SECONDARY ANALYSIS OF PUBLIC USE DATASETS

Background
Secondary analysis of publicly available data is a common method of research. One of the main sources of such data is the federal government (e.g., Bureau of Labor Statistics). Increasingly, federal agencies require investigators to make data collected with assistance of federal funds publicly available. In addition, many professional organizations and journals are establishing the norm that investigators make data sets used for the production of published scholarly papers accessible in public use data files to encourage scholarly replication of research.

Publicly available is defined as data that is accessible to the general public, not restricted to researchers. Public use datasets are prepared with the intent of making them available for public use. The data available to the public are not individually identifiable. In some cases, data may have both publicly available de-identified data and restricted use data. Restricted use data is not considered publicly available.

Description
The University of Utah IRB has determined that data in the datasets listed below has been stripped of identifiers and is publicly available. As a result, research using this data does not rise to the level of “human subjects research,” under the federal Common Rule, 45 CFR Part 46 and University policies, and, therefore, does not require IRB review. See, SOP 401a: Definition of Research Involving Human Subjects.

If a project will use a de-identified dataset that is not listed below, investigators are invited to submit an application for a determination of non-human subjects in ERICA, the University of Utah’s electronic submission system. Investigators may select “Create a New Study Application” in ERICA and then select “Request for Non-Human Subject Research Review”. The short application will be reviewed by the IRB staff and may request additional information or will make a determination that the project does not meet the definition of human subjects research.

Research projects that merge more than one dataset in such a way that individuals may be identified are not covered by this policy, and require prior IRB approval. Such proposals may be eligible for exempt determination. Investigators may submit a new study application for review.

Some of the databases listed below have restricted-use datasets that include identifiers, and therefore, must be approved by the University of Utah IRB before the research begins. Restricted use data are not publicly available and investigators must submit a new study application for review.

Research projects involving analysis of secondary data from the following datasets/repositories will NOT require prior IRB approval:

- Autism Brain Imaging Data Exchange (ABIDE)
- Better Access to Data for Global Interdisciplinary Research (BADGIR)
- Behavioral Risk Factor Surveillance System (BRFSS) Public-use datasets only
- Bureau of Labor Statistics Public-use data files only
- Demographic and Health Surveys (DHS)
- Fragile Families & Child Wellbeing Study
- Inter-University Consortium for Political and Social Research (ICPSR) Public-use datasets only
- Luxembourg Income Study Database and the Luxembourg Wealth Study Database

Please contact the IRB Office at (801) 581-3655 or irb@hsc.utah.edu for additional guidance.

IGS: Secondary Analysis of Public Use Datasets
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