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**Sent:** Friday, March 7, 2025 6:47 AM

**To:** CHHS CPHS <CPHS@chhs.ca.gov>

**Subject:** Concerns with CalHHS CPHS

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

I am an Assistant Professor of Epidemiology at the New York University Grossman School of Medicine. My research focuses on the influence of social, economic, and physical characteristics of communities on health, and how policies can shift these characteristics to improve population health and reduce racial, ethnic, and socioeconomic health inequities. The goal of this research is to identify policies that address structural determinants of health to effectively reduce violent injury and the adverse health effects of alcohol and drugs. A majority of my work focuses on the California population and leverages California-based data. Pre-existing administrative data, including emergency department discharge records, hospital discharge records, death records, birth records, are absolutely essential to my research. I currently hold two large research grants, one funded by the CDC and one funded by the NIH, that rely on California's existing health-related administrative data. Without these data, I will be unable to complete these projects, which are recognized by national agencies to be important for advancing population health and health equity.

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, and the new rules exceed even the standards normally applied under the Common Rule.

Please do not try to fix what isn't broken, and please do not impose changes that would block important public health research from occurring.

Sincerely,

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