In certain circumstances, IRBMED may permit the University of Michigan’s participation in a multi-site study only if U-M–specific protocol modifications are implemented. In order to document these U-M–specific modifications, study teams will complete a U-M Addendum document and submit it via eResearch.

As used here, the term “protocol” refers to a research project as a whole, including all supporting information and documents. The U-M Addendum should capture any modifications or limitations placed on the research project by IRBMED. The U-M Addendum may be utilized for studies undergoing expedited review or review by the convened board.

Site-specific protocol addendum procedures are as follows.

During regulatory review, IRBMED determines that the study protocol or other supporting documentation requires U-M–specific modifications.

IRBMED directs the study team to communicate these U-M–specific modifications to the sponsor. If the study team has secured written approval from the sponsor for the U-M specific modifications, the approval must be uploaded into eResearch.

If the study team has not secured the written approval of from the sponsor for the U-M specific modifications, the study team must work with the regulatory team to determine the likelihood of sponsor approval. This determination will take into consideration whether the modification is a “restriction” or “alteration” of the global protocol.

A “restriction” narrows the scope of the global protocol or limits what aspects of the global protocol will be conducted at U-M. For example: The global protocol permits the enrollment of adults and children. The IRB has restricted enrollment to adults only.

An “alteration” expands the scope of the global protocol or substitutes aspects of the global protocol. For example: The global protocol calls for Test X to be performed on subjects. U-M facilities do not accommodate Test X, but it is understood that Test Y provides equivalent results. The IRB has approved a site specific modification allowing the use of Test Y.

If it seems likely that the sponsor will approve the U-M specific modifications, the regulatory team may issue final approval. Manage Actions Items should be utilized to ensure that the study team uploads the sponsor approval at the time it is received.

If it seems unlikely that the sponsor will approve the U-M specific modifications, the regulatory team must hold the final approval until such time as the sponsor makes a written decision.

Once the sponsor has issued written approval for the modification, the study team will be
provided with the U-M Addendum. The study team should upload the completed document in **Section 5** of the eResearch application. They should also indicate in **Section 1.8** that this project is subject to a U-M Addendum.

IRBMED instructs the study team to make any other necessary changes to the eResearch application and supporting documents to reflect the U-M-specific modifications. Study teams are instructed to use the new eResearch Cross Reference Table to identify other related questions and sections in the eResearch application.

IRBMED regulatory staff review the U-M Addendum, as well as the relevant sections of the eResearch application and modified supporting documents, to ensure that they correctly capture the U-M-specific modifications.

Site-specific protocol addenda are appropriate for only some situations. For example, a U-M Addendum is appropriate in the following scenario:

> The protocol for a multi-site study includes minor subjects ages 16 and 17. IRBMED determines that the researcher may not enroll minors at U-M. The sponsor will allow U-M to exclude minor subjects but will not permit modifications to the multi-site protocol document. Therefore, the study team must complete the U-M Addendum document and make changes to the application and supporting documents—such as deseleting minors as a subject population in Section 9 of the eResearch application and removing references to minor subjects from the consent and assent documents.

On the other hand, a U-M Addendum would be inappropriate in the following scenario:

> The protocol for a multi-site study allows for the use of either Multi Gated Acquisition (or MUGA) Scan or echocardiogram for evaluation of heart function for safety monitoring. The investigator at U-M indicates that all subjects at this site will undergo only echocardiogram monitoring. Since the protocol allows for either method, the decision to use echocardiogram only does not require a U-M Addendum.

Contact the IRB for more information about site-specific protocol addenda.

*Posted: August 20, 2014*