

From: Kushel, Margot <margot.kushel@ucsf.edu>
Sent: Friday, November 8, 2024 12:02 PM
To: CHHS CPHS <CPHS@chhs.ca.gov>
Subject: Opposition to proposed CPHS fee structure

Dear CHHS Committee for the Protection of Human Subjects –

I write to oppose your proposal to impose fees on CPHS applicants.

IRBs typically only impose fees on private industry, not on academic researchers. These fees will have the effect of discouraging under-resourced researchers from using valuable state administrative datasets and limiting access to research from all but the best-resourced researchers. As a senior academic researcher who has devoted much of my career to diversifying the research workforce, I am well aware about how seemingly innocuous fee structures will limit access to research to all but senior researchers from well-resourced R1 universities. The proposed fee structure will have the (unintended) consequence of severely narrowing our research pipelines and discouraging talented young researchers (particularly those from backgrounds most underrepresented in research) from making key contributions to our knowledge base, and further, from removing their ability to develop into senior researchers. This decision is even less defensible when one considers that by your own analysis, the fees would largely go to the costs of collecting the fees themselves. This is a true lose-lose proposal, which will narrow research pipelines to exactly the types of research and researchers California needs AND not lead to new revenue resources.

I ask you to reconsider this decision, in recognition of the enormous harm it will cause.

Sincerely,

Margot Kushel

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For scheduling issues, please cc Ms. Sonja Simmons Sonja.Simmons@ucsf.edu*

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