

1. BACKGROUND:

The Dana-Farber/Harvard Cancer Center's (DF/HCC) Data and Safety Monitoring Committee (DSMC) is charged with providing ongoing monitoring for high-risk Pilot, Phase I and Phase II clinical trials initiated and conducted by DF/HCC investigators. The primary purpose of the committee is to ensure the safety of study participants as well as evaluate the overall progress of the trial.

2. ASSOCIATED DF/HCC POLICIES:

- 2.1. [COM-100](#)
- 2.2. [DATA-100](#)

3. PROCEDURE:

3.1. Protocols Requiring Monitoring:

3.1.1. The Scientific Review Committees (SRC and PSRC), Institutional Review Board (IRB) and/or the Clinical Investigations Leadership Committee (CLC) will identify high-risk DF/HCC initiated protocols.

3.1.1.1. High Risk protocols include, but are not limited to:

- DF/HCC investigator-sponsored interventional trials, DF/HCC multi-center trials, DF/HCC held IND/IDE trials
- First in human and/or pediatric clinical trials that do not have an established DSMC
- Gene transfer protocols that do not have an established DSMC
- Vaccine trials using live or attenuated viruses that do not have an established DSMC
- Other unusually complex or intensive protocols requiring a DSMC as determined by the SRC, PSRC, IRB and/or CLC

3.1.1. High-risk externally sponsored trials must have a designated DSMC or appropriate Data and Safety Monitoring plan in place. The DFCI IRB may require additional documentation from external sponsors to ensure the oversight is appropriate. The DF/HCC DSMC will not act as the oversight committee for trials under a non-DF/HCC regulatory sponsor. However, if directed by the SRC, IRB and/or CLC, the DF/HCC DSMC may monitor the local conduct *only* for high-risk externally-sponsored protocols.

3.2. Protocol Review Procedures:

3.2.1. The DSMC meets monthly to review toxicity, data submission compliance and accrual. Protocols are typically reviewed every 3, 6 or 9 months based on the protocol status, accrual rate, and review

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of ongoing safety indicators.

- 3.2.2. ODQ notifies the sponsor-investigator and designated sponsor personnel of the next upcoming DSMC review for a given protocol. Notifications are typically sent 4-6 weeks prior to the scheduled review date.
- 3.2.3. The sponsor-investigator, or designee, will submit the following to ODQ to facilitate review by the DSMC:
- Completed [DSMC Monitoring Form](#)
 - DSMC Data and Missing Forms Report
 - Multi-Center Progress Report (attached to DSMC Monitoring Form, for investigator-sponsored, multi-center trials only)
- 3.2.4. In addition, ODQ will prepare the following information to facilitate review by the DSMC:
- Protocol Summary and Registration Report
 - OHSR Summary Report
- 3.2.5. The sponsor-investigator is responsible for data compliance of all participating sites both within and outside DF/HCC for investigator-sponsored research. The DF/HCC DSMC has the prerogative to review data submission compliance at any time, regardless of the next scheduled review.
- 3.2.5.1. The DSMC defines data submission compliance as less than or equal to 10% of total forms missing for both overall protocol compliance and site-specific compliance. Toxicity reporting, as a sub-category of missing forms, will also be held to the less than or equal to 10% threshold for site-specific compliance.
- 3.2.5.2. In the event the percentage of total missing forms or site-specific toxicity forms is greater than 10%, but the total of number of forms missing is small, the DSMC Chair has the discretion to deem the protocol compliant.
- 3.2.6. When protocols are identified as non-compliant with data submission, the following procedures, dependent on the percentage of missing forms, will be followed.
- 3.2.6.1. If a protocol has > 10% but ≤20% of total forms missing for the overall protocol or toxicity forms missing at any one site:
- 3.2.6.1.1. Notice of percentage of forms missing and a reminder of data submission compliance criteria will be incorporated into the DSMC response memos.
- 3.2.6.1.2. The protocol will be given a 3-month review. At the time of the 3-month review:

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- 3.2.6.1.2.1.If the protocol data are compliant, the protocol will be assigned its next review date based on DSMC recommendation of the safety review.
- 3.2.6.1.2.2.If the protocol remains non-compliant, an email memo will be sent no later than the next business day to the sponsor-investigator, designated research team member and applicable clinical trials office defining deadlines for data submission compliance and consequences for failure to comply. Data must be compliant (<10% of total forms missing and <10% of site specific toxicity forms missing) within 2 weeks after the DSMC meeting.
- 3.2.6.2.If the protocol has >20% of total forms missing for the protocol or toxicity forms missing at any one site:
- 3.2.6.2.1. An email memo will be sent no later than the next business day (Monday – Friday) to the sponsor-investigator, designated sponsor personnel, and applicable clinical trials office defining deadlines for data submission compliance and consequences for failure to comply. Data must be compliant (<10% of forms missing) within 2 weeks after the DSMC meeting.
- 3.2.6.3.If a 2-week data compliance deadline is not met, the following actions will be applied:
- 3.2.6.3.1. For protocols open to accrual where the overall % of missing forms is out of compliance, accrual will be suspended at **ALL** sites. On behalf of the DSMC, ODQ will submit a closure to accrual request to the Institutional Review Board (IRB).
- 3.2.6.3.2. For protocols open to accrual where a specific site(s) is out of compliance, accrual will be suspended at the specific site(s). On behalf of the DSMC, ODQ will submit a closure to accrual request to the Institutional Review Board (IRB).
- 3.2.6.3.3. For protocols already closed to accrual, the ODQ DSMC coordinator will send a memo to the Director of the Office for Human Research Studies (OHRS) recommending suspension of activity on any pending protocols of the sponsor-investigator.
- 3.2.6.4.No data analysis, abstract or publication may take place while a protocol is out of data compliance.
- 3.2.6.5.The DSMC Chair has the discretion to adjust the timeframes listed above.

3.3. Committee Membership and Meeting Logistics

- 3.3.1. Committee members are appointed by the Senior VP for Research and will include at a minimum:

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Voting Members:

- [3] Medical Oncologists (including the committee Chair)
- [1] ad hoc Physician as needed (Radiation Oncologist, Surgeon, etc)
- [1] Biostatistician
- [1] Nurse
- [1] Pharmacist

Non-voting Member:

- [1] Meeting Coordinator

3.3.2. ODQ will maintain DSMC meeting minutes and correspondence. DSMC recommendations made to study teams and reported to the IRB and the Clinical Investigations Leadership Committee (CLC). A summary of all DSMC activity is reviewed by CLC monthly.

3.3.3. All trial and participant information will remain confidential. All DSMC members are required to sign a Confidentiality and Conflict of Interest (COI) Statement related to the trials discussed. Members will recuse themselves from the discussion and voting if a conflict exists for a given protocol.