

	Office of Sponsor and Regulatory Oversight	Document #: 3A
	Serious Adverse Event Reporting: Frequently Asked Questions	Revision #: 2
		Effective Date: 18NOV2019

As of August 1, 2019, the Office of Sponsor and Regulatory Oversight (OSRO) began receiving and processing Serious Adverse Event (SAE) reports for clinical trials conducted under the Center for Cancer Research (CCR) or OSRO sponsored Investigational New Drug (IND) or Investigational Device Exemption (IDE).

The following Frequently Asked Questions (FAQs) are meant to address questions that have been raised around the reporting of SAEs to OSRO.

Questions

1. [Do I need to send SAEs to OSRO for all clinical trials conducted in CCR?](#)
2. [Where do I need to send the SAE form?](#)
3. [Is there anything else that needs to be sent with the SAE form?](#)
4. [Do I need to send all the medical records with the SAE form?](#)
5. [Do I need to use encrypted e-mail to send the SAE form and other requested documents?](#)
6. [What form should I use to report SAE?](#)
7. [Where can I find the OSRO SAE form?](#)
8. [Who should sign the SAE form?](#)
9. [The timeframe for reporting had been changed to reporting within 24 hours of awareness of the event. Why?](#)
10. [I am the PI of the protocol; I should be able to determine whether an SAE would require changes in the protocol. Why would that determination be made by OSRO?](#)
11. [Does anyone look at SAEs sent over the weekend and holidays?](#)
12. [I just got a call from a family member telling me a participant has been hospitalized. Am I now aware of the event? Does the 24 hours clock start now?](#)
13. [Do I need to provide all the information requested on the form?](#)
14. [Do I need to provide an attribution causality assessment on the form?](#)
15. [Can an e-mail notification be sent over the weekend instead of the form?](#)
16. [I am sending copies of the medical record. Do I need to redact them?](#)
17. [Is there any e-mail format that I need to follow?](#)
18. [What notification will I expect to receive from OSRO?](#)
19. [When do I need to send follow-up SAEs?](#)

	Office of Sponsor and Regulatory Oversight	Document #: 3A
	Serious Adverse Event Reporting: Frequently Asked Questions	Revision #: 2
		Effective Date: 18NOV2019

20. [When we submitted the SAE there was no diagnosis available, but only a list of signs and symptoms. Now there is a diagnosis. How this should be handled?](#)
21. [Do the OSRO medical monitors have access to CRIS?](#)
22. [Do I need to report death due to disease progression as an SAE?](#)
23. [Do I need to report hospitalization for elective surgery as an SAE?](#)
24. [Mortality is an outcome measure in my protocol. The protocol does not require reporting deaths as SAEs. A participant experienced a severe allergic reaction, minutes after receiving the investigational product and despite all efforts had died. Do I need to report this as SAE?](#)
25. [If the hospitalization was less than 24 hours, do I need to report it as a SAE?](#)
26. [I have received CIOMS reports from OSRO safety, what are these reports?](#)

Answers

1. Do I need to send SAEs to OSRO for all clinical trials conducted in CCR?

No. Only send SAEs that happen under clinical trials for which CCR is the IND or IDE sponsor.

[\[RETURN to TOP\]](#)

2. Where do I need to send the SAE form?

Follow the instruction listed in your approved protocol. In the future all SAEs will be sent to OSROSafety@mail.nih.gov; however, until your protocol is amended follow the instruction in the approved protocol.

[\[RETURN to TOP\]](#)

3. Is there anything else that needs to be sent with the SAE form?

If not provided on the form, attach a list of concomitant medications at the time of the event, provide baseline History and Physical (H&P) and baseline lab results. Provide diagnostic test results (pertinent positive and negative) conducted as part of the SAE evaluation and baseline results for these diagnostic tests, if available. If the event is hospitalization, then provide the discharge summary when it is available.

[\[RETURN to TOP\]](#)

	Office of Sponsor and Regulatory Oversight	Document #: 3A
	Serious Adverse Event Reporting: Frequently Asked Questions	Revision #: 2
		Effective Date: 18NOV2019

4. Do I need to send all the medical records with the SAE form?

No. Please only send the requested information (see question number 3). Please send summary note and consultation notes as they relate to the evaluation of the SAE. The OSRO medical monitor may request additional medical records if necessary.

[\[RETURN to TOP\]](#)

5. Do I need to use encrypted e-mail to send the SAE form and other requested documents?

No. The SAE form should not include any Personal Identifiable Information (PII). The supporting documentation needs to be redacted to remove any PII. There is no reason to use encrypted e-mail.

[\[RETURN to TOP\]](#)

6. What form should I use to report SAE?

Unless the protocol instructs you otherwise, use the OSRO SAE form.

[\[RETURN to TOP\]](#)

7. Where can I find the OSRO SAE form?

The OSRO SAE report form is located on the CCR website. Open “CCR Clinical Operations” Home Page at the following link <https://ccrod.cancer.gov/confluence/display/CCRCRO/Home>. Click on option #12 “CCR IND/IDE Management” and in the new page click on “CCR SAE Report Form.” Instructions are provided in a separate file, CCR SAE Report Form Instructions.

[\[RETURN to TOP\]](#)

8. Who should sign the SAE form?

The SAE form should be signed by the person assessing the event. The qualified person to assess SAE is a licensed physician listed on Form 1572 as the PI or sub-PI.

[\[RETURN to TOP\]](#)

	Office of Sponsor and Regulatory Oversight	Document #: 3A
	Serious Adverse Event Reporting: Frequently Asked Questions	Revision #: 2
		Effective Date: 18NOV2019

9. The timeframe for reporting had been changed to reporting within 24 hours of awareness of the event. Why?

The regulations require the investigator to report serious adverse events immediately (21CFR312.64). OSRO defines “immediately” as within 24 hours of awareness.

Timely reporting of SAEs is required to ensure the safety of participants (i.e., whether changes in the protocol are necessary or whether the study needs to be halted), and to ensure CCR meets the FDA requirements of timely reporting.

[\[RETURN to TOP\]](#)

10. I am the PI of the protocol; I should be able to determine whether an SAE would require changes in the protocol. Why would that determination be made by OSRO?

While the PI is aware of the safety events in his/her protocols, the same intervention/ or study mechanism of action (i.e; check point inhibitors) is used across other CCR IND hold protocols. As OSRO is the hub for receiving all safety information (SAE events, IBs, SUSARs, etc.) the knowledge will allow for better assessment of the event. [\[RETURN to TOP\]](#)

11. Does anyone look at SAEs sent over the weekend and holidays?

Yes. The safety mail box is monitored over weekends and holidays.

[\[RETURN to TOP\]](#)

12. I just got a call from a family member telling me a participant has been hospitalized. Am I now aware of the event? Does the 24 hours clock start now?

The 24 hours clock starts when there is basic information available to assess the event as meeting the protocol defined SAE criteria, and to potentially act upon it. At a minimum, a diagnosis or constellation of signs and symptoms need to be known before the assessment can be made and the clock starts. However, you may not have enough information to determine potential causality. Based upon the data you have, provide a causality assessment. This assessment may be modified in a follow-up report as more medical data becomes available to you.

[\[RETURN to TOP\]](#)

	Office of Sponsor and Regulatory Oversight	Document #: 3A
	Serious Adverse Event Reporting: Frequently Asked Questions	Revision #: 2
		Effective Date: 18NOV2019

13. Do I need to provide all the information requested on the form?

OSRO expects that all the requested information on the form and the supporting documentation will be sent with the SAE form. OSRO realizes that not all information will be easily accessible after hours or over a weekend or holiday. At a minimum the description of the event including any relevant diagnostic information, a clinical summary of the history of the participant and other information required to assess the case (e.g., key baseline labs, diagnosis, changes in dosing, etc.) should be provided. Remember that while the reporter will know the participant well, the OSRO medical monitor only knows the participant from the information provided. If less than the full information is sent, then the incomplete form should be captured as a protocol non-adherence. Make sure the narrative includes a rationale to support the causality (attribution) determination related to the study interventions that were administered.

[\[RETURN to TOP\]](#)

14. Do I need to provide an attribution causality assessment on the form?

Yes. Causality assessment for all SAEs needs to be conducted and recorded regardless of relatedness. Causality assessment may change over time as more medical data becomes available.

[\[RETURN to TOP\]](#)

15. Can an e-mail notification be sent over the weekend instead of the form?

The protocol requires utilization of the SAE form. OSRO will act upon information received not utilizing the form; however, this is a protocol non-adherence and should be reported as such. OSRO requires all the information that would otherwise be on the form to be present in the alternative mode of communication (see also question 13).

[\[RETURN to TOP\]](#)

16. I am sending copies of the medical record. Do I need to redact them?

Yes. All information sent to OSRO should not include PII. Redact all PII from the medical record and replace them with the protocol number and participant number.

[\[RETURN to TOP\]](#)

17. Is there any e-mail format that I need to follow?

Please include the protocol number and the participant number in the e-mail message.

[\[RETURN to TOP\]](#)

	Office of Sponsor and Regulatory Oversight	Document #: 3A
	Serious Adverse Event Reporting: Frequently Asked Questions	Revision #: 2
		Effective Date: 18NOV2019

18. What notification will I expect to receive from OSRO?

You will receive an email confirmation that OSRO Safety has received the SAE report. Once the assessment has been completed you will either receive queries about the case or a copy of the sponsor assessment.

[\[RETURN to TOP\]](#)

19. When do I need to send follow-up SAEs?

Submit follow up reports when new information or relevant updates related to a previous report is available. The new information should raise to the level of potentially changing the causality assessment or provide new information that supports the diagnosis and/or causality assessment. We advise not to submit a follow-up report for diagnostic results that are not relevant in supporting the diagnosis and/or causality assessment. Follow the protocol to determine if abnormal tests should be collected as adverse events.

The following are examples of when a new follow-up report is required:

- a) When a clinically pertinent diagnostic test and result are available;
- b) When a discharge summary and/or autopsy report is available;
- c) Worsening of the condition;
- d) Change in diagnosis;
- e) A unifying diagnosis instead of signs and symptoms;
- f) Change in causality assessment;
- g) Final outcome (death, event is resolved, resolved with sequela or considered to be on chronically ongoing) is available

If during the diagnostic evaluation a new condition is discovered then you will need to assess whether this is a new event (distinct from the original SAE), or part of the same event. If it is part of the same event, describe it in the follow-up narrative and do not submit the information as a new SAE. If the event is distinct from the original SAE, the new event should be submitted on a new SAE form.

[\[RETURN to TOP\]](#)

20. When we submitted the SAE there was no diagnosis available, but only a list of signs and symptoms. Now there is a diagnosis. How this should be handled?

Submit a follow-up SAE report. On the form delete previously reported sign and symptoms, and record only the diagnosis as the event term. In the "Description of the SAE" section, indicate that the signs and symptoms are replaced with a unified diagnosis. The grade of the event and attributions may also be changed based on supporting evidence from further evaluation since the initial report was submitted.

[\[RETURN to TOP\]](#)

	Office of Sponsor and Regulatory Oversight	Document #: 3A
	Serious Adverse Event Reporting: Frequently Asked Questions	Revision #: 2
		Effective Date: 18NOV2019

21. Do the OSRO medical monitors have access to CRIS?

No. The OSRO medical monitors do not have access to CRIS. They receive information from the SAE form and the supporting documentation sent by the study team.

[\[RETURN to TOP\]](#)

22. Do I need to report death due to disease progression as an SAE?

You need to follow the protocol as written. If an event is also captured as an end-point, it can be waived from expedited reporting requirements under certain conditions. However, those should be described in the protocol. OSRO can work with the study team to outline appropriate language in the protocol. You must follow the IRB regulations independently from the SAE reporting to OSRO.

[\[RETURN to TOP\]](#)

23. Do I need to report hospitalization for elective surgery as an SAE?

You need to follow the protocol as written. If the protocol allows elective hospitalization to be waived from expedited reporting requirements, then you do not need to report the hospitalization as an SAE. However, the diagnosis that led to the hospitalization needs to be assessed to determine whether it is a new event, and whether it meets any other SAE criteria in the protocol.

[\[RETURN to TOP\]](#)

24. Mortality is an outcome measure in my protocol. The protocol does not require reporting deaths as SAEs. A participant experienced a severe allergic reaction, minutes after receiving the investigational product and despite all efforts had died. Do I need to report this as SAE?

Yes. Despite mortality being an end-point in the study, events that are suspicious for being caused by the investigational product, need to be reported as an SAE.

[\[RETURN to TOP\]](#)

25. If the hospitalization was less than 24 hours, do I need to report it as a SAE?

Yes, hospitalization less than 24 hours needs to be reported, if the patient was admitted as an inpatient and discharged. Unless the protocol specifically states planned hospitalizations do not require reporting, any admission for hospitalization (regardless of period of time, including less than 24 hours) requires SAE reporting.

[\[RETURN to TOP\]](#)

	Office of Sponsor and Regulatory Oversight	Document #: 3A
	Serious Adverse Event Reporting: Frequently Asked Questions	Revision #: 2
		Effective Date: 18NOV2019

26. I have received CIOMS reports from OSRO safety, what are these reports?

The CIOMS reports are the IND sponsor summary of the SAE based on the SAE report(s), PI assessment and sponsor assessment (OSRO Medical Monitor). The CIOMS is provided to the PIs and to pharmaceutical collaborators as applicable. The study team is not required to take an action. Follow up CIOMS reports are issued when new information is received on SAE follow up reports you send in. The PSO office is copied on the CIOMS reports and will file them in the site regulatory folders.

[\[RETURN to TOP\]](#)