

Matrix for IRB Review and Reliance

\* If a project includes a line item for IRB fees, VCU expects the funding source to pay the IRB fees, whenever possible. For information on IRB fees, please refer to the June 16, 2021 [Full Cost Recovery Guidelines for Clinical Research Initiated and Sponsored by Industry Compliance Notice](#).

\*\* The RAMS-IRB Reliance application is an abbreviated version of the standard application.

Study type	IRB Fee Payer*	IRB OF Record	Process
Research where a VCU investigator holds the IND/IDE	None	VCU IRB	<ul style="list-style-type: none"> <li>Submit standard application via RAMS-IRB</li> </ul>
Student-Led Human Subjects Research for credit or scholarship, with faculty member acting as PI	None	VCU IRB	<ul style="list-style-type: none"> <li>Submit standard application via RAMS-IRB</li> </ul>
Investigator-initiated single-site Human Subjects Research supported by internal VCU departmental or miscellaneous funds (considered “unfunded”)	None	VCU IRB	<ul style="list-style-type: none"> <li>Submit a standard application via RAMS-IRB</li> </ul>
Exempt Studies, regardless of funding source	None	VCU IRB	<ul style="list-style-type: none"> <li>Submit a standard application via RAMS-IRB</li> </ul>
“Not Human Subjects Research (NHSR)” studies, regardless of funding source	None	VCU IRB	<ul style="list-style-type: none"> <li>Submit a standard application via RAMS-IRB</li> </ul>
Studies supported by the National Cancer Institute	None	NCI CIRB	<ul style="list-style-type: none"> <li>Submit an IRB Reliance Application** in RAMS-IRB; <b>AND</b></li> <li>Submit an application to the external IRB.</li> </ul>
Emergency Use, Expanded Access, Compassionate Use, HUD, and Single-Patient IND/IDE studies	None	VCU IRB	<ul style="list-style-type: none"> <li>Submit a standard application via RAMS-IRB</li> </ul>
Emergency Use, Expanded Access, Compassionate Use, HUD, and Single-Patient IND/IDE studies <b><u>where the external sponsor requires use of a specific external IRB</u></b>	Sponsor	External IRB, as required by the Sponsor	<ul style="list-style-type: none"> <li>Submit an IRB Reliance Application** in RAMS-IRB; <b>AND</b></li> <li>Submit an application to the external IRB.</li> </ul>
Industry sponsored studies where the sponsor does <b><u>not</u></b> require the use of a specific IRB	Sponsor	External Commercial IRB (e.g., Advarra IRB or WCG)	<ul style="list-style-type: none"> <li>Submit an IRB Reliance Application** in RAMS-IRB; <b>AND</b></li> <li>Submit an application to the external IRB.</li> </ul>
Industry sponsored studies where the external sponsor <b><u>does</u></b> require use of a specific external IRB	Sponsor	Specified External IRB (commercial or academic)	<ul style="list-style-type: none"> <li>Submit an IRB Reliance Application** in RAMS-IRB; <b>AND</b></li> <li>Submit an application to the external IRB.</li> </ul>
Externally funded investigator-initiated Human Subjects Research	External funding source or TBD (depending on the contract)	Advarra IRB	<ul style="list-style-type: none"> <li>Submit an IRB Reliance Application in RAMS-IRB; <b>AND</b></li> <li>Submit an application to Advarra IRB (CIRBI.net).</li> </ul>
Other externally funded Human Subjects Research (e.g., foundations, consortiums)	External funding source or TBD (depending on the contract)	Advarra IRB Or, IRB required by the Sponsor	<ul style="list-style-type: none"> <li>Submit an IRB Reliance Application in RAMS-IRB; <b>AND</b></li> <li>Submit an application to Advarra IRB (CIRBI.net).</li> </ul>
Federally funded Human Subjects Research	VCU HRPP or TBD (depending on the contract)	Advarra IRB for VCU primed grants Or, IRB as required by prime site	<ul style="list-style-type: none"> <li>Submit an IRB Reliance Application in RAMS-IRB; <b>AND</b></li> <li>Submit an application to Advarra IRB (CIRBI.net).</li> </ul>