

**Policy Number: 11**

**Title: IRB Review of Modifications to Previously Approved Research**

**Date of Last Revision: July 5, 2007**

## **I. Introduction**

All modifications to currently approved research must be approved by the IRB prior to implementation, except when necessary to eliminate apparent immediate hazards to the human subjects. Modifications or changes to the protocol are commonly referred to as addenda or amendments.

## **II. Investigator Responsibilities**

Investigators must provide the IRB with complete descriptions of the modifications, including the rationale(s) for the modifications and the anticipated impact upon current and future subjects, as well as revised versions of those study materials affected by the modifications (e.g., IRB application, study protocol, informed consent documents). Investigators should consult the *Addendum Checklist* available from the OPRS website when assembling submissions.

## **III. Level of Review**

Minor changes that do not increase the risk to subjects and which constitute a minor change to the previously approved research may be reviewed by expedited review procedures. Additionally, modifications to protocols that have previously been reviewed under the expedited review procedures may also be reviewed under the expedited review procedures.

Modifications that constitute more than a minor change or which impact the risks and benefits to subjects will require full Committee review.

Please refer to [OPRS/IRB Policy 9: IRB Review Process—Full Committee Review](#) and [OPRS/IRB Policy 8: IRB Review Process—Expedited Review](#) for details.

## **IV. Criteria for Approval**

The criteria for approval of modifications to previously approved research are the same as those for initial review. The IRB must make the determinations required under 45 CFR 46.111 (or 21

CFR 56.111 for research subject to FDA regulations) regarding, among other things, risks, potential benefits, informed consent and safeguards for human subjects.

## **V. IRB Review Process**

Upon receipt of an addendum application, IRB staff and/or the Chair/Vice Chair will pre-review the submission to determine the appropriate level of IRB review required. Minor changes in previously approved research will be forwarded to the Chair or his/her designee for consideration under the expedited review procedures. If the Chair or his/her designee determines that the modifications do not qualify for review under the expedited review procedures, the modifications will be forwarded to the full Board for review. Modifications which may increase the risk to human subjects or which represent more than a minor change will be forwarded to the full Committee for review.

The convened IRB or the IRB Chair/designee using expedited review procedures will determine whether the proposed changes require modifications to the consent form and re-consenting of subjects. The convened IRB or the IRB Chair/designee using expedited review procedures will ensure that information relating to protocol changes will be provided to subjects when such information may relate to the subject's willingness to continue to take part in the research.

When the IRB approves a modification to a protocol, the approval of the modification does not result in a change to the approval period for the protocol. For example, if the new, renewal, or continuing approval is issued on January 1, 2006, the protocol will have an expiration date of December 31, 2006. If an addendum is approved during the approval period time, the protocol will still have an expiration date of December 31, 2006.

## **VI. Materials to be Reviewed**

For an outline of the materials required for all amendment submissions, please refer to [UCLA OPRS Addendum Submission Checklist](#) and [OPRS/IRB Policy 7: Materials Required for IRB Review](#).

## **VII. Anticipated Deviation From the Approved Protocol**

- A. In the event that an investigator anticipates the need to deviate from the previously approved protocol for a particular subject (e.g., a change to procedure schedules, waiver of inclusion/exclusion criteria), the investigator may submit a "single subject addendum." The following information should be submitted to OPRS along with any other relevant information or materials as described in (II) above:
1. An explanation of the protocol criteria involved and how the subject's condition differs, constituting an exception to the protocol.

2. An explanation why the deviation/exception is appropriate or necessary.
3. An explanation of how the deviation/exception affects the risk/benefit assessment for this subject.
4. An explanation of whether the current IRB-approved consent form adequately covers this exception. If not, a revised consent form should be included.
5. Information regarding the sponsor's approval of the exception. If the sponsor has approved the exception, documentation should be included.

**Regulations:**

45 CFR 46.103(b)(4)  
45 CFR 46.110(b)(2)  
45 CFR 46.111  
21 CFR 56.108(a)(4)  
21 CFR 56.110(b)(2)  
21 CFR 56.111

**References:**

OHRP Guidance on Written IRB Procedures – January 15, 2007  
<http://hhs.gov/ohrp/humansubjects/guidance/irbgd107.pdf>

OHRP Guidance on the Use of Expedited Review Procedures – August 11, 2003  
<http://hhs.gov/ohrp/humansubjects/guidance/exprev.pdf>

**Attachment:**

OPRS-20      UCLA IRB/OPRS Addendum Checklist  
<http://oprs.ucla.edu/human/forms/checklists>