
 - Cognitive reframing
 - Cognitive overload
 - Desirable responding
 - Subjective norm
 - Generalisability
 - Missing data




"Stop right now; Thank you very much"

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My views on stated preference methods via a tour of my music collection

Matt Reaney, Global Head of Clinical Outcomes
May 23 2018



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Considerations for Patient Preference Studies to Inform Regulatory Decisions

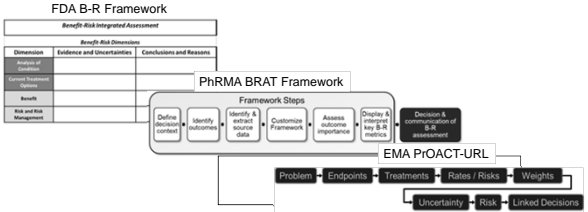
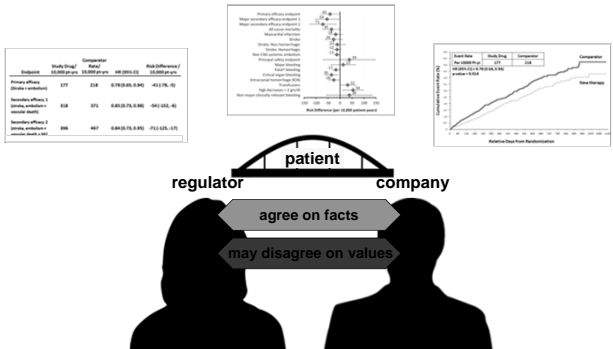
ISPOR 2018 Meeting
May 23, 2018

Bennett Levitan, MD-PhD

Senior Director, Benefit-Risk Assessment
Department of Epidemiology
Janssen Research & Development, LLC

Structured Benefit-Risk: B-R Frameworks

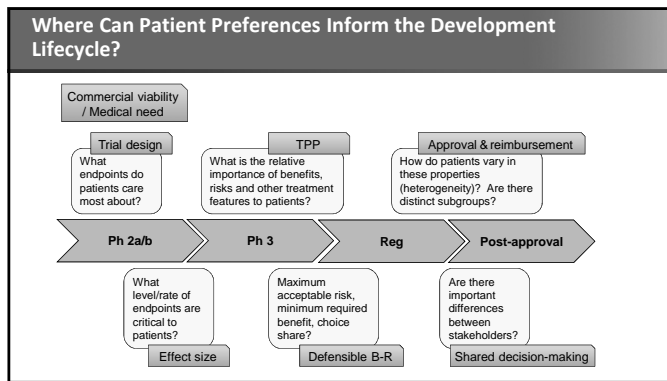
- Set of principles, guidelines and tools for selecting, summarizing and communicating evidence for B-R decisions
- Preference can inform many elements common to all frameworks

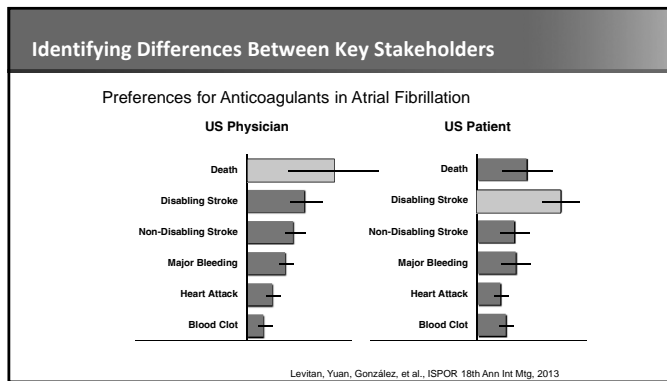
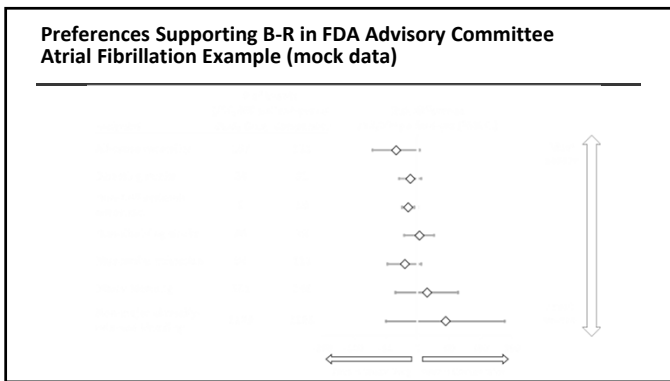
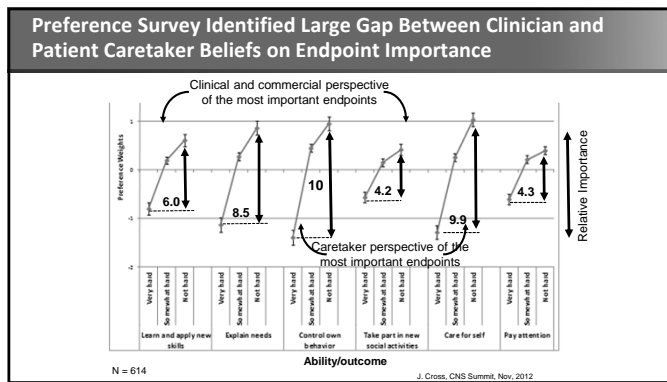
Three Types of Patient Preference Information

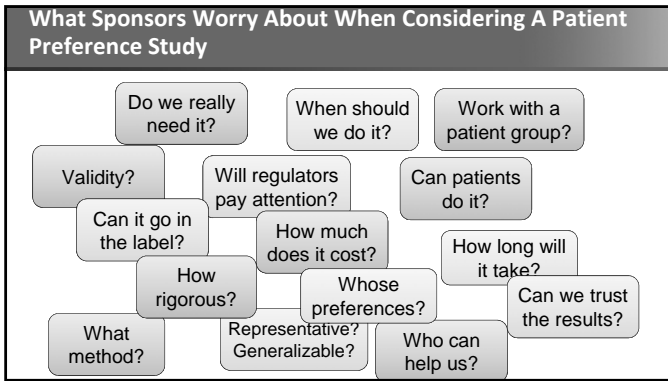
Type	What it Measures
Attributes	What Matters
Relative Importance	How much it matters
Tradeoffs	What tradeoffs patients are willing to make between benefits, harms, and other aspects

Adapted from RTI-HS and MDIC



- ### Which endpoints do patients care about? Example: Fragile-X Syndrome
- Rare genetic condition impacting development**
 - Learning and intellectual disabilities, cognitive impairment, behavioral challenges (ADHD, autism, social anxiety)
 - No cure – educational, therapeutic support
 - Preference study conducted to prepare for phase 3 study**
 - Intent was to identify which endpoints or components of existing instruments were most important to patients
 - Survey administered to family members, given patient cognitive limitations





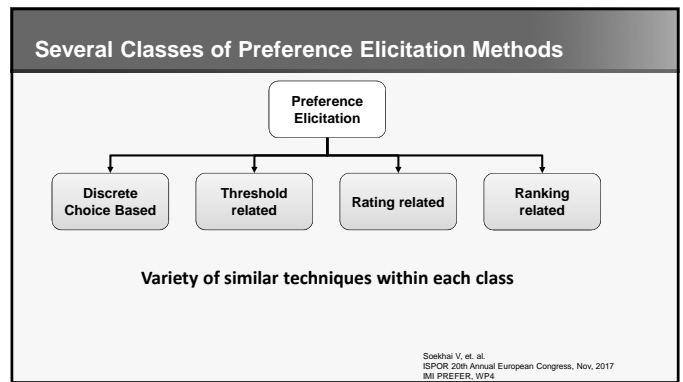
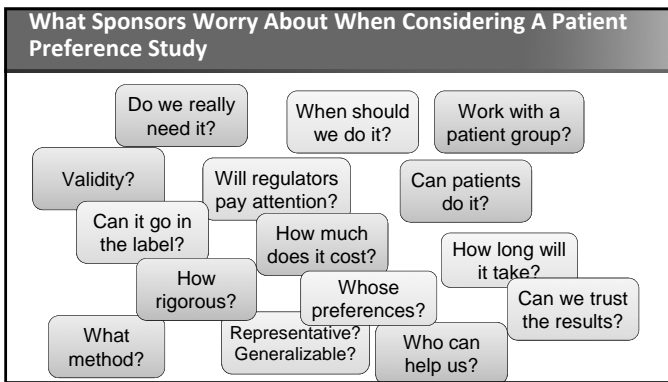
Patient Experience Section included in Rituxan Hycela Label (Approved 2017)

RITUXAN HYCELATM (rituximab and hyaluronidase human) injection, for subcutaneous use
Initial U.S. Approval: 2017

14 CLINICAL STUDIES
14.1 Follicular Lymphoma
14.2 Diffuse Large B-Cell Lymphoma (DLBCL)
14.3 ~~Chronic Lymphocytic Leukemia (CLL)~~
14.4 Patient Experience

14.4 Patient Experience
Previously untreated adult patients outside of the United States with CD20+ diffuse large B-cell lymphoma (DLBCL) or CD20+ follicular non-Hodgkin's lymphoma (FL) Grades 1, 2, or 3a were randomized to receive a standard chemotherapy regimen (CHOP, CVP, or bendamustine) and either RITUXAN HYCELA 1,400mg/23,400 Units at Cycles 2-4 (after the first cycle with intravenous rituximab) or a rituximab product by intravenous infusion at Cycles 1-4. After the fourth cycle, patients were crossed over to the alternative route of administration for the remaining 4 cycles. After Cycle 8, 477 of 620 patients (77%) reported preferring subcutaneous administration of RITUXAN HYCELA over intravenous rituximab and the most common reason was that administration required less time in the clinic. After Cycle 8, 66 of 620 patients (11%) preferred intravenous administration and the most common reason was that it felt more comfortable during administration. Forty eight of 620 patients (7.7%) had no preference for the route of administration. Twenty nine subjects of 620 (4.7%) received Cycle 8 but did not complete the preference questionnaire.

https://www.accessdata.fda.gov/drugsatfda_docs/label/2017/761044s0009.pdf



Growth of Regulatory Expectations, Guidance and Initiatives in Patient Engagement, B-R, and Patient Preferences

Regulatory/Govt 	Trade/Acad Orgs 	Pub Private/Prof 	Patient Groups
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Incomplete list

Approaches to Address These Concerns – selected examples

Survey Development

- Use good research practices guidelines
- Focus on the research question (keep it simple)
- Qualitative interviews / studies before (bottom-up approach)
- FDA's open approach – early discussions and protocol review
- Consortia approach
- Fund larger, more representative samples

Focus the Preference Survey on the Research Question

Factors influencing whether patient preference information may be valuable for regulatory review

Patients as stakeholders	<ul style="list-style-type: none"> Patients' benefit-risk preferences different than providers or regulators Patient subgroups with different preferences would make different decisions Importance of personal familiarity with the disease (e.g. very subjective endpoints, lifestyle indication, rare disease)
Benefit-risk trade-offs (preference sensitive)	<ul style="list-style-type: none"> Benefit-risk balance is not obvious (e.g. clear benefit with rare serious risks) Time separation of benefits and harms Considerable uncertainty about benefits and harms
Regulatory novelty	<ul style="list-style-type: none"> Lack of regulatory precedent for population or indication New technologies in existing area or existing technology in a new area

Medical Device Innovation Consortium Patient-centered Benefit-risk Framework
http://mdic.org/wp-content/uploads/2015/05/MDIC_Framework_Web.pdf

Two approaches to developing patient preference studies

Product-evaluation (top-down) approach

- Disease and preference experts define features and priorities
- Often applies to existing products / services or those in development
- Survey pretest similar to cognitive debriefing
- Example: CDRH weight-loss preference study (Ho et al., 2015)
- Typically faster and less expensive

Can be used for well-understood disease context and endpoints

Issues-identification (bottom-up) approach

- Patients define relevant features, priorities and need in qualitative interviews
- Not necessarily specific to the features of an existing product
- Survey development similar to concept elicitation
- Example: PPMD Duchenne Muscular Dystrophy Studies (Hollin et al., 2015; Peay et al., 2014)
- Typically takes more time and funds

Needed to understand relevant attributes and meaningful changes

Approaches to Address These Concerns – selected examples

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Survey Testing

- Pretesting
- Comprehension tests
- Internal validity tests
- Pilot survey

Potential Internal Validity Tests

- Repeat questions
- Elapsed time
- Dominated pair (mostly DCE)
- Straight-lining or patterning (e.g. all column A)
- Domination (always deciding based on a single attribute)
- Monotonicity tests
- Transitivity tests
- Scope tests (check for recoding of levels)
- Face validity
- Internal consistency (variance) of a subject's utilities

} Tradeoff between sample size, cognitive burden and tests

} None are definitive, but can be very informative collectively

Approaches to Address These Concerns – selected examples

Survey Development

- Use good research practices guidelines
- Focus on the research question (keep it simple)
- Qualitative interviews / studies before (bottom-up approach)
- FDA's open approach – early discussions and protocol review
- Consortia approach
- Fund larger, more representative samples

Survey Testing

- Pretesting
- Comprehension tests
- Internal validity tests
- Pilot survey

Repetition

- Repeat survey in a new sample
- Used different sample sources
- Conduct survey with more than one method

Multiple Methods BWS vs. DCE, Type 2 diabetes treatments

Results: Mixlogit (rho = 0.89)

BWS = best-worst scaling
DCE = discrete choice experiment
Janssen, Sepal and Bridges. The Patient, vol 9, issue 5, 2016

Sample Source – Can be very important to use more than one – ex: panels vs. RCTs

On-line Panel	Randomized Clinical Trial
Advantages <ul style="list-style-type: none"> Many options readily available in many countries Generally inexpensive Can perform probabilistic sampling to match basic criteria 	Advantages <ul style="list-style-type: none"> Trusted diagnoses and history Associated clinical data Longitudinal sampling Health authority focus on work Revealed choice by dropouts
Concerns <ul style="list-style-type: none"> Self-report Can be challenging to meet some inclusion/exclusion criteria Limited associated clinical data Selection bias – those who join on-line panels 	Concerns <ul style="list-style-type: none"> Many regulatory and legal requirements Huge management overhead ePRO vendor limitations Huge increase in cost Differs from real-world patients Selection bias – those who choose to enter RCTs

Approaches to Address These Concerns – selected examples

Survey Development	Survey Testing	Post-Survey
<ul style="list-style-type: none"> Use good research practices guidelines Focus on the research question (keep it simple) Qualitative interviews / studies before (bottom-up approach) FDA's open approach – early discussions and protocol review Consortia approach Fund larger, more representative samples 	<ul style="list-style-type: none"> Pretesting Comprehension tests Internal validity tests Pilot survey 	<ul style="list-style-type: none"> Terminal questions (easy to understand, answers consistent with my preferences, relevance of vignette and attributes, etc.) Compare to other patient experience data Subject interviews ("why") Sanity tests ("Do the results make sense")
	Repetition <ul style="list-style-type: none"> Repeat survey in a new sample Used different sample sources Conduct survey with more than one method 	

A Goal for Preference Studies

Product	Study Design	Sample Size	Study Type	Study Length	Study Cost	Risk Difference
Primary efficacy	117	218	0.162(0.01, 0.30)	100(0.00, 100)	100(0.00, 100)	0.02(0.00, 0.04)
Secondary efficacy	118	219	0.162(0.01, 0.30)	100(0.00, 100)	100(0.00, 100)	0.02(0.00, 0.04)
Secondary efficacy	119	220	0.162(0.01, 0.30)	100(0.00, 100)	100(0.00, 100)	0.02(0.00, 0.04)
Secondary efficacy	120	221	0.162(0.01, 0.30)	100(0.00, 100)	100(0.00, 100)	0.02(0.00, 0.04)

agree on facts

Understand values

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THIRD PLENARY: Examining the Role of Patient Preferences to Inform Regulatory Decisions

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