

August 11, 2015

Archana LaPollo, MPH
Senior Project Director and Co-Investigator
Public Health Management Corporation
1500 Market Street
Philadelphia, PA 19102

Dear Ms. LaPollo:

On **August 7, 2015** the Public Health Management Corporation (PHMC) Institutional Review Board (IRB) reviewed the research protocol entitled “*Examination of Jail and Prison Policies Related to STD Prevention* “. In accordance with federal regulation 46.101(b)(2) of 45 CFR 46, the IRB has determined that your study meets the criteria for **exempt status**. This **approval is effective for a period of three years**, and will **expire August 6, 2018**.

The IRB has determined that your proposed project employs a survey that poses no more than minimal risk to the participants. The information will be obtained in such a way that one’s responses will not be linked to one’s identity or identifying information. Moreover, you are proposing to interview participants who will be acting in their professional capacity, and who will not be asked to disclose information of a personal or sensitive nature. Furthermore, accidental disclosure of the participants’ responses would not have the potential to harm the person’s reputation, employability, financial status, or legal standing. For these reasons, the PHMC IRB has determined that your proposed study is exempt from further IRB review.

The designation of exempt status signifies that your research activity will not be monitored by the IRB. Assuming the project does not change, it also is not subject to continuing IRB oversight. In the interests of keeping the IRB files current, exempt research is automatically given a **3-year expiration date**. If your research is not completed within the 3-year time frame, you should request an extension of the exempt approval. Otherwise, the approval will automatically terminate 30 days after the expiration date.

Exempt status does not lessen the ethical obligations to subjects as articulated in the Belmont Report. Thus, depending on the circumstances, you may need to make provisions to obtain informed consent, protect confidentiality, minimize risks, and address problems or complaints. Furthermore, although your project is exempt from ongoing IRB review, the research must be conducted according to the proposal submitted to the PHMC IRB. If changes to the approved protocol occur, a revised protocol must be reviewed and approved by the IRB before implementation.

Should you have any questions or require further information regarding the review of your protocol, please contact me at lisab@phmc.org or 215-985-2531.

Please share this determination with your co-investigators and colleagues as appropriate.

Thank you for your cooperation with the PHMC Institutional Review Board.

Sincerely,

A handwritten signature in blue ink that reads "B. Lisa Bond".

Lisa Bond, PhD
PHMC IRB Administrator

C: Carolyn Adams, PhD
Chair, PHMC IRB