

IRB Fee Update: Effective March 1, 2025

Announcement date: 1/28/2025

IPA's commitment to ethical research

At IPA, we are committed to high standards of research, which includes careful attention to safeguarding and human subjects protection. Conducting ethical research requires extra time, work, and costs to carry out and document. As researchers, we rely on Institutional Review Boards (IRBs) to provide independent oversight of ethical risks and protocols that govern our research. At IPA, we seek to streamline administrative procedures, shorten timelines, and help research teams understand the requirements of human subjects ethical research. Therefore, we formed an IRB to serve IPA researchers and have dedicated staff administering this IRB who answer questions with rapid turnaround, providing tailored personal service to researchers and research teams.

IRB operational costs

Since 2020, IPA IRB has charged fees for each IRB submission in order to cover the costs involved in operating the IRB.

A recent review of the IRB's finances concluded that the fee revenue has fallen short of covering its costs, which is not financially sustainable. There are several reasons for this shortfall:

- 1) **Increased labor costs:** Normal wage inflation has risen in the past four years, increasing labor costs by about 20 percent since 2020. Also, in 2024, we have dedicated additional staff time to operating the IRB, which has sped up review and response times in comparison to previous years. (For example: in November 2024, submissions received feedback and were ultimately approved approximately 3x faster than in November 2023.) Dedicating additional staff time to operating the IRB has necessarily resulted in increased labor costs.
- 2) **Old projects exempted from fees:** IPA IRB's current fee structure, in which fees are charged per submission rather than once per entire project, came into effect on August 1, 2020. Since then, the IRB has waived fees for all amendment and renewal submissions on projects which began prior to this date. Approximately 30 of these projects are still active. This means that over the last several years the IRB has absorbed the costs of reviewing hundreds of these submissions, which is no longer sustainable nor fair.
- 3) **Rising external costs:** Other, external costs involved in operating the IRB, such as the cost of maintaining IPA's institutional CITI Program subscription for human subjects training—will increase in 2025.

Changes as of March 1, 2025

To better cover the IRB's operational costs, the IRB will make two key changes:

- 1) **Fees will apply to all projects, regardless of start date:** Starting March 1, 2025, long-running projects will no longer be exempt from fees for amendment and renewal submissions.
- 2) **Increased fee amounts:** Fee amounts for all submission types will be increased by 17-20%. This will be the first time fee amounts have changed since 2020.

Additionally:

- 3) **No longer waiving fees for withdrawn submissions:** In recent years, IRB staff have occasionally conducted a review of a submission nearly to completion before the research team/PI cancels the project or otherwise withdraws the IRB submission. We have not charged a fee for this review. Going forward, in these cases, a fee will be charged as applicable according to the submission type. This is an acknowledgement that fees cover effort expended and services provided, not approval itself.

These changes are reflected in Table 1. This fee structure will allow the IRB to continue to provide a high level of service to our investigators and their teams. We welcome feedback on our work as we always have, at humansubjects@poverty-action.org.

Fee review

As part of the process of deciding new fee amounts, we have conducted a fee review to identify institutions that provide comparable services and to document their fees for comparison. A number of institutions do not charge their own faculty for IRB review, choosing to fund those services through other means than direct charges, so we excluded those institutions from the list. Table 2 presents illustrative fee charges for 8 comparable institutions.

Table 1. IPA IRB Fees – Effective March 1, 2025

Submission Type	Subcategory	Current Amount	New Amount
Initial Review	<i>Expedited or exempt</i>	\$1,800	\$2,100
	<i>Full Board</i>	\$2,500	\$3,000
	<i>Additional fee for applications from non-IPA projects</i>	\$500	\$600
Amendment	<i>Expedited</i>	\$500	\$600
	<i>Full Board</i>	\$1,200	\$1,400
	<i>Personnel & administrative changes</i>	Free	Free
Renewal	<i>Expedited</i>	\$500	\$600
	<i>Full Board, no changes</i>	\$500	\$600
	<i>Full Board, includes changes</i>	\$500	\$1,400
	<i>Additional fee for late renewal (expired >2 months)</i>	\$500	\$600
Unexpected Event		Free	Free
Closure		Free	Free
Reliance Agreement	<i>IPA Relying</i>	\$500	\$600
	<i>IPA Reviewing</i>	Free	\$200

*Renewals that include changes and are reviewed by the full Board will now be charged the same amount as amendments renewed by the full Board (these submission types take similar effort to review).

**Reliance agreements where IPA IRB is designated as the IRB of record will now be charged this small fee to cover work involved in executing the agreement.

What your fees pay for

As a non-profit organization, we seek to recover costs only. Users of the system understandably want to pay the marginal costs, not the average costs, but we do have to spread all the costs over all users in a fair manner. Therefore, for total transparency, we provide some information here about the types of costs that IRB fees are meant to cover.

- Staff time and training, including processing submissions, executing reliance agreements, advising projects and responding to questions, preparing templates and customized guidance on consent forms, recruiting and working with Board members
- Board member honoraria
- Annual CITI organizational subscription for human subjects training

The structure of fees is roughly aligned with the amount of effort required to process each submission. For every submission, a trained IRB analyst at IPA intakes the submission, carefully reviews it, in some cases escalates it to a second reviewer, and handles communication back to the PI/project team, sometimes through multiple re-submissions and clarification meetings, all before processing approval for the submission and documenting any necessary findings as required by federal human subjects protection regulations. Additional effort is involved in this process if the submission/project is greater than minimal risk and must be reviewed by the full Board.

Timing of the change and future changes

The new fee structure included above will be effective March 1, 2025. This means that these fees will apply to any submission made after March 1, 2025.

We advise projects going forward to budget using this new fee structure and to assume a cost escalation of 3% per year, to account for possible adjustments as our operating costs rise. That does not mean we will automatically increase fees annually, but such increases may occasionally be warranted.

Budgeting guidance

This fee schedule should be used for all project budgeting going forward, i.e., for both ongoing and new projects.

Please note that all fees are the responsibility of the principal investigator. Most fees will be paid directly from the project grant indicated at the time of submission. Costs incurred after a project grant expires are the responsibility of the investigator, who will be sent an invoice at their institution.

Non-IPA projects

IPA's IRB exists primarily to serve investigators who hold an IPA grant and/or use IPA staff to conduct research. While we have occasionally reviewed projects which do not meet these criteria, we always prioritize IPA studies and will continue to do so in the future. As noted in the fee structure included above, non-IPA projects incur an additional fee at the time of initial application which is meant to cover administrative work normally done by IPA project staff.

Where to seek IRB coverage?

If you are deciding how to arrange IRB coverage for an IPA project, you have the following options:

- 1) **IPA IRB:** IPA IRB conducts its own review of the project.
- 2) **HML IRB:** HML IRB may review the project in place of IPA IRB. Only projects which are minimal risk, involve no particularly sensitive questions or vulnerable subjects, and are not federally funded should submit to HML IRB.
- 3) **Reliance agreement with other institution:** In some cases, IRB review may be required at another institution (e.g., the PI's university, or the institution funding the study). If you prefer that IPA IRB cedes oversight to this other institution's IRB, we will need to set up a "reliance agreement" formally documenting this arrangement.

A reliance agreement is a formal, written agreement between two (or more) IRBs which enables one institution engaged in research to rely on another institution's IRB review. The advantage of a reliance agreement is that, rather than having multiple IRBs conduct their own full review of a research project, only one institution is designated to conduct a full review, thereby streamlining the IRB process and reducing burdens on investigators.

A reliance agreement can be set up to document that IPA IRB will rely on another institution's review, or to designate IPA IRB as the reviewing IRB, with another IRB relying on our review.

As indicated in the fee schedule above, there is a one-time fee for setting up a reliance agreement. For reviews conducted by HML IRB, HML charges fees according to their own [fee schedule](#).

To initiate the process of setting up a reliance agreement for your project, or to inquire more about submitting to HML IRB, email humansubjects@poverty-action.org. We plan to release additional guidance and resources regarding reliance agreements in 2025.

Table 2. IRB fees for 8 comparable institutions*

Submission Type	Subcategory	IPA	Columbia University	Yale University	University of Pennsylvania	Northwestern University	University of California, Irvine	University of California, San Francisco	HML	BRANY
Initial Review	<i>Expedited or exempt</i>	\$2,100	\$3,000	\$3,500	\$2500 expedited, \$1500 exempt	\$3,000	\$2,871	\$1,540	\$1,500	\$1050 + \$155 for each additional informed consent
	<i>Full Board</i>	\$3,000			\$3,000			\$3,930	\$2,500 first hour + \$500 each additional hour (up to \$4000)	\$1575 + \$155 for each additional informed consent
	<i>Additional fee for applications from non-IPA projects</i>	\$600	N/a							
Amendment	<i>Expedited</i>	\$600	\$750	\$500	\$500	\$2250 inclusive, billed annually	Free	\$290	\$500	\$420
	<i>Full Board</i>	\$1,400		\$750	\$750			\$290	\$500	\$575
	<i>Personnel & administrative changes</i>	Free	Free	\$0 or \$500 for change of PI	\$500			\$290	Free	\$315 - \$420
Renewal	<i>Expedited</i>	\$600	\$1,500	\$1,500	\$1,500	\$1,500		\$1,540	\$500	\$1,050

