

Privacy and IRB Issues: Breaking News from the SHRP 2 Naturalistic Driving Study

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Major Hurdles

- Defining types of participants
- Defining and distinguishing types of information and data
- Defining data flow
- Defining data access
 - Some IRBs want detailed info up front
- IRB Coordination
 - Virginia Tech, 6 site IRBs, National Academies
 - Certificate of Confidentiality

Three Types of Participants

Type 1. Primary Drivers: main focus of the study

- Asked to provide other drivers with basic information
- Special consideration of minor participants

Type 2. Fully Participating Secondary Drivers

Type 3. Other Secondary Drivers

- Regularly drive instrumented vehicle of a primary driver but decided not to participate fully; or
- Only drive instrumented vehicle of a primary driver occasionally or incidentally; or
- Are not allowed to participate as secondary drivers because they are minors.

Type 3 Participants: Issues

- Can we collect the data?
 - Waiver of consent to collect the data was requested and obtained from VT IRB
- Can we use the de-identified data?
 - NAS IRB required that the data from Type 3 be expunged
- Are they covered by the Certificate of Confidentiality?
 - Application for C of C requested that these data be covered until driver ID is performed and data is de-identified or deleted
 - No response yet

Types of Information and Data

1. Contact information (name, phone, etc.)
2. Auxiliary study information (license plate, bank, SSN)
3. Driver data (questionnaires, assessments)
4. Vehicle data (make, model, condition, equipment)
5. Driving data (continuous recording of video and sensor/parametric data)
6. Additional crash data (detailed crash investigations for selected crashes)
 - Separate effort: roadway/roadside characteristics and features from mobile data collection vans and external sources

Camera Views



Blurred snapshot of vehicle interior will be used to count passengers

Identifying Data

- Identifying: participant can be identified from the data
 - Face video
 - GPS coordinates of home and work
 - Combinations of items (rare combinations of vehicle type, age, medical conditions, etc.)
- Non-identifying: participant cannot be identified from the data
 - Identifying data that has been de-identified
 - Data can be non-identifying in its nature (traces of vehicle speed; questionnaire answers with only a participant number attached)

Examples of Data Requiring Particular Care

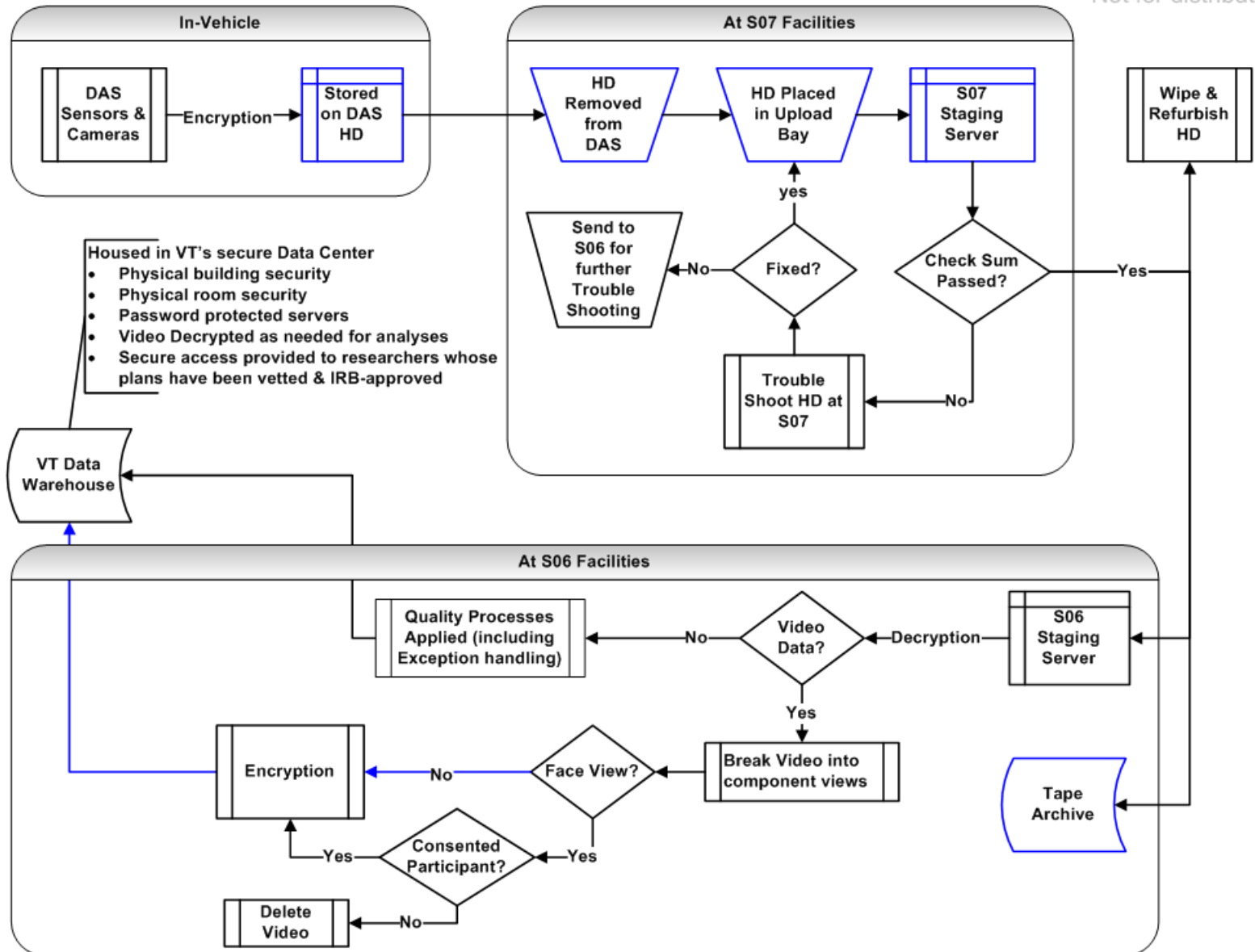
- Participant information file
- Driver face video
- GPS coordinates of home, work, or school
- Vehicle Identification Number
- Crash investigation data in combination with other information (small town, few crashes, news stories)
- Possibly other combinations of data that by themselves would not reveal identity
- Other video in case of severe/fatal crash (may be sensitive even if not actually revealing identity)
- Forward/rear video (other drivers/license plates)?

Data Flow

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Chain of Custody: DAS Data

Draft
Not for distribution



IRB Coordination: Status of Approvals

	Field Protocol	Amend 1	Amend 2	Amend3	Call Center
VT	✓	✓	✓	In process	✓
CUBRC-NY	✓	✓	Some points		
Indiana	Submitted, issues discussed; approved pending C of C				
Battelle	Preliminary discussion of issues; pending submission				
PennState	Submitted, initial round of questions answered, final submission this week				
CUBRC-FL	Initial round of questions answered				
Westat	Signed letter of reliance naming VT as IRB of Record				
NAS	Conditional approval granted yesterday				In review