

DHS-Public Health Division

REPORTS OF UNANTICIPATED PROBLEMS AND ADVERSE EVENTS

Any unanticipated problems or adverse events involving risks to research subjects as a result of their participation in the study must be reported to the IRB.

Definitions

- Anticipated means previously known or expected as a result.
- Unanticipated means not previously known or expected (including increases in severity or frequency.)
- An unanticipated problem is an event that is not expected given the nature of the research procedures and the subject population being studied and is related or possibly related to an individual's participation in the research. The event may place individuals at increased risk of harm or discomfort (including physical, psychological, economic or social harm) related to the research than was previously known or recognized. (Example: events that could lead to a breach of confidentiality such as an unanticipated loss or theft of files constitutes an unanticipated problem.)
- An adverse event is any untoward or unfavorable medical occurrence, although not necessarily unexpected, in a research participant including any abnormal sign, symptom, or disease temporally associated with the individual's participation in the research. Adverse events encompass both physical and psychological harm.
- A serious adverse event is any adverse event that:
 - Is fatal or life-threatening;
 - Is persistent or significantly disabling or incapacitating;
 - Results in inpatient hospitalization or prolongation of hospitalization;
 - Results in psychological or emotional harm requiring treatment;
 - Creates a persistent or significant disability;
 - Causes a congenital anomaly or birth defect and/or;
 - Results in a significant medical incident (considered to be a serious study related event because, based upon appropriate medical judgment, it may jeopardize the subject and may require medical or surgical intervention to prevent one of the outcomes listed in this definition.)

Investigator Action

The Principal Investigator must:

- Analyze and review all unanticipated problems and adverse events to determine the accuracy of the report, determine the appropriate action to be taken in response to the event or problem; and
- Report the problem or event to the IRB using the Unanticipated Problem Report form within the time frames specified below.

What is reportable?

Principal investigators should consider the following information to determine if an event is reportable:

- Review of the Unanticipated Problem Analysis Chart which can be obtained on the web at www.oregon.gov/DHS/ph/irb.
- Was there a description of the known or foreseeable adverse events and risks in the IRB-approved research protocol, any applicable investigator brochure, the IRB-approved consent form, or other relevant sources of information;

- Consider any underlying disease or conditions of the subject experiencing the adverse event; and
- Conduct a careful assessment of whether the adverse event is related or possibly related to the subject's participation in the research.

When to report

All unexpected problems and adverse events that meet the definitions (as determined by the principal investigator, unless otherwise determined by the IRB) must be reported by the investigator to the IRB within the following time frames:

- Fatal or potentially life-threatening unexpected problems must be reported to the IRB within five (5) working days after the investigator learns of the event. If it is determined that a change is required to the protocol or consent form due to the event(s), changes must be made promptly by the investigator and revised documents submitted to the IRB.
- All other unexpected problems must be reported to the IRB within fifteen (15) working days. If it is determined that a change is required to the protocol or consent form due to the event(s), changes must be made promptly by the investigator and revised documents submitted to the IRB.
- A brief summary of unexpected problems as well as a brief summary of all adverse events must be submitted with the continuing review using the Event Summary Annual Report form which can be obtained from the web at www.oregon.gov/DHS/ph/irb.
- The IRB may request a report or additional information at any time it deems necessary.

IRB Review of Submitted Unanticipated Problems

- Unanticipated event reports will be submitted by investigators using the Unanticipated Problem Report form to the IRB Coordinator.
- Upon receipt of the report, the IRB Coordinator will send the report to the IRB Chair or Vice-Chair by E-mail. The Chair or Vice-Chair will review or have a designee review the report and the response plan, including any proposed modifications and determine whether any action is necessary. Possible actions may include but not limited to termination of the study, suspension of the study until corrective action is taken, or other actions as determined by the IRB.
 - Proposed modifications that are minor may be reviewed by expedited review;
 - Proposed modifications that are more than minor or are otherwise not approvable by expedited review will be referred to the full board for review and further action. Initial review of the report by the full board will occur via E-mail, and a follow-up discussion will be scheduled at the next IRB meeting; or
 - The Chair or Vice Chair may refer any report or proposal to the full IRB for further review and action. This may occur by E-mail with a follow-up discussion scheduled at the next IRB meeting.
- Serious or potentially life-threatening serious adverse events will be reviewed within five working days of receipt of report.
- Reports may be accepted as submitted with no further action necessary if no modifications are proposed and the IRB Chair, Vice Chair and/or designee agrees.
- If the IRB Chair, Vice Chair and/or designee indicates that modifications are required based on the information submitted, the IRB Chair or Vice Chair will request in writing that the investigator discuss with appropriate parties (if applicable) and submit a response or the necessary modification.
- All reports of unexpected problems will continue through appropriate IRB review procedures

until the reports and any applicable modifications are approved or disapproved.

Modifications that are disapproved by the IRB may be appealed.

- The IRB may require additional information be submitted by the investigator, DSMB, sponsor, or study coordinating center on any event or unanticipated problem.
- The IRB will report any unanticipated problems to the FWA signatory official and the Office for Human Research Protection or other institutions based on funding source.

Applicable Regulations:

45 CFR 46.103(5)

21 CFR 56.108(b)