

## External Research Requests for City-Generated and Maintained Data: Overview

The Office of the Deputy Mayor for Health and Opportunity and its departments require departmental approval for external research requests. Each department that is contributing data to a project must provide authorization for the project.

Departments reporting to the Office of the Deputy Mayor for Health and Opportunity:

- Department of Behavioral Health and Intellectual disAbility Services (DBHIDS)
- Department of Human Services (DHS)
- Department of Public Health (DPH)
- Office of Supportive Housing (OSH)

All requests for data to conduct research involving human subjects will require a proposal review, department approval, IRB review<sup>1</sup> and approval, and a Data License Agreement (DLA) drafted and executed by the Law Department for the City of Philadelphia. If the data request incorporates human subject data from the Department of Public Health or the Department of Behavioral Health and Intellectual disAbility Services, the research project must be submitted to the Philadelphia Department of Public Health Institutional Review Board (IRB).

- The City of Philadelphia defines human subject data as all data that is maintained as a client-level record. This includes both identified and de-identified client-level information. If you have a research request for data maintained by the City aggregated at a level higher than the client level and in a manner that does not permit for re-identification of individuals, please contact the department for protocols for accessing the data.
- All state and federal laws regarding research and the use of data must be observed
- The transfer of data must be in alignment with the DLA, and data should only be transferred using secure protocols (secure file transfer protocol, encryption, password protection, etc). The investigator is required to destroy the data or maintain the data as outlined in the DLA.
- The investigator must notify the City, in writing, of any intent to submit a report or an article for publication or to present the data in a public forum. See attached list of department contacts.
- A copy of all final study documents must be provided to the City. Researchers may be asked to present findings to City staff. See attached list of department contacts.
- Reports or articles written based on the approved research project must include the following statement: ***Opinions contained in this report reflect the opinions of the author and do not necessarily reflect those of the City of Philadelphia***

The City will assist with the transfer of data. The City is not required to integrate data sets from multiple source systems. The City is not required to support the project through data validation, application of

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<sup>1</sup> All research requests involving human subjects data maintained by the Department of Public Health (DPH) and the Department of Behavioral Health and Intellectual disAbility Services (DBHIDS) must be reviewed by the Department of Public Health (DPH) Institutional Review Board (IRB). At the discretion of the Deputy Mayor for Health and Opportunity or their designee, research requests involving human subjects data maintained by the Office of Supportive Housing (OSH) or the Department of Human Services (DHS) may be directed to the DPH IRB.

research methods, or the development of findings. The City maintains the right to decline a proposal if the request requires a substantial amount of city resources to fulfill the request.

### **External Research Requests for City-Generated and Maintained Data: Review Process**

The process requires departmental approval of the project concept to proceed. If assistance is needed to determine the involved departments, please contact the Deputy Mayor's Office for Health & Opportunity. If the proposed project requires data from more than one department, the Director for Policy and Evaluation in the Office of the Deputy Mayor for Health and Opportunity will coordinate the process across the departments.

#### Department of Behavioral Health and Intellectual disAbility Services (DBHIDS) and Department of Public Health (DPH)

This process should also be followed for any research projects involving human subjects initiated through OSH or DHS that include DBHIDS or DPH data.

1. Review the DPH IRB instructions for submitting a proposal for review (<http://www.phila.gov/health/Commissioner/IRB.html>). All research requests for data at the client level must be reviewed by the IRB, even if the data request is for de-identified data<sup>2</sup>. If the investigator is requesting de-identified data, the proposal should clearly identify that the request is for de-identified data and who from the participating city agency(s) will perform the de-identification procedures. If you have any additional questions regarding submission requirements, please contact [Candace.Adams@phila.gov](mailto:Candace.Adams@phila.gov).
2. Following the guidance provided on the DPH website, submit a complete proposal to the DPH IRB for review. The IRB will review the proposal and contact the investigator if additional information is needed.
3. Concurrently with Step 2, submit a copy of the proposal to the contact(s) for the agency(s) that will provide data for the study. See attached list of contacts to find the appropriate contact information for your proposal.
4. The data contributing agency(s) will evaluate the proposal and provide a written response to the investigator indicating if the proposal has been approved or not with an explanation as to why the proposal has not been approved. If the project is approved, the data contributing agency(s) will submit documentation of the approval to the IRB.
5. The IRB will notify the investigator, the data contributing agency(s), and the Law Department of its decision to approve or not approve the project by sending a copy of the approval letter. If the project involves multiple data contributing departments, a copy of the approval should also be submitted to the Director of Policy and Evaluation in the Office of the Deputy Mayor for Health and Opportunity.
6. The data contributing department will contact the Law Department and the investigator to develop and execute the DLA. The data contributing department will need to send the formal project title, the IRB approval letter, the project scope, a list of data elements that will be shared, the proposed term, and a department contact for the project. The executed agreement will be sent to the investigator, the data contributing agency(s), and the IRB. If the project involves multiple data

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<sup>2</sup> If individually identifiable information is requested by the investigator, and the data is subject to HIPAA rules, the IRB approval must include a waiver of the HIPAA requirement that a signed authorization must be obtained.

contributing departments, the Director of Policy and Evaluation for the Office of the Deputy Mayor for Health and Opportunity will contact the Law Department and the investigator to develop and execute the DLA.

7. Upon IRB approval and completion of a DLA, the following information will be sent electronically by the department to the Office of the Deputy Mayor for Health and Opportunity:
  - a. The project name as referenced in the IRB application
  - b. The name and contact information for the principal investigator
  - c. The department approval
  - d. The approved proposal and the approval letter from the IRB
  - e. The executed DLA

#### Office of Supportive Housing (OSH) and the Department of Human Services (DHS)

Note: If the proposed research study includes data from the DBHIDS or the DPH, the review process as outlined above for DBHIDS and DPH must be followed.

1. Submit a copy of the proposal to OSH or DHS. See attached list of contacts for the appropriate contact for OSH or DHS.
2. OSH or DHS will evaluate the proposal and provide a written response indicating if the proposal has been approved or not with an explanation of any disapproval to the investigator. If the proposal is approved by the OSH or DHS, and the investigator is requesting de-identified data, the investigator and the participating city agency should modify the proposal, if necessary, to identify that the request is for de-identified data and who from the participating city agency(s) will perform the de-identification procedures prior to submission of the proposal to the home institution IRB.
3. Upon receiving a letter of support from OSH or DHS, the investigator(s) should submit the required documentation to their home institution IRB for review. All research requests for data at the client level must be reviewed by an IRB, even if the data request is for de-identified data<sup>3</sup>. At the discretion of the Deputy Mayor for Health and Opportunity or their designee, research requests involving human subjects data maintained by OSH or DHS may be directed to the DPH IRB for review. If you are directed to the DPH IRB, please follow the review process guidance provided for DBHIDS and DPH.
4. If the study is approved by the investigator's home institution IRB, a copy of the letter of approval and the final proposal must be forwarded to OSH or DHS and the PDPH IRB. A reliance agreement between DPH IRB and the home institution IRB must be in place before the research can commence. Please contact [Judith.SamansDunn@Phila.Gov](mailto:Judith.SamansDunn@Phila.Gov)
5. For DHS research projects, DHS is required to submit the proposal to the Pennsylvania Department of Public Welfare (DPW) for approval.
6. Upon receiving confirmation of IRB approval, OSH or DHS will notify the Law Department to initiate work on a data license agreement and forward the IRB approval to the Law Department.

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<sup>3</sup> If individually identifiable information is requested by the investigator, the IRB approval must include a waiver of the HIPAA requirement that a signed authorization must be obtained.

7. The Law Department will contact the investigator and OSH or DHS to develop and execute the DLA. The executed agreement will be sent to the investigator and OSH or DHS. The data contributing department will need to send the formal project title, the home institution approval letter, the project scope, a list of data elements that will be shared, the proposed term, and a department contact for the project. The executed agreement will be sent to the investigator, the data contributing agency(s), and the IRB.
8. OSH or DHS is responsible for submitting the following information electronically to the Office of the Deputy Mayor for Health and Opportunity:
  - a. The project name as referenced in the IRB application
  - b. The name and contact information for the principal investigator
  - c. The department approval
  - d. The approved proposal and the approval letter from the IRB of the home institution
  - e. For DHS involved projects, DHS will provide documentation of the DPW approval
  - f. The executed DLA

## **External Research Requests for City-Generated and Maintained Data: Contact Information**

### **For any questions about the overall process:**

#### Office of the Deputy Mayor for Health and Opportunity

Name: James Moore  
Title: Director of Policy & Evaluation  
Phone Number: (215) 686-2158  
Email Address: james.moore@phila.gov

### **For questions about the Institutional Research Board**

#### Department of Public Health, Institutional Review Board

Name: Candace Adams  
Title: Administrative Assistant, IRB  
Phone Number: (215) 685-0856  
Email Address: [candace.adams@phila.gov](mailto:candace.adams@phila.gov)

### **For questions about Data License Agreements**

#### Law Department

Name: Mary Kate Bonner  
Title: Assistant City Solicitor, Commercial Law Unit  
Phone Number: (215) 683-5258  
Email Address: marykate.bonner@phila.gov

### **For department specific information needs, please contact:**

#### Department of Behavioral Health and Intellectual disAbility Services

Name: Cathy Bolton  
Title: Director of Continuous Quality Improvement  
Phone Number: (215) 413-7168  
Email Address: cathy.bolton@phila.gov

#### Department Of Human Services

Name: Cynthia Schneider  
Title: Deputy City Solicitor, Child Welfare Unit  
Phone Number: (215) 683-5137  
Email Address: cynthia.schneider@phila.gov

#### Department of Public Health

Name: Giridhar Mallya  
Title: Director of Policy & Planning  
Phone Number: (215) 686-5230  
Email Address: giridhar.mallya@phila.gov

#### Office of Supportive Housing

Name: Linda White  
Title: Executive Assistant for Administration  
Phone Number: (215) 686-6726  
Email Address: linda.white@phila.gov