Attachment 7



DATE: February 11, 2019

TO: Cathy Lesesne

FROM: Carole Harris, IRB Chair

SUBJECT: IRB Determination – Exempt

PROJECT #: 121772.4.004.00.005

PROJECT NAME: Formative Professional Development (PD) Evaluation

ICF's IRB has reviewed the description and supporting materials submitted for the project reference above and determined that the activities qualify for the Exemption identified below. Note that changes to your project activities may alter the Exempt determination. Contact the IRB prior to implementing any changes to discuss whether re-review is needed.

2018 Common Rule Exemptions Research involving children is allowed in categories 1, 4, 5, 6, 7, & 8. Limitations/exclusions of children apply in categories 2, 3. Research involving prisoners is allowed under all categories only when prisoners are incidentally included. To qualify for exemption, the research must align with the following categories and involve only minimalrisk¹ to subjects. Category Exemption Research involving education practices. Research involving normal education practices and instructional ⊠ 1. techniques used in classroom management; conducted in established education settings. 45 CFR 46.104.1 □ 2. Research involving only educational tests, surveys, interviews, observation of public behavior. (1, 2, or 3 must apply) ☐ 1. Recorded information cannot readily identify the 45 CFR 46.104.2 subject (directly or indirectly/linked) ☐ 2. Any disclosure of responses outside of the research would NOT reasonably place subject at risk (criminal, civil liability, financial, employability, educational advancement, reputation) ☐ 3. Recorded information includes identifiers (and may be sensitive) but adequate privacy and confidentiality protections are in place.

¹ Minimal risk: defined as the probability and magnitude of physical or psychological harm that is normally encountered in the daily lives, or in the routine medical, dental, or psychological examination of healthy persons

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2018 Common Rule Exemptions

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risk ¹ to subjects.	
Category	Exemption
□ 3.	Benign behavioral interventions. Research with adults limited to verbal or written responses, data entry or audiovisual recordings where adults prospectively agree.
45 CFR 46.104.3	\square 1. Recorded information cannot readily identify the
	subject (directly or indirectly/linked)
	\square 2. Any disclosure of responses outside the research would
	NOT reasonably place subject at risk (criminal, civil
	liability, financial, employability, educational
	advancement, reputation)
	\square 3. Recorded information includes identifiers (and may be
	sensitive) but adequate privacy and confidentiality
	protections in place.
□ 4.	Secondary research use of identifiable Information or identifiable biospecimens. Data were (or will be) collected for other research. Consent for current project not required.
45 CFR 46.104.4	\square 1. Biospecimens or information are publically available.
	☐ 2. Recorded information/biospecimens cannot readily
	identify the subject (directly or indirectly/linked)
	☐ 3. Use of data is regulated under HIPAA as healthcare
	operations, research, or public health research
	☐ 4. Research is conducted by/on behalf of federal agency
	using data collected for non-research purposes
□ 5.	Public benefit or service programs.
45 CFR 46.104.5	Research designed to study, evaluate, improve or examine public benefit/service programs, if the research is conducted by or supported by a federal department or agency
□ 6.	Taste and food quality. Research limited to food taste and food quality evaluation and consumer acceptance studies.
45 CFR 46.104.6	\square 1. Consumption of wholesome foods without additives
	\square 2. Food contains food ingredient(s) at or below the level
	found to be safe, or agricultural chemical or
	environmental contaminant at or below the level found

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Category	Exemption
□ 7.	Storage or maintenance of identifiable private information or biospecimens. Can only be used with:
45 CFR	\square 1. Broad consent from subjects for storage, maintenance,
46.104.7	and secondary use of their materials.
□ 8.	Secondary research with identifiable private information or biospecimens. Can only be used with:
45 CFR 46.104.8	\square 1. Broad consent from subjects for storage, maintenance,
	and secondary use of their materials.
	☐ 2. Documentation of consent was obtained.
	☐ 3. Individual results are not returned to subjects.

List of Reviewed Project Materials:

- IRB Project Information Form
- 2. Survey for information collection and informed consent (web survey is in development)
- 3. Email invitation requesting survey completion and reminder

If you have any questions regarding this finding, please email IRB@icf.com.

(Revised 02/2019)