MCW Office of Research
Standard Operating Procedure

AMENDMENTS

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

Applies to: 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. This includes changes to projects determined to be exempt but which undergo a limited IRB review. These changes must be submitted to and approved by the IRB prior to implementation. Exceptions to this process are described in this procedure.

DEFINITIONS:

Key Personnel: Those project 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.

Limited IRB Review: This review applies only to specific exempt determinations made by the IRB Committee and focuses on evaluating the provisions to protect the privacy of subjects and confidentiality of data are appropriate. Limited IRB review is required for research whose activities fall under the following categories: category 2(iii), and category 3(iii).

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 Principal Investigator, 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.

Design Modification: Any modification that 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 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 subjects' continued welfare.
2. SmartForm updates such as changes to non-key personnel, contact information, or project durationshould 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 proposed change(s) 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 project 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 that the continued conduct of the project is carried out in accordance with the protocol.
    a. Changes identified as part of a deferred funding review must be submitted within 30 days of the modifications being requested.
        i. Research teams should open an amendment to address the changes identified as part of the deferred funding review.
2. Examples of changes that need review by the IRB include but are not limited to:
    a. Change in PI
        i. This change requires the new PI to complete and sign the *Agreement of Investigator Responsibilities form* and upload this document into the Project Workspace.
    b. Increase or decrease of enrollment numbers
    c. Adding or removing a subject population (such as minors)
    d. Change in recruitment methods
    e. Change in the consent form
    f. Change to an Investigator Brochure or device information
    g. Change in procedures
    h. Adding or dropping an arm of the project
    i. Change to questionnaires, surveys, interview scripts
    j. Change in funding source (new or updated)
    k. Change in the title of the project
    l. Addition of new project sites or locations which will be under the direction of the Principal Investigator. For more information see *IRB SOP: Reliance Agreements for Multi-Site Projects.*
    m. Change to the approved NIH Data Management and Sharing Plan
    n. Change to a Significant Financial Interest and/or changes to a MCW Financial Conflict of Interest management plan

3. 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, any change to 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 a federal agency ormay be subject to additional federal agencyspecific 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. The USAMRMC 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 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 must be included with the amendment documents or indication from the funding agency if this was not required.

Reviews Prior to IRB Review:

Some amendments may require review by various Institutional, 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:

1. Childrens Wisconsin HRPP Local Context Review
2. Clinical and Translational Science Institute (CTSI/TRU)
3. Safety Committee (examples: Radiation Safety)
4. Emergency Medicine Resource Review Committee

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 qualify for based upon the risks and proposed changes involved. The IRB reviews amendments under the following categories:
    a. FLEX Review
    b. Expedited Review
    c. Convened Committee Review

2. The IRB will notify investigators of its decision to approve or disapprove the proposed changes to the project as well as any modifications required to secure IRB approval. If the IRB decides to disapprove a modification, it will include in its written notification a statement of the reasons for its decision.
3. If the amendment meets criteria for convened committee review, the PI and project staff are notified of the disposition of the amendment within 5 business days following an IRB Committee meeting.
4. If the amendment meets criteria for expedited review, the PI and project staff are notified of the disposition of the amendment within 5 business days following the IRB reviewer's determination.
5. If the amendment and overall project continues to meets criteria for FLEX review, the PI and project staff are notified of the disposition of the amendment within 5 business days following the HRPP Office's determination.
6. By accessing the project in eBridge, the PI and project personnel will be able to see which Committee will review the modification, the name and contact information for the IRB Coordinator II (C2) responsible for the Committee, and the meeting date at

which the protocol will be reviewed, if applicable. The IRB C2 should be contacted for questions related to the amendment.

SMARTFORM UPDATES TO PROJECTS

1. SmartForm updates encompass changes that may be made to the eBridge 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:
    i. Changes to phone/pager for after-hours contact
    ii. Changes to Individuals who can edit the SmartForm
    iii. Changes to Individuals who will receive emails from eBridge

    b. Changes which require IRB Staff review:
    i. Changes to Coordinator
    ii. Changes to non-key personnel
    iii. Changes to the estimated duration of 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 "Update My Project" function.

Making SmartForm Updates Without IRB Review

1. This activity may be used to make the following changes in the eBridge SmartForm:
    a. Phone/Pager for after-hours contact
    b. Individuals who can edit the SmartForm
    c. Individuals who will receive emails

2. The Investigator or Coordinator will click on the "Update My Project" button to make any of the changes listed above.

3. After making the changes, the Investigator or Coordinator must click "OK." The updates will immediately be reflected in the eBridge SmartForm.

Requesting SmartForm Updates for IRB Staff Review

1. This activity may be used to make the following changes in the eBridge SmartForm:
    a. Coordinator
    b. Other non-key personnel
    c. Estimated duration of project - *No more than two extensions of project end date may be submitted using this activity throughout the life of the project. Further changes to project end date must be made using the Amendment procedure.*
2. The Investigator or Coordinator will click on the "Update My Project" button to make any of the changes listed above.
3. After making the changes, the Investigator or 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 project staff will be notified of the determination via eBridge.

6. If the request is found to not be acceptable by IRB staff, the Investigator and project staff will be notified of the determination and reason for the determination via eBridge.

REFERENCES:
21 CFR 56.108(a) (4); 45A, Part 46, Section 103(b) (4) (iii)

SUPPORTING DOCUMENTS:
IRB Form: Agreement of Investigator Responsibilities Form
IRB SOP: Reliance Agreements for Multi-Site Projects

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