University of Kentucky

IRB Policy on Unanticipated Problem and Safety Reporting

The University of Kentucky Institutional Review Board (IRB) and Institutional Biosafety Committee (IBC)* require Principal Investigators (PI) to promptly report the following events using the applicable UK Internal *or* External Prompt Reporting Form:

EVENT	TIMELINE
• ***An Unanticipated problem involving risks to subjects or others (UPIRSO)-*** includes any incident, experience, or outcome that meets **all** of the following criteria: 1. ***Unexpected*** (in terms of nature, severity, or frequency) given (a) the research procedures that are described in the protocol-related documents, such as the IRB-approved research protocol and informed consent document; and (b) the characteristics of the subject population being studied; 2. ***Related or possibly related*** to participation in the research; and 3. ***Suggests that 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. • An adverse event (AE) or **unanticipated adverse device effect (UADE)** could be considered an "unanticipated problem involving risks to subjects or others". For additional guidance see the FDA Guidance for Clinical Investigators, Sponsors, and IRBs.	If the event is life-threatening or an unanticipated adverse device effect (UADE), report within **7 calendar days** of receipt of the information. Follow-up reports for these events should be submitted within **14 calendar days** of receipt of information All other events/problems must be reported within **14 calendar days** of the investigator's receipt of the information
• ***All Research-Related Deaths*** (whether anticipated or unanticipated)	Immediately (i.e. within 48 hours) upon receipt of the information
• ***Other event that in the PI's judgment, warrants reporting or is in the best interest of the subject(s)*** (e.g., because it may affect the safety and/or welfare of subjects; it changes the risk level of the study; or the frequency of the same event significantly increases)	If life-threatening, report within 7 calendar days of receipt of the information. All other events/problems must be reported within 14 calendar days of the investigator's receipt of the information.
• ***Other unanticipated problems that impact safety or the conduct or integrity of the study*** (e.g., FDA Clinical hold or recall, sponsor suspends study or subject enrollment, published literature or data and safety monitoring board report impacting risk-benefit ratio, investigator medical license restriction or suspension, participant is incarcerated)	If life-threatening, report within 7 calendar days of receipt of the information. All other events/problems must be reported within 14 calendar days of the investigator's receipt of the information.
• ***Allegations or compliance actions including:*** 1. **Negative actions by a government oversight office**, including, but not limited to, FDA 483 inspection report, FDA Warning letter, OHRP Determination letter, or other agency compliance action related to human research protections. 2. **Lawsuits related to human research protections.** 3. **Press coverage** (including, but not limited to radio, TV, Newspaper, Online) of a compliance allegation or negative nature regarding UK Human Research Protection Program.	Within 24 hours of being notified or becoming aware.

*The IBC shares this responsibility for research activities involving biohazardous research materials, including biological materials (i.e., infectious agents or recombinant DNA materials).

Sponsor Reporting Requirements

If the sponsor requires the PI to submit reports to the IRB that do not meet the prompt reporting criteria above, the PI may submit the "IRB Cover Form for Non-Prompt Reporting of Problems/Adverse Events" available at: https://www.research.uky.edu/uploads/ori-f110000-non-prompt-reporting-form-pdf. However, upon review, the IRB may request additional information, including but not limited to questions from the Internal Prompt Reporting Form.

The majority of IND Safety Reports, MedWatch Reports, and CIOMS Reports **may not need to be submitted** to the UK IRB. The only Reports that must be submitted are those that qualify as unanticipated problems involving risks to subjects or others (meeting criteria above).

Policy on IRB Continuation and Annual Administrative Review Reporting

At the time of Continuation or Annual Administrative Review, the PI submits a written summary of both unanticipated problems and available information regarding adverse events since the last IRB initial, continuing, or annual administrative review. For multisite studies, the written summary should describe external events determined to be unanticipated problems involving risks to subjects. The amount of detail provided in such a summary will vary depending on the type of research being conducted; in many cases, such a summary could be a brief statement that there have been no unanticipated problems and that adverse events have occurred at the expected frequency and level of severity as documented in the research protocol, the informed consent document, and the investigator's brochure (if applicable). The summary must include the PI's assessment whether the problems/adverse events warrant changes for the protocol, consent process, or risk/benefit ratio (per the instructions provided in the Continuation and Annual Administrative Review Report Form).

Definitions

- **Adverse event** - Any untoward or unfavorable medical occurrence in a human subject, including any abnormal sign (for example, abnormal physical exam or laboratory finding), symptom, or disease, temporally associated with the subject's participation in the research, whether or not considered related to the subject's participation in the research. Adverse events encompass both physical and psychological harms.

- **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.

- **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** - In the opinion of the Principal Investigator, the experience was caused or possibly caused by the research procedures. If there is insufficient information to determine whether the *internal* event is related, it should be reported as it is related.

- **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".]

- **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".]