

## NHATS-CMS Linked Files Memorandum

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### MEMORANDUM

**TO:** Institutional Review Boards/Human Subjects Review Committees

**FROM:** Jennifer Schrack, PhD, Principal Investigator, National Health and Aging Trends Study (NHATS)

**RE:** Review of Proposals for Analysis of NHATS Restricted Data

The National Health and Aging Trends Study (NHATS) is an ongoing longitudinal study of Americans ages 65 and older, sponsored by the National Institute on Aging (U01AG032947). The National Study of Caregiving periodically interviews caregivers of NHATS participants.

NHATS makes available to researchers both public use datasets, available to all researchers, and restricted datasets, available only under agreement to researchers who meet rigorous conditions. Public use datasets contain no identifying information and pose minimal risk of respondent identification. These files are distributed via download from our website ([www.nhats.org](http://www.nhats.org)); conditions of use require agreement by the user not to attempt to identify study participants. Restricted datasets contain information that NHATS believes increases the potential risk of identification of study participants.

Because of the potential risk of identification of participants, we request that you review portions of proposals to use restricted data from NHATS, and to do so using the same standards you would use for studies of live human subjects. Although researchers using NHATS restricted datasets are conducting "secondary data analysis", the increased potential risk for identification of NHATS study participants (who are, for NHATS, live human subjects) makes inappropriate the usual "exemption" applied to "secondary analysis" of anonymized datasets. We have attempted to minimize these risks by offering data through a secure virtual data enclave at the University of Michigan's Institute for Social Research. Nevertheless, the researcher is still responsible for adhering to a data security plan in order to ensure respondent confidentiality and privacy.

We are not asking that you review the entire National Health and Aging Trends Study. That review has been done by the relevant committees at the Johns Hopkins University and the National Institute on Aging, the primary sponsor of NHATS.

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

Jennifer Schrack, PhD, Principal Investigator  
National Health and Aging Trends Study  
Johns Hopkins University School of Public Health  
2024 E. Monument St., Suite 2-700  
Baltimore, MD 21205  
Phone: 410-502-9328  
Email: [jschrac1@jhu.edu](mailto:jschrac1@jhu.edu)