

Memo

Date: 23 November 2011
To: Investigators, Research Staff, and Sponsors
From: Lori Roesch, CIM, CIP, Manager, Research Subject Protection Program
Re: *Summary of Aurora IRB Policy for EXTERNAL Unanticipated Problems Requiring Immediate Reporting*



Research Subject
Protection Program

External Unanticipated Problems meeting the Aurora IRB policy definition must be reported to the Aurora IRB within five (5) working days of the local investigator becoming aware of the problem. The following criteria must be met and documented:

1. **“Unexpected”** meaning that the specificity and severity are not accurately reflected in the information previously submitted to the IRB (e.g. protocol, Investigator Brochure and/or informed consent document). [Note an event is considered “unexpected” if it occurs at a specificity or severity that is inconsistent with prior observations, such as what is described or addressed in the information previously submitted to the IRB.]
2. **“Possibly Related Or Related To The Research Procedures”** Possibly Related means there is a reasonable possibility that the incident, experience or outcome may have been caused by the procedures involved in the research. Reasonable means a strong temporal relationship to the study protocol, and implies that an alternative etiology is unlikely or significantly less likely. Related means related to the use of the research procedure and implies a definitive relationship.

AND

3. Would have implications for the conduct of the study (e.g., requiring a significant and usually safety-related change to the protocol such as revising inclusion/exclusion criteria or including a new monitoring requirement, informed consent or investigator’s brochure). This is referred to locally as a “Risk Mitigation Plan”.

The sponsor or reporting agency should be clear about the determination of the third point. Often times the following [or similar] language is included: “The sponsor does not believe that changes to the conduct of the clinical trial are warranted in response to this case report at this time”. This statement can be interpreted to mean that responsible agency has made a determination that the problem does not present a risk of harm to subject or others. The Aurora IRB interprets this statement to mean that such an event would not need to be reported to the IRB.

The local investigator can disagree with a sponsor or reporting agency’s assessment, and is expected to alert the IRB to an External Unanticipated Problem that, in his or her opinion, is unexpected, related or possibly related, and has implications for the conduct of the study. The report must include the local investigator's rationale for the disagreement and plan to manage or mitigate the problem.

External Unanticipated Problems should be reported to the Aurora IRB via a **Significant New Findings Reporting Form (RR403-F)** or **External Unanticipated Problem Reporting Form (RR403-B)**, and include all supporting documentation. If the “Risk Mitigation Plan” involves a change, a Modification Form should also be submitted for IRB approval and notations should be included cross-referencing the Modification and form reporting the problem. The Aurora IRB will rely on the sponsor to notify the appropriate regulatory agencies of problems occurring at an external site.

External events that do not meet the above criteria, but are required by the sponsor to be reported to the IRB, should be compiled and submitted at the time of continuing review. A sample spreadsheet for reporting events at the time of continuing review is available on the RSPP web site.

Please direct any specific questions regarding this policy to the RSPP office at 414.219.7744.