

Promptly Reportable Information & Events; When to Report Unanticipated Problems & Protocol Violations

IRB Forum

April 2015

Policy

Report the following information items to the IRB within 5 business days of knowledge of the event:

- * New or increased risk, or a safety issue;
- * Any harm experienced by a subject or other individual, which in the opinion of the investigator, are unexpected and possibly related to the research procedures;
- * Internal Serious Adverse Events;
- * Finding of Noncompliance with the federal regulations governing human research or with the requirements or determinations of the IRB, or Allegation of Noncompliance;
- * Protocol deviation made without prior IRB approval to eliminate an apparent immediate hazard to a subject;
- * Breach of confidentiality;
- * Unresolved subject complaint;
- * Incarceration of a subject in a research study not approved to involve prisoners;
- * Unanticipated adverse device effect;
- * Suspension or premature termination by the sponsor, investigator, or institution;
- * Audit, inspection, or inquiry by a federal agency;
- * Written reports from a federal agency (e.g., FDA Form 483);
- * State medical board or hospital medical staff actions;
- * Other information that the sponsor/CRO has directed the PI to report to the IRB, even if not on this list.

New or Increased Risk

- * New information (ex: an interim analysis, data safety monitoring report, IND safety report, publications indicating a new risk, sponsor report, or investigator finding) that indicates an increase in the frequency or magnitude of a previously known risk, or uncovers a new risk;
- * An investigator brochure, package insert, or device labeling revised to indicate an increase in the frequency or magnitude of a previously known risk, or describe a new risk;
- * Withdrawal, restriction, or modification of a marketed approval of a drug, device, or biologic used in a research protocol;
- * Protocol deviation that harmed subjects or others or that indicates subjects or others might be at increased risk of harm or affects the integrity of the research data;
- * Complaint of a subject that indicates subjects or others might be at increased risk of harm or at risk of a new harm;
- * Any changes or information significantly affecting the conduct or integrity of the research;
- * **EXAMPLE:** A MedWatch report is released that would impact the inclusion and exclusion criteria and potentially increase risk to subjects.
- * **EXAMPLE:** A data security breach for a qualitative study involving focus groups and interviews of homeless teenagers.

Unanticipated, Related Harms

- * A harm is “unexpected” when its severity is inconsistent with risk information previously reviewed and approved by the IRB in terms of nature, severity, frequency, and characteristics of the study population.
- * A harm is “possibly related” to the research procedures if in the opinion of the investigator, the research procedures may have possibly caused the harm.
- * **EXAMPLE:** After administration of study drug, a subject develops a severe rash that is not an anticipated adverse effect of the drug.
- * **EXAMPLE:** An interview question triggers emotional reaction from subject. The emotional reaction is unrelated to the interview protocol and stated risks.

Internal Serious Adverse Events

- * Death related to study or procedures, *excluding death due to disease progression.*
- * Life-threatening , requires or prolongs inpatient hospitalization;
- * Results in persistent or significant disability/incapacity;
- * Constitutes a congenital anomaly or birth defect;
- * Medically significant and which the investigator regards as serious based on appropriate medical judgment.

Finding of Noncompliance or Allegation of Noncompliance

- * Determination from the Office for Human Research Protections (OHRP);
- * Form 483 from the Food and Drug Administration (FDA);
- * Report of noncompliance to federal agencies.

Protocol Deviation Made without Prior IRB Approval

- * Protocol deviation made without prior IRB approval to eliminate an apparent immediate hazard to a subject.
- * EXAMPLE: Additional ECG and blood draw 15 minutes after study drug administration visit to assess cause of subject chest pain.
- * Not as common for studies that are social/behavioral in nature. Should an issue arise, please submit a report.

Breach of Confidentiality

- * Study files are lost, stole, misplaced;
- * Study team members discuss subject's study information with non-team members (excluding those who are privy to such information for standard of care purposes);
- * Research related message left for subject at contact not on approved list.

Unresolved Subject Complaint

- * Complaints regarding any and all study related procedures;
- * Includes complaints to IRB about study;
- * EXAMPLE: A potential subject views recruitment materials offensive and reports the offense to the IRB. The IRB will contact the PI to submit a report.
- * EXAMPLE: A subject feels he/she is being treated unfairly by research team members and complains to the site leader. The PI should submit a report.

Incarceration of Subject Study not Approved to Involve Prisoners

- * Prisoner means any individual involuntarily confined or detained in a penal institution.
- * The term is intended to encompass individuals sentenced to such an institution under a criminal or civil statute, individuals detained in other facilities by virtue of statutes or commitment procedures which provide alternatives to criminal prosecution or incarceration in a penal institution, and individuals detained pending arraignment, trial, or sentencing (45CFR46.303 (c)).

Unanticipated Adverse Device Effect

- * Any serious adverse effect on health or safety or any life-threatening problem or death caused by, or associated with, a device, if that effect, problem, or death was not previously identified in nature, severity, or degree of incidence in the investigational plan or application (including a supplementary plan or application), or any other unanticipated serious problem associated with a device that relates to the rights, safety, or welfare of subjects (21 CFR 812.3(s)).

Suspension or Premature Termination by the Sponsor, Investigator, or Institution

- * In addition to the report, submit any and all supporting documents including any plans for follow up of subjects.

Terminated

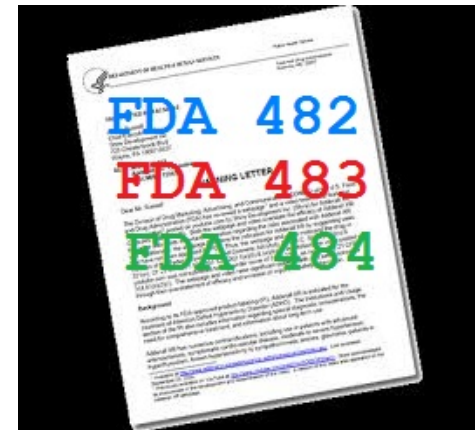
Audit, Inspection, or Inquiry by a Federal Agency

- * Including OHRP, FDA, DOJ, DOE, DOD, or other regulatory bodies;
- * Submit copies of all notices, findings, and reports.



Written Reports from a Federal Agency

- * Including OHRP, FDA, DOJ, DOE, DOD or other regulatory bodies;
- * Submit any determinations (OHRP), forms (FDA 482, 483), or other findings or reports.



State Medical Board or Hospital Medical Staff Actions

- * Including suspension or termination of any medical, nursing, or other licenses approved by state or local authorities;
- * Any actions taken by agencies that govern health care workers and agencies.

What Else?



Other information that the sponsor/CRO has directed the PI to report to the IRB, even if not on this list.

EXAMPLE: Monitoring reports; External events requiring notification to subjects; Promptly reportable interim findings.

What if Something Else Occurs?

- * Maintain and submit a deviation log at time of continuing review.

Date of Event	Description of Event	Corrective Action	Preventive Action

Questions??

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