

KESSLER FOUNDATION

Policies and Procedures Manual *IRB*

SUBJECT: Submission of Reports of Adverse Events	POLICY # 5010
APPROVED:	EFFECTIVE DATE:
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PURPOSE

The purpose of this policy is to define procedures to comply with Federal Regulations (45 CFR 46.113) and (21 CFR Parts 310.305, 312-32, 312.64, 314.80, 314.81) which require that any serious adverse event experienced by a research subject be documented and reported promptly to the Institutional Review Board and/or Federal funding agency, sponsor or licensed manufacturer.

POLICY

Adverse Events that occur in the course of a research study must be documented and/or reported to Kessler Foundation IRB, Federal funding agencies or other sponsors as required, and the pharmaceutical or device company sponsor if applicable.

PROCEDURE

- I. **Reporting Requirements: Unexpected Adverse Events of Moderate or Greater Severity Associated with Study Intervention.**
 - A. Investigators must report to the IRB Administrator all UNEXPECTED adverse events of MODERATE OR GREATER SEVERITY associated with the study intervention.

- (1) Unexpected adverse events of moderate severity associated with the study intervention must be reported within five business days of the event's report to the study team using the UNEXPECTED Adverse Events REPORT form (attachment).
- (2) Unexpected adverse events that are serious must be reported within 24-48 hours (i.e. within one-two business days) of the event's report to the study team using the SERIOUS adverse Events Report form (attachment) – section II “Reporting Requirements: Serious Adverse Events (SAEs)”

An adverse event is considered to be UNEXPECTED if it is not identified in nature, severity or frequency in the current IRB-approved research protocol or informed consent document.

An adverse event is considered to be MODERATE OR GREATER SEVERITY if it requires medical evaluation (such as additional laboratory testing) and/or medical treatment; or if it is a serious adverse event (see above).

An adverse event is considered to be ASSOCIATED WITH THE RESEARCH INTERVENTION if there is a reasonable possibility that the event may have been caused by the research intervention, i.e. a causal relationship between the event and research intervention cannot be ruled out by the investigator(s).

An adverse event is considered serious if it: 1) is fatal or life-threatening; 2) results in persistent or significant disability/incapacity or congenital anomaly/birth defect; 3) results in or prolongs hospitalization; or 4) is a medical event which jeopardizes the patient or subject and may require medical or surgical intervention to prevent one of the outcomes listed above.

If there is doubt as to whether to file a report with the IRB, err on the side of caution and file a report. The Adverse Events REPORT form should be used for this purpose; all reports must be filed with the IRB Administrator within five (5) business days of its report to the study team.

II. Reporting Requirements: Serious Adverse Events (SAEs)

A. Investigators must report ALL Serious Adverse Events (expected/unexpected; associated or not associated with the research intervention) to the IRB Administrator, Federal and/or funding agencies or other sponsors as required.

- (1) Within 48 hours (i.e. within two business days) of the event's report to the study team using the SERIOUS Adverse Events Report Form (attachment)
- (2) Within 24 hours (i.e. within one business day) of the event's report to the study team for deaths

Written reports of serious adverse events must be completed and signed by the Investigator and submitted to the IRB Administrator on the SERIOUS Adverse Events Report Form:

- (1) A reasonable effort must be made to secure a copy of any relevant autopsy report and/or hospital medical records, which should be submitted for SAEs; files should be documented for the autopsy report/medical records request(s).

- (2) Copies of any SAE Report forms provided by the Investigator to the sponsor/FDA or other regulatory agencies should also be submitted simultaneously to the IRB.
- (3) Copies of all external SAEs (i.e. SAEs from other study sites) sent to the Investigator from the sponsor or other investigators for multi-site studies should be submitted to the IRB Administrator within 48 hours of receipt (i.e. within two business days).

Serious Adverse Event: A serious adverse event (SAE) is a regulatory term defined in the Code of Federal Regulations (CFR) Title 21 Part 312.32. SAEs are adverse events resulting in any of the following outcomes:

- Death
- Life threatening experience
- Persistent or significant disability/incapacity or congenital anomaly/birth defect
- Hospitalization or prolongation of existing hospitalization
- Medical events which jeopardize the patient or subject and may require medical or surgical intervention to prevent one of the outcomes listed above?

B. Review of SAE Reports by the IRB Committee

- Serious Adverse Events will be reviewed by the full IRB Committee
- Investigators may be requested to present an oral report of the serious adverse event to the Committee
- IRB Chair has the authority to suspend any study prior to its review by full IRB Committee

(1) The IRB Committee may take any of the following actions:

- a. Continuation of study without modification
- b. Continuation of study with modification
- c. Suspension pending investigation
- d. Termination of study

(2) Suspension pending investigation

The IRB Chairperson may appoint a qualified, licensed representative to investigate the SAE and to make further recommendations to the Committee.

(3) Reporting of studies which are suspended pending investigation or terminated

- a. The IRB Administrator will notify the appropriate institutional representatives, i.e., Senior Vice President for Research (Investigators affiliated with Kessler Foundation) and/or other designated officials of institutions for Principal Investigators who are not employees of Kessler Foundation.
- b. The IRB Administrator will report the suspension to the appropriate federal agencies as required.

III. Report Requirements: Other

A. Observational Studies:

On occasion, investigators may conduct observational studies that do not include a study intervention. Some of these studies record, over time, patients' symptoms, quality of life, and episodes of medical care. When events that fall into the definition of SAE are reported in these studies (e.g. hospitalization), they should not be considered adverse events of the study and should not be reported as such to the IRB. For the purpose of this Policy, an observational study is defined as one in which there is no therapeutic intervention and where the information obtained from subjects is limited to the use of questionnaires, interviews (in person or by telephone) and review of medical records. Studies that involve venipuncture, biopsies or other invasive procedures or radiological studies such as x-ray, CAT scan or MRI do not qualify as observational studies for the purpose of this Policy.

Observational studies can uncover potentially serious medical problems through interviews or questionnaires (e.g. symptoms of shortness of breath or chest pain, or suicidal ideation). When such potentially serious medical problems are uncovered, the investigators should refer the subject to an appropriate clinical specialist for evaluation. These potentially serious medical problems and their resolution should be reported to the IRB within 5 business days of their resolution, in the form of a memo, not as an adverse event of the study.

The principal investigator may submit a written request to the IRB for an exemption from adverse event reporting for a specific observational study. Only those protocols approved for an exemption in writing by the IRB will be exempt from submitting AEs and SAEs as stipulated in this Policy.

B. Procedure to ascertain new adverse events at each subject visit/contact:

During each subject visit, the Principal Investigator or his/her designee must ascertain if the subject has experienced an adverse event, and record the event on the Adverse Events LOG form (attachment). *The Adverse Event LOG is a cumulative record of all adverse events for the study: mild, moderate, serious; expected and unexpected; associated or unassociated with the study intervention; local site or other site of multi-center study.* Principal Investigators must submit the Adverse Events LOG(s) to the IRB on an annual basis during a protocol's continuing review and with its Termination Report.

C. HIPAA Requirements

Investigators are required to follow all HIPAA privacy rule regulations and other HIPAA requirements, as appropriate. Research forms and files, to the extent feasible, must be stripped of all protected health information (i.e., name, social security number, birth date); PIs must only transmit the "minimum necessary" information required.