

From: Paulette Cha <cha@ppic.org>
Sent: Thursday, October 3, 2024 5:11 PM
To: CHHS CPHS <CPHS@chhs.ca.gov>
Subject: Public Comment on CPHS Proposed Regulations Change

Dear CHHS Committee for the Protection of Human Subjects:

I am writing to express my concern and opposition to the proposed regulations that the Committee is exploring.

I am a research fellow at the Public Policy Institute of California who conducts research on health insurance and health care use among underserved Californians. Pre-existing administrative data such as the discharge files produced by HCAI are essential to my research.

I oppose the current draft regulations because they would shut down valuable research in the public interest using questionable authority under the IPA. The new rules would turn IPA reviews into IRB reviews even though IRB reviews are already required for such projects at our Institute, and the new rules exceed the standards normally applied under the Common Rule.

Thank you for taking public comment on this important topic.

Sincerely,
Paulette Cha

Paulette Cha
Research Fellow
she / her

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