MCW IRB Committee Procedures

AMENDMENTS

Unit: Human Research Protections Program (HRPP), Office of Research

Applies to: Institutional Review Board Committees

PURPOSE:
This procedure outlines the steps taken when an amendment will be reviewed by the MCW IRB either by expedited review or convened Committee and expectations of the IRB members assigned as primary and/or secondary reviewers.

DEFINITIONS:
N/A

PROCEDURE:
REVIEW OF AMENDMENT

1. At the time of review, the IRB Committee considers the amendment as a description of the changes to the approved project to be reviewed in accordance with regulatory and institutional requirement.
    a. If the proposed changes are to change the Principal Investigator, the IRB Committee will review and examines the new Principal Investigator (PI) and project staff as components of the research to ensure the expertise and training to complete the research is appropriate.
2. The standards for the review of an amendment submission and/or consent form are outlined in the *IRB Member Form: Amendment Reviewer Checklist* which contains the federal regulations criteria for approval (45 CFR 46.111 or 21 CFR 56.111). These forms are available to members via the HRPP website, and during the meeting.
3. The IRB Committee must determine the following criteria are still met for approval of the changes.
    a. Risk to subjects are minimized by using procedures which are consistent with sound research design, and which do not unnecessarily expose subjects to risk and whenever appropriate by using procedures already being performed on the subject for diagnostic or treatment purposes
    b. Risks are reasonable in relation to anticipated benefits, if any, to subjects, and the importance of knowledge that may be expected to result.
    c. Selection of subjects is equitable
    d. Informed consent is sought from each subject or the subject's legally authorized representative. See: *IRB Member SOP: Informed Consent for Human Subject Research*
    e. Informed consent is appropriately documented or if approved by the IRB waived. See: *IRB Member SOP: Informed Consent for Human Subject Research*
    f. When appropriate, data will be monitored to ensure the safety of subjects
    g. Privacy and confidentiality protections are in place where appropriate. See: *IRB Member SOP: Privacy and Confidentiality*

4. Additional criteria for the review of research which may involve minors, incarcerated individuals, pregnant women and fetuses or individuals who may be decisional impaired are applied as set forth in the following procedures:
    a. *IRB Member SOP: Research Involving Prisoners*
    b. *IRB Member SOP: Research Involving Pregnant Women and Fetuses*
    c. *IRB Member SOP: Research Involving Children*
    d. *IRB Member SOP: Research with Subjects Likely to Manifest or Develop Decreased Decisional Ability*
5. 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. See *IRB SOP: Requirements for Reporting to the IRB* for additional information when new findings result in premature closure of a project, or are related to an unanticipated problem involving risks to subjects or others.

The specific criteria are made available to all members via the HRPP website and during the meeting.

Guidelines for Determining Type of Review for Amendment
Minor modifications which may qualify for expedited review:

1. Change in PI
2. Change in project title
3. Change in funding source
4. Reduction in sample siz
5. Deletion of items from questionnaires
6. Addition of project sites
7. Minor changes to the ICF (change in phone number, definition of terms, clarification of procedures)
8. Addition of non-sensitive items to questionnaires
9. New questionnaires, procedures that do not impose excessive new time demands or risks to subjects
10. Elimination of pre or post procedures evaluations if the elimination does not comprise the ability of the PI to accurately and safely determine eligibility or to monitor adverse effects
11. Changes in statistical analysis that do not affect sample size and number of treatment groups

Major modifications which may require convened Committee review:

1. Addition of a new treatment, procedure, medication that may increase risk
2. Adding highly sensitive question
3. Increase in sample size >20% unless:
    a. Project previously was determined to be no greater than minimal risk OR
    b. Project is sponsored by one of the NCI Cooperative Groups, the increase is less than 20 subjects AND the increase is <20% of the total multi-site enrollment goal
4. Addition of new project population
5. New risks or new information regarding risks

Other Federal Agencies Requirements:

1. For projects that receive funding from or based upon the nature of the project, may be subject to additional federal agency-specific requirements. The following must be applied and considered during the review process:

a. **Department of Defense:** All substantive amendments to approved research must undergo scientific review prior to IRB review.
    i. MCW HRPP 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 project population that has regulatory implications (e.g. adding children, adding active duty population, etc.), significant change in project design (i.e. would prompt additional scientific review), or a change that could potentially increase risks to subjects.
    ii. Documentation of this scientific review should be included with the amendment documents or indication from the funding agency if this was not required.

Expedited Review of Modifications

1. The IRB Coordinator II (C2) will identify if an amendment submission may qualify for expedited review by reviewing the original submission, the CPR, the content of the amendment, and the guidelines listed above. Either the IRB Chairperson or a designated IRB reviewer may be consulted.
2. The IRB C2 will upload the *IRB Coordinator II Checklist for Amendments* with their notes.
3. The IRB C2 will assign the amendment to the IRB Chairperson or designated reviewer to complete the review.
4. The IRB Chair or designated reviewer will review the *IRB Coordinator II Checklist for Amendments* and the amendment submission along with any proposed changes to the eBridge initial submission.
5. The IRB Chair or designated reviewer will ensure the criteria for approval as outlined in this procedure is maintained with respect to the proposed changes.
6. The IRB Chair or designated reviewer will complete the Expedited Reviewer Section of the *IRB Coordinator II Checklist for Amendments* indicate their decision via eBridge:
    a. to approve the changes, or
    b. require modifications to the proposed changes, or
    c. forward the proposed changes for review by the convened Committee

Convened Meetings and the Primary Reviewer System

1. When the IRB Committee reviews an amendment submission at a convened meeting, HRPP staff provides all members with sufficient information to evaluate whether the proposed changes maintains the criteria for approval. All IRB members have access to the same information.
2. The IRB Committees use a “primary reviewer” system to promote a thorough review of the amendment submission at a convened meeting.
3. With this system, the IRB C2 assigns the amendment submission to one or two IRB member(s) who are responsible for leading the discussion when the Committee reviews the submission. The reviewers are assigned in accordance with *Staff: Assigning Primary Reviewers and the Use of Consultants.* The *IRB Member Form: Amendment Reviewer Checklist* are available via the HRPP website under Committee Resources.
4. The Primary Reviewer performs an in-depth review of all the information of the amendment submission for which he/she is assigned according to the standards outlined in the *IRB Member Form: Amendment Reviewer Checklist* as appropriate.
5. All other IRB Committee members are expected to review key documentation from the information submitted to the IRB Committee in the amendment submission to the extent necessary to be prepared to participate in the discussion of the regulatory criteria for approving research. For more information reference*, IRB Member SOP: Conduct and Expectation of IRB Members*

a. For review of an amendment submission “key documentation” includes the following:
    i. SmartForm application
    ii. Consent Form (if applicable)
    iii. Recruitment materials (if provided)

6. If the assigned Primary Reviewer, the IRB Chair or HRPP Director determines that additional expertise is needed for the proposed research, an appropriate consultant will be invited to assist in the review of the research in accordance with *Staff: Assigning Primary Reviewers and the Use of Consultants.*
7. Following the presentation, the Primary Reviewer makes a motion for the IRB Committee’s vote as outlined in *IRB Member SOP: IRB Actions* and opens the floor for discussion among the members. At the end of the discussion the IRB Chair will call for a vote.

REFERENCES:
45 CFR 46.111
21 CFR 56.111

SUPPORTING DOCUMENTS:
IRB Member SOP: Informed Consent for Human Subject Research
IRB Member SOP: Privacy and Confidentiality
IRB Member SOP: Research Involving Prisoners
IRB Member SOP: Research Involving Pregnant Women and Fetuses
IRB Member SOP: Research Involving Children
IRB Member SOP: Research with Subjects Likely to Manifest or Develop Decreased Decisional Ability
IRB Member SOP: Conduct and Expectation of IRB Members
IRB Member SOP: IRB Actions
Staff: Assigning Primary Reviewers and Use of Consultants.
IRB Member Form: Amendment Reviewer Checklist
IRB SOP: Requirements for Reporting to the IRB
IRB Coordinator II Checklist for Amendments

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