

Michigan State University Human Research Protection Program	
<i>Subject:</i> Revisions to an Approved Project	
<i>Section:</i> 8-6	<i>This policy and procedure supersedes those previously drafted.</i>
<i>Reviewed by:</i> IRB, URC, UGC, MSU Legal Counsel; <i>Revision reviewed by</i> HRPP Director, Sr. Asst. VP <i>Regulatory Affairs, VPRGS.</i>	<i>Approved by:</i> Vice President of Research and Graduate Studies, 4-21-2005. Revision approved by the Vice President of Research and Graduate Studies on 4-5-2006.
<i>Related Sections:</i> 6, 8, 8-2, 8-3, 9-5	

Policy

Any proposed change or revision to an approved project that affects human subjects (with certain limited exceptions discussed below), must be reviewed and approved by the Institutional Review Board prior to implementation of the change. This includes any change made at individual performance sites for Community Research Institutional Review Board (CRIRB) projects. To apply for approval of a revision, the investigator must complete and submit a revision application and attach any new and/or revised documents.

Revision approvals do not change the approval or expiration date of the project. The approval simply approves the modification or revision to the project and allows investigators to begin using the modified or new documents, procedures, etc. The responsible project investigators must receive a letter from the IRB approving the proposed revisions before the changes are implemented. For CRIRB projects, the CRIRB chair will pass the approved changes on to the IRB chairs at the performance sites.

Immediate Change to Eliminate Hazard

When an immediate change in either a therapeutic or non-therapeutic research protocol is necessary to eliminate a hazard to subjects, the proposed change need not be reviewed by the IRB prior to its implementation. In such situations, however, investigators must report the change in protocol **immediately** thereafter. See Section 9-5, "Unapproved Change in Protocol", of the HRP Manual for policies and procedures.

Definitions

risk - the probability of harm or injury (physical, psychological, social, or economic) occurring as a result of participation in a research study

minimal risk (minor risk) – “means that the probability and magnitude of harm or discomfort anticipated in the research are not greater in and of themselves than those ordinarily encountered in daily life or during the performance of routine physical or psychological examinations or tests” (45 CFR 46.102(i), 21 CFR 56.102(i))

more than minimal risk (not minor risk) - risks to subjects that exceed those ordinarily encountered in daily life or in the performance of routine physical or psychological examinations

Minor vs. Non-Minor Changes

45 CFR 46.110 (b), 21 CFR 56.110(b). An IRB may use the expedited review procedure to review either or both of the following:

- (1) some or all of the research appearing on the list and found by the reviewer(s) to involve no more than minimal risk
- (2) **minor changes in previously approved research during the period (of one year or less) for which approval is authorized.**

Minor Changes. A minor change is one that does not introduce new risks that exceed those ordinarily encountered by the subjects in daily life or in the performance of routine physical or psychological examinations. Minor changes may be reviewed using the Expedited procedure so long as the changes do not increase the level of risk and/or privacy protections for subjects. Examples may include but are not limited to minor changes in: funding, project title, study investigators, advertisement, recruitment, consent, instruments, subject incentive, target population or research design or analysis. If the change in protocol is relatively minor (e.g., change in investigator, change in a sequence protocol activities) it may not be necessary to have subjects sign new consent forms.

Non-Minor Changes. A change that is not minor introduces risks to subjects exceeding those ordinarily encountered in daily life or during the performance of routine physical or psychological examinations. Examples of changes that are not minor include the addition of an intervention not addressed in the original consent form, or a disclosure of a previously unidentified risk. In these instances, the investigator may be required to have all new subjects sign a revised consent form and all currently enrolled subjects who may be affected by the change sign an addendum to the consent form. A change that is not minor (increased risk) must be reviewed at the convened IRB Meeting.

If the project's review level is not already Full Board Review and the change requested is considered a non-minor change, the project's review level will be changed to Full Board review. See Section 8 "Types of IRB Review" of the HRP Manual for policies and procedures related to change in review level and/or category.

The IRB chair may be consulted to determine if the revision qualifies as non-minor and therefore needs to be sent to additional reviewers and be reviewed at the convened IRB Board Meeting. For projects in which it is not clear if the change is more than minor, the project may be sent to two physician IRB members (medical) or two IRB members (non-medical) who will alert the IRB office if the changes are more than minor. If they are more than minor, the revision will be brought to the IRB at its monthly meeting for review. If the reviewers determine that the changes are minor, the project will be

reviewed using the Expedited review procedure, and an approval letter may be issued once reviewer(s) approve the change. See Section 8-2, "Expedited Review Procedure", of the HRP Manual.

Materials Required for Submission

The investigator is required to complete the revision form that includes a description of the change and whether the change affects the risk or consent. The investigators are required to submit any new or modified documents with the revision application. Revision applications will not be processed if the new or modified document is missing.

The Responsible Project Investigator must sign revision forms. Students requesting revisions to their protocols must have the signature of the Responsible Project Investigator on the request.

Mechanism(s) for Submission

MSU IRB Revision applications may be submitted via mail or email. If submitted by email, Revision Forms must be sent from the Responsible Project Investigator's MSU e-mail account. If submitted by mail, Revision Forms must be signed by the Responsible Project Investigator.

Submission Processing

The IRB staff checks for completeness (e.g., all questions answered, any new or modified documents attached). Incomplete applications will be returned.

How Review is Conducted

See the following HRP Manual sections for review procedures: Section 8-2, "Expedited Review Procedure", or Section 8-3, "Full Board Review".

IRB Member Considerations

The IRB member(s) is required to review and approve protocols using the criteria at federal regulations 45 CFR 46 and, for FDA projects, 21 CFR 56. See Section 6, "IRB Evaluation Criteria" of the HRP Manual for approval criteria and other considerations.

When reviewing modifications to an approved project (revisions), the criteria for IRB approval must be met to approve the requested revision. The IRB member(s) should determine how the change may affect the IRB approval criteria (e.g., change in recruitment may affect the selection of subjects criteria for approval). The IRB member(s) should utilize Section 6, "IRB Evaluation Criteria" of the HRP Manual to review the proposed change (e.g., informed consent section for changes to the informed consent process) as needed.

The IRB member(s) should, in particular, consider the following:

- The type of change (modification vs. addition)
- Whether there is a change in level of risk

- Whether the change alters the project's review level and/or category (See Section 8, "Types of IRB Review" for policies and procedures related to change in review level and/or category)
- Overall effect of change on research project
- Whether change requires a consent form modification
- Whether the change involves:
 - vulnerable populations
 - addition of sensitive questions
 - privacy and/or confidentiality considerations
- Effect of the change on participants' willingness to continue the study
- Whether information should be provided to past or currently enrolled participants:
 - Use of an information sheet vs. re-consent
 - If provided, the adequacy of information sheet or re-consent document