

CTN-POL-018	DATA SAFETY MONITORING BOARD POLICY	Date Approved: Dec 2000
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Rationale

The NIDA Clinical Trials Network is a National Cooperative established by NIDA to conduct multi center clinical trials of treatments for addictive disorders. Studies are conducted under the auspices of one or more of the collaborating centers. Because of the design of the Clinical Trials Network, no IRB and no single participating investigator will see all of the safety and efficacy data emerging from trials conducted by the Network. An independent data safety monitoring board is being established to assure that all participating research institutions have access to timely safety data reflecting the entire CTN experience.

Regulatory and Policy Considerations

Data and Safety Monitoring Boards (DSMBs) are currently required for all multicenter interventional studies sponsored by NIH. The responsibility for establishing a monitoring program appropriate to the level of risk rests with the sponsoring Institute. The principles governing organization of these Boards are described in FDA consolidated GCP guidance document (ICH E6) which requires that such boards have an established Standard Operating Procedure (SOP) and ICH E9 which describes appropriate administrative and statistical analysis procedures relating to interim analysis of study data required for the DSMB to fulfill its responsibilities. This document responds to these regulatory and policy considerations intended to ensure that:

- There is independent and expert monitoring of CTN studies
- There are safeguards to protect the confidentiality of interim data
- Interim analyses are conducted in accordance with accepted statistical principles
- Required safety information is made available to NIDA, IRBs and investigators for the protection of human subjects

Responsibilities

- The NIDA Clinical Trials Network DSMB is responsible for conducting periodic review of accumulating safety and efficacy data from all clinical trials conducted by the Network. The DSMB also reviews all proposed amendments to the study protocol. For each trial conducted by the Network, the DSMB reviews data independently from the study sponsor, investigator(s), and IRBs to determine whether the accumulating data support continuing the trial, whether study procedures should be changed or whether the trial should be halted for reasons relating to the safety of the study subjects, the efficacy of the treatment under study or inadequate study performance (e.g., poor recruitment of subjects).

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In conducting its reviews and making recommendations to NIDA regarding the status of ongoing clinical trials, the DSMB works to assure that the safety of study subjects is protected while the scientific goals of the study are being met.

Oversight of DSMB

The DSMB is responsible to the Director of the NIDA Clinical Trials Network for the effective performance of its mission. In fulfilling its mission to assure the safety and integrity of CTN trials, it is essential that the DSMB function in a manner that exhibits a high degree of competence and experience. The DSMB should function independently of other components of the CTN and of career and financial interests of its members.

If NIDA-CTN determines that the functioning of the DSMB is inadequate, it will discuss with the CTN Board of Advisors and the Director of NIDA what changes are required.

Membership of the DSMB

The core DSMB will consist of 7 members. Members will be appointed for a term of 3 years by the Director of NIDA s CTN. For trials involving pharmacotherapy, at least 3 members of the Board will be physicians. At least 1 member of the Board will be a statistician. The Board or NIDA may request the appointment of additional members who can provide the additional expertise required to effectively monitor specific trials. The Board as a whole should have strong experience in the following areas, although not all board members are expected to be experienced in all areas.

Desired Experience of DSMB Members

- Medical management and treatment of drug addictions using both pharmacologic and nonpharmacologic methods.
- Conducting clinical trials for psychiatric or neurobehavioral disorders.
- Clinical pharmacology and toxicology, including neuropsychopharmacology.
- Biostatistical analysis of clinical trial data and knowledge of good clinical trial methodology.
- Knowledge of clinical trial ethics and human subjects protection issues.

Additional Requirements for DSMB Membership

Conflict of Interest

The independence of the DSMB is essential to its mission to protect the safety of subjects in CTN trials and ensure the integrity of the studies. To assure the independence of the

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Board, members of the DSMB may not be currently receiving grants or contracts from NIDA or any organization directly affiliated with the CTN.

In addition, members of the Board who may be currently receiving or who have received grants, contracts or other financial support from firms for the evaluation of treatments for drug addiction or dependence will be asked to disclose the nature of their financial arrangements. Members of the Board will be asked to recuse themselves from participating in the monitoring of studies that evaluate products from which they have or have had financial support. They will also be asked to recuse themselves from monitoring of studies that evaluate products that NIDA determines are potential competitors of the products being evaluated. It is not expected that every member of the DSMB will be eligible to monitor all studies conducted during their term of appointment.

Confidentiality

In order to assure the integrity of CTN studies, DSMB members must agree to respect the confidentiality of the data they are asked to review. Members of the DSMB will be asked to sign a statement of confidentiality confirming their agreement not to disclose data other than under the terms of this document.

Monitoring Activities

The Board will review information on the safety of all studies conducted by the CTN. Data concerning efficacy (outcome measures) will be reviewed in accordance with the interim analysis plan in any protocol when such a plan has been provided in a study protocol. When an interim analysis plan is not provided, the DSMB will review efficacy data in accordance with its established procedures.