RA-204 Adverse Event Reporting

1. **PURPOSE:**
   The purpose of this SOP is to ensure that adverse and serious adverse events of studies conducted at UTRGV are defined, recorded, reported, and evaluated as required by the UTRGV IRB and the ICH guidelines.

2. **SCOPE:**
   This SOP applies to all potentially related study events favorable and adverse, serious, non-serious, and unexpected that must be recorded in the research records.

3. **RESPONSIBLE INDIVIDUALS:**
   Research team members in contact with a subject are responsible for documenting events reported by the subject and making those known to appropriate staff (e.g., research coordinator, research nurse, Principal Investigator (PI), etc.). The PI is responsible for the accuracy, completeness, attributability, and timeliness of records and reports. The PI will review all reports before signature or transmission.

4. **RELATED TERMS AND DEFINITIONS:**

Adverse Drug Reaction (ADR)
Adverse Event (AE)
Case Report Form (CRF)
Clinical Research Organization (CRO)
External Event
Florence
Internal Adverse Event
Institutional Review Board (IRB)
Office for Human Research Protections (OHRP)
Serious Adverse Event (SAE)
Source Documents
Sponsor
Unanticipated or Unexpected Adverse Event
Unanticipated Problems Involving Risks to Subjects or Others (UPIRHSO): Examples of UPIRHSOs are as follows:

- A single occurrence of a serious, unexpected event that is uncommon and strongly associated with drug exposure or is uncommon in the study population
- An Adverse Event (AE) or Serious Adverse Event (SAE) that is described or addressed in the investigator's brochure, protocol, or informed consent documents, but occurs at a specificity or severity that is inconsistent with prior observations;
- Breaches in confidentiality, including the loss of data on a computer or any electronic device which holds private or confidential information, or which places the participant or others at risk;
- Laboratory or medication errors that may involve risk to that individual or others;
- Change in FDA labeling or withdrawal from marketing of a drug, device, or biologic used in a research protocol;
- Incarceration of a participant when enrolled in a study not approved under subpart C provisions;
- Allegations of noncompliance.

Please reference the Standard Operating Procedures Glossary of Terms for complete definitions of terms in this SOP.

5. POLICY STATEMENT:

UTRGV requires timely reporting of all adverse events outlined in this SOP.

6. PROCEDURES:

At each study visit, the Investigator or Study Coordinator will inquire if the subject has had any new clinical experience, exacerbation, and/or deterioration of any existing clinical condition since the last study visit.

- If the subject reports an AE, the research nurse or coordinator evaluates the event with the Investigator, who then must evaluate the seriousness of the event. If possible, the nurse or coordinator should discuss the event while the study subject is at the investigative site.
- If the event is not serious, the information is recorded in the study subject's source documentation, transcribed onto the adverse event Case Report Form (CRF), managed medically as appropriate, and then followed until resolution.
- If the Investigator determines that the adverse event is serious/ unanticipated problem, the coordinator reports this event to the Sponsor and IRB of record immediately upon becoming aware of it, or within their reporting requirements.
- The Investigator is responsible for reviewing all adverse event forms for determination of serious events that require reports to the Sponsor and IRB.

- The Study Coordinator will forward current information available on the event (hospital records, lab tests, discharge summaries, etc.) to the Sponsor, per protocol. As additional information becomes available it will be forwarded to the Sponsor, per protocol.
- The Study Coordinator will ensure that all reported AEs and SAEs are properly documented in the subject's chart and CRF, and that the appropriate forms are retained in the Regulatory Documents Binder.

Non-Serious Adverse Events (AEs): For reported AEs, the Study Coordinator or Investigator will document the following in the subject's chart and CRF:

- Date and time (if applicable) the event started and ended
- Description of the event
- Severity of the event
- Outcome of the event
- Action taken
- Relationship to study intervention. This must be determined by the PI or Treating Investigator on the study.

Serious Adverse Experiences (SAEs): The Study Coordinator should collect as much of the following information as possible for reporting to the Sponsor/Clinical Research Organization (CRO) and IRB of record:

- Subject number and initials
- Date of birth
- Subject demographics
- Date of the report
- Description of event, including relationship to study intervention (as determined by the PI or treating investigator)
- Determination of seriousness
- Possible cause of SAE other than research intervention (as determined by PI or treating investigator)
- Relevant medical conditions
- Concomitant medications
- Principal Investigator's name
- Name and telephone number of person reporting the event

For reported SAEs, notify the following people in the timeframes listed below:

- PI and Study Coordinator- immediately

- Sponsor/ CRO- in the timeframe stated in the protocol, but no later than 48 hours. If the SAE is life-threatening or a death, the sponsor/ CRO will be notified within 24 hours.
- IRB of record- immediately of the Investigator becoming aware of the event.

Internal Adverse Events

- Once aware of an internal adverse event, the Investigator will determine if the AE is unanticipated.
- If the Investigator deems the AE to be unanticipated, he/she must report the event to the IRB of record within 10 working days of the event.
- The Investigator must also report the AE to the monitoring entity (e.g., sponsor, CRO, etc.).
- If the Investigator determines that an AE is not unanticipated, but the monitoring entity does find the AE to be unanticipated, the monitoring entity will submit reports to the Investigator and the IRB of record.

External Adverse Events

The Investigator will be notified of external adverse events via reports by the sponsor or coordinating center of the multicenter clinical trial.
The investigator must acknowledge each of these reports with either a wet-ink signature or an electronic signature within Florence eBinders™.

7. REFERENCES:

- OHRP Guidance on Reviewing and Reporting Unanticipated Problems Involving Risks to Subjects or Others and Adverse Events (January 15, 2007)
- FDA Guidance Clinical Investigators, Sponsors, and IRBs Adverse Event Reporting to IRBs- Improving Human Subject Protection (January 2009)
- 21 CFR 312.32
- 21 CFR 56 Preamble
- 21 CRF 56.108(b)
- 21 CFR 612.34

8. FORMS OR ATTACHMENTS:

None