

## Post-Approval Reporting Requirements Summary Sheet

Federal regulations and the UCSF IRB/HRPP require investigator reporting of any post-approval research-related event or information that may meet the HRPP's institutional definitions of "*unanticipated problem involving risk to participants or others*" or "*serious or continuing noncompliance*." The IRB determines whether these definitions apply when evaluating investigator event reports. The following table summarizes which types of events or information should be reported to the IRB/HRPP, the reporting window and appropriate reporting form to use.

See the [Adverse Event](#) and/or [Protocol Violation or Incident](#) sections of the UCSF HRPP website for definitions and details. Questions? Contact the IRB at 415-476-1814 or [IRB@ucsf.edu](mailto:IRB@ucsf.edu) and ask to speak with the QIU (Quality Improvement Unit) Analyst of the day.

### What, When, and How to Report to the HRPP

| Type of Event                                                                                                                                                                                                                                            | When to Report*                                                                                                                                                | Reporting Form                               |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|
| * The SFVAMC has a shorter timeline and different definitions than UCSF for reporting certain categories of post-approval events. (The website pages noted above include links to the relevant SFVAMC information.)                                      |                                                                                                                                                                |                                              |
| <b>ADVERSE EVENTS</b>                                                                                                                                                                                                                                    |                                                                                                                                                                |                                              |
| <b>Internal (on-site) adverse event</b> that PI determines to be<br>1. Definitely, Probably or Possibly related<br><b>AND</b><br>2. Serious or Unexpected<br><b>Internal, related deaths and life-threatening events should be submitted immediately</b> | Within <b>5 working days</b> of UCSF PI awareness                                                                                                              | iRIS Adverse Event Reporting Form            |
| <b>External (off-site) adverse event</b> that UCSF PI determines<br>• changes the study risks or benefits, <b>OR</b><br>• necessitates modification to the IRB-approved consent document(s), and/or the IRB-approved application/protocol                | Within <b>10 working days</b> of UCSF PI awareness                                                                                                             | iRIS Adverse Event Reporting Form            |
| <b>OTHER TYPES of EVENTS or SAFETY INFORMATION</b>                                                                                                                                                                                                       |                                                                                                                                                                |                                              |
| <b>Audit or Monitoring Report</b> with significant findings                                                                                                                                                                                              | Within <b>10 working days</b> of awareness                                                                                                                     | iRIS Reporting Form                          |
| <b>DSMB/DMC Report</b>                                                                                                                                                                                                                                   |                                                                                                                                                                |                                              |
| <b>Hold on Study Activities</b> due to unexpected risk or required by any oversight entity e.g. UCSF, FDA, OHRP                                                                                                                                          |                                                                                                                                                                |                                              |
| <b>Updated Investigator Brochure</b>                                                                                                                                                                                                                     |                                                                                                                                                                |                                              |
| <b>Other Safety Information or Publication</b>                                                                                                                                                                                                           | <b>Change</b> to risk language: Within <b>10 working days</b> of awareness                                                                                     | iRIS Reporting Form                          |
| <b>Pharmacy Packet Inserts</b>                                                                                                                                                                                                                           | <b>No change</b> to risk language: <b>Reporting not required</b>                                                                                               |                                              |
| <b>PROTOCOL VIOLATIONS and RESEARCH-RELATED INCIDENTS</b>                                                                                                                                                                                                |                                                                                                                                                                |                                              |
| <b>Major Violation</b> including, but not limited to incorrect intervention given, enrollment of ineligible participant, key safety procedure/lab not done or done outside window.                                                                       | Within <b>10 working days</b> of awareness                                                                                                                     | iRIS Protocol Violation/Incident Report Form |
| <b>Immediate Protocol Change to Protect Participant Safety</b>                                                                                                                                                                                           | Within <b>10 working days</b> of occurrence                                                                                                                    |                                              |
| <b>Major Incident</b> including, but not limited to problem with consent or recruitment process, significant complaint or concern, lapse in study approval, loss of adequate resources, potential breach of confidentiality or privacy.                  | <b>Potential breaches of privacy or confidentiality: Within 48 hours of awareness</b><br><br><b>Other Major Incidents: Within 10 working days</b> of awareness |                                              |