NOVA SOUTHEASTERN UNIVERSITY

Unanticipated Problems and Adverse Events

Overview, Definition and References:

Identification and reporting of unanticipated problems /adverse events at the Center/College level leads to more accurate safety profiles for sponsors to make development decisions on, regulatory agencies to make approval and labeling decisions on and healthcare professionals to use in their prescribing decisions. Without reliable and valid unanticipated problem/ adverse event profile, the development of new treatments suffers.

Most importantly, information on unanticipated problems/adverse events should be communicated in appropriate timeframes so that the IRB, regulatory agencies and subjects are informed of the newly discovered risk(s). Reporting helps determine if the investigation should be discontinued and if subjects want to remain in the investigation. Disclosing the information demonstrates elements of the Belmont Report of respect for persons and beneficence.

Definition:
Unanticipated Problems are considered to include any incident, experience, or outcome that meets **all of the following criteria:**

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

Adverse Events are any unanticipated problems involving risks to subjects or others that do not fall into the different categories under Serious Adverse Events (SAEs). For example:

- Breach in confidentiality that may present a risk to a subject.
- A participant's complaint of an unanticipated risk that cannot be resolved by the research staff
- Change to the research protocol that may result in unanticipated risks

Serious Adverse Events are defined as follows:

- Death
- Congenital Anomaly/Birth Defect
- Hospitalization Required
- Life Threatening Event
- Significant or Persistent Disability/Incapacity

- 21CFR312.64(a); 312.64(b); 312.66
- FDA Form 1572: Section 9 (http://www.fda.gov/opacom/morechoices/fdaforms/FDA-1572.pdf)
- ICH Harmonized Tripartite Guideline E6: Good Clinical Practice: 4.3.2, 4.7 & 4.11 (http://www.fda.gov/cder/guidance/959fnl.pdf)
- Guidance for Clinical Investigators, Sponsors, and IRBs. "Adverse Event Reporting to IRBs-Improving Human Subject Protection." http://www.fda.gov/OHRMS/DOCKETS/98fr/FDA-2007-D-0202-gdl.pdf