

The draft report recommends the establishment of a National Data Custodian and envisages a range of new authorities to oversee the release of data. Although the intent is a faster release of data, this new layer of bureaucracy is likely to slow down the release of data, add significant costs within the system, and price the smaller researchers out of business. There is no cost/benefit analysis of this new wave of regulation. Nor is there a comparative evaluation of other options to accomplish the goals listed. It would be much simpler to instruct Medicare, IHPA, NDIA, AIHW, and other Commonwealth agencies to make their datasets available in de-identified form within 12 months of collection to qualified researchers and/or commercial entities at minimal cost. Most state-level health data is sent to AIHW or IHPA already, so there is no need for involvement of the states in health-related datasets. However, state governments could be encouraged to follow the lead of the Commonwealth. Requiring data to be controlled by a central custodian will add 3-5 years to the delays in getting data, with backlogs of hundreds of requests unless the Custodian is funded with millions of dollars which would be better spent on actual research. PLEASE don't impose another layer of bureaucracy! There must be a simpler way!