



UNIVERSITY OF CALIFORNIA MERCED  
PUBLIC HEALTH DEPARTMENT  
SCHOOL OF SOCIAL SCIENCES, HUMANITIES, AND ARTS  
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March 6, 2025

Dear CHHS Committee for the Protection of Human Subjects,

I'm writing to express my opposition to the proposed regulations that the Committee is exploring.

I am an Associate Professor at the University of California, Merced, and for the past 8 years I have conducted research on the determinants and outcomes of suicidal behavior, substance abuse, and other mental and behavioral health problems using California's HCAI and death record datasets. My work has been used to inform health care policy and programs around suicidal patients and other vulnerable populations. Pre-existing administrative data, including linked administrative data, are essential to my research.

I oppose the current draft of the regulations because they would shut down valuable research using questionable authority under the IPA. The new rules attempt to turn IPA reviews into an IRB review, but IRB reviews are already required for such projects – I routinely seek, and receive, approval for my research from my campus' IRB committee. The new rules exceed even the standards normally applied under the Common Rule.

Moreover, while I understand the need to generate more revenue for the state, the proposed costs for CPHS applications would be extremely prohibitive, especially for junior researchers. It will undoubtedly have the long-term effect of decreasing research conducted on California populations – including in the under-served and under-resourced Central Valley – to the detriment of their overall health and well-being.

Please do not try to fix what isn't broken.

Sincerely,

A handwritten signature in cursive script that reads "Sidra Goldman-Mellor".

Sidra Goldman-Mellor, Ph.D., M.P.H.  
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University of California, Merced  
Merced, CA 95340