

Date: June 12, 2015

To: Laurie Cluff

From: Juesta Caddell *JMC*  
IRB Director

Subject: Human Subjects Research Determination

Re: National Workplace Health Programs and Practices Survey, 0214531

Thank you for providing the RTI IRB information about RTI's role in conducting a survey of U.S. employers' health programs and practices.

Based on the review of the description of the project activities, this study does not involve human subjects. The data to be collected is not about any individuals within the organization (not "about whom"), rather the survey asks questions about employer characteristics and employer health promotion offerings ("about what"). Therefore this activity does not constitute research involving human subjects as defined by the US Code of Federal Regulations (45 CFR 46.102) and approval of these activities by the RTI IRB is not necessary.

Please note that RTI requirements related to privacy, data security, and document management still apply even though this activity is not considered human subjects research.

Please feel free to contact me with any questions.

Thank you.