

The purpose of this worksheet is to provide support for the convened IRB reviewing serious non-compliance, continuing non-compliance, unanticipated problem involving risks to subjects or others/unanticipated problem report (UPR), suspension of IRB approval, and termination of IRB approval. This worksheet, or equivalent, is to be used. This worksheet does not need to be completed or retained.

1 Considerations for Review of Reportable Events

What is/are the event(s)?

Does the event involve risk(s) to subjects? Yes No

If yes, what risk is posed:

Does the event involve risk(s) to data integrity/analysis? Yes No

If yes, how:

If yes, is there an appropriate plan to mitigate the effect? Yes No

If yes, what is the plan:

Is the root cause accurately/completely identified? Yes No

If yes, what is the root cause:

Is a determination in Section 2 able to be made based upon the information provided? Yes No

If no, obtain more information from the investigator and/or research team.

If yes, proceed to Section 2.

2 Determinations (At least one must be checked)

Non-compliance that is neither serious nor continuing

Serious non-compliance

Continuing non-compliance

Unanticipated problem involving risks to subjects or others/unanticipated problem report (UPR)

None of the above

3 If the determination involves non-compliance, is the corrective and preventive action (CAPA) plan adequate?¹ Yes No

Suggested actions:

4 If the determination is unanticipated problem involving risks to subjects or others/unanticipated problem report (UPR), are additional actions required to mitigate risk(s) to subjects or others? Yes No

5 Post-Review Actions Needed (More than one may be checked)

- | | | | |
|--------------------------|--|--------------------------|---|
| <input type="checkbox"/> | Modify the protocol. | <input type="checkbox"/> | Notify investigators at other sites. |
| <input type="checkbox"/> | Modify the information disclosed during the consent process. Should enrollment be halted until consent form is revised? Yes <input type="checkbox"/> No <input type="checkbox"/> | <input type="checkbox"/> | Consider whether changes without prior IRB review and approval were consistent with ensuring the subject's continued welfare. |
| <input type="checkbox"/> | Provide additional information to current subjects, whenever the information may relate to the subject's willingness to continue. | <input type="checkbox"/> | Allow continuation of some research activities under the supervision of an independent monitor. |
| <input type="checkbox"/> | Provide additional information to past subjects. | <input type="checkbox"/> | Make arrangements for clinical care outside the <u>research</u> . |
| <input type="checkbox"/> | Have current subjects re-consent. | <input type="checkbox"/> | Transfer subjects to another investigator. |
| <input type="checkbox"/> | Increase the frequency of continuing review. | <input type="checkbox"/> | Require follow-up of subjects for safety reasons. |
| <input type="checkbox"/> | Observe the <u>research</u> . | <input type="checkbox"/> | Require <u>adverse events</u> or outcomes to be reported to the IRB and the sponsor. |
| <input type="checkbox"/> | Observe the consent process. | <input type="checkbox"/> | Suspend IRB approval. |
| <input type="checkbox"/> | Require additional training of the investigator. | <input type="checkbox"/> | Terminate IRB approval |
| <input type="checkbox"/> | Request audit by appropriate compliance group. | <input type="checkbox"/> | Notify funding agency and/or Food and Drug Administration (FDA), as appropriate. |

Other:

¹ The corrective and preventive action plan is adequate if it addresses the identified root cause of the event and does not rely solely on re-training of personnel or the memory of study personnel. That is, there should be a physical/electronic check to ensure compliance (such as a checklist or calendar reminder, as appropriate).