Policy
Department: HUMAN RESEARCH PROTECTIONS PROGRAM
Policy Number: III.J
Section: IRB Review Procedures
Review Responsibility: HRPP Policy and Procedure Committee
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May 21, 2010; April 28, 2015; July 1, 2015

Subject: Amendments to Previously Approved Applications, Claims for Exemption, or Non-Human
Subject/Non-Research Determinations

Definitions:
1. Amendment: Any change to an IRB-approved study protocol regardless of the level of review it
receives initially.
2. Major Amendment: A proposed change in research related activities that materially affects an
assessment of the risks and benefits of the study or substantially changes the specific aims or
design of the study.
3. Minor Amendment: A proposed change in research related activities that does not materially affect
an assessment of the risks and benefits of the study and does not substantially change the
specific aims or design of the study.

Policy:
It is the policy of the Institutional Review Board (IRB) to review all requests for amendments to
previously approved research applications or claims for exemption to determine if a change in the
risk/benefit ratio of the study has occurred.

I. For previously approved applications or Claims for Exemption or Non-Human
Subject/Non-Research determinations that were approved within the last year, all planned changes in
the conduct of a study and/or changes to the informed consent document (ICD) must be
approved by the IRB prior to initiation.
   A. Investigators must submit the exact text of an amendment or other revision to
the protocol and any proposed changes to the consent document to the IRB. When there
are numerous changes to the research protocol, a summary of the changes should also
be submitted.
   B. Modifications to the informed consent document must take into account both
prospective research subjects and, if applicable, research subjects already enrolled in
the study. The latter may be addressed using an addendum to the initial ICD or, less
preferably, by re-consenting the subject using the modified ICD.
   C. The Investigator may make a modification to research activities to avoid an
immediate hazard to the participant but must report this to the IRB within 7 calendar days
(See HRPP Policy III.L).

II. Minor Amendments.
Minor changes proposed for previously approved research may be reviewed in an expedited
manner. Examples of minor amendments may include, but are not limited to, the following:
A. The addition of research activities that would be considered exempt or expedited if
considered independent from the main research protocol;
B. An increase or decrease in proposed human research subjects’ enrollment;
C. Narrowing the range of the inclusion criteria;
D. Broadening the range of the exclusion criteria;
E. Alterations in the dosage form (e.g., tablet to capsule or oral liquid) of an administered
drug, provided the dose and route of administration remain constant;
F. 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;
G. An increase in the length of confinement or number of study visits for the purposes of increased safety monitoring;
H. A decrease in the length of confinement or study visits, provided that such a decrease does not affect the collection of information related to safety evaluations;
I. Alterations in human research participant payment or liberalization of the payment schedule with proper justification;
J. Changes to improve clarity of statements or to correct typographical errors, provided that such a change does not alter the content or intent of the statement;
K. The addition or deletion of qualified Investigators;
L. The addition of study sites (which may require a Federalwide Assurance (FWA) and appropriate IRB approval) or the deletion of study sites;
M. Minor changes specifically requested by the Institutional Biosafety Committee (IBC); the Human Subjects Radiation Committee (HSRC); the Radioactive Drug Research Committee (RDRC); or other University Committees with jurisdiction over the research; or
N. Any added procedure that is minimal risk and fits the criteria for expedited review categories 1-7 (See HRPP Policy III.D).

III. Major Amendments.
When a proposed change in a research study is not minor, then the IRB Committee must review and approve changes at a convened meeting before changes can be implemented.
Examples of major modifications may include, but are not limited to, the following:
A. Broadening the range of inclusion criteria;
B. Narrowing the range of exclusion criteria;
C. Alterations in the dosage or route of administration of an administered drug;
D. Extending substantially the duration of exposure to the test material or intervention;
E. The deletion of laboratory tests, monitoring procedures, or study visits directed at the collection of information for safety evaluations;
F. The addition of serious unexpected adverse events or other significant risks to the Informed Consent Document; or
G. Changes, which, in the opinion of the IRB chairperson or his/her designee, do not meet the criteria or intent of a minor modification.

IV. Re-consent/Notification of Participants.
The IRB will render a determination of whether the changes to the research activities require a change in the ICDs and therefore warrant re-consenting of currently enrolled participants or notification of participants who have completed research interventions.

V. Exempt Research.
Any proposed or anticipated changes in an exempt study must be submitted to the IRB for approval prior to initiation of the change. The research proposal will then be evaluated for appropriate IRB review. For Claims for Exemption that were approved more than one year before the amendment was submitted, the Investigator must submit a new “Claim for Exemption” incorporating the proposed change.

VI. Non-Human Subject/Non-Research.
Any proposed or anticipated changes in a non-human subject/non-research determination must be submitted to the IRB for approval prior to initiation of the change. The research proposal will then be evaluated for appropriate IRB review. Proposed changes occurring after the first anniversary date of IRB approval will need to be submitted as a new “Request for Non-Human Subject/Non-Research Determination”.

References:
21 CFR 56.110(b)(2)
45 CFR 46.110(b)(2)