From: OC GCP Questions
To: [redacted]
Subject: RE: GCP question on ICF Amendments
Date: Monday, February 03, 2014 12:46:00 PM

Dear ώwŜŘł·ŎώŜŘϐ-

Thank you for your question. Have you consulted your IRB with your question? The IRB is responsible for approving any changes to the ICF, determining what the revised ICF includes, and advising whether any subjects need to sign the revised ICF (e.g., all current subjects and new subjects, or just new subjects).

As you know, the FDA regulations regarding the additional elements of informed consent at 21 CFR 50.25(b)(5) require that, when appropriate, the following information be provided to each subject in the consent form - A statement that significant new finding developed during the course of the research which may relate to the subject's willingness to continue to participation will be provided to the subject.

FDA has guidance titled, "Institutional Review Boards Frequently Asked Questions - Information Sheet" found at http://www.fda.gov/RegulatoryInformation/Guidances/ucm126420.htm. FAQ #45 states:

> 45. When should study subjects be informed of changes to the study?
>
> Protocol amendments must receive IRB review and approval before they are implemented, unless an immediate change is necessary to eliminate an apparent hazard to the subjects (21 CFR 56.108(a)(4)). Those subjects who are presently enrolled and actively participating in the study should be informed of the change if it might relate to the subjects' willingness to continue their participation in the study (21 CFR 50.25(b)(5)). FDA does not require reconsenting of subjects that have completed their active participation in the study, or of subjects who are still actively participating when the change will not affect their participation, for example when the change will be implemented only for subsequently enrolled subjects.

If a revised ICF is approved by the IRB, and the IRB determines that current subjects need to review and sign a revised ICF, then that revised ICF should be complete and include the optional components and checkboxes. It is important to appreciate that the information that resulted in the need for a revised ICF may influence a subject's decision not only to continue to participate in the study, but may also affect the subject's continued desire to agree to the optional components of the study. If a revised informed consent form is approved by the IRB, simply including a statement that the optional components will be conducted per their original consent may deprive subjects the opportunity to make fully informed decisions on whether or not they would like to continue to participate in the optional components of the study based on the information in the revised consent form.

You may wish to discuss your question with your IRB as they will be familiar with the nature of the changes to the ICF, the reason(s) for the changes, and may determine whether a fully revised ICF should be issued and signed by all subjects, or whether an addendum to the ICF may suffice to summarize the changes to the study.

I hope this information is useful. If you need further information and/or have additional questions, please feel free to contact us at the official GCP mailbox, gcp.questions@fda.hhs.gov. You may also find it useful to access the set of redacted GCP e-mails found at http://www.fda.gov/ScienceResearch/SpecialTopics/RunningClinicalTrials/RepliestoInquiriestoFDAonGoodClinicalPractice/default.htm since we find that many questions and concerns are repeated over time.

Best Regards,
Janet
Janet Donnelly, RAC, CIP
Policy Analyst, Office of Good Clinical Practice
Office of Special Medical Programs, Food and Drug Administration

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From: [Redacted]
Sent: Wednesday, January 29, 2014 6:35 PM
To: OC GCP Questions
Subject: GCP question on ICF Amendments

Dear FDA GCP Representative,

I would be grateful for your expert GCP guidance on the following scenario:

An informed consent form (ICF) for a clinical trial contains optional components. Subjects have indicated their willingness to participate in the optional components by means of Yes/No checkboxes. The ICF subsequently undergoes amendment for changes to the other (non-optional) sections of the ICF. The optional sections are unaffected by the changes. In such a case, should the amendment again include the Yes/No checkboxes for the optional components for the subjects to fill out, or can the ICF state that the optional components will be conducted per their original consent.

It would be helpful if you could provide supporting references to your response.

Thank you.

Best regards,

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