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## Human Research Protection Program Training

*Post-Approval Event Reporting*

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## Outline for Today

- Roles of the CHR and the QIU
- Types of Post-Approval Events
- Post-Approval Event Report Forms
- Tips
- Open Questions and Answers

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## What is the Role of the QIU?

- Provide Quality Assurance (QA) and Quality Improvement (QI) activities
- Work with the CHR to assure rights and welfare of human research participants and reduce risk

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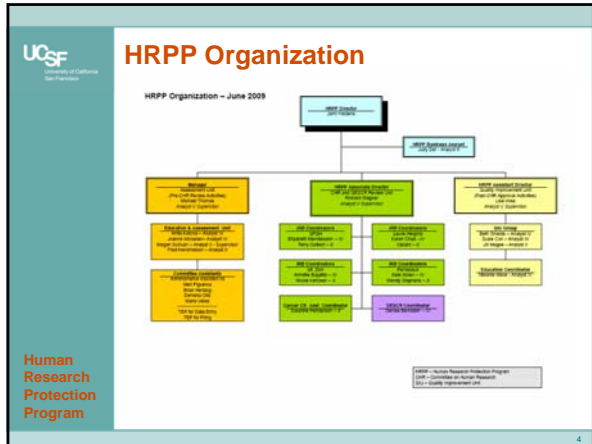
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- ## QIU Activities
- Review Post-Approval Event Reports
  - Review Subject Complaints
  - Process Emergency Use Requests
  - Conduct routine site reviews of clinical research studies
  - Conduct directed or for-cause on-site reviews of clinical research studies
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- ## Post-Approval Event Reports
- Adverse Events
  - Protocol Violations
  - Protocol Incidents
    - Subject or Researcher Concerns and Complaints
    - Approval Lapses
  - Safety Information
    - Investigator Brochure updates
    - DSMB/DMC Reports
    - Audit Reports
    - Holds on Study Activities
  - Study Close-Out Reports
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**Adverse Events (AE's) and  
Serious Adverse Events (SAE's)**

**Determining What to Report  
and What NOT to Report**

\* Important Note: The Sponsor and the FDA have expanded reporting requirements

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**Adverse Events – Internal**

- **PI determines event to be:**
  - Definitely,
  - Probably, or
  - Possibly Related

**AND**

- Serious or Unexpected

**Report within 10 working days on  
Internal AE Reporting Form**

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**Adverse Events – Internal**

- **Death – unrelated to research as  
determined by the PI**  
Only for interventional studies

**Report at time of Renewal or Major  
Modification via the AE Summary Log**

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## Adverse Events – External

- **PI determines that the event:**
  - Changes the study risks or benefits
- OR
- Requires a modification to the CHR Application or the Consent form

**Report within 10 working days on External AE Reporting Form**

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## Adverse Events – External

- **PI determines that the event:**
  - **Does not** change the study risks or benefits
- OR
- **Does not** require a modification to CHR Application or Approved Consent forms

**Reporting NOT required by the CHR but if Sponsor requires reporting use the AE Summary Log**

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## Protocol Violations

**Determining What to Report and What NOT to Report**

\* Important Note: The Sponsor and the FDA have expanded reporting requirements

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**Protocol Violations – Major**

- **Unapproved changes, deviations, or departures from study design that are:**
  - Under PI's control and
  - Have not been reviewed and approved by the CHR

**AND**

- May affect participants' rights, safety, or well-being or impact study data

**Report within 10 working days on Protocol Violation/Incident Reporting Form**

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**Protocol Violations – Minor**

- **Also known as Protocol Deviations**
- **Unapproved changes, deviations, or departures from study design that are:**
  - Under PI's control and
  - Have not been reviewed and approved by the CHR

**BUT**

- Do not affect participants' rights, safety, or well-being or impact study data

**Reporting NOT Required – document in study file**

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**Protocol Incidents**

**Determining What to Report and What NOT to Report**

\* Important Note: The Sponsor and the FDA have expanded reporting requirements

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**Protocol Incidents – Major**

- Any problematic or unanticipated event related to:
  - Conduct of the study or subject participation**AND**
  - Involves significant potential harm to the participants
- Subject Complaints

**Report within 10 working days on Protocol Violation/Incident Reporting Form**

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**Protocol Incidents – Minor**

- Any problematic or unanticipated event related to:
  - Conduct of the study or subject participation**AND**
  - Does NOT involve significant potential for harm to the participants.

**Reporting NOT Required**

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**Safety Information**

**Determining What to Report and What NOT to Report**

\* Important Note: The Sponsor and the FDA have expanded reporting requirements

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**Safety Reports**

- Investigator Drug Brochure
- Safety Information or Updates
- DSMB/DMC Reports
- Audit Reports
- Hold on Study Activities

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Report within 10 working days on Safety Information Reporting Form

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**Study Close-Out Report**

Determining When to Close-Out  
and When NOT to Close-Out

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**Study Close-Out Report**

- Updates the CHR on conduct of the study since the last renewal
- Required for:
  - Studies that received full-committee review at any time
- OR
- Studies that involved participant contact

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Report within 10 working days on Study Close-Out Reporting Form

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## Study Close-Out Report

- **Do NOT Close-Out a study if:**
  - Local enrollment to the study is ongoing
  - Local research-related interventions are ongoing
  - Local participant follow-up is ongoing
  - Data analysis or manuscript preparation that involves use or access to individually identifiable information is ongoing
  - Biological specimens containing individually identifiable information are being maintained in a repository that has been approved as part of this study or upon which analysis or research is ongoing. If specimens were transferred to a separate repository that has ongoing CHR approval, then the study may be closed
  - Your study has an external sponsor and you have not received permission from your study sponsor to close the study with the CHR.

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## The Respective Roles of the CHR and the QIU in Post-Approval Event Reporting

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## CHR Review Process

- **Note report and keep in the CHR file**
- **Request:**
  - Additional information
  - Require a modification
- **Flag a study for future educational efforts, website guidance, and/or routine site visit**
- **Temporarily or permanently suspend and/or terminate enrollment in a study**

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### CHR Review Outcome

- Determine if the report is an:
  - Unanticipated Problem

**AND/OR**

- Serious Non-Compliance

**AND/OR**

- Continuing Non-Compliance

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### Unanticipated Problem

An unexpected, research-related event that exceeds the nature, severity, or frequency described in the protocol, study consent form, Investigator's Brochure or other study information previously reviewed and approved by the CHR, is more likely to be caused by research participation than not

**AND**

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### Unanticipated Problem

a.) results in, or indicates a potential for, a significant risk to enrolled or potential participants or others

**AND**

b.) necessitates corrective action or modification of the conduct of study activities

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**Serious or Continuing Non-Compliance**

Failure to follow state or federal regulations for protection of the rights and welfare of study participants, University policies or the requirements or determinations of the CHR and that, in the judgment of the CHR Chair, Vice-Chair, convened CHR Panel or Associate Vice-Chancellor for Research results in, or indicates a potential for:

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**Serious or Continuing Non-Compliance**

a.) a significant risk to enrolled or potential participants or others

OR

b.) compromises the integrity of the UCSF HRPP or the University

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**CHR Regulatory Reporting Requirements**

- **Federal Departments**
  - Office for Human Research Protection (OHRP)
  - FDA
- **SF Veterans Affairs (if VA study)**
- **Associate Vice-Chancellor for Research**
- **UCSF Legal Affairs**
- **UCSF Privacy Office**
- **Study Sponsor**
- **Other offices or groups as required by the nature of the study**

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**Top Tips and  
Additional Discussion Points**

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**Tips for Post-Approval Event Reporting**

- Ask your PI or Mentor
- PI must sign all Post-Approval Event Reports
- Submit reports only once: either by fax or campus mail
- If you have any questions about the process, call the CHR office at 415-476-1814 and ask to speak to the QIU
- Identify the CHR Approval number (H number) and PI name when calling
- <http://www.research.ucsf.edu/chr/>

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Getting Answers After this Class

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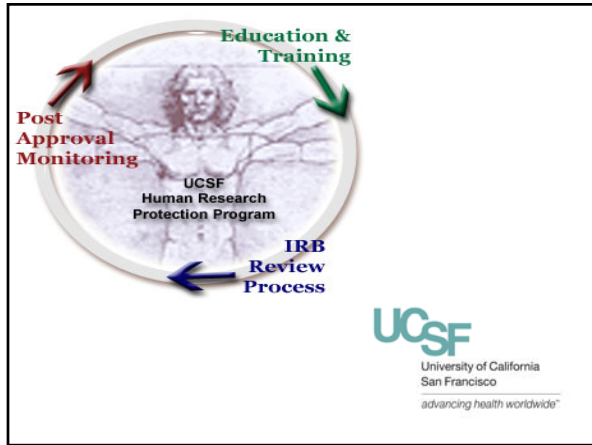
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