Serious Adverse Event Reporting

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Contact SWOG SAE Team

- Contact SWOG first with all SAE questions, including technical support issues.
  - SAE Email: adr@swog.org
  - SAE Phone: 210-614-8808, Option 6
## Attribution

<table>
<thead>
<tr>
<th>RELATIONSHIP</th>
<th>ATTRIBUTION</th>
<th>DESCRIPTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unrelated to Investigational Agent / Intervention</td>
<td>Unrelated</td>
<td>The AE is clearly <strong>NOT</strong> Related to the intervention</td>
</tr>
<tr>
<td>Unlikely</td>
<td>Unlikely</td>
<td>The AE is <strong>Doubtfully</strong> Related to the intervention</td>
</tr>
<tr>
<td>Related to Investigation Agent / Intervention</td>
<td>Possible</td>
<td>The AE <strong>May be</strong> Related to the intervention</td>
</tr>
<tr>
<td>Probable</td>
<td>Probable</td>
<td>The AE is <strong>Likely</strong> Related to the intervention</td>
</tr>
<tr>
<td>Definite</td>
<td>Definite</td>
<td>The AE is <strong>Clearly</strong> Related to the intervention</td>
</tr>
</tbody>
</table>
SAE Reporting Criteria Found In:

Section 8  OR  Section 16
Example of SAE Reporting Criteria for Investigational Agents

**Step 1:** Is the AE serious?

**Step 2:** If serious, how quickly does it need to be reported?

**Step 3:** If it’s been > 30 days since the patient last received investigational study drug, refer to the bottom of the SAE Table.
## SAE Reporting Table

Example of SAE Reporting Criteria for Commercially Available Agent

<table>
<thead>
<tr>
<th>Attribution</th>
<th>Grade 4</th>
<th></th>
<th>Grade 5&lt;sup&gt;a&lt;/sup&gt;</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Unexpected</td>
<td>Expected</td>
<td>Unexpected</td>
</tr>
<tr>
<td>Unrelated or Unlikely</td>
<td></td>
<td></td>
<td>CTEP-AERS</td>
</tr>
<tr>
<td>Possible, Probable,</td>
<td>CTEP-AERS</td>
<td></td>
<td>CTEP-AERS</td>
</tr>
<tr>
<td>Definite</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

CTEP-AERS: Indicates an expedited report is to be submitted via CTEP-AERS within 10 calendar days of learning of the event.<sup>b</sup>

<sup>a</sup> This includes all deaths within 30 days of the last dose of treatment with a commercial agent(s), regardless of attribution. Any death that occurs more than 30 days after the last dose of treatment with a commercial agent(s) and is attributed (possibly, probably, or definitely) to the agent(s) and is not due to cancer recurrence must be reported according to the instructions above.

<sup>b</sup> Submission of the on-line CTEP-AERS report plus any necessary amendments generally completes the reporting requirements. You may, however, be asked to submit supporting clinical data to the Operations Office in order to complete the evaluation of the event. If requested, the specified data should be sent within 5 calendar days by fax to 210-614-0006.

Grade 4, Unexpected, and Possibly, Probably, Definitely Related  
OR  
Grade 5
16.1 Adverse Event Reporting Requirements

f. Additional Instructions or Exceptions to CTEP-AERS Expedited Reporting Requirements for Phase 1 and Early Phase 2 Studies Utilizing an Agent under a CTEP-IND:

1) Group-specific instructions.

Submission of the on-line CTEP-AERS report plus any necessary amendments generally completes the reporting requirements. In addition, you may be asked to submit supporting clinical data to the SWOG Operations Offices in order to complete the evaluation of the event. If requested, the supporting data should be sent within 5 calendar days by fax to 216-614-0006. Supporting clinical data submitted should include:

- Printed copy of the first page of the CTEP-AERS Report
- Copies of clinical sourced documentation of the event
- If applicable, and they have not yet been submitted to the SWOG Data Operations Center copies of Off Treatment Notice and/or Notice of Death.

2) The adverse events listed below also require expedited monitoring for this trial:

- Thromboembolic events, any Grade regardless of attribution

3) For study arm(s) applicable study arm(s), the adverse events listed below do not require expedited reporting via CTEP-AERS:

- ≤ Grade 4 myelosuppression
- ≤ Grade 4 Infection
SPEER

- SPEER = Specific Protocol Exceptions to Expedited Reporting
- This subset of AEs (SPEER) is a list of events that are protocol-specific exceptions to expedited (SAE) reporting to NCI.
- Report AEs on the SPEER as SAEs only if 1) they exceed the grade noted in parentheses next to the AE in the SPEER and 2) the AE is serious.
- If the protocol uses multiple investigational agents and has an AE listed on different SPEERs, use the lower of the grades to determine if expedited reporting is required.
Reminder that the SPEER column only applies to SAE reporting. It does not apply to routine AE reporting.
SAEs and Audits

- **SAEs Reported Late**
  - If no date of discovery is provided, SWOG uses the date the report was submitted to SWOG minus the date of event to determine late reporting.
  - If the date of discovery is different from the date of the event, please enter it in CTEP-AERS Section 3: Describe Event.

- **SAEs Reportable to Local Institutional Review Board (IRB)**
  - Varies due to local IRB guidelines. Check with your IRB.

- **SAEs Reportable to NCI Central Institutional Review Board (CIRB)**
  - Use the CIRB algorithm to determine reporting.
CIRB Algorithm for Potential Unanticipated Problems

1. Was the protocol followed as written? 
   - Yes
   - No → Review for potential noncompliance

2. Is the incident, experience or outcome unexpected (in nature, severity or frequency) per the CIRB's definition? 
   - Yes
   - No

3. Is it related or possibly related to the research? 
   - Yes
   - No → This is not an unanticipated problem

4. Is there any indication that the experience, incident or outcome places participants or others at greater risk of harm than previously recognized? 
   - Yes
   - No

Result: This is a potential unanticipated problem and should be reported to the CIRB.
Rave is recommending an SAE report, but the recommendation does not match the SAE reporting requirements in the protocol. Should an SAE report be submitted based on the recommendations in Rave?

- The Rave recommendations are based on very basic rules and are often incorrect. SAEs should be submitted per protocol guidelines. 
  
  adr@swog.org can be contacted anytime for guidance.
What is the deadline for submitting an SAE report to SWOG?

- Reporting timeframes are found in the SAE reporting tables within the protocol. SAE tables are found in Section 8 or Section 16 of the protocol.
- It is important to note that the ‘submission due dates’ in Rave or in the automated CTEP-AERS emails are not true deadlines; these dates only reflect the date after which CTEP-AERS will automatically delete unsubmitted reports.
- SWOG makes every effort to notify sites if they have a pending report that will soon be deleted, but sites are responsible for reporting within protocol-specified timeframes.
When a patient is on a treatment arm with both investigational and commercial agents, should both the investigational and commercial SAE reporting tables be used to determine reporting timeframes?

- No - when a commercial agent is used on the same treatment arm as an investigational agent, the entire combination is then considered an investigational intervention. In this situation, only the investigational SAE reporting table should be used to determine expedited reporting.

Source: National Cancer Institute. (2013). Adverse Event Reporting Requirements for DCTD (CTEP and CIP) and DCP INDs and IDEs [PDF], Section 5.4.
Announcements
March 25, 2020:
Document COVID-19 related adverse events as follows:
Infections and infestations - Other, specify
Specify = COVID-19
Click here for additional details.

September 20, 2021:
Rave/CTEP-AERS Integrated Studies: CTEP-AERS direct reporting (bypassing Rave and starting a report directly in CTEP-AERS) is no longer allowed. Please log into Rave, proceed with your AE reporting and use the hyperlink to access CTEP-AERS for SAE reporting. If you experience any technical issues while initiating the SAE report, please contact the CTSU Helpdesk at ctsucontact@westat.com or by phone at 1-888-823-5923 immediately.
Click here for additional details.
SAE Resources

- **SWOG SAE TEAM**
  - Contact first with all SAE questions, including technical support issues.
    - SAE Email: adr@swog.org
    - SAE Phone: 210-614-8808, Option 6

- **NCI Guidelines for Investigators: Adverse Event Reporting Requirements**
- **Information on the CTEP-AERS application**
- **Information on the Rave/CTEP-AERS integration**
  - Please contact adr@swog.org with any integration questions/issues