

September 17, 2024

Dear CHHS Committee for the Protection of Human Subjects:

I appreciate your dedication to the Committee work, and I have great respect for this work. I'm writing to express my opposition to the proposed regulations that the Committee is exploring.

I am the Chair of the Public Policy Department and Distinguished Professor at UCLA. I conduct research on entrepreneurship, racial inequality, public policy, labor economics, and education. My research has been used in numerous public policy debates at both the federal level and state level. I have been asked to testify in front of the U.S. Senate, U.S. House of Representatives, and California State Assembly based on the findings of my research. I also regularly provide advice to the White House, Vice President's office, and the U.S. State Department.

Pre-existing administrative data are essential to my research. I use U.S. Census data to study business policy and racial inequality in several research projects. I also use California data on college students and credit use to study questions about financial aid, college going, and family debt. The findings will provide insights into state and federal debt relief and financial aid programs to help disadvantaged students graduate from college.

Faculty in my department also use California administrative data to study important questions with implications for policy. Their work has also provided insights into public policy debates.

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.

Given the value of these data to my research on numerous public policy questions please do not make these changes.

Sincerely,



Robert Fairlie
Distinguished Professor, Public Policy and Economics
UCLA