Institutional Review Board (IRB)
The Office for Research Protections
University Park | 814-865-1775 | ORProtections@psu.edu

Human Subjects Protection Office
Penn State College of Medicine | Penn State Milton S. Hershey Medical Center
Hershey | 717-531-5687 | hspo@psu.edu

Guide to Determining Substantive vs. Minor Changes in Research

This document provides guidance for determining whether proposed changes to research are substantive or minor, and includes examples to determine when a project may be approved contingent on completion of minor changes.

Substantive Changes

Revisions involving more than minimal risk to the research participant or substantive changes must be reviewed and approved by the full IRB.

These include major changes in the direction of the study that may substantially change the purpose of the study or the risk/benefit ratio, or may impact a participant's decision to remain in the research.

Examples include:

- A change in the principal investigator for an investigator written study.
- Requests for submission of a data safety monitoring plan.
- Changes that might increase the physical and/or psychological risks or harm or discomfort to the subject
- Major change in study design that increases risk (e.g., revisions to broaden eligibility criteria, additions or deletions of research groups). Some changes in entry criteria may qualify for expedited review, such as a change to improve safety.
- Major change in the purpose of the study
- Changes in the treatment or drug dosage or frequency
- Changes to the consent form to include newly identified side effects or adverse events
- Adding questions that ask for sensitive information (e.g., depression or sexual behavior questions where data are linked to subjects' identities)
- Adding a new procedure that substantively changes risks of harm (e.g., addition of a procedure involving radiation hazard, a questionnaire on sensitive information not previously included, addition of a drug or device

Minor Changes

Minor changes include modifications and clarifications that:

1. do not substantively change the risk/benefit ratio to a participant;
2. would not change the IRB's conditions for approval; and
3. would not impact a participant's decision to remain in the research.

Minor Changes continued

The IRB Chair(s), or their designee(s), may review the following types of minor changes/revisions through an expedited procedure:

- Informational revisions with no potential impact on the risks for participants such as minor changes involving editorial, grammar, semantic or format changes to the consent form or protocol that do not affect context or substance

- Resolution of discrepancies within the IRB review materials (application form, protocol, consent materials) such as numbers of subjects, number and identity of research sites, identification of research staff and co-investigators, timing, nature, and duration of research procedures provided that the corrections are being made to reflect what the IRB has reviewed and approved at the convened meeting.

- Responses received to address omissions from the IRB materials such as letters of cooperation from non-affiliated research sites, confidentiality agreements, federal Certificates of Confidentiality, and documents certifying regulatory compliance (e.g., reports or approvals from the Human Use of Radioisotopes Committee or Institutional Biosafety Committee). The IRB must be aware of these approvals and this is only for the receipt of the documentation.

- Changes in the recruitment plan or recruitment materials to improve clarity, enhance comprehension, or respond to minor discrepancies

- Changes in consent materials to improve clarity, enhance comprehension, change telephone numbers and contact information, to update materials to incorporate IRB approved boiler plate language, or to include IRB-required changes

- Changes in research procedures that have a minor impact on risks of harm, such as changes in the size and frequency of blood draws while still within the guidelines for expedited activities; addition of a clinic visit that involves no new procedures, or addition of a questionnaire that does not introduce new subject matter

- Extending the time period of the study to include only follow-up with the research participants

- Minor changes in the participant compensation (that would not constitute undue influence)

- Changes in data collection instruments to add or delete non-sensitive questions that do not increase risks of harm to subjects; adding a standardized test or a quality-of-life questionnaire

- Changes to add or delete staff that do not alter the competence of the research team to conduct the research (excludes principal investigator changes for full board studies and investigator-written studies)

- For investigator-written, full-board studies, increases or decreases in numbers of subjects that involve no more than 25% change

- Any increase or decrease in numbers of subjects for multi-site clinical trials where the overall study enrollment does not change

- For a multi-site study where the project director is local, changes in research sites to delete a research site or add a research site where IRB approval has been obtained from the new site and the facilities and investigator qualifications have been ascertained

- Any changes in research sites for multi-site studies where the project director is not local

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