# Revisions and Amendments to Approved Research Studies

Investigators may not make any material changes in the research activity, except when necessary to eliminate apparent immediate hazards to the subject. Reports of significant information received by the investigator or IRB during the course of the approval period may constitute a change in the research and require modification of the research. Investigators should promptly report to the IRB any changes in research activities. Some revisions to research activities are eligible for expedited review; other changes may require full board review.

**Definitions:**

Minor revisions: Minor revisions are ones that would not materially affect an assessment of the risks and benefits of the study and do not substantially change the specific aims or design of the study.

Major revisions: Major revisions are ones that materially affect an assessment of the risks and benefits of the study OR substantially change the specific aims or design of the study.

## Minor revisions to approved research studies

Minor revisions proposed for previously approved research may be submitted to the Woman's Hospital Research Center (WHRC). Minor revisions are documented by the WHRC and do not require IRB review (with the exception of an addition of a study site). If the WHRC determines that the proposed revision does not qualify as minor or requires further review, the submission will be forwarded to the IRB Chair or to the full board for review.

Any proposed revisions to a study initially approved as exempt or expedited must be submitted prior to the implementation of the changes. Minor revisions will be documented by the WHRC. In certain situations, the IRB Chair may need to determine if the study continues to qualify for exempt or expedited review after the incorporation of the proposed changes. If the study no longer meets the exemption or expedited criteria after incorporating the proposed revisions, the study will be referred for full board review.

## Examples of minor revisions:

Examples of minor revisions include:

1. The addition of research activities that would be considered exempt or expedited if considered independent from the main research protocol;

2. An increase or decrease in proposed human subject enrollment;

3. Narrowing the range of inclusion criteria;

4. Broadening the range of exclusion criteria;

5. Alterations in dosage form (example, tablet to capsule or oral liquid) of an administered drug, provided the dose and route of administration remain constant;

6. Decreasing the number or volume of biological sample collections, provided that such a change does not affect the collection of information related to safety evaluations;

7. An increase in the length of confinement or number of study visits for the purpose of increased safety monitoring;

8. A decrease in the length of confinement or number of study visits, provided that such a decrease does not affect the collection of information related to safety evaluations;

9. Minor alterations in human subject research payment or liberalization of the payment schedule with proper justification;

10. Changes to improve the clarity of statements or to correct typographical errors, provided that such a change does not alter the content or intent of the statement;

11. The addition or deletion of qualified principal investigator(s), co-investigator(s), or study personnel, (which requires, for non-exempt studies, the submission of a curriculum vitae, investigator agreement, CITI training certificate, and a conflict of interest disclosure);

12. The addition of study sites or the deletion of study sites. (Other requirements may apply, such as Research and Development Committee review and submissions through IRB Exchange to capture local considerations.) Addition of a study site should be conducted via expedited review with consideration from the R&D review.

13. Minor changes to recruitment procedures or recruitment materials, or submission of new recruitment materials/advertisements, to be used in accordance with the recruitment methods outlined in the approved protocol;

14. Changes in payment to subjects that are not significant to affect the risk/benefit ratio;

15). Translations of materials previous approved by the IRB

## Major revisions for full board review

When a proposed revision to a research study does not meet the definition of a minor revision, then the full board must review and approve the changes at a convened meeting before revisions can be implemented.

The IRB will review the proposed revision to determine that:

- Risks to subjects continue to be minimized and reasonable in relation to anticipated benefits;
- Selection of subjects continues to be equitable;
- Informed consent is sought or waived in accordance with 45 CFR 46.116 as well as 21 CFR 50.25 for FDA-regulated research.
- Informed consent will be documented or documentation waived in accordance with 45 CFR 46.117 and 21 CFR 50.27 for FDA-regulated research.
- The research plan makes adequate provision for monitoring the data collected to ensure the safety of subjects, when appropriate;
    - There are adequate provisions to protect the privacy of subjects and to maintain the confidentiality of data, when appropriate; and
    - Appropriate safeguards for vulnerable subjects are provided.
    - If multi-site research, the study management of information relevant to protection of subjects is adequate.

## Examples of major revisions

Examples of major modifications include:

1. Broadening the range of inclusion criteria;

2. Narrowing the range of exclusion criteria;

3. Alterations in the dosage or route of administration of an administered drug;

4. Extending substantially the duration of exposure to the test material or intervention;

5. The deletion of laboratory tests, monitoring procedures, or study visits directed at the collection of information for safety evaluations;

6. The addition of serious unanticipated adverse events or other significant risks to the informed consent form;

7. New or revised financial conflict of interest management plans **OR**

8. Changes, in which the opinion of the IRB Chair do not meet the criteria or intent of a minor revision.

## Notification of IRB decision

A letter will be sent to the investigator documenting the IRB review decision. If applicable, revised informed consent(s) and Authorization to Release Health Information form(s) will be stamped with the IRB approval stamp and the investigator will be instructed to use the new, stamped document(s) for subject enrollment and that no other documents(s) will be valid.

## Immediate implementation of changes for safety of subjects

If the investigator feels patient safety will be compromised by not implementing a revision immediately, the IRB Chair has the authority to allow immediate implementation of the revision. In the event that the IRB Chair is unavailable, the IRB Vice-Chair may be consulted to allow the implementation. The investigator may contact the IRB Chair via e-mail to request implementation of the revision. If the IRB Chair agrees that the changes are necessary, the investigator may implement the change immediately and will also receive a letter in writing from the IRB Chair indicating the approval of the changes. If the IRB Chair allows changes to a research study in order to eliminate apparent immediate hazards to participants, the full board will review the changes at the next convened meeting. The convened IRB will review the changes to determine if the changes were necessary to ensure participants' continued welfare. The investigator will be notified of the outcome of this full board review in writing.

If the investigator feels that patient safety will be compromised by not implementing a revision immediately and the IRB Chair cannot be reached for implementation, the investigator should implement the revision and notify the IRB Chair at the earliest opportunity.

## Submitting a study for revision

Any major amendment or revision to a research study must be submitted using a continuing review / revision application and approved by the IRB prior to implementation. Investigators must submit the exact text of the change. When there are numerous proposed changes, a summary of the changes should be included. A tracked copy of the amended documents should be submitted with a clean, revised copy.

Modifications to the informed consent form(s) must take into account both prospective subjects and previously enrolled subjects. If the modification directly affects or represents a new finding which may impact a previously enrolled subjects' willingness to participate, the subjects must be informed using an addendum to the initial consent form or by re-consenting the subject using the approved modified informed consent document.

Investigators must submit the following materials for all major amendments/revisions:

1. IRB Continuing Review / Revision application;
2. If informed consent forms and/or authorization forms are revised, a copy of the revised document with changes highlighted;
3. If informed consent forms and/or authorization forms are revised, a clean copy of the revised document with changes not highlighted; **AND**
4. If any other documents are revised, a copy of revised document with changes highlighted or a summary of the changes.

## IRB requested revisions and clarification

Revisions required by the IRB at a convened meeting to the protocol, informed consent form(s), or any other study materials will be verified by the IRB Chair, unless the IRB requires that the requested revisions are to be reviewed at the next convened meeting. Any requests for modifications or revisions directly relevant to criteria for approval or any substantive changes will require full board approval at a convened meeting.

A letter will be sent to the investigator documenting the IRB-requested revisions.
The investigator is responsible for completing the revisions and submitting them to the Woman's Hospital Research Center.

If the requested revisions are to be reviewed by the IRB Chair on behalf of the full board, the Woman's Hospital Research Center will forward them to the IRB Chair who will review the revisions for completion. If, after reviewing the submitted revisions, the IRB Chair determines that additional changes are necessary, these requested revisions will be communicated to the investigator.

Once the revisions have been verified as completed by the IRB Chair, a letter will be sent to the investigator documenting approval of the changes. If applicable, revised informed consent form(s) and/or Authorization to Release Health Information form(s) will be stamped with the new approval date and the investigators will be instructed to use the new, approved document(s) for consenting subjects.