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NON-INTERVENTIONAL STUDIES IN THE COVID-19 ERA: METHODOLOGICAL CONSIDERATIONS FOR STUDY DESIGN AND ANALYSIS

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39 ABSTRACT

40 The global COVID-19 pandemic has generated enormous morbidity and mortality, as well as
41 large health system disruptions including changes in use of prescription medications, outpatient
42 encounters, emergency department admissions, and hospitalizations. These pandemic-related
43 disruptions are reflected in real-world data derived from electronic medical records,
44 administrative claims, disease/medication registries, and mobile devices. We discuss how
45 pandemic-related disruptions in healthcare utilization may impact the conduct of non-
46 interventional studies designed to characterize the utilization and estimate the effects of
47 medical interventions on health-related outcomes. Using hypothetical studies, we highlight
48 consequences that the pandemic may have on study design elements including participant
49 selection and ascertainment of exposures, outcomes, and covariates. We discuss the
50 implications of these pandemic-related disruptions on possible threats to external validity
51 (participant selection) and internal validity (e.g., confounding, selection bias, missing data bias).
52 These concerns may be amplified in populations disproportionately impacted by COVID-19,
53 such as racial/ethnic minorities, rural residents, or people experiencing poverty. We propose a
54 general framework for researchers to carefully consider during the design and analysis of non-
55 interventional studies that use real-world data from the COVID-19 era.

56

57 KEYWORDS

58 COVID-19; real-world data; real-world evidence; methodology; study design; data analysis.

59

60 WHAT IS NEW?

- 61 • The authors discuss how pandemic-related disruptions in healthcare utilization may impact
62 the conduct of non-interventional studies designed to characterize the utilization and
63 estimate the effects of medical interventions on health-related outcomes.
- 64 • These concerns may be amplified in studies of populations that have been
65 disproportionately impacted by COVID-19, such as racial/ethnic minorities, rural residents,
66 or people experiencing poverty.

- 67 • Using hypothetical studies, we highlight consequences that the pandemic may have on
68 study design elements including participant selection and ascertainment of exposures,
69 outcomes, and covariates.
- 70 • We propose a general framework for researchers to carefully consider during the design
71 and analysis of non-interventional studies that use real-world data from the COVID-19 era.
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73 **DISCLOSURES:** After the completion of this work, Dr. Andersen became a full-time employee of
74 Pfizer Inc. Dr. Alexander is prior Chair and a current member of the FDA Peripheral and Central
75 Nervous System Advisory Committee; is a consultant and holds equity in Monument Analytics, a
76 health care consultancy whose clients include the life sciences industry as well as plaintiffs in
77 opioid litigation; and is a prior member of OptumRx's National P&T Committee. This arrangement
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82 Blumentals is an employee of and owns stock in Sanofi stock. Dr. Joynt Maddox serves on the
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94

95 INTRODUCTION

96 The global COVID-19 pandemic (1) has caused staggering morbidity and mortality as well as
97 substantial disruption to the healthcare sector including loss of health insurance (2, 3),
98 decreases in preventive care (4), deferred elective and specialty care (5, 6), delays in disease
99 diagnoses (7), changes in patient care-seeking behavior (8), and reductions in medical
100 utilization and expenditures (9). For example, early in the course of the pandemic, there were
101 increases in telemedicine programs (10) but decreases in prescription refills (11, 12), in-person
102 outpatient visits (13), emergency department visits (14, 15), and hospitalizations relative to
103 prior years (4, 16).

104 These pandemic-related disruptions will have important implications for the design and
105 conduct of non-interventional studies that use real-world data, including those derived from
106 electronic medical records (EMRs), administrative claims, disease/medication registries, and
107 mobile devices. Researchers seeking to perform non-interventional studies with real-world data
108 and policymakers seeking to understand them will need to consider how the pandemic may
109 create new challenges and exacerbate perennial challenges inherent to observational research.
110 Given changes in healthcare-seeking behavior during the pandemic, several issues are
111 important to consider in the design and conduct of studies using real-world data from the
112 pandemic era. These concerns may be amplified in studies of populations that have been
113 disproportionately impacted by COVID-19, such as racial/ethnic minorities, rural residents, or
114 people experiencing poverty (17, 18).

115 We focus on the importance of considering pandemic-related healthcare disruptions during the
116 planning stage of non-interventional studies that use real-world data. We use hypothetical
117 study examples to demonstrate the implications of pandemic-related changes on study design
118 elements, and consequently on study validity. We focus on the following study design
119 elements: participant selection, exposure assessment, outcome assessment, covariate
120 assessment, and accounting for competing risks. We discuss the implications of these
121 pandemic-related disruptions on possible threats to external validity (participant selection) and
122 internal validity (e.g., confounding, selection bias, missing data bias), and propose

123 considerations and approaches to characterize or mitigate these potential biases (**Table**). We
124 refer broadly to pandemic-related disruptions, but recognize that the timing and magnitude of
125 these disruptions varies by geography and setting of health care delivery – some disruptions
126 subsided early in the pandemic whereas others persisted (19). The proposed framework
127 extends beyond recent work focused exclusively on using real-world data to study COVID-19-
128 related treatments (20, 21), and builds upon previous work addressing the use of real-world
129 data to study non-COVID-19-related topics (22, 23). While not exhaustive of all potential study
130 design considerations, our work proposes a general framework reflective of an evolving
131 conceptualization of the conduct of non-interventional studies using real-world data from the
132 COVID-19 era. This manuscript was endorsed by the International Society for
133 Pharmacoepidemiology (ISPE).

134

135 **PARTICIPANT SELECTION: HOW HAS THE ABILITY TO SAMPLE A TARGET POPULATION**
136 **CHANGED OVER TIME?**

137 External validity refers to the extent to which an internally valid effect measured in a study
138 sample is an unbiased estimator of the treatment effect in the target population (24). An
139 important component of external validity is generalizability, which concerns making inference
140 from a possibly non-random sample back to the target population (25-27). Representative
141 sampling is not required for studies of causal inference (28), but is key for interpretation of
142 results with respect to generalizability. During the pandemic, identification of a random sample
143 of the target population using real-world data may be challenging due to substantial changes in
144 patterns of health-seeking behavior, healthcare utilization, and insurance enrollment. For
145 example, systematic differences between the target population and those who sought care
146 through a healthcare encounter, from which the study population is sampled, (5, 29) may
147 threaten external validity.

148 Consider a cohort study using a database with comprehensive pharmacy dispensing data that
149 sought to evaluate the risk of antibiotic treatment failure among women coded for urinary tract
150 infection (UTI) in the outpatient setting and dispensed a same-day antibiotic prescription. Over-

151 the-phone prescriptions likely increased during COVID, and consequently, fewer women would
152 meet study eligibility criteria in some countries due to absence of a UTI code typically assigned
153 during an in-person encounter. If patients with worse symptoms are more likely to seek in-
154 person care, cohort restriction to in-person encounters may result in a sicker study population,
155 who may also be at higher risk of the outcome. This change may result in a different sample
156 average treatment effect than the average treatment effect in the target population.

157 Another important consequence of pandemic-related disruptions is their disproportionate
158 effect on specific populations. For example, Medicaid discontinuity decreased during the
159 pandemic due to increased Medicaid enrollment (via unemployment and loss of private
160 insurance) as well as prohibitions on Medicaid disenrollment (30); consequently, studies of
161 Medicaid-insured individuals may include study populations with different characteristics
162 before versus after the pandemic. In another example, widespread and urgent implementation
163 of telemedicine programs nationwide in response to the pandemic may have
164 disproportionately served younger, well-resourced patients with stable internet access and
165 comfort with technology (4, 31); consequently, studies of telemedicine may include a low
166 proportion of older adults, racial/ethnic minorities, rural residents, or people experiencing
167 poverty.

168

169 **Approaches to Characterize or Mitigate Bias Related to Participant Selection**

170 Given concern that the pandemic may result in a lower proportion of in-person healthcare
171 encounters but among a sicker or frailer sample of the population, it is important to assess
172 temporal changes in key patient- and provider-level characteristics. For example, researchers
173 can investigate changes in severity of illness via proxies, such as receipt of kidney imaging to
174 rule out ascension of the infection from the bladder among patients with UTI. To address
175 changing study population characteristics, analyses may account for calendar time via
176 stratification or other adjustment methods.

177 Under certain conditions, direct standardization (via g-formula (32) or adjustment formula (33,
178 34)), or inverse probability of sampling weights, can be used to estimate the population average

179 treatment effect when the study sample is not a random sample of the target population.
180 These estimators use data from the study sample on the exposure–outcome relationship and
181 data from the target population on either (a) the distribution of pretreatment covariates for the
182 g-formula estimator or (b) the sampling probabilities conditional on pretreatment covariates for
183 the inverse probability of sampling estimator (25). Details and illustrative examples are
184 available in Lesko et al. (25).

185 When possible, researchers should seek and demand data sources (directly or via data linkages)
186 that enable study of historically marginalized populations. For example, study inclusion of low-
187 income populations or individuals living in residential facilities (e.g., jails/prisons) can enable
188 results that generalize to important sub-populations, and ultimately contribute to overcoming a
189 long history of underrepresentation in epidemiology and health services research (35). Robust
190 feasibility assessments of data options are needed to identify and select fit-for-purpose data
191 sources (36). Additionally, collaborations and initiatives across sectors such as government,
192 clinical practice, epidemiology, and informatics can improve the presence or accuracy of
193 variables (e.g., race/ethnicity, socio-economic status) critical for studying historically
194 marginalized populations.

195

196 **EXPOSURE ASSESSMENT: CAN EXPOSURES BE ACCURATELY IDENTIFIED?**

197 Typically, studies of medications define the start date of the treatment exposure window based
198 on the dispensing date of the first or second prescription of interest, after requiring a washout
199 period without documentation of drug dispensing. Similarly, discontinuation dates are often
200 defined as the dispensing date of the last prescription date plus the sum of the days' supply and
201 a grace period (37). However, studies that use real-world data to define treatment exposure are
202 susceptible to bias from unobservable factors including drug initiation, timing of initiation, and
203 adherence. Furthermore, studies reflecting the pandemic era may be susceptible to additional
204 biases related to exposure misclassification given disruptions to prescription drug utilization
205 such as drug stockpiling (11, 12, 22), increased flexibility in take-home scheduling (e.g.,
206 methadone (38)), and decreased adherence to chronic medications (39).

207 For example, dates of drug initiation and discontinuation may be less reliable given drug
208 stockpiling. Prescription fills for lisinopril (angiotensin-converting enzyme [ACE] inhibitor) and
209 losartan (angiotensin receptor blocker [ARB]) peaked the week after the March 13, 2020
210 declaration of a national emergency by the U.S. (11). In a new-user study of ACE inhibitor users
211 versus ARB users—restricted to patients who did not use either drug during the washout
212 period—it is plausible that continuous users who stockpiled ACE inhibitors or ARBs may be
213 misclassified as new users. In this scenario, inclusion of prevalent users may introduce
214 prevalent user biases, particularly if the proportion of person-time is substantial among
215 prevalent users. This “depletion of susceptibles” phenomenon occurs because prevalent users
216 only represent the “survivor” subset of all initiators; it excludes individuals who became
217 nonadherent due to experiencing events during the early period of pharmacotherapy, which
218 may lead to substantial bias.

219

220 **Approaches to Characterize or Mitigate Bias Related to Exposure Assessment**

221 Assessing temporal trends in the prevalence of exposure by calendar time relative to COVID-19
222 may be useful for identifying the impact of pandemic-related changes in healthcare utilization,
223 such as declines in laboratory tests to inform medication prescribing (6, 8). Approaches are also
224 available to address misclassification or partial missingness of exposure. In some settings,
225 restricting the study period to the pre-pandemic era may reduce misclassification. Also,
226 stratifying analyses by calendar time relative to COVID-19 will provide effect estimates by time
227 period, providing insight into the robustness of results. These analyses can be performed as
228 primary, secondary, or sensitivity analyses, as applicable. To assess the possible impact of drug
229 stockpiling on exposure misclassification, investigators can vary the washout period duration
230 (e.g., 6, 12, or 18 months) to identify new-users or vary the grace period that defines date of
231 discontinuation. To evaluate the extent of pandemic-related nonadherence to medications (i.e.,
232 persistence and implementation), investigators can assess individual-level drug dispensing data
233 by applying common methods such as the refill gap method, the anniversary model, the
234 proportion of days covered, and the medication possession ratio (40). In the setting of

235 comparative effectiveness research, inverse probability weighting, g-estimation, and
236 instrumental variable estimation can reduce bias introduced by nonadherence (41).

237 There are also additional approaches, which are outside of the main scope of this paper. For
238 example, in scenarios when exposure information is partly missing, two-stage g-computation
239 designs offer principled approaches to handle the missingness (42). Two-stage g-computation
240 estimators leverage partially observed information on the full study sample and complete
241 exposure information on a subset to estimate causal effects. Additional methods available to
242 address exposure misclassification include simple bias analysis (43-45), probabilistic bias
243 analysis (43, 44, 46-48), Bayesian bias analysis (43, 49-51), modified maximum likelihood (52-
244 55), multiple imputation for measurement error (56, 57), and regression calibration (58-60).
245 Funk and Landi summarize these methods and provide examples (61).

246

247 **OUTCOME ASSESSMENT: CAN OUTCOMES BE ACCURATELY IDENTIFIED?**

248 In non-interventional studies using real-world data, outcomes are commonly defined based on
249 diagnoses, procedures, prescriptions, or healthcare encounters recorded by clinicians in routine
250 care or by health insurance companies for billing purposes. Pandemic-induced changes to
251 patient care-seeking behaviors, healthcare utilization, and (in some countries) insurance
252 coverage may impact the accuracy, completeness, and timeliness of outcome assessment.
253 Thus, outcome misclassification may occur more commonly in studies using real-world data
254 generated in the pandemic. Consider a cohort study comparing risk of venous
255 thromboembolism (VTE) between initiators of different oral contraceptives, where VTE is
256 defined by the presence of diagnosis codes and radiology reports. Compared to the pre-
257 pandemic era, VTE diagnosis among patients with mild/moderate symptoms may occur less
258 frequently due to declines in in-person physical exams and diagnostic testing (62). Typically,
259 nondifferential outcome misclassification results in bias toward the null and underestimates of
260 VTE risk, whereas differential outcome misclassification (i.e., differential VTE underdiagnosis by
261 formulation) may result in bias that either exaggerates or underestimates VTE risk (61).

262 Selection bias due to differential loss-to-follow-up, also known as informative censoring (63),
263 represents another common threat to internal validity in cohort studies. The current standard
264 in epidemiological research is to treat loss-to-follow-up, such as health plan disenrollment, as a
265 censoring event that occurs independently of the outcome, and thus as a type of
266 noninformative censoring. However, recent evidence of differential risk of disenrollment by
267 patient- and health-plan level characteristics raises the possibility that treating health plan
268 disenrollment as an independent censoring event may bias descriptive statistics as well as
269 estimates of causal effect (64, 65). Consequently, selection bias may be more pronounced in
270 studies using real-world data collected during the pandemic, since pandemic-related increases
271 in unemployment and subsequent health plan disenrollment resulted in more loss-to-follow-up
272 in specific subpopulations.

273 In addition, due to changes in healthcare utilization patterns during the pandemic, the length of
274 time between disease diagnosis and treatment initiation may increase due to delays in
275 receiving medical care and treatments (5, 66). Consider a cohort study designed to quantify
276 progression-free and overall survival among patients with resectable pancreatic cancer
277 receiving neoadjuvant chemotherapy followed by surgery. But, during the pandemic, cancer
278 patients may experience longer delays in initiation of treatment, impacting patient outcomes
279 regardless of treatment type (due to delayed treatment initiation). Therefore, time from
280 diagnosis to treatment initiation may differ by time relative to the pandemic (e.g., pre-
281 pandemic versus pandemic era).

282

283 **Approaches to Characterize or Mitigate Bias Related to Outcome Assessment**

284 Little is known about the performance of algorithms using data from the COVID-19 era, thus,
285 validation studies are critically needed. In addition, other standard approaches are available to
286 address biases related to outcome assessment. Restricting or stratifying analyses by calendar
287 time relative to COVID-19 or leveraging additional data may improve the validity and
288 completeness of outcomes. For example, the accuracy of an algorithm to identify VTE may be
289 enhanced by leveraging pharmacy claims or unstructured EHR notes. Furthermore, EHR data
290 can be linked with additional data sources, such as the master death file, hospital data and/or

291 the national death index. Rivera et al. and Pratt et al. provide guidance on the appropriateness,
292 feasibility, evaluation, and reporting of data linkages (67, 68).

293 To mitigate outcome misclassification, researchers ought to select outcomes robust to
294 pandemic-related changes, such as outcomes that avoid reliance on outpatient and emergency
295 department encounters that declined during the pandemic. For example, in the
296 aforementioned UTI study, selecting a primary outcome that almost exclusively requires
297 hospitalization, such as pyelonephritis, may be advantageous. Also, sensitivity analyses are
298 needed to quantify the impact of outcome misclassification on estimates and the uncertainty
299 around these estimates. Available methods are described above (43-46, 48, 49, 51, 52, 55-57,
300 61).

301 To mitigate selection bias, advanced statistical methods are available to handle outcome
302 missingness or loss-to-follow-up. First, it is important to understand which individuals are at
303 greatest risk of missing outcome data or loss-to-follow-up during COVID-19, and whether or not
304 data are missing at random, missing completely at random, or missing not at random. Multiple
305 imputation is an appropriate framework for dealing with data when missing at random or
306 completely at random, and offers protection in some missing not at random contexts (69-71).
307 Other analytic approaches, such as Bayesian imputation or doubly robust estimators may be
308 explored (72-74), and sensitivity analysis may be conducted to evaluate the robustness of the
309 different approaches. In scenarios with high potential for selection bias, appropriate methods
310 to address selection bias should be applied including standard regression adjustment, joint
311 modeling, and inverse probability of censoring-weighted estimation (63, 64, 74-83).

312 To understand differential delays between disease diagnosis and treatment between
313 comparator groups if selected from different time periods, descriptive analyses may be
314 conducted. For example, the time between diagnosis and treatment initiation can be assessed
315 to detect irregularities during the pandemic; this parameter can be used as a descriptive
316 statistic or a proxy measure to obtain confounding control. Sensitivity analyses are needed to
317 address calendar-time (via restriction, stratification, modeling, matching, or weighting).

318

319 COVARIATE ASSESSMENT: IDENTIFYING POTENTIAL CONFOUNDERS AND EFFECT MODIFIERS

320 Confounding bias arises in the presence of nonexchangeability across exposure groups—due to
321 the imbalance of (typically) causes of the outcome across levels of the exposure (84)—and is an
322 inherent limitation of non-interventional studies due to lack of randomization. Missing data on
323 covariates that affect the exposure and independently affect the outcome may bias effect
324 estimates due to residual confounding. The ability to ascertain information on potential
325 confounders and account for confounding in studies using real-world data may be particularly
326 challenging during COVID-19. Pandemic-related stay-home orders resulted in a decline of in-
327 person healthcare encounters and an increase in telemedicine visits, resulting in absence of
328 routinely collected clinical measurements (e.g., body mass index, blood pressure) and
329 laboratory results (e.g., hemoglobin A1c). This is problematic in real-world data studies because
330 the absence of a documented diagnosis or procedure is typically interpreted as the absence of
331 the condition. And, the extent of missingness may be differential by specialty or
332 disease/indication due to varying impacts of the pandemic on healthcare delivery. Thus,
333 estimates of treatment effects may be subject to more residual confounding during COVID-19
334 due to missing information on a variety of potential confounders.

335 A new consideration for studies using pandemic-era data is the possibility for COVID-19
336 infection history or COVID-19 vaccination status to be confounders of the exposure-outcome
337 relationship under study. The ability for COVID-19 infection history or vaccination status to bias
338 treatment effect estimates will be wide-ranging given the substantial COVID-19 burden of acute
339 clinical manifestations and post-acute sequelae (85). For example, in a study aiming to estimate
340 the comparative risk of cardiovascular events for several antidiabetic medications, COVID-19
341 infection history may be a potential confounder if recipients of a particular antidiabetic
342 medication have a differential history of COVID-19 infection and differential risk of the
343 outcome. COVID-19 infection history and COVID-19 vaccination status may also be effect
344 measure modifiers, resulting in treatment effect heterogeneity.

345

346 **Approaches to Characterize or Mitigate Bias Related to Covariate Assessment**

347 There are several rigorous epidemiologic study design decisions that can reduce or detect the
348 potential for confounding by measured and unmeasured confounders. First, in studies of the
349 comparative effects of medical interventions, use of an active comparator new-user study
350 design is a powerful tool to balance the treatment groups with respect to patient characteristics
351 and to reduce measured and unmeasured confounding by indication and frailty bias (86, 87).
352 The active comparator aspect of the design requires restriction of the study population to
353 patients who receive the medical intervention of interest or an alternative intervention
354 commonly administered to patients with the same indication and without contraindications.
355 Second, assessment of baseline confounders during an all-available covariate assessment
356 period is generally preferable to the fixed-duration approach (e.g., 6 months pre-index) because
357 it performs similarly or reduces overall confounder misclassification by increasing the sensitivity
358 of confounder measurement (88-90). Third, since missingness of potential confounders likely
359 varies over calendar time, study designs that account for time (e.g., calendar-time specific
360 propensity scores, matching on index date) may mitigate differences between exposure groups
361 (91, 92). Fourth, negative control exposures and outcomes can detect, quantify, and correct for
362 uncontrolled confounding (93-95). Lastly, propensity score calibration or data linkages can
363 reduce missingness of potential confounders.

364 In addition, standard statistical approaches, such as multivariable regression models or
365 propensity score methods, can be employed to account for confounding when potential
366 confounders are adequately measured. Analytic approaches to handle missing data on
367 potential confounders include complete-case analysis, last observation carried forward, the
368 missingness pattern approach, multiple imputation, and inverse-probability-of-missingness
369 weighting (96). Instrumental variable methods can address uncontrolled confounding when
370 potential confounders are not adequately measured, as long as a suitable instrument exists (97,
371 98). However, the use of calendar time as an instrument—a common choice in comparative
372 effectiveness studies—will likely violate the instrumental variable assumptions during COVID-
373 19, since calendar time may affect an outcome, such as mortality, in ways other than through
374 the exposure (99).

375 Sensitivity analyses are needed to quantify the impact of covariate misclassification on
376 estimates and the uncertainty around these estimates. Available methods include regression
377 calibration (100, 101) as well as those described above (43-49, 51, 52, 56-58, 60, 61).

378 To address the possibility of confounding by COVID-19 infection history, investigators may treat
379 documented COVID-19 infection as: a) an exclusion criterion if diagnosed on or before the index
380 date; b) a censoring event if diagnosed during the follow-up period; or c) a confounder in the
381 analysis. Treatment effect heterogeneity by COVID-19 infection history should also be
382 evaluated, particularly in populations with high COVID-19 prevalence. However, these
383 approaches may be limited by variability in testing capacity for SARS-CoV-2 infection and
384 validity of COVID-19 diagnostic codes across settings and calendar time (102-104).

385

386 **ACCOUNTING FOR COMPETING RISKS**

387 In time-to-event analyses, individuals are observed from the start of the follow-up period until
388 the occurrence of the event of interest, a competing event, or a censoring event. Competing
389 events preclude the outcome of interest from occurring. For example, patients who die before
390 experiencing a stroke will never be observed to have the event of interest.

391 Given that COVID-19 caused substantial excess mortality, it is crucial to treat mortality as a
392 competing event in studies with populations who experienced high COVID-19-related mortality,
393 such as older adults or institutionalized individuals. Even though competing events are
394 ubiquitous in epidemiological data, researchers frequently simplify analyses by treating
395 competing events as censoring events, thus generating estimates of conditional risk defined as
396 the risk that would be observed if all competing events were prevented without altering the
397 hazard of the event of interest (43, 105, 106). However, the assumptions necessary for
398 interpreting conditional risks limits the utility of these estimates for measuring public health
399 impact. Since the degree of inflation of the estimate is proportional to the incidence of the
400 competing event, censoring the competing events when competing events are common can
401 dramatically distort estimates of risk (107).

402

403 Approaches to Characterize or Mitigate Bias Related to Competing Risks

404 The competing-risk approach provides an estimate of the total amount of the event of interest
405 that will occur in the population, which may provide estimates with greater accuracy and
406 precision for health care policy and planning, compared to censoring the competing events.
407 Researchers should assess their data sources with regards to the identifiability and frequency of
408 competing risks in their study sample (e.g., mortality), and consider using analytic methods to
409 account for competing risks. The Aalen-Johansen estimator is straightforward to implement and
410 can be used to generate interpretable, policy-relevant estimates of risk in the presence of
411 competing events (108). Edwards et al. provide detail on competing risks methodology and
412 provide applied examples from non-interventional studies using real-world data (107).

413

414 DISCUSSION

415 Non-interventional studies are important for augmenting RCT evidence and generating
416 evidence from real-world populations, but designing high-quality studies in the COVID-19 era
417 requires careful consideration. We outline several challenges inherent to non-interventional
418 research, and discuss how disruptions to healthcare utilization and outcomes during the COVID-
419 19-pandemic pose challenges to the validity of non-interventional studies. Our proposed
420 framework addresses several important methodological considerations in the design of non-
421 interventional studies using pandemic-era real-world data. Researchers may find the guidance
422 particularly useful for studies of populations that have been disproportionately impacted by
423 COVID-19, such as racial/ethnic minorities, rural residents, or people experiencing poverty.
424 Detailed attention to study design and analytic decisions have broad implications for the quality
425 of future studies using real-world data from the pandemic-era. Our recommendations will
426 foster improvements in the design and conduct of future non-interventional studies using real-
427 world data and enhance the ability of future studies to provide rigorous evidence that is critical
428 to patients, caregivers, clinicians, payers, policymakers, and other stakeholders.

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Table. Considerations and Approaches To Address COVID-19 Pandemic-Induced Threats To Validity

<i>COVID-19 Pandemic-Induced Considerations</i>	<i>Possible Threats to Validity</i>	<i>Approaches to Characterize or Mitigate Bias</i>
<i>PARTICIPANT SELECTION: HOW HAS THE ABILITY TO SAMPLE A TARGET POPULATION CHANGED OVER TIME?</i>		
<ul style="list-style-type: none"> Stay-home orders led to missed or delayed healthcare encounters altogether, resulting in under-diagnoses and under-treatment Patient populations who sought treatment via healthcare encounters during pandemic may comprise non-random subset of target population (e.g., more sick/frail) Some populations may be disproportionately impacted by COVID-19 (e.g., racial/ethnic minorities, rural residents, low-income) Changes over time in patient populations (e.g., telemedicine, Medicaid-insured) 	<ul style="list-style-type: none"> Reduced generalizability (external validity) due to inability to identify representative sample of target population 	<ul style="list-style-type: none"> Assess changes over time of baseline characteristics by exposure group, such as pre-COVID-19 versus COVID-19 eras Account for calendar time via restriction or stratification Use direct standardization (g-formula, adjustment formula) or inverse probability of sampling weights to estimate the population average treatment effect when study sample is not random sample of target population Conduct robust feasibility assessment of database options to select fit-for-purpose data sources, including careful consideration of ability to study historically marginalized populations (overall or subgroup analyses) Leverage additional data sources*
<i>EXPOSURE ASSESSMENT: CAN EXPOSURES BE ACCURATELY IDENTIFIED?</i>		
<ul style="list-style-type: none"> Stay-home orders resulted in stockpiling of drugs, resulting in limited ability to accurately identify start and stop dates of prescription drugs Increased flexibility in take-home scheduling for scheduled medications Possible decreases in medication adherence due to pandemic-related barriers to health care access 	<ul style="list-style-type: none"> Exposure misclassification via inability to identify new-users of drugs or drug discontinuation Exposure misclassification due to non-adherence Missing data bias 	<ul style="list-style-type: none"> Assess temporal trends in prevalence of exposure Account for calendar time via restriction or stratification Apply two-stage g-computation designs for handling missing exposure information Conduct sensitivity analyses to vary exposure definitions and quantify potential impact of exposure misclassification Assess adherence using refill gap method, anniversary model, proportion of days covered, medication possession ratio Use inverse probability weighting, instrumental variable estimation, or g-estimation to reduce bias from nonadherence Leverage additional data sources*
<i>OUTCOME ASSESSMENT: CAN OUTCOMES BE ACCURATELY IDENTIFIED?</i>		
<ul style="list-style-type: none"> Incomplete ascertainment of outcomes with lower severity of illness (that did not require healthcare encounter) Prolonged time between visits delay initiation of treatment/comptent progression Loss of employment/insurance coverage may result in loss-to-follow-up/missing outcomes 	<ul style="list-style-type: none"> Outcome misclassification Selection bias due to differential loss-to-follow-up Missing data bias 	<ul style="list-style-type: none"> Consider outcome definitions that are robust to pandemic-related changes in healthcare utilization Assess and describe temporal trends in prevalence of outcome Account for calendar time via restriction, stratification, matching, weighting, or multivariable adjustment Sensitivity analyses varying algorithms to define outcomes and quantify potential impact of outcome misclassification

- Some populations may be disproportionately impacted by COVID-19 (e.g., racial/ethnic minorities, rural residents, low-income)
- Delay in treatment initiation impacts outcomes regardless of treatment
- Leverage additional data sources*

COVARIATE ASSESSMENT: IDENTIFYING POTENTIAL CONFOUNDERS AND EFFECT MEASURE MODIFIERS

- Stay-home orders resulted in missed or delayed healthcare encounters altogether, resulting in the absence of recorded data
- Increased telemedicine leads to missing data on clinical measurements (e.g., height, weight, blood pressure) and routine laboratory results (e.g., hemoglobin A1c)
- Confounding due to unmeasured or poorly measured covariates
- Confounding and/or effect measure modification by COVID-19 status
- Missing data bias
- Assess temporal trends in prevalence of potential confounders
- Define potential confounders using all-available covariate assessment period
- Consider strategies for missing confounders such as complete-case analysis, last observation carried forward, the missingness pattern approach, multiple imputation, and inverse-probability-of-missingness weighting
- Use negative controls to quantify uncontrolled confounding
- Restrict/stratify study population by COVID-19 infection history
- Censor patient follow-up on COVID-19 infection diagnosis date
- Account for COVID-19 status as a confounder via restriction, stratification, matching, weighting, or multivariable adjustment
- Account for calendar time via restriction, stratification, matching, weighting, or multivariable adjustment
- Use restriction, stratification, matching, weighting, or multivariable adjustment to account for factors associated with differential impact of COVID-19 (e.g., race/ethnicity, income)
- Sensitivity analyses varying algorithms to define covariates (e.g., duration of look-back period) and quantify potential impact of confounding
- Replicate analyses among different data sources
- Leverage additional data sources*

ACCOUNTING FOR COMPETING RISKS

- COVID-19 resulted in high mortality, particularly in certain subpopulations
- Mortality is a competing event which precludes occurrence of many outcomes of interest
- Inflation of risk estimates when competing events are treated as censoring events
- Assess frequency of competing events
- Use methods to estimate risk accounting for competing events
- Compare results to those obtained using analytic simplifications commonly used to handle competing events, such as treating competing events as censoring events

*Leveraging additional data sources can enrich existing data in several ways (e.g., capture structured and unstructured data fields; include various types of healthcare encounters and communications such as office visits, telehealth visits, phone/email communications; inclusion of a different population).

WHAT IS NEW?

- The authors discuss how pandemic-related disruptions in healthcare utilization may impact the conduct of non-interventional studies designed to estimate the utilization and effects of medical interventions on health-related outcomes.
- These concerns may be amplified in studies of populations that have been disproportionately impacted by COVID-19, such as racial/ethnic minorities, rural residents, or people experiencing poverty.
- Using hypothetical studies, we highlight consequences that the pandemic may have on study design elements including participant selection and ascertainment of exposures, outcomes, and covariates.
- We propose a general framework for researchers to carefully consider during the design and analysis of non-interventional studies that use real-world data from the COVID-19 era.

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Author Statement

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