

Patients concerns about the AP-HP Clinical Data Repository

European i2b2 meeting

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Context and motivation

- The AP-HP CDR (8M patients) consolidates clinical data extracted from the hospital information system
- To support comparative effectiveness research, mainly observational studies and clinical research.
- A major challenge is to get the fair balance between supporting medical research
 - ▶ by increasing efficient access to data stored in research platforms
 - ▶ and ensuring the effectiveness of data subject's rights to confidentiality, transparency and to opt out of the sharing of patient personal information.

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Material and Method

Material

- AP-HP CDR = IT solution for Big Data integration & exploitation
- French law on data protection (CNIL)
 - ▶ Authorization for building the CDR about 3 finalities (deliberation n°2017-013 – 19/01/2017)
 - *Multicentric non interventional studies on data*
 - *Feasibility studies for clinical trial*
 - *Studies conducted by doctors at Medical Information Department (DIM)*
- Commitment to comply with MR003 procedure (common reference)
 - ▶ Collective and individual Information to patients and healthcare professionals
- IT and freedoms correspondent at IT System Department, in regular contact with the National Commission for Data Protection and Liberties (CNIL-France)
 - ▶ towards DPO ?

Patient information about their rights

■ Collective information

- ▶ Welcome booklet
- ▶ Web Site <http://recherche.aphp.fr/eds>
- ▶ An insert in newspapers
- ▶ Poster campaign

■ Individual information

- ▶ New patient at hospital : insert in hospitalization reports
- ▶ CDR (10 years history): E-mailing and sample paper mailing campaign

■ Opt-out modality

- ▶ Provide a clearly process for the patient to opt out of processing their individual data for health research, without justification

Method

- **476,145 emails and 13,015 paper mails were sent on July 31 and August 29**
 - ▶ All the e-mail addresses known in IT System Patient cases database
 - ▶ Methodology to sample the paper mails to ensure a representativeness of AP-HP Hospitals
- **Including information about**
 - ▶ AP-HP CDR
 - ▶ Opt-out procedure
 - ▶ Link to Frequently Asked Questions (FAQ) page of the clinical research and innovation office web site
- **A procedure was organized to address efficiently opt-out requests and patients' concerns.**

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Results

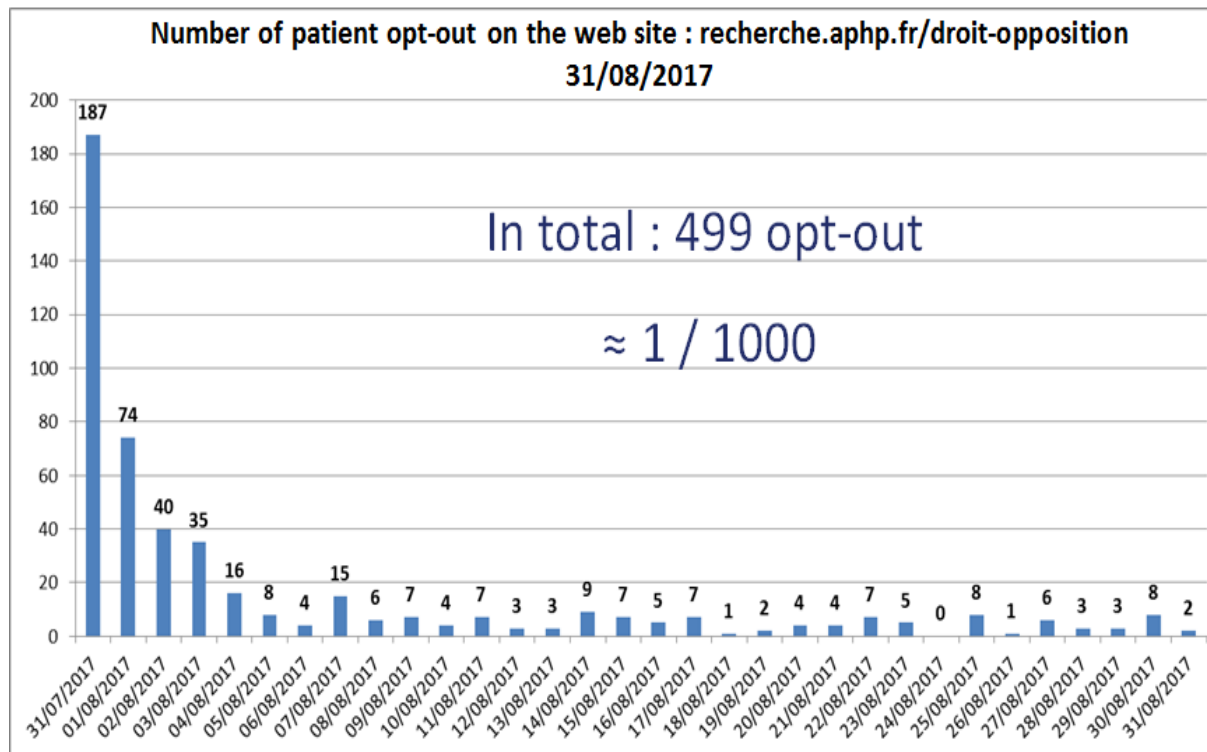
Results 1/3

- The website received more than 8,000 visits on July 31 (usually 300 visits per day),
- 499 patients opted out of processing their individual data for health research
- and 31 reached the institution to express sensitive concerns related to data protection and to the opt-out procedure
- The institution answered the patients and the FAQ were updated accordingly

Statistics about e-mailing campaign at 04/08/2017 :
476 145 Sent
148 993 Opened
2 109 Unsubscribing
89 408 Errors

Results 2/3

- A pick the “D-day” of the e-mailing, and a tightly decrease in the 5 next days
- Then, an average of 3-4 opting-out per day



Results 3/3

- Typology of patient's reply
- 31 responses analyzed (*several topics per answer*) - 5 categories of concerns
- Opportunities
 - ▶ Transparency, patient participation (*engagement, private/public use*) – 18
 - *"I agree that medical information about me should be used to improve treatment"*
 - ▶ Data property and patient remuneration – 2
 - *"Can I be paid for the use of my data?"*
- Threats
 - ▶ Consent (*level of consent, difficulty to opt out*) – 13
 - *"I cannot go through the on-line opt-out procedure. How can I more simply opt out?"*
 - ▶ Privacy, security – 6
 - *"What about patient anonymity?"*
 - *"What about the security of data loaded into AP-HP clinical data warehouse?"*
 - ▶ Data property and business model – 5
 - *"Can you provide me copies of my medical reports before re-using them?"*

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Conclusion

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■ Question of the democratic data governance

- ▶ Informing Patients about their right induce various reactions (positive, negative, rough, suspicious about data security and data confidentiality, ...)

■ Ethical issues need to be addressed effectively at the early phase of the project to fully realize the potential of big data in medical research

<https://recherche.aphp.fr/eds/information-patient/>

Many thanks !

Contact

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