



## MEMORANDUM

FDA Human Subject Protection Program Management Staff

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**DATE:** 10/20/2023

**FROM:** Human Subject Protection (HSP) Executive Officer, Office of the Chief Scientist (OCS)

**TO:** Marisa Greenberg, CTP, FDA Project Lead

**CC:** Lubna Khan, CTP, HSP Liaison

**SUBJECT:** FDA Protocol Number: 2024-CTP-004

**STUDY TITLE:** Exploring Consumer Understanding of Tobacco Product Risk in the Context of HPHC Information and Modified Risk Claims

**SUBMISSION TYPE:** Exempt Research Determination

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Based on the information submitted, the research study title “Exploring Consumer Understanding of Tobacco Product Risk in the Context of HPHC Information and Modified Risk Claims” does not require FDA IRB review and approval because it is exempt from the requirements of 45 CFR Part 46 (45 CFR 46.104(d)(2)(ii)). If changes are proposed to ongoing human subjects research that could affect its exempt status, the HSP Liaison, in collaboration with the FDA Project Lead, must complete a new exemption determination form with supporting information to request confirmation of that determination from the HSP Executive Officer. Although this research activity is exempt from FDA IRB oversight, all of FDA’s human subjects research activities, regardless of whether the research is subject to regulation under the Common Rule or FDA regulations, will be guided by the ethical principles of respect for persons, beneficence, and justice, in accordance with the Belmont Report.

For applicable FDA Standard Operating Policies and Procedures and Staff Manual Guide 9001.4 refer to the SharePoint site for Human Subjects Research Conducted or Supported by the FDA at:  
<https://fda.sharepoint.com/sites/OC-intranet-OC-OCS-Human-Subject-protection/>.

If you have questions, or would like further information, please do not hesitate to contact the Human Subject Protection Program Management Staff in the Office of the Chief Scientist by email at [HSPPMS@fda.hhs.gov](mailto:HSPPMS@fda.hhs.gov).