REPORTABLE EVENTS – Guidance for Lead Investigators

KUMC investigators who are lead PI's for multi-site research take on additional IRB reporting requirements for events at the participating sites. Site updates and reportable events fall into the following categories:

- Changes to personnel at relying sites
- Site-specific protocol changes (e.g., new recruitment strategies; enrollment of non-English speaking subjects; changes to costs or payment at the site)
- New conflicts of interest disclosures involving relying study teams
- Adverse events that require prompt reporting
- Unanticipated problems that require prompt reporting
- Non-compliance that requires prompt reporting

Changes to personnel at relying sites

Study teams should submit a personnel modification in the myIRB system when there are changes to the study team at relying sites. The submission should include documentation from IRB representatives at the site, confirming that the individual is current on human subjects training and conflict of interest requirements at their home institution.

Please consult with the IRB reliance manager if there are changes to site investigators. Additional coordination with the site's IRB office will be required prior to updating the site's consent documents.

Site-specific protocol changes

Investigators should notify the IRB throughout the study if any site needs local changes in the approved protocol or study documents. For example, relying sites may have updates in their recruitment strategies, payments to subjects or needs for non-English consent forms. The IRB will review these changes and approve site-specific documents as needed.

New conflict of interest disclosures

Throughout the study, the lead investigator should promptly update the IRB if any new disclosures are made about conflicts of interest related to the research. Typically, the relying institution will perform its own conflict of interest analysis and provide the KUMC IRB with their local management plans. The KUMC IRB will, to the extent possible, accept the site's management plan as long as it determines it is adequate to protect human subjects. The KUMC IRB has the prerogative to impose additional requirements.

Adverse events

The KUMC lead investigator is responsible to promptly notify the IRB of any reportable adverse events at any of the study sites. Because KUMC is the Reviewing IRB for all the sites, adverse events at the relying sites are evaluated as 'internal' events under our adverse event policy. Prompt reporting to the IRB (within 5 working days of the study team's awareness) is required for any event that is unexpected **and** that is judged by the investigator to be related or probably related to participation in the research:

A. "Unexpected" events are those that differ in nature, severity or frequency from risk information previously reviewed and approved by the IRB.

B. "Related or probably related" events are those that are, in the opinion of the investigator, more likely than not attributable to study participation. In determining whether the event is likely attributable to study participation, the investigator uses his or her expertise about the condition under study, experience with the study drug, available data from related studies, and information from the study sponsor in the case of multi-center trials. The investigator also evaluates the temporal relationship with study interactions or interventions and whether symptoms decrease or disappear when a test article is withdrawn. Events are not considered to be related if they are judged to be caused by the clinical state or clearly attributable to unrelated circumstances.

The KUMC IRB will work collaboratively with the relying institution to protect the welfare of subjects and to assist the site investigator in meeting his/her institutional responsibilities.

Unanticipated problems

In addition to certain adverse events, investigators should promptly report other unanticipated problems that impact safety and welfare of subjects or indicate that changes to the protocol may be needed. Examples include: breach of confidentiality, equipment failures, randomization errors, disruption in the available of study therapy, incarceration of a subject and subject complaints. The IRB's main webpages provide additional guidance about reporting unanticipated problems.

Non-compliance

The KUMC lead investigator is responsible to promptly notify the IRB of any reportable non-compliance that occurs at any of the study sites. Prompt reporting to the IRB (within 5 working days of the study team's awareness) is always required in the following circumstances:

A. Failure to obtain informed consent, or re-consent when required by the IRB
B. Modifying the protocol without IRB approval, except to avoid immediate hazard to subjects
C. Conducting the research prior to IRB approval, during an IRB suspension or after IRB approval expires

Additionally, prompt reporting is required for other non-compliance that the investigator determines causes harm, increases risk of harm, adversely affects the rights and welfare of participants or undermines the scientific integrity of the data.

The KUMC IRB will work collaboratively with the relying institution to protect the welfare of subjects and to jointly determine the appropriate corrective actions.