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Independent Academic Data Monitoring Committees for Clinical Trials in Cardiovascular

2 and Cardiometabolic Diseases

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46 Abstract

47 Data monitoring committees (DMCs) play a crucial role in the conduct of clinical trials to ensure 48 the safety of study participants and to maintain a trial's scientific integrity. Generally accepted 49 standards exist for DMC composition and operational conduct. However, some relevant issues 50 are not specifically addressed in current guidance documents, resulting in uncertainties regarding 51 optimal approaches for communication between the DMC, steering committee, and sponsors, 52 release of information, and liability protection for DMC members. The Heart Failure 53 Association (HFA) of the European Society of Cardiology (ESC), in collaboration with the 54 Clinical Trials Unit of the European Heart Agency (EHA) of the ESC convened a meeting of 55 international experts in DMCs for cardiovascular and cardiometabolic clinical trials to identify 56 specific issues and develop steps to resolve challenges faced by DMCs. The main 57 recommendations from the meeting relate to methodological consistency, independence, 58 managing conflicts of interest, liability protection, and training of future DMC members. This 59 paper summarizes the key outcomes from this expert meeting, and describes the core set of 60 activities that might be further developed and ultimately implemented by the ESC, HFA, and 61 other interested ESC constituent bodies. The HFA will continue to work with stakeholders in 62 cardiovascular and cardiometabolic clinical research to promote these goals.

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Keywords: clinical trials; data monitoring committees; data safety monitoring board; clinical
trials as topic; cardiovascular diseases

67 INTRODUCTION

68 Data monitoring committees (DMCs) play a key role in the conduct of clinical trials. 69 Their primary obligation is to ensure the safety of study participants while maintaining trial integrity.¹ DMCs achieve these functions primarily through reviewing interim safety and 70 71 efficacy data, which assess the likelihood of harm, efficacy, or futility and the balance of risk 72 versus benefit, supplemented by existing knowledge and evidence external to the trial. Pre-73 defined statistical guidelines serve as a construct for decision-making, but DMCs may 74 legitimately take action outside of these guidelines if the data are sufficiently compelling to do 75 so.

76 DMCs are required by regulatory authorities for some, but not all studies. Studies 77 requiring a DMC are typically large, later phase (usually phase 3), randomized, multi-center 78 trials that evaluate mortality or major morbidity outcomes. Early phase or feasibility trials may 79 also warrant a DMC if there is a potential for significant risks to subjects, or for complex, novel 80 therapies where little may be known about the array of potential responses to the study agent.^{2;3} 81 DMCs assembled for earlier phase studies may be responsible for multiple studies and often 82 continue through phase 3, or DMCs may be set up program-wide for more than one study in 83 parallel, to achieve continuity and maximize the DMC's experience with the therapy, which may 84 be particularly important for novel regimens.

Generally accepted standards exist for DMC composition and operational conduct.²⁻⁵
Often, some relevant issues are not specifically addressed in current guidance documents or
DMC charters, such as the communication structure between the DMC, steering committee, and
sponsors (specifically when DMC recommendations are not followed), release of information,
and liability protection for DMC members.

90 The Heart Failure Association (HFA) of the European Society of Cardiology (ESC), in 91 collaboration with the Clinical Trials Unit of the European Heart Agency (EHA) within ESC 92 recognized that independent, qualified, and experienced DMCs are an important vehicle for 93 protecting the integrity of cardiovascular clinical trials, and these areas of uncertainty warranted 94 discussion in an open forum. A meeting of international experts in DMCs for cardiovascular and 95 cardiometabolic clinical trials was organized in 2015 and supported by the HFA to identify 96 specific issues and advise steps to resolve challenges faced by DMCs. These societies 97 acknowledge that identifying experienced individuals without significant conflicts of interest (i.e. 98 potential for themselves or close personal connections to substantially benefit financially, 99 professionally, or intellectually from the trial results) who are willing to participate on a DMC 100 can be challenging. Finally, formal approaches are lacking to cultivate a greater number of 101 appropriately experienced individuals to serve on DMCs, and the participants sought to use this 102 forum to explore training approaches for future DMC leaders and members. This paper 103 summarizes the key outcomes from this expert meeting.

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105 OVERVIEW OF THE ROLE OF THE DATA MONITORING COMMITTEE

DMCs are primarily in place to ensure that patient safety is not compromised in an ongoing trial, and these committees consider safety from several perspectives. The most straightforward aspect is monitoring for emergence of serious or unexpected adverse events or toxicities and stopping a trial for evidence of harm. For less severe safety signals, the DMC may convey relevant information to the steering committee or study sponsor that triggers a protocol amendment, increased surveillance, or additional training in studies that involve devices or procedures. More complex considerations include stopping a trial early when there is

113 overwhelming evidence (i.e., beyond a reasonable doubt and statistically supported) of a 114 mortality benefit, such that the trial can be brought to rapid completion to expedite the 115 availability of an effective therapy to the broader patient population, and to protect 116 placebo/control group and future patients from the risk of delayed access to treatment. However, 117 stopping early for benefit must be balanced against the risk of stopping too early on a "random 118 high" such that the results, once released, are misleading, uninterpretable, or insufficiently 119 convincing to obtain regulatory approval/marketing authorization, change clinical practice, or satisfy payers.⁶⁻¹¹ A trial stopped inappropriately early also faces the ethical problem of wasting 120 121 the contributions of study participants if the data are ultimately not informative. DMCs are also 122 charged with protecting subjects from assuming unnecessary risks of clinical trial participation 123 when a study appears to be futile (i.e., no chance for participating patients to benefit). Both 124 industry and publicly funded trials may consider futility analysis to avoid wasting limited 125 resources. However, declaring futility also assumes risks, such as the potential for missing a 126 delayed treatment effect, an effect on important secondary endpoints, or definitive evidence of 127 neutrality which is important information especially for marketed products (Table 1).

128 DMCs may also provide recommendations for clinical trial operations to the extent that it 129 impacts the DMCs ability to effectively monitor safety (e.g., timeliness of adjudication and 130 obtaining source documentation, interim data, or event reporting) or if study integrity is at risk 131 (e.g., minimizing missing data or dropouts, avoiding excessive regional variation in application 132 of guideline-directed medical therapy). DMCs are becoming more pro-active in recognizing 133 problems that may impact study integrity as they are occurring in real-time. For example, the 134 DMC in the Treatment of Preserved Cardiac Function Heart Failure with an Aldosterone 135 Antagonist Trial [TOPCAT] reviewed characteristics and event rates of enrolled patients and

136 made recommendations for subsequent enrollment as well as substudies to assess heart failure 137 severity during the trial¹². DMCs can also be responsible for other functions, such as 138 recommending protocol adjustments for sample size or dose selection based on accrued data for 139 studies with adaptive designs (i.e., where the study design can be modified at planned interim analyses, controlling for type I error^{13;14}) according to a valid, pre-specified plan.¹⁵ 140 141 The DMC charter should include the responsibilities of the DMC, its structure, format for 142 reports, statistical guidelines for recommending trial termination, contractual and 143 indemnification information, processes for conducting open meetings (may include sponsor, 144 steering committee, study personnel to facilitate sharing information relevant to study progress 145 but interim data are not discussed) and closed sessions (limited to DMC members and the data 146 center statistician since interim data are discussed), procedures to ensure confidentiality, and communication pathways.^{4;16;17} Although charter templates have been proposed,¹⁶ none have 147 148 been uniformly adopted.

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150 IMPORTANCE OF AN INDEPENDENT DATA MONITORING COMMITTEE

Independence is an attribute that is necessary for the DMC to perform its intended function. The DMC must be free to evaluate the data, request analyses, and make recommendations without influence (or the perception of influence) from the sponsor, steering committee, investigators, or other parties involved in the trial. DMC members should have no other involvement with the trial and maintain strict confidentiality with regards to interim data. Relevant financial or intellectual conflicts of interest should be avoided or mitigated.

158 **Conflicts of Interest**

159 Independence as it relates to a DMC can be complex. Steering committee members may 160 propose potential candidates to serve on a DMC to the study sponsor or at a minimum, provide 161 advice to the sponsor regarding the proposed DMC membership. Sponsors may have sole 162 responsibility for choosing DMC members for trials without a steering committee (e.g., some 163 phase 2 trials). It is pertinent to note that the term "sponsor" is a single term but it can describe 164 different entities or roles, depending on the study. The sponsor generally maintains final 165 responsibility for the study, and may be the "owner" of the data and results, but the sponsor is 166 not necessarily the funding source, and the funding source is not necessarily a commercial 167 company. It is important to note that DMCs are in place to protect patient safety and the overall 168 integrity of the trial, which is in the interest of all stakeholders (i.e., patients, investigators, 169 sponsors, clinicians). However, remuneration for DMC services could be perceived as a conflict. 170 Serving on a DMC requires considerable expertise and time commitment; thus, reasonable 171 compensation commensurate with the time commitment and work involved is justified and in accordance with regulatory guidance,³ although no compensation standards are available. 172 173 Involving highly knowledgeable individuals on a DMC is desirable, but these individuals may be more likely than non-experts to have conflicts that need to be managed.¹⁸ Although some 174 175 conflicts may exist, DMC members should not have relationships that would result in significant 176 financial, academic, intellectual, career, professional advancement, or other gains for themselves, their family members, or other close personal relationships based on the trial outcome.¹⁷ 177 178 Potential conflicts should be initially disclosed, and comprehensive reporting at routine intervals 179 (i.e. every 6 to 12 months) should occur throughout the study. Using contract or academic 180 research organizations, professional organizations such as the HFA, or other third parties

181 independent of the sponsor to recommend or select DMC members and handle contracts and 182 payments to DMC members has been proposed as a method to manage conflicts. The structure 183 of the contractual relationship should be transparently provided in legal documents and the 184 "independence" of the third party should also be clearly described. This approach has not yet 185 been systematically implemented,^{4;17} and whether it would promote more efficient management 186 of potential conflicts or create reporting inefficiencies remains to be determined.

187

188 Liability

The issue of liability has been raised as a theoretical concern among DMC members.¹⁷⁻²⁰ 189 190 The lay public and legal personnel are unlikely to appreciate the nuances of interpreting 191 fluctuations in interim data, and they may fail to understand how early data may be misleading.¹⁹ 192 In the context of a litigious society, DMC members may be appropriately concerned that uninformed misinterpretations of safety data could expose them to legal action.²⁰ Although 193 194 actual cases have not yet been reported, many DMC members are concerned about potential 195 legal action taken by patients who feel they have been harmed by participation in a study (and 196 not adequately protected by the DMC), patients enrolled in placebo or standard therapy arms 197 when the therapy tested is ultimately shown to be advantageous (i.e. holding DMC members 198 liable for recommending that a study continue), or investors (e.g., either for allowing a study that 199 was negative to continue or for not stopping a positive study earlier). Sponsors may not provide 200 indemnification of DMC members, a factor which may be a disincentive to DMC participation or 201 unduly influence DMC decision-making.²⁰ Several authors have called for indemnification of 202 DMC members by the study sponsor, which should include support to cover legal counsel for the

DMC member independent from the sponsor's legal counsel to avoid legal conflicts of
 interest.^{4;19;20}

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206 Communication with Steering Committee and Sponsor

207 Processes for communication should be clearly specified in the DMC charter. 208 Opportunities for inadvertent, informal communication between the DMC and other parties 209 involved in the trial should be minimized; for instance, the DMC should avoid sponsor 210 hospitality or advisory boards. Interactions among these groups should be conducted under a principle of maintaining confidentiality of interim results,²¹ since release of interim data could 211 212 bias investigators, study personnel, potential study enrollees, and the general public, and damage 213 the integrity of the trial (e.g., Rosiglitazone Evaluated for Cardiac Outcomes and Regulation of Glycemia in Diabetes [RECORD], Simvastatin and Ezetimibe in Aortic Stenosis [SEAS1).^{22;23} 214 215 The steering committee or sponsor may discuss blinded data with the DMC when appropriate to 216 inform them about the overall study progress, status of endpoint adjudication, or adverse event reporting.²⁴ In the context of adaptive designs, a limited group from the sponsor may interact 217 218 with the DMC and have access to unblinded data, but beyond this purpose the authors strongly 219 view that unblinded data should never be shared with the study sponsor, steering committee, 220 investigators, or other study personnel that are involved with potential protocol changes or whom 221 have contact with investigators, unless the DMC is recommending premature termination, a position that is in agreement with regulatory standards (Figure 1).^{2;3} Even with strict data 222 223 confidentiality procedures in place, release of unblinded interim data for any purpose (e.g., 224 planning of phase 3, regulatory submissions, business purposes) can have detrimental and irrecoverable effects on the integrity of an ongoing trial (e.g., naltrexone/buproprion).²⁵ While 225

representation of government sponsors, including project officers and other administrative staff,
during DMC meetings sometimes occurs,²⁴ the authors of this paper discourage such
involvement since the government sponsor's role is to select centers, monitor progress, and
financially support a clinical trial. Minimally, unblinded staff should not participate in
discussions or decisions to modify the protocol or be in a position to directly or indirectly,
knowingly or unknowingly, convey information about interim data to others involved in the
study.

233 In special circumstances, regulatory agencies may request information from the sponsor 234 on interim, unblinded data when adverse events of concern have been observed in other studies 235 of the same drug, drug class, or device. The DMC may provide this information to regulatory 236 agencies if the sponsor agrees with the request. However, regulatory actions taken in response to the interim data may have major implications on the ability of the study to continue to 237 238 completion. Thus, before undertaking this approach, regulatory agencies should give careful 239 consideration to all factors, including the strength of the safety signal, quantity of the data, 240 potential for exposure of the general public (e.g., if the study involves a commercially available 241 drug), potential for the action to result in premature cessation of the study, and loss of the ability 242 to achieve a precise answer to the research question of interest. Rather than request access to 243 unblinded data, it may be preferable for regulatory agencies to communicate with the sponsor 244 and request that the DMC undertake closer monitoring for a specific adverse event and allow the 245 DMC to review the data and make appropriate recommendations regarding study continuation or 246 termination. However, this may lead to problems in practice, and regulatory authorities may decide to take their own, independent, responsibility (e.g., Aliskiren Trial to Minimize Outcomes 247 in Patients with Heart Failure [ATMOSPHERE]).^{26;27} Clear communication between the 248

regulators, sponsor, steering committee, and DMC can help to ensure optimal decisions are made that both protect patient safety and trial integrity. These groups should jointly develop processes to streamline interactions (e.g., sharing statistical analysis plans rather than unblinded data in certain circumstances), which might help resolve difficult situations without compromising the role and responsibilities of either group.^{26:27}

254 The DMC acts in an advisory capacity to the executive leadership of the trial and the 255 study sponsor. They make recommendations, which the steering committee and/or sponsor must 256 decide whether or not to follow. Cases have arisen where steering committees or sponsors chose not to follow the recommendation of the DMC.²⁸ Likewise, cases have arisen where sponsors 257 258 have chosen to release information without involving the DMC (e.g., RECORD, SEAS, naltrexone/buproprion).^{22;23;25;29} The DMC charter should describe the course of action that will 259 260 be taken in the case of such disagreements (e.g., clear reporting structure to delineate which party 261 has final decision-making capabilities, processes that will be implemented to resolve 262 disagreements and achieve consensus such as use of a third-party expert panel to act as 263 arbitrator).

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265 IMPORTANCE OF AN EXPERIENCED DATA MONITORING COMMITTEE

The need for an experienced DMC, particularly the committee chair, has been underscored by other authors^{4;17} and regulatory guidance documents.^{2;3} DMCs should ideally comprise 3-5 members, including ideally a specialized statistician with experience in cardiovascular clinical trials and physicians who have clinical training and experience in the field relevant to the specific study, which might extend beyond the immediate disease state of interest to other fields (e.g., hepatology, nephrology, neurology, oncology) if there is pre-existing concern about specific adverse events or toxicities. The data center statistician is a non-voting
contributor who should have pertinent experience to construct reports, may maintain minutes,
and will ensure confidentiality of interim data and DMC proceedings.¹⁷

Prior participation in steering committees is desirable preparation for individuals
interesting in serving on a DMC. Important knowledge is generated through this experience
regarding clinical trial protocol design, study execution and operations, and DMC interactions
that cannot be obtained through seminars, training modules, or reading textbooks or journal
articles on the topic.³⁰

280 The need to prepare more individuals for DMC service has been acknowledged (Table 2).^{4;17;30;31} Membership on a DMC involves reviewing data and making decisions that can be 281 282 highly nuanced, concepts which are challenging to convey in didactic type training programs.³⁰ 283 Mentoring programs are one mechanism that could be implemented to provide opportunity for 284 individuals to participate as non-voting DMC members, alongside experienced DMC members, 285 to gain the skills required for independent DMC service. These programs should be extended to 286 individuals at any career stage. Targeting early career individuals will provide an opportunity to 287 realize many years of qualified service for the training investment. However, late career 288 individuals represent a valuable resource in terms of clinical and research experience, and may 289 have less competing responsibilities than early or mid-career investigators. Sharing DMC experiences after a trial has concluded through publications^{7;28;32-34} or other avenues of 290 291 dissemination (e.g., supplementary material available with the primary publication, postings on 292 clinical trial registry database websites) is also encouraged as a means to educate current and 293 future DMC members and to achieve transparency in the DMC process. The substantial 294 contribution that DMCs often make to clinical trials deserves greater recognition, which might

include being a co-author on papers of study design or primary results, although the potential forintroduction of academic or intellectual bias should be considered.

297

298 ROLE OF THE HEART FAILURE ASSOCIATION AND EUROPEAN HEART

299 AGENCY

A key objective of the HFA workshop was to identify areas where HFA, ESC constituent bodies, and the EHA could contribute to strengthening the utilization of DMCs in cardiovascular and metabolic clinical trials. Several areas of potential involvement were identified and will be further explored and developed by the leadership of these organizations.

304

305 Develop Registry of Data Monitoring Committee Members

306 The importance of access to experienced DMC members was a recurring theme raised 307 during the workshop. DMC members may be selected on the basis of recommendations from the 308 steering committee or industry sponsor, but smaller companies or newcomers to the field may 309 have less knowledge about suitable individuals for DMC service or may lack access to them. 310 The HFA in collaboration with other ESC constituent bodies (i.e., the Clinical Trials Unit of the 311 ESC) could create a registry of potential DMC members, including information on past steering 312 or DMC committee experience and unique expertise they may have in specific disease states or 313 novel therapeutics. This would be a valuable resource for Steering Committees and Sponsors, 314 while also serving to enhance the independence of the DMC since potential members would be 315 first identified by querying the HFA DMC registry rather than by direct nomination from the 316 sponsor or steering committee.

318 Advisory Body for Data Monitoring Committees

319 Managing conflicts of interest was also emphasized during the workshop as a concern for 320 modern DMCs. Conflict of interest information would also be maintained in the registry, and 321 individuals with conflicts that could not be adequately managed (according to clearly pre-defined 322 criteria) would be excluded from selection. For individuals where potential, but manageable, 323 conflicts were present, the HFA or other relevant ESC constituent bodies could advise steps to 324 further mitigate the conflict (e.g., discontinue consultant or advisory activities during the course 325 of the trial). Finally, HFA or other relevant ESC constituent bodies could lobby sponsors to 326 provide indemnification with language that protects DMC members from liability and ensures 327 individual legal counsel will be provided in the event it is needed.

328

329 Develop Training Modules and Facilitate Mentorship Programs

330 The suggested DMC registry would also provide infrastructure to match investigators 331 interested in gaining DMC experience with seasoned DMC members willing to provide 332 mentorship opportunities. The mentorship program would combine web-based training modules 333 with real-life, hands-on experience within a DMC (Table 2). Trainees would be non-voting 334 members of the DMC and would gain exposure to all aspects of the DMC process, including 335 developing a charter, regulatory requirements and expectations for DMCs, reviewing DMC 336 reports, participating in open and closed DMC sessions, and exposure to communication 337 pathways between the DMC, sponsor, steering committee, investigators, and regulatory bodies. 338 The HFA encourages publication of DMC proceedings after completion of those trials where 339 "lessons learned" would be of value for future DMCs. HFA, and more broadly ESC, may be

positioned to facilitate the transparent reporting and public dissemination of this informationthrough its journal, website, and annual meeting.

342

343 CONCLUSION

344 Data monitoring committees play a vital role in protecting human subjects enrolled in 345 clinical trials, and they instill confidence that the integrity of the trial is intact and the data are 346 reliable. The increasingly widespread use of DMCs is accompanied by concerns related to their 347 independence, conflicts of interest, liability protection, and a lack of qualified individuals for 348 DMC service. The topic of DMCs is often discussed in the literature and academic circles, but 349 few efforts have been adopted to address these challenges. During the workshop, the HFA 350 suggested a core set of activities that might be further developed and ultimately implemented to 351 impact these areas. The HFA will continue to advise stakeholders in cardiovascular and 352 cardiometabolic clinical research to promote the integration of independent DMCs in clinical 353 trials where needed, protect the interests of those serving as DMC members, and cultivate highly 354 skilled individuals for DMC service.

356 Figure Legends

357 Figure 1. Ideal Communication Pathways for Unblinded Data

358 Figure represents a "firewall" around the DMC (denoted by thicker border), where one-way

input to the DMC can be provided by regulatory authorities or external DMCs, usually with the

360 knowledge or approval of the steering committee or sponsor. One-way output of unblinded data

361 to the steering committee or sponsor only occurs when premature termination is recommended,

362 although partial flow of unblinded information may occur between a small group of people

363 within the steering committee or sponsor in an adaptive design. The only two-way

364 communication of blinded data occurs between the DMC and the data center statistician.

365 *Regulatory bodies may request (with the knowledge/approval of the steering committee or

366 sponsor) that the DMC monitor specific events if concerns emerge from external trials or data.

³⁶⁷ [†]Other DMCs may suggest specific events for monitoring if concerns emerge from ongoing

368 external trials (with the knowledge/approval of the steering committee or sponsor).

³⁶⁹ [‡]Blinded data may be communicated between the DMC and steering committee and/or sponsor

370 when the DMC has concerns about issues that affect the quality of the study (e.g., concerns about

data integrity, timeliness of reporting adverse events, concerns about the nature of the patients

372 enrolled)

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374 ARO, academic research organization; CRO, contract research organization; DMC, data

375 monitoring committee; EC, ethics committee; IRB, institutional review board

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Table 1. Overview of DMC Monitoring Decisions

Decision	Considerations	Examples of studies (not intended to be
		comprehensive)
Stopping for harm ^{11;28}	• Evidence of harm that creates an	• ILLUMINATE
	unfavorable balance between risks and	• PALLUS
	potential benefits	• MOXCON
	• Review interim data more frequently	• CAST
	• For known or suspected safety issues,	• PROMISE
	stopping boundaries may be defined;	• HERS
	often less stringent than applied when	• ALLHAT
	stopping for benefit or futility	• TRACER
	• Safety is multi-factorial and less	
	amenable to statistical planning.	
	Unexpected safety signals need to be	
	interpreted in the context of	
	multiplicity, biologic plausibility,	

Decision	Considerations	Examples of studies (not intended to be
		comprehensive)
	external data, and the anticipated	
	benefit.	
Stopping for benefit ⁶⁻¹¹	• Should be based on proof beyond a	• ASCOT
	reasonable doubt that a treatment effect	• CIBIS-II
	is adequately robust to allow a	• MERIT-HF
	benefit:risk assessment sufficient to	COPERNICUS
	impact clinical practice and regulatory	• RALES
	decision-making for pivotal trials	• A-HeFT
	• Pre-specified statistical stopping	• EMPHASIS
	guidelines should be more stringent	• MADIT
	early in the trial when the number of	• MADIT II
	events is likely to be small	MADIT-CRT
	• Stopping for benefit should not be	COMPANION
	considered until at least one-half of the	• PARADIGM-HF

Decision	Considerations	Examples of studies (not intended to be
		comprehensive)
	patients have been enrolled or one-half	Physician's Health Study
	of the expected events have	• DCCT
	accumulated	
Stopping for futility ¹¹	• Stopping for futility should not be	• PERFORM
	considered until at least one-half of the	• CONSENSUS II (stopped for futility +
	patients have been enrolled or one-half	harm in other endpoints)
	of the expected events have	• ALTITUDE (stopped for futility +
	accumulated	harm in other endpoints)
	• Should consider potential for loss of	• EchoCRT
	information on clinically relevant	
	secondary endpoints, safety, a delayed	
	treatment effect, definitive evidence of	
	neutrality, or other important	
	knowledge that may be generated by	

Decision	Considerations	Examples of studies (not intended to be
		comprehensive)
	the trial	
	• Predictive and conditional power are	
	useful concepts when considering	
	futility	

ALLHAT = Antihypertensive and Lipid-Lowering Treatment to Prevent Heart Attack Trial; ALTITUDE = Aliskiren Trial in Type 2 Diabetes Using Cardiorenal Endpoints; CAST = Cardiac Arrhythmia Suppression Trial; DCCT = Diabetes Control and Complication Trial; EchoCRT = Echocardiography Guided Cardiac Resynchronization Therapy; HERS = Heart and Estrogen/Progestin Replacement Trial; ILLUMINATE = Investigation of Lipid Level Management to Understand its Impact in Atherosclerotic Events; MERIT-HF = Metoprolol CR/XL Randomized Intervention Trial in Chronic Heart Failure; MOXCON = Moxonidine Congestive Heart Failure Trial; PALLUS = Permanent Atrial Fibrillation Outcome Study Using Dronedarone on Top of Standard Therapy); PERFORM = Prevention of Cerebrovascular and Cardiovascular Events of Ischemic Origin with Terutroban in Patients with a History of Ischemic Stroke or Transient Ischemic Attack; PROMISE = Prospective Randomized Milrinone Survival Evaluation; RALES = Randomized Aldactone Evaluation Study; TRACER = Thrombin Receptor Antagonist for Clinical Event Reduction in Acute Coronary Syndrome

		Type of Training	
	Web-based Didactic Training Modules	Training Workshops (1-2 day)	Hands-on Training
Content	Review of regulatory guidance	Presentation of case studies	• Assign trainee to a DMC as non-
	involving DMCs	from past real-life DMC	voting DMC member
	• Discussion of charter and what should	experiences and interactive	• Partner trainee with experienced
	be included	discussion about possible	DMC member, provide mentorship
	• Introduction to contractual agreements	actions, DMC decision	• Participate in all aspects of DMC
	and indemnification considerations	making and implications	(e.g., drafting charter, reviewing
	• Introduction to viewing and	• Basic training on statistical	contracts, negotiating
	interpreting sample interim data reports	issues including stopping	indemnification, review of protocol
	• Methods and processes to maintain	rules and analysis of safety	and analysis plan, review of draft
	appropriate firewalls between DMC	data	data report, review of actual data
	and other study personnel	• Interpretation of data reports	reports, participation in all
	• Presentation of case examples	• Sample exercises for writing a	meetings, including sponsor or
		DMC charter	steering committee interactions)