AMENDMENTS

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Agenda
– General Principles
– Types of Amendments
– Special Situations
– The Amendment Form
– Amendments and the Electronic Workflow
– Financial Implications
– Questions

GENERAL PRINCIPLES
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ALL study modifications including changes in the protocol or informed consent documents or process, changes in staffing, advertisements, number of subjects to be enrolled, questionnaires or any other change in the approved application must be submitted to the HSRO for approval.

IMPLEMENTING THE CHANGES

• All proposed amendments to currently approved studies require approval prior to implementing the change.
• Exception: when the change is necessary to eliminate apparent immediate hazards to human subjects
  – PI must notify the IRB of such changes in writing within ten (10) working days of the occurrence

AMENDMENTS AND APPROVAL PERIODS

• Modifications will only be approved for studies with active IRB approval
• Approval of a study amendment shall not extend the length of study approval or the expiration date of that approval
TYPES OF AMENDMENTS

• Informational Amendments
  – Changes that are informational or editorial without risk implications for human subjects

• Minor Procedural Amendments
  – Changes that alter procedures and have no potential implications for human subjects

• Risk Relevant Amendments
  – Changes that may affect risk to human subjects in a manner that may not be considered as “minimal.”
  – Often reflect changes in the direction of a study that may substantially change its purpose or goals.

EXAMPLES OF INFORMATIONAL AMENDMENTS

• Addition of a study team member
  – Change in PI may change risk determination
  • Not an informational amendment

• Replacement of a study team member into a position for which he/she is similarly qualified

• Changing a study title

• Changing a department affiliation or phone #

• Deleting items from a questionnaire without material change to the study

• Revision of the format of consent documents, recruitment materials or questionnaires
PROCESSING OF INFORMATIONAL AMENDMENTS

• Pre-screen determines if it fits the informational category
• Forward to an HSRO Administrator authorized as an administrative-designee
  – May request additional information from the PI
  – Approve
  – Refer to the IRB chair or convened IRB.
  – **May not disapprove the amendment**

EXAMPLES OF MINOR PROCEDURAL AMENDMENTS

• Drawing slightly different amounts of blood
• Changing the frequency at which blood is drawn
• Adding to the number of planned research participants
• Revising the content of the consent form
• Decreasing drug dosage/frequency of administration
• Changing the recruitment plan
• Adding a standard quality-of-life questionnaire
• Adding non-sensitive questions to a questionnaire
• Initiating videotaping of subjects

PROCESSING MINOR PROCEDURAL AMENDMENTS

• Pre-screen to confirm that they fit in category
• Forwarded to the IRB chair or IRB-designee
  – May request additional information from the PI
  – Approve the amendment on an expedited basis
  – Refer to the convened IRB.
  – **May not disapprove the amendment**
**MINOR PROCEDURAL VS. RISK RELEVANT PROCEDURAL**

- Minor Procedural Amendments do not alter the risk/benefit ratio
- Minor Procedural Amendments are not significant in complexity or content to affect a subject's decision to participate or continue to participate
- Changes proposed in Minor Procedural Amendments pose no more than minimal risk to subjects

**EXAMPLES OF RISK RELEVANT PROCEDURAL AMENDMENTS**

- Adding a new activity that may increase risk to participants
- Changing study drugs or medications
- Adding a vulnerable population
- Changing radiation exposure
- Making substantive changes to questionnaires or interviews
- Adding or changing invasive procedures
- Adding a research arm to the study

**PROCESSING OF RISK RELEVANT PROCEDURAL AMENDMENTS**

- Pre-screen
- Referred to the convened IRB for review and approval
  - May shorten the approval period
  - May require a separate review, or a higher level of review of the study than was received on the original or most recent continuing review
  - May require revisions to other study materials
SPECIAL SITUATIONS

CHANGING PRINCIPAL INVESTIGATORS

• May be reviewed on an expedited basis
  – Letter from the current PI indicating the change and its reasons
  – Letter from the new PI accepting responsibility for the research

• If PI is unable to provide an explanatory letter, request may come from the Department Chair or the Center Director

• If PI holds an IND, he/she must write a letter to the FDA indicating that he/she is turning over the IND number and responsibilities to the new PI
  – New PI must write a letter to the FDA indicating acceptance of the responsibility for the IND number and that all documents relating to the IND have been transferred to him/her

INFORMATIONAL MATERIALS

• Informational materials may be submitted via a Notification form
  – Investigator's Brochures
  – External IND safety reports
  – Package inserts

• If further action is required, the IRB chair may request modifications from the PI or may refer the submission to the convened IRB
STUDY EXCEPTIONS

• There may be occasions when the Principal Investigator wishes to make a temporary change in a protocol or a change that pertains only to one or a few participants.

• These temporary or limited changes are defined as "study exceptions".

EXAMPLES OF STUDY EXCEPTIONS

• Enrollment of a study participant who does not meet the eligibility criteria
• Changing the dose of a study medication
• Changing a visit date
• Adding an extra visit or omitting a visit

PROCESSING OF STUDY EXCEPTIONS

• Must receive IRB approval prior to its initiation and must be listed in the ensuing continuing report.
• Review of study exceptions follows policies for review of Amendments.
  – Takes into account all relevant materials
  – Includes a determination whether the exception falls either within the specified guidelines of the approved protocol or is specifically approved by the sponsor.
  – Based on a determination whether exception can affect the well-being of subjects (either favorably or adversely).
INFORMATION TO INCLUDE IN STUDY
EXCEPTION REQUESTS

• What are the limitations of the exception
• Why the exception is the best choice for the subject
• How the exception differs from the approved protocol
• Whether the trial sponsor (if any) approves the exception
• Whether the data collected as a result of the exception will be analyzed in a manner different from that of other data
• Whether the exception changes the risk/benefit
• Whether or not an amendment to the study is intended to follow

THE AMENDMENT
FORM

1. Amendment Identification

1.1* Source of Amendment

If sponsor-initiated, please answer the next two questions:

1.1.A Sponsor's Amendment Version Number:

1.1.B Amendment Version Date

1.2* Type of Amendment

Check all that apply

Informational
Minor Procedural
Risk-Relevant Procedural

Note: For an explanation of the 3 types of amendments, please refer to Types of Amendments and their Review on the HSRO website.
1. Amendment Identification

1.3. * The proposed change(s) will affect:

Check all that apply

- UM Protocol Form
- Conflict of Interest
- Data Safety Monitoring Plan
- Drug/Device (i.e. IND, IDE, composition, amount, schedule, administration, combinations with other drugs/devices)
- Editorial Changes
- HIPAA Compliance
- Informed Consent Process/Document(s)
- Principal Investigator or other study personnel (any additional personnel require proof of CITI certification)
- Methods and Procedures (i.e. selection criteria, recruitment method, data collection and analysis)

1.3.A. If Other, please specify:

- Research Protocol Title
- Sponsor/Funding Source or Drug/Device Supplier
- Study Design (i.e. protocol, clinical activities, interventions, study length, study objectives)
- Subject Enrollment (number of study participants)
- Subject Population
- Foreign Language Consent Form(s)
- Performance Sites (modification to the local, national or international study sites)
- Risk/Benefits
- Questionnaires/Assessments
- Other (i.e. data collection form/abstracting form, etc.)

1.4. * Is this study currently approved by WIRB/CIRB? (Please select “No” if this study is returning to the UM IRB)

☐ Yes ☐ No ☐ Clear

1.5. * Does this Amendment:

1. add or remove Jackson Health Systems (JHS) as a performance site; or
2. seek to change activities performed at Jackson Health Systems (JHS); or
3. seek to change expenses incurred by Jackson Health Systems (JHS)

☐ Yes ☐ No ☐ Clear

2. Amendment Information

2.1. * Please provide a precise description of all proposed changes to the research. Describe each proposed change in detail, and state the reason(s) why the proposed change(s) is/are necessary at this time:

2.2. * In your opinion, will the proposed change(s) affect the risk-benefit ratio of the research?

☐ Yes ☐ No ☐ Clear

2.2.A. If yes, please explain how the risk-benefit ratio may be affected:
2a. Informed Consent

2.3* Will the proposed change(s) affect the informed consent process and/or documents?
   ☑ Yes ☐ No Clear
   If yes, please answer the following questions (2.3.A.–2.3.C.):

2.3.A. Please explain how the proposed changes will affect the informed consent process and/or documents:

2.3.B. Will these changes impact, in any way, the safety and welfare of currently enrolled subjects?
   ☑ Yes ☐ No Clear
   2.3.B.(i) If yes, please explain:

2.3.C. Will it be necessary to disclose the change(s) to subjects who have already completed their participation in the research?
   ☑ Yes ☐ No Clear
   2.3.B.(i) If yes, please explain how this will be done:

2b. HIPAA – Accessing PHI

2.4* Will the proposed change(s) affect the HIPAA approval previously granted by the IRB?
   ☑ Yes ☐ No Clear
   If yes, explain how the proposed change(s) will affect the HIPAA form(s) previously reviewed and approved by the IRB. In your explanation, please address whether it will be necessary to disclose the change(s) to those subjects who have already authorized the use and disclosure of their protected health information, and how this will be done:

3. Supporting Document Submission

3.1 Please submit any supporting documents (i.e. sponsor letters, new findings in the literature, etc.) for this amendment for the IRB's consideration.

Please do not submit modified consent forms/documents, recruitment materials, or other documents originally submitted with the protocol here; any changes to those documents must be made directly on the protocol record.

3.2 If applicable, upload WIRB/CIRB submissions:

Note: The addition of any local, national or international performance site will require documentation of appropriate review in accordance with HSRO policies and procedures.
Electronic Submission Instructions

1. Click Edit Protocol to update the protocol.

2. Execution of the “Submit Amendment” activity will move the amendment to the “Originating Department Review” state.

3. Once the Originating Department approves the amendment, it may require “Ancillary Committee Review.”

4. When the Amendment reaches the HSRO office, the study state will reflect “Pre-Board Review.”

AMENDMENTS AND THE ELECTRONIC WORKFLOW

IT ALL BEGINS WITH YOUR APPROVED STUDY IN ePROST
AN AMENDMENT IS CREATED/SUBMITTED
YOUR AMENDMENT GETS APPROVED
UNIVERSITY FEES APPLICABLE TO AMENDMENTS

• **Who** gets charged?
  – All studies supported by for-profit sponsors and/or agencies/foundations that do not otherwise cover IRB fees through indirect costs to the institution or other mechanisms and contractually allow for processing of IRB fees

• **Who doesn’t** get charged?
  – Investigator-initiated/No extramural funding
  – Federally-funded

UNIVERSITY FEES APPLICABLE TO AMENDMENTS

• **What** gets charged?
  – Any risk-related or minor procedural change to the IRB-approved protocol/application

• **What doesn’t** get charged?
  – Informational Amendments
  – HSRO/IRB-Requested Amendments
    • e.g. removal of JHS as a site if disapproved by JHS-CRRC
UNIVERSITY FEES APPLICABLE TO AMENDMENTS

• HSRO Fee Schedule
  Revised June 1, 2009
  – Initial Research Protocol $2,800.00
  – Continuing Report $1,300.00
  – Request for Amendment $550.00
  – Reactivation of a Study that has Lapsed in IRB Approval $400.00
  – Administrative Study Closure $500.00
  – Final Report $250.00

QUESTIONS???

CONTACTS AT THE HSRO

• Front Desk/Help Desk: 305-243-3195
• Education/Training
  – Joey Casanova, CIP 305-243-9232
• Regulatory Questions
  – Amanda Coltes-Rojas, CIP 305-243-6494
  – Evelyne Bital, CIP 305-243-9977
• Financial Questions
  – Jeanette Mestepey 305-243-9940