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Sent: Monday, July 29, 2024, 11:18 AM
To: Rykaczewska, Agnieszka@CDII <Agnieszka.Rykaczewska@CHHS.CA.GOV>
Subject: RE: Reminder: Request for materials

I envision in regs establishing a two-tiered review system.

- (1) We note that for data only projects not being merged with data from other agencies or entities, can be reviewed through expedited decision based on the current IPA analysis under Statute. However, board members reviewing expedited decisions on IPA data only review, have the discretion to seek full board review.
- (2) For data only projects that would merge with data from other agencies or entities, we require those projects to go through a full board review.

As for different criteria, beyond the IPA, on the merged data only projects, I'm thinking we could note in regs, we need other IRB approvals, etc. I haven't gone this far! Still thinking.

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