Adverse Event and Unanticipated Event Reporting

A. Purpose

This procedure outline QMC's RIRC requirement for Adverse Event Reporting for research studies.

B. Definitions

Associate with the use of a test article: There is a reasonable possibility that the experience may have been caused by the test article.

Adverse Events: An adverse event is any injury, trauma, or illness experienced by a subject that required medical or psychological treatment.

Refer to definitions provided in the OHRP Guidance Document "Guidance on Reviewing and Reporting Unanticipated Risks to Subjects or Others and Adverse Events". http://www.hhs.gov/ohrp/policy/advevntguid.pdf.

A serious adverse event (SAE) is any adverse event that

a. Results in death
b. Is life-threatening (places the subject at immediate risk of death from the event)
c. Results in inpatient hospitalization or prolongation of existing hospitalization
d. Results in a persistent or significant disability/incapacity
e. 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

An unexpected adverse event is any adverse event occurring in one or more subjects participating in a research protocol, the nature, severity, or frequency of which is not consistent with either:

a. The known or foreseeable risk of adverse events associated with the procedures involved in the research that are described in the protocol-related documents, such as the IRB-approved research protocol, any applicable investigator brochure, and the current IRB-approved informed consent document, and
b. Other relevant sources of information, such as product labeling and package inserts; or
c. 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.

Unanticipated Problems Involving Risks to Subjects or Others

a. 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

b. Related or possibly related to participation in the research (in this guidance document, *possibly related* is defined as there is a reasonable possibility that the incident, experience, or outcome may have been caused by the procedures involved in the research) and
c. Suggests that the research places subjects or others at a greater risk of harm (including physical, psychological, economic, or social harm) than was previously know nor recognized.

C. Initial Reporting

All investigators conducting research with human subjects must make the initial determination that the event is an unanticipated problem involving risk to others. Unanticipated problems, serious and unexpected adverse events are required to be reported to the sponsor and the RIRC. Safety Reports about the occurrence of adverse events are required for all research studies on human subjects. If new information becomes available as a result of an adverse events, the investigator is required to submit the new information for RIRC review for possible inclusion in the consent form or additional deliberation by the RIRC An adverse event is "related to the research" if in the opinion of the principal investigator, it was more likely than not related to the investigational agent(s) or intervention. If there is any doubt, then the event needs to be reported to the IRB.

1. All serious adverse events occurring on QMC RIRC approved research study subjects must be reported by the investigator to the RIRC as soon as possible or within 3-5 days.
2. Any death must be reported within 24 hours of the investigator/staff becoming aware of it.
3. The timeframe for the investigator to report adverse events to the sponsor varies. Sponsors define the timeframe for reporting adverse events in the written contract or protocol with investigators. Investigators and research staff need to be cognizant of these requirements
4. Sponsor-generated safety reports must be submitted to the RIRC within 30 days of their receipt by the investigator.
5. The RIRC should be notified as soon as possible of complaints by research subjects, subject's families, staff or other persons regarding concerns about the research study.

D. Reporting at Continuing Renewal

Upon submission of a continuing renewal, investigators shall provide the RIRC with information including the number of SAEs with a brief description of the SAE/unanticipated events, and include the number of deaths.

E. Submission Format

Investigators and research staff are requested to use the current Medwatch form for all submissions of adverse events/unanticipated events except for the reports submitted by the sponsor. Information includes, but is not limited to:

a. The IND/IDE number

b. A number or coding for subject
c. A descriptive narrative of the event including listing all concurrent drugs, diagnostic tests results if appropriate.
d. A description narrative of any action taken as a result of the event
e. A statement as to whether the investigator feels the event was:
    a. Definitely related to the subject's participation in the research
    b. Probably related
    c. Possibly related
    d. Unlikely remote or
    e. Definitely not related.
f. A statement as to whether the consent form has to be modified to incorporate the adverse event

F. Reporting within RIRC

Adverse event/unanticipated event reports are inputted into an electronic database by the RRO staff. Two types of reports are generated:

1. Reports are generated monthly or less frequently depending on submission of reports for review by RIRC in general
2. Reports may be generated for research protocols for continuing renewal.

G. Acknowledgement to the Principal Investigator

A copy of the first page of the report with RRO date stamp and initial of RIRC Chairman is provided as acknowledgement receipt.