UCLA Research Administration
Human Research Protection Program

UCLA/RAND Memorandum of Understanding and Affiliated IRB Reliance Procedures: Frequently Asked Questions (FAQs)

(Last updated: February 4, 2022)

What is the UCLA/RAND Memorandum of Understanding & IRB Deferral Mechanism?

The "Memorandum of Understanding Between RAND and UCLA" (MOU), has been in place since September 2002, to promote collaboration in health services research conducted by UCLA and RAND. It celebrates the joint research of the institutions, supports joint recruitment and appointments, and through an amendment, facilitates human subjects research review through a deferral mechanism that allows one of the two institutions to take responsibility for IRB review on behalf of both institutions.

UCLA-RAND MOU for Health Services Research
Amendment for IRB review of collaborative research
2006 Memo – Joint IRB Deferral Mechanism for Health and Health Services Research

What is the scope of research covered by the MOU?

UCLA and RAND programs are jointly involved in **research to document and improve health care services, quality of care, health policy, community health, and health-related outcomes (including societal, environmental, and individual determinants of health)**, and **other health-related research**.

Research within these broad fields, conducted jointly by UCLA and RAND or jointly supported by the infrastructures of these institutions, falls under the scope of the MOU.

What is the IRB deferral mechanism?

For research that falls within the scope of the MOU, only one institution – either UCLA or RAND will be the sole IRB.

There are three categories of studies for which UCLA will be the sole IRB:
1. Research that is subject to regulation by the Food and Drug Administration (FDA);
2. Research requiring UCLA Health Insurance Portability Accountability Act (HIPAA) privacy board review, e.g., research involving UCLA medical records or research that generates data to be entered into UCLA medical records; and
3. Research involving the collection and/or use of human tissue and specimens.

All other research will be reviewed with RAND as the sole IRB. However, RAND has the right to defer any review back to UCLA, in which case UCLA will be the sole IRB.

The IRB that conducts the initial review will remain the IRB throughout a project's life, except in certain circumstances, such as when a project initially reviewed by RAND subsequently is

revised so it meets the criteria for review by UCLA, e.g., by addition of procedures for collecting blood samples.

The reviewing IRB responsibility may also be transferred at the request of the Principal Investigator.

The IRB reliance mechanism will remain in effect until any change in mechanisms or processes are jointly agreed upon by UCLA and RAND, either through amendment or cancellation. Updates will be posted on the human subjects protection websites of each institution.

Do I need to be affiliated with UCLA to submit an application to the UCLA IRB? Do I need to be affiliated with RAND to submit an application to the RAND IRB?

No, but a member of the research team who is affiliated with the reviewing institution should be identified as the Principal Investigator (PI) on the *Request to Defer Review of Human Subjects Research*. A UCLA-affiliated member of the research team should be identified as PI on an application for UCLA IRB review or exemption from IRB review, and a RAND-affiliated member of the research team should be identified as PI on an application for RAND IRB review or exemption from IRB review.

If a UCLA-affiliated person does not qualify to be PI in accordance with UCLA Policy 900[1], the application should either: (1) include a letter of exception as described in III.C.1. of Policy 900, or (2) be co-signed by a Policy-900 qualified Faculty Sponsor.

How do I submit a *Request to Defer Review of Human Subjects Research* for a new project to a single IRB?

Complete the *Request to Defer Review of Human Subjects Research* form and append it to your electronic application to the reviewing IRB.

Note: For protocols reviewed by the RAND IRB, a submission in the UCLA IRB electronic submission system is required to facilitate UCLA OHRPP/IRB documentation of the reliance.

Who do I contact with questions?

UCLA irbreliance@research.ucla.edu or
RAND hspcadmin@rand.org

[1] UCLA Policy 900, Principal Investigator Eligibility" http://www.adminpolicies.ucla.edu/pdf/900.pdf