

CDC Cancer Registry Data Access for Research Project

Cancer Registry Research Approval Process: Classification of States by Level of Approval Required

Updated February 2018



Definition of Terms

Approval process: The approval process for research requests for access to confidential data is specific to each state cancer registry. The approval process may require cancer registry, institutional review board (IRB) and/or regulatory group approvals.

Levels of approval: The levels of review for approval range from one to four or more levels of review that may include the cancer registry, affiliated IRB, and affiliated regulatory groups.

Sponsorship: Clarifies if sponsorship from a local epidemiologist or state-based researcher is required for any research request to access confidential data.

Committee: This term represents any regulatory body or group, board, or review group different from the IRB, from whom approval is required.

Epidemiologist: This term represents a cancer registry-affiliated epidemiologist.

Cancer registry IRB: This term represents an institutional review board affiliated with the cancer registry.

Level of complexity scale: The level of complexity for gaining approval to access confidential data is based on factors including the number of levels of approval, time frame for approval, pediatric special requirements, fees, sponsorship requirement, a limit on the number of studies allowed by the cancer registry or the IRB, and whether physician/patient authorization is required.

States That Require One Level of Approval

| State | One level of approval | Pediatric special requirements | Fee | Time frame (months) | Sponsorship required | Human subjects protection training required | Patient contact studies allowed | Physician/patient authorization by cancer registry | Physician notification/patient authorization by cancer registry | Physician/patient authorization by researcher | Limit on number of studies | Level of complexity |
|----------------------|-----------------------|--------------------------------|-----|---------------------|----------------------|---|---------------------------------|--|---|---|----------------------------|---------------------|
| Alaska | Committee | No | No | Varies | No | No | No | Not applicable | Not applicable | Not applicable | No | Less |
| Colorado | Cancer registry IRB | No | No | 2–6 | No | Yes | Yes | Physician | Physician | Not applicable | No | More |
| Connecticut | Cancer registry IRB | No | No | <2 | No | Yes | Yes | Not applicable | Not applicable | Physician | No | Middle |
| District of Columbia | Cancer registry IRB | No | No | <2 | No | No | Yes | Varies | Varies | Varies | No | Middle |
| Georgia | Cancer registry IRB | No | Yes | 2–3 | Yes | No | Yes | Physician and patient | Physician and patient | Not applicable | No | More |
| Idaho | Committee | Yes | Yes | <2 | No | No | Yes | Physician and patient | Physician and patient | Not applicable | No | More |
| Illinois | Cancer registry IRB | No | Yes | Varies | No | Yes | Yes | Patient | Not applicable | Not applicable | No | Middle |
| Indiana | Committee | No | No | <2 | No | No | Yes | Not applicable | Not applicable | Physician | No | Less |
| Kentucky | Committee | No | Yes | <2 | No | No | Yes | Patient | Not applicable | Not applicable | No | Less |
| Massachusetts | MDPH IRB | No | No | <2 | No | Yes | Yes | Patient | Not applicable | Not applicable | No | Less |
| Mississippi | Committee | No | Yes | <2 | No | No | Yes | Patient | Not applicable | Not applicable | No | Less |
| Nevada | Cancer registry IRB | No | Yes | 2–6 | No | No | Yes | Varies | Varies | Varies | No | More |
| Pennsylvania | Committee | No | Yes | <2 | No | No | Yes | Not applicable | Not applicable | Patient | No | Less |
| Wisconsin | Committee | No | Yes | Varies | No | No | Yes | Not applicable | Not applicable | Patient | No | Middle |

States That Require Two Levels of Approval (up to two levels of approval depending on the research)

| State | Two levels of approval | Pediatric special requirements | Fee | Time frame (months) | Sponsorship required | Human subjects protection training required | Patient contact studies allowed | Physician/patient authorization by cancer registry | Physician notification/patient authorization by cancer registry | Physician/patient authorization by researcher | Limit on number of studies | Level of complexity |
|-----------|--|--|---|---------------------|----------------------|--|---------------------------------|--|---|---|----------------------------|---------------------|
| Alabama | <ul style="list-style-type: none"> Advisory council Cancer registry IRB | Yes | Yes | Varies | No | No | Yes | Physician | Physician | Not applicable | Yes | Middle |
| Arizona | <ul style="list-style-type: none"> Committee Cancer registry IRB | No | No | Varies | No | No | Yes | Not applicable | Not applicable | Physician | No | Middle |
| Florida | <ul style="list-style-type: none"> Committee Cancer registry IRB | No | Yes | <2 | No | Yes | Yes | Not applicable | Not applicable | Patient | No | Less |
| Hawaii | <ul style="list-style-type: none"> Committee Cancer registry IRB | No | Yes | <2 | Yes | Yes | Yes | Patient | Not applicable | Not applicable | No | More |
| Louisiana | <ul style="list-style-type: none"> Committee Cancer registry IRB | No | Yes | <2 | No | Yes | Yes | No | Yes | Yes | Yes | More |
| Maine | <ul style="list-style-type: none"> Cancer registry director Cancer registry IRB | No | Yes | 2–6 | No | Yes | Yes | Not applicable | Not applicable | Physician | No | More |
| Minnesota | <ul style="list-style-type: none"> Peer review committee (after registry staff review to ensure compliance with legal requirements) Commissioner | Yes, insofar as involvement of children elevates scrutiny; no specific requirement | No app. fee; cost recovery for work if approved | 2–6 | Yes | No, but approval by researcher's IRB is required | Yes | Physician and patient (in-state researchers can contact patients after physician permission) | Not applicable | Not applicable | No | More |
| Montana | <ul style="list-style-type: none"> Cancer registry committee Legal counsel | No | No | <2 | No | No | Yes | Not applicable | Not applicable | Patient | No | Less |

| State | Two levels of approval | Pediatric special requirements | Fee | Time frame (months) | Sponsorship required | Human subjects protection training required | Patient contact studies allowed | Physician/patient authorization by cancer registry | Physician notification/patient authorization by cancer registry | Physician/patient authorization by researcher | Limit on number of studies | Level of complexity |
|---------------|--|--------------------------------|-----|---------------------|----------------------|---|---------------------------------|--|---|---|----------------------------|---------------------|
| New Hampshire | <ul style="list-style-type: none"> Committee Cancer registry IRB | Yes | No | <2 | No | No | Yes | Not applicable | Not applicable | Physician | No | More |
| New Jersey | <ul style="list-style-type: none"> Committee Cancer registry IRB | No | Yes | Varies | No | Yes | Yes | Patient | Not applicable | Not applicable | No | Middle |
| New Mexico | <ul style="list-style-type: none"> Cancer registry director Cancer registry IRB | No | Yes | Varies | Yes | Yes | Yes | Physician and patient | Physician and patient | Not applicable | No | More |
| New York | <ul style="list-style-type: none"> Committee Cancer registry IRB | No | Yes | 2–6 | No | No | Yes | Not applicable | Physician and patient | Not applicable | No | Middle |
| North Dakota | <ul style="list-style-type: none"> Committee Committee | No | No | 2–6 | No | No | Yes | Varies | Varies | Varies | No | Middle |
| Ohio | <ul style="list-style-type: none"> Cancer registry Ohio Department of Health IRB | No | No | 2–6 | No | No | Yes | Not applicable | Not applicable | Physician | No | Middle |
| Rhode Island | <ul style="list-style-type: none"> Cancer registry director Health department IRB | Yes | No | 2–6 | No | No | Yes | Not applicable | Not applicable | Patient | No | More |
| Tennessee | <ul style="list-style-type: none"> Cancer registry director Cancer registry IRB | No | No | <4 | No | Yes | Yes | Patient | Not applicable | Not applicable | Yes | More |
| Utah | <ul style="list-style-type: none"> Investigator's institution's IRB Review committee | No | Yes | Varies | No | Yes | Yes | Patient | Not applicable | Not applicable | No | More |

| State | Two levels of approval | Pediatric special requirements | Fee | Time frame (months) | Sponsorship required | Human subjects protection training required | Patient contact studies allowed | Physician/patient authorization by cancer registry | Physician notification/patient authorization by cancer registry | Physician/patient authorization by researcher | Limit on number of studies | Level of complexity |
|---------------|--|--------------------------------|--------|---------------------|----------------------|---|---------------------------------|--|---|---|----------------------------|---------------------|
| Virginia | <ul style="list-style-type: none"> Health department IRB Commissioner | No | Varies | Varies | No | Yes | Varies | No | No | Varies | No | More |
| Washington | <ul style="list-style-type: none"> Cancer registry IRB Assistant secretary | No | No | Varies | No | No | Yes | Patient | Not applicable | Not applicable | No | Middle |
| West Virginia | <ul style="list-style-type: none"> Cancer registry director Committee | No | Yes | 2–6 | No | No | Yes | Varies | Varies | Varies | Yes | More |
| Wyoming | <ul style="list-style-type: none"> Committee Cancer registry IRB | Yes | No | <2 | No | No | Yes | Varies | Varies | Varies | No | More |

States That Require Three Levels of Approval (up to three levels of approval depending on the research)

| State | Three levels of approval | Pediatric special requirements | Fee | Time frame (months) | Sponsorship required | Human subjects protection training required | Patient contact studies allowed | Physician/patient authorization by cancer registry | Physician notification/patient authorization by cancer registry | Physician/patient authorization by researcher | Limit on number of studies | Level of complexity |
|----------------|--|--------------------------------|-----|---------------------|----------------------|---|---------------------------------|--|---|---|----------------------------|---------------------|
| Delaware | <ul style="list-style-type: none"> • Epidemiologist • Committee • Cancer registry IRB | No | No | 2–6 | No | No | Yes | Not applicable | Not applicable | Patient | No | Middle |
| Iowa | <ul style="list-style-type: none"> • Epidemiologist • Cancer registry IRB • Committee | Yes | Yes | <2 | No | Yes | Yes | Not applicable | Physician and patient | Not applicable | No | Less |
| Michigan | <ul style="list-style-type: none"> • Cancer registry IRB • Scientific committee • Dept. of health director | Yes | Yes | 2–6 | No | Yes | Yes | Physician and patient | Not applicable | Not applicable | No | More |
| Missouri | <ul style="list-style-type: none"> • Cancer registry senior statistician and staff • Cancer registry director • Dept. of health IRB | No | Yes | Varies | Yes | Yes | Yes | Patient | Not applicable | Not applicable | Yes | More |
| Nebraska | <ul style="list-style-type: none"> • Cancer registry director • Committee • Administrator | No | Yes | <2 | No | No | Yes | Patient | Not applicable | Not applicable | No | Less |
| North Carolina | <ul style="list-style-type: none"> • Cancer registry director • SCHS director • Committee chair | No | Yes | <2 | No | No | Yes | Physician | Physician | Patient | No | Less |

| State | Three levels of approval | Pediatric special requirements | Fee | Time frame (months) | Sponsorship required | Human subjects protection training required | Patient contact studies allowed | Physician/patient authorization by cancer registry | Physician notification/patient authorization by cancer registry | Physician/patient authorization by researcher | Limit on number of studies | Level of complexity |
|----------------|--|--------------------------------|-----|---------------------|----------------------|---|---------------------------------|--|---|---|----------------------------|---------------------|
| Oklahoma | <ul style="list-style-type: none"> • Cancer registry • Cancer registry IRB • Commissioner | No | Yes | 2–6 | No | Yes | Yes | Physician and patient | Not applicable | Not applicable | No | Middle |
| Oregon | <ul style="list-style-type: none"> • Cancer registry manager • Cancer registry advisory committee • Public health IRB | Yes | Yes | 2–6 | Yes | No | Yes | Physician and patient | Physician and patient | Not applicable | No | More |
| Puerto Rico | <ul style="list-style-type: none"> • Cancer registry director and coordinator • Cancer registry IRB • Committee | Yes | No | 2–6 | No | Yes | Yes | Not applicable | Not applicable | Physician | No | More |
| South Carolina | <ul style="list-style-type: none"> • Cancer registry • Committee • Department of Health IRB | No | Yes | 2–6 | Yes | Yes | Yes | Physician and patient | Physician and patient | Not applicable | No | Middle |
| South Dakota | <ul style="list-style-type: none"> • Cancer registry director • Cancer registry committee • Executive committee | No | Yes | <2 | No | No | Yes | Not applicable | Not applicable | Physician | No | Less |

| State | Three levels of approval | Pediatric special requirements | Fee | Time frame (months) | Sponsorship required | Human subjects protection training required | Patient contact studies allowed | Physician/patient authorization by cancer registry | Physician notification/patient authorization by cancer registry | Physician/patient authorization by researcher | Limit on number of studies | Level of complexity |
|----------------------------------|---|--------------------------------|-----|---------------------|----------------------|---|---------------------------------|--|---|---|----------------------------|---------------------|
| United States Pacific Islands | Specific Territory: <ul style="list-style-type: none"> • Cancer registry director • Committee Regional: <ul style="list-style-type: none"> • Official/local IRB • Cancer registry director • Committee | No | No | 2–6 | No | No | Yes | Not applicable | Not applicable | Physician | No | Middle |
| Vermont | <ul style="list-style-type: none"> • Cancer registry director • Committee • Cancer registry IRB | No | Yes | 2–6 | No | Yes | Yes | Physician and patient | Physician and patient | Not applicable | No | Middle |

States That Require Four Levels of Approval (up to four levels of approval depending on the research)

| State | Four levels of approval | Pediatric special requirements | Fee | Time frame (months) | Sponsorship required | Human subjects protection training required | Patient contact studies allowed | Physician/patient authorization by cancer registry | Physician notification/patient authorization by cancer registry | Physician/patient authorization by researcher | Limit on number of studies | Level of complexity |
|------------|--|--------------------------------|-----|---------------------|----------------------|---|---------------------------------|--|---|---|----------------------------|---------------------|
| Arkansas | <ul style="list-style-type: none"> Epidemiologist Committee State board of health Administration | No | Yes | 2–6 | No | No | Yes | Patient | Not applicable | Not applicable | No | Middle |
| California | <ul style="list-style-type: none"> Committee Epidemiologist Cancer registry IRB Cancer registry director | Yes | Yes | 2–6 | No | No | Yes | Not applicable | Not applicable | Patient | No | More |
| Kansas | <ul style="list-style-type: none"> Cancer registry director Cancer registry data release board University and/or state IRB Secretary of KDHE | No | Yes | Varies | Yes | Yes | Yes | Patient | Not applicable | Not applicable | No | Middle |
| Maryland | <ul style="list-style-type: none"> Cancer registry director Cancer registry officials Cancer registry IRB Secretary | No | No | Varies | No | No | Yes | Patient | Not applicable | Not applicable | No | Middle |
| Texas | <ul style="list-style-type: none"> Cancer registry manager Cancer registry IRB Committee Commissioner | No | No | 2–6 | No | Yes | Yes | Not applicable | Not applicable | Patient | No | More |

Level of Complexity by State Cancer Registry

| Less Complex Process | Middle Complex Process | More Complex Process |
|---|---|--|
| <ul style="list-style-type: none"> • Alaska • Florida • Indiana • Iowa • Kentucky • Massachusetts • Mississippi • Montana • Nebraska • North Carolina • Pennsylvania • South Dakota | <ul style="list-style-type: none"> • Arizona • Arkansas • Connecticut • Delaware • District of Columbia • Kansas • Maryland • New Jersey • New York • North Dakota • Ohio • Oklahoma • South Carolina • United States Pacific Islands • Vermont • Washington • Wisconsin | <ul style="list-style-type: none"> • Alabama • California • Colorado • Georgia • Hawaii • Idaho • Illinois • Louisiana • Maine • Michigan • Minnesota • Missouri • Nevada • New Hampshire • New Mexico • Oregon • Puerto Rico • Rhode Island • Tennessee • Texas • Utah • Virginia • West Virginia • Wyoming |

Appendix: Classification and Analysis Tables

Cancer registries' human subject protection policies and procedures classification category definitions

| Classification Category | Definition |
|--|---|
| 1. Requires initial cancer registry contact prior to application submission | How to initiate the data request process: clarifies if the researcher should contact the cancer registry representative or the IRB as a first step in the process. |
| 2. State cancer registry allows release of state residents' identifiable data to researchers | State cancer registry allows identifiable and confidential data to be released to researchers as long as the researcher meets all required state cancer registry-specific confidentiality requirements and obtains the necessary approvals. |
| 3. Requires sponsorship from local researcher | Clarifies if sponsorship from a local epidemiologist or state-based researcher is required. |
| 4. Requires cancer registry-specific human subject protection training | This section clarifies if the IRB of record or the cancer registry has specific human subject protection training requirements. |
| 5. Requires IRB approval from requested state and/or researcher's affiliated institution | Clarifies and identifies the number of IRBs that need to review and approve the research project. |
| 6. Special requirements for pediatric research | Clarifies if the state has special requirements for pediatric research. |
| 7. Patient contact, authorization, and consent required for release of confidential data | State-specific requirements for contacting patients and obtaining consent for research purposes. |
| 8. Detail and number of steps in the approval process | Identifies the number of regulatory bodies and process of review and approval required for research studies. Categories include one to four or more levels. |
| 9. Frequency of IRB and other regulatory committee meetings | Categories include weekly, monthly, quarterly, bi-monthly, semi-monthly, other, and unknown. |
| 10. Charges a fee | Provides information regarding the cost of a data request. |
| 11. Time frame for the approval process | The length of time generally required for data request processes and research approvals. |
| 12. Limit on number of studies | The number of active projects a researcher may have open with the cancer registry. |
| 13. Involvement of cancer registry director or senior official in approval process | Clarifies if cancer registry administrators and senior officers are involved in the research review and approval process. In general, involvement of cancer registry officials is considered a positive feature. |

1. Requires initial cancer registry contact prior to application submission

| No Initial Contact Required (7) | Initial Contact Required (48) |
|---|--|
| Arizona, California, Connecticut, Massachusetts, Nevada, North Carolina, Virginia | Alabama, Alaska, Arkansas, Colorado, Delaware, District of Columbia, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, New Hampshire, New Jersey, New Mexico, New York, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, U.S. Pacific Islands, Utah, Vermont, Washington, West Virginia, Wisconsin, Wyoming |

2. State cancer registry allows release of state residents' identifiable data to researchers

| Does Not Allow Release (0) | Allows Release (53) |
|----------------------------|--|
| None | Alabama, Alaska, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, District of Columbia, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, North Carolina, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, U.S. Pacific Islands, Utah, Vermont, Virginia, Washington, West Virginia, Wisconsin*, Wyoming |

*Wisconsin allows access to identifiable data under very strict circumstances.

3. Requires sponsorship from local researcher

| No Sponsorship Required (46) | Sponsorship Required (7) |
|---|--|
| Alabama, Alaska, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, District of Columbia, Florida, Idaho, Illinois, Indiana, Iowa, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Mississippi, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New York, North Carolina, North Dakota, Ohio, Oklahoma, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, U.S. Pacific Islands, Utah, Vermont, Virginia, Washington, Wisconsin, West Virginia, Wyoming | Georgia, Hawaii, Kansas, Minnesota, Missouri, New Mexico, Oregon |

4. Requires human subject protection training

| No Human Subject Protection Training Required (33) | Human Subject Protection Training Required (20) |
|---|--|
| Alabama, Alaska, Arizona, Arkansas, California, Delaware, District of Columbia, Georgia, Idaho, Illinois, Indiana, Kentucky, Maine, Maryland, Minnesota, Mississippi, Montana, Nebraska, Nevada, New Hampshire, New York, North Carolina, North Dakota, Ohio, Oregon, Pennsylvania, Rhode Island, South Dakota, U.S. Pacific Islands, Washington, West Virginia, Wisconsin, Wyoming | Colorado, Connecticut, Florida, Hawaii, Iowa, Kansas, Louisiana, Massachusetts, Michigan, Missouri, New Jersey, New Mexico, Oklahoma, Puerto Rico, South Carolina, Tennessee, Texas, Utah, Vermont, Virginia |

5. Requires IRB approval from requested state and/or researcher’s affiliated institution

| IRB Approval Requirement | Total | States |
|---|-------|---|
| IRB approvals from both researcher’s and registry-affiliated institution | 28 | Alabama, California, Connecticut, Delaware, District of Columbia, Illinois, Iowa, Kansas, Louisiana, Maine, Maryland, Massachusetts, Michigan, Missouri, New Hampshire, New Jersey, New Mexico, New York, Ohio, Oklahoma, Oregon, Puerto Rico, South Carolina, Tennessee, U.S. Pacific Islands, Vermont, Virginia, Washington |
| Only IRB approval from researcher-affiliated institution | 17 | Alaska, Arkansas, Idaho, Indiana, Kentucky, Minnesota, Mississippi, Montana, Nebraska, Nevada, North Carolina, North Dakota, Pennsylvania, South Dakota, Utah, West Virginia, Wisconsin |
| Only IRB approval from registry-affiliated institution | 6 | Arizona, Florida, Georgia, Rhode Island, Texas, Wyoming |
| IRB approval from registry-affiliated institution but information not available if IRB approval required from researcher-affiliated institution | 2 | Colorado, Hawaii |

6. Special requirements for pediatric research

| Special Requirements for Pediatric Research (11) | No Special Requirements for Pediatric Research (42) |
|--|---|
| Alabama, California, Idaho, Iowa, Michigan, Minnesota, New Hampshire, Oregon, Puerto Rico, Rhode Island, Wyoming | Alaska, Arizona, Arkansas, Colorado, Connecticut, Delaware, District of Columbia, Florida, Georgia, Hawaii, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Mississippi, Missouri, Montana, Nebraska, Nevada, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Pennsylvania, South Carolina, South Dakota, Tennessee, Texas, U.S. Pacific Islands, Utah, Vermont, Virginia, Washington, West Virginia, Wisconsin |

Notes: Alabama, Iowa, Rhode Island, and Utah require parental and/or physician consent.

Alaska, New Hampshire, Puerto Rico, and Utah have never handled pediatric study requests.

California, Michigan, Minnesota, Oregon, Utah, and Wyoming have a more difficult approval process or require more oversight.

Idaho requires a case-by-case review.

North Carolina prefers initial cancer registry contact prior to application submission to discuss data release charges to be included in the application.

Utah specifically does not have any special requirements for research involving children, but the IRB would have special requirements.

Virginia does not allow patient contact either directly or indirectly, through providers.

7. Patient contact, authorization, and consent required for release of confidential data

7a. Cancer registry requests authorization from physician and/or patient

| State-Specific Requirement for Requesting Authorization | Total | States |
|--|-------|---|
| Patient authorization required | 14 | Arkansas, Hawaii, Illinois, Kansas, Kentucky, Maryland, Massachusetts, Mississippi, Missouri, Nebraska, New Jersey, Tennessee, Utah, Washington |
| Both physician notification and patient authorization required (passive physician consent) | 9 | Georgia, Idaho, Iowa, Louisiana, New Mexico, New York, Oregon, South Carolina, Vermont |
| Both physician and patient authorization required (active physician consent) | 4 | Indiana, Michigan, Minnesota, Oklahoma |
| Physician notification required (passive consent) | 3 | Alabama, Colorado, North Carolina |
| Physician authorization required (active consent) | 1 | Alabama (pediatric) |

Notes: In Alabama, active physician consent is required for pediatric studies.

The Louisiana Tumor Registry (LTR) sends the notification letter to the physician first to check whether there are any medical reasons that we should not contact the patient. If the physician does not respond within two weeks, the LTR can contact patients.

In North Carolina, the registry must obtain passive physician consent when the research study is within one year of participant diagnosis.

In Washington, authorization may be waived by the IRB.

Virginia does not allow patient contact either directly or indirectly, through providers.

7b. Researcher requests authorization from physician and/or patient

| State-Specific Requirement for Requesting Authorization | Total | States |
|---|-------|---|
| Physician authorization required (active consent) | 8 | Connecticut, Indiana, Maine, New Hampshire, Ohio, Puerto Rico, South Dakota, U.S. Pacific Islands |
| Physician authorization required (passive consent) | 2 | Arizona, Louisiana |
| Patient authorization required | 8 | California, Delaware, Florida, Montana, North Carolina, Pennsylvania, Rhode Island, Texas |

Notes: Louisiana needs to inform physician first (provide physician with the researcher's name, institution and contact information). Then, LTR notifies the patient with his/her permission before giving his/her information to researcher.

Virginia does not allow patient contact either directly or indirectly, through providers.

7c. Who consents patient for participation in the study?

| State-Specific Requirement for Consenting Patients | Total | States |
|--|-------|---|
| Researcher contacts and consents | 40 | Alabama, Arizona, California, Colorado, Connecticut, Delaware, Florida, Georgia, Idaho, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, New Hampshire, New Mexico, New York, North Carolina, Ohio, Oklahoma, Oregon, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, U.S. Pacific Islands, Vermont, Wisconsin |
| Options on consent | 7 | District of Columbia, Iowa, North Dakota, New Jersey, Utah, Washington, Wyoming |
| Cancer registry contacts and consents | 2 | Arkansas, Hawaii |
| Strict conditions for patient contact studies | 2 | Nevada, West Virginia |
| No patient contact | 2 | Alaska, Virginia |

Notes: Delaware, Montana, Nevada, and West Virginia require the researcher to have prior informed consent from the patient.

Texas requires the researcher to send a courtesy note to the physician.

Virginia does not allow patient contact directly or indirectly, through providers.

8. Detail and number of steps in the approval process

8a. One level of approval

| State (14) | One Level of Approval |
|----------------------|--|
| Alaska | Alaska Cancer Registry Internal Review Committee |
| Colorado | Colorado Department of Public Health and Environment IRB |
| Connecticut | Connecticut Department of Public Health Human Investigations Committee IRB |
| District of Columbia | District of Columbia IRB for the Public Health |
| Georgia | Georgia Department of Public Health IRB |
| Idaho | Idaho Cancer Analysis Work Group |
| Illinois | Illinois Department of Public Health IRB |
| Indiana | Indiana State Cancer Registry Data Release Committee |
| Kentucky | Kentucky Cancer Registry Scientific Advisory Committee |
| Massachusetts | Massachusetts Department of Public Health IRB and Data Access Committee |
| Mississippi | Mississippi Cancer Registry Review Committee |
| Nevada | Nevada Central Cancer Registry IRB |
| Pennsylvania | Bureau of Health Statistics and Research |
| Wisconsin | Department of Health Services Data Governance Board |

8b. Two levels of approval (up to two levels of approval depending on the research)

| State (21) | Two Levels of Approval |
|---------------|--|
| Alabama | <ul style="list-style-type: none"> • Alabama Statewide Cancer Registry Advisory Council • Alabama Department of Public Health IRB |
| Arizona | <ul style="list-style-type: none"> • Arizona Cancer Registry Committee • Arizona Department of Health Services Human Subjects Review Board IRB |
| Florida | <ul style="list-style-type: none"> • Florida Cancer Registry Program (programmatic acknowledgement must be received prior to applying to the Florida DOH IRB) • Florida Department of Health IRB |
| Hawaii | <ul style="list-style-type: none"> • University of Hawaii Committee on Human Studies IRB • Commission on Cancer of the Hawaii Medical Association IRB |
| Louisiana | <ul style="list-style-type: none"> • Louisiana State University Health Sciences Center IRB • Institutional Bio-Safety Committee |
| Maine | <ul style="list-style-type: none"> • Maine Cancer Registry Director • Maine Center for Disease Control and Prevention, Department of Health and Human Services IRB |
| Minnesota | <ul style="list-style-type: none"> • Minnesota Cancer Surveillance System Administrative Review Group • Peer Review Committee |
| Montana | <ul style="list-style-type: none"> • Montana Central Tumor Registry Data Use Review Committee • Legal Counsel of the Department of Public Health and Human Services |
| New Hampshire | <ul style="list-style-type: none"> • Health Statistics and Data Management Data Review Committee • New Hampshire Department of Health and Human Services IRB |
| New Jersey | <ul style="list-style-type: none"> • Scientific Review Board of the Cancer Institute of New Jersey • University of Medicine and Dentistry of New Jersey IRB |
| New Mexico | <ul style="list-style-type: none"> • New Mexico Cancer Registry Principal Investigator • Human Research Review Committee |
| New York | <ul style="list-style-type: none"> • New York State Department of Health Administrative Approval • New York State Department of Health IRB |
| North Dakota | <ul style="list-style-type: none"> • North Dakota Department of Health HIPAA Privacy Office • North Dakota Department of Health Privacy Board |
| Ohio | <ul style="list-style-type: none"> • Ohio Cancer Incidence Surveillance System Data Group • Ohio Department of Health IRB |
| Rhode Island | <ul style="list-style-type: none"> • Rhode Island Cancer Registry Program Director • Rhode Island Department of Health IRB |
| Tennessee | <ul style="list-style-type: none"> • Tennessee Department of Health IRB • Tennessee Cancer Registry Director |
| Utah | <ul style="list-style-type: none"> • University of Utah IRB • Utah Cancer Registry Advisory Research Committee |
| Virginia | <ul style="list-style-type: none"> • Virginia Department of Health IRB • Virginia Department of Health Commissioner of Public Health |
| Washington | <ul style="list-style-type: none"> • Washington State IRB • Washington State Department of Health Assistant Secretary |
| West Virginia | <ul style="list-style-type: none"> • West Virginia Cancer Registry Director and West Virginia State Epidemiologist • Cancer Advisory Committee |

| State (21) | Two Levels of Approval |
|------------|--|
| Wyoming | <ul style="list-style-type: none"> • State Epidemiologist • Wyoming Department of Health IRB |

8c. Three levels of approval (up to three levels of approval depending on the research)

| State (13) | Three Levels of Approval |
|----------------------|--|
| Delaware | <ul style="list-style-type: none"> • Chronic Disease Epidemiologist • Delaware Division of Public Health Privacy Board • Delaware Human Subjects Review Board |
| Iowa | <ul style="list-style-type: none"> • Iowa Cancer Registry Epidemiologist • University of Iowa IRB • Iowa Department of Public Health |
| Michigan | <ul style="list-style-type: none"> • Michigan Department of Community Health IRB • Scientific Advisory Panel • Director of Department of Community Health |
| Missouri | <ul style="list-style-type: none"> • Missouri Cancer Registry and Research Center Review Committee • Vital Records Registrar • Missouri Department of Health and Senior Services IRB |
| Nebraska | <ul style="list-style-type: none"> • Nebraska Cancer Registry Program Director • Department of Health and Human Services Public Health Support Unit Administrator • Department of Health and Human Services Legal Department |
| North Carolina | <ul style="list-style-type: none"> • North Carolina Department of Health, Cancer Registry Director • North Carolina Department of Health, State Center for Health Statistics Director • North Carolina Department of Health, State Cancer Advisory Board |
| Oklahoma | <ul style="list-style-type: none"> • Oklahoma Central Cancer Registry • Oklahoma State Department of Health IRB • Commissioner of Health |
| Oregon | <ul style="list-style-type: none"> • Oregon Department of Human Services, Public Health IRB • Oregon State Cancer Registry Program Director • Oregon State Cancer Registry Advisory Committee |
| Puerto Rico | <ul style="list-style-type: none"> • Puerto Rico Cancer Registry Program Director and Coordinator of Analysis and Research Unit • University of Puerto Rico Medical Sciences Campus IRB • Puerto Rico Cancer Registry Advisory Committee |
| South Carolina | <ul style="list-style-type: none"> • Cancer registry • Committee • Department of Health IRB |
| South Dakota | <ul style="list-style-type: none"> • South Dakota Cancer Registry Program Director • A Committee of the South Dakota Cancer Registry • Executive Management (Secretary of Health and three division directors) |
| U.S. Pacific Islands | <p>If specific territory, up to three senior-level officials:</p> <ul style="list-style-type: none"> • Pacific Regional Central Cancer Registry Program Director • Senior-level ranking official • Local IRB <p>If regional level, two senior-level officials:</p> <ul style="list-style-type: none"> • Pacific Regional Central Cancer Registry Program Director • Pacific Islands Health Officers Association |
| Vermont | <ul style="list-style-type: none"> • Vermont Cancer Registry Program Chief • Vermont Department of Health Legal Department • Vermont Agency of Human Services IRB |

8d. Four or more levels of approval (up to four levels of approval depending on the research)

| State (5) | Four Levels of Approval |
|------------|---|
| Arkansas | <ul style="list-style-type: none"> • Chief Epidemiologist • Scientific Advisory Committee • State Board of Health • Administration (MOA required) |
| California | <ul style="list-style-type: none"> • Committee for the Protection of Human Subjects IRB • California Cancer Reporting and Epidemiologic Studies Research Program Director • Cancer registry IRB • California Department of Public Health Cancer Registry Director |
| Kansas | <ul style="list-style-type: none"> • Kansas Cancer Registry Director • Kansas Cancer Registry Data Release Board • University of Kansas Medical Center (KUMC) IRB and/or Kansas Department of Health and Environment (KDHE) IRB • Secretary, KDHE Protection |
| Maryland | <ul style="list-style-type: none"> • Maryland Cancer Registry Program Director • Three senior-level Department of Health and Mental Hygiene officials • Department of Health and Mental Hygiene IRB • Secretary of the Department of Health and Mental Hygiene |
| Texas | <ul style="list-style-type: none"> • Texas Cancer Registry Director • Texas Department of State Health Services IRB • Texas Department of State Health Services Executive Oversight Committee • Texas Department of State Health Services Commissioner |

9. Frequency of IRB and other regulatory committee meetings

| Frequency | Total | States |
|---------------|-------|---|
| Weekly | 1 | Iowa |
| Monthly | 15 | Arizona, Connecticut, District of Columbia, Georgia, Hawaii, Maryland, New Hampshire, Ohio, Oklahoma, Oregon, Tennessee, Texas, Vermont, Washington, Wyoming |
| Quarterly | 6 | Colorado, Kansas, Maine, South Carolina, Virginia, West Virginia |
| Bimonthly | 5 | California, Florida, New York, Massachusetts, Missouri |
| Semimonthly | 2 | Indiana, Puerto Rico |
| As needed | 2 | Alabama, Idaho |
| 5–6 per month | 1 | Utah |
| Unknown | 21 | Alaska, Arkansas, Delaware, Illinois, Kentucky, Louisiana, Michigan, Minnesota, Mississippi, Montana, Nebraska, Nevada, New Jersey, New Mexico, North Carolina, North Dakota, Pennsylvania, Rhode Island, South Dakota, U.S. Pacific Islands, Wisconsin |

10. Charges a fee

| No Fee (20) | Charges a Fee (33) |
|--|--|
| Alaska, Arizona, Colorado, Connecticut, Delaware, District of Columbia, Indiana, Maryland, Massachusetts, Montana, New Hampshire, North Dakota, Ohio, Puerto Rico, Rhode Island, Tennessee, Texas, U.S. Pacific Islands, Washington, Wyoming | Alabama, Arkansas, California, Florida, Georgia, Hawaii, Idaho, Illinois, Iowa, Kansas, Kentucky, Louisiana, Maine, Michigan, Minnesota, Mississippi, Missouri, Nebraska, Nevada, New Jersey, New Mexico, New York, North Carolina, Oklahoma, Oregon, Pennsylvania, South Carolina, South Dakota, Utah, Vermont, Virginia,* West Virginia, Wisconsin |

*Virginia may charge a fee, depending on the study.

11. Time frame for the approval process

| Time Frame | Total | States |
|------------|-------|---|
| <2 months | 19 | Connecticut, District of Columbia, Hawaii, Idaho, Indiana, Iowa, Kentucky, Louisiana, Massachusetts, Mississippi, Montana, Nebraska, New Hampshire, North Carolina, Pennsylvania, South Dakota, Wyoming |
| 2–6 months | 20 | Alabama, Arkansas, California, Colorado, Delaware, Georgia, Maine, Michigan, Minnesota, Nevada, New York, North Dakota, Ohio, Oklahoma, Oregon, Puerto Rico, Rhode Island, South Carolina, Texas, U.S. Pacific Islands, Vermont, West Virginia |
| Varies | 14 | <p>Alaska: Time frame unknown, never processed request for access to identifiable data</p> <p>Arizona: Complexity of the research, patient contact study</p> <p>Florida: Depends on the complexity of the research project and if the researcher submits in a timely fashion additional documentation if requested by the Cancer Registry Program and DOH IRB</p> <p>Illinois: Complexity of the research</p> <p>Kansas: Complexity of the research, type of research, type of data requested</p> <p>Maryland: Project needs, cancer registry priorities, IRB schedule</p> <p>Missouri: Can take a long time, several months minimum</p> <p>New Jersey: Complexity of the research and staffing</p> <p>New Mexico: Complexity of the research</p> <p>Tennessee: Time frame unknown; approval process changing, previous requests took 6 months</p> <p>Utah: Depends on the details of the project</p> <p>Virginia: Depends on the complexity of the project, time of year, other priorities, and staffing; typically one week to four months</p> <p>Washington: Complexity of the research</p> <p>Wisconsin: Time of year, other priorities, staffing; typically 1 week to 3–4 months</p> |

12. Limit on number of studies

| Does Not Limit Studies (50) | Limits Studies (3) |
|---|------------------------------------|
| Alabama, Alaska, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, District of Columbia, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, U.S. Pacific Islands, Utah, Vermont, Virginia, Washington, Wisconsin, Wyoming | Louisiana, Missouri, West Virginia |

Notes: Louisiana: Registry limits number of contact studies per patient to minimize patient burden. No patient can be contacted by more than one study regardless of researcher.

Missouri: Registry limits studies by restricting cases from the same population and same time period.

Tennessee: IRB Committee determines on a case-by-case basis to limit participation in studies depending on available resources.

West Virginia: Registry must limit the number of studies managed at one time due to limited staff available.

13. Involvement of cancer registry director or senior official in approval process

| Not Involved in Approval Process (4) | Involved in Approval Process (49) |
|--|---|
| Connecticut, New Hampshire, Pennsylvania, Virginia | Alabama, Alaska, Arizona, Arkansas, California, Colorado, Delaware, District of Columbia, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Puerto Rico, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, U.S. Pacific Islands, Utah, Vermont, Washington, West Virginia, Wisconsin, Wyoming |