Submitting an RNI (Reportable New Information) in eIRB+

RNI Basics

During the course of a research study, Unanticipated Problems Involving Risk to Subjects or Others (UPIRSOs) and non-compliance may occur and need to be reported to the NU IRB.
The NU IRB website contains detailed guidance on the types of scenarios that require reporting to the IRB as well as the appropriate procedures for doing so: https://irb.northwestern.edu/process/reportable-new-information

Specifically, the following events are considered reportable. More information/examples of each of these can be found on the IRB website linked above.

- **Risk**: Information that indicates a new or increased risk, or a safety issue. This includes a chance that something bad could happen.
- **Harm/Death**: Any harm (including death) experienced by an NU subject or other individual(s) that, in the opinion of the investigator, is unexpected and at least probably related to the research procedures. **Harms can include psychological, economic, legal, and other non-physical harms.**
- **(Reportable) Non-compliance:** Serious and/or continuing non-compliance with the federal regulations governing human research or with the requirements or determinations of the IRB that causes harm, increases the risk of harm, adversely affects the rights or welfare of participants or undermines the scientific integrity of the data, or an allegation of such non-compliance. **Incidents of non-compliance on the part of research participants which do not involve risk need not be reported to the IRB (i.e., failure to turn in medication diary).**
- **Audit**: Audit, inspection, or inquiry by a federal agency and any resulting reports (e.g., FDA Form 483)
- **Reports**: Only certain written reports of study monitors must be reported. Prompt reporting (within 5 days) is required for monitoring reports for which the industry sponsor determines the findings could affect the safety of participants or influence the conduct of the study.
- **Researcher Error**: Failure to follow the protocol due to the action or inaction of the investigator or research staff.
- **Confidentiality**: Breach of confidentiality.
- **Unreviewed Change**: A participant at a non-Northwestern site has experienced a severe and unexpected reaction to the study drug. The sponsor thinks this may be related to the study drug and instructs sites to promptly lower the drug dosage to eliminate an immediate hazard to participants. In this case, the PI should immediately implement the dosage change prior to IRB approval and then submit an RNI to notify the IRB.
- **Incarceration**: Incarceration of a subject in a study not approved by the IRB to involve prisoners.
- **Complaint**: Complaint of a subject that cannot be resolved by the research team.
- **Suspension:** Premature suspension or termination of the research by the sponsor, investigator, or institution.
- **Unanticipated Adverse Device Effect**: Any serious adverse effect on health or safety or any life-threatening problem or death caused by, or associated with, a device, if that effect, problem, or death was not previously identified in nature, severity, or degree of incidence in the investigational plan or application (including a supplementary plan or application), or any other unanticipated serious problem associated with a device that relates to the rights, safety, or welfare of subjects.

- **Investigational Pharmacy Error:** An error involving the investigational pharmacy that puts participants' rights and/or welfare at risk or undermines the scientific integrity of the data. Please also notify the Investigational Pharmacy at INVdrugser@nm.org to get additional information for your RNI (e.g., Corrective Action Plan).
- **Short Form**: If using a translated short form from the IRB website and the English language consent document as the written summary, the short form consent process may take place prior to IRB review. An RNI should be submitted to the IRB within 10 days, to report the use of the short form consent process. The RNI should contain the documents and confirmations previously described above. Additional guidance on short forms can be found here

Information that does not fit into one of the categories above does not need to be submitted, per NU IRB's requirements, but may still be submitted at the PI or study team's discretion.

UPIRSOs

(Unanticipated Problems Involving Risk to Subjects or Others)

If a sponsor issues a study-wide safety report, and the NU principal investigator determines that the incident, experience, or outcome fits ALL of the following conditions (i.e. the 3 UPIRSO criteria), an RNI should be submitted:

1. is unexpected (in terms of nature, severity, or frequency) given the procedures described in the research protocol documents (e.g., the IRB-approved research protocol and informed consent document) and the characteristics of the human subject population being studied;

2. is related or possibly related to participation in the research ("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); and

3. suggests that the research places human subjects or others at a greater risk of harm (including physical, psychological, economic, or social harm) than was previously known or recognized, even if no harm has actually occurred.

In addition, all subsequent follow-up safety reports for that initial report/event for that specific subject/report number, regardless of whether or not they meet the UPIRSO criteria, will need to be submitted as RNIs as well.

Time Frames for Reporting and Submission

Reporting requirements at NU IRB are separated into two distinct categories:

1. Death of an NU/NU Affiliate research participant
2. RNI

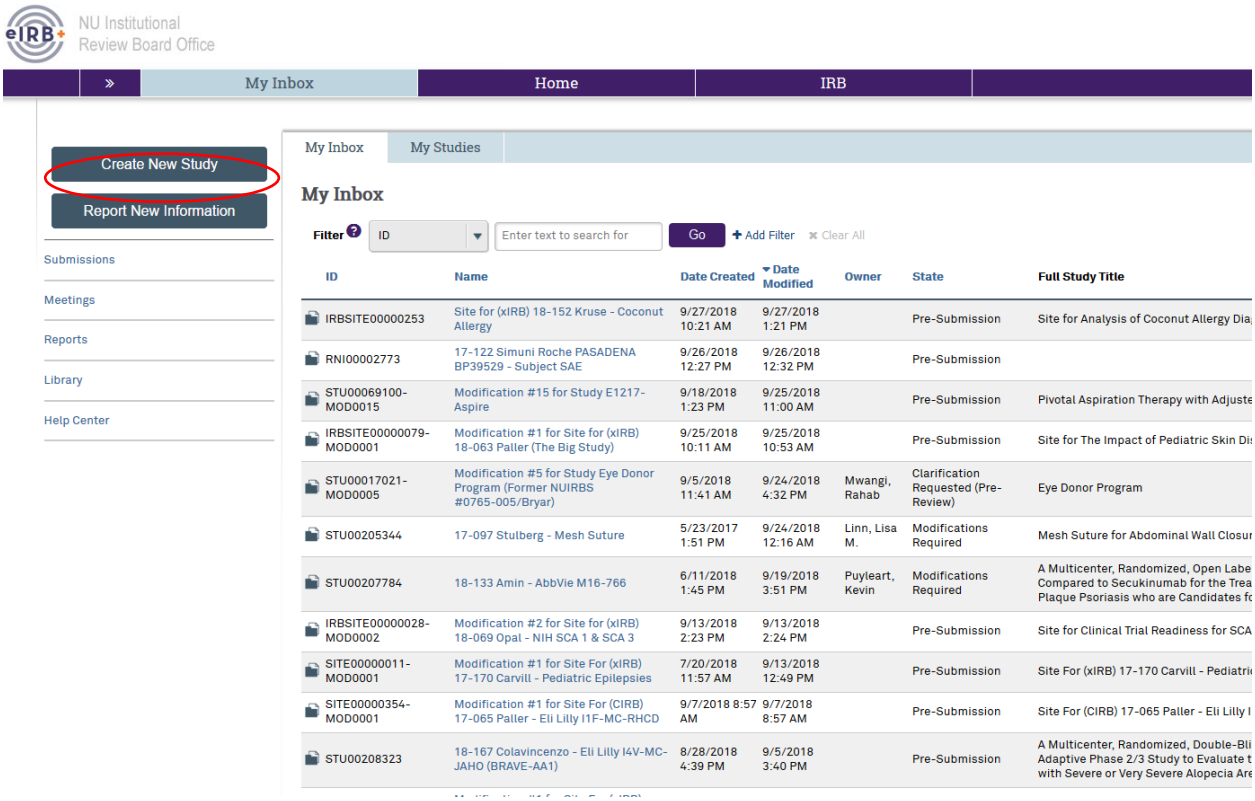
The death of an NU/NU Affiliate research participant for a reason that is unanticipated and related to the research must be reported within **24 hours** of knowledge or notification.
**Reporting the death of non-NU/NU affiliate research participants is not required.
Any of the above events that are considered RNIs must be reported within **5 business days** of knowledge or notification.

Process for RNI Submission, Review, and Acknowledgement

If an event meets the criteria described above and must be reported to the IRB as an RNI, please follow the instructions linked below. For additional information, visit the NU IRB website here: https://irb.northwestern.edu/process/reportable-new-information/preparing-rni-eirb

1. Start the RNI Submission

a. Go to the main page for eIRB+ and log-in. Once in the system you will be brought to your inbox.
b. On the left side of the page, select "Report New Information".



c. You will be brought to the main page of the RNI submission
d. Create an RNI short title – ensure the NUCATS#, PI name, protocol #, sponsor (if applicable), and event are listed in the title
   For example: 18-133 Amin AbbVie M16-766 – Consenting Error
e. Enter the date you became aware of the information/were notified by the study team of an event. Enter the date the PI became aware that the reportable event occurred. This date should be within the appropriate reporting time frame as described above. Please explain any delays that may have occurred between the PI being informed of the reportable event and subsequently informing the regulatory coordinator for submission.

Reportable New Information

1. **RNI short title**: (uniquely identify this new information report)

2. * **Date you became aware of the information**:

f. Select the appropriate category that represents the information (multiple categories can be selected). See section above under RNI Basics for more information.

3. **Identify the categories that represent the new information:** (check all that apply)

Risk: Information that indicates a new or increased risk, or a safety issue. This includes a chance that something bad could happen. For example:

a. New information (e.g., an interim analysis, safety monitoring report, publication in the literature, sponsor report, or investigator finding) indicates an increase in the frequency or magnitude of a previously known risk, or uncovers a new risk.

b. An investigator brochure, package insert, or device labeling is revised to indicate an increase in the frequency or magnitude of a previously known risk, or to describe a new risk.

☐ c. Withdrawal, restriction, or modification of a marketed approval of a drug, device, or biologic used in a research protocol.

d. Protocol violation that harmed subjects or others or that indicates subjects or others might be at increased risk of harm.

e. Complaint of a subject that indicates subjects or others might be at increased risk of harm or at risk of a new harm.

f. Any changes significantly affecting the conduct of the research.

Harm/Death: Any harm (including death) experienced by an NU subject or other individual(s) that, in the opinion of the investigator, is unexpected and at least probably related to the research procedures. **Harms can include psychological, economic, legal, and other non-physical harms.**

a. A participant at the Northwestern site has experienced a severe and unexpected reaction to the study drug. The PI thinks this is possibly related to the study drug.

b. An investigator finds out that the study involves a currently approved drug that may cause renal failure according to newly published literature. An interim analysis or safety monitoring report that indicates that frequency or magnitude of harms or benefits may be different than those initially presented to the IRB.

☐ c. Change in FDA labeling or withdrawal from marketing of a drug, device, or biologic used in a research protocol.

d. An investigator realizes participants have accidentally been given study drug at a higher dose than was approved by the IRB. While no side effects were reported, the increase in dosage placed the subjects at potential risk of harm.

e. Four weeks into the study of a new asthma drug, a participant informs the research staff that she is pregnant although the pregnancy test done at screening was negative. Pregnancy is an exclusion factor in the study.

- ☐ **Audit:** Audit, inspection, or inquiry by a federal agency and any resulting reports (e.g., FDA Form 483).
- ☐ **Report:** Only certain written reports of study monitors must be reported. Prompt reporting (within 5 days) is required for monitoring reports for which the industry sponsor determines the findings could affect the safety of participants or influence the conduct of the study.
- ☐ **Researcher error:** Failure to follow the protocol due to the action or inaction of the investigator or research staff.
- ☐ **Confidentiality:** Breach of confidentiality.
- ☐ **Unreviewed change:** A participant at a non-Northwestern site has experienced a severe and unexpected reaction to the study drug. The sponsor thinks this may be related to the study drug and instructs sites to promptly lower the drug dosage to eliminate an immediate hazard to participants. In this case, the PI should immediately implement the dosage change prior to IRB approval and then submit an RNI to notify the IRB.
- ☐ **Incarceration:** Incarceration of a subject in a study not approved by the IRB to involve prisoners.
- ☐ **Complaint:** Complaint of a subject that cannot be resolved by the research team.
- ☐ **Suspension:** Premature suspension or termination of the research by the sponsor, investigator, or institution.
- ☐ **Unanticipated adverse device effect:** Any serious adverse effect on health or safety or any life-threatening problem or death caused by, or associated with, a device, if that effect, problem, or death was not previously identified in nature, severity, or degree of incidence in the investigational plan or application (including a supplementary plan or application), or any other unanticipated serious problem associated with a device that relates to the rights, safety, or welfare of subjects.
- ☐ **Investigational pharmacy error:** An error involving the investigational pharmacy. If selecting this option, please notify the Investigational Pharmacy at INVdrugser@nm.org to get additional information for your RNI (e.g., Corrective Action Plan). Please click on the help box for more information.
- ☐ **Short Form**: If using a translated short form from the IRB website and the English language consent document as the written summary, the short form consent process may take place prior to IRB review. An RNI should be submitted to the IRB within 10 days, to report the use of the short form consent process. The RNI should contain the documents and confirmations previously described above. Additional guidance on short forms can be found here.

Important! Information that does not fit into one of the categories above does not need to be reported to the IRB as new information.

g. Inform the IRB if the incident occurred at NU or was external from NU.

4. **Where did the incident occur?**
   - ○ NU/NU Affiliate Study Site
   - ○ External to NU

   Clear

Incidents of non-compliance on the part of research participants which do not involve risk need not be reported to the IRB (i.e., failure to turn in medication diary). Examples of Reportable Non-compliance include, but are not limited to, the following:

- a. Human subjects research conducted without IRB approval.
- b. Research personnel do not obtain written consent or assent for a study when the IRB has determined that consent or assent is required for a study that involves the collection of discarded tissue. While no harm occurred, failure to obtain consent/assent is a violation of the research participant's rights.
- c. Enrollment of participants before IRB approval has occurred and/or after IRB approval has lapsed.
- d. Continued treatment of participants after IRB approval has lapsed without first obtaining permission from the IRB.
- e. PI enrolls a participant that does not meet all of the inclusion/exclusion criteria. The criteria that were not met puts the participant at risk of harm.
- ☐ f. Enrollment of children, prisoners, pregnant women and fetuses, without prior IRB approval.
- g. Use of an unapproved consent form.
- h. Use of unauthorized study personnel to conduct study procedures, obtain informed consent, or have access to identifiable participant information.
- i. A required lab test is not done whose omission, in the opinion of the PI, poses risk of harm to participants.
- j. Assessment for any inclusion/exclusion criterion was not done prior to beginning if study procedures. The criteria that were not evaluated prior to study procedures puts the participant at risk of harm.
- k. A procedure, treatment, or visit specified in the protocol is conducted outside of the required time frame and has clinical consequence; poses risk of harm to subject or others; and/or is thought to be impactful to the scientific integrity of the study.

h. Describe the event/new information. Include a brief description (no more than 1- 4 paragraphs) describing the RNI. Be sure to include what occurred, the date that the event occurred, why the event is reportable, and if applicable what is being done as follow-up to the event and/or what is done to make sure it doesn't occur in the future (i.e. the Corrective Action Plan, or "CAP").

5. * Describe the new information:
Within the text box provided, detail the event you are submitting to the IRB, the actions taken to resolve the incident, and how this type of incident will be prevented in the future. If applicable to the event, the description must address the following:
- What happened, when and where?
- What factors and/or who contributed to why it happened?
- What was done to immediately address or correct the issue?
- What is the plan going forward for preventing this from happening again?
- Include NU/NU affiliate participant ID numbers in your description if applicable.

i. Select "yes" or "no" to the following three questions:

5. **In the PI/submitter's opinion:**

a. * **Does this information indicate a new or increased risk, or a safety issue?**
Yes No Clear

b. * **Does the study need revision?**
Yes No Clear

c. * **Does the consent document need revision?**
Yes No Clear

If revisions are required, describe them above and submit a study modification for review.

If you select "yes" to any of the above questions, modifications to study documents (such as the consent) or study procedures may be required by the IRB. These will need to be submitted and reviewed separately. The RNI # should be referenced in each subsequent, related submission for purposes of continuity.

j. Indicate what study(s) the RNI applies to. Find a study by typing in any part of the short title or PI's name. A list of studies will generate; select the study the RNI applies to.

6. * Related studies:

ID	Short Title	Investigator	State
There are no items to display			

6. * Related studies:

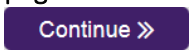
Amin

ID	Name	Organization	PI first name	PI last name	IRB office
STU00204295	(CIRB) 17-022 Amin - UCB PS0011	NU Clinical and Translational Sciences Institute (NUCATS)	Ahmad	Amin	IRB Office
STU00204626	(CIRB) 17-061 - AbbVie M15-997	NU Clinical and Translational Sciences Institute (NUCATS)	Ahmad	Amin	IRB Office
STU00202204	(CIRB) D1472 Gordon - Boehringer Ingelheim 1311.3	NU Clinical and Translational Sciences Institute (NUCATS)	Ahmad	Amin	IRB Office
STU00203891	(CIRB) D1494 Amin - UCB-PS0010	NU Clinical and Translational Sciences Institute (NUCATS)	Ahmad	Amin	IRB Office
STU00206713	18-036 Amin - REALM 1	NU Clinical and Translational Sciences Institute (NUCATS)	Ahmad	Amin	IRB Office
STU00070050	CIRB-(D1372-Eli Lilly)	NU Clinical and Translational Sciences Institute (NUCATS)	Ahmad	Amin	IRB Office
STU00058887	D1362 Amin - Eli Lilly I1F-MC-RHAZ	Northwestern Center for Clinical Research (NCCR)	Ahmad	Amin	IRB Office
STU00203552	D1460 Amin - Corrona-PSO-500 Psoriasis Registry	NU Clinical and Translational Sciences Institute (NUCATS)	Ahmad	Amin	IRB Office

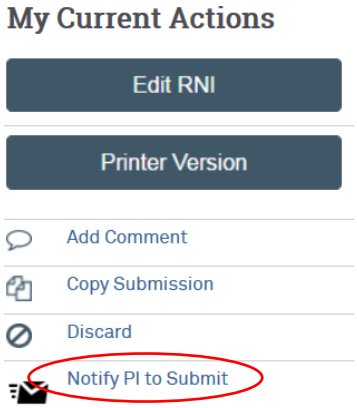
k. Upload any and all supporting information

Attach any additional documents that are relevant to the RNI event. This includes the sponsor-issued safety report/SUSAR document or additional information clarifying the RNI event.

When you are finished completing the RNI submission, select complete in the bottom-right corner of the page to be re-routed to the main study page.

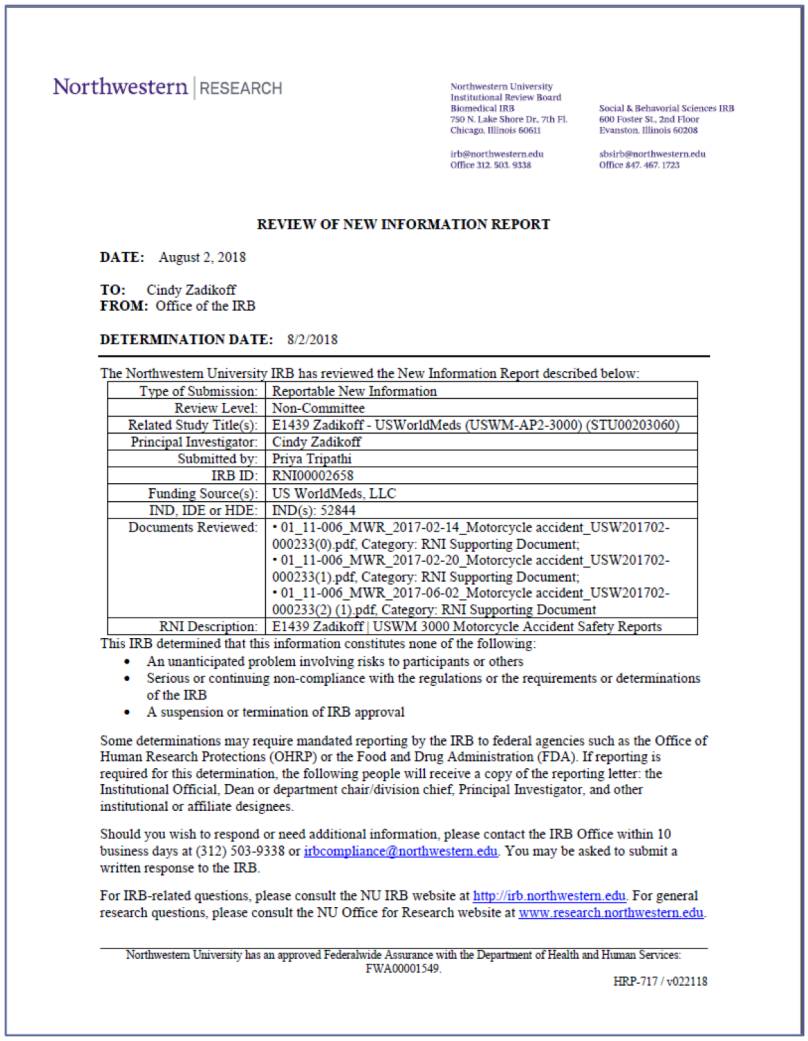


Forward to the PI to submit the RNI.



RNIs are unique submissions because they must be forwarded to the PI to submit and the individual completing the RNI or personnel with proxy are **not** able to initially submit. The individual completing the RNI may submit if subsequently any clarifications are requested by the IRB.

RNI Review: RNIs are not "approved" in the same way that modifications or new study submissions are approved. Instead, RNIs are acknowledged once the IRB panel reviews and all clarification requests have been addressed.



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Biomedical IRB
750 N. Lake Shore Dr., 7th Fl.
Chicago, Illinois 60611

irb@northwestern.edu
Office 312. 503. 9338

Social & Behavorial Sciences IRB
600 Foster St., 2nd Floor
Evanston, Illinois 60208

sbsirb@northwestern.edu
Office 847. 467. 1723

REVIEW OF NEW INFORMATION REPORT

DATE: August 2, 2018

TO: Cindy Zadikoff
FROM: Office of the IRB

DETERMINATION DATE: 8/2/2018

The Northwestern University IRB has reviewed the New Information Report described below:

Type of Submission:	Reportable New Information
Review Level:	Non-Committee
Related Study Title(s):	E1439 Zadikoff - USWorldMeds (USWM-AP2-3000) (STU00203060)
Principal Investigator:	Cindy Zadikoff
Submitted by:	Priya Tripathi
IRB ID:	RNI00002658
Funding Source(s):	US WorldMeds, LLC
IND, IDE or HDE:	IND(s): 52844
Documents Reviewed:	• 01_11-006_MWR_2017-02-14_Motorcycle accident_USW201702-000233(0).pdf, Category: RNI Supporting Document; • 01_11-006_MWR_2017-02-20_Motorcycle accident_USW201702-000233(1).pdf, Category: RNI Supporting Document; • 01_11-006_MWR_2017-06-02_Motorcycle accident_USW201702-000233(2) (1).pdf, Category: RNI Supporting Document
RNI Description:	E1439 Zadikoff | USWM 3000 Motorcycle Accident Safety Reports

This IRB determined that this information constitutes none of the following:

- An unanticipated problem involving risks to participants or others
- Serious or continuing non-compliance with the regulations or the requirements or determinations of the IRB
- A suspension or termination of IRB approval

Some determinations may require mandated reporting by the IRB to federal agencies such as the Office of Human Research Protections (OHRP) or the Food and Drug Administration (FDA). If reporting is required for this determination, the following people will receive a copy of the reporting letter: the Institutional Official, Dean or department chair/division chief, Principal Investigator, and other institutional or affiliate designees.

Should you wish to respond or need additional information, please contact the IRB Office within 10 business days at (312) 503-9338 or irbcompliance@northwestern.edu. You may be asked to submit a written response to the IRB.

For IRB-related questions, please consult the NU IRB website at http://irb.northwestern.edu. For general research questions, please consult the NU Office for Research website at www.research.northwestern.edu.

Northwestern University has an approved Federalwide Assurance with the Department of Health and Human Services: FWA00001549.

HRP-717 / v022118

There are instances in which multiple RNIs for a specific study, or insufficient action taken by the study team described in an RNI, may lead to a need for study revision or an updated corrective action plan. If such a case occurs, the IRB will request a corrective action plan (CAP) and/or any other revision needed in the IRB RNI acknowledgment letter. A new RNI may need to be submitted to address such requests.

The IRB requests the following additional information. This can be submitted as a new RNI (be sure to reference this RNI number in that submission):

1. Provide a detailed corrective action plan, specifically how eligibility criteria is assessed and plans to avoid missed procedures.
2. Also a corrective action plan for the timely submission of RNIs is needed.
3. Please notify the subject of the error and report back to the IRB how the subjects reacted to this information.