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March 3, 2025

Dr. Catherine Hess, PhD  
Chair, Committee for the Protection of Human Subjects  
Assistant Secretary, California Health and Human Services Agency  
1215 O Street, 11<sup>th</sup> Floor  
Sacramento CA 95814

RE: Public Comment on Suggested Framework for Additional IPA Review  
Criteria

Dear Chair Hess,

The Public Policy Institute of California's mission is to produce independent, objective, nonpartisan research to build a brighter future for the state. Access to data is an essential part of our effort to work collaboratively with our data partners to answer important policy questions. Our systems and protocols protect sensitive data and comply with all state and federal laws. Additionally, we regularly review and update our policies and procedures in response to evolving threats and regulatory changes. We are committed to the proactive management of sensitive information and work with our data partners to ensure that we uphold the highest standards. Sincerely,

Our data stewardship has been recognized by our data partners and has allowed us to access sensitive administrative data from various state agencies, including agencies covered by CHPS. Access to specialized administrative data enables us to answer questions of key relevance to state administrative agencies, state policymakers, and stakeholders in a balanced, reliable way while protecting the privacy of individuals. Key examples of recent research we have been able to conduct with state administrative data span a wide range of policy topics. For example:

- In the summer 2024, we published an assessment of prisoner participation in rehabilitative programming using detailed administrative data from the California Department of Corrections and Rehabilitation to examine how the department has delivered on its rehabilitative mission.
- Last fall, we accessed detailed administrative data from the California Department of Social Services to draw lessons from a key emergency response to the COY ID-19 pandemic in CalFresh, the largest food assistance program in the state.
- Earlier this year, we released an analysis of dual enrollment in math-taking college courses while in high school-which can give students greater access to educational opportunity and eliminate longstanding inequities. This research

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relied on detailed administrative data from the California Community College Chancellor's office.

Severely constraining the ability of authorized researchers to access data for research purposes risks curtailing policymakers' understanding of how state investments and policy choices impact Californians and meet state objectives. We write to support the recommendation that CPHS develop a checklist that will ensure that researchers adhere to appropriate technical safeguards in accordance with the IPA instead of adding additional Information Practices Act (IPA) review criteria as developed by the Committee for the Protection of Human Subjects (CPHS) Subcommittee.

Sincerely,

A handwritten signature in blue ink that reads "Deborah Gonzalez". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

Deborah Gonzalez  
*Vice President of Government Affairs*  
*And Chief Data Officer*  
Public Policy Institute of California