



Human Subjects Protection
Program Investigator Guidance
September, 2023

AMENDMENTS TO CHLA IRB APPROVED RESEARCH

Overview

- This guidance applies to CHLA IRB approved research.
- All amendments to currently approved research must be approved by the CHLA IRB prior to implementation, except when necessary to eliminate apparent immediate hazards to the participants.
 - Amendments or changes to the protocol are sometimes referred to as “modifications”, “changes in research” or “addenda.”
 - In the iStar system they are referred to as “Amendments.”

Minor and Major Amendments

- Amendments that are considered to be minor amendments can be reviewed using an expedited review procedure that is performed by a designated IRB member.
 - NOTE:** Minor amendments do not affect the design of the research, add no more than minimal risk to participants and any added procedures fall into the federal expedited review categories of research.
- Amendments that are considered to be major amendments to more than minimal risk research require IRB review at a convened meeting.
- Major amendments to studies that were initially determined to involve no more than minimal risk may also require IRB review at a convened meeting.

Examples of Minor and Major Amendments

- The following table provides examples of minor changes and major changes to previously approved research.

- NOTE:** These examples are provided as guidance for investigators, but the IRB will make the final determination of whether an amendment is minor or major.

MINOR AMENDMENTS	MAJOR AMENDMENTS
<ul style="list-style-type: none"> <input type="checkbox"/> Administrative changes <input type="checkbox"/> Minor consent form changes <input type="checkbox"/> Minor changes to recruitment procedures, recruitment materials or submission of new recruitment materials to be used in accordance with approved recruitment methods <input type="checkbox"/> Minor changes to study documents such as surveys, questionnaires or brochures <input type="checkbox"/> New study documents to be distributed to or seen by subjects that are similar in substance to those previously approved <input type="checkbox"/> Changes in payment to subjects or the amount subjects are paid or compensated that are not significant enough to affect the risk/benefit ratio of the study <input type="checkbox"/> Decrease in the number and volume of sample collections as long as they do not negatively alter the risk/benefit ratio of the study <input type="checkbox"/> Editorial changes that clarify but do not alter the existing meaning of a document <input type="checkbox"/> Addition of or changes in study personnel <input type="checkbox"/> Addition of a new study site (in many but not all cases) <input type="checkbox"/> Translations of consent and assent documents already reviewed and approved by an IRB 	<ul style="list-style-type: none"> <input type="checkbox"/> Changes that affect the risk/benefit ratio of the study or specifically increase the risk to subjects <input type="checkbox"/> Changes in inclusion/exclusion criteria that impact the risk/benefit ratio of the study <input type="checkbox"/> Significant changes in study design, such as the addition of a new subject population or the elimination of a study arm <input type="checkbox"/> New risk information that is substantial or affects the risk/benefit ratio of the study <input type="checkbox"/> Addition of a new study drug or device <input type="checkbox"/> Significant changes to the study documents to be distributed to or seen by subjects <input type="checkbox"/> New study documents to be distributed to or seen by subjects that include information or questions that are substantively different from materials already approved by the IRB. <input type="checkbox"/> Changes to the PI of the study <input type="checkbox"/> New or revised financial conflict of interest management plans for study team members (PI, Co-PI, key personnel)

Investigator Responsibilities

- All protocol amendments must be submitted to the CHLA IRB as an amendment in iStar.
- Provide the IRB with complete descriptions of the amendment, including the rationale(s) for the amendment and the anticipated impact upon current and future subjects.
- Do not delete any previously uploaded documents from iStar unless directed to do so. Deleting previously uploaded documents may require the withdrawal of the amendment application to restore the previously uploaded documents.
- To upload a revised document into iStar, use the “Upload Revision” function (available by clicking on the ellipsis next to the currently uploaded form). This allows the IRB to compare the form with the previous version within the iStar application. It also keeps the application organized so that only the current version of a particular document shows but the previous versions are still accessible if needed.
- For pdf documents, provide tracked (red-line) changes to any revised supporting materials related to the amendment (e.g., informed consent documents, questionnaires, sponsor protocol).
- For complex amendments, a “summary of changes” document should be included with the amendment submission.
- If consent and assent documents will be translated into other languages, certified translations of these documents must be approved before use with participants. The version dates of the translated documents must match those of the approved English versions. Certificates of translation need not be included with the amendment submission, but the certificates should be retained in the study team’s study files/regulatory binder.
- Translations of other approved study materials (recruitment flyers, questionnaires, etc.) need not be submitted to the IRB. However, if the study is a single IRB review study where CHLA is the Reviewing IRB, translated recruitment materials must be submitted.
- If new funding is awarded to support the scope of the research as currently approved, an amendment to the existing application may be appropriate. However, if the study design, objectives, etc. will change considerably then a new application is required.
- Revisions to Investigator’s Brochures (IB) must be submitted in iStar by the Principal Investigator (PI). If they are not submitted by the PI, they will be returned to the study team for re-submission by the PI. If the PI is away, another

physician investigator on the study team may submit the amendment on the PI's behalf. IB revisions must be submitted for IRB review as soon as possible and no later than 2 weeks from the date of receipt by the PI.

- If you are submitting an amendment as a result of a reportable event, refer to the reportable event (e.g., CHLA- 23-00010- RE001) in the amendment application.
- Amendments may be submitted concurrently with a continuing review application.
- Wait for an IRB Approval Notice **before** implementing any proposed amendments.

Amendments to Change the PI of the Study

- The current PI must inform the IRB about the transfer as soon as possible and plan for the timely submission of their amendment application prior to and in advance of their CHLA departure date.
- The amendment application should include:
 - Changes to study documents (i.e. protocol, recruitment documents, consent and assent forms, research monitoring plan); and
 - A plan for informing current subjects of the PI change.

Changes Made to Avoid Immediate Apparent Hazards to Participants

- Investigators should communicate with their sponsors and funding agencies when protocol changes and/or deviations are required in order to eliminate apparent immediate hazards to research participants.
- If a protocol change or deviation is required to eliminate an apparent immediate hazard to research participants, the investigator should make whatever changes are needed to protect the safety and welfare of the participants and may do so without prior IRB review.
 - NOTE:** Changes or deviations made without prior IRB approval must be submitted as a reportable event in iStar within five working days. These reportable events **may not** be auto-acknowledged.

Period of Approval for Amendments

- The approval period for amendments will coincide with the expiration date of the protocol approval.