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### Open Rules for CDISC. Web Services and the CDISC Library API

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### Agenda

- 1. What is wrong with current validation of submission data?
- 2. The alternative: "Open Rules for CDISC Standards"
- 3. Validation Rules and the CDISC Library API

#### Disclaimer:

The views and opinions expressed in this presentation are those of the Jozef Aerts and do not necessarily reflect the official policy or position of CDISC.

### What is wrong with current validation of submission data?

- When publishing Implementation Guides (SDTM / SEND / ADaM), CDISC did not publish corresponding validation rules in the past (or only *years after* the publication of the IG)
- Implementation Guides are (very) open for different interpretations
  - Published as PDF or HTML (not machine-readable)
  - Vague language e.g. "The following Qualifiers would not generally be used in XX ..."
- Other organizations have picked up this lack of clarity to develop validation rules and impose these as "the gold standard"
- These "rules" have been extended by / on behalf of FDA and PMDA, becoming the "FDA/PMDA Validation Rules"



### What is wrong with current validation of submission data?

#### Working to amplify data's impact

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CDISC creates clarity in clinical research by bringing together a global community of experts to develop and advance data standards of the highest quality. Together, we enable the accessibility, interoperability, and reusability of data for more meaningful and efficient research that has greater impact on global health.

- Clarity can only be obtained when CDISC defines the validation rules
- And makes them available in a machine-readable format
  - So that different interpretations become impossible (no "wiggle room")
  - Publishing them in Excel is just a first step, but not sufficient
- All new CDISC standards will publish validation rules



### Validation of Submission Data - Why we want to do better Current validation software ...

- Is not governed nor maintained by CDISC
- Is often an over-interpretation of the IGs
- Rule implementations are intransparent
- Some (FDA/PMDA) rules do not make sense (e.g. --ORRESU must be populated when --ORRES populated)
- Mostly ignores the define.xml (define.xml = "sponsor's truth")
- Uses manipulated (!) CDISC-CT files
- Generates a large number of false positives
- Has a lot of bugs
- Does not have a mechanism for fast bug fixes
  - Bug fixes will come in 2, 3, 4, ... years
- Bugs and false positives are to be reported in the SDRG
- The world upside down ...

30 seconds overview





### How can we bring more clarity in validation?

### **Open Rules for CDISC Standards**



### **Open Rules for CDISC Standards**

# Requirements

### Requirements for Open Rules for CDISC Standards

- Vendor neutral, freely available
- Machine-readable AND human-readable transparent
- Separation of rules and software
  - Rules can be read and executed from within any (modern) software
- Takes define.xml serious as "the sponsor's truth"
- Reference implementation available
- Transformable to different languages (R, SAS, Java, Python, ...)
- No false positives
- Timely and transparent updates when bugs reported
- Process for making updates and fixes automatically available
  - E.g. API and RESTful Web Service
- Versioning of rules
- Support for SDTM, SEND and ADaM
- Easily extensible by sponsors with company-internal rules

### Coming to a vendor-neutral, human- and machinereadable rule description

- Unfortunately, there does not seem to be a universal, open, machine-readable language for validation rules
- Candidates currently investigated:
- XQuery,
  - · Which is however limited to XML
  - But we DO have CDISC Dataset-XML for SDTM, SEND and ADaM!
  - International W3C standard
  - Easy-to-learn and could be transformed into R, SAS, Python ...
- VTL: Validation and Transformation Language
  - Seems to be pretty abstract, little experience available
- KNIME: Data mining software and language







### Example: a simple SDTM Rule (from CDISC) CG0027: The values of --CAT and --SCAT must be different

	А	В	С	D	E	F	G	Н	1	J
22	CG0026	ALL	ALL	RFTDTC	RFTDTC = null	TPTREF = null	Model v1.4	2.2.5	Table 2.2.5: RFTDTC	Date/time for a fixed reference time point defined byTPTREF
23	CG0027	ALL	ALL	SCAT	SCAT ^=CAT	SCAT ^= null	Model v1.4	2.2.1	Table 2.2.1: SCAT	Used to define a further categorization ofCAT values.
	CG0028	ALL	ALL	SEQ	SEQ is a unique number per USUBJID per domain, or a unique number per POOLID	Variable is not TS.TSSEQ	Model v1.4	2.2.4	Table 2.2.4: SEQ	Sequence number to ensure uniqueness of records within a dataset for a subject (or within

- Excel worksheet gives precondition, condition, rule
- Is pretty well human-readable
- But hardly machine-executable
  - · And can, in some cases, be interpreted differently by humans



## Open Rules for CDISC Standards Development and Implementation

### A simple rule in XQuery (shortened): CG0027: The values of --CAT and --SCAT must be different

(: iterate over all datasets that have a --CAT and --SCAT variable in the interventions, events findings domains and the TI dataset :)

```
for $dataset in
    doc(concat($base,$define))//odm:ItemGroupDef[upper-case(@def:Class)='INTERVENTIONS' or upper-case(@def:Class)='EVENTS' or upper-ca
    let $name := $dataset/@Name
    let $datasetname := $dataset/def:leaf/@xlink:href
    let $datasetlocation := concat($base,$datasetname)
    (: Get the OID of the --CAT variable (if any) :)
    let $catoid := (
        for $a in doc(concat($base,$define))//odm:ItemDef[ends-with(@Name,'CAT') and string-length(@Name)=5]/@OID
        where $a = doc(concat($base,$define))//odm:ItemGroupDef[@Name=$name]/odm:ItemRef/@ItemOID
        return $a
    )
    let $catname := concat($name,'CAT')
    (: Get the OID of the --SCAT variable (if any) :)
```

```
let $scatoid := (
```

```
for $a in doc(concat($base,$define))//odm:ItemDef[ends-with(@Name,'SCAT') and string-length(@Name)=6]/@OID
where $a = doc(concat($base,$define))//odm:ItemGroupDef[@Name=$name]/odm:ItemRef/@ItemOID
return $a
```

```
)
```

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```
let $scatname := concat($name, 'SCAT')
(: iterate over all records that DO have a CAT AND SCAT value :)
```

## Selects the datasets that have both --CAT as well as --SCAT as per the define.xml

### A simple rule in XQuery (shortened): CG0027: The values of --CAT and --SCAT must be different

(: iterate over all records that DO have a CAT AND SCAT value :)
<pre>for \$record in doc(\$datasetlocation)//odm:ItemGroupData[odm:ItemData[@ItemOID=\$catoid]</pre>
and odm:ItemData[@ItemOID=\$scatoid]]
<pre>let \$recnum := \$record/@data:ItemGroupDataSeq</pre>
(: and compare the values - they MUST NOT be equal :)
<pre>let \$catvalue := \$record/odm:ItemData[@ItemOID=\$catoid]/@Value</pre>
<pre>let \$scatvalue := \$record/odm:ItemData[@ItemOID=\$scatoid]/@Value</pre>
where \$catvalue = \$scatvalue
<pre>return <error <="" dataset="{\$name}" pre="" rule="CG0027" variable="{data(\$scatname)}"></error></pre>
<pre>rulelastupdate="2017-02-04" recordnumber="{data(\$recnum)}"&gt;Values for {data(\$catname)}</pre>
and {data(\$scatname)} are identical in dataset {data(\$datasetname)}

And iterates over all records in the selected datasets and compares the values of --CAT and --SCAT. Error messages come as XML (transformable to HTML, PDF, ... reports)

This code is very easy to read\_and understand, even for SAS programmers cdisc

#### Another simple rule in KNIME: CG0019: Each record is unique per sponsor defined key variables as documented in the define.xml





### Who will be able to implement these Open Rules?

- Everyone using modern computer languages
- Software is strictly separated from the rules themselves
  - But any modern software will be able to read and execute the rules
- Includes SAS, R, Java, Python, C#, ...
- Will usually only require a few lines of code



XQDataSource xqjd = new SaxonXQDataSource(new net.sf.saxon.Configuration()); XQConnection xqjc = xqjd.getConnection(); XQPreparedExpression exp = xqjc.prepareExpression(xqueryString); exp.bindObject(new QName("base"), base, null); XQResultSequence result = exp.executeQuery(); while (result.next()) { ... }

### What is a "Reference Implementation"?

- Well known in the software development world
- Is an implementation of an OPEN STANDARD that serves as an example implementation
- Usually the Reference Implementation is FULLY OPEN SOURCE
  - Including the right to copy, change code, redistribute source and executables
- Everyone is COMPLETELY FREE to develop other implementations
  - Including commercial implementations
  - Competition is based on execution speed, user-friendlyness, additional features
- BUT! The results *MUST* be the same as when using the reference implementation



## Generating other implementations from the Reference Implementation

transport formats





### **Current (testbed) Implementations**

• The open source "Smart Submission Dataset Viewer" already implements a good amount of such "candidate" "Open Rules" (including FDA, PMDA)

Smart Dataset-XML Vie	ewer		- D X					
and boase and here!			Validation Rule Selection X					
Standard:	SDTM 👻	?	CDISC SDTM FDA SDTM MyCompany SDTM PMDA SDTM					
Define xml		-	CG0006DY calculated as per the study day algorithm as a non-zero integer value	<b>^</b>				
<b>Doministration</b>			GG0006-SDDY calculated as per the study day algorithm as a non-zero integer value (single dataset)					
Define.xml version:	2.0		G0007DY variable may only be populated when RFSTDTC is a complete date and theDTC is at least a complete date					
			G0007-SDDY variable may only be populated when RFSTDTC is a complete date and theDTC is at least a complete date					
			CG0008ELTM must be null whenTPTREF = null					
			CDG0009 - EPOCH in TA.EPOCH					
Dataset XMI, data files:			CG0013 - Variable = Model List of Allowed Variables for Observation Class					
Dataset-Ame data mes.			G0014-SD - Required variables must always be included in the dataset and cannot be null for any record.					
			CG0017 - Split dataset names length > 2 and <= 4					
			□ CG0018 - Supplemental Qualifier datasets: Split dataset names length <= 8					
		-	🔲 🕲 CG0019 - Each record is unique per sponsor defined key variables as documented in the define.xml					
Use TYPED ItemData (	ItemDataString, ItemDataDate	5	🔲 🕃 CG0019-SD - Each record is unique per sponsor defined key variables as documented in the define.xml (single dataset or domain)					
Bring SUPPQUAL data	a back to original dataset		G0020 - Each coded Value must be in the associated codelist (if any) or have the value 'MULTIPLE'					
0%		c	CG0020-SD - Each coded Value must be in the associated codelist (if any) or have the value 'MULTIPLE'					
Progress:	0% %		G0021 - Each coded Value must be in the associated codelist (if any) or have the value 'OTHER'					
Perform CDISC Rules XQuery validation on datasets     Create and show CDISC Rules XQuery validation rep     Validation Rules Selections			CG0021-SD - Each coded Value must be in the associated codelist (if any) or have the value 'OTHER'					
			CDG0022 - If a domain/dataset has anLNKGRP variable, at least one other domain/dataset must have aLNKGRP variable					
				•				
			Search: From Top Next Previous					
Start Interrupt			Display selected rules implementation					

https://sourceforge.net/projects/smart-submission-dataset-viewe/



### Open Rules and RESTful web services

- Some of the "candidate" "open rules" do use (query) RESTful webservices
  - From NLM (e.g. validity of LOINC codes), NIH (e.g. RxCUI/RxNorm) and CDISC-CT
  - Avoids needing to update files constantly (such as CT files)
  - Will start using CDISC Library RESTful web services (former SHARE 2.0) soon
- Currently, "candidate" rules are available from a RESTful web service itself
  - Later part of the CDISC Library?
  - Your application can automatically query whether it has the latest version of the rule
  - Bug fixes in the rules can thus be made available timely
- Sponsor defined rules can easily be added and query the sponsor's own RESTful intranet services or the CDISC Library



### Open Rules and the CDISC Library API

- The CDISC Library API describes a number of RESTful web services that can be
  used by every member
- Open Rules will start using the CDISC Library API as soon as available
  - But will then require a CDISC Library license
- The Open Rules themselves may become available through the CDISC Library API
  - So that you (or better: your application) can always automatically retrieve the latest version without the need of any software update





# Open Rules and the CDISC Library API - Example (possible future implementation)

- For each variable from your define.xml ... the query ...
  - Asks the CDISC Library whether there is an associated codelist
  - Checks the define.xml codelist against the one from the CDISC Library (taking CT-version and extensibility into account)
  - Checks whether also "OTHER", "MULTIPLE", ... is allowed for that variable from the CDISC Library
  - Validates the contents in the submission files against the allowed values from the CDISC Library



### Open Rules for CDISC Standards Current actions

- "Open Rules for CDISC Standards" is now a formal CDISC Team
- Ongoing discussions with the "SDTM Rules" and "ADaM Rules" teams to further implement the rules (as defined by the SDTM and ADaM teams)
- And with CDISC management to decide what kind of implementation may become the "Reference Implementation"
- Starting discussions with FDA and PMDA to implement the FDA and PMDA rules as "Open Rules for CDISC Standards", and to make them the FDA and PMDA "reference implementation"





### **CDISC creates clarity**

### **Thank You!**

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Movie "Implementing the ADaM Rule 'A variable with a suffix of FL has a value that is not Y, N or null' " in XQuery http://xml4pharmaserver.com/OpenRulesForCDISC-Standards/movies/XQuery\_ADaM\_Rule\_5.mp4