Any proposed change or revision to an approved research study that affects human subjects (with certain limited exceptions discussed below), must be reviewed and approved by the Institutional Review Board (IRB) prior to implementation of the change. This includes any change made at individual performance sites for Community Research Institutional Review Board (CRIRB) research studies. 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 research study. The approval simply approves the modification or revision to the research study and allows investigators to begin using the modified or new documents, procedures, etc. The principal investigator must receive a letter from the IRB approving the proposed revisions before the changes are implemented. For CRIRB research studies, the CRIRB chair will pass the approved changes on to designated individual(s) at the performance sites.

If the investigator wishes to add or remove an individual as personnel from the research study, they may do so by submitting a personnel change form to the IRB office. This type of change is considered an administrative change and does not require review by an IRB member or the IRB. An IRB staff member will review the personnel change and once they have made the personnel change, the investigator will be notified.

**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 to the IRB immediately thereafter. See the Human Research Protection Program (HRPP) Manual 9-5 “Unapproved Change in Protocol” for policies and procedures.

**Definitions**

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**Michigan State University**

**Human Research Protection Program**

**Subject:** Revisions to an Approved Research Study

**Section:** 8-6

*This policy and procedure supersedes those previously drafted.*

**Approved by:** Vice President of Research and Graduate Studies, 4-21-2005. Revision 1 approved by VP Research & Graduate Studies on 4-5-2006. Revision 2 approved by VP Research & Graduate Studies on 3-9-2008. Revision 3 approved by VP Research & Graduate Studies on 5-6-2008. Revision 4 approved by VP Research & Graduate Studies on 9-3-2009. Revision 5 approved by VP Research & Graduate Studies on 7-22-2011.

**Related Sections:** 6, 8, 8-2, 8-3, 9-5
Risk
The probability of harm or injury (physical, psychological, social, legal, or economic) occurring as a result of participation in a research study.

Minimal risk (minor risk)
“[M]eans 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. Minor modifications cannot include addition of procedures that involved more than minimal risk or do not fall into categories (1) – (7) of research that could be reviewed using the expedited procedure. Examples may include but are not limited to minor changes in: funding, 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 research study’s review level is not already full review and the change requested is considered a non-minor change, the study’s review level will be changed to full review. See HRPP Manual 8 “Types of IRB Review” for policies and procedures related to change in review level and/or category.

The IRB member reviewing the research study makes the determination on whether the change is non-minor. 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 meeting. For research studies in which it is not clear if the change is more than minor, the study may be sent directly to the convened IRB or to one or more physician IRB members (medical) or one or more 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 research study will be reviewed using the expedited review procedure, and an approval letter may be issued once reviewer(s) approve the change. See HRPP Manual 8-2 “Expeditied Review Procedure.”

**Materials Required for Submission**

The investigator is required to complete and submit the revision form using the MSU IRB online system. The online revision application 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.

**Mechanism(s) for Submission**

MSU IRB revision applications must be submitted via the MSU IRB online system. The MSU IRB online system will not allow submission of an incomplete application.

The principal investigator (PI) must log in, and check that s/he has read the signature assurance language to submit the revision application. Only the PI may submit a revision application, and such submission constitutes an electronic signature.

**Submission Processing**

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

**How Review is Conducted**

See the following HRPP Manual sections for review procedures: 8-2 “Expeditied Review Procedure” or 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 research studies, 21 CFR 56. The criteria for IRB must be met to approve or recommend approval of the application. The IRB member(s) should utilize Section 6, “IRB Evaluation Criteria” of the HRPP Manual.
When reviewing modifications to an approved research study (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 HRPP Manual 6, “IRB Evaluation Criteria” 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 research study’s review level and/or category (See HRPP Manual 8, “Types of IRB Review” for policies and procedures related to change in review level and/or category)
- Overall effect of change on research study
- Whether change requires a modification to the consent process and/or form
- Whether the change involves:
  - Vulnerable populations
  - Addition of sensitive questions
  - Privacy and/or confidentiality considerations
- Effect of the change on subjects’ willingness to continue the study
- Whether information should be provided to past or currently enrolled subjects:
  - Use of an information sheet vs. re-consent
  - If provided, the adequacy of information sheet or re-consent document
- Whether there are any significant new findings that arise from the review process and that might relate to subjects’ willingness to continue participation are provided to subjects