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Subject: IRB, IACUC, & IBC Initial Review Policy

ORGS Office: Office of Sponsored Programs

CMU Partner Office (if applicable): N/A

Originator & Original Date: Anne Kea & Sarah Hall 11/20/2025

Annual Final Approval Provided By: Executive Director

Applicable Area: Post Award

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Purpose:

To identify the standard guidelines for the initial review of compliance determination notices for externally funded projects that require Institutional Review Board (IRB), Institutional Animal Care and Use Committee (IACUC), and/or Institutional Biosafety Committee (IBC) oversight.

Key Definitions

- **Institutional Review Board (IRB)** - A committee that reviews and oversees human subjects research. IRBs include members of various backgrounds and disciplines, both scientific and non-scientific.
- **Institutional Animal Care and Use Committee (IACUC)** – A committee established at institutions that use live vertebrate animals for research, teaching, or testing.
- **Institutional Biosafety Committee (IBC)** – A committee that reviews and oversees research involving biological materials, such as recombinant or synthetic nucleic acid molecules, to ensure the safety of personnel, the community, and the environment

General Background Information (*including applicable policies, procedures, regulations, etc. - delete if not applicable*):

- **CMU Policy #5-4** – Human Subjects Research
- **CMU Policy #3-71** – Animal Subject Research
- **CMU Policy #3-47** – Institutional Biosafety Program

Narrative/Details (*identify responsible staff and outline steps/directions*):

1. If an externally funded project requires oversight from either the IRB, IACUC, or IBC, it is the Principal Investigator/Project Director (PI/PD)'s responsibility to ensure that any required reviews and/or approvals are on file from the appropriate committee prior to any related work beginning on the project.
2. If, upon Post Award's initial review of the award documents, there is not already a determination notice on file from the appropriate committee(s), the Post Award team member will reach out to the PI/PD requesting a copy for the grant file. The Grant Accountant assigned to the project will also be included in any associated correspondence.

- a. If the Post Award team member has not received a copy of the determination notice, or a status update regarding the application submission and approval, within two weeks of first reaching out, a second reminder will be emailed with the department Chair, ORGS Executive Director (ED), and Assistant Director for Post Award Sponsored Projects (ADPSP) copied in as well.
- b. If, two weeks after the second reminder has been sent, the determination notice or a status update has not been received, a third and final reminder will be emailed with the college Dean and ORGS Vice President for Research and Innovation (VPRI) copied in as well.
3. OSP will only require that the initial determination notice is on file for projects needing IRB, IACUC, or IBC oversight. It will remain the PI/PD's responsibility to ensure that appropriate compliance approvals remain in place for the duration of the project as applicable.

Remedies

If, two weeks after the third reminder has been sent, the determination notice or a status update has not been received, the grant account will be locked and no expenses will be able to be charged until a determination notice is on file or it is confirmed that no work requiring IRB, IACUC, and/or IBC oversight has begun on the project.

Exceptions

Exceptions for this policy may be granted by the Vice President for Research and Innovation, or their designee, in alignment with other applicable university, federal, state, and sponsor regulations and any other necessary approvals.