

# Reviewing and Reporting Unanticipated Problems

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## Purpose

Principal Investigators (PI) conducting research with human subjects are required to report all unanticipated problems involving risks to subjects or others to the Institutional Review Board (IRB). Events requiring prompt reporting to the IRB may involve physical, psychological, social, legal, or economic harms, and can occur in any type of research.

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## Policy Narrative

**An unanticipated problem is defined as any incident, experience, or outcome that meets all three of the following criteria:**

1. Unexpected (in terms of nature, severity, or frequency) given the research procedures that are described in the protocol-related documents and the characteristics of the subject population being studied
2. Related or possibly related to participation in the research (there is a reasonable possibility that the incident, experience, or outcome may have been caused by the procedures involved in the research)
3. Suggests that the research places subjects or others at greater risk of harm (including physical, psychological, economic, or social harm) than was previously known or recognized.

The primary investigator of research approved for the use of human subjects is responsible for reporting any adverse events or unanticipated problems <mailto:> as soon as possible, but no later than 7 days after first becoming aware of the problem. A report can be submitted through the online submission process by adding an Unanticipated Problem submission to the relevant protocol record (our system uses the term Unanticipated Problem rather than Adverse Event in the labeling of the specific submission needed). The principal investigator must independently begin initiation of any measures necessary to ensure subject safety while preparing and submitting the required reports. The report must contain sufficient information for the IRB to make an assessment of risk. The IRB may request additional information from the PI, which should be provided within one business week, or sooner if specified by the IRB.

**An adverse event is defined as:**

Any untoward or unfavorable medical occurrence in a human subject, including any abnormal sign, symptom, or disease, temporally associated with the subject's participation in the research, whether considered related to the subject's participation in the research or not. (The event can be physical and/or psychological.)

**The review process:**

A qualified IRB administrator will initially assess the report submitted by the PI with regard to the seriousness of the event and risks to subjects and will confirm that the event represents an unanticipated problem involving risks to the subjects or others. The IRB administrator may, as necessary, consult with the IRB chair in making this determination. If the administrator determines

that the report does not meet the three criteria in the definition of an unanticipated problem, then further review will not proceed. The PI will be notified of this decision.

If the event does meet the qualifications of an unanticipated problem involving risks to subjects or others, the event report will be reviewed by one or more IRB members, typically the Chair or Vice-Chair or member designated by the Chair. Upon receiving a report of an unanticipated problem or adverse event, the IRB reviewer(s) may take one or more of the following actions:

1. Acknowledge the report, with no changes to the informed consent and/or protocol necessary
2. Request additional information
3. Request changes to the informed consent and/or protocol in response to the report
4. Approve changes to the informed consent and/or protocol submitted by the PI in response to the report as long as these modifications are minor changes.
5. Refer the report to the next convened IRB meeting
6. The research study may be temporarily suspended and/or the research study procedures discontinued/terminated. The IRB has the authority to suspend or terminate its approval of a study. When practical, such action will be taken by vote of the members at a convened IRB meeting. In the case of an emergency, in order to protect the safety of the study subject(s) the IRB Chair or a Vice-Chair may suspend enrollment and/or any portion of a study without waiting for a convened meeting of the IRB; however, the Chair or a Vice-Chair may not terminate the study. In such cases, the IRB Chair (or Vice-Chair, as appropriate) will notify the IRB members of the suspension at the next regularly scheduled meeting of the IRB.

A suspension/termination may be appropriate for any of the following reasons:

1. Unexpected death or serious harm to a study subject
2. Unanticipated problems involving serious harm or risk of serious harm to a study subject, such as known or suspected contamination of a study drug or extreme psychological stress
3. Failure of the Principal Investigator to provide information requested by the IRB
4. Known or potential non-compliance of the Principal Investigator and/or a research team member with human subject regulations or the requirements or determinations of the IRB
5. Other circumstances that, in the judgment of the IRB, the IRB Chair, or a Vice-Chair necessitate suspension/termination to protect study subjects from harm

In all cases, in a timely manner the IRB Chair or Vice-Chair will inform the Principal Investigator in writing of the suspension/termination. The letter to the Principal Investigator must state the reason for the suspension/termination. In cases of immediate, significant risk to human subjects, the IRB Chair or designee may communicate the suspension/termination orally while written materials are prepared.

In the case of a suspension, the letter is to specify whether the suspension applies only to the enrollment of new subjects, or also requires the cessation of all study procedures on subjects who have already been enrolled.

In the case of a termination, no new subjects may be enrolled and all study activities involving enrolled subjects must cease. Exceptions may be made by the Chair or Vice-Chair in circumstances where subjects are receiving intervention that cannot be discontinued for safety reasons. These potential instances will be reviewed on a case-by-case basis. The IRB Chair or Vice-Chair will immediately notify the Institutional Officials and the Office of Research Compliance, Integrity and Safety of the suspension or termination.

The unanticipated problem will be reported to Office of Human Research Protections if the answers to all four of the following questions are yes:

1. Is the problem unexpected?
2. Is the problem related or possibly related to participation in the research?
3. Does the problem suggest that the research places subjects or others at a greater risk of harm than was previously known or recognized?
4. Does the project have federal funding?

Principal investigators with other regulatory (e.g., FDA) or contractual reporting requirements related to unanticipated problems involving risks to subjects or others are responsible for providing any reports required under those regulations/agreements.

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### **Procedural History of the Policy**

**Approved by the convened Institutional Review Board and the VP for Research in January 2021.**

**Reviewed in June 2022.**