

Is it time to rethink proxy-reporting? Feasibility and psychometric considerations for creating ObsROs that adhere to Patient-Focused Drug Development (PFDD) fit-for-purpose guidance

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Introduction & Background

- FDA Patient-Focused Drug Development (PFDD) guidance¹ discourages proxy reporting in favor of observer reporting.
- An established theoretical approach² to pediatric outcomes defines measures as:
 - Observational Measures = assess an observable sign, symptom, behavior, or verbalization without requiring interpretation or inference
 - Proxy Measures = asks for the reporter's interpretation or inference of the child's internal state(s)
- Our experience applying PFDD guidance indicates that other types of items could be problematic:
 - Items that ask the reporter to make an attribution of an indicator to an internal state
 - Items that might be answered using information not directly observed by the reporter (subject to 3rd party information)
- Patient-Reported Outcomes Measurement Information System (PROMIS)³ item banks allow for creating custom short-forms (SFs)

Objective

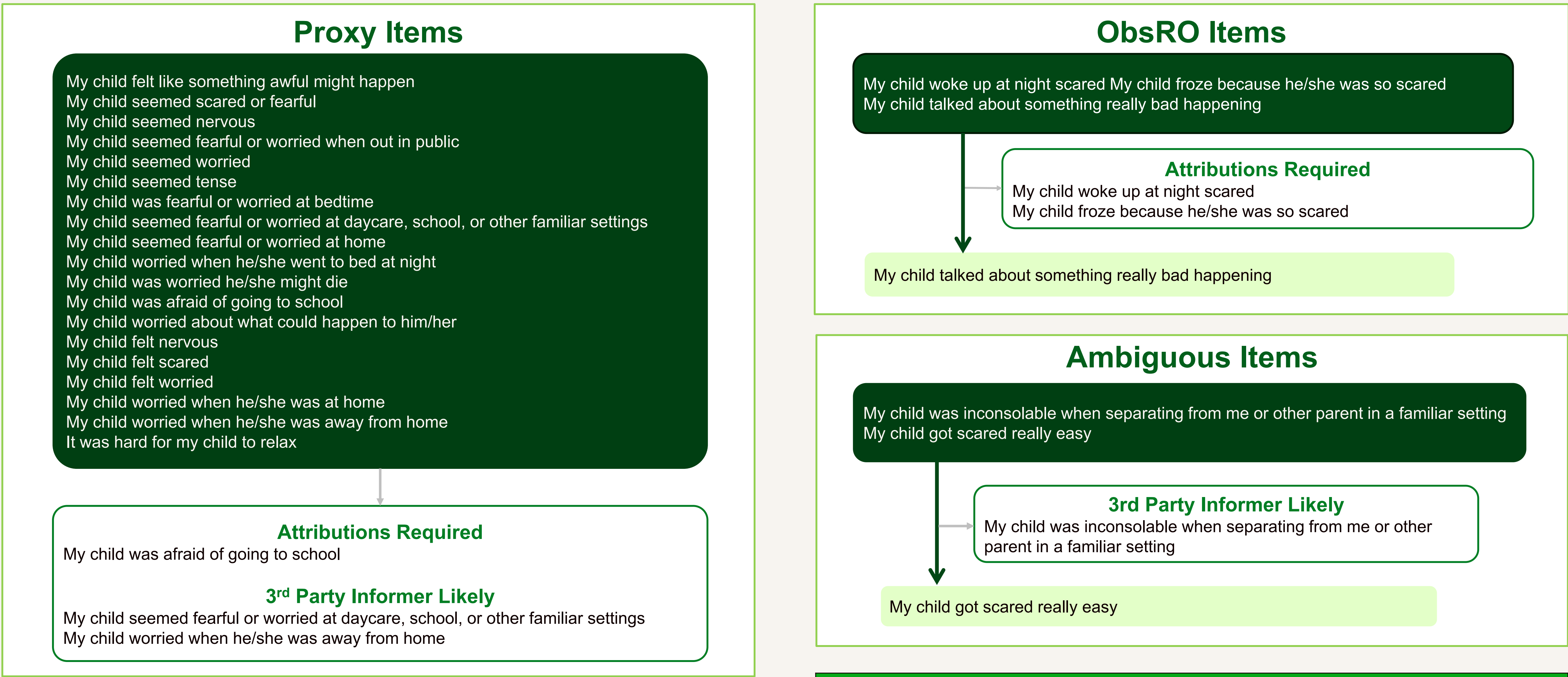
- Evaluate the feasibility building custom SFs that could qualify as observer reported outcomes (ObsROs) per FDA PFDD guidance.

Methods

- PROMIS Parent Proxy and Early Childhood Parent Report item banks for anxiety and physical activity were evaluated with 24 and 10 unique items, respectively³.
- Two independent raters coded items as “observable” (assessing observable signs/indicators) or “proxy” (assessing internal states).
- Codebook revision added “ambiguous” to accommodate items with multiple interpretations.
- Items were also reviewed to assess if they were likely to be subject to 3rd party information and if they asked for attribution of indicators to internal states.
- Reconciliation resulted in creation of custom SFs from “observable” items, which were evaluated against PFDD guidance.

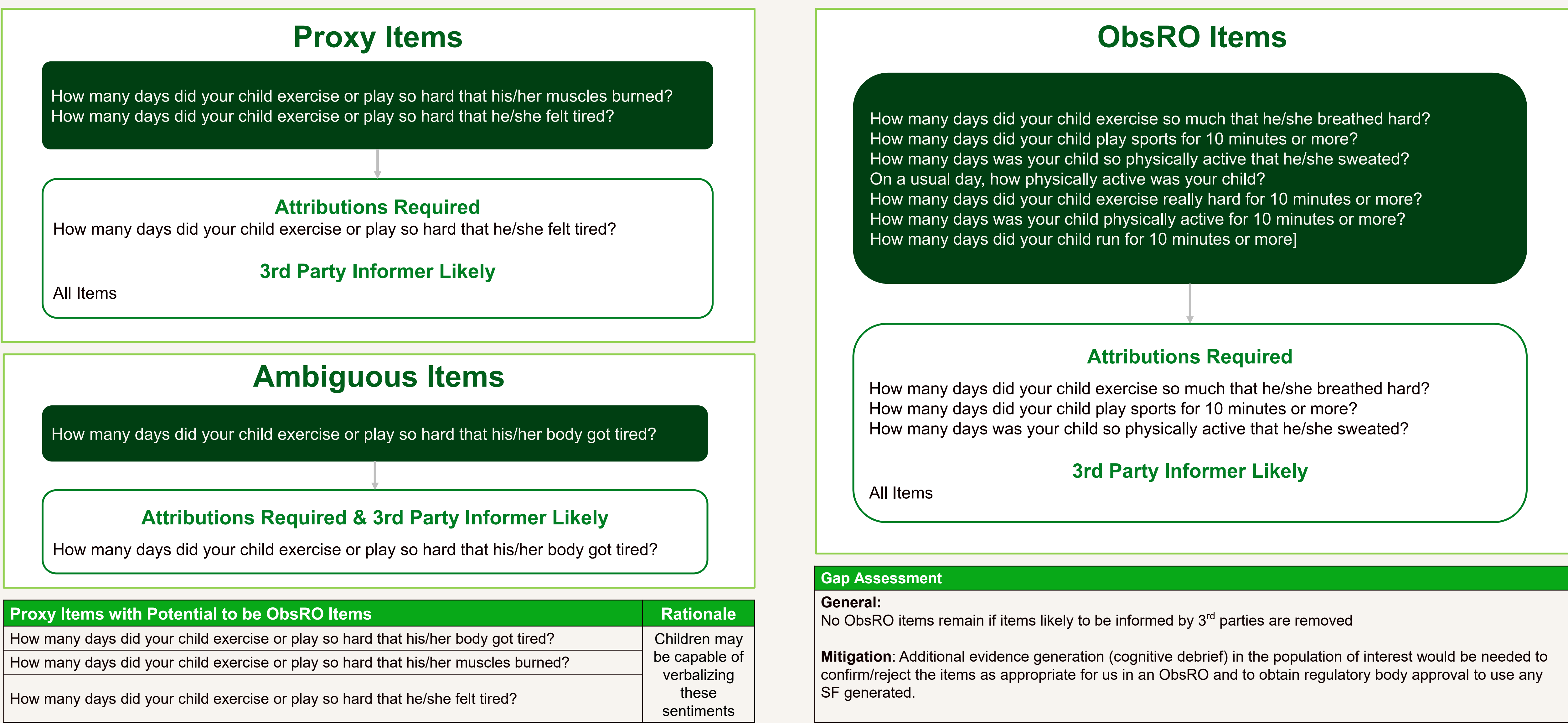
Codebook	
ObsRO Item	An indicator (observable sign or behavior) is mentioned in the item stem.
Ambiguous Item	The concept could be interpreted as an indicator or an internal state.
Proxy Item	No indicators are mentioned in the item stem.
3 rd Party Informer Likely	The item stem would likely require a third-party informer (e.g., teacher, other caregiver) or be subject to information obtained from third-party informers
Attribution Required	The item stem explicitly asks the caregiver to attribute an indicator to an internal state.

Anxiety Item Bank



Proxy Items with Potential to be ObsRO Items	Rationale
My child got scared really easy	"Got scared easily" is likely to be indicated by observable signs
My child felt like something awful might happen]	Children may be capable of verbalizing these sentiments
My child worried when he/she went to bed at night.	
My child was worried he/she might die	
My child was fearful or worried at bedtime	
My child seemed scared or fearful	"Seemed" language may indicate to make judgements based on observed indicators or verbalizations
My child seemed nervous	
My child seemed fearful or worried when out in public	
My child seemed worried	
My child seemed tense	
My child seemed fearful or worried at home	

Physical Function Item Bank



Results

- For anxiety, the ObsRO SF retained 3 items
 - None were likely subject to 3rd party information
 - 2 of these asked for attribution of indicators to internal states
 - Of excluded items, 2 were coded “ambiguous”, and 19 were coded as “proxy”.
- For physical activity, the ObsRO SF retained 7 items
 - All 7 were likely subject to 3rd party information
 - 2 items asked for attribution of indicators to internal states
 - Of excluded items, 1 was coded “ambiguous”, and 2 were coded as “proxy”.
- Evaluation of the SFs against PFDD guidance suggested risk of insufficient conceptual coverage and error variance related to increased focus on strictly measuring observable indicators.
- In both item banks, some items identified as Proxy items did not name observable indicators but may be answered based on verbalizations or observable indicators – confirmation with study populations would be required

Conclusions

- Dichotomization (Observer versus Proxy reporting) may not be a practical theoretical approach for building SFs.
 - Many items include ambiguous language or language that could be interpreted in multiple ways
 - Parent/caregivers may report on an internal state using observed signs and indicators
- Furthermore, proxy- and observer reporting-type items contribute different potential sources of error variance (e.g., attribution of indicators versus restricted conceptual coverage).
- Balancing the sources of measurement error for each study and its population is required to build fit-for-purpose instrumentation that captures meaningful information reliably.

Abbreviations

PFDD = Patient-Focused Drug Development
PROMIS = Patient-Reported Outcomes Measurement Information Systems
ObsRO = Observer-Reported Outcomes
SF = Short Form

References

- US FDA PFDD Guidance. <https://www.fda.gov/drugs/development-approval-process-drugs/fda-patient-focused-drug-development-guidance-series-enhancing-incorporation-patients-voice-medical>
- Matza LS, et al. Pediatric Patient-Reported Outcome Instruments for Research to Support Medical Product Labeling: Report of the ISPOR PRO Good Research Practices for the Assessment of Children and Adolescents Task Force. VALUEINHEALTH16(2013)461 - 479
- PROMIS. <https://www.healthmeasures.net/index.php>