

UCSD HRPP: Study Matrix for Single IRB Federal Requirement

Project Characteristics	Project Has IRB Approval		Project Does Not Have IRB Approval	
	First Obtained Before January 21, 2019	First Obtained On or After January 21, 2019	Expected Before January 20, 2020	Not Expected Before January 20, 2020
No Federal Support	New Single IRB Regulation Not Applicable			
Federal Support				
•NIH	Comply with Existing NIH Policy			Comply with New Single IRB Regulation
•Dept. of Health & Human Services (other than NIH)	New Single IRB Regulation Not Applicable			Comply with New Single IRB Regulation
•Dept. of Justice	New Single IRB Regulation Not Applicable			
•Other Federal Agencies	New Single IRB Regulation Not Applicable	Contact Lead Site and/or Program Officer for Compliance Expectations		Comply with New Single IRB Regulation

NOTES:

New Single IRB Regulation Not Applicable: Single IRB may still be used voluntarily or may be required by the funding source or lead site.

Comply with Existing NIH Policy: The new regulation does not apply as long as your existing project/site has IRB approval before January 20, 2020 **AND** is either already under an sIRB arrangement OR is not subject to the NIH policy (e.g., training grants, NIH-granted exceptions).

Comply with New Single IRB Regulation: This means that all domestic sites engaged in federally-supported cooperative research must rely on a single IRB that has either been identified by the supporting agency or proposed by the lead institution unless a law requires more than single IRB review (for example, tribal law) or the supporting agency determines and documents that a single IRB is not appropriate for the context.