

Understanding Reportable Events and When to Report to the RSRB

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What is a Reportable Event?

- An event that occurs during a research study that requires reporting to the...
 - RSRB
 - FDA
 - Sponsor
- Characteristics of the event will determine the timing of the reporting

What Characteristics are Important??

SUBJECT SAFETY IS KEY

- Was it Serious? Was subject(s) at risk?
 - Death, hospitalization, life threatening, important medical event, put subjects at risk
- Was it Anticipated or Expected?
 - Is it in the consent form as a risk? Was it part of disease progression?
- Was it Related to the Study?
 - To the drug? to the study procedure? to being in the study?

Submitting a Reportable Event in ROSS

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Type 1 – Serious Adverse Event

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- A locally occurring “serious adverse event”
- To meet the criteria for a TYPE 1 must be...
 - Serious
 - Unexpected
 - Related
- AND occur at the University of Rochester – “locally” occurring

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Type 1 – SERIOUS Adverse Event

- **Serious, unexpected** and **related** – report to RSRB within 10 calendar days
- If an event does not meet **ALL THREE**, should be summarized and reported at the continuing review.
 - Use Data and Safety Monitoring Plan as the structure to report in the progress report
 - Refer to “Guidance for Reporting Reportable Events to the RSRB” on RSRB website

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Type 2 – Batched Reporting

- Batched reporting of non-local adverse events
 - Excel spreadsheets of non-local adverse events
 - PDFs of several IND Safety reports
- Currently, the system allows these to be submitted...but not for long

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Type 3 – Not in Use



Type 4 - UPIRTSO

An unanticipated problem involving risks to subjects or others that occurs in a UR study or that impacts UR subjects or conduct of the UR study

- **U**nanticipated
- **P**roblem
- **I**nvolving **R**isk
- **T**o **S**ubjects or **O**thers - (e.g., the study team, relatives, the “community” etc.)

UPIRTSOs

- Remember: the definition of serious can be broad, especially when dealing with behavioral or non-medical studies
- Think of the seriousness of the event and consider the risk i.e. disclosure of information

Type 5 – Monitoring Body Report

- Data Safety Monitoring Board – DSMB
- Data Monitoring Committee – DMC
- Submit the report when you receive it:
 - If the report will generate an amendment, submit the report through the amendment form
 - If not, submit as a reportable event

Type 6 – New Information

- Receipt of new information (including changes in risks or benefits) that may impact the willingness of subjects to participate or continue to participate in the research study
- Source: Sponsor, published literature, case reports, another UR study
- New information of this type could need to be presented to all subjects (past, current, future).

Type 6 – New Information

- If the report will generate an amendment, submit the report through the amendment form
- Providing results
 - Type 6 can be used as a mechanism to obtain RSRB review when providing study results after a study has been closed.

Type 7 – Changes without Approval

- Changes made to the research without prior RSRB approval in order to eliminate apparent immediate harm
- If the report will generate an amendment, submit the report through the amendment form
- Type 7 used for a one-time change related to one situation or one subject

**REMEMBER THIS IS FOR SAFETY...
NOT PROTOCOL DEVIATIONS**

Type 8 – Non-Compliance

- An incident of non-compliance with the University’s policies or the requirements or determinations of the RSRB
- Use for an **Investigator’s self-report** of non-compliance with federal regulations or the requirements of the RSRB that affect the **RIGHTS, SAFETY, or WELFARE** of subjects or others.

Type 8 – Non-Compliance

- This is **NOT** to report an out of window visit, used the wrong survey, etc.
- This is to report non-compliance that affect the safety or welfare of the subject:
 - Consent issues (no consent, no signatures, wrong version)
 - Enrolling subjects who were not eligible
 - Drug dosing issues/Mis-randomizations
 - More radiation than was expected
 - Not performing safety assessments
 - Not following URMIC clinical procedures
 - Not following approved recruitment procedures

Type 9 – Voluntary Suspensions

- Investigator-initiated voluntary suspension of research
- May include suspension of all or part of a research study:
 - All study activities
 - Enrollment
 - Treatment
 - Certain arm or phase

Type 9 – Voluntary Suspensions

- Reasons to consider Voluntary Suspension:
 - Consider changes to the research
 - Investigate risks to subjects or others
 - Serious or continuing issues with non-compliance
- These reports keep the RSRB apprised of the status of approved research.
- NOT THE MECHANISM TO CLOSE A STUDY...this is performed through the continuing review process (submit progress report)

When to Report

- ASAP!!!
- Events that are Serious, Unexpected, and Related (type 1) and a UPIRTSO (type 4)
 - Submit within 10 calendar days from event/ knowledge of the event
- Deaths Related to the Study
 - **IMMEDIATELY** by telephone/fax with written follow up

Example #1

As a result of a calibration error, a subject enrolled in a clinical trial receives a radiation dose 10-times higher than the dose dictated by the approved protocol. What type of reportable event?

- 1) Type 1 - SAE
- 2) Type 4 – UPIRTSO
- 3) Type 8 – Non-compliance

Example #1

ANSWER – Type 4 (UPIRTSO)

This was unexpected problem and involved risks to the subject and possibly others if not identified and fixed.

The report should explain how this was fixed.

Example #2

A study has two consent forms, one for the experimental group and one for a control group. The experimental group receives an experimental drug treatment and the control group completes surveys and receives an x-ray. While the study team member explained the experimental aspect of the study to the subject, the subject signed the control consent. The subjects has completed 4 months of the study when this is identified.

- 1) Type 4 – UPIRTSO
- 2) Type 6 – New Information
- 3) Type 8 – Non-compliance

Example #2

ANSWER – Type 8 (non-compliance)

This is a non-compliance related to the subject’s rights as a research subject. While the subject may have understood what they were agreeing to based upon the consent process, the consent document does not support this. What should they do?

- Call your Specialist
- Document what happened
- Report to the RSRB
- Reconsent the subject

Example #3

An investigator is approved to collect individually identifiable sensitive information about illicit drug use and other illegal behaviors by surveying college students. The data was inadvertently stored on a laptop computer without encryption, and the laptop computer is stolen from the investigator's car in the Wegman's parking lot on the way home from work.

- 1) Type 4 – UPIRTSO
- 2) Type 6 – New Information
- 3) Type 8 – Non-compliance

Example #3

ANSWER – Type 4 (UPIRTSO)

This is a UPIRTSO because, it is unexpected, although within the realm of possibility, the investigators did not expect the theft; related because the data would not have been collected if not in the research; and (c) placed the subjects at a greater risk of psychological, social and legal harm from the breach in confidentiality of the study data.

What should they do?

- Document what happened
- Report to the RSRB/Privacy Officer

Example #4

A subject has an autoimmune condition and joins a study at the University of Rochester to test an investigational drug to treat his condition. After about 10 days on study drug the subject feels very sick and notices that his skin is turning yellow. The subject calls the study doctor, who instructs the subject to go directly to the emergency room. The subject is admitted to the hospital due to liver failure and remains in the hospital for 5 days. The Investigator's Brochure and the consent form do not mention anything about the drug affecting the liver's function, but the fact that it occurred after the drug started and then improved after the study drug was stopped leads the Investigator to think that this might be related.

- 1) Type 1 – local SAE
- 2) Type 4 – UPIRTSO
- 3) Type 6 – New Information

Example #4

ANSWER – Type 1 (local SAE)

What are the Key Words?

- University of Rochester = LOCAL
- Hospital 5 days = SERIOUS
- Not in IB/Consent = UNEXPECTED
- Maybe caused by the study drug = RELATED

Example #5

A study conducting a survey in adults over the age of 18 asks questions about physical features of the subject's parents (deformities, sex organs, etc.). The survey is mailed home and opened by the subject's parent (with permission). The parent becomes very upset and calls the researcher.

- 1) Type 4 – UPIRTSO
- 2) Type 6 – New Information
- 3) Type 8 – Non-compliance

Example #5

ANSWER – Type 4 (UPIRTSO)

This was unexpected problem and involved risks to the subject and others (parents).

The report should explain how this was fixed.

Example #6

After the administration of a reconstituted test vaccine at a University of Rochester study, a subject had to be hospitalized overnight for a fever spike. The Investigator Brochure and consent form both explain this risk. The Investigator feels that the fever was related to the administration of the vaccine.

- 1) Type 1
- 2) Type 4 – UPIRTSO
- 3) Type 6– New Information

Example #6

After the administration of a reconstituted test vaccine at a University of Rochester study, a subject had to be hospitalized overnight for a fever spike. The Investigator Brochure and consent form both explain this risk. The Investigator feels that the fever was related to the administration of the vaccine.

- 1) Type 1
- 2) Type 4 – UPIRTSO
- 3) Type 6– New Information



Example #6

ANSWER – DO NOT REPORT.

This is not a reportable event that requires immediate reporting. Record the event as required by the sponsor. This information will be reviewed according to your Data & Safety Monitoring Plan and reported to the RSRB at the time of continuing review

What are the Key Words?

- University of Rochester = LOCAL
- Hospital overnight = SERIOUS
- Info in IB/Consent = EXPECTED
- Maybe caused by the study drug = RELATED
