



## Memorandum

Date March 2, 2012

From Chair, NIOSH IRB (HSRB)

Subject Report of NIOSH HSRB – Protocol No. HSRB 12-HELD-NR01 “ROVER: A National Survey of Assistance Dog Providers” Non-Research Determination Documentation

To Oliver Wirth, Ph.D. – PI  
Project Officer, ECTB, HELD, NIOSH  
Through: /Chief, ECTB, HELD, NIOSH  
/Associate Director for Science, HELD, NIOSH \_\_\_\_\_

### General Comments and IRB Actions

Your E-mails (dated 2/24/12 and 3/2/2012) have made mention of two surveys; one of Veterans and one of Assistance Dog Providers. A draft protocol has been provided for the survey of Assistance Dog Providers. A comparable protocol was not provided for the survey of Veterans. From the information provided, these surveys appear to be independent. Since the information provided regarding the survey of Veterans is inadequate to make a determination, I can only make a Research/Non-Research determination on the survey of Assistance Dog Providers.

I will need more information (comparable to the Provider protocol) to make Research/Non-Research determination on the survey of Veterans.

I have reviewed the attached draft protocol “ROVER: A National Survey of Assistance Dog Providers” submitted to the IRB on February 24, 2012. The activity described is a survey of assistance dog providers in the U.S. for the purpose of collecting information about the services they provide for Veterans. The objectives are to obtain information on agency structure, goals, target population, and services provided to Veterans including strategies they have used to address issues related to return to work.

I have determined that the proposed survey, as described, does not involve human subjects. HHS Human Research Protections Regulation, 45 CFR 46.102 (F) defines a human subject as “a living individual about whom an investigator conducting research obtains data through intervention or interaction. . . or personal private information.” As described, the proposed project will not be obtaining any information “about” an individual. The description provided indicates that proposed questionnaires only address questions about facilities and the services they provide.

Therefore, the proposed survey of assistance dog providers does not require review by the NIOSH IRB.

**End of report**

  
Mark A. Toraason, Ph.D.

cc:  
HSRB 12-HELD-NR01