Secondary analysis of data is using data that has already been collected to answer a research question.

If your research involves only the use of records or other data on living individuals, and no interaction, survey or observation of individuals, some of the questions on the Application for Approval will not apply.

In any case, your study still requires review by Northeastern University’s Office of Human Subject Research Protection (HSRP). However, it may qualify for an exemption (determined only by HSRP) if the following conditions are met:

1. the data is existing, i.e., the data has already been collected and is “on the shelf” at the time you write your protocol,

   AND

2. Either
   a. the data, documents, records are publicly available (e.g., city records),
   OR
   b. the data is recorded by the investigator in such a way that the subjects cannot be identified either directly or indirectly through identifiers linked to the subject

If you think your study may qualify for this exemption, complete the Request for Approval sections A – G and N. Then provide information about the source of your data to document how the above criteria have been met. If the source is not public, you will need written documentation from the site in most cases. HSRP will make the final determination if the study is exempt. Exemptions are not determined by the investigator.

If your study does not qualify for an exemption, complete the Request for Approval. Write n/a for sections that do not apply; K – N require response. Provide information about the source of the data, the purposes and means by which it was originally collected, identifying information that is used, and the means by which confidentiality is maintained by the current source and the means by which you will maintain confidentiality. You will need to provide written approval/permission from the site.

For example, if you want to use student records or medical records, you need written permission/IRB approval from the school or hospital. State exactly which records/information you want. Describe the identifiers currently on the records and the procedures you will be using to identify or de-identify the records.