

Changes in approved research require prior IRB review and approval, except where necessary to eliminate apparent immediate hazard to participants.

1.0 Applicable changes requiring review

The requirement for prior approval applies to all categories of human research protocols, including exemption determinations, where changes are proposed to any aspect of the human subjects portion of the research originally approved by the IRB. These may include, but are not limited to, changes in:

- investigator(s), or research team members
- research site(s)
- subject population, inclusion or exclusion criteria
- recruitment process or documentation
- informed consent process or documentation
- intervention(s), data collection methods, or compensation scheme
- survey measures or interview questions
- confidentiality procedures

When a number of significant changes are proposed to a protocol, it may be advisable to submit a new protocol for review.

2.0 Protocol amendment submission process:

The investigator submits the *Protocol Amendment Request* form, signed by the principal investigator, describing the proposed change(s) and justification as appropriate. A revised protocol form, with changes highlighted in the relevant sections, is also required to maintain an accurate and complete record of the currently approved IRB protocol. Additionally, revised informed consent documents, survey instruments or recruitment materials, are required where applicable.

3.0 IRB review process:

3.1 Pre-review procedures.

Qualified HRPP staff screen the amendment submission to ensure investigator training documentation is current, and the application is complete, including any relevant attachments. Investigators may be contacted to provide any missing information prior to review, and/or notified of any applicable training documentation required for approval. All communication is documented in the protocol file.

3.2 Exempt status protocols.

Qualified HRPP staff, IRB chair or designee review amendment requests to verify that the proposed change(s) would not disqualify the research for one or more categories of exemption, and that protection of the rights, safety and welfare of participants will be maintained. One or more of the following actions may be taken:

3.2.1 Approved as submitted.

HRPP staff may determine that the amendment request is approvable as submitted. A written notice is sent to the investigator; the change may be implemented upon receipt of this notice.

3.2.2 Not approvable as submitted.

HRPP staff may determine that the proposed amendment is not approvable as submitted. If the proposed change(s) would render the research ineligible for exempt status; expedited or full review will be required, as described below. Additional information or revisions may be required in order to grant approval, and/or current or past participants may need to be notified (if the change would alter their previous understanding of the research, or affect their willingness to continue in the research).

HRPP staff notify the investigator in writing, providing an explanation of the determination and any additional information or revisions that are required for approval of the amendment. Once the responsive material from the investigator meets the requirements for approval, HRPP staff send written notice of approval to the investigator; the change may then be implemented upon receipt of the written notice.

3.3 Expedited review.

Protocol amendments may undergo expedited review by the IRB chair, or one or more experienced IRB members, as described in 7.3 *Expedited Review*. Qualified HRPP staff, in consultation with the IRB chair or designee, determine eligibility of the proposed amendment for expedited review.

3.2.1 Protocols previously reviewed by the expedited method.

Proposed changes to protocols previously reviewed by the expedited method may also be reviewed by the expedited method as long as no more than minimal risks are involved, and the proposed change would meet criteria under one or more of the eligible categories.

3.2.2 Minor changes to protocols previously reviewed by the full board.

Minor changes to protocols that were previously reviewed at a convened meeting may undergo expedited review, regardless of the level of risk category initially assigned by the IRB. Minor changes are those that do not involve risks that are more than minimal, or significantly change the aims or design of the study.

When the IRB determines that a proposed change constitutes more than a minor change, full board review will be required in order to ensure compliance and adequate safeguards for participants.

In accordance with Section 7.3 *Expedited Review*, the IRB Chair or designee, or other experienced member reviews the proposed amendment, utilizing the criteria described in 3.5 below, including verification that the amendment is eligible for expedited review.

3.4 Full board review.

At a convened meeting, the IRB reviews proposed amendments that are more than minor, or increase the level of risk to more than minimal. The IRB utilizes the criteria as described in 3.5 below. Refer to 7.4 *Full Board Review* for procedures, including the assignment of primary reviewers. Amendment forms are due 10 business days prior to the next scheduled IRB meeting.

3.5 IRB review criteria.

Using the applicable review process as previously described, the IRB reviews the proposed amendment(s) to determine whether or not the proposed change(s) to the research would:

- alter the original risk:benefit ratio of the research
- satisfy the criteria for approval, as described in Section 7.2 *Criteria for Approval*
- require notification to current or prior participants (if change would alter their understanding of the research, and/or their willingness to remain enrolled)
- satisfy any additional specific determinations required for waiver or alteration of the consent process or documentation, or inclusion of vulnerable groups

4.0 IRB actions and notification.

Several outcomes of IRB review are possible:

4.1 Approved as submitted.

The IRB may determine that the proposed amendment is satisfactory as presented, and meets all required criteria for approval. IRB Chair or designee, or designated reviewer or HRPP staff sign approval of the amendment. HRPP staff forward a copy of the signed approved amendment to the investigator for their records; the change may then be implemented upon receipt of this notification.

4.2 Minor modifications required for approval.

The IRB may determine that the criteria for approval of the amendment can only be met if certain revisions and/or additional clarification or documentation are provided. Qualified HRPP staff notify the investigator in writing, outlining the revisions and/or additional documentation or clarification required for approval. Upon receipt, the revised amendment application is forwarded to the IRB Chair, designee, or designated reviewer. If determined to be acceptable, HRPP staff notify the investigator of approval as described in 4.1 above. If an investigator fails to respond within a reasonable period of time (about 30 days), the protocol amendment is considered inactive and withdrawn.

4.3 Deferred.

The IRB may determine that the amendment request contains insufficient information, and/or would require substantive modifications in order to meet the criteria for approval. Qualified HRPP staff notify the investigator in writing, outlining the reasons for deferral, and including a description of the additional information or revisions needed for review. Upon receipt of the additional information, the amendment is forwarded for another review, as in 3.0 above.

4.4 Not approved.

The IRB may determine that the amendment request does not meet the criteria for approval, and would place participants at unacceptable levels of risk. Qualified HRPP staff notify the investigator in writing, outlining the reasons for the disapproval. An amendment request may only be disapproved by the full board at a convened meeting; designated reviewers performing expedited review may defer, but not disapprove, an amendment request.

The IRB is notified of amendments approved by the exempt and expedited procedures with an attachment to the agenda for the next convened meeting. All members have an opportunity to review the list and ask questions about the actions performed outside of full board deliberations.

5.0 Approval period:

IRB review and approval of a protocol amendment allows implementation of a change to the research, but does not alter the current approval period for the research. Where applicable, investigators remain responsible for submission of a continuing review report by the due date specified on the IRB approval letter or prior continuing review approval.

6.0 Immediate change required to eliminate hazard to participants:

In some situations, the investigator may need to quickly implement changes to research in order to protect participants from apparent immediate hazards. These changes do not require prior approval of the IRB, but must be reported to the IRB within 72 hours, utilizing the *Report of Unanticipated Problems and Serious Adverse Events* form. Refer to Section 7.7 *Unanticipated Problems and Serious Adverse Events* for more information.

DEFINITIONS:

Minimal risk: the probability and magnitude of harm or discomfort anticipated in the research are not greater in and of themselves than those ordinarily encountered in daily life or during the performance of routine physical or psychological examinations or tests.

Minor change: a change that would *not* involve risks that are more than minimal, or significantly change the aims or design of the study. Examples of minor changes would include, but are not limited to:

- addition of investigators, research team members, or research sites
- editorial changes to consent forms, surveys, measures or questionnaires for purposes of clarification
- minor study design changes that do not negatively impact the risk/benefit ratio

REFERENCES:

[FederalWideAssurance Terms](#)

[45CFR46.103\(b\)\(4\)](#) Written IRB procedures

[21CFR56.108\(a\)](#) IRB functions and operations

[45CFR46.109](#) and [21CFR56.109](#) IRB review of research

[45CFR46.110](#) and [21CFR56.110](#) Expedited review procedures

[45CFR46.111](#) and [21CFR56.111](#) Criteria for IRB approval of research

[OHRP guidance on Written Procedures](#)

[Categories of Research Eligible for Expedited Review](#)

RELATED FORMS:

Protocol Amendment Request Form

RELATED HRPP SECTIONS:

7.1 Exemption Determinations

7.2 Criteria for IRB Approval

7.3 Expedited Review

7.4 Full Board Review

7.7 Unanticipated Problems and Serious Adverse Events