Guidance -
Data Monitoring Committees

FDA March 2006 "Guidance for Clinical Trial Sponsors"

What is a Data Monitoring Committee (DMC) and when is one needed?

"A clinical trial DMC is a group of individuals with pertinent expertise that reviews on a regular basis accumulating data from one or more ongoing clinical trials."
(DMCs are also known as Data Safety Monitoring Boards (DSMBs) or Committees (DSMCs).)
A Data Monitoring *Plan*, if appropriate, might contain a description of a Data Monitoring *Committee*.

Determining need for a DMC: *(excerpts from FDA March 2006 guidance)*

- Current FDA regulations...impose no requirements for the use of DMCs in trials except under FDA 21 CFR 50.24(a)(7)(iv) in research studies in emergency settings in which the informed consent requirement is excepted.
- DMCs are generally recommended for any controlled trial of any size that will compare rates of mortality or major morbidity, but a DMC is not required or recommended for most clinical studies.
- DMCs have not commonly been established for short-term studies of interventions to relieve symptoms. Such a group is probably warranted only when termination of the trial for efficacy...would be indicated for ethical reasons.
- DMCs are not usually warranted in early studies such as Phase 1 or early Phase 2 studies, or pilot/feasibility studies, but formal monitoring groups may be useful for certain types of early clinical studies.....a DMC overseeing safety may be considered when risk to participants appears unusually high,...the need for independent DMCs in early phase studies will be infrequent.

Factors to consider:

Risk	A fundamental reason to establish a DMC is to enhance the safety of trial participants in which Safety concerns may be unusually high.
Practicality	If the trial is likely to be completed quickly, the DMC may not have the opportunity to have a meaningful impact.
Scientific Validity	A third consideration...is whether a DMC can help assure scientific validity

IRBs and the DMC *(excerpts from FDA March 2006 guidance)*

- ...an IRB may appropriately inquire as to whether a DMC has been established, and, if so, seek information about its scope and composition.
- Given its obligation to minimize the risk to patients, an IRB may take action based on...recommendations from a DMC to the sponsor.

Composition and Independence of DMCs *(excerpts from FDA March 2006 guidance)*

- …the establishment of such committees was based on the recognition that...individuals closely involved with the design and conduct of a trial may not be able to be fully objective...

- The sponsor and/or trial steering committee generally appoint members of a DMC. Factors to consider...typically include relevant expertise, experience...and absence of serious conflicts of interest...
- Independence is greatest when members have no financial or other important connections to the sponsor *(other than their compensation for serving on the DMC)...
- A DMC may have as few as 3 members,...
- ...recommend that DMC members for a given trial not include investigators in that trial.
- ...avoid appointing to a DMC any individuals who have relationships with trial investigators or sponsor employees that could be considered reasonably likely to affect their objectivity.
- To(o) narrowly defining "independence" may result in eliminating from consideration the most knowledgeable researchers,...

Note: The FDA **does NOT** see compensation for serving on the DMC as compromising independence

DMC Charter

DMCs typically operate under a written charter describing standard operating procedures. As described in this FDA guidance, the charters could/should include the details about meeting frequency, what gets reported to the DMC, statistical methods, what is monitored, and how, etc.