MCW IRB Committee Guidelines

REVIEW OF REPORTABLE EVENTS

Unit: Human Research Protections Program (HRPP), Office of Research
Applies to: MCW/FH Institutional Review Board Committees

PURPOSE:
This procedure outlines the steps taken when a reportable event submission will be reviewed by the Medical College of Wisconsin/Froedtert Hospital (MCW/FH) Institutional Review Board (IRB) either by expedited review or Full Committee and the expectations of the IRB members assigned as primary and/or secondary reviewers.

DEFINITIONS:
N/A

PROCEDURE:
REVIEW OF REPORTABLE EVENTS
1. At the time of review, the IRB Committee considers the reportable event submission as a description of an event which met the prompt reporting requirements as described in IRB SOP: Requirements for Reporting to the IRB and will be reviewed in accordance with regulatory and institutional requirements.
2. The IRB Coordinator II assigns the eBridge reportable event submission to one or two IRB member(s) who are responsible for leading the discussion when the Committee reviews the submission in accordance with IRB Staff: Assigning Primary Reviewers and the Use of Consultants and the IRB Member Guide to Presenting a Concise Review of Reportable Events are available via the HRPP website under Committee Resources.
3. The IRB Coordinator II will provide to the Primary Reviewer and the other Committee Members access to the following documents:
   - The Protocol, if applicable
   - The Consent Form, if applicable
   - Investigator’s Brochure or Device Manual or safety information, if applicable
4. The Primary Reviewer performs an in-depth review of all the information included in the eBridge submission for which he/she is assigned according to the standards outlined in the IRB Member Guide to Presenting a Concise Review of Reportable Events as appropriate.
5. The IRB Committee must determine if the event represents or does not represent either an unanticipated problem involving risk to subjects or others or serious and/or continuing noncompliance. The IRB will use the following criteria in its determination:
   - Unanticipated problems involving risk to participants or others (UPIRSO):
     - Any incident, experience, or outcome that meets all of the following criteria:
       - Unanticipated (in terms of nature, severity, or frequency) given (a) the research procedures described in the protocol-related
documents, such as the IRB-approved research protocol and informed consent document, Instructions for Use/Device Manual and/or Investigator's Brochure; and (b) the characteristics of the subject population being studied;

- related or possibly related to participation in the research (in this guidance document, 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) or test article; 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.

- **Serious non-compliance.** Serious non-compliance is defined as failure to follow any of the regulations and policies described in this document or failure to follow the determinations of the IRB and which, in the judgment of either the IRB Chair or the convened IRB, increases risks to subjects, decreases potential benefits, or compromises the integrity of the human research protection program.

- **Continuing non-compliance.** Continuing non-compliance is defined as a pattern of non-compliance that, in the judgment of the IRB Chair or convened IRB, suggests a likelihood that instances of non-compliance will continue without intervention. Continuing non-compliance also includes failure to respond to a request to resolve an episode of non-compliance.

The specific criteria are made available to all members via the HRPP website and during the meeting.

**Expedited Review of Reportable Events**

1. The IRB Coordinator II will identify if a reportable event submission may qualify for expedited review by either the IRB Chairperson or a designated IRB reviewer based upon IRB SOP: Requirements for Reporting to the IRB.
2. The IRB Coordinator II will complete his/her review and upload the C2 Review Checklist for Reportable Events (RE) with his/her notes.
3. The IRB Coordinator II will assign the reportable event to the IRB Chairperson or designated reviewer to complete the review.
4. The IRB Chair or designated reviewer will review the C2 Review Checklist for Reportable Events (RE) and the reportable event submission along with any additional documents submitted for the event.
5. The IRB Chair or designated reviewer will include in his/her review a determination if the event appears to meet the criteria for either a UPIRSO or Serious and/or continuing noncompliance.
6. The IRB Chair or designated reviewer will complete the IRB Member Guide to Presenting a Concise Review of Amendments and indicate his/her decision via eBridge:
   - to acknowledge the event, or
   - require modifications, or
   - forward the event for review by the Full Committee, as the event may appear to be an UPIRSO or Serious and/or Continuing Noncompliance.

**Convened Meetings and the Primary Reviewer System**

6. When the MCW/FH IRB Committee reviews a reportable event submission at a convened meeting, HRPP staff provides all members with sufficient information to evaluate whether the event meets criteria for an UPIRSO or Serious and/or
Continuing Noncompliance. All MCW/FH IRB members have access the same information.

7. The MCW/FH IRB Committees use a “primary reviewer” system to promote a thorough review of the reportable event submission at a convened meeting.¹

8. With this system, the IRB Coordinator II assigns the reportable event submission to one or two IRB member(s) who are responsible for leading the discussion when the Committee reviews the submission. The reviewers are assigned in accordance with IRB Staff: Assigning Primary Reviewers and the Use of Consultants. IRB Member Guide to Presenting a Concise Review of Amendments are available via HRPP website under Committee Resources.

9. The Primary Reviewer performs an in-depth review of all the information of the reportable event submission for which he/she is assigned according to the standards outlined in the IRB Member Guide to Presenting a Concise Review of Reportable Events as appropriate.

10. All other IRB Committee members are expected to review key documentation from the information submitted to the IRB Committee in the reportable event submission to the extent necessary to be prepared to participate in the discussion of the regulatory criteria for monitoring approved human subject research. For more information reference, IRB Member Guidelines: Conduct and Expectation of IRB Members.

a. For review of a reportable event submission “key documentation” includes the following:
   - SmartForm application
   - Safety Reports, Data Safety Monitoring Board/Data Monitoring Committee (DSMB/DMC) reports, Investigator Brochures (IBs), notifications from Sponsors (if applicable)

11. If the assigned Primary Reviewer, the IRB Chair or HRPP director determines that additional expertise is needed for review of the event, an appropriate consultant will be invited to assist in the review of the research in accordance with IRB Staff: Assigning Primary Reviewers and the Use of Consultants.

12. Following the presentation, the Primary Reviewer makes a motion for the IRB Committee’s vote as outlined in IRB Member Guidelines: IRB Actions and opens the floor for discussion among the members. At the end of the discussion the IRB Chair will call for a vote.
   - If additional information, or a modification is required, the study team should respond within the identified timeframe or no later than 30 days to the IRB’s request.

13. If the IRB Committee determines that the reportable event submission constitutes an UPIRSO or Serious and/or Continuing Noncompliance, the IRB Chair and the IRB Coordinator II will notify the HRPP Director of this determination. The HRPP Director will notify the Institutional Official and report the event to the required regulatory agencies in accordance with IRB Staff: Correspondence with and Reports to Federal Agencies.

REFERENCES:
45 CFR 46.108
45 CFR 46.111
45 CFR 46.116
45 CFR 46.117
21 CFR 56.108

SUPPORTING DOCUMENTS:
IRB SOP: Requirements for Reporting to the IRB IRB Member Guidelines: Informed Consent for Human Subject Research
IRB Member Guidelines: Research with Subjects Likely to Manifest or Develop Decreased Decisional Ability
IRB Member Guidelines: Legally Authorized Representatives (LAR's): Who Can Consent on Behalf of an Adult Subject with Decreased Decisional Ability
IRB Member Guidelines: Privacy and Confidentiality
IRB Member Guidelines: Research Involving Prisoners
IRB Member Guidelines: Research Involving Pregnant Women and Children
IRB Staff: Assigning Primary Reviewers and Use of Consultants.
IRB Member Guidelines: IRB Actions
IRB Member Guidelines: IRB Member Guide to Presenting a Concise Review of Reportable Events

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Approved By
HRPP Authorized Official:

David Clark, PhD, Director, HRPP
Human Research Protections Program (HRPP)
Office of Research
Medical College of Wisconsin