**Timeline 1: General Mechanics of the Transition Provision**

**Beginning of Delay Period**
- **Default Rule:** All studies must comply with the pre-2018 Requirements.
- **Exception:** An institution may voluntarily elect to transition a study or studies to the 2018 Requirements.*
  - During the delay period, these transitioned studies comply with the pre-2018 Requirements + the three burden-reducing provisions of the 2018 Requirements.

**General Compliance Date of the 2018 Requirements + End of Delay Period**
- All studies initiated on or after this date must comply with the 2018 Requirements.
- All studies transitioned to the 2018 Requirements during the delay period must comply with the entirety of the 2018 Requirements on and after this date.
- On and after this date, all other ongoing studies must comply with the Pre-2018 Requirements unless an institution voluntarily elects to transition the study to comply with the entirety of the 2018 Requirements.

* If an institution wishes to take advantage of the three burden-reducing provisions of the 2018 Requirements during the delay period the institution must first determine (and the IRB or institution must document) that a study or set of studies will transition to comply with the 2018 Requirements. As described above, during the delay period, studies that have transitioned to comply with the 2018 Requirements must comply with the pre-2018 Requirements + the three burden-reducing provisions of the 2018 Requirements. On and after January 21, 2019, those transitioned studies must comply with the entirety of the 2018 Requirements.
**Timeline 2: Research that Transitions to the 2018 Requirements During the Delay Period**

**Beginning of Delay Period**
- Study A initiated.
- Study A must comply with the pre-2018 Requirements.

**General Compliance Date of the 2018 Requirements + End of Delay Period**
- In order to take advantage of the three burden-reducing provisions of the 2018 Requirements during the delay period, the institution determines (and the IRB or institution documents) that Study A will transition to comply with the 2018 Requirements.
- This election may not be reversed.
- On and after this date, Study A must comply with the entirety of the 2018 Requirements.
- Institution may not revert study compliance to the pre-2018 Requirements.

* If an institution wishes to take advantage of the three burden-reducing provisions of the 2018 Requirements during the delay period the institution must first determine (and the IRB or institution must document) that a study or set of studies will transition to comply with the 2018 Requirements. During the delay period, studies that have transitioned to comply with the 2018 Requirements must comply with the pre-2018 Requirements + the three burden-reducing provisions of the 2018 Requirements.
Timeline 3: Ongoing Research that Transitions to the 2018 Requirements On or After January 21, 2019

- **Beginning of Delay Period**
  - July 19, 2018
  - Study B initiated.
  - Study B must comply with the pre-2018 Requirements.
  - Study B’s institution takes no steps to transition study to comply with the 2018 Requirements.
  - Study B continues to comply with the pre-2018 Requirements.

- **General Compliance Date for 2018 Requirements + End of Delay Period**
  - January 21, 2019
  - Study B’s institution takes no steps to transition study to comply with the 2018 Requirements.
  - Study B continues to comply with the pre-2018 Requirements.

- **Study Transition Date**
  - Study B must comply with the entirety of the 2018 Requirements on and after this date.
  - Institution may not revert study compliance to the pre-2018 Requirements.
  - Institution determines (and IRB or institution documents and dates) that ongoing study will comply with 2018 Requirements.