

## Approaches to Support IRB Members

IRBs are often composed of members affiliated with the institution it serves, as well as of non-affiliated individuals. To maintain a committed and engaged IRB, it is important to acknowledge members' commitment of time and effort. Such acknowledgement may be provided in different ways, including, but not limited to, fulfillment of service responsibility, course or other commitment release, access to affiliated library services, or financial compensation. To assist IRBs efforts to achieve and maintain a diverse membership, this document outlines considerations for acknowledgement and support of institutionally affiliated and non-affiliated members of the IRB, recognizing that practices and norms will vary by institution, its resources, the demands of IRB service, and the roles and responsibilities of the individual member.

### Resources to Support Digital Access and Virtual Work Environment

IRB documents are typically shared electronically, and IRB meetings may be conducted in person or virtually. In the interest of achieving inclusive and diverse participation, regardless of the meeting form, the HRPP/IRB institution should be prepared to support the infrastructure (e.g., technology, software, communication platform, security, encryption, internet connectivity) necessary for all IRB members to access and do their work. This is particularly important for non-affiliated members who may not benefit from easy access to institutional resources as compared to affiliated members. To ensure participation, members should be provided reasonable accommodations to support access.

### Support for IRB Members: Institutional Affiliates

How an affiliated member is recognized for their effort and time on the IRB will vary by institution and should be defined by the institution's Human Research Protection Program (HRPP) with consideration of equivalence for similar responsibilities. For employees, or members affiliated with the institution, some form of institutional contribution such as teaching, research, and service is an expectation of employment; IRB membership may fulfill such a requirement. The contribution of time via IRB membership is viewed as dedicated institutional citizenship but can nevertheless be recognized by a periodic letter of appreciation to the department chair or manager. Acknowledgment of members' commitment may be supported by other means such as a stipend, portion of base salary, and/or some other type of formal recognition (i.e., IRB member of the month). For example, some non-academic institutions may want to compensate their affiliated members financially for their time and effort outside of their normal institutional responsibilities, in which case a stipend or percent of salary for their roles (e.g., IRB chair, IRB member) could be considered. For academic institutions, acknowledgement of membership may take the form of research or scholarship credit, or the fulfillment of a service requirement, for members' time and effort.

### Support for IRB Members: Non-Institutional Affiliates

Community and other unaffiliated individuals who volunteer to be members of IRB committees should be recognized and acknowledged for their time and service. Unaffiliated members are

necessary representatives on the IRB<sup>1 2</sup> and provide the opportunity for IRBs to include individuals from the community from which the participant population may be drawn. Acknowledging and/or providing support to unaffiliated members may enable individuals to participate in an IRB more easily: computers, software, technical support, security, and internet access (and potentially cellular data plan) should be provided if needed, and compensation or a stipend will help acknowledge the time commitment, potential loss of work hours, preparation for and attendance of IRB meetings, and, when in person, travel costs to an IRB meeting. This type of support may help IRBs achieve the "...diversity of members, including consideration of race, gender, cultural backgrounds and sensitivity to such issues as community attitudes..."<sup>3</sup> that is a regulatory expectation.

### *Recommendation*

We recommend that the institutional Human Research Protection Program (HRPP) develop a policy or standard operating procedure to establish committee member responsibilities and the approved forms of recognition for affiliated- and non-affiliated members' contributions to the institution.<sup>4</sup> The policy/SOP should be applied consistently. Committee members should understand that compensation may have tax implications and should seek tax advice from professional advisors. Independent of considerations and expectations for institutional employees, non-affiliated members are often provided an honorarium for preparing and attending committee meetings. Regardless of how members are recognized, all members should have or be provided support and access to the tools and infrastructure needed to perform their responsibilities.

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<sup>1</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/institutional-review-boards-frequently-asked-questions#IRBMember>

<sup>2</sup> 45 CFR 46.107(c) IRB Membership that states "(c) Each IRB shall include at least one member who is not otherwise affiliated with the institution and who is not part of the immediate family of a person who is affiliated with the institution.

<sup>3</sup> 21 CFR 56.107(a)

<sup>4</sup> For either type of member, FDA regulations do not preclude a member from being compensated for services rendered. They do, however, stipulate that payment to IRB members should not be related to or dependent upon a favorable decision.