

<p>MD Anderson HRPP Policy Guidance</p>	<p>Events and Information that Require Prompt Reporting to the IRB</p>	<p>THE UNIVERSITY OF TEXAS MDAnderson Cancer Center Making Cancer History®</p>
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This guidance applies to all non-exempt human subject research and details events or circumstances that must be **promptly** reported to the IRB during the conduct of human subject research. "Prompt reporting" is done using the applicable form (i.e. deviation form, violation form, unanticipated form, etc.) in Protocol Document On Line (PDOL) system.

Events and information which require prompt reporting to the IRB

1) Unanticipated Problems Involving Risks to Participants or Others (UPs)

Events (internal or external, deaths, life-threatening experiences, injuries, or other) occurring during the research study, which in the opinion of the Monitoring Entity or the PI meet **all** of the following criteria:

a) Unexpected

in terms of nature, severity, or frequency, given (a) the research procedures described in the protocol-related documents, and (b) the characteristics of the subject population being studied;

AND

b) Related to participation in the research

or there is a reasonable possibility or likelihood that the incident, experience, or outcome may have been caused by the procedures involved in the research;

AND

c) Harmful

the research places subjects or others at a greater risk of harm (including physical, psychological, economic, or social harm) than was previously known or recognized.

NOTE:

- A "UP" generally will warrant consideration of substantive changes in the research protocol or informed consent process/document, or other corrective actions, in order to protect the safety, welfare, or rights of subjects or others.

2) New Information that indicates a change to the risks or potential benefits of the research in terms of severity or frequency or impacts the subject's willingness to participate (e.g., DSMB, other safety information or publication, suspension or premature termination by the sponsor or investigator).

3) Noncompliance: An action or activity in human subject research at variance with the approved IRB protocol, other requirements and determinations of the IRB, the HRPP Policy Manual and other applicable policies of MD Anderson, or relevant state or federal laws.

When the event is:

- Possibly serious
 - Noncompliance that affects the rights or welfare of human subject research participants.
- Possibly continuing
 - A pattern of noncompliance that continues to occur after a report of noncompliance and a corrective action plan has been reviewed and approved by the IRB, after an investigator has been warned to correct errors or noncompliance, or a circumstance in which an investigator fails to cooperate with investigating or correcting non-compliance.

4) Complaint unresolved by the research team

- 5) **Incarceration** when in the opinion of the Principal Investigator it is in the best interest of the participant to remain on the study. Please note that the MD Anderson IRB will not be the IRB of record for the incarcerated participant.
- 6) **Unanticipated adverse device effect (UADE)**
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\(s\)](#)
More guidance on [UADE](#)
- 7) **Other events or information**
Examples include: a deviation intended to eliminate an immediate hazard to a participant, suicide or suicide attempt of a participant, other Audit or Monitoring Visit reports and Corrective Action Preventative Action (CAPA) plans.

How to Submit a Report; Timeframes

- **Submit to IRB** using appropriate PDOL Report Form
- **Timeframe for UP reports depends on Monitoring Entity***
 - **If PI is the only monitoring entity**
Items 1 - 6 should be reported **directly** to the IRB **within 10 working days** from when the PI learns of the event or new information.
 - **If there is a monitoring entity in addition to, or other than, the PI**
Report to the IRB using this form **within 10 working days** from receiving assessment from monitoring entity. The PI should report to the IRB when the event has been assessed by the monitoring entity to be a UP.
 - **Timeframe for Reportable Information (items 2 - 7)**
These should always be reported by the PI **directly** to the IRB **within 10 working days** from when the PI learns of the event or new information.
 - **Unexpected deaths or life-threatening experiences** related to the research (at MD Anderson, or when MD ANDERSON is the coordinating institution in a multi-site study) must be reported to the IRB **within 10 working days** from PI learning of event.

Definitions

1. **Protocol-related documents** refer to the IRB-approved research protocol, informed consent document, investigator brochure, protocol, package insert, or label.
2. **Characteristics of the subject population being studied** refers to the expected natural progression of any underlying disease, disorder, or condition of the subject(s) experiencing the adverse event and the subject's predisposing risk factor profile for the adverse event.
3. **Related to participation in the research** - In general if event is determined to be caused at least partially by the procedures involved in the research it would be considered *related* to participation in the research; if caused solely by an underlying disease, disorder, or condition of the subject, or other circumstances unrelated to either the research or any underlying disease, disorder, or condition of the subject it would be considered *unrelated* to participation in the research.

4. **Adverse events** need not be “serious” to qualify as “harmful”. However, “serious adverse events” always meet the “Harmful” criterion.
5. **Serious adverse event** only needs to be reported promptly if it is also a UP. An SAE is defined by OHRP as an event that:
 - results in death;
 - is life-threatening (places the subject at immediate risk of death from the event as it occurred);
 - results in inpatient hospitalization or prolongation of existing hospitalization;
 - results in a persistent or significant disability/incapacity;
 - results in a congenital anomaly/birth defect; or
 - based upon appropriate medical judgment, may jeopardize the subject’s health and may require medical or surgical intervention to prevent one of the other outcomes listed in this definition
6. **“Not serious” adverse events might also be UPs:** adverse events that are not serious could also be unanticipated problems if they suggest that the research places subjects or others at a greater risk of physical, psychological, economic, or social harm than was previously known or recognized, e.g. a privacy breach.
7. **FDA-regulated drug studies:** See definitions in FDA regulations at [21 CFR 312.32\(a\)](#).

Resources: Regulations and Guidance	
OHRP	<ul style="list-style-type: none"> • 45 CFR 46.103 (b)(5) • Reviewing and Reporting UPs Involving Risks to Subjects or Others and Adverse Events - Guidance
FDA	<ul style="list-style-type: none"> • 21CFR 812.150 Investigational Device – reports • 21 CFR 312.32(a) Investigational New Drug – safety reports • Adverse Event Reporting to IRBs - Improving Human Subject Protection – Guidance • Safety Reporting Requirements for INDs and BA/BE Studies – Guidance • Safety Reporting Requirements for INDs and BA/BE Studies – Small Entity Compliance Guide
Resources: Other References	
MD Anderson HRPP	<ul style="list-style-type: none"> • Chapter 3.10 Unanticipated Problems Involving Risks to Participants or Others (UPs), and Other Reportable Information • Unanticipated Adverse Device Effect (UADE)

REVISIONS

Date	Action	Initials	Description
11/1/2018	New	MT	Created new document
6/26/2019	Rev	JH	Revised document to take out extra page fix formatting; revised reporting timeframes