

University of Kentucky Office of Research Integrity and Institutional Review Board Standard Operating Procedures			
<b>SOP #4-4 Revision #6</b>	<b>TITLE: Study Closure</b>		<b>Page 1 of 7</b>
Approved By: ORI Director	Signature	Date	Date First Effective: 06-30-05
Approved By: Nonmedical IRB Chair	Signature	Date	
Approved By: Medical IRB Chair	Signature	Date	Revision Date: 08-19-09

### **OBJECTIVE**

To describe the policies and procedures followed to close a study

### **GENERAL DESCRIPTION**

The principal investigator (PI) and/or the Institutional Review Board (IRB) may close approved protocols under certain circumstances. The PI is responsible for promptly closing out an IRB approved study if any of the following conditions exist:

1. All research/clinical investigation activities including data analysis and reporting are complete;
2. The PI never initiated the study;
3. Subject accrual is finished, all data collection is complete and the only remaining activity is analysis of the data, the data are de-identified, and there are no identifying links or codes to the de-identified data;
4. The PI plans to leave the University and intends to continue the research activities at another institution;
5. The study has been open for a period of three or more years and the PI has enrolled no subjects in the study.

The PI submits the request to close out IRB approval in writing to the Office of Research Integrity (ORI). When closing out a study, the PI completes a final review report unless: 1) he/she never initiated the study or; 2) the study received initial/continuation review within the last six months and the PI has enrolled no subjects in the last six months.

The PI cannot close out an active IRB approval if:

1. He/she is still following subjects or;
2. He/she is analyzing identifiable data (including data with codes or links to identifiers).

<b>University of Kentucky Office of Research Integrity and Institutional Review Board Standard Operating Procedures</b>		
<b>SOP #4-4 Revision #6</b>	<b>TITLE: Study Closure</b>	<b>Page 2 of 7</b>

The IRB may notify a PI that IRB approval or active IRB status has expired or that the IRB has inactivated IRB approval due to non-response from the PI to IRB requests. The IRB may suspend or terminate IRB approval. (See the Termination or Suspension of Research by the IRB SOP.)

If a study has been open for a period of three or more years and the PI has not enrolled subjects in the study, the IRB requires study closure unless there are extenuating circumstances for keeping the project open (e.g., the study is about a rarely seen condition).

Procedures for closing a study fall into five categories:

- Final review (FR);
- Non-response from PI to IRB requests for revisions (a vote of 2, 3, or 4);
- Closure due to non-enrollment;
- Lapse of approval due to non-response to requests for continuation or final review (See Continuation Review SOP);
- PI initiated withdrawal.

Regardless of the category for study closure, the expiration date for IRB approval falls on the first day after the approval period end date.

### **RESPONSIBILITY**

Execution of SOP: Principal Investigator (PI)/Study Personnel, ORI Staff, IRB Chair, IRB Vice Chair, IRB Members

### **PROCEDURES**

#### *Final Review*

1. When a study nears its projected end date, ORI staff generate a request for final review through the ORI computerized tracking system. The format of the final review is similar to that of the format for the continuation review. (See Continuation Review SOP.) The PI completes and signs the final review report and returns it to the ORI. The Final Review Report Form specifies additional materials to submit.
2. Regardless of initial review type (full or expedited), protocols undergo expedited review procedures for final review, unless the IRB reviewer determines the circumstances surrounding the request for closure require full review. ORI staff screen the final review report and informed consent/assent forms, and an IRB Vice Chair or designee conducts the review.
3. Review outcomes may include:
  - Request revisions and/or additional information;

<b>University of Kentucky Office of Research Integrity and Institutional Review Board Standard Operating Procedures</b>		
<b>SOP #4-4 Revision #6</b>	<b>TITLE: Study Closure</b>	<b>Page 3 of 7</b>

- Full review at a convened meeting;
  - Request that the PI attend the convened IRB meeting at which the protocol is scheduled for full review;
  - Closure at the end of the current approval period.
4. Once the IRB issues approval for closure, ORI staff code the protocol records as terminated in the ORI database. ORI staff remove the protocol files from the active files and store them alphabetically by PI last name and further label and organize them by the month and year of the last review event in the event viewer section of the ORI database. ORI staff store the protocol files for at least six years from closure date.

*Closure Due to Non-Response*

1. If, at initial review, the PI fails to respond to the IRB's request for additional information/ revisions within a specified period of time (e.g., approximately three months), the ORI computerized tracking system generates a letter, which ORI staff send to the PI reminding him/her that the IRB has never approved the study and had requested revisions to the protocol.
2. If the ORI has not received a response, the computerized tracking system generates a new letter approximately two weeks after generation of the original letter informing the PI that the IRB requires a new protocol submission if the PI wants consideration for IRB approval again.
3. If the PI fails to return the Continuation or Final Review Report Form or fails to submit requested information, ORI staff send him/her a notification letter ending IRB approval. (See the Continuation Review SOP.)

*Closure Due to Non-Enrollment*

1. If, at continuation review, the PI reports to the IRB that he/she has never enrolled subjects into the study and the study has been open for a period of three or more years, the IRB requests that the PI submit a withdrawal request memorandum. ORI staff prepare a withdrawal notification letter and send it to the PI.
2. If there are extenuating circumstances for keeping a study open, the PI files a response to the IRB to justify that the study be kept open along with the continuation review report form. If the IRB agrees that there are extenuating circumstances, ORI staff send the PI a notification letter of continued IRB approval, conditional upon criteria for IRB approval being met. (See the Continuation Review SOP.)

<b>University of Kentucky Office of Research Integrity and Institutional Review Board Standard Operating Procedures</b>		
<b>SOP #4-4 Revision #6</b>	<b>TITLE: Study Closure</b>	<b>Page 4 of 7</b>

3. If the IRB determines that the extenuating circumstances do not justify leaving the study open, ORI staff process the materials submitted for closure. ORI staff prepare a withdrawal notification letter and send it to the PI.

*PI Initiated Withdrawal*

1. During an approval period, the PI may request study closure. Upon receipt of a written request, the ORI determines, based on the date of the study's last review and research activity to date, whether a final review report form should be completed. A PI may also indicate at the time of continuation review that a study should be closed.
2. If all research activities are complete, the PI may request closure in writing providing the following information:
  - Request for inactivation of IRB approval;
  - Confirmation that the PI has enrolled no subjects since the last review; and
  - Confirmation that data analysis is complete.The PI completes a final report form unless the study received initial/continuation review within the last six months and the PI has enrolled no subjects since that review.
3. If a study is open, subject accrual is finished, and collected all data, data analysis is the only activity remaining, data are de-identified, and there are no subject identifying codes or links to the de-identified data, the PI may request closure in writing providing the following information:
  - Request for inactivation of IRB approval;
  - Confirmation that all subjects have been enrolled;
  - Data collection is complete;
  - Confirmation that only data analysis, as approved in the protocol, of already collected data remains;
  - Data are de-identified (an explanation of what this means); and
  - There are no subject identifying codes or links to the de-identified data.
4. If the PI has never enrolled subjects in a study, regardless of when the last review occurred, the PI may request closure in writing providing the following information:
  - a. Request for inactivation of IRB approval;
  - b. Confirmation that no subjects were ever enrolled.
5. Sometimes it is unclear with the original closure request whether the PI has enrolled subjects. In such cases, ORI staff may generate a Final Review Report Form and send it to the PI for completion in order to appropriately close the study.

<b>University of Kentucky Office of Research Integrity and Institutional Review Board Standard Operating Procedures</b>		
<b>SOP #4-4 Revision #6</b>	<b>TITLE: Study Closure</b>	<b>Page 5 of 7</b>

6. If the study has not received initial/continuation review within the last six months and the PI has enrolled subjects since the last review, ORI staff generate a Final Review Report Form and send it to the PI for completion in order to appropriately close the study.
7. The IRB Vice Chair, expedited reviewer, or other designated IRB member reviews and signs closure/withdrawal notices/final reviews. ORI staff prepare a withdrawal notification letter and send it to the PI after processing the request.
8. When a PI leaves UK, he/she should close out his/her protocol(s) or notify the ORI in writing to transfer the protocol(s) to another PI who will take responsibility for the research. This transfer may require a modification request and/or further IRB review and approval.
9. If applicable, when a PI transfers a protocol, the new PI submits appropriate changes to consent forms, advertisements, etc. to the IRB for review. Additionally, the new PI submits a completed Signature Assurance Sheet.

*Reactivating IRB Approval*

1. A PI may re-initiate research previously inactivated by the IRB by following the procedures for initial full review, expedited initial review, or continuing review, as determined by the IRB Chair, Vice Chair, IRB members, or ORI staff.

**REFERENCES**

Not applicable

## Study Closure Guidance

Final Review Report Form should be completed by PI when:



AND/OR



### General Procedural and Coding Sequence

FR60

FR61 (Process expedited) Note: change level of risk in Info Viewer to "minimal..."

FR10

If manually generating a Final Review Report Form (FR60):

In the comment field of the FR60 code, enter "Prompted by PI's request for closure".

Use the cover letter [J:\Master Internal Documents\Closures\FRcover-letter.doc]

and print on letterhead.

Make a copy of the cover letter and insert into pulled file.

Send original cover letter with the FR Report Form to the PI.

Use manual tracking system to follow-up (ORI system will automatically generate

a follow-up FR60 which you may want to intercept depending on the circumstances).

Process FR materials like expedited CR.

When FR process complete (approved for closure by reviewer):

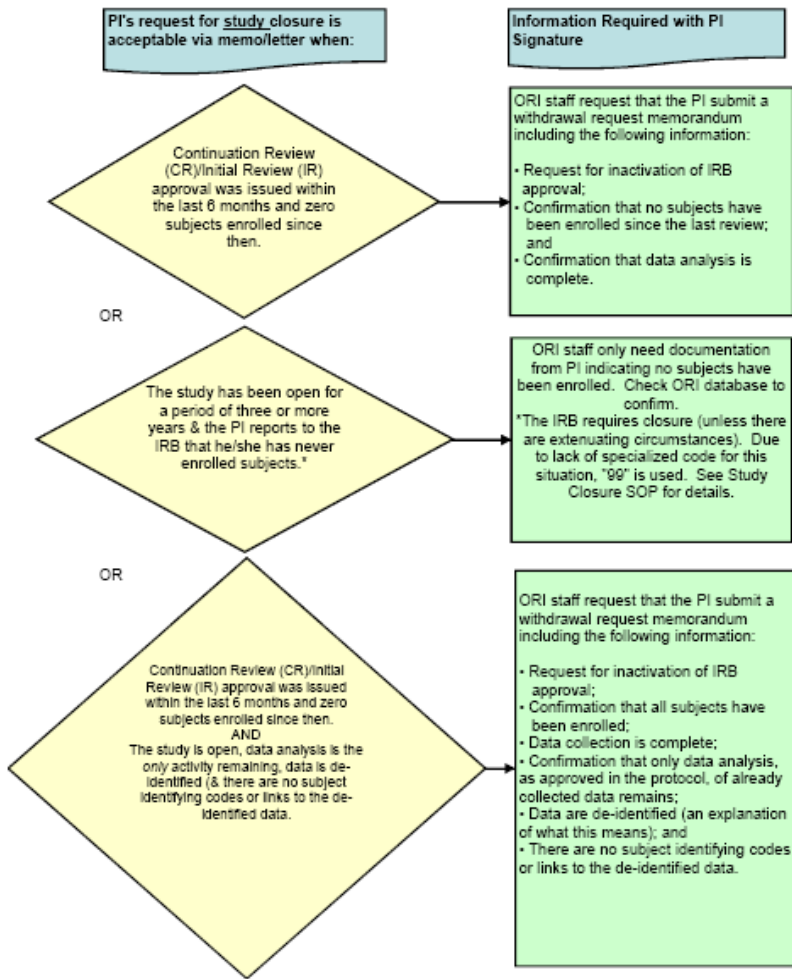
Label file tab with closure code and FR61 event date.

File goes in "closed files" area.

\* If the study does not require Final Review, go to next page for circumstances under which a memo from the PI is acceptable for closure.

May-07

J:\Master Internal Documents\Closures\Closure-Flow-chart.xls



**General Procedural and Coding Sequence**

CR99, FR99, IR99 = PI request to withdraw IRB approval

Enter "99" code using date request was received (see date stamp). Whether to enter CR99, FR99, or IR99 will likely be determined by preceding code in database. For example:

CR60 (CR request) --> CR99  
 FR60 (FR request) --> FR99  
 CR10/29/24 (CR approval) --> CR99  
 CR62 (ORI requests additional info/materials) --> CR99  
 CR20/30/40 (IRB requests additional info/materials)-->CR99  
 IR00 (PI submitted proposal) --> IR99  
 IR20/30/40 (IRB requests additional info/materials)--> IR99  
 IR91 (notice to PI that requested info/materials not yet received) --> IR99  
 IR10/29/24 (IR approval) --> IR99

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- After generating "99" letter, make a copy of it (and the PI's memo if there is not already a copy).
- Send to reviewer the original PI memo and original "99" letter (may use "sign here" note on "99" letter to prompt reviewer to sign).
- Retain copy of PI memo and "99" letter until original set is returned by reviewer.
- When original set returned by reviewer, make a copy of signed "99" letter.
- Send original signed "99" letter to PI.
- Pull file and insert copy of signed "99" letter and original PI memo.
- Label file tab with closure code and "99" event date.
- File goes in "closed files".

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Sometimes it is unclear by the original closure request whether all criteria for closure apply. In such cases, ORI staff attempt to contact the PI for clarification. When attempts to communicate with the PI have been unsuccessful, and a determination can not be made regarding whether a 99 or FR60 code is appropriate, the default is to initiate the FR60 process manually. Use the FR cover letter template: J:\Master Internal Documents\Closures\FRCover-letter.doc