Penn
University of Pennsylvania
Human Research Protections Program

IRB Determination Guidance

Initial Review

The IRB may make one of the following determinations as a result of its review of research submitted for initial review.

Determination	Explanation
Approval	When an acceptable risk/benefit ratio exists and the criteria required for approval are deemed acceptable, protocol is approved as submitted.
Withheld Approval	The IRB determines that the protocol will meet the regulatory criteria for approval provided the investigator agrees to make specific changes to the IRB application including the informed consent document. Only when the convened IRB stipulates specific revisions requiring concurrence by the investigator may the IRB Executive Chair, Chair or another designated IRB member subsequently approve the revised research protocol on behalf of the IRB under an expedited review procedure. **Research may not be initiated until a letter of IRB approval is received and other applicable committee reviews are satisfied.**
Tabled	The IRB requires substantive changes that are directly relevant to the determinations required by the IRB under federal regulations at §_.111, the IRB will table the approval of the protocol pending subsequent review by the convened IRB of the responsive material.
Disapproved	The IRB determines that the research does not meet the regulatory criteria for approval and cannot provide modifications that may allow the protocol to be approved.

Ongoing Review

The IRB may make one of the following determinations as a result of its review of research submitted for continuation or modification.

Determination	Explanation
Approval	When an acceptable risk/benefit ratio exists and the criteria required for approval are deemed acceptable, protocol is approved as submitted.
Conditional/Withheld Approval	When the IRB determines requires minor modification to the protocol or accompanying documents.
Tabled	The IRB requires substantive changes that are directly relevant to the determinations required by the IRB under

	federal regulations at §_.111, the IRB will table the approval of the protocol pending subsequent review by the convened IRB of the responsive material.

Withheld Approval vs. Tabled

WITHHELD APPROVAL PENDING CHANGES

When the IRB votes to Withhold Approval Pending Changes an IRB chair or experienced IRB reviewer may approve the response using an expedited mechanism. When the IRB withholds approval, the IRB should have in mind a clearly defined protocol that it is willing to approve. This protocol does not exist in final form but represents the submitted protocol with specific required modifications. The IRB should document the required modifications so that an IRB chair or experienced IRB member can judge whether the revised protocol matches the one the IRB was willing to approve. The IRB should provide the investigator specific and directive changes required to secure approval. For example:

- "Participants must be 18 years or older."
- "Drop the placebo-controlled arm of this study."
- "Offer psychological counseling to all participants at the study's conclusion."
- "Include in the consent all side effects listed in the investigator's brochure."

The IRB may be less specific provided the modifications may be reviewed by the expedited procedure. For example, "Rewrite the content of the consent into lay language," or "Modify advertisements according to IRB policy" or "Submit quality of life surveys for review."

TABLED

The IRB should not grant withheld approval if the committee is unable to be directive with stipulations because there are open-ended questions that impact the criteria for approval. Such requests would include:

"Explain why participants less than 18 years of age will be allowed to participate."

- "Provide additional justification for the use of placebo."
- "Clarify whether participants will be offered counseling services at the end of the study."
- "Indicate how often the data and safety monitoring board will meet."
- "Provide additional animal data for the study drug."