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Journal

Hepatology, 66(4)

ISSN

0270-9139

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Publication Date

2017-10-01

DOI

10.1002/hep.29269

Peer reviewed



Published in final edited form as:

*Hepatology*. 2017 October ; 66(4): 1144–1150. doi:10.1002/hep.29269.

## BIASES IN THE REPORTING OF HCC TUMOR SIZES ON THE LIVER TRANSPLANT WAITING LIST

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### Abstract

We investigate the possibility that patients with hepatocellular carcinoma (HCC) listed for liver transplant with tumors just outside Stage T2 size criteria may be inaccurately reported as just meeting the tumor size criteria for transplant. The UNOS/STAR database identified 12,958 patients listed for liver transplants with HCC exception points from 2006–2013, 9,168 of whom were listed with one tumor. A logistic power peak function was fitted to the single-tumor size histogram, with the fitted values representing unbiased expected values. The difference between the observed and expected tumor counts for 2.0cm and 5.0cm was 238 (22%) and 66 (57%), respectively. This suggests that up to 304 (3.0%) patients with tumors outside of transplant criteria had their measurements recorded at the margins of eligibility. A risk-adjusted Poisson model evaluated the ratio of observed to expected (O:E) HCC recurrence by tumor size. There were 435 HCC recurrences among 6,049 transplants. Only 2.0cm tumors had O:E recurrence differing from 1 (ratio 0.73, 95%CI 0.57–0.94), indicating a 27% lower than expected rate of recurrence.

**Conclusion**—Higher than expected observed tumor counts at the lower transplant criteria margin were corroborated by lower than expected HCC recurrence, suggesting that tumor sizes at the margins of HCC transplant criteria may be subject to inaccurate reporting.

### Keywords

Hepatocellular carcinoma; liver transplant; waitlist eligibility; forensic analytics

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Hepatocellular carcinoma (HCC) is an important indication for liver transplantation: HCC accounted for 11.6% of the liver transplant waiting list in 2015, but was transplanted at twice the rate of non-HCC indications(1). Patients with HCC are selected for the liver transplant waiting list using Stage T2 imaging tumor size criteria: prior to 10/31/2013, these criteria were (a) one lesion equal to or between 2cm and 5cm in size, or (b) two or three lesions less than 3cm in size.

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**Disclosures:** The authors have no relevant conflicts of interest to disclose.

Many elements of data submitted to UNOS by transplant centers are subject to review. Center data are audited for completeness and outcomes are compared to model projections(2). While tumor size data could be verified with an independent blinded audit, there is no process currently in place. For a patient with HCC, the stakes are high: a tumor measurement variation of 0.1cm may mean the difference between potentially curative transplant and exclusion from the waiting list. Forensic accountants, forensic auditors, economists, and scientists have long used the patterns of the digits (for example, Benford's Law) in numerical data to detect various anomalies (3). In contrast, a comparison of observed number patterns to an expectation has not yet been done in a clinical setting.

In this study, we apply forensic accounting methods to tumor sizes of patients with HCC on the liver transplant waiting list, and use a Poisson regression model to evaluate the effect of reporting bias on HCC recurrence. We hypothesize that HCC tumors falling just outside the size criteria may be inappropriately adjusted to fall within the size criteria. For example, a tumor slightly smaller than 2cm in size could be rounded upwards into the 2cm range, and a tumor slightly >5cm might be rounded downwards into the 5cm range. This could compromise the equity of organ distribution.

## METHODS

### Study Subjects

The UNOS/STAR liver transplant waitlist database (September 2014 data release) was queried for adult patients first listed for transplants with HCC exception points and with an HCC diagnosis meeting the UNOS 3.6.4.4 criteria (stage T2 disease), prior to the implementation of the 1cm floor. Tumors were analyzed separately by the size criteria applicable to their category (single tumor 2–5cm in size, or 2–3 tumors <3cm in size). Patient demographics were described using means and proportions.

### Tumor size analysis: Single tumor 2–5cm in size

The tumor sizes were summarized in a histogram. TableCurve 2D (Systat Software, UK) was used to fit a variety of distributions to the histogram of tumor sizes. The observed tumor counts were compared to expected values from the Logistic Power Peak distribution, which was the best-fitting distribution with the highest  $r^2$  value (0.926) that could logically be related to tumor measurements.

We then checked whether the 2.0cm spike above the expected value on the histogram was consistent across the various transplant centers. A ratio of the count of 2.0cm tumors to the average count of the 2.1cm and 2.2cm tumors (“2cm margin ratio”) was calculated for each center and was compared to the sample average using an adaptation of the Fleiss test for a significant difference between two proportions (3). The effect of the center size (number listed) was investigated by calculating a rank correlation between the center's  $N$  and the 2.0cm margin ratio.

The 5.0cm margin was investigated using similar methods, with the “5.0cm margin ratio” defined as the count of the 5.0cm tumors divided by the average count of the 4.8cm and 4.9cm tumors. Finally, we evaluated the tumor size distributions of the ten largest centers

combined, defined by the number of patients with HCC wait-listed during the study period, and compared them to the combined results of all the other centers with at least 20 records. Centers with less than 20 records were not included in this analysis because many had zeros at the margin, which precluded calculation of a meaningful ratio. The correlation between the 5.0 cm margin ratio and the center size could not be calculated because many centers (including some with greater than 100 records) had zero records with measurements of 4.8 or 4.9 cm.

### **Tumor size analysis: 2–3 tumors <3cm in size**

Records for patients with multiple tumors were investigated in a manner similar to what is described above. Tumors were ordered in size from largest to smallest within each record. The best-fitting function for the largest tumor was a 5-parameter Beta Distribution with an  $r^2$  of 0.938; for the second tumor, a logistic power peak curve with an  $r^2$  of 0.930; for the third tumor, a logistic power peak curve with an  $r^2$  of 0.908.

### **Rounded numbers**

Round numbers, defined as “numbers that can be divided by 100 without leaving a remainder,” have previously been used by Nigrini in forensic accounting applications to find invented numbers (4).

As a result of observing the tumor size spikes at multiples of 0.5cm, we adapted this approach to define round numbers as numbers that can be divided by 0.5 without leaving a remainder. The binomial distribution was used to calculate the expected proportion of patients with multiple tumors who had “round” tumor measurements. These expectations are calculated in the same manner as calculating the chances of 0, 1, 2, or 3 heads with two or three coin tosses, except that in this case heads (a tumor with a round number measurement) has an expected probability of  $1/5 = 0.20$ . Since every fifth millimeter is a number in cm that is a multiple of 0.5, the unbiased expected probability of tumor sizes in multiples of 0.5cm is 0.20. For patients with two tumors, the expectations for 0, 1, and 2 round numbers are 0.64, 0.32, and 0.04 respectively. The expectations for 0, 1, 2, and 3 round numbers for patients with three tumors are 0.512, 0.384, 0.096, and 0.008 respectively. A two-sided binomial test of proportions compared expected to observed proportions of patients with “round” tumor measurements.

### **HCC recurrence**

HCC recurrence was defined as a diagnosis of recurrence or HCC-related death. Free-text cause of death fields were manually reviewed and determined to be HCC recurrence, HCC-related death, or non-HCC related death by the senior author (JPR). We used a Poisson model to predict the expected number of HCC recurrences by tumor size, with patient as the unit of analysis. Varying follow-up time from transplant to recurrence, death, or last follow-up was accounted for in the model as the offset. The models were adjusted for variables previously shown to be associated with HCC recurrence: AFP greater than 500ng/mL, waiting time greater than 6 months, history of local-regional therapy, and tumor size (5). The ratio of observed to expected (O/E) HCC recurrences for each tumor size was estimated using the best linear unbiased prediction of its random effect. There were an insufficient

number of recurrences by tumor size among patients with two or three tumors to support the multivariable model. Additional modeling details may be found in the Technical Appendix. Poisson regression modeling was completed with STATA/IC 11 (College Station, TX).

This study was approved by our center's committee on human research.

## RESULTS

Between January 1, 2011 and October 31, 2013, 12,958 patients were placed on the liver transplant waitlist with a diagnosis of HCC. Most patients were male (77%), white (66%), and had liver disease due to hepatitis C virus (61%) (Table 1). Of those listed, 9,168 (70%) received exception points for a single tumor, with a median tumor size of 2.3cm (IQR 2.0–3.0).

### Tumor size patterns, single tumor 2–5cm

The histogram of actual tumor sizes for all centers (Figure 1a) demonstrates an irregular logarithmically decreasing pattern with visible spikes at multiples of 0.5 and the largest spikes at 2.0cm and 3.0cm. The difference between the observed number of patients (745) and the fitted function value at 2.0cm is 238.3, amounting to 2.7% of the waiting list population with a single tumor. At the upper limit of 5.0 cm, the difference between the observed number of patients and fitted function value is 65.7, or 0.7% of the waiting list.

### 2.0cm margin ratio, by centers

There were 117 centers included in the study; the ten largest centers accounted for 3,136 of the patients on the waitlist (24.2%). The average 2.0cm margin ratio was 1.58, defined as a ratio of the count of 2.0cm tumors to the average count of the 2.1cm and 2.2cm tumors across all centers. Smaller centers were more likely to have an excess of 2.0cm measurements (correlation of decreasing center size and increasing 2.0cm margin ratio was  $-0.194$ ,  $p=0.05$ , for centers with at least 20 records).

### 5.0 margin ratio, by centers

The average 5.0cm margin ratio among all centers was 1.26. The weighted average 5.0cm margin ratio for the ten largest centers was 0.96 (range 0–3.0). Three centers had 5.0cm margin ratios that were significantly different from the mean with  $p<0.1$ , in each case because the 5.0cm counts were zero. The weighted average for the remaining smaller centers was 1.38.

### Patients with 2–3 tumors

The tumor size distribution for the largest tumor for patients with 2–3 tumors  $<3$ cm in size ( $N=3,790$ ) is shown in Figure 2a. There was an observed excess of 110 patients at 2.0 cm compared to the expected value, and an observed deficit of 110 patients among 1.9, 2.1, and 2.2 cm measurements when compared to the fitted function. There was also an observed excess of 96 patients at 2.8 and 2.9cm.

The tumor size distribution for the second largest tumor for patients with 2–3 tumors <3cm in size (N=3,790) is shown in Figure 2b. The tumor size distribution for the third largest tumor for patients with 2–3 tumors <3cm in size (N=1,042) is shown in Figure 2c. There is an excess of 1.0cm measurements compared to the fitted function.

### Rounded Numbers

In patients with one tumor, 0.33 of tumor measurements were at increments of 0.5, compared to  $7/31 = 0.23$  expected by chance ( $p < 0.001$ ). Observed proportions of round numbers and expected values for patients with multiple tumors are shown in Figure 3: there were fewer patients with zero round numbers than expected. While a “full house” of round numbers is expected to occur 0.04 and 0.008 of the time for patients with 2 and 3 tumors respectively, the observed proportions were higher than expected.

### HCC recurrence, single tumor 2–5 cm

A total of 6,049 patients were followed for a median of 2.4 years (IQR 1.0–4.7) after liver transplantation. 435 (7.2%) patients experienced HCC recurrence a median of 14 months after transplantation (IQR 7 months – 2.4 years); an additional 981 (16.2%) patients died a median of 14 months after transplantation (IQR 4 months – 2.6 years). Observed/expected ratios of HCC recurrence by tumor size from the multivariable Poisson model (adjusted for AFP > 500ng/mL, waiting time greater than 6 months, and history of local-regional therapy) ranged from 0.57 – 1.37. Only 2.0cm tumors had an adjusted O/E ratio statistically significantly different from 1 (ratio 0.73, 95% CI 0.57–0.94) (Figure 4). This suggests that patients listed with 2.0cm tumors had a smaller than expected chance of HCC recurrence, potentially as a result of inaccurate tumor size reporting described above.

## DISCUSSION

The fairness of a liver transplant allocation policy for hepatocellular carcinoma is predicated on the accurate reporting of patient’s tumor measurements. Because small changes in tumor size may mean the difference between potentially curative transplant and exclusion from the waiting list, providers may be inaccurately reporting measurements of tumors at the margins of size criteria. We demonstrate that up to 3.5% of the LT waitlist population with a single tumor may have tumors falling outside size criteria, and are potentially inappropriately listed. We suggest that adaptations of the forensic accounting methods used to find biases and other anomalies in micro and macro-level organizational data may be used by transplant centers to assess the accuracy and validity of their reported data, and also in other clinical settings where a high level of accuracy is critical. As inaccurate data entry into a Federal system potentially represents a criminal offense, there is sufficient motivation for the center and the OPTN to monitor for bias.

The tumor size policy is similar to the taxation concept of a notch, where a change in income (usually an increase) triggers a discrete change (usually a decrease) in, for example, the value of a taxpayer’s credit (6). These tax notches trigger behavioral responses by the taxpayer, such as self-employed taxpayers making sure that their reported income is below the thresholds for the Savers Credit.(7) Other notches occur, for example, where donation-

dependent organizations award to their donors various sponsorship levels, or where car salesmen get bonuses for exceeding a sales target. Here the general behavioral response is that donations and car sales cluster at the low side of the reward brackets. Researchers have also investigated notch-related consumer behavior in financial institutions and the housing market (8,9). The observed excess of tumor measurements at the 2.0 and 5.0cm margins is evidence of similar behavior in HCC tumor size reporting.

While our analysis shows a significant rounding of tumor sizes, it cannot establish the source of this error or its intent: tumor size rounding may be intentional or unintentional during study interpretation, or perhaps intentional or unintentional during reporting to UNOS. The excess at 2.0cm may also be in part due to intensive serial monitoring of lesions just under size criteria with listing as soon as the threshold is reached. The 2010 AASLD guidelines (10) recommend intensive monitoring of single lesions under the 1.0cm diagnostic threshold for HCC. This practice may carry over to the threshold for transplant exception points, though we do not expect this to result in lower than expected recurrence rate post-transplant. Furthermore, about 1 percent of the tumor sizes were measured to two decimal places. The inconsistency in the decimals suggests that a uniform recording standard should be developed and then followed. Regardless of the reasons for the rounding and decimal inconsistencies, inaccurate tumor size reporting compromises the equity of liver transplant distribution. Our data suggest that inappropriate rounding of small tumors up to 2.0cm may contribute to the lower-than-expected HCC recurrence found at the 2.0cm tumor margin.

We acknowledge several limitations to this study. The curves fitted to tumor size histograms are not biologically motivated, but are the best available expectation lacking a comprehensive registry of all diagnosed HCC tumors. We anticipate that imperfect model fit would decrease the observed size of outlier effects, as outliers were not excluded during model fitting, and therefore under-estimate the observed deviations. The diagnostic standard for HCC imaging is demonstrably less sensitive for tumors <2cm in size (11), which may explain the relative scarcity of small tumors in our analysis. The scarcity of small tumors did not allow us to analyze reporting patterns in this group of patients. We restricted our sample to imaging obtained prior to the institution of LI-RADS criteria to reduce heterogeneity of the cohort; the accuracy of measurements and the associated accuracy of reported values may be improving over time with the increased implementation of digital measurement software and more stringent diagnostic criteria.

Inter-reader variability in tumor size measurements has been evaluated in liver(12)(13), lung(14), and otherwise classified abdominal/thoracic(15) nodules. Inter-reader variability tends to decrease with level of training and lesion size, and may account for a difference of 6–12% for lesions < 1.0cm, and 4–6% for lesions 2.0cm or larger(12). While we acknowledge that a difference of 1 or 2mm may reasonably be attributed to measurement error, we would not expect these measurement errors to cluster preferentially at the margins of transplant eligibility as demonstrated by this analysis. Finally, the small number of observations at larger tumor sizes precluded our finding a significant effect at the 5.0cm margin.

In this study, we describe a novel application of forensic accounting methods to HCC tumor size reporting on the liver transplant waiting list, finding likely misreporting at the margins of transplant eligibility and a possible effect on post-transplant outcome. In clinical practice at transplant centers, studies done at outside institutions are transmitted to the transplant centers and then re-read as required by OPTN policy 9.3.F.iii. Further information may be gleaned from comparing tumor sizes reported from transplant center imaging to sizes reported for the original studies at outside institutions, as the outside institutions may not have the same incentives for tumor size reporting. In the absence of an auditing process, we suggest that further investigation of tumor reporting patterns is necessary to enforce the accurate measurement and reporting of HCC tumor sizes in the interest of equitable liver transplant distribution.

## Supplementary Material

Refer to Web version on PubMed Central for supplementary material.

## Acknowledgments

**Financial Support:** This work was supported by the UCSF Liver Center (P30 DK026743). This work was supported by the National Center for Advancing Translational Sciences, National Institutes of Health, through UCSF-CTSI Grant Number TL1 TR000144. Its contents are solely the responsibility of the authors and do not necessarily represent the official views of the NIH.

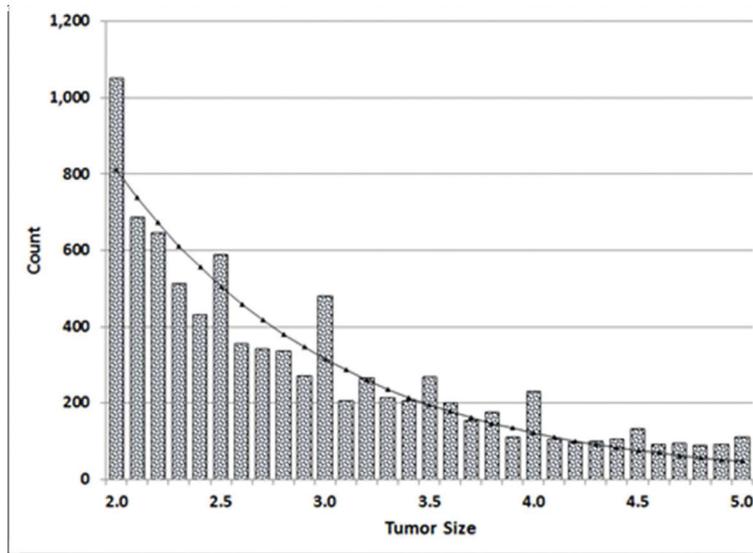
## Abbreviations

<b>HCC</b>	hepatocellular carcinoma
<b>UNOS/STAR</b>	United Network for Organ Sharing/Standard Transplant Analysis and Research
<b>O:E</b>	Observed to Expected
<b>AFP</b>	alpha feto-protein
<b>IQR</b>	inter-quartile range
<b>LT</b>	liver transplant
<b>OPTN</b>	Organ Procurement and Transplantation Network
<b>LI-RADS</b>	Liver Imaging Reporting and Data System

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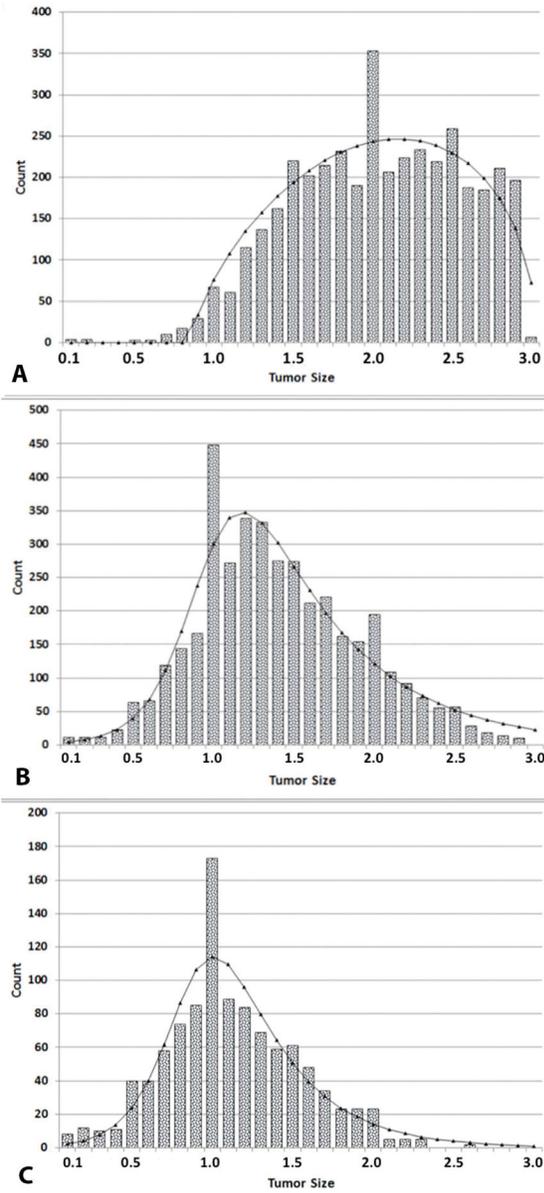
**Figure 1.** Distribution of the tumor sizes (cm) for patients with a single tumor, with fitted Logistic Power Peak distribution (n=9,168).

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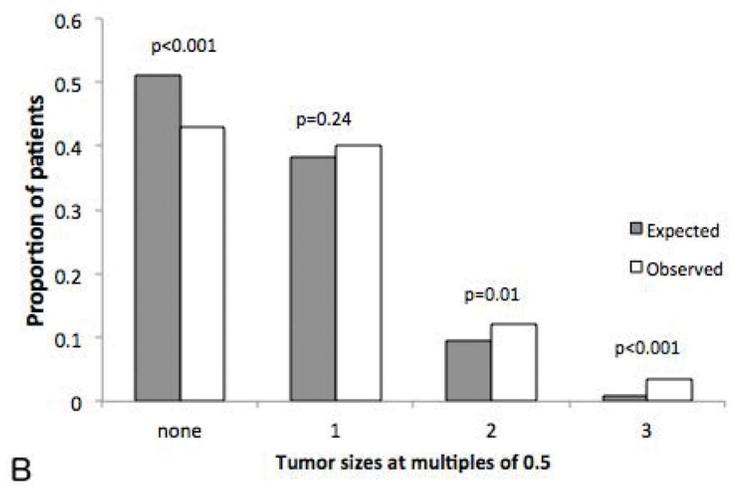
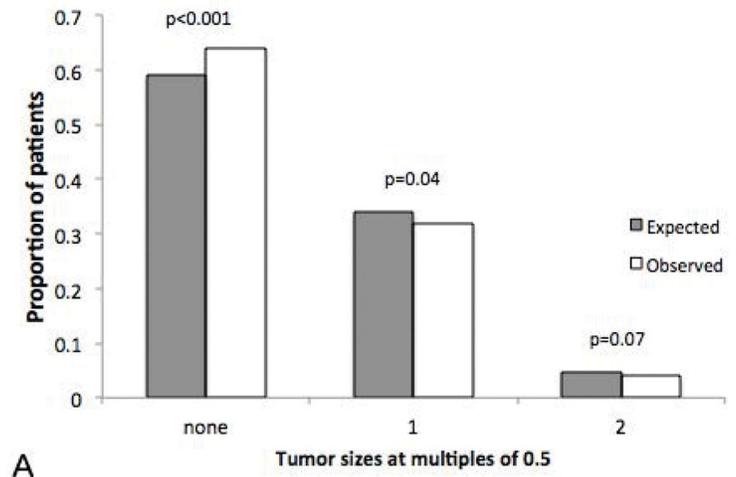
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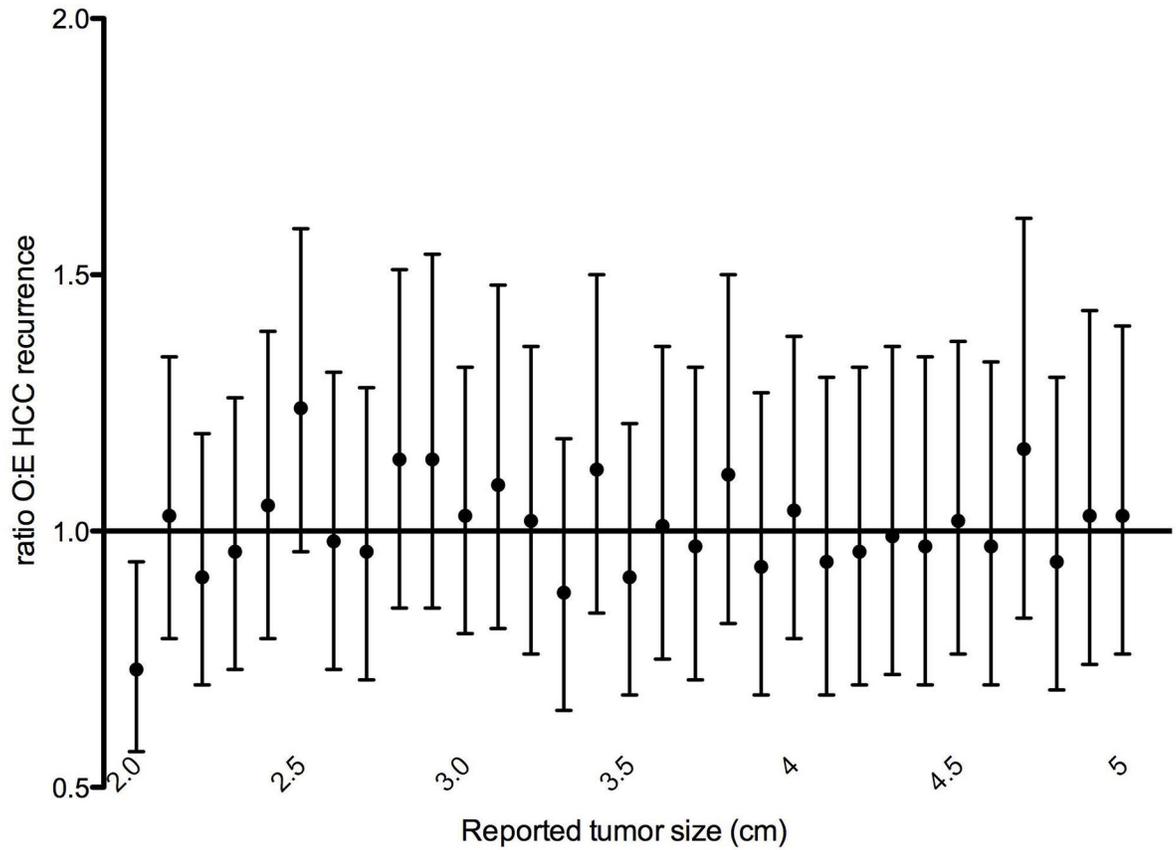
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**Figure 2.** Distribution of tumor sizes (cm) for patients with two or three tumors together with fitted distributions, (a) first and largest tumor, n=3,790, (b) second tumor, n=3,790 (c) third tumor, n=1,270.



**Figure 3.** Expected proportions of rounded (multiples of 0.5) measurements compared to observed proportions, for (a) patients with two tumors, n=2,520 (b) patients with three tumors, n=1,270.



**Figure 4.** Ratios for observed:expected HCC recurrence for patients with single tumors derived from multivariable Poisson model adjusted for AFP > 500ng/mL, waiting time greater than 6 months, and history of local-regional therapy, sorted by tumor size. (n=6,049).

**Table 1**Descriptive statistics of the liver transplant waiting list cohort with HCC,  $N=12,958$ .

Characteristic		N (%)	Single tumorN=9,168	Multiple tumorsN=3,790
Sex	F	3028 (23.4)	2203 (24.0)	825 (21.8)
	M	9930 (76.6)	6965 (76.0)	2647 (78.7)
Ethnicity	White	8524 (65.8)	6047 (66.0)	2477 (65.4)
	Black	1221 (9.4)	855 (9.3)	366 (9.7)
	Hispanic/Latino	1959 (15.1)	1379 (15.0)	580 (15.3)
	Asian	1088 (8.4)	774 (8.4)	314 (8.3)
	Other	166 (1.3)	113 (1.3)	53 (1.4)
	ABO blood type	A	4854 (37.5)	3444 (37.6)
	AB	461 (3.6)	322 (3.5)	139 (3.7)
	B	1597 (12.3)	1107 (12.1)	490 (12.9)
	O	6046 (46.7)	4295 (46.9)	1751 (46.2)
Body Mass Index	<25	2205 (23.9)	1502 (23.0)	703 (26.2)
	25–29.9	3659 (39.7)	2529 (38.7)	1130 (42.2)
	30–34.9	2208 (24.0)	1619 (24.8)	589 (22.0)
	35–39.9	903 (9.8)	707 (10.8)	196 (7.3)
	≥40	246 (2.7)	185 (2.8)	61 (2.3)
Liver disease etiology	HCV	7913 (61.1)	5592 (61.0)	2321 (61.2)
	HBV	673 (5.2)	488 (5.3)	185 (4.9)
	Alcoholic cirrhosis	1112 (8.6)	739 (8.1)	373 (9.8)
	Non-alcoholic steatohepatitis	716 (5.5)	532 (5.8)	184 (4.9)
	Non-cholestatic cirrhosis	661 (5.1)	463 (5.1)	198 (5.2)
	Other	1,882 (14.5)	1354 (14.8)	528 (13.9)