MCW Office of Research
Standard Operating Procedure

MODIFICATIONS TO AN APPROVED PROJECT

Unit: Human Research Protections Program (HRPP), Office of Research
Applies to: MCW/FH Faculty and Staff involved in human research

PURPOSE:
Investigators who wish to change or modify an ongoing IRB-approved project, must submit an amendment to the IRB and receive IRB approval before implementing any modification. Exceptions to this process are described in this procedure.

DEFINITIONS:

Key Personnel: Those study staff who contribute to the scientific development or execution of a project in a substantive and measurable way, whether or not they receive salaries or compensation, such that they might qualify for co-authorship on publications.

Modification: Any change to a project that is made after initial IRB review and approval. Modifications include, but are not limited to, subject population, recruitment, procedures; design, sites, changes to personnel, or reports to the IRB regarding premature completion of a project.

Minor Modification: A modification that does not pose increased risk to the subjects. Minor modifications may include and are not limited to the following: reduction in the risk/discomfort to the subject, changing a funding source, adding staff, or making editorial changes to a consent form.

Major Modification: Any modification that is not a minor modification and requires a thorough evaluation of the overall risk benefit ratio of the project.

SmartForm Updates: Changes that can be made to specific sections of an approved eBridge Study SmartForm that are not required to be submitted through the Amendment process.

EXCEPTIONS
1. A modification that is necessary to eliminate apparent immediate hazards to the research participant [21 CFR 56.108(a) (4); 45A, Part 46, Section 103(b) (4) (iii)]. In such a case, the modification must be promptly (no longer than 30 days) reported to the IRB via a reportable event, and the IRB will review the change to determine that it is consistent with ensuring the research participants’ continued welfare.
2. SmartForm Updates such as changes to non-key personnel, contact information, or study duration. These changes should be filed with the IRB in eBridge as described in this procedure prior to initiating the changes.
SUBMITTING AMENDMENTS

1. Amendments must be reviewed and approved prior to incorporating the change into the project. When an Investigator receives an amendment or a request for change to the approved project, they must submit the amendment promptly to secure final IRB approval within 90 days from notification of the change. In addition, Investigators and study teams should work to respond quickly to any requested modifications to meet this expectation. This timeframe ensures the changes can be implemented in a timely process to protect the rights, safety and welfare of their subjects and the continued conduct of the project in accordance with the protocol.

2. To submit an amendment in eBridge, login to eBridge, locate the approved project from My Home page, and click on “New Amendment”.

3. For projects which remain in “paper” (examples include: CIRB protocols in long-term follow-up or HUD applications), amendments must be submitted using the Amendment Application form located on the HRPP website.

4. Examples of changes that need review by the IRB include but are not limited to:
   - Change in PI
     - This change requires the new PI to complete and sign the Agreement of Investigator Responsibilities form and upload this document into the Study Workspace.
   - Changes in key personnel
   - Increase or decrease of enrollment numbers
   - Change in recruitment methods
   - Changes in the consent form
   - Changes in an Investigator Brochure or device information
   - Change in procedures or randomization
   - Adding or dropping an arm of the project
   - Changes in questionnaires, surveys, interview scripts, advertising
   - Changes in funding
   - Changes in the title of the project
   - Addition of new study sites or locations which will be under the direction of the MCW/FH Principal Investigator
     -Investigators must include the IRB approval documents from the outside institution or contact the HRPP office to discuss the option of coordinated reviews.

5. Investigators must describe the changes proposed to the approved project in the eBridge AME SmartForm. The Investigator should include in the description where the changes are cited in the eBridge PRO SmartForm, how the consent form (if applicable), or revisions to other project related documents including but not limited to protocol summaries, data collection forms, surveys, or questionnaires. In addition, Investigators must provide the rationale for the changes to the project.

Other Federal Agencies Requirements:

1. For projects that receive funding from or based upon the nature of the study, may be subject to additional federal agency-specific requirements. The following must be applied and considered during the review process:
   - Department of Defense: All substantive amendments to approved research must undergo scientific review prior to IRB review.
     - The USAMRMC ORP HRPO defines a substantive modification as a change in Principal Investigator, change or addition of an institution, elimination or alteration of the consent process, change to the study
population that has regulatory implications (e.g. adding children, adding active duty population, etc.), significant change in study design (i.e. would prompt additional scientific review), or a change that could potentially increase risks to subjects.

- Documentation of this scientific review must be included with the amendment documents or indication from the funding agency if this was not required.

**Reviews Prior to IRB Review:**

1. Some amendments may require various administrative or ancillary committees prior to being reviewed by the IRB. Investigators should be aware of these processes when planning to submit an amendment to the IRB. The following are examples of ancillary committee which may need to review an amendment prior to IRB review:
   - Clinical and Translational Science Institute (CTSI/TRU)
   - Safety Committee (examples: IBC, Radiation Safety, Environmental Health)
   - MRI Safety Committee
   - Emergency Medicine Resource Review Committee
   - Office of Clinical Research & Innovative Care Compliance (OCRICC)

To find out more information regarding these committee’s review requirements, please click on the name to be directed to the relevant information or webpage if available.

**IRB Review**

1. When an amendment is received via eBridge by the IRB, the HRPP office will review the amendment and attached documents for completeness, and determine the type of IRB review the project activities would qualify for based upon the risks and proposed changes involved. The IRB reviews amendments under the following categories:
   - Expedited Review
   - Full Committee Review

   In order for the IRB to approve a project, basic criteria as described in the federal regulations must be met. The determination that all criteria are met will be based upon information provided in the submission and any attached documents.

2. The IRB will notify investigators of its decision to approve or disapprove the proposed changes to the project, or of modifications required to secure IRB approval of the changes. If the IRB decides to disapprove a modification, it will include in its written notification a statement of the reasons for its decision.

3. When the amendment is a result of significant new findings that might impact a subject’s willingness to continue participation, the IRB will require that this information be provided to subjects.

4. See IRB SOP: Requirements for Reporting to the IRB for additional information when new findings result in premature closure of a study, or are related to an unanticipated problem involving risks to subjects or others.

5. Amendments are assigned to the IRB Committee which conducted the initial review and approval of the protocol.

6. PIs and study staff are notified of the disposition of a protocol within approximately 3-5 days following an IRB Committee meeting.
7. If the amendment meets criteria for expedited review, PIs and study staff are notified of the disposition of an amendment within two weeks to one month from the date of submission.

8. By accessing the project in eBridge, the PI and study personnel will be able to see which Committee will review the modification, the name and contact information for the IRB Coordinator II responsible for the Committee, the meeting date at which the protocol will be reviewed, and the results of the review. The IRB Coordinator II should be contacted for questions related to the amendment or its review. Please remember to reference the submission number (AME#) assigned to the project in eBridge when requesting assistance.

SMARTFORM UPDATES TO APPROVED PROJECTS

1. SmartForm Updates encompass changes that may be made to the eBridge Study SmartForm without IRB review or changes which must be reviewed and acknowledge by IRB Staff prior to incorporating the change into the project.

   a. Changes which do not require review:
      • Changes to phone/pager for after-hours contact
      • Changes to Individuals who can edit the SmartForm
      • Changes to Individuals who will receive emails from eBridge

   b. Changes which require IRB Staff review:
      • Changes to Study Coordinator
      • Changes to non-key personnel
      • Changes to the estimated duration of project

   These activities are only available when the Study/Project is in the “Approved” state and when there are no amendments currently open with a project.

2. When an Investigator receives a request for an administrative change to an approved project that falls within the scope of the following activities, the change may be submitted via eBridge using the “Making SmartForm Update” or “Requesting SmartForm Update for IRB Staff Review” function.

   a. Making SmartForm Updates Without IRB Review
      1. This activity may be used to make the following changes in the eBridge Study SmartForm:
         • Phone/Pager for after-hours contact
         • Individuals who can edit the SmartForm
         • Individuals who will receive emails
      2. The Investigator or Study Coordinator will click on the “Make SmartForm Update” button to make any of the changes listed above.
      3. After making the changes, the Investigator or Study Coordinator must click “OK”. The updates will immediately be reflected in the eBridge Study SmartForm.

   b. Requesting SmartForm Updates for IRB Staff Review
      1. This activity may be used to make the following changes in the eBridge Study SmartForm:
         • Study Coordinator
         • Other non-key personnel
         • Estimated duration of project - No more than two extensions of project end date may be submitted using this activity throughout the life of the
Further changes to project end date must be made using the Amendment procedure.

2. The Investigator or Study Coordinator will click on the "Request SmartForm Update for IRB Staff Review" button to make any of the changes listed above. Justification must be provided for the requested changes.

3. After making the changes, the Investigator or Study Coordinator must click "OK" to forward the Request to IRB staff for review.

4. IRB staff will determine if the requested change(s) are within the defined scope of this activity.

5. If the Request is found to be acceptable by IRB staff, the Investigator and study staff will be notified of the determination via eBridge. The requested changes will automatically be made in eBridge.

6. If the Request is found to not be acceptable by IRB staff, the Investigator and study staff will be notified of the determination and reason for non-acceptance via eBridge. The email will provide questions or comments that the study team will need to address in order to pursue the requested changes.

REFERENCES:
N/A

SUPPORTING DOCUMENTS:
IRB Form: Agreement of Investigator Responsibilities Form
Amendment Application form

Effective Date: 02/07/2016
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