1.0 Purpose:

To describe the Division of Microbiology and Infectious Diseases (DMID) policy for the role of a DMID Medical Monitor (MM) in providing safety oversight.

2.0 Scope:

This policy applies to DMID studies where risk/resource assessment indicates the need for medically qualified individuals to be involved in safety oversight and pharmacovigilance.

3.0 Policy:

The DMID Office of Clinical Research (OCRA) will assign a MM to review and evaluate information relevant to the safety of products used in all DMID-supported clinical trials and selected studies as indicated by OCRA’s and the Scientific Branch’s assessment of safety factors. The MM has the responsibility to review and evaluate information relevant to the product safety throughout the development and implementation of the protocol.

The MM will be responsible for providing safety oversight and reviewing the protocol (e.g., study halting rules) and information about the study product as it becomes available, such as the Investigational Brochure (IB), other DMID trials, and reported safety events. The DMID MM, in consultation with the protocol team and safety oversight committees, will provide safety review during the execution of the clinical trial. This oversight includes reviewing safety information and providing applicable recommendations. The DMID MM provides recommendations, as appropriate, to members of the study team, which may include, but is not limited to: DMID, the funder, manufacturer, and IND holder. This data and safety review facilitates early detection of safety signals and maximizes the chances for continued appropriateness of the research and protection of human subjects.

Based on a synthesis of this information, the DMID MM will provide appropriate recommendations to the funder and/or IND holder. When DMID is the IND/IDE sponsor, the MM is the person who is responsible for reviewing and evaluating safety information. When DMID is not the IND/IDE sponsor, the regulatory responsibility is held by the IND/IDE sponsor and the DMID MM is advisory to the funder.

4.0 Background:

NIH requires that each Institute and Center (IC) have a system for the appropriate oversight of the conduct of clinical trials to ensure the safety of study participants. Moreover, for studies in which the Division is the Investigational New Drug Application (IND) or Investigational Device Exemption (IDE) sponsor, DMID is responsible for monitoring study participant safety. When DMID is the IND sponsor, the MM, as the named person on box 15 of the Form FDA 1571, has the responsibility to review and evaluate information relevant to product safety. The responsibility to monitor the conduct and progress of the clinical trial is with DMID personnel named in box 14 of the Form FDA 1571 (generally the Clinical Project Manager). For studies in which DMID is the IDE sponsor, the MM is responsible for evaluating unanticipated adverse device effects.

DMID Branches/Offices collaborate with the MM on safety oversight. This collaboration helps to meet human subjects’ safety standards as defined by applicable Federal regulations,
International Conference on Harmonization (ICH) Good Clinical Practice Guidelines (GCP), NIAID Clinical Terms of Award, and NIH/NIAID/DMID Policy and Guidelines for Data and Safety Monitoring.

5.0 Definitions:

Pharmacovigilance: The process of collecting, monitoring, and evaluating adverse events in clinical trials for safety signals.

Safety Oversight: Generally speaking, safety oversight is the science of collecting, monitoring, researching, assessing and evaluating information from healthcare providers and subjects on the adverse effects of medications, biological products, and investigational devices with a view to identifying new information about hazards associated with medicines and preventing harm to patients.

6.0 Responsibilities:

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| Director, Office of Clinical Research Affairs | • Assign MM to appropriate protocols  
• Review findings from MM activities as applicable |
| Medical Monitor | • Review protocol halting rules  
• Advise protocol team on safety oversight  
• Evaluate adverse events/SAEs and reviews safety reports  
• Confer with Independent Safety Monitors  
• Participate on safety oversight committees  
• Advise IND sponsor |
| DMID Clinical Trials Management contractor | • Assist MM with pharmacovigilance activities |
| DMID Scientific Branches | • Interact with the MM on safety oversight |

7.0 References:

International Conference on Harmonization (ICH) E6: Good Clinical Practices

Code of Federal Regulations Title 45, Part 46: Protection of Human Subjects

Code of Federal Regulations Title 21, Part 312: Investigational New Drug Application

Code of Federal Regulations Title 21, Part 812: Investigational Device Exemption

8.0 Inquiries:

Questions or comments regarding this policy may be directed to:

Associate Director of Clinical Research  
Division of Microbiology and Infectious Diseases (DMID)  
NIH / NIAID
5601 Fisher Lane, Rm. 7E60
Bethesda, MD 20892
DMIDPolicyQuery@mail.nih.gov

9.0 Availability:

This policy is located electronically at:
http://www.niaid.nih.gov/LabsAndResources/resources/DMIDClinRsrch/Pages/safetyoversight.aspx

10.0 Change Summary:

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