

From: Hsia, Renee <Renee.Hsia@ucsf.edu>

Sent: Friday, February 28, 2025 9:51 AM

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

Subject: Public Comment on Proposed Regulations Affecting Research Access to Administrative Data

Dear Members of the CalHHS Committee for the Protection of Human Subjects,

My name is Dr. Renee Hsia, and I am a health services researcher and emergency medicine physician at the University of California San Francisco. My work relies on access to administrative data to understand critical issues in healthcare access, cost, and outcomes—research that ultimately informs policy and improves patient care. I am deeply concerned about the proposed regulations under the Information Practices Act that would significantly restrict researchers' ability to use pre-existing administrative data.

Administrative data are a cornerstone of health services research. They allow us to analyze disparities in care, evaluate emergency department utilization, and assess the impact of policy changes on vulnerable populations. If these regulations are enacted, they will not only hinder ongoing research in California but will set a troubling precedent for the nation, undermining evidence-based policymaking.

California has long been a leader in healthcare innovation and research. Restricting access to administrative data would not only compromise our ability to address pressing health inequities but would also discourage collaboration with national and international researchers who rely on California's robust datasets.

I urge the Committee to reconsider these regulations and work toward solutions that balance privacy protections with the public good that comes from rigorous, data-driven research.

Thank you for your time and consideration.

Sincerely,

Renée Hsia, MD, MSc

Professor, Department of Emergency Medicine

University of California, San Francisco

--

Renee Y. Hsia, MD, MSc

Professor & Vice Chair for Health Services Research, Department of Emergency Medicine

Attending Physician, San Francisco General Hospital and Trauma Center

Core Faculty Member, Philip R. Lee Institute for Health Policy Studies

University of California San Francisco

1001 Potrero Avenue, Building 5, Suite 6A

San Francisco, CA 94110

Email: renee.hsia@ucsf.edu

<https://profiles.ucsf.edu/renee.hsia>