Creighton UNIVERSITY
Institutional Review Board

Investigator Reporting Deadlines to CU IRB

EVENT	REPORT DUE WITHIN
Fatal Internal Adverse Events (AEs) including fatal Unanticipated Adverse Device Effects (UADEs)	**24 Hours** of PI Awareness
All Other Internal Adverse Events (AEs) including UADEs that are *unexpected and related or possibly related* to participation in the study	**2 Business Days** of PI Awareness
Unanticipated Problems to Subjects or Others (UAPs)	**2 Business Days** of PI Awareness
Serious External Adverse Events	**5 Business Days** of PI Awareness
Research Study Complaints	**5 Business Days** of PI Awareness
Possible PI/Study Team Noncompliance Resulting in Harm to a Subject or Subjects	**5 Business Days** of PI Awareness
DSMB or IND Safety Reports including information on serious risks to the welfare of subjects or recommending substantive changes to study documents.	**5 Business Days** of PI Awareness
Possible PI/Study Team Noncompliance NOT Resulting in Harm to Subjects	**10 Business Days** of PI Awareness
All other DSMB and IND Safety Reports	At Continuing Review
All other AEs and Protocol Deviations	At Continuing Review

DEFINITIONS AND EXAMPLES

Adverse Event: Any untoward or unfavorable occurrence in a human subject temporally associated with the subject's participation in the research. AEs may be physical, psychological, social, legal, or economic.

- Examples: Rash, arrythmia, nausea or vomiting, abnormal labs, altered cognitive state, dizziness, breach of confidentiality or privacy.

Serious Adverse Event: An AE which results in death, a life-threatening event, inpatient hospitalization or prolongation of existing hospitalization, a persistent or significant incapacity or substantial disruption of the ability to conduct normal life functions, or a congenital anomaly/birth defect. Events may also be considered serious when they require medical or surgical intervention to prevent one of the outcomes listed in this definition.

Internal Adverse Event: An AE experienced by a subject in a study conducted at Creighton or at an external site under the jurisdiction of the CU IRB.

External Adverse Event: An AE experienced by a subject in a study conducted at an external site (not under the jurisdiction of the CU IRB).

Research Study Complaint: Problems, concerns, or questions raised by current, prospective, or past research participants or their representatives regarding their participation in human subjects research.

Unanticipated Problem (UAP) to Subjects or Others*: An event that meets the following three criteria:

1) Event is unexpected in terms of specificity, severity, or frequency, considering the nature of the research, the characteristics of the subject population, and the information contained in the protocol, protocol-related documents, and the ICF. Events consistent with the expected natural progression of any underlying disease, disorder, or condition of the subject are not unexpected.
2) Event is related or possibly related to subjects' participation in the research or procedures involved in the research.
3) A subject or others suffered harm or were placed at greater risk of harm (including physical, psychological, economic, social, or legal) than was previously anticipated under the IRB approved protocol and other study documents.

** Though not a required criterion for definition of an event as a UAP, an event that is a UAP generally warrants substantive changes in the research protocol or informed consent process/document or other corrective actions to protect the safety, welfare, or rights of subjects or others.*

- Examples: Identification of a new or increased risk related to the use of an investigational product or technique; malfunction of a research device; breach of confidentiality or privacy; lost or stolen laptop or USB drive containing

subjects' PHI; any event, discovery, or condition which results in a change to the study protocol or consent in order to protect the rights, safety, or welfare of subjects.

Noncompliance: Any failure to follow federal regulations (including but not limited to 45 CFR 46, including any applicable subparts), HRPP policies, the requirements or determinations of the IRB or the provisions of the IRB-approved research study.

Serious Noncompliance: A violation of applicable federal regulations, HRPP policies, or the determinations of the IRB which (a) significantly increases the risk to subjects, or otherwise compromises the rights and welfare of research subjects; or (b) appreciably decreases the potential direct benefit to subjects; or (c) compromises the scientific integrity of the research.

- Examples: Conducting non-exempt human subjects research without IRB approval; failure to obtain informed consent; implementing changes to the study protocol without IRB approval when the change is not required to address an emergency; failing to adhere to eligibility criteria, timely perform safety assessments, communicate new information to subjects, or adhere to conditions of IRB approval resulting in an increase in risks to subjects' rights, safety, or welfare; a finding from an auditor or inspector that an event or condition resulted in increased risks to subjects' rights, safety, or welfare; arrest or other criminal action against an investigator and/or a suspension of the investigator's medical license or privileges; failure to timely submit Prompt Reporting Event to the IRB; giving an investigational product to the wrong study subject.

Continuing Noncompliance: Repeated incidents of the same or substantially similar noncompliance after the investigator or staff has been notified that the action represents non-compliance or despite appropriate retraining and/or a specific corrective action plan; or repeated incidents of the same or substantially similar noncompliance of such a nature that the investigator should have reasonably known that such an action was noncompliance.

- Examples: Repeated violations of the study protocol or institutional policies; ongoing failure to renew an active study prior to expiration; ongoing failure to respond to IRB inquiries, contingencies, or requests for information; failure to implement or adhere to corrective action plans; ongoing inadequate oversight of research; multiple instances of serious or minor noncompliance; a pattern of repeated protocol deviations over a period of months or across study protocols; repeated protocol deviations after retraining.