

## Memorandum to Institutional Review Boards/Human Subjects Review Committees

TO: Institutional Review Boards/Human Subjects Review Committees  
FR: Charles Brown, Principal Investigator, Director, Panel Study of Income Dynamics  
RE: Review of Proposals for Analysis of Panel Study of Income Dynamics Restricted Datasets

The Panel Study of Income Dynamics (PSID) is an ongoing longitudinal survey of American families primarily sponsored by the National Science Foundation and the National Institutes of Health. PSID makes available both unrestricted datasets, available to all researchers, and restricted datasets, available only under agreement to researchers who meet rigorous conditions. Unrestricted datasets have been sufficiently purged of identifying information that we believe they pose no significant threat to respondent anonymity. These files are public-use and are distributed via download from our website. Restricted datasets contain information that PSID, and/or the agencies that supplied us data with the permission of respondents, believes increases the potential risk of re-identification of study participants.

It is because of the potential risk of re-identification of participants that we request that you review portions of proposals to use restricted data from PSID, and to do so using the same standards you would use for surveys of live human subjects. Although researchers using PSID restricted datasets are conducting "secondary data analysis", the increased potential risk of re-identification of PSID study participants (who are, for PSID, live human subjects) makes inappropriate the usual "exemption" applied to "secondary analysis" of anonymized datasets.

*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, if any. 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, whether the Plans are adequate to ensure participant anonymity and limitation of access to the restricted data to the persons specified in the contract.*

We are **not** asking that you review the entire Panel Study of Income Dynamics. That review has been done by the relevant committees at the University of Michigan and the primary sponsors of PSID.

If you have any questions about the nature and scope of what we are asking, please feel free to contact:

Katherine McGonagle, Ph.D.  
Survey Research Center, Rm 3252  
Box 1248, 426 Thompson St.  
Ann Arbor, Michigan 48106-1248  
phone: 734-936-1773, fax: 734-936-3809  
email: [kmcgon@umich.edu](mailto:kmcgon@umich.edu)

## 2. Certification of Human Subjects Review

Restricted Data Investigator:

---

Title of Research Proposal:

---

---

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 meets requirements established by the Department of Health and Human Services for Multiple Project Assurances or Federal-Wide Assurances;
2. Our Institutional Review Board/Human Subjects Review Committee has reviewed, according to its standards and procedures for live human subjects, and approved, the Restricted Data Protection Plan (and those portions of the Research Plan that deal with respondent anonymity and data security, if any), approved by the Panel Study of Income Dynamics of the Restricted Data Investigator above; and has approved those plans.

---

Signature                      Date

---

Typed name

---

Title

---

Institution

---

Building address

---

Street address

---

City              State      ZIPCode

---

Phone

---

Email address