REGULATORY AFFAIRS

ANIMAL HEALTH



What is a DMP, and Why is it Important?





The Data Management Plan (DMP) is a document that outlines the flow of data for a clinical research project from data collection to data submission. If properly written, a DMP will ensure the integrity of the data collected making sure it is fit for purpose. The DMP is also an auditable document often asked for by regulatory inspectors.



Like a Protocol details the flow of a research project, the DMP details the flow of the data.

Study Protocol

Table of Contents

Title of the study Identifier unique to the study

Study contacts
Identity of the sites

Objective(s)/purpose of the study Justification

Schedule of events

Study design

Animal selection and identification

Inclusion/Exclusion and post-inclusion criteria

Animal management and housing Animal feeds

Investigational veterinary and control product(s)

Treatment

Disposal of study animals, products of study animals and investigational and control vet product(s)

Assessment of effectiveness Statistics/Biometrics

Handling of records

Adverse events Supplements to be appended to the protocol

Changes to the study protocol

References

Data Management Plan

Table of Contents

Approval Page Protocol Summary

Access Rights

Case Report Forms (CRFs) or Electronic Case Report Forms (eCRFs)

Database Details

Data Collection and Flow

Database Lock

Database Export/Storage/Archive

External Data Transfers

Data Validation and User Acceptance Testing

Dictionary Coding

Serious Adverse Event (SAE) Reporting and Reconciliation

Protocol Deviations

Quality Control/Quality Assurance/Audit Plans

Optional Miscellaneous Items (Timelines, Metrics, Reports, Definitions, Acronyms, Communication)



The DMP is the FOUNDATION

"You can't build a house without a good, solid foundation"







The DMP is also a ROADMAP

"Dictates the flow of the data from collection to submission"





So why is the DMP important?

- *Consistency* consistent approach to the process and guidelines
- Reproducibility process can be reproduced with no changes to outcome
- Accountability provides a description of the flow and directly outlines who is responsible for process actions
- *Transparency* to stakeholders and regulatory authorities



Should follow some minimum standards:

- Completed prior to enrollment of 1st Subject
- Supports applicable regulations and oversight agencies
- Identifies and defines personnel and roles who is in charge of decision making, data collection, data handling, and data quality
- Contains key data items that define the flow from collection to submission



Key data items the DMP should contain*:

- Approval Page
- Protocol Summary
- Access Rights
- Case Report Forms (CRFs) or Electronic Case Report Forms (eCRFs)
- Database Details
- Data Collection and Flow
- Database Lock
- Database Export/Storage/Archive

^{*} Reference to Society for Clinical Data Management's Good Clinical Data Management Practices October 2013 Edition



Key data items the DMP should contain*: (cont.)

- External Data Transfers
- Data Validation and User Acceptance Testing
- Dictionary Coding
- Serious Adverse Event (SAE) Reporting and Reconciliation
- Protocol Deviations
- Quality Control/Quality Assurance/Audit Plans
- Optional Miscellaneous Items



Approval Page

Official signatures and dates of key stakeholders of the data portions of the project. May include the signatures of the following team members:

- Data Manager (author)
- Clinical Operations Team Lead
- Product/Project Lead
- Statistician
- Data Coder
- Pharmacovigilance Team Lead

Provides official documentation to the agreement of the responsibility and accountability of data management of the project.



Protocol Summary

This is a brief description of the project that the DMP is supporting. Usually points taken directly from the protocol in which the DMP is following. Can include the following items:

- Protocol Title
- Protocol Number
- Objectives
- Primary/Secondary Endpoints/Critical Data Analysis
- Visit Schedule
- List of Protocol Revisions/Amendments and associated version numbers

The Protocol Summary is the official link of the DMP to a particular project.



Access Rights - Roles/Permissions/Security/Training

This section of the DMP should specify the key personnel with roles and responsibilities associated with the protocol, as well as the training requirements associated with each. This list includes the available database roles within the system being used. Each role should have a description of the associated privileges/permissions. Maintenance of database roles (possibly a corresponding company SOP) should be referred to as well.

Description of the network equipment/servers as well as security of electronic records within the system should be addressed here as well. It is a good idea to reference the company database backup SOP in this section.



Case Report Forms (CRFs) or Electronic Case Report Forms (eCRFs)

The CRF/eCRF design process, or reference to related company SOP, should be included in the DMP, along with a copy of the finalized CRFs/eCRFs.

Instructions for CRFs/eCRFs completion should be included as well.

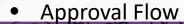
The process, or reference to the related company SOP, for handling changes to finalized CRFs/eCRFs should also be included in this section the DMP.



Database Details

This section of the DMP contains a description of how the database is designed, created and maintained. It should provide general information about the database system, as well as the following types of specific information directly related to the project:

- Annotated CRFs/eCRFs (Forms/Field Specifications/Visits)
- Sites/Treatment Groups
- Form Rules
- Code Lists
- Skip Logic
- Edit Check Specification





Data Collection and Flow

This section should include data entry and processing plans. This may include or reference the following:

- Data Entry Guidelines
- Data Handling Guidelines
- Data Discrepancy Conventions
- Data Receipt
- Data Processing
- Data Entry
- Data Review
- Self-evident Corrections



Database Lock

This section should include details defining the criteria for database lock:

- Who is responsible for database lock
- What processes will be used for database lock
- What processes will be used for database unlock and relock
- Reference to the related company SOP



Database Export/Storage/Archive

Should include specific details regarding extracting data from the database:

- Field/Form specifications
- Format
- Method or location
- Recipient of data
- Frequency
- QC/Validation steps performed to maintain integrity
- Reference to the related company SOP



External Data Transfers

Similar to export, should include specific details regarding transferring data to and from the database:

- Field/Form specifications
- Procedures for collecting and handling the data
- Format
- Method or location
- Recipient of data
- Frequency
- QC/Validation steps performed to maintain integrity



Data Validation and User Acceptance Testing

This section of the DMP should define the process, or refer to the related SOP, for ensuring the integrity (complete, correct, allowable, valid, consistent) of all related database programming. This includes, but not limited to:

- Data Entry/EDC Screens
- System Logic and Flow
- Edit Checks
- Security/Backup/Archiving

The documentation practice for validation and user acceptance testing should also be provided.



Dictionary Coding

This section of the DMP should list which medical coding dictionaries and versions of each dictionary will be used for the study. Instructions for updates or changes to the dictionaries should be included as well. Fields and forms associated with coding should be listed, indicating how the coding will occur (auto or manual) and by whom.



Serious Adverse Event (SAE) Reporting and Reconciliation

This section of the DMP should provide details about the data fields and external databases requiring reconciliation per the protocol. Should also indicate how the SAE reporting and reconciliation will occur, when it will occur and by whom.

Data fields typically included in Serious Adverse Event reconciliation:

- Clinical Signs/Diagnosis
- Start Date
- End Date/Ongoing
- Causality
- Action Taken
- Outcome







Protocol Deviations

This section of the DMP should provide details about how protocol deviations should be recorded and handled. As well as how they maintained ALCOA.

Per CVM, Protocol Deviations should include:

- Date of Deviation
- Description of Deviation
- Corrective Actions
- Impact of Deviations



Quality Control/Quality Assurance/Audit Plans

This section of the DMP should address the level of quality control (or verification that the requirements for quality have been fulfilled) that is going to be completed, as well as how this step is going to be executed and documented.

Quality Assurance (actions that are established to ensure data is in compliance with applicable regulatory requirements) or an audit plan should also be defined. If the QA steps are not detailed in the DMP, then there should be reference to related company SOP.



Optional Miscellaneous Items

- Timelines
- Metrics
- Reports
- Definitions
- Acronyms
- Communication
- Interim Analysis Requirements
- Business Rules
- Flowcharts
- Blind Data Review Specifications



Contact Information



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