University Hospitals Clinical Research Center

UH CLINICAL RESEARCH CENTER
11100 Euclid Avenue, Lakeside 1400
Cleveland, Ohio 44106
ClinicalResearch@UHhospitals.org

Protocol Deviations and Important Protocol Deviations

Protocol Deviation: any change, divergence, or departure from the study design or procedures defined in the protocol. It includes the key principles:

- An occurred event (e.g., not theoretical);
- The event is related to the protocol or documents referenced in the protocol (e.g., laboratory manual)
- The event is independent of fault, blame, or circumstance – to ensure an objective approach to identification. (e.g., sample tube broke en route to central laboratory; participant refused a procedure)

Protocol Deviations should be reported on a Protocol Deviations log in real time and reported to the UH IRB in Continuing Review Submissions

Important Protocol Deviation, Major Protocol Deviation, or Protocol Violation: a subset of protocol deviations that may significantly affect a subject's rights, safety, or well-being **or** that may significantly impact the completeness, accuracy, and/or reliability of key study data.

- For example, important protocol deviations may include enrolling subjects in violation of key eligibility criteria or failing to collect data necessary to interpret primary endpoints, as this may compromise the scientific value of the trial
- **Important Protocol Deviations should be reported as soon as possible to the UH IRB via the Report New Information (RNI) button in SpartaIRB and documented on the Protocol Deviations log**

GCP Compliance Issues

- Not all GCP compliance issues are protocol deviations, for instance:
  - No PI signature on the Delegation Log
  - Principal Investigator not available during an on-site monitoring visit
  - Participant's name misspelled within a source document
- Examples of GCP compliance issues, which **may** be important protocol deviations include:
  - Study participant received expired investigational product
  - Key or critical study procedures performed by study site staff without the appropriate qualifications or training

Best ways to identify protocol deviations:

- Include some non-critical data points (data not important to meeting study endpoints) in the database to catch any potential protocol deviations during data entry
- Use an internal quality assurance checklists (Internal QA Checklist – Regulatory & Internal QA Checklist – Participant) to find any potential protocol deviations

Additional Resources:

- Transcelerate Protocol Deviations
- Protocol Deviations Log - Template
- Clinical Research - The Basics, Module 8: Adverse Events & Protocol Deviations (GPS Module)
  - UH Employee | Research Credentialed & Self-Registration Users