How to Submit an IRB Modification for Studies Moved Online Due to COVID-19

Teachers College, Columbia University

Changes to Protocols Due to COVID-19

Ethical principles of research and federal regulations for the protection of human research participants require an acceptable risk/benefit ratio.

Given the current COVID-19 coronavirus outbreak and the real or perceived risk of exposure, the risk/benefit ratio for research participation must be reassessed for each IRB protocol.

While pausing studies to minimize the risks of transmission of COVID-19 will often outweigh the harms to research programs, TC IRB will also consider possible harms to subjects should a study be paused or ceased.

Changes to Protocols Due to COVID-19

For protocols affected by COVID-19, researchers have several options available to them including:

- Self-Determined Pause: Researchers can choose to pause study activities at their discretion. Pausing researcher work, does not require an IRB protocol submission.
- 2. <u>Study Activities Can be Moved Online</u>: In the event that all face-to-face study activities can be moved to online methods (e.g., conducting participant interviews via Skype or Zoom), PIs must submit a modification (details included on the next slide).
- 3. **Study Activities Cannot Be Moved Online:** In the event that online substitutes for face-to-face study activities are not practical or possible (e.g., administering of a drug trial), PIs can submit a modification with justification for continuing study activities in person.

- 4. Some Methods Can Be Moved Online While Others Cannot: In some cases, some study activities in a protocol may be transferred online, while other activities in the same protocol are not substitutable. PIs must submit a modification designating a plan of action for all activities.
- 5. TC IRB Determination: Protocols are regularly reviewed by TC IRB on a case-by-case basis. For those PIs who do not self-select to change their study activities to accommodate evolving COVID-19 conditions, TC IRB reserves the right to assess study activities for the protection participants. In these circumstances, TC IRB will contact the PI's directly about next steps.

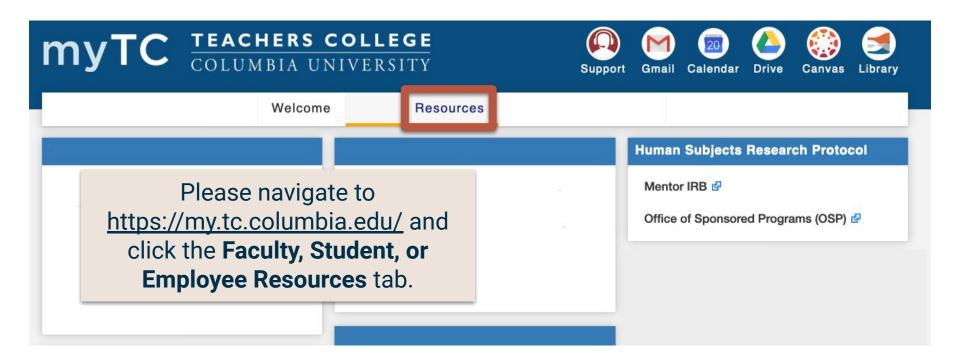
"COVID-19-specific" modification guides are available at: https://www.tc.columbia.edu/institutional-review-board/updates/ Moving Face-to-Face **Study Activities** to Online Methods in Response to COVID-19

Due to the spread of COVID-19, some research sites may have been shut down. In some cases, researchers may be able to move all face-to-face contact with research subjects online (e.g. Zoom or Skype interview). In these cases, researchers should submit a modification through TC Mentor IRB. **If you are making these study changes due to COVID-19, submit a "COVID-19-specific" modification.**

Once the "COVID-19-specific" modification has been submitted, researchers can immediately begin online study activities. TC IRB will review all modifications and send out acknowledgement letters. However, researchers do not need to wait for an acknowledgement letter before beginning online study activities. Researchers can begin online study activities before receiving this letter.

For all typical "non-COVID-19-specific" modifications, researchers must wait for approval from TC IRB before beginning study activities. The link below will guide you to the typical modification submission process (i.e., "non-COVID-19-specific") https://www.tc.columbia.edu/institutional-review-board/how-to-submit/mod ification/

Navigating to Your Protocol



Navigate to the **Mentor IRB** button on the right hand side of the screen. Mentor IRB should open in a new page.

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		Welcome	Student Resources	Employee Resources	Support Resources					
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View eBill Make a Payment			Degree Audit							
Enroll/Manage eRefund		TC Gmail Terms of Agreer	nent			Track your progress Degre	towards your degre ee Audit	el		

Navigating to Your Protocol

Navigate to **My Protocols** found on the left hand sidebar of TC Mentor IRB.

Choose the study you would like to review.

Info Page	Create Net	w Protocol				
Documentation	My Prote	ocols				
My Protocols		Next Meeting: 07/17/2019 r Submission: 07/07/2019				
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Research	IRB # -	Title		PI	Approved	A.R. Du
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Reviewer		Evaluating Evaluating			6/14	
PI	1.1	Evaluating			3/15	06/24/19
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		Promoting Science			9/14	
Meetings	17 da 1	Math Learning and How to Do Math	Pr		7/14	03/05/2
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		How Students Learn to Solve Proble	im		1/16	
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		Mistake Recovery Instruction: Integ.			1/16	
		Education			8/16	
		Assessing the acceptability and fea.			4/16	05/09/2
	1.1	Mathematics and Reading			3/16	06/03/2
	1.1	Scaling up			2/17	02/15/20
	1.1	Decreasing			9/17	03/14/2
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	1.517	School Climate: Teachers, Students,			07/23/18	

To view modifications, scroll down to the bottom of your protocol and you will see a **Modification** tab. Once in the tab, you can **Create a New Modification.**

When submitting a protocol, please be sure to follow the submission directions.

Modifications , tverse Events Protocol Deviations

Covid-19 Response

Pausing a Study:

Unless research subjects would be placed at risk by pausing/discontinuing your study temporarily, you may pause work on your study without filing any Modification to your IRB approved study.

Moving Research Methods Online:

If it is feasible to conduct some or all of your research methods online and/or your study site(s) have been closed, please submit a Modification to your protocol in Mentor IRB and select the Modification type:

"Research Site Closed for Covid-19 - Moving to Online Methods (no further approval needed)"

Please note that you need not wait upon the IRB to approve this modification to move your methods online.

Research Methods Cannot Be Moved Online or Paused:

It is necessary to continue this research study in person with the research subjects due to the nature of the study procedures and/or possible risks to subjects if the study were to be paused. In this case, please submit a Modification to your protocol in Mentor IRB and select the Modification type:

"My Study Methods Cannot be Moved Online for Covid-19 and Study Cannot be Paused"

You will be prompted with a short form to detail the reasons for continuing the study in person and the IRB will expedite review of your modification.

maroon page icon: (■) to the left of the file type label. Also, if you have multiple changes to submit, please consolidate them into one Modification memo and one Modification record. Please do not create multiple Modification records.

Create New Modification

For "COVID-19-specific" modifications that are moving all face-to-face activities online, please choose the first checkbox, **Moving to Online Methods in Response to Covid-19.** Then click **Create Modification.**

10/09/2019 E 20-052_Principal Letter.docx (Recruitment Materials)

⊠ Cancel

Create New Modification

Create New Modification

This form will create a new Modification. You will be prompted after the Modification record is created to provide additional information and/or file uploads.

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to upload additional documents. To upload additional files, click on the context menu (the small maroon page icon: III) to the left of the file type label. Also, if you have multiple changes to submit, please consolidate them into one Modification memo and one Modification record. Please do not create multiple Modification records.

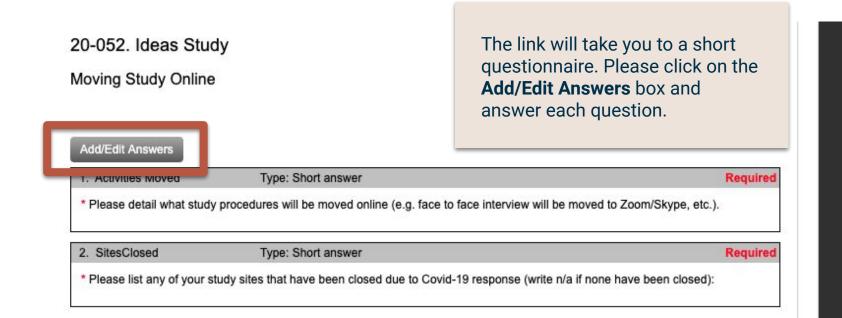
Protocol Title Ideas Study

Amendment Type D Moving to Online Methods in Response to Covid-19

- My Study Methods Cannot be Moved Online for Covid-19
- Minor Change (personnel, small changes to procedures, etc)
- Significant Change (that may impact risks)



	Status	Туре	Status Date
9 03/10/2020	New - Submitted: 03/10/2020	Moving to Online Methods in Response to Covid-19 further approval needed)	(no
Moving Study Online C			Print Messages (0)
 Modification M Required File Revised Applic Revised Applic Revised Applic Revised Conse 	cation - Final cation - Track Changes	 Methods in Response Pls must fill out the objective 	you see the latest d, "Moving to Online



Once you are satisfied with your answers, click **Save Answer**.

You will be taken to the screen below. Click **Return to Protocol Page.**

1. Activities Moved	Type: Short answer	Required	
Answer is Required			
	procedures will be moved online (e.g. face to face interview will be moved to Zoom/Skype, etc.).		
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Face to face interviews	s will be moved to Zoom conferences.		
body 2. SitesClosed	Type: Short answer	Required	
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Moving

	Status	Туре	Status Date
9 03/10/2020 New - Submitted: 03/10/2020	Moving to Online Methods in Response to Covid-19 (no further approval needed)		
			Print Messages (

Moving Study Online Questions

Additional Modification Documents

Iodification Memo Required File

- Revised Application Final
- Revised Application Track Changes
- Revised Consent Form Final
- Revised Consent Form Track Changes

- You will be taken back to the Modifications tab.
- Scroll down until you see the latest modification titled, "Moving to Online Methods in Response to Covid-19."
- All modifications must be submitted with a Modification Memo. Click the red notebook icon to Upload a Memo.
- The Modification Memo Template can be downloaded from Mentor IRB/Documentation/ 18_Modification Memo Template

<u>Moving Face-to-Face Study Activities to Online Methods in Response to COVID-19</u>: Once you have uploaded a "COVID-19-Specific" Modification, you may begin online study activities. **You do not have to wait to receive an acknowledgement letter before beginning online study activities.**

If you receive a Request for Revisions from an IRB reviewer, submit the revisions (along with the Request for Revisions Memo Template) to the current Modification record, using the Upload option on the appropriate file types listed on the Modification. You will find the Upload option on the **context menu** to the immediate left of each file type title. **Please check the "Submit Revisions for Review" checkbox** on the Modification record to submit your revisions. Email <u>IRB@tc.edu</u> when the response to revisions is submitted as the reviewer will not be notified when your response has been uploaded.

For Typical Modifications (not related to Covid-19)

For all **typical** "non-COVID-19-specific" modifications, researchers must wait for approval from TC IRB before beginning study activities. The link below will guide you to the typical modification submission process (i.e., "non-COVID-19-specific") https://www.tc.columbia.edu/institutional-review-board/how-to-submit/modification/

Responsibilities of the Primary Investigator

As the PI of record for an Teachers College, IRB protocol, you are required to:

- Use current, up-to-date IRB approved documents
- Ensure all study staff and their CITI certifications are on record with the IRB
- Notify the IRB of any changes or modifications to your study procedures
- Alert the IRB of any adverse events You are also required to respond if the IRB communicates with you directly about any aspect of your protocol.

Failure to adhere to your responsibilities as a study PI can result in action by the IRB up to and including suspension of your approval and cessation of your research.

If you have questions or concerns about the rights of a research subject, you should contact the Institutional Review Board (IRB) (the human research ethics committee) at 212-678-4105 or email IRB@tc.edu or you can write to the IRB at Teachers College, Columbia University, 525 W. 120th Street, New York, NY 10027, Box 151. The IRB is the committee that oversees human research protection for Teachers College, Columbia University.