Purpose

To provide a policy and procedure for the research community and the Princeton University Institutional Review Board (IRB) for prompt reporting and consideration of amendments to previously approved research.

Regulatory Background

The Department of Health and Human Services (DHHS) regulations 45 CFR 46.103(b) (4) (iii) require that the IRB review and approve proposed changes in a research activity, during the period for which IRB approval has already been given. Approval must be granted prior to implementation of such changes, except when necessary to eliminate apparent immediate hazards to the subjects (in such cases the IRB must be notified immediately).

Scope

This policy and procedure applies to all investigators, including students, conducting human research under the jurisdiction of the Princeton IRB. This policy and procedure applies to all IRB-approved human subject research.

Responsibilities

Principal Investigator: Responsible for the content of the proposed amendment.

IRB Staff: Make the preliminary determination about whether a proposed amendment is major or minor and route it to through the appropriate channels.

IRB Member(s): Make final determination as to whether amendment is major or minor and whether it is reviewed through the expedited or full Committee process.

Definitions

Amendment - Proposed change to a research activity, which was previously approved by the IRB. Amendments are defined as “minor” or “major,” which are subject to different review processes by the IRB.

Minor amendment - Changes to research that do not affect the risks and benefits of the study by substantially altering the following including, but not limited to: research aims or methodology, nature of subject participation, level of risk, proposed benefits, participant population, qualifications of the research team, or the facilities available to support the safe conduct of research. Minor does not mean trivial. Examples of minor amendments include:
- The addition or deletion of study personnel (not Principal Investigator)
- The addition of a study site that does not increase the risk of the study
- Deletion of a study site
- Minor alterations in human research participant payment
- Minor wording changes in the consent form(s), recruitment materials, or measures, which do not materially alter the research activities
- Minor changes in the length of participation
- Minor changes in number of study participants

Major amendment - Changes to research that materially affect the risks and benefits of the study by substantially altering the following including, but not limited to: research aims or methodology, nature of subject participation, level of risk, proposed benefits, participant population, qualifications of the research team, or the facilities available to support the safe conduct of research. Examples of major amendments include:

- Adding procedures that are not eligible for expedited review
- Addition to the consent form of a description of an unexpected event or serious risk
- Procedures involving increased risk or discomfort
- Changes that increase the risk to study participants or might adversely affect the willingness of current participants to remain in the study
- Major extensions of the duration of exposure to the test material or intervention

Policy

1. Minor amendments may undergo expedited review

2. Major amendments may undergo full committee review

   a. If researchers have questions about the significance of a requested amendment, they are encouraged to check with the IRB Staff. The ultimate determination of whether an amendment is considered minor or major rests with the IRB.

3. IRB office staff will determine whether the proposed changes may be reviewed through an expedited or full Committee review procedure.

   a. The reviewer(s) using the expedited procedure has the ultimate responsibility to determine that the proposed changes may be approved through the expedited review procedure and, if not, must refer the amendment for full Committee review.

   b. The reviewer(s) using the expedited procedure may approve, recommend modifications or recommend full Committee review. The reviewer cannot disapprove an
4. Amendments that rise to the level of creating a new project or substantially alter the specific aims or design of the study, or multiple amendments, may require the submission of a new application for IRB approval.

Procedure

1. Investigators must submit details of an amendment as requested in the Modification Request form or other revision(s) to the protocol and study documents to the IRB for consideration. Required documents may include, but are not necessarily limited to:
   a. Completed Modification Request form
   b. Revised Initial protocol application
   c. Revised or additional recruitment materials
   d. Revised consent/parental permission/assent documents (if applicable) presented separately or
   e. Any other relevant documents provided by the investigator that would be provided to subjects when such information might relate to or affect their willingness to continue to participate in the study

2. When the IRB reviews modifications to previously approved research, the IRB considers whether information about those modifications might relate to participants' willingness to continue to take part in the research and if so, whether to provide that information to participants.

References

45 CFR 46.110(a), (b): Expedited review procedures for certain kinds of research involving no more than minimal risk, and for minor changes in approved research.

45 CFR 46.116: General requirements for informed consent.

45 CFR 46.103  Assuring compliance with this policy -- research conducted or supported by any Federal Department or Agency.

Version History

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