

Potential amendments to final section of Suggested Framework for Additional IPA Review Criteria (Seventh Draft):

“Applications to CPHS for an IPA review shall include the following information, ~~to the extent it is available to the researcher:~~

If available *and if data is to be linked with other sources*, the researcher will provide a copy of the Notice of Privacy Practices (NPP) that would ordinarily be provided to individuals whose data is being collected and/or a description of the procedure for providing the individuals with the NPP for all of the data included in the study.

Information about which of the risks enumerated above are applicable in the research, and steps taken to minimize those risks.”

Motion 1: Ms. Kurtural makes a motion that the subcommittee take the text above back to the full board for review and recommendations. Further, the subcommittee will take the following questions to the full board:

1. Do we want to restrict requests for NPP documents and description of procedure to only studies that propose to link data from multiple data sources or
2. Do we want to include requests for NPP documents and description of procedure to all studies reviewed under the IPA? or
3. Do we want to have the NPP and description of procedures only for studies meeting one of the risk criteria enumerated in the document?

The subcommittee plan to meet on January 10th.