Conducting
Clinical Risk Assessments
And
Implementing Compliance Practices

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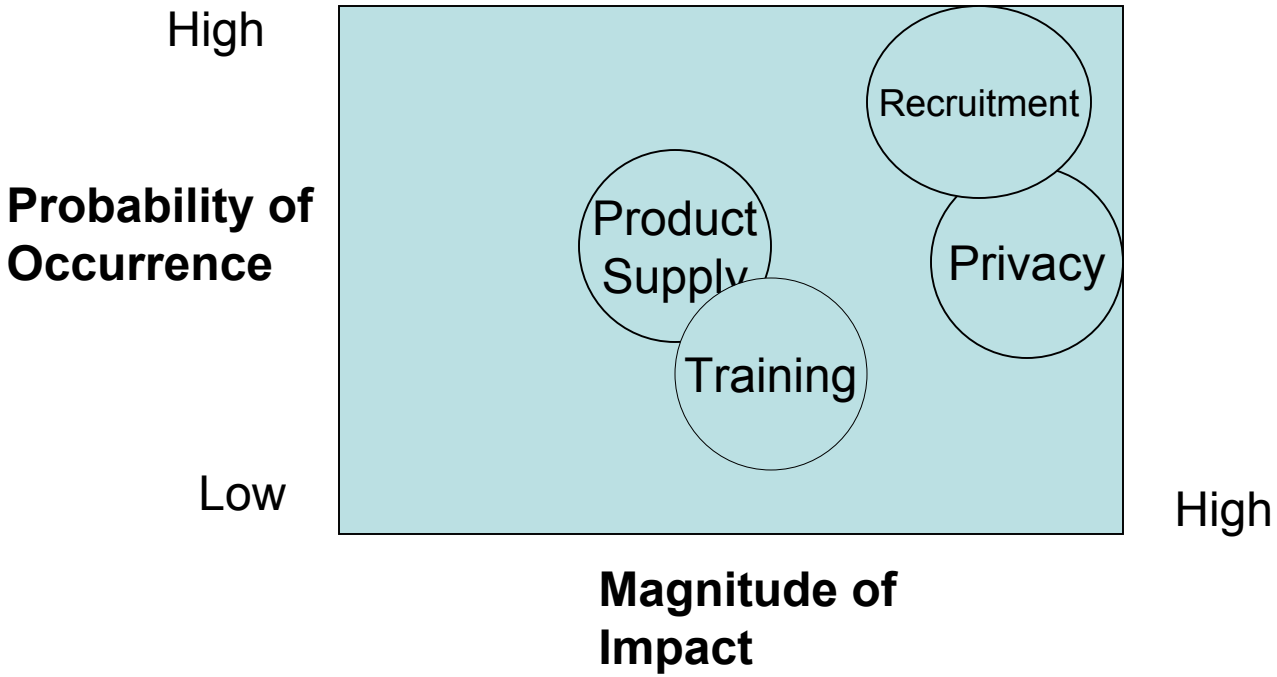
Risk Environment

- Subject safety
- Increased regulatory oversight
- Data quality
- Time to market
  - Competition
  - Financial, shareholder and customer expectations
  - Increasing costs

Risk Assessment Objective



Probability of Occurrence = Probability that a regulatory/legal, financial, or operational event with negative consequences will occur

Magnitude of Impact = The potential consequences of such an event

Risk Tolerance = Probability X Impact

Assessment Objectives

Evaluate

- Good Clinical Practice Compliance
  - Statutory
  - Standards
    - ICH (1997)
- Compliance with the company's ethical commitments
- Compliance with company policies, SOPs

Assessment Scope

- All clinical development
- One project or product
- Unique type of research
- Specific clinical sites
- Population segment
- Clinical product constraints

Assessment Design

- Develop reporting strategy
  - Privilege considerations
  - Ex-US law
    - For example, interviewing protocols
- Establish terms of reference
  - laws, policies, regulations, procedures, company practice
- Identify subject matter experts
- Develop sample size
- Develop timeline

Risk Assessment Methodology

- Management interviews
  - 2nd and 3d tier down
  - Key performance indicators
- Informal contacts with support staff
- Use Regulatory, Quality resources
  - Best practices for controls
- Document reviews
- Experience with impact of similar events

Assessment Activities Examples

- Review documents for relevant regulatory authority compliance
  - Completion and accuracy
  - Protection
  - Verifiable backup
  - Drug accountability
  - Relevant policies

Assessment Activities Examples

- Review qualifications and work-product of internal and external clinical auditors and monitors
- Confirm adverse event reporting compliance
- Audit company and site training records for content and implementation

Assessment Activities Examples

- Review human subject protections
  - Recruitment procedures
  - Increasing competition for subjects
  - Recruitment reward systems
  - Referrals from treating physicians
  - Subject demographics
  - Internet marketing
  - Informed consent
- IRB review
- Privacy
  - HIPPA
  - EU Privacy
- Data management

THESE STRATEGIES RAISE CONCERNS

Erosion of Informed Consent process

Compromise of Confidentiality

Enrollment of ineligible subjects

IRB oversight

TIME OUT

WORK PRODUCT CONSIDERATIONS

- Discuss initial findings and presentation with counsel
- Ensure appropriate privilege protections for assessment documents

ASSESSMENT PRESENTATION

- Discuss with findings with management
  - Complete risk tolerance diagram
  - Prioritize identified risks
  - Design mitigation strategies
  - Develop corrective action plan
    - Who, what, where, when, why
  - Establish corrective action monitoring plan
    - Consider resource allocation

YOUR ROLE IN IMPLEMENTATION

- Advise responsible personnel as needed
- Review corrective actions periodically
- Confirm completed corrections
- Monitor operations on ongoing basis

NEXT STEPS

- Compose debrief for your own records to establish compendium of assessment best practices.

- Prepare for next risk assessment.