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December 5, 2024

Dr. Darci Delgado, PsyD
Interim Chair, Committee for the Protection of Human Subjects
Assistant Secretary, California Health and Human Services
Agency 1215 O Street, 11th Floor.
Sacramento, CA 95814

RE: Public Comment on Suggested Framework for Additional IPA Review Criteria

Dear Interim Chair Delgado:

We write to you on behalf of the California State University to express support for and alignment with the comments submitted by the University of California (UC) system regarding the suggested framework for additional Information Practices Act (IPA) review criteria developed by the Committee for the Protection of Human Subjects (CPHS) Subcommittee.

As an institution committed to advancing research and experiential learning that benefits Californians, we share UC's concerns regarding the suggested framework and echo their recommendations. The California State University relies heavily on access to state-managed data to conduct critical research addressing issues such as public health and education. We, too, are deeply invested in ensuring research participant privacy while maintaining the ability to conduct meaningful research.

1) Concerns on Suggested Framework for Additional IPA Review Criteria

We concur with UC's assertion that the proposed framework may inadvertently hinder vital research efforts. The overlapping roles of CPHS and institutional IRBs could lead to confusion and conflicting regulatory interpretations. Specifically, we are concerned about:

1. The potential for duplicative and incongruent reviews, which could delay or prevent the initiation of critical research projects.
2. The impracticality of requiring retroactive individual consent in some research scenarios,

which would make certain studies infeasible and undermine the careful balance already struck by legislative statutes between privacy and the societal value of research.

II) Recommended Actions CPHS Can Take to Safeguard Data in Accordance with the IPA

We support UC's recommendation that CPHS develop a researcher-facing checklist to clarify appropriate technical safeguards for compliance with the IPA. A clear and practical resource would enhance understanding and streamline compliance without impeding research progress.

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The California State University stands ready to assist CPHS in crafting these resources and is committed to supporting efforts that protect research participants while ensuring the continuation of impactful research.

Thank you for the opportunity to provide feedback on this important matter. Should CPHS require further input from our institution, we are happy to engage further.

Sincerely,

Ganesh Raman, AVC Research

Melissa Mullen, Director of Sponsored Programs