A note on single IRB requirement for cooperative research conducted under the revised Common Rule and initiated before January 20, 2020

The NYU IRB, with few exceptions, will not transition currently approved cooperative research to single IRB. Please read the excerpt below from the Office for Human Research Protections November 2019 guidance, “Determination of Exception for Certain HHS-Conducted or -Supported Cooperative Research Activities Subject to the 2018 Requirements.”

“One of the objectives of the revised Common Rule’s single IRB requirement is to reduce administrative costs of cooperative research. For cooperative research that already has been initially approved by multiple IRBs, the cost savings associated with reduced IRB reviews would not be achieved by making the single IRB requirement applicable to such cooperative research. Members of the regulated community report that transitioning cooperative research from multiple IRBs to a single IRB would, conversely, be costly for most institutions. Further, excepting such research from the single IRB mandate would not adversely affect the rights and welfare of the research subjects. For these reasons, OHRP has decided to except cooperative research approved before January 20, 2020, from the single IRB mandate.”