

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 exempt 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:

- research site(s),
- participant population, inclusion or exclusion criteria,
- recruitment process or materials,
- informed consent process or document,
- intervention(s), data collection methods, or compensation strategy,
- survey measures or interview questions,
- confidentiality procedures,
- changes in research personnel.

If 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:

To start an amendment, the investigator clicks the Yellow button at the top of the approved Protocol to start an amendment. Make changes within the protocol application and upload any revised informed consent documents, survey instruments or recruitment materials, as applicable. If the amendment is submitted by a co-investigator, the PI is automatically notified of the need to Certify. CITI training must be current for all members of the research team in order for the amendment to be reviewed.

### 3.0 IRB review process:

#### 3.1 Pre-review procedures.

Qualified HRPP staff screen the amendment submission to ensure the amendment request is complete, including any relevant attachments. Investigators may be contacted to provide any missing information prior to review.

#### 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. Approval is sent via Novelution with an email notification going to the PI and co-investigator(s); 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 via Novelution, providing an explanation of the determination. Any additional information or revisions that are required for approval of the amendment can be found in the 'Review Comments' panel. Once the review comments have been adequately addressed, approval is sent to the investigator via Novelution with an email notification going to the PI and co-investigator(s); the change may then be implemented upon receipt of this notice.

### 3.3 Expedited review.

Protocol amendments may require expedited review by the IRB chair, or one or more experienced IRB members, as described in *7.3 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 is 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. The effective approval date for the amendment is the date on which reviewer(s) determined that all criteria for approval were satisfied.

### 3.4 Full board review.

The IRB reviews proposed amendments that are more than minor, or may increase the level of risk to more than minimal at a convened meeting. 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 must be submitted by the posted meeting submission deadline. The effective approval date for the amendment is the date of the

meeting (when approved as submitted), or the date on which the responsive materials were determined satisfactory (when approved with conditions).

### 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 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.

### 5.0 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, by submitting and Adverse Event or Protocol Deviation (as applicable) form. Adverse Events or Protocol Deviations may be added within the relevant panel by clicking the “Add Deviation” or “Add Adverse Event” button as applicable. 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:**

[FederalWide Assurance 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 IRB Procedures](#)  
[Categories of Research Eligible for Expedited Review](#)

**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