



## UNIVERSITY OF CALIFORNIA, SAN DIEGO HUMAN RESEARCH PROTECTIONS PROGRAM

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### Submitting an Amendment/Modification to an Approved Research Study

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#### **A. General Information**

All modifications/changes in a project must be received and approved by the Institutional Review Board (IRB) *before* they are initiated except where necessary to eliminate apparent immediate hazard to the subject. Requests for approval of modifications/changes may be submitted at any time by the Principal Investigator (PI) during the active, approved period of a study.

*If the submission does not provide sufficient information for appropriate review, it will be considered incomplete. In addition, should a study document require revision because of the proposed modifications/changes, two copies of the revised study document must be submitted: one copy that clearly and specifically highlights all changes made to the document including additions and deletion by using the track changes function in Microsoft Word (or a similar function in other word processing software), and one clean copy of the document. Without submission of “track change” and clean documents, the submission would also be considered incomplete.*

**An incomplete submission may be returned to the PI without review or the PI may be contacted to provide additional information/documentation, which will likely delay review and possible approval of the modifications/changes.**

Please note that should correspondence be submitted to the IRB/HRPP for review that is not provided over the PI's signature, the correspondence may be returned to the PI without review, which will delay the review of the correspondence. In addition, regulators may invalidate an IRB's determination if the IRB is unable to demonstrate that the PI is the responsible submitting party. As other IRBs have experienced, when this occurs any data collected may not be used, and at times, suspension of the studies have been called for by the federal regulators who oversee IRB activities. Further, provision of correspondence over the PI's signature is one way to ensure that the PI, who is ultimately responsible for the study, is fully informed of all study activities. Although the PI may authorize his/her research study staff (such as the clinical research coordinator) to submit materials on his/her behalf, it should be done with the PI's acknowledgement. Please ensure that submissions to the IRB/HRPP are provided over the signature of the PI.

“Major” modification requests are reviewed through convened IRB review process. Major modifications may impact on the risk/benefit ratio in the study. Examples of modifications that are typically considered to be major in nature include escalation in the drug(s) dosage(s), the introduction of an additional drug(s); new risk information and/or changes in risk to subjects; changes in inclusion/exclusion criteria; significant changes in study design and the addition of a new invasive procedure.

Federal guidelines include that “An IRB may use the expedited review procedure to review... (2) minor changes in previously approved research during the period (of one year or less) for which approval is authorized.” [45 CFR 46.110(b)(2)]. The review will be carried out by the IRB Chair, or his/her designee(s) from members of the IRB. If the Chair or designee believes that the "minor" modification is too substantive to receive this type of review, the submission will be referred for convened IRB review. Minor modifications that *may* receive expedited review include minor changes in recruitment materials/procedures; correction of typographical and grammatical errors or editorial revisions that do not change the meaning of the study document; change in compensation for participation if not considered to be coercive; addition of new study site; and translations of materials previously reviewed and approved by the IRB.

Changes in study sites or investigators or additions must also be reported to the IRB and may receive expedited review. These requested changes involve sending a cover letter, revised application face page, and may involve revised Research Plans and consent documents. In the case of a change in the PI, the investigator who holds the approval should sign the cover letter, and a letter indicating acceptance of the role and responsibilities PI signed by the individual who will become the PI must also be provided. A revised application face sheet reflecting the change in PI that is signed and dated by the incoming PI and Department Chair must also be provided.

For protocols involving investigational drugs or devices, an amendment or protocol change intended to eliminate an apparent immediate risk or danger to participants may be implemented immediately provided the FDA is subsequently notified by protocol amendment and the reviewing IRB is notified in accordance with 21 CFR 56.104(c). If such an amendment or protocol change is done, a protocol deviation report must be submitted to the IRB within 5 business days.

The initial determination as to whether a modification/change is major or minor is the responsibility of the PI, who assesses the degree of modification/change in study procedures and risks. The PI's determination must be included in the cover letter submitted with the amendment request (see below). However, the acceptance of the determination rests with the IRB. The modification(s)/change(s) is/are reviewed by the IRB professional staff and a determination of whether convened IRB review is necessary is made.

**An amendment/modification is given approval only to the overall study expiration date that was received at the most recent initial or renewal approval.**

## **B. Specific Submission Requirements**

### **1. Cover Letter**

This letter must contain the project number, title, name of principal investigator, and **should specifically state that an amendment to the currently approved study is being requested**. The letter should clearly detail *what* the modification is, *why* it is being requested, and any potential *changes to risks to subjects, risk/benefit ratio, risk management procedures, etc.* If *revisions* have been made to *study documents*, the cover letter must provide an *outline of those revisions* as well as *why* those revisions are being made. As noted above, the cover letter must be provided over the PI's signature.

It is strongly suggested that the Amendment Request Cover Letter form be used. The form and information about it, can be found [here](#).

## **2. Updated Application Facesheets, if applicable**

If the amendment/modification requires revision to the application Facesheets, revised application Facesheets must be submitted. The revised Facesheets must be signed and dated by the PI. If a change in the study PI is being requested, revised application Facesheets reflecting the change in PI that is signed and dated by the incoming PI and Department Chair must be provided.

## **3. Revised Research Plan (UCSD IRB Protocol), if applicable**

Two copies of a revised Research Plan are required if revisions have been made to this document. **One copy** must clearly and specifically **highlight all the changes made to the document including additions and deletions by using the track changes function in Microsoft Word (or a similar function in other word processing software)**, and *one clean copy* of the document must be submitted. This is only required if there are revisions to any item of the Research Plan.

## **4. Revised Consent/Assent Form(s), if applicable**

Two copies of the revised document(s) must be submitted. **One copy** must clearly and specifically **highlight all the changes made to the document including additions and deletions by using the track changes function in Microsoft Word (or a similar function in other word processing software)**. Consent/assent forms are stamped by the HRPP once they have been approved; therefore, the second copy submitted should be a clean copy of the revised consent/assent **with a 2-inch by 2-inch “content free” space on the upper left-hand corner of the first page of the document and the lower right-hand corner on the remaining pages** for appropriate placement of the IRB stamp-of-approval.

## **5. Additional Information, if applicable**

Additional information should be submitted including updated Master Protocol, Investigator’s Brochure, package insert, recruitment materials, etc., if applicable. If any of the documents have been revised, two copies must be provided, one that highlights the changes and one clean copy, as noted above.

## **6. Addition of Minors**

The addition of minors to a protocol requires review a convened IRB. This modification also requires the addition of a parental consent, adolescent assent (for children age 13-17 years) and child assent (for children aged 7-12 years), as needed. The cover letter should also clearly describe specific risks, risk/benefit, and risk-management procedures, etc. in regards to the addition of this vulnerable population.

## **C. FURTHER INFORMATION**

For further information or clarification regarding modification of a research plan, please call the HRPP Office at (858) 246-4777. All completed materials should be uploaded to the existing project number on the HRPP website through [e-IRB services](#).

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