Atlanta Census Research Data Center
Policy Regarding IRB Approvals

It is the responsibility of the individual researchers undertaking approved research in the Atlanta Census Research Data Center (ACRDC) to assure that they are in compliance with the Internal Review Board (IRB) policies and requirements of their home institution.

Researchers are advised that if their research makes use of household or individual data, they should receive IRB approval from their home institution. Research making use of business data only are typically not required to obtain IRB approval since businesses are not human subjects.

It will likely be the case that projects undertaken in the RDC are exempt, under the following criteria:

EXEMPTION #4 of the 45 CFR 46.101.(b):
Research involving the collection or study of existing data, documents, records, pathological specimens, or diagnostic specimens, if these sources are publicly available or if the information is recorded by the investigator in such a manner that subjects cannot be identified, directly or through identifiers linked to the subjects.

While there are individual identifiers on the data in the RDC, the IRB should be made aware that all confidential data, project approval, access, security, and confidentiality protection are managed by the Census Bureau under U.S. Code Title 13, as separate law from the one that mandates IRB supervision. The Census Bureau only allows researchers to remove public use data from the RDC. Such data are completely anonymized and without any use restrictions. Therefore, the project would likely be determined to be exempt under IRB regulations.