Policy on Unanticipated Problems Involving Risks to Subjects or Others

Effective date: 04-17-2018

I. Background
The Office for Human Research Protections within the Department of Health and Human Services requires all federally funded research to report unanticipated problems involving risks to subjects or others to the funding agency. These problems must also be reported to the Institutional Review Board and the Institutional Official per this policy. If a research event meets the definition of an unanticipated problem involving risks to subjects or others, researchers must promptly report to the IRB as outlined in this policy. The IRB is charged with reviewing the problem to determine any changes to the research or corrective actions to protect human subjects or others.

II. Definitions

a. Adverse event: Any untoward or unfavorable medical occurrence in a human subject, including any abnormal sign (for example, abnormal physical exam or laboratory finding), symptom, or disease, temporally associated with the subject’s participation in the research, whether or not considered related to the subject’s participation in the research. Adverse events encompass both physical and psychological harms. They occur most commonly in the context of biomedical research, although on occasion, they can occur in the context of social and behavioral research.

b. Unanticipated problem involving risks to subjects or others: An incident, experience, or outcome that meets all of the following criteria:
   - Is unexpected (in terms of nature, severity or frequency) given (a) the research procedures that are described in the protocol-related documents, such as the IRB-approved research protocol and informed consent document; and (b) the characteristics of the subject population being studied;
   - Is 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.
III. Determining when an event is an unanticipated problem involving risks to subjects or others

An adverse event, problem, or incident must be reported to the IRB when it meets the definition of an unanticipated problem involving risks to subjects or others as defined in this policy. If the event does not meet the definition, the researchers may still be required to report adverse events to their sponsors, coordinating centers, data safety monitoring boards, etc. as written in their protocols.

IV. Reporting Requirements and Procedures

a. Researchers: If a researcher determines that an unanticipated problem involving risks to subjects or others occurred, a Report of Unanticipated Problems form must be completed and submitted promptly (within 1 week of event discovery) to the Office of Research Compliance Administration for IRB review.

b. IRB: Once reviewed, if the IRB determines the event is an unanticipated problem involving risks to subjects or others, the IRB will report this to the Institutional Official. The IRB will also report to the sponsor, FDA if under FDA regulation, and OHRP if federally funded. The IRB will report within 30 days of its determination.

V. IRB Review and Actions

The Chair or the Chair's designee as necessary will review the form and forward to the Committee if potentially reportable. The Institutional Official may suspend some or all human research activities if an urgent situation presents itself. The IRB will review the event to determine whether it is an unanticipated problem involving risks to subjects or others and if so will report as outlined in this policy. The IRB will also determine whether the study needs to be amended (e.g., additional monitoring, change in procedures, additional information in consent and risks section) or suspended (e.g., suspend new enrollment, procedures, etc.) based upon risks to subjects or others.

VI. References

a. OHRP Guidance on Reviewing and Reporting Unanticipated Problems Involving Risks to Subjects or Others and Adverse Events
b. 45 CFR 46.103(a); 46.103(b)(5); 46.109(e); 46.111(a)(1), (a)(2), and (a)(6); 46.113
c. 21 CFR 56.113 and 21 CFR 812.150