

University of Kentucky

Policy on Prompt Reporting

For Unanticipated Problems, Serious or Life-Threatening Events, and Anticipated or Unanticipated Related Deaths to the Institutional Review Board (IRB) and Institutional Biosafety Committee (IBC)

For All VA Internal Serious Unanticipated Problems and Serious Unanticipated Adverse Events see the Internal Unanticipated/Anticipated Problem/Adverse Event Reporting SOP

Introduction

This policy details the IRB and IBC requirements for reporting an unanticipated problem involving risk to subjects or others, serious or life-threatening adverse events, and anticipated or unanticipated related deaths. This policy applies to all research projects falling under the purview of the University of Kentucky IRB and/or IBC.

Review of unanticipated problems/events that meet the requirements for prompt reporting serves to evaluate the risk-benefit ratio of research and determine if modifications to the study and/or the consent process are needed to provide additional human research protections. The Committees that may review the reports are identified below:

1. The **UK Institutional Review Boards** (UK IRB) are responsible for ethical review of research activities involving human subjects.
2. The **UK Institutional Biosafety Committee** (IBC) shares this responsibility for research activities involving biohazardous research materials, including biological materials (i.e., infectious agents or recombinant DNA materials).

The IRB or IBC can request more stringent reporting requirements for individual research studies if the respective committee determines it to be necessary.

Prompt Reporting Timelines

1. All problems/adverse events that are serious or life-threatening (involving risk to subjects or others), AND unanticipated AND which are related^{*}, to the study procedures must be reported, using the applicable UK Internal/External Prompt Reporting Form, within the following timeframes:
 - 1a. If the event involves unanticipated life-threatening experiences, the event must be reported within 7 calendar days of the investigator's receipt of the information.
 - 1b. All other serious and unanticipated events/problems must be reported within 14 calendar days of the investigator's receipt of the information.
 - 1c. Follow-up reports on serious or life-threatening and unanticipated and related^{*} events should be reported within 14 calendar days of the investigator's receipt of information.
2. All unanticipated deaths and anticipated deaths related^{*} to the study procedures occurring during a research study must be reported using the appropriate UK Internal/External Prompt Reporting Form according to the following timeframes:
 - 2a. If the death is related to the study procedures it should be reported immediately (i.e. within 48 hours) by the investigator upon receipt of the information.
 - 2b. If the death is not related to the study procedures (i.e., due to underlying disease progression), the death must be included in the summary of problems/adverse events submitted to the IRB at the time of continuation review in the designated summary format (per the instructions provided in the Continuation Review report form). Refer to UK's "Policy on IRB Continuation Review Reporting".
3. If an event does not fall under the IRB's prompt reporting requirements, but in the **PI's** judgment, prompt reporting of the event(s) is in the best interest of the subject(s) (e.g., because it may affect the safety and/or welfare of subjects; or it changes the risk level of the study; or the frequency of the same event significantly increases) the PI should submit the appropriate UK Internal/External Prompt Reporting Form according to the applicable timeline for prompt reporting.

* If there is insufficient information to determine if the *internal* event is related, it should be reported as if it is related. If there is insufficient information to determine if the *external* event is related, it does not need to be reported until Continuation Review (CR) time.

University of Kentucky

Any problems/adverse events that were initially determined to not be related to the study procedures and are subsequently determined related must be reported according to the requirements listed in items 1-3 above.

Policy on Non-Prompt Reporting

Anticipated Problems/ Anticipated or Unanticipated Unrelated Deaths to the IRB
(Required by Sponsor but not by UK)

1. Problems/Events Not Requiring Prompt Reporting to the IRB include:
 - o *anticipated* problems or adverse events whether or not serious or life-threatening (including IND safety reports)
 - o unanticipated or anticipated death *not related* to the research (e.g., due to underlying disease)(including IND safety reports)

These types of reports should be reviewed and dated by the Principal Investigator and filed in the PI's research records.

2. If the sponsor requires the PI to submit reports of this type to the IRB that do not require prompt reporting according to UK's policy, the PI may provide the sponsor with a letter of explanation about the UK IRB policy on review of events. Go to http://www.research.uky.edu/ori/human/IRBReviewTypes.htm#UP_AE for the "letter for sponsors". If the sponsor, after receiving the letter, still requires the PI to submit reports to the IRB that do not require prompt reporting according to UK's policy, the PI may complete the "Cover Form for Non-Prompt Reporting of Problems/Events". Go to http://www.research.uky.edu/ori/human/IRBReviewTypes.htm#UP_AE for the cover form.

Policy on IRB Continuation Review Reporting

For any Problems or Adverse Events

1. At the time of IRB Continuation Review, if any problems or adverse events occurred within the last 12 months, a summary of **all** problems/adverse events involving subjects whether anticipated or unanticipated, serious or not serious, life-threatening or not life-threatening, or related or not related, must be submitted to the IRB in the designated summary format (per the instructions provided in the Continuation Review report form).

Definitions

For definitions applicable to VA research, see the VA Research Internal Prompt Reporting Form.

- **Unanticipated problem** - any unforeseen or unexpected incident or experience (including an unanticipated adverse event) which is not described in the general investigational plan or elsewhere in the current application or with the current investigator brochure, or in the consent document.
- **Adverse event** – an undesirable effect detected in participants in a study. The effect may be the result of:
 - (a) the interventions and interactions used in the research;
 - (b) an underlying disease, disorder, or condition of the subject; and/or
 - (c) other circumstances unrelated to the research or any underlying disease, disorder, or condition of the subject.
- **Unanticipated problem involving risk to subjects or others** - any unforeseen or unexpected event or experience that adversely affects the rights, safety, or welfare of subjects or others (which is not described in the general investigational plan or elsewhere in the current application or with the current investigator brochure, or in the consent document). The event or experience could involve physical harm/risk (e.g., adverse event), social harm/risk (i.e., inappropriate breach in confidentiality, harm to a subject's reputation, or invasion of privacy), psychological harm/risk or legal harm/risk. The experience could also involve events not previously identified in severity or degree of incidence. An adverse event could be considered an "unanticipated problem involving risk to subjects or others".
- **Anticipated problem/adverse event** – any foreseen or expected incident/experience which was described in the general investigational plan or elsewhere in the current application or with the current investigator brochure, or in the consent document.
- **Serious problem/adverse event** - any incident that results in significant harm to or increased risk for the subject or others. Examples of events which are serious would include but are not limited to, inpatient

University of Kentucky

hospitalization or prolongation of existing hospitalization, a persistent or significant disability/incapacity, or a congenital anomaly/birth defect. Important medical events that may not result in death, be life-threatening, or require hospitalization may be considered a serious adverse event when, based upon appropriate medical judgment, they may jeopardize the subject’s health or welfare and may require medical or surgical intervention to prevent one of the outcomes listed in this definition. Examples of such medical events include allergic bronchospasm requiring intensive treatment in an emergency room or at home, blood dyscrasias or convulsions that do not result in inpatient hospitalization, or the development of drug dependency or drug abuse. A disability is a substantial disruption of a person’s ability to conduct normal life functions.

- **Life-threatening event** - any experience that places the subject, in the view of the investigator, at *immediate* risk of death from the reaction as it occurred, i.e., it does not include a reaction that, had it occurred in a more severe form, might have caused death.
- **Related*** - There is a reasonable possibility, in the opinion of the Principal Investigator, that the experience was more likely than not to have been caused by the research procedures.
- **Internal event/problem** – occurrence involves research subjects enrolled in a project approved by the University of Kentucky IRB and directed by a principal investigator employed by the University of Kentucky or one whose project is under the purview of the University of Kentucky IRB. [UK internal events/problems are reported to the IRB/IBC on the “UK INTERNAL PROMPT REPORTING FORM for Unanticipated Problems, Serious or Life-Threatening Events, and Related Anticipated and Unanticipated Deaths”. VA internal events/problems are reported to the IRB on the “VA RESEARCH INTERNAL PROMPT REPORTING FORM for Unanticipated Problems, Serious or Life-Threatening Events, and Anticipated and Unanticipated Deaths”.]
- **External event/problem** - occurrence involves research subjects enrolled in multi-center research projects that do not fall under the purview of the University of Kentucky IRB. [External events/problems are reported to the IRB on the “UK EXTERNAL PROMPT REPORTING FORM For Unanticipated Problems, Serious or Life-Threatening Events, and Related Anticipated and Unanticipated Deaths”.]

Examples of reportable events are below.

	Incident	Examples
Prompt Report to the IRB Required	A) Unanticipated problem involving risk to subjects or others, and related	sensitive data with identifiers stored on a computer which is stolen
	B) Unanticipated, serious/life-threatening related event	renal failure occurs after administration of study drug – no mention of risk in protocol
	C) Anticipated or unanticipated related death	Any death related to the research
Prompt Reporting to the IRB NOT Required	D) Unanticipated problem	Subject talks to the press about the study
	E) Adverse Event	nosebleed common from nasal spray administered as part of study – mentioned as risk in protocol
	F) Unanticipated adverse event	subject is passenger in car accident and breaks a leg