



October 25, 2024

Dear CHHS Committee for the Protection of Human Subjects,

We are writing to express our concerns over the latest draft of proposed regulations under the Information Practices Act related to the use of administrative data in research. We represent the leadership of J-PAL North America (Abdul Latif Jameel Poverty Action Lab), a research center at MIT that conducts rigorous research to improve public policy. J-PAL's research is conducted by a network of several hundred [academic researchers](#) across 120 universities, all of whom have experience in evaluating the impact of real-world programs and policies. Our co-founders, Abhijit Banerjee and Esther Duflo, were awarded the Nobel Prize in Economic Sciences for their groundbreaking scientific approach to poverty alleviation.

To date, our research center has supported nearly 200 research projects in the United States, with numerous projects in California. For example, we (Dr. Amy Finkelstein and Dr. Matt Notowidigdo) are running a randomized evaluation of high-quality training for consumer-directed home health workers to understand its impacts on health outcomes for care consumers and employment outcomes for care workers. Our research network conducts many important evaluations in California to answer critical policy questions: E.g., What impact do cash transfers have on maternal and child outcomes? What impact do shallow rental subsidies have on housing and economic outcomes for low-income seniors? How does pre-arrest legal representation impact criminal case outcomes?

Administrative data is a key and necessary component for such research that aims to help us understand the impact of public policies and programs. It is the foundation of rigorous policy research, analogous to how physicians rely on blood tests and imaging techniques to be able to treat patients. Recent studies using administrative data show, for instance, how behavioral factors can lead to decision biases, and how these biases can be addressed with better policy design. Improved ways of presenting information have been shown to significantly raise eligible earned-income tax credit (EITC) benefits claims and reduce uptake of costly payday loans. New experimental research has also contributed to the credible assessment of the long-run effects of landmark social programs, such as the effects of Medicaid health insurance. Such studies have helped significantly improve the design and performance of major public policies and programs. These policy changes, stemming from rigorous research utilizing administrative data, have improved lives on a significant scale.

For this reason, we are concerned with proposed regulations that impede the use of administrative data in research. For example, there has been a suggestion that research utilizing administrative data should require that individual consent be obtained retroactively. This is against the spirit of the Common Rule, which makes clear that research utilizing pre-existing data should not be subject to the same level of scrutiny because it does not involve direct interaction with human subjects. Furthermore, obtaining individual consent at the time of data



collection is not feasible under many circumstances - for example, it would not be feasible to obtain individual consent for newborns on a study that aims to measure the impact of conditional cash transfers on newborn outcomes.

Furthermore, J-PAL's research network has long been guided by a commitment to the Belmont Principles, the set of ethical principles and guidelines for research involving human subjects that informs how IRBs should approach their reviews. The Belmont Report 1978 lays down the foundation of ethical research using three key principles: 1) Respect for Persons: people's right to make their own decisions must be respected; 2) Beneficence: researchers should seek to increase wellbeing, and avoid knowingly doing harm; 3) Justice: there should be fairness in the allocation of risks and benefits between different groups of people.

These three principles, which position research as a tool to improve people's lives, are central in how J-PAL's academic network conducts its research. The Belmont Principles are the foundation of our organization-wide research protocols, as well as the protocols for individual research studies. In practice, this involves training and certifying all staff directly involved in research in best practices for working with human subjects, review of all planned research activities by independent institutional review boards, and following [global standards of research transparency](#). We—and our research network—take our commitment to data security, confidentiality, and privacy very seriously.

We strongly recommend CPHS to reconsider these proposed regulations.

Sincerely,

Amy Finkelstein
John & Jennie S. MacDonald Professor of Economics, MIT
Co-Scientific Director, J-PAL North America at MIT

Matt Notowidigdo
David McDaniel Keller Professor of Economics and Business, University of Chicago Booth
School of Business
Co-Scientific Director, J-PAL North America at MIT

Laura Feeney
Co-Executive Director, J-PAL North America at MIT

Vincent Quan
Co-Executive Director, J-PAL North America at MIT