

**MEMORANDUM TO INSTITUTIONAL REVIEW BOARDS /
HUMAN SUBJECTS REVIEW COMMITTEES**

TO: Institutional Review Boards / Human Subjects Review Committees

FROM: Narayan Sastry, Director, Displaced New Orleans Residents Survey

RE: Review of Proposals for Analysis of Restricted Data from the Displaced New Orleans Residents Survey

The Displaced New Orleans Residents Survey (DNORS) is an on-going study begun in 2009–2010 of individuals and families who lived in New Orleans at the time of Hurricane Katrina. DNORS makes available to researchers both Public Use Data, available to all researchers, and Restricted Data, available only under contract to researchers who meet rigorous conditions. Public Use Data have been sufficiently purged of identifying information that we believe they pose no significant threat to respondent anonymity. Restricted Data, on the other hand, contain information that the DNORS project believes significantly increases the risk of re-identification (deductive identification) of respondents.

It is because of this risk of re-identification of respondents that we request you to review portions of proposals to use Restricted Data from DNORS, and to do so using the same standards you would use for surveys of live human subjects conducted at your own institution. Although researchers using DNORS Restricted Data are conducting what is usually called "secondary data analysis", the increased risk of re-identification of DNORS respondents (who are, for DNORS, live human subjects) makes inappropriate the usual "Expedited Review" typically applied to such "secondary" analysis of anonymized data. The only circumstance in which an Expedited Review is acceptable is if there was a previous Full-Board Review of the same Restricted Data Protection Plan.

We request that you review specifically the Restricted Data Protection Plan, and those aspects of the Research Plan that deal with issues of respondent anonymity and data security. We ask for your review because you will be better able to judge the extent to which, in your institution's physical and computing environment, the plans are adequate to ensure respondent anonymity and limitation of access to the Restricted Data to the persons specified in the contract.

We are not asking that you review the DNORS project itself. That review has been done by the relevant oversight and review committees at RAND and the National Institute of Health, the primary funder of DNORS.

If you have any questions about the nature and scope of this request, please contact us.

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Certification of Human Subjects Review

Restricted Data Investigator:

Research proposal title:

As chairperson of the Institutional Review Board / Human Subjects Review Committee of the institution specified below, I certify that:

1. Our Institutional Review Board / Human Subjects Review Committee is has a current Federalwide Assurance Certificate or current accreditation by the Association for the Accreditation of Human research Protection Programs.
2. Our Institutional Review Board / Human Subjects Review Committee has reviewed, according to its standards and procedures for live human subjects, the RAND-approved Restricted Data Protection Plan (and those portions of the Research Plan that deal with respondent anonymity and data security) of the Restricted Data Investigator named above; and has approved those plans.
3. Our Institutional Review Board / Human Subjects Review Committee has completed a Full-Board Review of the Restricted Data Protection Plan or it has completed an Expedited Review based on a Full-Board Review of a previous application that used the same Restricted Data Protection Plan.

Signature Date

Name

Title

Telephone number

Institution

Fax number

Address

E-mail address

City State ZIP