TITLE: Institutional Review Board Review of Research
RR 403 Modifications to Approved Research

ORIGINATOR: Institutional Official

APPROVAL: Institutional Official

POLICY STATEMENT: Changes in approved research, during the period for which approval has already been given, may not be initiated without prior IRB review (full or expedited review, as appropriate) and approval, except where necessary to eliminate apparent immediate hazards to human participants.

GENERAL PROVISIONS: The federal regulations at 21 CFR 56 and 45 CFR 46 require IRB review and approval before an investigator implements any modification to a study. A modification includes a change in the following:

- Study design, study methods or procedures (including the removal of a procedure);
- Study title or sponsor;
- Recruitment procedures or strategies;
- IRB-approved informed consent process or consent form, authorization, questionnaires, recruitment materials (e.g., advertisements, contact letters/postcards, scripts) or other study-related documents;
- Investigators, including the addition or withdrawal of sub-investigators and co-investigators;
- Study sites or sub-sites, including the addition or removal of sites;
- Use or disclosure of Protected Health Information (PHI), including changing individuals or entities to whom PHI is disclosed and authorization forms; and
- IRB-approved data security measures or disclosures.

Federal regulations allow the PI to implement a change without IRB approval only when it is absolutely essential to protect the safety, rights, or welfare of one or more human subjects. The regulations require that the PI notify the IRB within five business days of implementing the change.

Federal guidelines allow IRBs to review modification requests using an expedited review procedure if specific criteria are met. If specific criteria are met, examples of minor modifications that the IRB may be able to review using an expedited review procedure include:

- Substitution of assessments with alternate assessment that present minimal risk;
- Increase or decrease of enrollment supported by a statistical justification;
- Narrowing the range of inclusion criteria;
Institutional Policy & Procedure

- Broadening the range of exclusion criteria;
- 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;
- Changes to improve clarity of statements or to correct typographical errors, provided that the change does not alter the content or intent of the statement;
- Change in a telephone number (e.g., investigator, IRB), as required by the region;
- Addition or deletion of qualified investigators;
- Addition of study sites;
- Revisions or modifications to the informed consent and/or authorization to provide clarification, revised lay language, or inclusion of missing elements; and
- Addition of recruitment notices provided there is no change in the risk/benefit determination.

If the IRB does not review the modification request by expedited review, the request must go to the convened IRB.

The Mercy Health Principal Investigator (PI) will not implement a change in any IRB-approved study or study-related document without obtaining prior IRB approval except if it is necessary to protect the safety, rights, or welfare of one or more research participants.

If the PI implements a change in the study without prior IRB approval because such modification was necessary to protect the safety, rights, or welfare of study participants, he/she must notify the IRB within five business days of implementing the modification. The report will include a description of the modification, a statement that the modification has already been implemented, and a justification of his/her decision to proceed with the modification without obtaining IRB approval.

The PI will submit a Study Modification form to the IRB when notifying the IRB of any planned study modifications. The Study Modification form is found within the electronic IRB Manager submission software.

The modification request should include the following information:

- Study title and Mercy Health PI

- Party initiating the modification (PI, sponsor or other)

- Description of the modification

- Purpose of the modification

- An explanation of the effects (e.g., increase or decrease of risks) of the modification on research participants in enough detail for the IRB to determine the risks relative to the benefits;

- A statement regarding whether any of the following revisions are necessary (including any proposed language or deletions):

  - Consent form with HIPAA Authorization incorporated; or
  - Privacy authorization form; and
  - Other study-related documents; and

- A statement whether the currently enrolled subjects or specific subset of subjects should be either re-consented or provided with a consent form addendum or letter explaining the nature of the change.
Institutional Policy & Procedure

The PI will notify the co-/sub-investigators, external collaborators, and sponsor, as applicable, of IRB decisions regarding study modification requests.

The PI can request an expedited review of a minor modification; however, the IRB will determine whether the requested modification can be reviewed by expedited review.

REFERENCE:
45 CFR 46 Subpart A: Protection of Human Subjects
21 CFR 56: Institutional Review Boards
(Chapter 7-1, “Revisions to an Approved Study” by Sherry Bye and Ann O’Hara)

ATTACHMENTS: 403-A Request for Modification
403-B Modification Approval Letter Full Board (with ICF changes)
403-C Modification Approval Letter Expedited
403-D Modification Submission-Request for Further Information Letter
403-E Modification Approval Letter Full Board (without ICF changes)

PROCEDURE: All Mercy Health Campuses

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<tr>
<th>Responsibility</th>
<th>Action</th>
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<tr>
<td>IRB Specialist</td>
<td>1. Print and provide IRB Chair with a copy of the fully submitted modification package for review.</td>
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<td>2. Complete steps within the IRB Manager system as package move through the review and approval process.</td>
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<td>3. Generate IRB approval letter once the review has been completed</td>
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<td>IRB Coordinator</td>
<td>1. Ensure each meeting agenda includes the reporting of all expedited modifications.</td>
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<td>IRB Chairperson</td>
<td>1. Review each submitted modification package and determine if the modification request is expeditable or needs to be reviewed by the fully convened committee.</td>
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<td>2. If the modification is expeditable, review the modification and determine if it may be approved or should be disapproved.</td>
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<td>3. Notify the IRB Specialist who will generate the appropriate letter based on the review.</td>
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<td>4. If the modification must be reviewed by the fully convened board, request IRB Specialist to add to the next meeting agenda.</td>
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CONCURRENT CONSENTS:
Institutional Official