Pilot Activities

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1. PURPOSE

1.1. Some *research* studies are designed with multiple phases where the first phase is to gather preliminary information or test the research design or methods. These initial phases are sometimes referred to as "*pilot studies*". A distinction should be made whether the proposed activities are pilot activities or activities preparatory to *research* like when conducting a *feasibility study*. *Research* means a systematic investigation, including *research* development, testing and evaluation, designed to develop or contribute to *generalizable knowledge*. Since a pilot study that meets the definition of *research* may create all of the same risks for subjects/participants that are created by a full-blown study, *pilot studies* therefore require IRB review and approval. The purpose of this *policy* is to provide guidance for determining when initial activities need IRB review and approval.

2. DEFINITIONS

- 2.1. *Pilot Study:* A preliminary investigation usually conducted on a small scale (e.g., 10 or fewer subjects) that may be exploratory in nature or designed to test *procedures* that are intended for a larger study.
- 2.2. *Feasibility Study:* An assessment of the practicality of a proposed plan or method or use of an instrument for data collection, often involving colleagues or experts who can evaluate if the proposed method/design/instrument will result in sufficient information to answer the *research* questions.

3. POLICY

- 3.1. Submissions meeting the definition of "*pilot study*" above and the definition of *human subjects research* require IRB review and approval or determination prior to beginning the project.
- 3.2. Even if results collected through a *pilot study* will not be used in *research* reports or publications but if the study will be conducted to develop or evaluate *research procedures* or test instruments, then the study represents part of the *research* process that leads to the development of or contribution to *generalizable knowledge* and meet the definition of *research*.
- 3.3. The pilot activities should be described to study participants as such during the consent process.

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- 3.4. Submissions meeting the definition of "*feasibility study*" above and that involve *human subjects* may not meet the definition of "*research*". Such submissions will be evaluated using Policy and Procedure: Determination of Human Research.
- 3.4.1.The IRB cannot provide retroactive approval. Information collected for a *feasibility study* that did not meet the definition of *research* may not be repurposed as a *research* study.
- 3.5. A *pilot study* can be modified to include main study procedures and other changes or the main study can be submitted separately and linked to the *pilot study* via submission documents. The investigator can make the initial assessment of the appropriate submission route for the main study.
- 3.6. The IRB may determine that the changes needed to transition from a *pilot study* to a main study so significantly impact the design and/or risk assessment that a *modification* is not appropriate and that a new initial submission will be required (see Policy and Procedure: Review of Modifications to Previously Approved Research.)

4. PROCEDURES: Researchers

- 4.1. The researcher must complete the submission form through the IRB's electronic application system.
- 4.2. The submission or phases of the submission that are considered pilot activities must be clearly identified. The Decision Chart "Pilot Study Determination" can be used as guidance.
- 4.3. Potential participants must be notified during the consent process if any part or all of the activities are for a *pilot study* or for purpose of preparing for or contributing to the design of a larger study. The submission must include sufficient information about how the information provided may be used as part of the larger study.

5. PROCEDURES: Institutional Review Board

- 5.1. The IRB will review the submission to determine if part or all of the study meets the definition of a "*pilot study*".
- 5.2. Activities proposed as preliminary to *research* will be evaluated to determine if the activities meet the definition of *research* using Policy and Procedure: Determination of Human Research. If the activities do not meet the definition of *research*, the *procedures* in that *policy* will be used to complete the review process.
- 5.3. For *non-committee reviews*, IRB staff will offer the investigator the opportunity to provide additional information/materials and/or to revise the submission in appropriate review correspondence.

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- 5.4. For committee reviews, IRB staff will offer the investigator the opportunity to provide additional information/materials and/or to revise the submission in appropriate review correspondence that describes missing information or required *modifications*.
- 5.5. IRB Staff will document information pertaining to determinations that the requirements of this *policy* have been met in the review history for *non-committee reviews* and, for *research* reviewed by committee, in the meeting minutes by recording the motion to approve.

6. MATERIALS

6.1. Decision Tree: Pilot Study Determination

7. REFERENCES

7.1. Policy and Procedure: Determination of Human Research