The Johns Hopkins Center for Clinical Trials Monitoring treatment effectiveness and safety in clinical trials 19 - 20 June 2003

Baltimore School of Nursing Auditorium

Selection of committee members: Competency vs objectivity

(Thursday) 19 June 2003

Curtis L Meinert, PhD

The Johns Hopkins University Bloomberg School of Public Health Department of Epidemiology Baltimore Maryland

Treatment effects monitoring
Assertions
Objective/competent
Objectivity vs competency: Nüremberg Code
The principle of competence
Objectivity vs competency in trials
On why objectivity takes precedence over competency in monitoring
Monitoring objectivity constructs
Requirements for competent monitoring
Dogma re monitoring
Meinert's "ideal" monitoring body
Multicenter trials profile
TEMC profiles
TEMC profile
Selected references
Acknowledgements

Generation time and date: (6:37am Friday) 16 May 2003; Location: \TEMBody

Treatment effects monitoring

In trials, the act of or an instance of reviewing accumulated outcome data by treatment group to determine if the trial should continue unaltered.

treatment effects monitoring committee (TEMC) n - [trials] A standing committee in the structure of trials responsible for the periodic review of accumulated data for evidence of adverse or beneficial treatment effects and for making recommendations for modification of a the trial based on accumulating data. syn: data monitoring committee, data and safety monitoring committee, safety monitoring committee

\BioGrand\TEMC

Assertions

- 1. Treatment effects monitoring is an inalienable duty of study investigators
- 2. Requirements for competency in monitoring must supersede requirements for objectivity
- 3. That requirement is violated when the monitoring is comprised to exclude study representatives having intimate familiarity with details of the study protocol and study data
- 4. Monitoring bodies devoid of study investigators and commissioned to report to sponsors constitute violations of fundamental ethical codes underlying research on human beings

\TEMBody\Thesis

Objective/competent

objective n - Uninfluenced by emotion, surmise, personal prejudice, or bias; not subjective.

competent *adj* - Having the requisite skills, abilities, and qualities sufficient to allow one to perform up to some standard or level

\BioGrand\Obj&Com

Objectivity vs competency: Nüremberg Code

Item 2: The experiment should be such as to yield fruitful results for the good of society, unprocurable by other methods or means of study, and not random and unnecessary in nature

Item 8: The experiment should be conducted only by scientifically qualified persons. The highest degree of skill and care should be required through all stages of the experiment of those who conduct or engage in the experiment

\TEMBody\Item2vs8

The principle of competence

A principle in medical ethics asserting that the care and treatment offered to research subjects must be consistent with accepted standards of care and treatment and that such care and treatment must be offered and applied in a competent fashion by people having the requisite skills, expertise, information, knowledge, and wherewithal necessary to ensure competence

\BioGrand\PrinCom

Objectivity vs competency in trials

- Need for competency supersedes need for objectivity (eg, in regard to conduct, one cannot mask treatments if doing so carries more than minimal risk for subjects)
- · Most objectivity constructs have potential for reducing competency
- The tendency, in regard to monitoring, is to impose objectivity constructs assuming no effect on competency

\BioGrand\ObjvCom

On why objectivity takes precedence over competency in monitoring

Because

- Sponsors and the FDA value objectivity over competency
- Decision making re monitoring is believed to be largely a statistical question
- · Investigators marginalization and disenfranchising re monitoring
- · IRBs don't get it
- No presumed downside

\TEMBody\Tension

Monitoring objectivity constructs

- P-value-based pre-ordained stopping rules
- "Look" restrictions; re number of "looks" allowed and on what can be "looked" at
- · Masked analysts
- Firewall separation in the coordinating center to keep the CC Director and other key CC personnel from seeing interim results; especially when person is seated on the study steering committee
- TEMC masked
- TEMC voting members not associated with the trial
- TEMC study representatives limited to those not having treatment responsibilities in the trial
- TEMC votes and deliberations in closed executive sessions
- TEMC members appointed by sponsor
- TEMC commissioned to report to sponsor

\BioGrand\ObjCon3

Requirements for competent monitoring

- Timeliness
- · Completeness of data
- Accuracy
- Independence
- Unmasked
- Unconstrained by construct
- · Medical, scientific, and analytic competence
- · Detailed knowledge of study protocol and procedures

\TEMBody\Require

Dogma re monitoring

- · Isolated from study investigators
- Pre-ordained # looks (to protect p-values) and stopping rule
- Masked reports
- Firewall separations

\TEMBody\Dogma

Meinert's "ideal" monitoring body

Size: 10 (5 voting and 5 nonvoting)

Standing: Nonvoters at parity with voters except when voting

Voting members (no study affiliation):

Expertise in disease and treatments being evaluated (at least 2 such people)

Biostatistician/trialist

Safety expert

Medical ethicist or theologian

Nonvoting members (study affiliated)

Study chair and vice chair

Director and deputy director of CC

Sponsor project officer

Treater

Meeting

Mode: Face-to-face; conference telephone in emergency

Frequency: At least twice a year

Reports

- Prepared by CC; distributed at least 7 days prior to meeting
- Unmasked
- · Bound and page numbered

Deliberations and votes: Open (ie, no executive sessions for voting members only re recommendations)

Reporting: To the chair of the steering committee

\TEMBody\Meinert

Multicenter trials profile

-	Disease/organ	CC	Type	Trt	Sponsor	Status
ADAPT	Alzheimer	JHU	Pri	Drug	NIH-NIA	Ongoing
CBET	Cancer	JHU	Pri	Drug	NIH-NCI	Ongoing
COMBINI	E Alcoholism	UNC	Trt	Drug/Counsel	NIH-NIAAA	Ongoing
CAMP	Asthma	JHU	Trt	Drug	NIH-NHLBI	1999
GCCRT	AIDS	JHU	Trt	Drug	NIH-NEI	2000
LODO	Asthma	JHU	Trt	Drug	ALA	2003
NETT	Emphysema	JHU	Trt	Surg/med	NIH-NHLBI	2003
OCTAVE	BP	BMS	Trt	Drug	BMS	2000
WGET	Vascular	JHU	Trt	Drug	NIH-NIAMS	2003

\TEMBody\Studies

TEMC profiles

	Members						
		w/o		CC	Director	Study	Project
	Vote	vote	Tot	firewall	CC	chair	officer
ADAPT	5	2	7	N	Y	N	Y
CBET	5	6	11	N	Y	Y	Y
COMBIN	E 4	1	5	N	Y	N	Y
CAMP	10	-	10	N	Y	N	Y
GCCRT	7	3	10	N	Y	Y	Y
LODO	5	-	5	N	Y	N	Y
NETT	11	-	11	N	Y	N	Y
OCTAVE	5	1	6	Y	N	N	N
WGET	5	2	7	\mathbf{N}	Y	Y	Y

\TEMBody\TEMC1

TEMC profile

	Appointing		-	Reporting
	authority	Masked	Votes	route
ADAPT	SC	N	Open	SC
CBET	SC	N	Open	SC
COMBINE	SC	Self	Open	SC
CAMP	NHLBI	Y	Closed	Sponsor
GCCRT	NEI	N	Open	Sponsor
LODO	SC	Y	Open	Sponsor
NETT	NHLBI	N	Closed	Sponsor
OCTAVE	BMS	N	Closed	Sponsor
WGET	NIAMS	Y	Closed	Sponsor

\TEMBody\TEMC2

Selected references

- 1. Ellenberg S, Fleming T, DeMets DL: Data Monitoring Committees in Clinical Trials: A Practical Perspective. John Wiley & Sons, Ltd., West Sussex, 2002.
- 2. Meinert CL, Tonascia S: Clinical Trials: Design, Conduct, and Analysis. Oxford University Press, New York, 1986.
- 3. **Meinert** CL: Clinical trials dictionary: Terminology and usage recommendations. The Johns Hopkins Center for Clinical, Baltimore, 1996.
- 4. Meinert CL: Masked Monitoring in Clinical Trials Blind Stupidity? New Eng J Med 338:(19)1381-1382, 1998
- 5. Meinert CL: Clinical Trials and Treatment Effects Monitoring (with discussion). Controlled Clin Trials 19:515-522, 1998
- 6. Meinert CL: IRBs and Randomized Clinical Trials. IRB 20:(2-3)9-11, 1998
- 7. Meinert CL, Tonascia S: Clinical Trials: Design, Conduct, and Analysis. Oxford University Press, New York, 1986. (Meinert and Tonascia, 1986)
- 8. Piantadosi S: Clinical Trials: A Methodologic Perspective. John Wiley & Sons, Inc., New York, 1997
- 9. Royall RM: Ethics and Statistics in Randomized Clinical Trials (with discussion). Stat Sci 6:(1)53-88, 1991
- 10. Friedman LM, Furberg CD, DeMets DL: Fundamentals of Clinical Trials (Second Edition). PSG Publishing Company, Inc., Littleton, Massachusetts, 1985.

\BioGrand\Refs

Acknowledgements

Betty Collison Susan Tonascia

Slide set on: TrialsMeinertsWay.Com

\TEMBody\AckNow