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RESEARCH ETHICS BC

Guidance for Post Approval Reporting

For Provincial Research Ethics Platform (PREP) Users

Scope

This guidance is intended as further clarification on the reporting responsibilities of the Lead Principal Investigator (Lead PI), the definitions of reportable and non-reportable events to the REB, and reporting timelines for studies conducted under the auspices of more than one Research Ethics BC (REBC) network institution. The guidance is primarily for research teams and applies to both minimal and above minimal risk research. It refers only to reporting within the harmonized platform of RISe/PREP, and does not include reporting requirements for Health Canada.

Under the harmonized research ethics model, all events must be reported to the Board of Record REB. Due to the structure of the system, the Lead PI is the only role able to submit reports through the platform.

There is some crossover between this document and other guidance materials (i.e., Pilot Model for Harmonized Clinical Trials).

Definitions

Investigator Roles

Regulatory bodies and legislation have multiple ways of referring to study investigators. Below is a breakdown of some common terms. Their different responsibilities for reporting in RISe/PREP will be outlined in following sections.

Lead Principal Investigator (Lead PI): An individual who both initiates and conducts, alone or with others, a study, and under whose immediate direction the investigation takes place. In clinical trial settings, also referred to as the “Sponsor Investigator”. In RISe/PREP, the Lead Principal Investigator is considered the investigator for the lead/first site in BC and is listed in Box 1.1 of the application.

Sponsor-Investigator: An individual who both initiates and conducts, alone or with others, a clinical trial, and under whose immediate direction the investigational product is administered to, dispensed to, or used by a subject. The term does not include any person other than an individual (e.g., it does not include a corporation or an agency). The obligations of a sponsor-investigator include both those of a sponsor and those of an investigator. Also referred to as the “Lead Principal Investigator.”

Qualified Investigator (QI): The person responsible to the sponsor for the conduct of the regulated clinical trial at a clinical trial site, who is entitled to provide health care under the laws of the province where that clinical trial site is located, and who is: a) in the case of a clinical trial respecting a drug to be used for dental purposes only, a physician or dentist and a member in good standing of a professional medical or dental association; and b) in any other case, a physician and a member in good standing of a professional medical association.

Co-Investigator (Co-I): Any individual member of the study team who makes a significant contribution to the intellectual direction of the research, who plays a significant role in the conduct of the research, and who may also have some responsibility for financial aspects of the research. For regulated clinical trials, the term “sub-investigator” may be used.

Site Principal Investigator (Site PI): A person responsible for the conduct of the study at one of the study sites. If a study is conducted by a team of individuals at a study site, the Site Principal Investigator is the responsible leader of the team. Sub-Investigators/Co-Investigators are different from Site Principal Investigators. However, in RISe/PREP, Site Principal Investigators, Qualified Investigators will be identified as Co-Investigators in Section 1 of the application.

Local Reportable Events

Local Serious Adverse Event (SAE)	An adverse event that is documented at the local (BC) study site, and is: • Serious[1], • Unanticipated, and • Related or possibly related to participation in the study
Major Protocol Deviation	Any change from REB-approved protocol that adversely affects the: • risk/benefit ratio of the study, or • rights, safety, or welfare of the participants or others, or • integrity of the study
Privacy Breach	The improper or unauthorized collection, use, disclosure, retention or disposal of personal information.
Negative Inspection or Audit Finding or Enforcement Action	Any adverse finding issued to, or enforcement action taken against, the PI.
Other Unanticipated Problem	Unanticipated problem that adversely affects the: • risk/benefit ratio of the study, or • rights, safety, or welfare of the participants or others, or • integrity of the study

External Reportable Events

Summary or Listings of External SAE Reports (e.g., IND Safety Reports) from the Sponsor	ONLY Unanticipated problems that adversely affects the: • risk/benefit ratio of the study, or • rights, safety, or welfare of the participants or others, or • integrity of the study
Reports, publications, or interim results or findings	All reports, publications, or interim results or findings.

[1] Events are considered serious if it 1) results in death; 2) is life threatening; 3) requires inpatient hospitalization or prolongation of existing hospitalization; 4) results in persistent or significant disability/incapacity; 5) is a congenital anomaly/birth defect; based upon appropriate medical judgement, is an important medical event that may jeopardize the participant or may require medical intervention to prevent one of the outcomes listed above.

New or updated study product safety information	All new or updated study product safety information and a summary of changes. This includes study product and comparator drugs
Recalls / Withdrawals	Correspondence communicating a Regulatory Agency or Sponsor mandated marketing recall or withdrawal.

Non-Reportable Events

Minor Protocol Deviations	Any change from REB-approved protocol that **does not** affect the: • risk/benefit ratio of the study, or • rights, safety, or welfare of the participants or others, or • integrity of the study e.g. Study visits performed slightly out of window. These can be flagged at annual renewal.
Individual Non-Local SAE Reports	SAE Reports from external sites not compiled into summary safety reports or listings.
Minor Complaints Resolved by Research Staff	Minor research participant complaints resolved by the research staff. For example, did not receive parking reimbursement, or other administrative concern.

Reporting Responsibilities

Submitting in RISe/PREP

Only the Lead PI (listed in Section 1.1) can click submit on the initial application and post-approval activities, such as amendments, requests for acknowledgements, renewals and closures.

Any research team member with online access (Sections 1.2, 1.3.A, 1.4.A) can initiate an application or post-approval activity.

Research team members (including Co-Is, Site PIs) will need to coordinate with the Lead PI to submit site-based amendments and unanticipated problems. In some instances, a Co-I may have the ability to submit on behalf of the Lead PI.

Document Sharing Responsibilities

Once the study is approved, the Lead PI is responsible for ensuring all study teams members (Site QIs, co-investigators, etc.) have access to the approved study documents, either through RISe/PREP or by providing them to the sites. This includes the Certificate of Approval for the initial application, as well as certificates for all relevant post approval activities (amendments, renewals, requests for acknowledgement, etc.).

Following initial approval of the study by the REB, the Lead PI will be responsible for submissions to the REB (Board of Record identified in RISe/PREP) including:

- All requests for acknowledgement
- Reporting safety events

    - Safety events shall be reported within **15** calendar days of the investigator becoming away of the problem(s)
    - Fatal or life-threatening reportable local SAEs should be reported within **7** calendar days.
- Amendment requests that affect the overall study
    - Site PIs may initiate minor administrative amendments that do not impact study documentation (e.g. consent forms, recruitment posters, etc.). However, only the Lead PI will be able to click “submit.” Site PIs will need to arrange this with the Lead PI.
- Adding sites as an amendment including all required site-specific information
    - This includes Site PIs/QIs, Co-Is, study locations, anticipated number of participants recruited, and recruitment/consent/data management procedures (as necessary)
- Reporting protocol deviations
    - Protocol deviations shall be reported in RISe/PREP by either the Lead PI or the Site PI, depending on the site where the protocol deviation occurred, within **15** calendar days of discovery. Again, for reporting in RISe/PREP, Site PIs will need to contact the PI to submit on their behalf.
    - Deviations or changes from the protocol to eliminate immediate hazards to participants must be reported as soon as reasonably possible, but not more than within **5** days of discovery.
- Annual renewal application(s)
- Study closure application