

**Joint Guidance from UMCCTS & UMMS IRB  
COVID-19 Guidance for Investigators  
Version 4: March 20, 2020**

UMMS is implementing aggressive measures to mitigate the spread of COVID-19. This document provides guidance to investigators regarding the conduct of human subjects research during this period.

Items updated TODAY are flagged by yellow highlighting. New items in Version 4, March 20, 2020: Added link to FDA guidance for clinical trials, link to OSP page, link to memo to share with sponsors, and information related to continuing reviews and emergency use

For IRB-related questions: [allison.blodgett@umassmed.edu](mailto:allison.blodgett@umassmed.edu) or [irb@umassmed.edu](mailto:irb@umassmed.edu)

For OCR-related questions: [danielle.howard@umassmed.edu](mailto:danielle.howard@umassmed.edu) or [clinicalresearch@umassmed.edu](mailto:clinicalresearch@umassmed.edu)

Relevant Links
<a href="https://umassmed.edu/coronavirus">https://umassmed.edu/coronavirus</a>
<a href="https://www.umassmemorialhealthcare.org/umass-memorial-health-care/patients-visitors/coronavirus-covid-19-news-and-information">https://www.umassmemorialhealthcare.org/umass-memorial-health-care/patients-visitors/coronavirus-covid-19-news-and-information</a>
<a href="https://www.umassmed.edu/ccts/irb/">https://www.umassmed.edu/ccts/irb/</a>
<a href="https://www.umassmed.edu/ccts/covid-19/">https://www.umassmed.edu/ccts/covid-19/</a>
<a href="https://www.umassmed.edu/research/sponsored-programs/covid-19-resources-for-researchers/">https://www.umassmed.edu/research/sponsored-programs/covid-19-resources-for-researchers/</a>
<a href="#">Memo to share with sponsors re: restrictions on human subjects-related research visits</a>
<a href="https://grants.nih.gov/grants/guide/notice-files/NOT-OD-20-087.html">https://grants.nih.gov/grants/guide/notice-files/NOT-OD-20-087.html</a>
<a href="https://www.fda.gov/regulatory-information/search-fda-guidance-documents/fda-guidance-conduct-clinical-trials-medical-products-during-covid-19-pandemic">https://www.fda.gov/regulatory-information/search-fda-guidance-documents/fda-guidance-conduct-clinical-trials-medical-products-during-covid-19-pandemic</a>

**Q0. How long will these measures last?**

We are unsure how long these restrictions will be needed; however, we anticipate that the restrictions will continue until at least April 3, 2020. UMMS understands that these measures are disruptive and may pose financial hardships. Please note that these restrictions will remain in effect until joint guidance is issued from the UMCCTS and UMMS IRB.

**Q1a. Can investigators conduct in-person research visits?**

After March 19, 2020, UMMS is restricting human subjects-related research visits to those that are essential to a subject's safety or well-being.

This restriction applies to all human subjects research – biomedical, socio-behavioral, or other.

This restriction applies to all non-essential in-person visits – regardless of whether a research visit is scheduled to coincide with a clinical visit or not.

This restriction applies to all non-essential in-person visits – regardless of whether the Clinical Research Center (CRC) is involved.

This restriction applies to all non-essential in-person procedures – regardless of whether they are timed with an existing clinical visit.

**Q1b. Can a provider who is also study staff and who sees a subject for a clinical visit conduct non-essential research procedures (e.g., enrollment, survey follow-up, images) at the time of that clinical visit?**

No – at this time, clinical visits must be limited to clinical activities (a) to limit person-to-person contact, exposure to equipment, etc., and (b) to maximize the ability of the clinical system to deliver patient care.

**Q1c. Can study staff retrieve equipment from subjects at the time of the subject's clinical visit?**

No – please do not arrange to collect anything from subjects at this time unless it is critical to the subject's wellbeing. The goal is to limit all subject/staff exposure.

Study staff may contact subjects to make arrangements to have them mail equipment back or to ask them to hold equipment until further notice. This would be reported to the IRB as a change to eliminate an apparent immediate hazard to subjects. If there is a specific sponsor that is concerned about equipment, please contact Danielle Howard in the Office of Clinical Research ([danielle.howard@umassmed.edu](mailto:danielle.howard@umassmed.edu)).

**Q2. Who decides whether in-person research visits are essential?**

Whether or not a research visit is "essential to a subject's safety or well-being" is determined by the principal investigator of the research study, the participant, and the participant's care provider, and should be informed by current public health guidance regarding the COVID-19 outbreak. It is the PI's responsibility to lead study staff accordingly.

Please notify the Sponsor of your studies about these changes.

**Q3. What about new enrollments?**

Enrollment of new patients on a clinical trial will be allowed only if:

1) participation in the trial is critical for the research participant's well-being. These studies must be discussed on a case-by-case basis with the IRB Chair.

Or 2) the trial is focused on evaluation of medications for COVID19 prevention or therapy.

Before enrolling new subjects into studies with in-person visits, the PI should assess

- How might long-term disruptions impair the ability of the subject team to monitor subjects and a subject's ability to participate safely. With respect to ensuring subject safety, the PI should consider the long-term administration of study interventions and investigational products, as well as the conduct of procedures required to ensure or monitor a subject's safety. *Note that the availability of resources may diminish after a subject enrolls.*
- The potential effect of missed visits on data integrity

Enrollment into any study that is or can be conducted entirely remotely may continue. All activities – recruitment, consent, documentation of consent (when applicable), and all other research activities – must be conducted remotely.

**Q4. Are there examples of studies that are not essential to a subject’s well-being or that do not offer a prospect of direct benefit?**

Examples of studies not essential to a subject’s well-being include (but are not limited to):

- Comparative effectiveness studies
- Biospecimen collection studies
- All non-interventional research

**Q5. What about subjects who are already enrolled (i.e., existing enrollments)?**

Contact subjects to conduct virtual visits, or to temporarily postpone or cancel in-person research visits that are not essential to the safety or well-being of the subject.

Where possible, convert in-person interactions to virtual ones using secure methods – such as [REDCap](#), [Qualtrics](#), [Zoom](#), phone, and [secure email](#).

Do not use Google Docs or Dropbox to communicate with subjects. As a general rule, regular email, text messaging, and voicemail should be handled as though the communications are public. Do not use them for confidential research information.

**Q6. What should we do about study specific labs that are required for patient safety?**

Labs that are necessary for patient safety must be conducted.

As instructed in the 3/12 memo, changes made to protocols in order to eliminate apparent immediate hazards to subjects, including the use of alternate laboratory facilities, can be made without prior IRB review and approval. However, they must then be reported to the UMMS IRB within 5 days in accordance with *HRP-801 INVESTIGATOR GUIDANCE: Prompt Reporting Requirements* (<https://www.umassmed.edu/ccts/irb/investigator-guidance/>).

To the extent possible, the use of external labs should be restricted to safety labs. Please be advised that use of external labs has billing implications that have not been resolved.

**Q7. What about subjects who are already enrolled (i.e., existing enrollments) who require study drugs?**

The PI will need to work with Investigational Drug Services on any proposed changes in dispensation ([IDS@umassmemorial.org](mailto:IDS@umassmemorial.org)). If a PI determines that they can safely dispense and monitor the study drug, and if IDS can support the plan, then this may proceed as a change to eliminate an immediate apparent hazard to subjects.

Study drugs may not be shipped by mail.

**Q8. When an in-person visit is essential to a subject's well-being, what are the COVID-19 requirements?**

The clinical care procedures in effect at the time and location of the visit apply. UMMHC ambulatory clinical/practice procedures include the requirement that all staff and visitors undergo screening for travel, symptoms, and potential exposures.

The study team is responsible to know and adhere to clinical requirements. The requirements outlined below may become more restrictive at any time.

- Accompanying family members are limited to 1 person per study participant
- Twenty-four hours prior to the visit, all research participants should be phone screened for fever, cough and flu-like symptoms by research staff, with repeat screening by research staff at the time of an in-person visit. Those who screen positive will require triage as per UMMHC protocol before being cleared to participate in an in-person research visit. More information on screening and triage is available on the UMMHC coronavirus site <https://www.umassmemorialhealthcare.org/umass-memorial-health-care/patients-visitors/coronavirus-covid-19-news-and-information>

**Q9. What if a visit that is essential to a subject's well-being cannot be conducted?**

PI's should take steps to minimize potential risks to subjects.

Protocol deviations that increase the risk of harm to subjects must be reported to the UMMS IRB within 5 days in accordance with *HRP-801 INVESTIGATOR GUIDANCE: Prompt Reporting Requirements* (<https://www.umassmed.edu/ccts/irb/investigator-guidance/>).

**Q10. What if my study is reviewed by an external IRB?**

After March 19, 2020, UMMS is restricting human subjects-related research visits to those that are essential to a subject's safety or well-being. This includes all research that is reviewed by an external IRB.

Check the external IRB's website for any additional requirements. The external IRB may have different reporting requirements and timelines than the UMMS IRB.

Check the external IRB's applicable SOPs. Contact the UMMS IRB if you are not sure of the applicable SOPs.

**Q11. What can investigators do without prior IRB review and approval?**

Changes to eliminate apparent immediate hazards to subjects can be made without prior IRB review and approval. However, they must then be reported to the UMMS IRB within 5 days in accordance with *HRP-801 INVESTIGATOR GUIDANCE: Prompt Reporting Requirements* (<https://www.umassmed.edu/ccts/irb/investigator-guidance/>).

This means that investigators can move to remote procedures, such as phone or [Zoom](#) interviews, without obtaining prior approval from the IRB.

**Q12. What changes require prior IRB review and approval?**

All changes require prior IRB review and approval with the exception of changes to eliminate apparent immediate hazards to subjects.

**Q13. How should changes be submitted or reported to the UMMS IRB?**

Changes to eliminate apparent immediate hazards to subjects must be initially submitted as Reportable New Information. For step-by-step instructions on *How to Submit a Reportable New Information (RNI)*, visit the eIRB Job Aids: <https://www.umassmed.edu/ccts/irb/eirb2/job-aids-ii/>

For example, if the protocol is approved to conduct in-person visits and the study team changes them to remote visits to eliminate apparent immediate hazards, this requires reporting to the IRB. This is true even if the change from an in-person visit to a remote visit does not put the subject at increased risk of harm.

An RNI to report a change to eliminate an apparent immediate hazard should describe the hazard, the changes implemented, and any additional information that may inform the IRB's risk assessment.

A study team may submit one RNI per study to cover all changes to eliminate apparent immediate hazards. As study teams prepare for changes related to the COVID-19 response, they might consider putting together a table for each study that includes: (a) the visits or procedures, (b) the changes (if any) being implemented to eliminate apparent immediate hazards, (c) an indication of whether each change puts subjects at increased risk of harm, (d) an explanation as to why or why not, (e) the steps (if applicable) being implemented to minimize risks to subjects, and (f) a summary of which subjects are affected – without private identifiable information.

Changes that are intended to become permanent must (also) be submitted as a Modification.

**Q14. What does not need to be submitted or reported to the UMMS IRB?**

Study teams do not need to report to the UMMS IRB

- That they have temporarily halted enrollment
- That they have implemented institutionally mandated COVID-19 screening procedures
- Missed visits or study visits out of window – so long as these deviations did not put subjects at increased risk of harm
- A list of specific visits by subjects that have been implemented remotely – so long as the initial report outlined in Q13 is submitted and so long as there is no new information suggesting that subjects are at an increased risk of harm

The following should, however, be documented in the study binder

- All temporary changes to enrollment status
- All interactions with research participants, including COVID-19 screening procedures
- All protocol deviations

Notes to file should cite this guidance to document why reporting to the UMMS IRB is not required.

**Q15. Do back-up staff need to be CITI trained?**

Investigators should consider taking steps to add personnel with the appropriate skills and training as active study staff in eIRB and on delegation logs to ensure coverage.

Investigators may add personnel who have not yet completed online [CITI](#) training in human subjects research and, when applicable, good clinical practice (GCP). Relative to the date an individual is added as study staff in eIRB, the UMMS IRB will temporarily permit a 30-day grace period for back-up staff to complete required online [CITI](#) training.

**Q16. What if the research has external funding?**

Investigators should alert their sponsors, program officers, and funders that after March 19, 2020, UMMS is restricting human subjects-related research visits to those that are essential to a subject's safety or well-being. The memo can be downloaded here: [Memo to share with sponsors re: restrictions on human subjects-related research visits](#)

NIH has issued direct guidance for all NIH-funded Clinical Trials and Human Subjects Studies Affected by COVID-19. The guidance addresses delays in research progress and unanticipated costs. For details please see: <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-20-087.html>

**Q17. What if investigators are planning to conduct COVID-19 research?**

After March 19, 2020, UMMS is restricting human subjects-related research visits to those that are essential to a subject's safety or well-being.

Please contact the UMMS IRB and UMCCTS Office of Clinical Research if you are planning research that is related to COVID-19. Investigators are also advised to contact the Institutional Biosafety Committee.

**Q18. How can study staff work on data securely from remote locations?**

Visit <https://www.umassmed.edu/it/>. UMass Med IT has a section devoted to *Tools for Working Remotely*.

**Q19. Are there any tools to document consent in writing remotely?**

[REDCap](#) supports this feature. [Secure email](#) can be used to send scanned documents or pictures/photos of signed consent forms.

**Q20. Are the IRB and Office of Clinical Research (OCR) offices open?**

UMMS IRB & OCR Offices are conducting operations remotely until further notice. This will likely result in increased response times, and we thank you in advance for your patience. Our electronic systems, eIRB, OnCore & TRAcS, all remain accessible via the web.

The IRB is conducting reviews – including reviews of new studies. The Office of Clinical Research is proceeding with all CDA/CTA negotiations. Both offices are giving priority to COVID-19 protocols.

**Q21. Who should be contacted for questions?**

For IRB-related questions: [allison.blodgett@umassmed.edu](mailto:allison.blodgett@umassmed.edu) or [irb@umassmed.edu](mailto:irb@umassmed.edu)

For OCR-related questions: [danielle.howard@umassmed.edu](mailto:danielle.howard@umassmed.edu) or [clinicalresearch@umassmed.edu](mailto:clinicalresearch@umassmed.edu)

**Q22. Will the UMMS HRPP be conducting audits during this timeframe?**

Consistent with social distancing, in-person auditing will not be conducted during this time frame. The UMMS HRPP reserves the right to conduct remote audits where possible.

**Q23. Has FDA issued any guidance regarding existing clinical trials?**

<https://www.fda.gov/regulatory-information/search-fda-guidance-documents/fda-guidance-conduct-clinical-trials-medical-products-during-covid-19-pandemic>

**Q24: Are there any extensions on IRB deadlines?**

**Expiration Dates: Please review your studies for expiration dates and plan for renewals, as needed.**

Unfortunately, expiration dates are dictated by the federal regulations and hard coded in eIRB.

Therefore, it is not possible for the IRB to issue a grace period on expiration dates. If a study lapses, all human subject research-related activities must stop.

The IRB tries very hard to renew studies before they expire. While we can't promise that we will be able to do so if there is a flood of late submissions, we will give priority to renewals that are essential to the safety or well-being of subjects. Note that these studies typically require review by the convened IRB. Thus, this increases the chance that an essential study may expire before a late continuing review can be reviewed. If a study will expire and the PI believes that subjects may be harmed by stopping human research procedures that are not available outside the human research context, we ask the PI to contact the IRB with a description of the procedures, the potential harm to subjects from stopping, and a brief explanation as to why the procedures are not available outside of the human research context.

**Continuing Review Submission Deadlines:** Please be reassured that the IRB has never actually placed an investigator on restricted status for missing a deadline for submitting a continuing review. We do not intend to start now. A small amount of wiggle room is built into the existing IRB due dates for submitting a continuing review.

The IRB recognizes that under current circumstances it may not be possible for investigators to meet the continuing review deadlines. We are hopeful that the majority of renewals will be received in time for the IRB to reapprove each study before it expires.

If a continuing review will be submitted late, it may be helpful to hold any modifications until after the continuing review is approved. Plain continuing reviews are typically processed more quickly than continuing reviews that include a modification. Continuing reviews that are complete and that require review by the convened IRB are scheduled for the next available meeting.

In most cases – but not all – the initial approval letter at the parent study in eIRB will tell investigators whether their continuing review will undergo Committee or Non-Committee Review. If investigators have questions about the review type, we recommend that they contact the IRB office.

**Q25. How are compassionate or emergency use cases handled?**

Please contact IDS, IRB, and OCR.

Relevant worksheets can be downloaded from the IRB website – IMPORTANT – they are not optimized for fast web viewing and must be downloaded and then opened directly:

<https://www.umassmed.edu/ccts/irb/policies-sops--checklists-worksheets/sop/>

HRP-451 WORKSHEET: Emergency Use Drugs and Biologics

HRP-452 WORKSHEET: Emergency Use Devices

HRP-453 WORKSHEET: Compassionate Use Devices

HRP-454 WORKSHEET: Expanded Access Drugs and Biologics



Prior UMCCTS Memos	
03/12/2020	Changes in Clinical Research Operations due to COVID19
03/12/2020	UMass Memorial Health Care 2019 Novel Coronavirus (COVID-19) Ambulatory Clinic/Practice Procedure AMBULATORY CLINICS v. 03 02 2020
03/12/2020	COVID19-IRB Updates
03/13/2020	COVID 19 Clinical Research Memo March 13
03/16/2020	Joint UMCCTS IRB COVID19 Guidance 16mar2020 (Version 1)
03/17/2020	Joint UMCCTS IRB COVID19 Guidance 17mar2020 (Version 2)
03/18/2020	Joint UMCCTS IRB COVID19 Guidance 18mar2020 (Version 3)

### **Document History**

Version 1, March 16, 2020: Initial

Version 2, March 17, 2020: Clarified restrictions on research visits timed with clinical visits, clarified permitted enrollment into studies conducted entirely remotely, added note regarding use of external labs, updated list of prior memos, acknowledged hardship imposed by restrictions, reinserted links, and made minor administrative changes

Version 3, March 18, 2020: Clarified reporting requirements, added information related to audits, added information related to equipment return, confirmed offices open and prioritizing COVID-19 research, added NIH link, flagging updated items with **yellow** marker

Version 4, March 19, 2020: Added link to FDA guidance for clinical trials, link to OSP page, link to memo to share with sponsors, and information related to continuing reviews and emergency use