



PUBLIC HEALTH DEPARTMENT

UNIVERSITY OF CALIFORNIA MERCED  
PUBLIC HEALTH DEPARTMENT  
SCHOOL OF SOCIAL SCIENCES, HUMANITIES, AND ARTS  
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To: California Health and Human Services Agency (CHHSA)/CPHS Administrators  
From: Asa Bradman, Professor and Chair, Public Health, University of California, Merced  
RE: Proposed access and fees for CPHS applicants  
Date: 12/4/2024

I am writing on behalf of the Department of Public Health at the University of California, Merced to ask that CHHS and CPHS rescind the current proposal to increase fees and limit access to de-identified health-related data.

As a faculty member of a department and university dedicated to serving a region plagued by serious health disparities, access to state-managed health information resources is crucial to develop deeper understanding about the determinants of poorer health outcomes and inform policies to reduce these disparities and improve public health. The information also provides key research and training opportunities for our diverse students to develop Master's and Ph.D. level projects so they can develop the knowledge and skills necessary to complete their education and serve our region and the state as a whole. Helping diversify the public health workforce in California is also a key objective of our program and access to high quality health information is a key resource needed to accomplish this goal.

As you know, the Common Rule provides exemptions for use of pre-existing data. Federal and state legislatures have considered these issues and the substantial benefits of research using pre-existing data and have provided guidelines for CPHS to follow that are compliant with Common Rule criteria and protect individual participants.

Of particular concern to our department is the proposed fee schedule which will create significant barriers to accessing the information for our faculty and students. The proposed fees will severely limit research opportunities and discourage our talented young researchers from making key contributions to the public health knowledge base and their ability to develop into senior researchers - exactly the type of public health professionals that our region and California needs.

Please feel free to contact me if you need more information

Sincerely,

A handwritten signature in blue ink that reads "Asa Bradman".

Asa Bradman, Ph.D.  
Professor and Chair, Department of Public Health  
University of California, Merced  
[abradman@ucmerced.edu](mailto:abradman@ucmerced.edu)

cc: Dr. Joaquin Arambula, California State Assembly District 31