



CLINICAL DATA INTERCHANGE STANDARDS CONSORTIUM

*The CDISC vision is to inform patient care & safety  
through higher quality medical research.*

A decorative graphic consisting of several overlapping, wavy lines in shades of blue and green that transition into a horizontal bar with a diagonal hatched pattern.

**Strength** *through Collaboration*

# The CDISC Moonshot - Can we do it?

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**FH | JOANNEUM**  
University of Applied Sciences

**XML**  
**4Pharma**

*Strength through Collaboration*

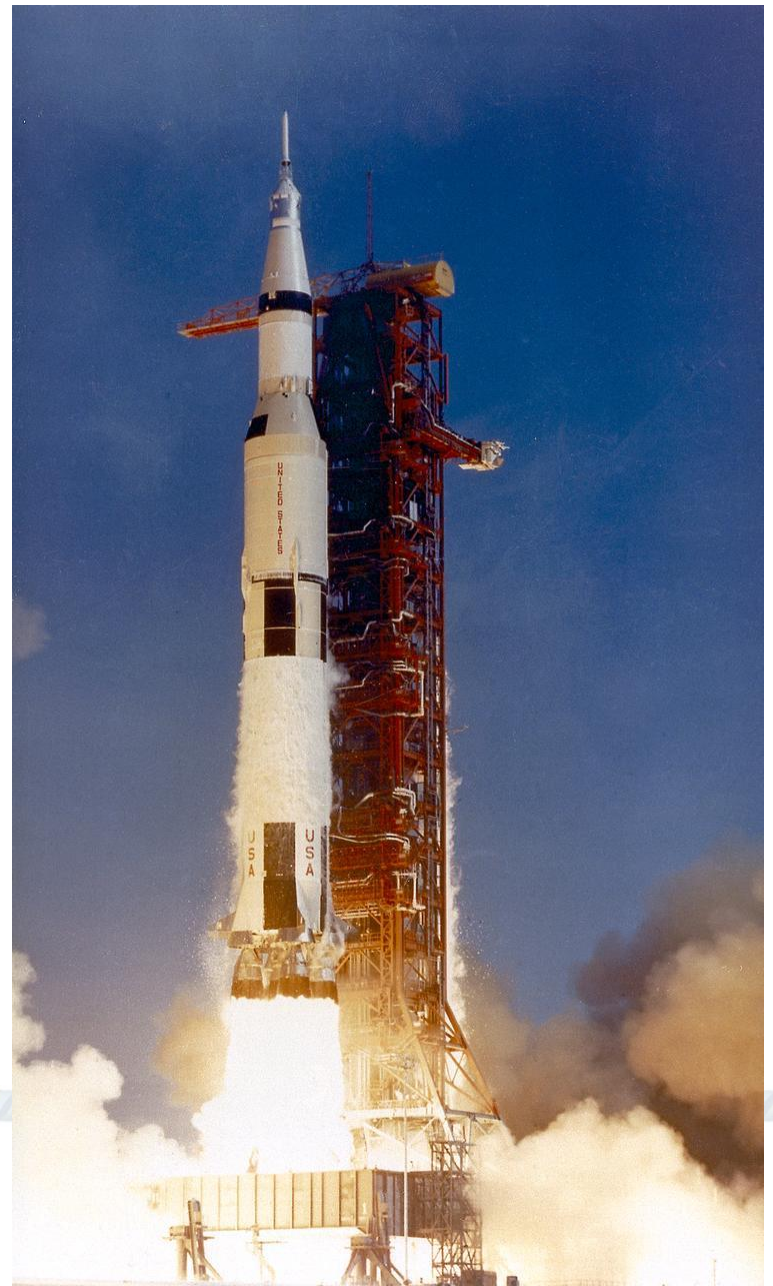
# CDISC has grown ...



But it is time to  
take the next step ...

# The CDISC Moonshot

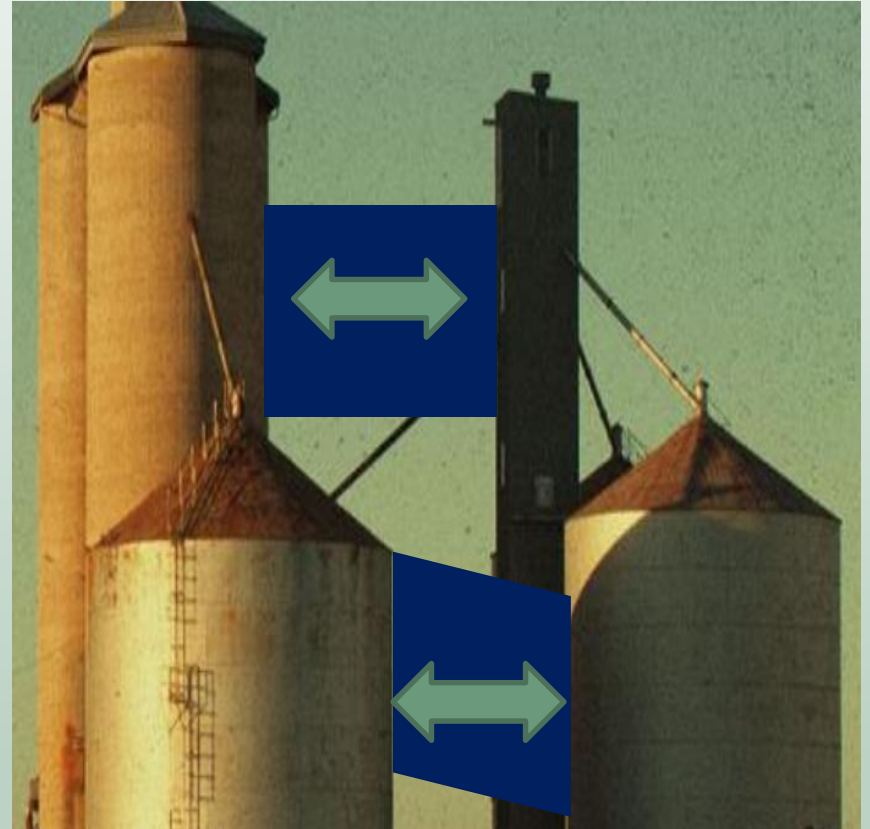
The next great step ...



# From the CDISC website ...

Are these stages  
of a CDISC  
rocket?

Oh no ... these are  
CDISC silos ...





# From silos to rocket stages

- Most of our standards have their origin in the last century ...
- Are not according to "current state of the art" in (bio)medical informatics
- Have developed along the same lines and traditions we had almost 20 years ago
- Don't we need a modernization?



# The CDISC ODM Standard

- 20 years old, only minor updates
  - And some extensions (Define-XML, SDM-XML, Dataset-XML, CTR-XML)
- No support for:
  - RESTful web services
  - Flexible and complicated study designs
  - Wearables, insideables
- Little support for electronic health records
- Based on the concept of "files"
  - Who still needs data files? We need "data services"

# ODM 2.0 - the first rocket stage

- Support for RESTful web services
  - The data can be **anyware** - not necessarily in files
- Full integration of electronic health records
- We need some concepts that are also used by FHIR
  - But clinical research is more complicated (protocol based)
- Downward compatible
- Can ODM and FHIR be **one standard** in 10 years from now?





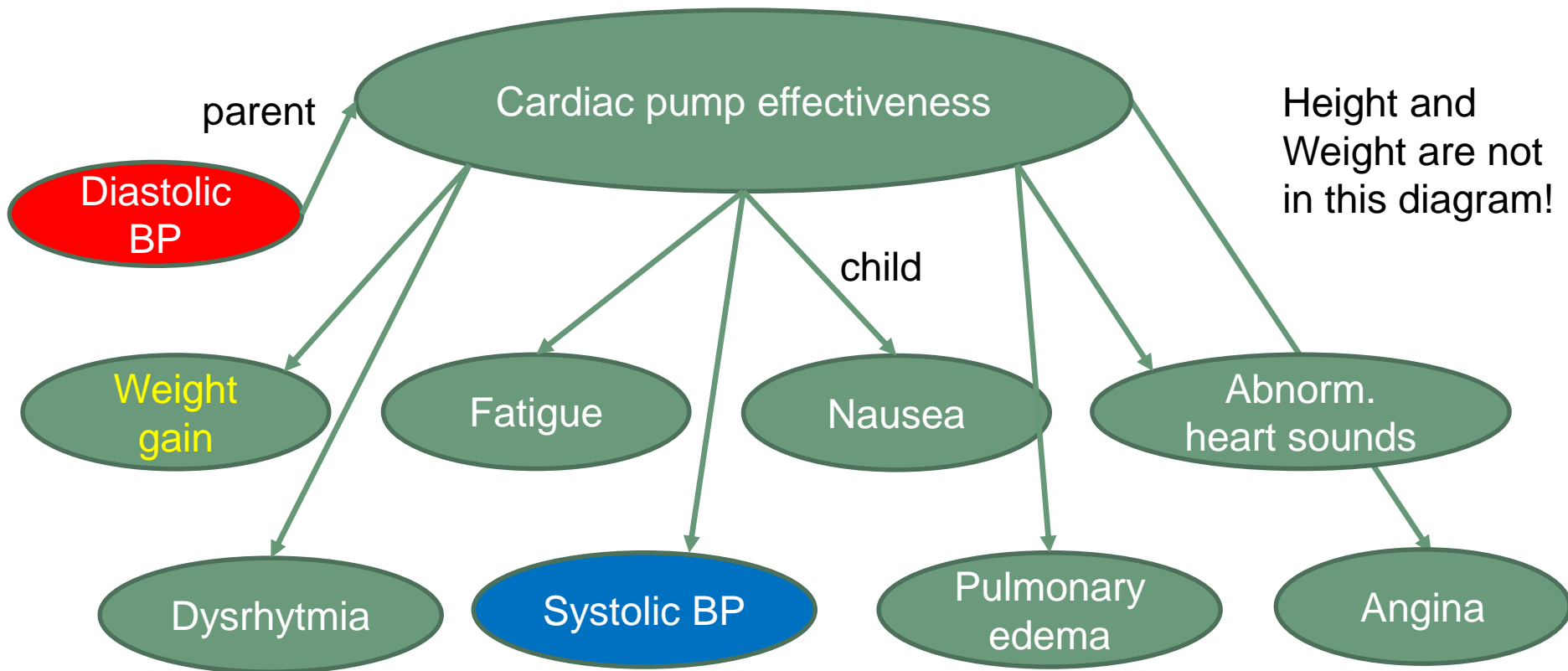
# CDISC controlled terminology

- "Lists" of terms with little or no links between them
- DIABP and SYSBP are as much related as DIABP with FRM IZB - really?
- Refusal to use controlled terminology from the medical world
  - LOINC
  - UCUM
  - ICDx
  - SNOMED
  - ...

NOT  
INVENTED  
HERE

# An example using UMLS RESTful web services

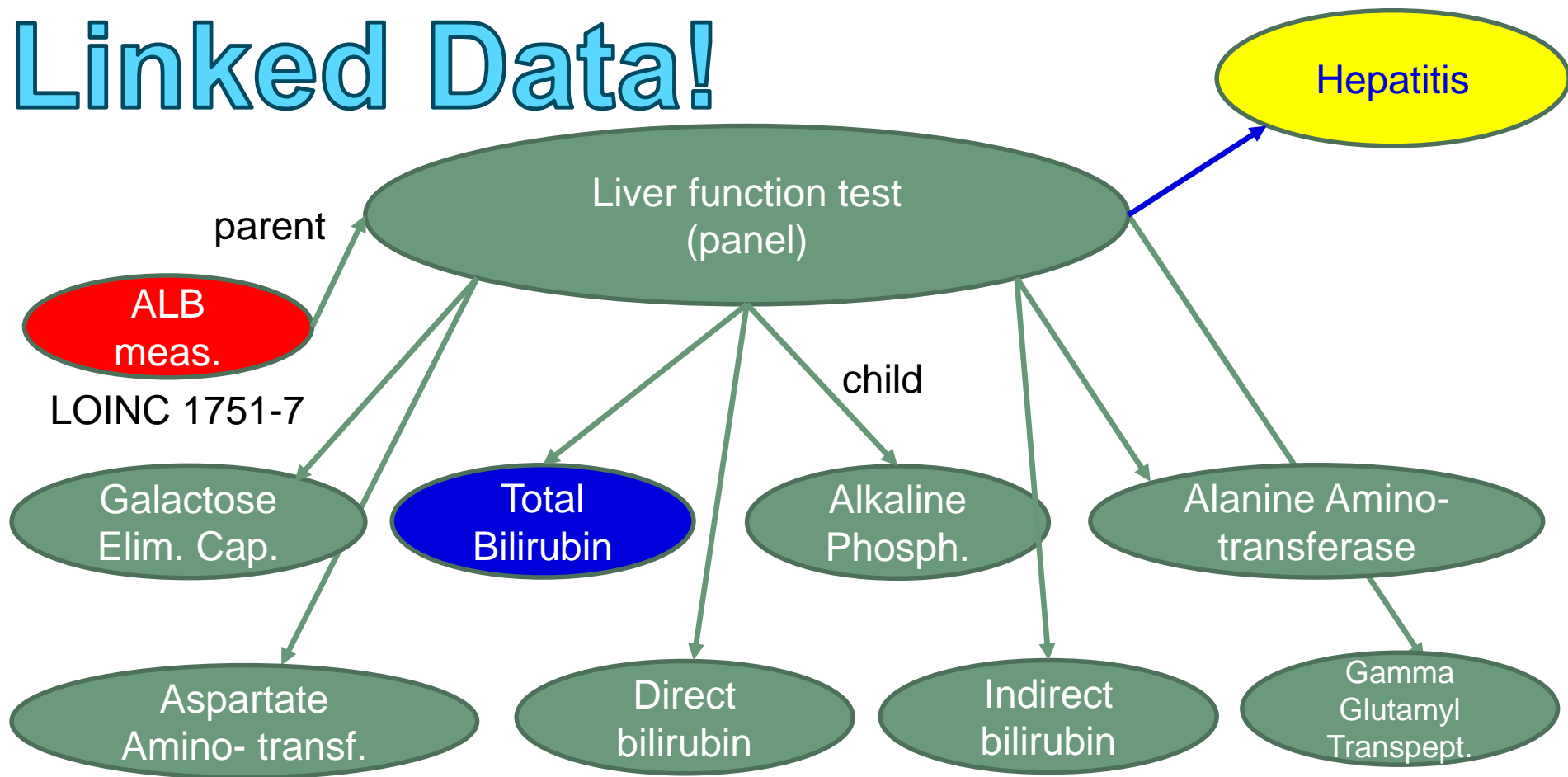
## Linked Data!



"DIABP" and "SYSBP" are related through e.g. "*cardiac pump effectiveness*"  
There is no way ever to find out using CDISC-CT alone...

# A LOINC example using UMLS RESTful web services

## Linked Data!



"ALB" and "BILI" are related through e.g. "Liver function test"  
There is no way ever to find out using CDISC-CT alone...

# Units

- How much cm is 1 inch?

Answer: 

- Does CDISC-CT know?

[http://www.xml4pharmaserver.com:8080/CDISCCTService/rest/ucumtransform/\[in\\_i\]/to/cm](http://www.xml4pharmaserver.com:8080/CDISCCTService/rest/ucumtransform/[in_i]/to/cm)

## UCUM Transformation Web Services

```
- <XML4PharmaServerWebServiceResponse ServerDateTime="2017-02-08T16:13:28">
  - <WebServiceRequest>
    http://www.xml4pharmaserver.com:8080/CDISCCTService/rest/ucumtransform/1/from/%5Bin_i%5D/to/cm
  </WebServiceRequest>
  - <Response>
    <SourceQuantity>1.0</SourceQuantity>
    <SourceUnit>[in_i]</SourceUnit>
    <TargetUnit>cm</TargetUnit>
    <ResultQuantity>2.54</ResultQuantity>
  </Response>
</XML4PharmaServerWebServiceResponse>
```

# Units

- How much is 1 "international unit" pro mg "supercompound" pro g pro kg of "chicken" pro hour in: "international unit" pro ounce "supercompound" pro g pro pound of "chicken" per day ?

```
- <XML4PharmaServerWebServiceResponse ServerDateTime="2017-02-08T16:22:02">
  - <WebServiceRequest>
    http://www.xml4pharmaserver.com:8080/CDISCCTService/rest/ucumtransform/1/from/%5BiU%
    %5D%7Bchicken%7D/d)
  </WebServiceRequest>
  - <Response>
    <SourceQuantity>1.0</SourceQuantity>
    <SourceUnit>[iU]/mg{supercompound}/(g/kg{chicken}/h)</SourceUnit>
  - <TargetUnit>
    m[iU]/[oz_av]{supercompound}/(g/[lb_av]{chicken}/d)
  </TargetUnit>
  <ResultQuantity>2604166.7</ResultQuantity>
</Response>
</XML4PharmaServerWebServiceResponse>
```

Forget about doing this  
when using CDISC "units"

# CDISC Controlled Terminology

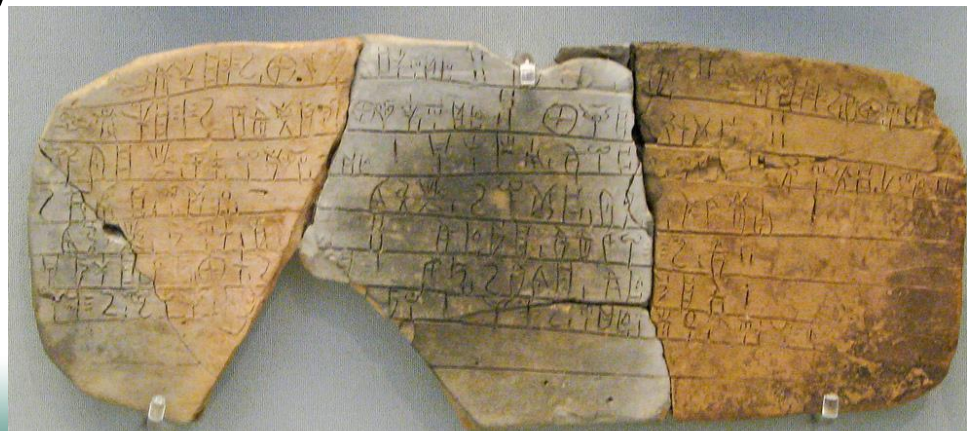
- CT is our "rocket fuel"
- And we can't afford not to get the highest quality fuel
- If there is better fuel than "our own invented one", we need to use that
- Some of our "fuel" is OK, but the most important part isn't





# SDTM / SEND / ADaM

- Two dimensional tables
- Breaking almost any rule of "good database design"
- **Massive** amount of **data redundancy**
  - 30-40% of the variables could be removed
- Very limited amount of traceability (only through define.xml)
- Pretty bad (outdated) data model



# Smart tools can replace **data redundancy**

DOMAIN	USUBJID	SUBJID	RFSTDTC	RFENDTC
DM	01-701-1015	1015	2014-01-02	2014-07-02
DM	01-701-1023	1023	2012-08-05	2012-09-0a
DM	01-701-1028	1028	2013-07-19	2014-01-14
DM	01-701-1033	1033	2014-03-18	2014-04-14
DM	01-701-1034	1034	2014-07-01	2014-12-30
DM	01-701-1033 (USUBJID)			
DM	01-701-1033		First date of study treatment exposure = Tue Mar 18 2014	
DM	01-701-1033		Last date of study treatment exposure = Mon Mar 31 2014	
DM	01-701-1111	1111	2012-09-07	2012-09-17

COUNTRY	DMDTC
USA	2013-12-26
USA	2012-07-22
USA	2013-07-11
USA	2014-03-10
USA	2013-07-11 (DMDTC)
USA	DMDY = -8

VS				
USUBJID	VSSEQ	VSTESTCD	VSPOS	VSO
01-701-1015	7	DIABP	SUPINE	56
01-701-1015	8	DIABP	STANDING	51
01-701-1015	9	DIABP	STANDING	61
01-701-1015	10	DIABP	DIABP (VSTESTCD)	
01-701-1015	11	DIABP	Diastolic Blood Pressure	
01-701-1015	12	DIABP	NCI: C25299	

VISITNUM	VSDTC	VSTPT
6	2014-02-01	AFTER LYING
6	2014-02-01	AFTER STAN
6	2014-02-01	AFTER STAN
7	6 (VISITNUM)	
7	Visit: AMBUL ECG REMOVAL	
7	Planned Study Day of Visit: 30	

VISITNUM	LBDTC
9	2014-03-26T15:15
10	2014-05-07T11:21
11	2014-05-21T10:59
2014-05-07T11:21 (LBDTC)	
LBDY = 125	
Element = PBO (Placebo) - Epoch = Treatment	

Reviewers should start using these tools...

[Smart Dataset-XML Viewer](#)

# SDTM / SEND / ADaM

- Due to data redundancy and 2-D tables our submission standards have too much **weight** ...
- Like that, we will never reach the moon ...
- CDISC should never have given up **first principles** because of (silly) requests from reviewers who use completely outdated tools
- It is not too late to slim down SDTM/SEND/ADaM
- And we should start thinking about alternatives
  - Some people do, but their work is mostly ignored

# Is SDTM ready for the future?

- More and more trials with "wearables" and "insideables"
  - "CRF free"
- Remote clinical trials without any "visits"
  - But SDTM still requires us to submit **VISITNUM**
- Clinical trials with virtual sites
- Read Doug Bain's and Kai Langel's [blogs](#) (ClinPal)
- Shouldn't we rethink a good number of SDTM (outdated) assumptions?



# Better / smarter validation tools

- Current process:



External  
company



Validation  
Software

- Result:



# Better / smarter validation tools

**False  
positives**

But you can always  
describe the **false  
positives** in the  
Reviewer's Guide  
isn't it?

Real errors



# The "Open Rules for CDISC Standards" Initiative

FDA, PMDA, CDISC rules implemented as:

- Transparent rules
- Human-readable and machine-executable
- Use RESTful web services
  - In future also using the SHARE API
- Updates/corrections over a RESTful web service
  - No more "waiting for the next release"
- Anyone can develop his own validation system

# "Open Rules for CDISC Standards"

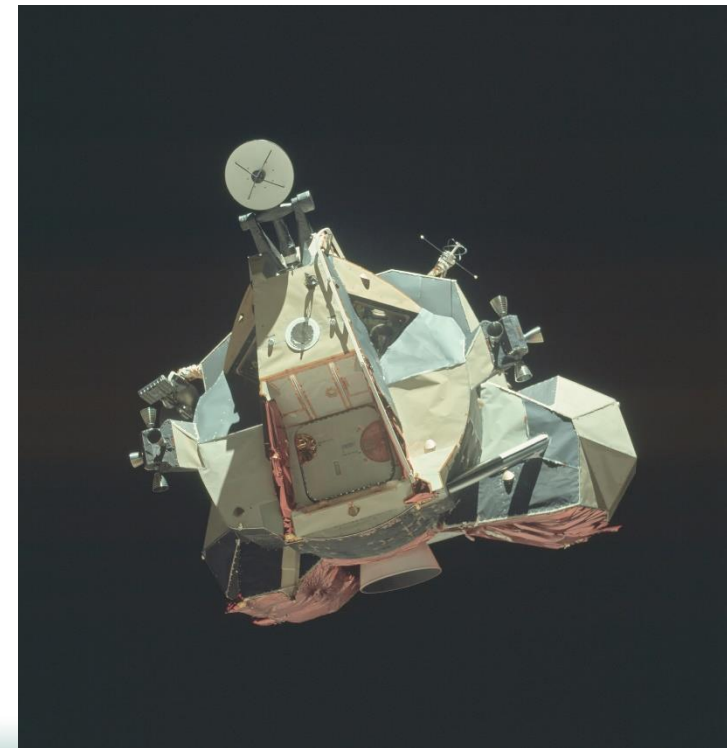
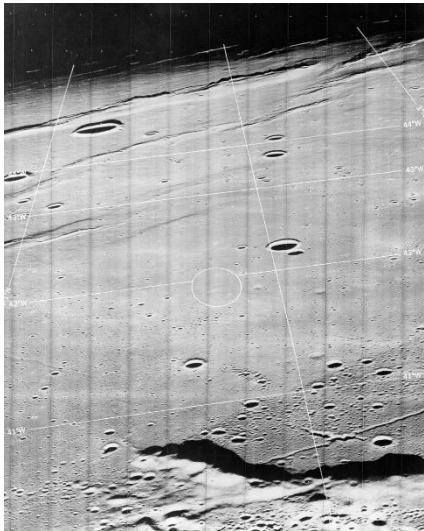
## Example - Rule FDAC017

```
1  (: Rule FDAC017-FDAC018: SDTM Required variable not found - Variables described in SDTM as Required
2  must be included in the dataset :)
3  (: The following Query relies on that the define.xml is complete and
4  that Mandatory='Yes' is set for each required variable :)
5  xquery version "3.0";
6  declare namespace def = "http://www.cdisc.org/ns/def/v2.0";
7  declare namespace odm="http://www.cdisc.org/ns/odm/v1.3";
8  declare namespace data="http://www.cdisc.org/ns/Dataset-XML/v1.0";
9  declare namespace xlink="http://www.w3.org/1999/xlink";
10 declare namespace request="http://exist-db.org/xquery/request";
11 (: "declare variable ... external" allows to pass $base and $define from an external programm :)
12 (: declare variable $base external; :)
13 (: declare variable $define external; :)
14 let $base := '/db/fda_submissions/cdisc01/'
15 let $define := 'define2-0-0-example-sdtm.xml'
16 (: iterate over all datasets mentioned in the define.xml :)
17 for $itemgroup in doc(concat($base,$define)//odm:ItemGroupDef
18   (: get all the ItemRef-OIDs which have 'Mandatory="Yes" :)
19   let $mandatory := $itemgroup/odm:ItemRef[@Mandatory='Yes']/@ItemOID
20   (: get the dataset itself :)
21   let $datasetfilename := $itemgroup/def:leaf/@xlink:href
22   let $dataset := doc(concat($base,$datasetfilename))
23   let $datasetname := $itemgroup/@Name
24   (: iterate over all the records :)
25   for $record in $dataset//odm:ItemGroupData
26     let $recnum := $record/@data:ItemGroupDataSeq
27     (: iterate over the 'mandatory' OIDs :)
28     for $m in $mandatory
29       (: and give an error when there is no such ItemData/@ItemOID :)
30       let $varname := doc(concat($base,$define)//odm:ItemDef[@OID=$m]/@Name
31       where not($record/odm:ItemData[@ItemOID=$m])
32       return <error rule="FDAC017" datasetname="{ $datasetname }" variable="{ data($varname) }"
33       rulelastupdate="2015-08-31" recordnumber="{ $recnum }">
34       No data found for required variable {data($varname)} in record number {data($recnum)}
35       in dataset {data($datasetname)}</error>
```

Already implemented  
in the "Smart  
Dataset-XML Viewer"

# The final stage: landing on the moon

- On average, our spacecraft is circling 6 months (the review time) around the moon before landing
- The crew is told they are free to use any tools they brought with them, even when they are completely outdated ...



# How can review be shortened

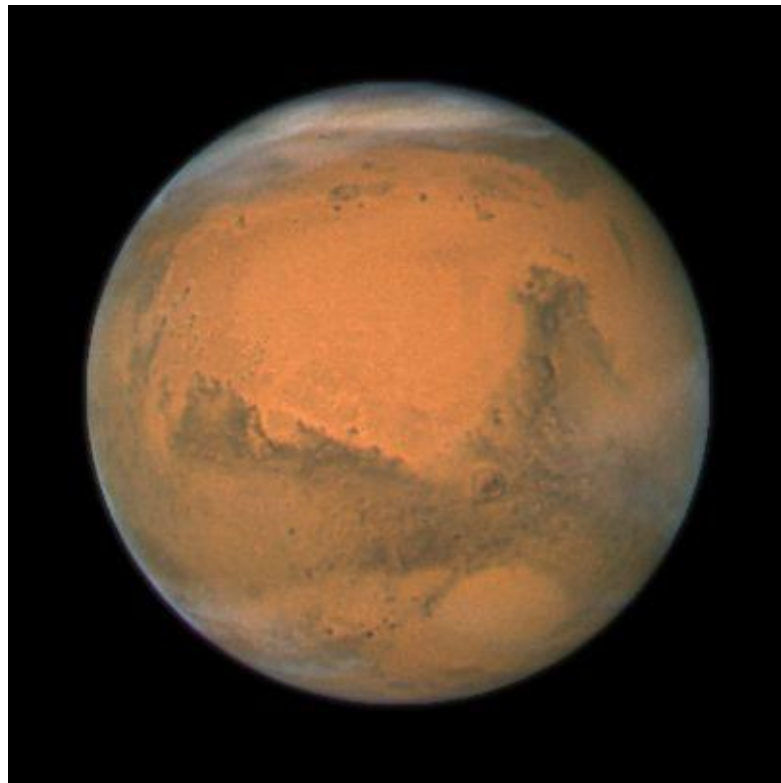
without any loss of quality - even with quality increase

- Reviewers should not be allowed to use **files** anymore
- All submissions in a single (set of) **database(s)**
  - E.g. native XML databases
  - The database is the **only** allowed source of information
- CDISC volunteers can provide modern tools (e.g. open-source) to regulators that reviewers must at least use

STUDYID	DOMAIN	USUBJID	LBSEQ	LBTESTCD	LBLOINC	LBCAT	LBORRES	LBORRESU	VISITNUM	LBORNRLC
CDISCPILLOT01	LB	01-701-1015	233	BASO						
CDISCPILLOT01	LB	01-701-1015	263	BASO						
CDISCPILLOT01	LB	01-701-1015	298	BASO						
CDISCPILLOT01	LB	01-701-1015	7	BILI						
CDISCPILLOT01	LB	01-701-1015	44	BILI						
CDISCPILLOT01	LB	01-701-1015 (USUBJID)	233	BASO	26444-0	HEMATOLOGY	0.03	THOU/uL	11	0
CDISCPILLOT01	LB	01-701-1015 ACTARMCD: Pbo	263	BASO	26444-0	HEMATOLOGY	0.04	THOU/uL	12	0
CDISCPILLOT01	LB	01-701-1015 AGE: 61 years	298	BASO	26444-0	HEMATOLOGY	0.03	THOU/uL	13	0
CDISCPILLOT01	LB	01-701-1015 SEX: Female	7	BILI	1975-2	CHEMISTRY	0.6	mg/dL	1	0.2
			44	BILI	1975-2	CHEMISTRY	0.5	mg/dL	4	0.2
			79	BILI	1975-2	1975-2 (LBLOINC)				
			109	BILI	1975-2	LOINC Common Name: Bilirubin.total [Mass/volume] in Serum or Plasma				
			139	BILI	1975-2	Example UCUM Units: mg/dL				

# Some are even reaching further ...

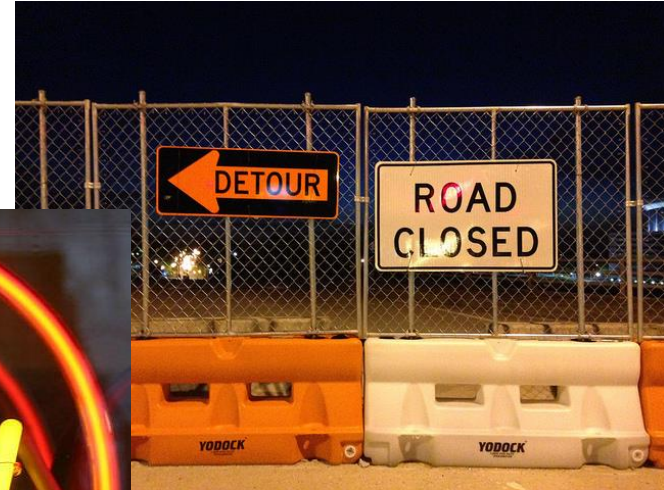
- Initiatives like:
  - RDF
  - Linked Data
  - SDTM-IG in XML
  - Protocol in XML
  - ...
- Mostly not official CDISC activities  
(but shouldn't they?)
- But regulators are still extremely reluctant to even think about these





# The Showstoppers ... Actions required

- Get rid of SAS-XPT
- Start mandating LOINC and UCUM
- Get rid of "not invented here" syndrome
- Help / convince / force regulatory authorities to use modern technologies





# Regulators and the "cancer moonshot"

- FDA is expected to receive US \$xx million from the "cancer moonshot" programm
- If they would invest a few % of that in modern technology (computers, non-relational databases, tools) they would make a huge step forward
- And the result could be:



# Acknowledgements

- All volunteers that fight
  - **FOR** getting things done better, simpler, more efficient
  - **AGAINST** "not invented here", "do it as we always have done" mentality



Photo credit: NASA/Kim Shiflett

# Further Acknowledgements

- Anthony, Dave (2x), Frederic, Geoff, Kerstin, Lauren, Lex, Niels, Peter, Marcelina, Sally, Sam, Vojtech, ...
- My eHealth students at the university of applied sciences FH Joanneum in Graz

Picture acknowledgements at:

[www.XML4Pharma.com/London\\_Interchange/acknowledgements.html](http://www.XML4Pharma.com/London_Interchange/acknowledgements.html)

# The next step ...?



**Thank you for  
your attention!**

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