

**SOP#: RPS-12**

**NIH IRB Submission of Amendments**

**Version #: 2.1**

**Next Review Date: 08/2022**

**Approved Date: 12/2020**

**Review Interval Period: Biennial**

**NCI Clinical Director Signature:**

  
William L. Dahut, MD 12/30/2020

## **POLICY**

Any changes in research activities during the period for which IRB approval has already been given may not be implemented by Principal Investigators (PI) without prior IRB review and approval, except when necessary to eliminate apparent immediate hazards to the subject.

## **PURPOSE**

To identify the process in which a protocol amendment is submitted to the IRB for approval.

## **RESOURCES**

- NIH Office of Intramural Research Policies & Guidance [website](#)
  - Policy 106 - *Ancillary Reviews*
  - Policy 204 - *Levels of IRB Review and Criteria for IRB*
  - Policy 205 - *Requirements for IRB Submissions*
  - 400 Series - Regulatory Protections for Vulnerable Populations, as applicable
  - 500 Series - FDA Requirements for Human Subjects Research and Data and Safety Monitoring, as applicable
  - 700 Series - International Research Requirements, as applicable
- iRIS Helpful Documents [website](#)
- Institutional Review Board Office (IRBO) Ancillary Reviews [website](#)

## **PROCEDURES**

### **STEP 1: Prepare Revised Documents**

- Create a new amendment folder in the relevant protocol folder on the CCR PSO Share Drive.

#### **Protocol**

- Retrieve the most recent approved version of the clean protocol
- Turn on track changes in Microsoft Word prior to making changes
- If an outside Sponsor's study, the version date in the Supplement may not match the Sponsor's amendment version date; therefore, both the Sponsor's version date and the Supplement version date should be included on the Supplement title page
- Make changes to protocol per PI instructions and/or outside Sponsor's amendment
- Compare the protocol to the NIH protocol template and make updates as needed

- Protocol title page should include the new Amendment letter (if applicable) and new version date
- Update the header in the protocol with the new version date. No amendment letter should be in the protocol header.
- Update Table of Contents in the protocol
- Save tracked versions of the protocol in the new amendment folder
- If the amendment involves a:
  - Change in the accrual ceiling, create a revised Planned Enrollment Form and/or verify the new enrollment distribution with the PI.
  - Change in dosimetry per RSC requirements, create a new or revised RSC Totals Worksheet/ICF Guide and update the protocol and consent per RSC template language.

### **Informed Consent**

- Download the approved consent(s) from iRIS, Word version.
- Turn on track changes in Microsoft Word prior to making changes
- Make changes to document per PI instructions and/or outside Sponsor's amended consent.
- Compare the consent(s) to the NIH consent template and make updates as needed.
- Update the first page in the consent(s) and the footer with the new version date.
- Save tracked versions of the consent(s) in the new amendment folder.
- If the consent amendment involves a change in dosimetry per RSC requirements, create a new or revised ICF Guide and update the consent per RSC template language.

### **STEP 2: Create Cover Memo**

- The date on the cover memo should match the new version date
- Add a paragraph or two at the beginning of the memo to summarize the main purpose(s) of the amendment
- List in detail all changes to the study application, protocol, consent(s) and study personnel list (KSP) as applicable and provide a rationale for each change
- Include reference to the revised IB (if included with the amendment)
- Use the tracked version of each amended document to verify memo details
- Save the cover memo in the appropriate protocol amendment folder

### **STEP 3: Send Revised Documents to PI and team for review**

- Send all tracked documents and cover memo (include planned enrollment form, dosimetry table or revised IB, if applicable) to the PI and research team for approval
  - Save all correspondence with team regarding the amendment in a correspondence sub-folder of the amendment folder

- Once approved by the PI, save the following in the protocol's amendment folder:
  - Tracked versions of the protocol and consent(s) (and study personnel list as applicable)
  - Any other relevant forms: revised IB, RSC approval (when applicable), etc. that may need to be attached to the Amendment Form.

**STEP 4: Submit to Sponsor and/or Manufacturer (if applicable)**

- Submit Amendments and applicable documents to protocol Sponsor and/or Manufacturer for review and/or approval (as applicable per agreement terms)

Note: In most cases, this step must be completed before sending the Amendment to the IRB.

**STEP 5: Submit for Scientific Review in iRIS if Amendment Meets Center for Cancer Research (CCR) Requirements**

**STEP 6: Initiate the iRIS Forms in preparation for QC and submission to IRB**

- Create a revision to the Study Application in iRIS and update it with any changes that correspond to the amendment.
- Complete and submit Deputy Ethics Counselor (DEC) form if applicable
- Create a new Amendment Form in iRIS and fill in any details that correspond to the amendment:
  - Select the type of changes relevant to the amendment
  - Add the exact amendment letter (if applicable)
  - Check the KSP in iRIS to ensure KSP are listed correctly
  - Review that all relevant forms for the amendment have been completed or are in progress

**STEP 7: Send Amendment for QC**

- Send the JIRA Task to PSO Director for QC.

Note: Do not attach protocol, consent(s) or cover memo to the Amendment Submission Form until after QC.

**STEP 8: Submit in iRIS**

- Finalize the Amendment Form in iRIS by marking the changes (as applicable)
- Attach the following documents to the Amendment Form:
  - Point by point cover memo (including the Sponsor and/or Manufacturer summary of changes, as applicable)
  - Study Application (if changes were made in the application)
  - Clean protocol and Supplement if applicable (if revised)
  - Tracked protocol and Supplement if applicable (if revised)
  - Clean consent(s) (if revised)
  - Tracked consent(s) (if revised)

- Study Personnel List (KSP) tracked and clean versions (if applicable)
- SRC minutes and approval (if applicable)
- DEC clearance (if applicable)
- RSC approval (if applicable)
- Investigator's Brochure (if applicable)

Note: Upload amendment documents in iRIS. For clean protocol and consent, upload by creating a revision of the approved document using the 'create a revision' function. Make sure to enter the document's new Version Date within the document attachment window.

- Route the Amendment Form for signatures
  - Assign for signature as indicated in iRIS

### **STEP 9: Respond to Stipulations (if applicable)**

- Create a new subfolder in the specified protocol Amendment folder for Response to IRB Stips or Response to IRB Pre-Review as applicable
- Save the IRB Stipulation/Request for Correction Memo outcome letter in the folder for reference
- Draft the response on the protocol and consent documents:
  - When responding to IRB Pre-Review comments use the tracked amendment documents
  - When responding to IRB Stipulations use the clean versions of amendment documents (and track the new changes)
  - Assign a new Version Date for all updated documents.
  - Contact PI to discuss any items that require their input and/or their final approval.
    - Save relevant correspondence with PI regarding the amendment review/response input in the amendment sub-folder
  - Incorporate any outstanding changes at this point (i.e. FDA requests, Sponsor changes) **only if necessary** – IRB will need to send the response back to full board review if additional changes are made outside of those required by the stipulations.

Note: Response to stipulations must be submitted by the Due Date on the IRB Outcome Letter. Extensions can be granted in extenuating circumstances by emailing the NIH IRB main email account.

- Enter the explanation of the changes for each stipulation/correction in the Review Response Submission Form in iRIS. Indicate section numbers where changes were made in the response text box as applicable.

Note: Tables cannot be pasted into text boxes in iRIS.

- Review the tracked protocol and/or consent to ensure the changes have been made consistently.
- Review the changes against the stipulations/corrections itemized in iRIS to ensure that all changes are documented, and the iRIS Study Application and Amendment Form have been updated as necessary.

- Create final versions of the protocol and consent (clean and tracked), making sure to update Table of Contents (TOC) and pagination as needed
- Upload all updated documents in iRIS by creating a revision of each relevant submission document using the 'create a revision' function, as applicable. Make sure to enter the document's new Version Date within the document attachment window.
- Assign for signature as indicated in iRIS

#### **STEP 10: IRB Approval**

- The PI and Study Contacts will be notified of approval through iRIS Notification.
- Within the Amendment folder, create an Approved Documents subfolder and save the following documents from iRIS:
  - IRB outcome letter(s)
  - Approved consent(s) as downloaded from iRIS
  - Final, clean version of the protocol
  - Cover Memo
  - Amendment Form
  - Review Response Submission Form(s) as applicable
  - Study Application (if changes were made in the application)
- Save the approved documents in the regulatory file.
- Forward copies of approved documents as needed, i.e. Sponsor, multi-center sites, etc.
- Email IRB approval notification to PI and Study Coordinator with tracked change amendment documents as a notification of the approved protocol changes.

#### **STEP 11: For Protocols with Foreign Language Long Form Consents**

- Submit an NIH Translations request [here](#) for any foreign language long form consent(s) once the IRB amendment approval has been received.
  - Create a new sub-folder for Consent Translation in the specified Amendment folder and save any Correspondence regarding the translation in this folder
- Once the translated long form consent(s) is/are received from NIH Translations, submit an Amendment Form in iRIS. Include the:
  - Translated long form consent(s) (clean version, and tracked versions as applicable)

**Note:** Ensure the consent version date matches the standard consent.

  - Translation Certification(s) of Accuracy
  - Complete the remainder of the Amendment Form
- Assign for signature as indicated in iRIS
- The PI and Study contacts will be notified of IRB consent approval (and translation certification of accuracy acknowledgement) through an iRIS notification from IRB.

- Within the Amendment subfolder for Approved Documents save the following documents from iRIS:
  - IRB outcome letter
  - Approved long form consent(s) as downloaded from iRIS
  - Translation Certification(s) of Accuracy
  - Amendment Form
  - Study Application (if changes were made in the application)
- Save the approved documents in the regulatory file.