



Trustees of Dartmouth College • Dartmouth-Hitchcock Medical Center
COMMITTEE FOR THE PROTECTION OF HUMAN SUBJECTS

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**Data Safety Monitoring and Reporting of Adverse Events to the
Committee for the Protection of Human Subjects at Dartmouth
For Clinical Trials**

Appropriate monitoring of study data is an important safeguard for the human subjects who participate in clinical trials. Data safety monitoring (DSM) requirements depend on the nature, size, and complexity of each clinical trial. The Committee for the Protection of Human Subjects at Dartmouth (CPHS) is not a data safety monitoring committee. Appropriately designed DSM should be described in every CPHS Study Plan. With each request for renewal of CPHS approval, all relevant DSM summary reports should be included with the application materials.

The following information describes the position of the CPHS on the reporting of unanticipated problems involving risks to subjects participating in clinical trials. The CPHS position applies to the reporting of certain serious adverse events (SAE) and investigational new drug (IND) safety reports, as well as unanticipated adverse device effects (UADE) (collectively “adverse events”). This statement is consistent with applicable federal regulations, but does not cover all unanticipated problems involving risks to subjects or others. Please see the CPHS UPR Reporting Form for information on the reporting of unanticipated problems involving risks to subjects or others that are NOT adverse events.

The CPHS expects to receive reports on only the UADE, SAE, and IND safety reports that satisfy the criteria described below in this statement. The position taken by the CPHS on adverse event reporting does not eliminate any requirement for an investigator to report adverse events to the FDA, other regulatory or funding agencies, or the sponsor. It also does not alter the requirement for the principal investigator to review adverse event reports s/he receives from the sponsor or other agency.

The CPHS should be promptly notified of unanticipated problems involving risks to subjects participating in clinical trials, which includes only certain SAE and IND safety reports. Unanticipated adverse device effects, if occurring at a site subject to CPHS review, should be reported to the sponsor and CPHS as soon as possible, but no later than 10 working days after an investigator learns of the effect.

Definitions: **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 research, whether or not considered related to the subject’s participation in the research.*

Serious: *Death, a life-threatening adverse drug experience, inpatient hospitalization or prolongation of existing hospitalization, a persistent or significant disability or incapacity, or a congenital anomaly or birth defect.*

Unexpected: *Any adverse drug experience, the specificity, severity or frequency of which is not consistent with the current investigator brochure or consent form.*

Possibly related: *A reasonable possibility exists that the experience may have been associated with the procedures involved in the research.*

Unanticipated adverse device effect: *Any serious adverse effect on health or safety, or any life-threatening problem or death, caused by or associated with an investigational device.*

Investigators should report to the CPHS only events that are **SERIOUS, UNEXPECTED**, and at least **POSSIBLY RELATED** to the procedures involved in the research. The CPHS form for reporting the event should be completed by the **PRINCIPAL INVESTIGATOR** for each serious, unexpected, possibly related event, only if **BOTH** of the following additional criteria are satisfied:

- The adverse event occurred on a CPHS-approved clinical trial; and
- The trial is open at a site subject to review by the CPHS.

Please note: If all of the above criteria are satisfied, the reported adverse event may have occurred at any location where the trial is open.

The CPHS office does not acknowledge receipt of adverse event reports. Please provide this statement to any sponsor with questions regarding SAE, IND safety, or unanticipated adverse device effect reporting.

The CPHS reviews each reported adverse event to determine whether:

- 1) The participants in the study should receive additional information related to continuing their participation;
- 2) The protocol, study plan or consent form should be modified; or
- 3) The study should be temporarily suspended.

If the CPHS determines that some action in response to the adverse event is necessary, the CPHS will promptly inform the principal investigator.

The CPHS does not review reports for adverse events that occurred before the study was approved by the CPHS.

For additional information about adverse event reporting requirements, please consult the FDA regulations on unanticipated adverse device effects at 21 C.F.R. 812.150 or on IND safety reports at 21 C.F.R. 312.32, as well as the clinical trial agreement with the sponsor.

References: 45 C.F.R. 46.103(b)(5)
21 C.F.R. 312.32
21 C.F.R. 812.3 and 812.150(a)(1)
January 15, 2007 OHRP Guidance on Reviewing and Reporting Unanticipated Problems Involving Risks to Subjects or Others and Adverse Events
January, 2009 FDA Procedural Guidance for Clinical Investigators, Sponsors, and IRBs: Adverse Event Reporting to IRBs- Improving Human Subject Protection