such a case, the modification must be promptly (no longer than 30 days) reported to the IRB via a reportable event, and the IRB will review the change to determine that it is consistent with ensuring the research subjects' continued welfare.
2. SmartForm updates such as changes to non-key personnel, contact information, or project durationshould be filed with the IRB in eBridge as described in this procedure prior to initiating the changes.

SUBMITTING AMENDMENTS

1. Amendments must be reviewed and approved prior to incorporating the proposed change(s) into the project. When an Investigator receives an amendment or a request for change to the approved project, they must submit the amendment promptly to secure final IRB approval within 90 days from notification of the change. In addition, Investigators and project teams should work to respond quickly to any requested modifications to meet this expectation. This timeframe ensures the changes can be implemented in a timely process to protect the rights, safety, and welfare of their subjects and that the continued conduct of the project is carried out in accordance with the protocol.
2. Examples of changes that need review by the IRB include but are not limited to:
    a. Change in PI
        i. This change requires the new PI to complete and sign the *Agreement of Investigator Responsibilities form* and upload this document into the Project Workspace.
    b. Increase or decrease of enrollment numbers
    c. Adding or removing a subject population (such as minors)
    d. Change in recruitment methods
    e. Change in the consent form
    f. Change to an Investigator Brochure or device information
    g. Change in procedures
    h. Adding or dropping an arm of the project
    i. Change to questionnaires, surveys, interview scripts
    j. Change in funding
    k. Change in the title of the project
    l. Addition of new project sites or locations which will be under the direction of the Principal Investigator. For more information see *IRB SOP: Reliance Agreements for Multi-Site Projects.*
    m. Change to the approved NIH Data Management and Sharing Plan

3. Investigators must describe the changes proposed to the approved project in the eBridge AME SmartForm. The Investigator should include in the description where the changes are cited in the eBridge PRO SmartForm, any change to the consent form (if applicable), or revisions to other project-related documents including but not limited to protocol summaries, data collection forms, surveys, or questionnaires. In addition, Investigators must provide the rationale for the changes to the project.

Other Federal Agencies Requirements:

1. For projects that receive funding from a federal agency ormay be subject to additional federal agencyspecific requirements,the following must be applied and considered during the review process:
    a. **Department of Defense:** All substantive amendments to approved research must undergo scientific review prior to IRB review.
        i. The USAMRMC HRPO defines a substantive modification as a change in Principal Investigator, change or addition of an institution,

elimination or alteration of the consent process, change to the project population that has regulatory implications (e.g., adding children, adding active duty population, etc.), significant change in project design (i.e., would prompt additional scientific review), or a change that could potentially increase risks to subjects.

ii. Documentation of this scientific review must be included with the amendment documents or indication from the funding agency if this was not required.

Reviews Prior to IRB Review:

Some amendments may require review by various Institutional, administrative or ancillary committees prior to being reviewed by the IRB. Investigators should be aware of these processes when planning to submit an amendment to the IRB. The following are examples of ancillary committee which may need to review an amendment prior to IRB review:

1. Childrens Wisconsin HRPP Local Context Review
2. Clinical and Translational Science Institute (CTSI/TRU)
3. Safety Committee (examples: Radiation Safety)
4. Emergency Medicine Resource Review Committee

IRB Review

1. When an amendment is received via eBridge by the IRB, the HRPP office will review the amendment and attached documents for completeness and determine the type of IRB review the project activities qualify for based upon the risks and proposed changes involved. The IRB reviews amendments under the following categories:
   a. FLEX Review
   b. Expedited Review
   c. Convened Committee Review

2. The IRB will notify investigators of its decision to approve or disapprove the proposed changes to the project as well as any modifications required to secure IRB approval. If the IRB decides to disapprove a modification, it will include in its written notification a statement of the reasons for its decision.
3. If the amendment meets criteria for convened committee review, the PI and project staff are notified of the disposition of the amendment within 5 business days following an IRB Committee meeting.
4. If the amendment meets criteria for expedited review, the PI and project staff are notified of the disposition of the amendment within 5 business days following the IRB reviewer's determination.
5. If the amendment and overall project continues to meets criteria for FLEX review, the PI and project staff are notified of the disposition of the amendment within 5 business days following the HRPP Office's determination.
6. By accessing the project in eBridge, the PI and project personnel will be able to see which Committee will review the modification, the name and contact information for the IRB Coordinator II (C2) responsible for the Committee, and the meeting date at which the protocol will be reviewed, if applicable. The IRB C2 should be contacted for questions related to the amendment.

SMARTFORM UPDATES TO PROJECTS

1. SmartForm updates encompass changes that may be made to the eBridge SmartForm without IRB review or changes which must be reviewed and acknowledge by IRB Staff prior to incorporating the change into the project.

REFERENCES:
21 CFR 56.108(a) (4); 45A, Part 46, Section 103(b) (4) (iii)

SUPPORTING DOCUMENTS:
IRB Form: Agreement of Investigator Responsibilities Form
IRB SOP: Reliance Agreements for Multi-Site Projects

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