

PLANNED PROTOCOL DEVIATIONS

Clinical Research Policy/Procedure	
Approved: October 2007	Next Review: October 2010

Purpose

To comply with regulatory and good clinical practice requirements regarding changes in research and ensuring that changes in approved research, during the period of IRB approval, are not initiated without appropriate review and approval. To establish consistent documentation of planned changes or variances to approved research.

Responsible Persons

Principal Investigators, Sponsor-Investigators, and Swedish Research Center (SRC) Research Coordination Staff.

Definitions

IRB or Institutional Review Board is a group of individuals designated by an institution to review, to approve the initiation of, and to conduct periodic review of research, in order to assure the protection of the rights, safety and welfare of human subjects participating in the research.

Planned Protocol Deviation is an intentional and deliberate Protocol Deviation initiated by the Principal Investigator. Examples of Planned Protocol Deviations may include request to enroll a subject who fails to meet certain screening criteria (e.g., inclusion/exclusion criteria), and rescheduling of a study visit due to a subject's scheduling conflict.

Principal Investigator is an individual who actually conducts or is personally responsible for the conduct of a research study.

Protocol Deviation is a change or variance in the research from the current IRB-approved protocol.

Sponsor is an individual, company, institution, or other entity that is responsible for the initiation, management, and/or financing of a research study. Additionally includes any agent of the Sponsor.

Sponsor-Investigator is an individual who both initiates and actually conducts or is personally responsible for the conduct of a research study.

Policy

A Principal Investigator is required to conduct a research study in accordance with the current IRB-approved protocol. A Principal Investigator may also commit to the Sponsor, by way of a signed investigator statement/agreement (e.g., FDA Form 1572), to conduct a study in accordance with the current protocol. Thus, protocol deviations, or changes or variances in research from the current IRB-approved protocol, should be avoided. Likewise, a Principal Investigator should not *intentionally* depart from or otherwise initiate a *planned* or *deliberate* change to the protocol unless necessary.

Where a Principal Investigator desires to initiate an intentional and deliberate protocol deviation to an IRB-approved protocol – a Planned Protocol Deviation – and the Planned Protocol Deviation could adversely affect the rights, safety or welfare of the subjects, or, the integrity of the research data, the Principal Investigator may **not** implement the Planned Protocol Deviation unless and until **both** Sponsor **and** the reviewing IRB review and approve the proposed Planned Protocol Deviation. Planned Protocol Deviations that will not, in the Principal Investigator’s judgment, adversely affect the rights, safety or welfare of the subjects or the integrity of the research data require only prior Sponsor approval before implementation.

Where a Principal Investigator is acting in the role of a Sponsor of the research (Sponsor-Investigator), the Sponsor-Investigator is responsible for obtaining written approval from the reviewing IRB before implementing a Planned Protocol Deviation. A Sponsor-Investigator should evaluate whether a formal amendment to the protocol is warranted in the event that Sponsor-Investigator seeks or anticipates requests for multiple, similar Planned Protocol Deviations. Additionally, the Sponsor-Investigator may need to provide notice to and/or obtain prior approval from appropriate regulatory authorities (e.g., FDA) if the proposed Planned Protocol Deviation may affect the safety, rights, or welfare of subjects, the scope of the research study, or the scientific quality of the study.

This policy should **not** be construed to prohibit an unplanned change to the protocol necessary to eliminate an apparent immediate hazard to human subjects (e.g., to protect the life of physical well-being of a subject in an emergency). See Clinical Research Policy/Procedure: UNPLANNED PROTOCOL DEVIATIONS.

Procedure

NOTE: A Planned Protocol Deviation may NOT be implemented until ALL the following steps have been completed in entirety.

1. **Before implementing a Planned Protocol Deviation**, the Principal Investigator must seek prior approval from the Sponsor. Sponsor review and approval of the proposed Planned Protocol Deviation should occur through the mechanism established by the Sponsor. Copies of all communications with Sponsor regarding the proposed Planned Protocol Deviation, including documentation of Sponsor (dis)approval, must be filed into the study regulatory binder. A copy may also be placed in the subject’s chart.
 - If a Sponsor-Investigator of the study, proceed to Step 2.
2. If Sponsor approves a request for a proposed Planned Protocol Deviation, and:
 - a. The Planned Protocol Deviation will **not**, in the Principal Investigator’s judgment, adversely affect the rights, safety or welfare of the subjects, or, the integrity of the research data, the Principal Investigator must prepare a written note-to-file memo

documenting the Principal Investigator's assessment **prior to implementing the Planned Protocol Deviation**.

- The Principal Investigator must personally sign the memorandum. This responsibility may not be routinely delegated by the Principal Investigator.
 - The memo must be filed in the study regulatory binder. A copy may also be placed in the subject's chart.
- b. The Planned Protocol Deviation **could** adversely affect the rights, safety or welfare of the subjects, or, the integrity of the research data, the Principal Investigator must:
- Request IRB approval of the proposed Planned Protocol Deviation by submitting the request to the reviewing IRB.
 - If Swedish IRB is the reviewing IRB, submit the request on a Protocol Deviation Form¹ via iRIS™. If WIRB is the reviewing IRB, complete appropriate WIRB reporting forms (e.g., WIRB Change in Research/Subject Recruitment Submission Form²).
 - The Principal Investigator must personally sign/submit the request for the Planned Protocol Deviation. This responsibility may not be routinely delegated by the Principal Investigator.
 - ➔ **Attach a copy of the documentation of Sponsor's approval with the Planned Protocol Deviation submission to the reviewing IRB.**
 - Ensure that a copy of the completed request submission is reviewed by the appropriate SRC Manager. A copy of the completed request submission should be filed in the study regulatory binder. A copy may also be filed in the subject's chart.
 - ➔ **If a Sponsor-Investigator of the study:**
 - Prepare a written note-to-file memo including supporting documentation assessing whether the proposed Planned Protocol Deviation will impact the safety, rights, or welfare of subjects (e.g., risk/benefit ratio of the study), the scope of the research study (e.g., significant change in study design, addition/deletion of a study monitoring procedure), or the scientific quality of the study (e.g., validity of data). Supporting documentation should include information such as peer-reviewed published literature, data gathered during the research, and written recommendations of other clinical investigators.
 - Ensure that copies of the (i) completed, signed Planned Protocol Deviation submission, and (ii) the Note-to-File Memorandum and supporting documentation are promptly delivered to the Director of SRC and the SRC Research Education & Compliance Officer to facilitate required notification to / approval of appropriate regulatory authorities, as applicable.
 - ➔ The Principal Investigator (Sponsor-Investigator) may implement the Planned Protocol Deviation **only after receipt of written approval** from (1) Sponsor, (2) reviewing IRB, and (3) regulatory authorities (as applicable). Copies of the written approvals must be filed in the study regulatory binder. Copies may also be filed in the subject's chart.

Forms

- ◆ Swedish IRB – Protocol Deviation Form (iRIS)¹
- ◆ WIRB – Change in Research/Subject Recruitment Submission Form²

Supplemental Information

N/A

Expert Consultants

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SRC Research Education & Compliance Officer

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Regulatory Requirements

21 CFR 56.108
21 CFR 312.30, 312.53 and 312.66
21 CFR 812.35, 812.43; 812.100; 812.110; 812.140; and 812.150
45 CFR 46.103
ICH E6 3.3.7 and 4.5

References

WIRB Protocol Deviations & Violations/Unanticipated Problems Reporting System³

Addenda

1. Swedish IRB – Protocol Deviation Form (iRIS)
2. WIRB – Change in Research/Subject Recruitment Submission Form IRB
3. WIRB Protocol Deviations & Violations/Unanticipated Problems Reporting System

pk:Planned Protocol Deviations – ver. 2.1 – FINAL - 101707(10/17/07)

PLANNED PROTOCOL DEVIATIONS

ADDENDUM 1

Swedish IRB – Protocol Deviation Form (iRIS)



Account: Tahiroh Barr, BA
 SMC-First Hill -
 Department: Swedish Institutional
 Review Office
 Navigation: Home > system form
 list > system_form

Home Logout Help

System Form Designer - Test Form

Back

Return To Form

SWEDISH MEDICAL CENTER
 747 Broadway, Seattle WA 98122

PROTOCOL DEVIATION FORM

STUDY INFORMATION

DEFINITIONS

Planned Protocol Deviation - a *premeditated* variance from the approved research activities. IRB approval is required deviation could adversely affect the rights, safety or welfare of the subjects, or, the integrity of the research data.
Unplanned Protocol Deviation - an *unintended or emergent* variance from the approved research activities.

IR Number:

Protocol Number:

Protocol Title:

Principal Investigator:

Co-Investigator(s):

Sub-Investigator(s):

Study Coordinator(s):

Current IRB Approval Dates:

Initial Approval Date:

Expiration Date:

Study Drug:

[Click here to add any Study Drug/Biologic/Chemical agents.](#)

No Drugs have been associated.

Study Device:

[Click here to add any Study Devices.](#)

No Devices have been associated.

DEVIATION INFORMATION

* Please indicate if the Protocol Deviation is **PLANNED** or **UNPLANNED**:

- Planned
 Unplanned

*** Select the category of the Protocol Deviation:**

- Subject Eligibility Criteria
- Out-of- Window study visit or procedure
- Informed consent / assent
- Medication error / non-compliance
- Incorrect therapy administered
- Required protocol procedure not completed or incorrectly performed
- Variation in use of study drug / device / test article from protocol requirements
- Study procedure administered by unapproved personnel
- Loss or corruption of data or forms
- Other - please explain

*** Subject(s) Initials or Study ID #:***** Describe the deviation:***** Date of protocol deviation:** 

PLANNED PROTOCOL DEVIATIONS

*** Will the PLANNED protocol deviation adversely affect the rights, safety, or welfare of the subject(s)?**

Yes No

*** Will the PLANNED protocol deviation adversely affect the integrity of the research data?**

Yes No

*** Provide an explanation of why the deviation is being requested:***** Was approval received from the sponsor?**

Yes No

If no, please explain:

If yes, attach documentation of Sponsor approval at the end of this form.

UNPLANNED PROTOCOL DEVIATIONS

* Was the UNPLANNED protocol deviation initiated to eliminate an apparent immediate hazard to the subject?

Yes No

* Has the UNPLANNED protocol deviation adversely affected the rights, safety, or welfare of the study subject(s)?

Yes No

If yes, please explain:

* Has the deviation damaged the scientific integrity of the data collected for the study?

Yes No

If yes, please explain:

If you responded **YES** to either of the above two questions, provide an explanation about why the deviation occurred recurrence of the deviation in the future.

* Has this deviation been reported to the sponsor?

Yes No

If yes, provide the date the report was sent to the sponsor:



If no, please explain:

* Has an acknowledgement been received from the sponsor regarding this event?

Yes No

ATTACH DOCUMENTS & SUBMIT

OTHER STUDY DOCUMENTS: Click on the button below to attach any applicable documents (e.g., sponsor approval)

 [Click here to attach any study document.](#)

No electronic documents have been associated.

PLANNED PROTOCOL DEVIATIONS

ADDENDUM 2

**WIRB – Change in Research/Subject Recruitment Submission Form
IRB**



Change in Research / Subject Recruitment Submission Form

1.	Sponsor Name:	
2.	Sponsor Protocol Number:	WIRB Protocol Number:
3.	Principal Investigator*:	

*If you are submitting on behalf of multiple investigators, please attach a list of the investigators.

Please list each item for which you are seeking Board review and approval. The summary below replaces the need for a cover letter. If your change request requires more than the space provided, please attach a separate page.

4. Protocol Change (Amendment, Administrative Change, etc.):
*Please submit a **signed copy** of the protocol amendment, revision or administrative letter, a **summary of changes and rationale** for the change.*
- Planned Protocol Deviation:
*Outline details in Comments area below. **Planned protocol deviations** that may adversely affect the rights, safety or welfare of subjects or the integrity of the research data should be submitted to WIRB for review and approval **prior to implementation** except where necessary to eliminate apparent immediate hazards to the human subjects.*
- Consent Form Modifications:
*Please submit a **copy of the most recent WIRB approved consent form with the requested changes clearly marked on the form and rationale for the change.** Address changes should be accompanied by an updated 1572 (if applicable).*
- Are you requesting the addition of one or more sites? Yes* No
If yes, **complete the "Change in Research – Additional Site Form" at the end of this document.*
- New or Updated Recruitment materials:
- Have any of these recruitment materials been previously approved by WIRB? Yes* No
**If yes, please attach a copy of the previously-approved item(s), even if they are from a different protocol.*
 - Public Service Announcements: announcer-read (verbatim) or taped
 - Are you submitting any recruitment materials that **reference** a web site? Yes* No
If yes, you must attach a **hard copy of the recruitment sections of the web site for WIRB review.*
 - Are you submitting any written or verbal screening materials to screen subjects prior to enrollment in the research (such as telephone call scripts, written or web-based questionnaires or pre-screening forms)? Yes* No
If Yes, please **describe the screening plan on the Screening Procedures Information Form found at www.wirb.com. WIRB reviews screening materials in the same fashion as consent documents. WIRB's requirements for screening scripts are listed at the bottom of the Screening Procedures Information Form.*
- Other (specify):

Comments:

5. Translations:

- Translated Consent Form or other subject material is attached for review (*contact the WIRB Translations department for requirements*), or
- I request WIRB provide a translation:
Item(s): _____
Language(s): _____

The consent forms and other applicable subject materials must be in a language easily understood by the subject and **all translations must be approved by WIRB prior to use**. Provide information about who will pay the cost of the requested WIRB translation services on page 3.

Comments:

(continued on next page)

PLANNED PROTOCOL DEVIATIONS

ADDENDUM 3

**WIRB Protocol Deviations & Violations/Unanticipated Problems
Reporting System**

WIRB Protocol Deviations & Violations / Unanticipated Problems Reporting System

Federal Regulation 21CFR 56.108(b)(1) requires the IRB to “follow written procedures for ensuring prompt reporting to the IRB...of...Any unanticipated problems involving risks to human subjects or others...”

WIRB provides two reporting forms:

1. Use the attached Protocol Deviations & Violations/Unanticipated Problems Reporting Form to report the following:

- **Unanticipated problems** which in the opinion of the investigator may adversely affect the rights, safety or welfare of the subjects, or which significantly impact the integrity of research data. Unanticipated problems are issues that do not fit the usual definition of an Adverse Event, but which may, in the opinion of the investigator, involve risk to the subject, affect others in the research study, or significantly impact the integrity of research data. For example, report occurrences of breaches of confidentiality, destruction of study records, or unaccounted-for study drug.
- **Unplanned protocol deviations/violations** that have already occurred, that may adversely affect the rights, safety or welfare of subjects or the integrity of the research data, **AND** for which you did not seek WIRB pre-approval. Sites must utilize the attached WIRB report form or a form which contains all the same information required in the WIRB report form.

Report occurrences within 10 days of becoming aware of them.

Planned protocol deviations that may adversely affect the rights, safety or welfare of subjects or the integrity of the research data should be submitted to WIRB for review and approval **prior to implementation** except where necessary to eliminate apparent immediate hazards to the human subjects [(DHHS 45 CFR § 46.103(b)(4); (FDA 21 CFR § 56.108(a)(4); ICH 3.3.7)]. Use the **WIRB CIR/Subject Recruitment Submission Form** to request approval of a *planned* protocol deviation prior to implementation. (Deviations necessary to eliminate apparent immediate hazards to the human subjects should be reported within 10 days on the attached **Protocol Deviations & Violations/Unanticipated Problems Reporting Form**.)

2. Use the attached Protocol Deviations/Violations Log in the following circumstances:

If the sponsor or institution requires reporting to the IRB of deviations and violations beyond those outlined above, use the Protocol Deviations/Violations Log. Record on the log only deviations and violations that DO NOT adversely affect the rights, safety or welfare of subjects or the integrity of the research data. Sites may hold their logs until the next WIRB Continuing Review Report Form (CRRF) is due and then forward the log with the CRRF. If the rights, safety or welfare of subjects or the integrity of the research data are affected, do not use the log, use the Protocol Deviations & Violations/Unanticipated Problems Reporting Form named above.

General notes:

- The reporting requirements for WIRB may differ from the reporting requirements for the sponsor.
- Please note that unnecessarily reporting events or problems that do not potentially affect the rights, welfare or safety of subjects in the study may impair the Board's ability to review and respond in a timely manner to actual situations where subject rights, welfare or safety are threatened.

The forms are also available on our web site at www.wirb.com.



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 3535 SEVENTH AVENUE, SW • OLYMPIA, WA 98502-5010
 P.O. BOX 12029 • OLYMPIA, WA 98508-2029
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Protocol Deviations/Violations & Unanticipated Problems Reporting Form

(Use this form to report unanticipated problems that occur at your site and protocol deviations/violations that adversely affect the rights, safety or welfare of subjects, or significantly impact the integrity of research data)

Principal Investigator Name: _____

Institution Name (if applicable): _____

Sponsor: _____

Sponsor Protocol No.: _____ WIRB Protocol No.: _____

Study Drug/Device: _____

Subject ID: _____
(Initials/Number)

Describe the deviation/violation or unanticipated problem (*pre-planned deviations must be submitted to WIRB for approval prior to implementation*): **Date of Occurrence:**

Explain the reason for the deviation/violation or unanticipated problem:

Describe what action you have taken to prevent recurrence:

 Printed or Typed Name of Person Completing This Form

 Investigator Signature

 Phone number

 Fax number

 Date