



**Walter Reed Army Institute of Research
Standard Operating Procedure**



Appendix D: Fully Convened WRAIR IRB Review of Deviations and Unanticipated Problems	SOP No. UWS-HP-621
	Version .03
Effective Date 3 March 2023	Page 1 of 5

Date:
WRAIR #:
PI/POC:
HSPB POC:
Deviation/UAP/SAE/SUSAR/UADE #:

To Be Filled by HSPB POC

Brief Description of the event:

Brief requirement of the IRB (how would you like the Board to review, what do they need to look at):

Additional Relevant Information (Include the following information: 1) potential impact to subjects and any mitigating factors; 2) historically how have things of this nature been processed; 3) are there any precedents being made as a result of this review; 4) are there previous/concurrent IRB actions related to this issue? :

To Be Filled By IRB Reviewer

Choose one of the two following categories depending on the type of study:

- SAEs/SUSARs/UADEs from a clinical trial (referred from UWS-HP-619) that are both related to study participation and unanticipated in nature. Complete item #2 for determination as a UPIRTSO.**
- AEs that are Unanticipated from non-product studies or UAPs that are potential UPIRTSOs. Complete items #1 and 2 below:**

1. Determination as an Adverse Event:

Did any participant experience:

- | | | |
|--|------------------------------|-----------------------------|
| Untoward/unfavorable medical occurrence? | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| Abnormal signs or symptoms? | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| Disease? | <input type="checkbox"/> YES | <input type="checkbox"/> NO |

If 'Yes' to any of the above, this is an adverse event: continue below to determine whether the adverse event was SERIOUS. If 'No' to all of the above, please continue to 'Determining UPIRTSOs' (number 2 below)



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Appendix D: Fully Convened WRAIR IRB Review of Deviations and Unanticipated Problems	SOP No. UWS-HP-621
	Version .03
Effective Date 3 March 2023	Page 2 of 5

Did the adverse event:

- Result in Death or places the subject at immediate risk of death? YES NO
- Required inpatient hospitalization or prolonged hospitalization? YES NO
- Result in persistent or signification disability or incapacity? YES NO
- Result in congenial anomaly or birth defect? YES NO
- May jeopardize the subject’s health? YES NO
- Require medical/surgical intervention to prevent any of the outcomes listed immediately above? YES NO

If ‘Yes’ to any of the above, this Adverse Event is SERIOUS. Please determine whether the event was related to study participation.

Is the AE Related to study participation or to any study products? YES NO

If yes, then the AE is considered related to the study product or study participation.

Please determine whether the event was anticipated below.

Is the nature, severity, or frequency of the adverse event, occurring in one or more subjects participating in the research, consistent with either:

The known or foreseeable risk of adverse events associated with the procedures involved in the research that are described in (a) the protocol-related documents, such as the IRB-approved research protocol, the current IRB-approved informed consent document, and (b) other relevant sources of information, such as product labeling and package inserts; or YES NO

The expected natural progression of any underlying disease, disorder, or condition of the subject(s) experiencing the adverse event and the subject’s predisposing risk factor profile for the adverse event. YES NO

If either of the statements above are ‘No’, this Adverse Event was UNANTICIPATED. If the adverse event was determined to be Serious, Related, and Unanticipated, then it should be considered as a potential UPIRTSO as per #2.

Notes/discussion points:



**Walter Reed Army Institute of Research
Standard Operating Procedure**



Appendix D: Fully Convened WRAIR IRB Review of Deviations and Unanticipated Problems	SOP No. UWS-HP-621
	Version .03
Effective Date 3 March 2023	Page 3 of 5

2. Determining Unanticipated Problems Involving Risks to Subjects or Others (UPIRTSO)

Was the event/action:

- Unexpected In terms of nature, severity or frequency given the protocol procedures and the subject population? YES NO
- Related or possibly related to a subject's participation in the Research? (Reasonable possibility that the incident, experience or outcome may be been caused by research participation) YES NO
- Suggests the research places subjects or others at a greater risk of harm (physically, psychological, economic or social) than previously known or recognized? YES NO

In order to be considered a UPIRTSO, all three of these must be 'Yes'.

Notes/discussion points:

Complete for potential Major Deviations:

1. Determining Deviations:

Was a change in the protocol conduct implemented without WRAIR IRB approval and authorization by WRAIR Commander? This change may be intentional or unintentional and may stem from actions by any participant in the study, including investigators, subjects or other individuals.

YES NO

If 'Yes', this is considered a deviation. Please determine if the deviation is considered to be a major or minor deviation.

Did the deviation have the potential to:

- Affect rights or welfare of the participants/subjects? YES NO
- Increase risks of participants or others? YES NO
- Change subjects' willingness to continue participation? YES NO
- Compromises the integrity of the study in a way that study objectives cannot be met? YES NO



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Appendix D: Fully Convened WRAIR IRB Review of Deviations and Unanticipated Problems	SOP No. UWS-HP-621
	Version .03
Effective Date 3 March 2023	Page 4 of 5

If 'Yes' to any of the above, this is a **MAJOR DEVIATION**. If determined to be a major deviation, then determine if the major deviation resulted in serious and/or continuing non-compliance in item #2 below.

Notes/discussion points:

2. Non-Compliance:

- Continuing Non-compliance:* A pattern of non-compliance that suggests a likelihood that, without intervention, instances of non-compliance will recur, or that indicates an unwillingness to comply with or a lack of knowledge of Federal and DoD regulations, policy, and law, determinations or requirement of the IRB and/or Headquarters, USAMRDC (HQ USAMRDC) or the research protocol.
- Serious Non-compliance:* Non-compliance that could adversely affect the rights, safety or welfare of participants; place participants at increased risk of harm; cause harm to participants; affect subjects' willingness to participate in research; or damage or compromise the scientific integrity of research data.

If determined to be Serious and/or Continuing Non-compliance, then the major deviation should be reported as outlined in SOP UWS-HP 606, Non-compliance Procedures.

Notes/discussion points:

3. DECISION:

The WRAIR IRB determined this/these event(s) to be:

- Adverse Event(s) not Product Related
 - Unanticipated, Related, and Serious (UPIRTSO)
 - Not Reportable as an UPIRTSO
- SAEs/SUSARs/UADE from Clinical Trials
 - Unanticipated, Related, and Serious (UPIRTSO)
 - Not Reportable as an UPIRTSO



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Appendix D: Fully Convened WRAIR IRB Review of Deviations and Unanticipated Problems	SOP No. UWS-HP-621
	Version .03
Effective Date 3 March 2023	Page 5 of 5

- Unanticipated Problem
 - Reportable as an UPIRTSO
 - Not Reportable as an UPIRTSO

- Deviation
 - Major
 - Minor (if minor deviation, then there is no serious or continuing non-compliance)

- Non-Compliance
 - Serious
 - Continuing

Requiring the following corrective action (as applicable):

IRB Reviewer Signature

Date