## Policy No. 103.06 - Reports of Unanticipated Problems Involving Risks to Participants or to Others (Problem/Event Reporting)

The JHSPH requires researchers to comply with all applicable local, state, and federal regulations in the conduct of research studies. As part of this requirement, researchers are required to submit to the JHSPH IRB written reports of events that meet the definition of “unanticipated problems involving risks to participants or to others.”

Principal investigators must report such problems/events to the IRB promptly, as well as to applicable regulatory agencies, sponsors, and institutional officials.

A. “Unanticipated problems involving risks to participants or others” is defined as:

(1) The information is **unexpected** in terms of nature, severity, or frequency, given:

a) the research procedures described in the protocol and informed consent document;

and

b) the characteristics of the subject population being studied; and

(2) The information about the event indicates that participants or others are at **greater risk of harm** (including physical, psychological, economic, or social harm) than was previously known or recognized.

B. “Prompt reporting” is defined to be “as soon as possible after the PI learns of the event”, but in all cases **within 10 working days**.

C. Reportable Problem/Events

The JHSPH PI must promptly report the following unanticipated problems or events:

1. Event (including on-site and off-site adverse event reports, injuries, side effects, breaches of confidentiality, or other problems) that occurs any time during or after the research study, which in the opinion of the PI:

a. involved **harm** to one or more participants or others, or placed one or more participants or others at increased risk of harm;

b. is **unexpected** (an event is “unexpected” when it is not described with specificity in the protocol and informed consent document; or if described with specificity, it occurs beyond the expected frequency and/or severity identified); and

c. is **related** to the research procedures (an event is “related to the research procedures” if in the opinion of the principal investigator, it was more likely than not to be caused by the research procedures.)

2. Information that indicates a change to the risk:benefit ratio of the research. For example:

a. An interim analysis indicates that participants have a lower rate of response to treatment than initially expected

b. Safety monitoring indicates that a particular side effect is more severe, or more frequent than initially expected

c. A paper is published from another study that shows that an arm of the research study is of no therapeutic value

3. Change(s) in FDA labeling or withdrawal from marketing of a drug, device, or biologic used in a research protocol.

4. Change(s) to the protocol taken without prior IRB review to eliminate an apparent immediate hazard to a research participant

5. Incarceration of a participant

6. Event that requires prompt reporting to the sponsor

7. Complaint of a participant when the complaint indicates unexpected risks or the complaint cannot be resolved by the research team

8. Protocol “violation” (a term often used by NIH or commercial sponsors, meaning an accidental or unintentional change to the IRB approved protocol) that placed one or more participants at increased risk, or has the potential to occur again

9. An unanticipated adverse device effect as defined by FDA at 21 CFR Part

812.3(s).

Events labeled as “reportable events” in research involving investigational drugs or devices may or may not meet the definition of an “unanticipated problem.” In such cases, the PI must report the event to the JHSPH IRB if it meets the definition of an unanticipated problem or if a sponsor or regulatory authority requires report to the IRB. Events that the sponsor requires the PI to report, but which do not meet the definition of an “unanticipated problem involving risk to participants or to others” will be acknowledged by the IRB but will not be reviewed by an IRB member.

The JHSPH IRB will review each reported problem/event to determine if it meets the definition of an unanticipated problem involving risks to participants or others. Review of a problem/event may require use of a consultant, or assistance from the division or department chair, to collect additional information before a determination is made.

The JHSPH IRB will authorize appropriate actions to address the problem. The range of actions may be taken by the Institutional Official, other senior JHSPH officials charged with taking action, or the IRB. The JHSPH IRB will inform the IO when a determination has been made that a problem/event meets the definition of an unanticipated problem involving risks to participants or others. The IO will fulfill the requirements to report the action to federal departments or agencies as required by regulation and with JHSPH policy.