Appendix I:
IRB Approval Notice

RESEARCH TRIANGLE INSTITUTE
COMMITTEE FOR THE PROTECTION OF HUMAN SUBJECTS
Request for Exemption from IRB Review

To request approval for exemption from Institutional Review Board (IRB) review, the Project Manager (includes Project Director or Leader, Principal Investigator, or Survey Manager) must complete this form and deliver the request to an IRB Administrator. The Project Manager will be notified if more information is necessary and the results of the determination.

Date: 02/24/17 **RTI Project/Proposal No.:** 0215527

Project Title: Scanner Capability Assessment of SNAP-Authorized Small Retailers (SCANR)

Project Manager: Sheryl C. Cates

Sponsor: United States Department of Agriculture (USDA) Food and Nutrition Service (FNS)

Date Participation of Human Subjects Scheduled to Begin: 01/23/18

A. Brief Description of Study Procedures and Participant Population: The Supplemental Nutrition Assistance Program (SNAP), which is administered by the U.S. Department of Agriculture (USDA), Food and Nutrition Service (FNS), is intended to provide a nutrition safety net and alleviate food insecurity among low-income Americans by increasing access to a healthy diet. However, some retailers allow SNAP participants to purchase ineligible items using their Electronic Benefit Transfer (EBT) cards. The Agricultural Act of 2014, Section 4002 (otherwise known as the 2014 Farm Bill) aims to reduce this fraud by requiring all SNAP retailers to use scanning technologies to redeem SNAP benefits. To understand the extent to which small retailers are not using the required scanning technologies and the economic and technological barriers to adoption, we will design and conduct three primary data collection activities to provide FNS with information to inform rulemaking for the 2014 Farm Bill requirement that all authorized SNAP retailers use scanning technologies to redeem SNAP benefits. The data collection activities include: industry interviews, the SCANR Survey, and follow-up interviews with retailers.

Industry Interviews. We will conduct 9 industry interviews with vendors of scanning technologies to collect data to estimate the store-level costs of being in full compliance with the 2014 Farm Bill. Respondents will include vendors that sell and install scanning hardware and software that are compatible with EBT systems (e.g., DUMAC Business Systems, Retail Data Systems, Total Retail Solutions). The structured interview guide will be organized to collect information on the specific requirements of each type of scanning system and all of the types of costs that may be incurred when purchasing, installing, and maintaining scanning systems. Each interview will last approximately 1 hour and will be conducted by teleconference. We will ask for consent to have the interview recorded; however, participants can decline to have the interview recorded and still participate.

Mixed Mode Survey. The aim of the SCANR Survey is to obtain a reliable, national estimate of the extent to which scanning systems with various levels of functionality are in place at small SNAP-authorized retailers. Small SNAP-authorized retailers are small grocery stores, medium grocery stores, convenience stores, and specialty stores, excluding chains that have 10 or more outlets under the same owner. The survey will be 15 minutes in length. Nonrespondents will be sent up to two mailings with a hardcopy of the questionnaire and a Web invitation reminding them to complete the survey. The first mailing will be sent via USPS 6 weeks after the initial delivery of the survey, and the second mailing will be subsequently sent via FedEx 3 months after the initial delivery. Two weeks after the FedEx mailing, interviewers will begin calling all non-responding retailers. Interviewers can complete the survey with retailers over the phone, or if preferred, they

can assist retailers in completing the survey by mail or via the Web. Retailers who indicate that they will complete the survey via mail or Web on their own will be flagged for phone follow-up if a completed survey is not received 2 weeks after the initial call. Data will be collected over a 14-week field period. The introductory text of the survey and the FAQ document informs participants of their rights to privacy and confidentiality and provide a toll-free telephone number and e-mail address for more information. For the mail and web versions of the survey, we are not engaging in a formal consent process but recognize that by completing the survey the individual agrees to participate. If the survey is completed by phone, we will ask for verbal consent.

Follow-Up Interviews. The purpose of the follow-up interviews with a subset of the retailers that responded to the SCANR Survey is to learn about costs, benefits, and challenges associated with implementing and operating scanning systems from a group of retailers that currently use them and about costs and other concerns of retailers that do not use scanning systems. Approximately half of the retailers selected for the interviews will be stores that reported on the survey that they currently are using scanning systems (via in-person interviews), and half will be stores that do not use scanning systems (via phone interviews). For recruiting the selected retailers for follow-up interviews, we will send an initial letter/email to the retailers. After the initial letter/email, we will contact the retailers to schedule the interview either in person or by telephone. The interviews will use a structured interview guide and last 20-30 minutes. We will ask for consent to have the interview recorded; however, participants can decline to have the interview recorded and still participate.

B. Description of Physical, Psychological, Social or Legal Risks to Participants: Participation in this study is voluntary, and respondents can choose not to answer any questions. For the survey and follow-up interviews, retailers will be told that participation will not affect their SNAP-authorization status. Furthermore, the survey and follow-up interview is collecting information on the establishment and is not collecting any personal or sensitive information. There are no physical risks to individuals participating in this study. There are minimal psychological, social, or legal risks to participating in this study. During the follow-up interviews, participants will be sharing their responses and opinions with an interviewer, but no participant will be asked questions that are sensitive in nature. When completing the survey, it is possible that answers to survey questions may be seen by others if respondents do not take precautions to keep their answers confidential when completing the survey. However, the survey questions are not sensitive in nature.

C1. For educational tests (cognitive, diagnostic, aptitude, achievement), survey or interview research with adults:

1. Is information recorded in such a manner that human subjects can be identified, directly *or through identifiers linked to the subjects?*

[X] Yes [ ] No [ ] NA

If yes, explain:_____

Mixed-Mode Survey. The surveys will collect information on the retailers' establishments and will not collect personal or sensitive information from respondents. The only exception is at the end of the survey where we ask respondents to provide their name and telephone number if they are interested in participating in a follow-up interview. Although the sample frame provided to us by FNS contains identifying information on the retailers, we will use a unique identifier to link the survey responses to the sample frame which will keep the survey data separate from the identifying information.

Industry Interviews and Follow-up Interviews. On the completion of the study, we will destroy all participants' contact information that was collected during the recruiting process. The interviews will be recorded but the recordings will also be destroyed at the end of the study. No personal identifying information will be connected to participants' survey and interview responses.

2. Would any disclosure of the human subjects' responses outside the research reasonably place the subjects at risk of criminal or civil liability or be damaging to the subjects' financial standing employability or reputation?

[ ] Yes [X] No [ ] NA

If yes, explain:

C2. For research with existing data, documents, records, pathological or diagnostic specimens:

1. Are the sources of the data publicly available?

[ ] Yes [ ] No [X] NA

If no, explain:

2. Is information recorded in such a manner that human subjects can be identified, directly *or through identifiers linked to the subjects?*

[ ] Yes [ ] No [X] NA

If yes, explain:

D. Describe other categories of exempt research[1] here: NA

[1] Note: Categories C1 and C2 above are the most common types of research conducted at RTI that may be exempt from IRB review. For a complete list of exemption criteria, please see below.

----------Space below this line for IRB use only.----------

Decision of IRB Coordinator or Chair

Name of IRB Coordinator or Chair making exemption determination: Ina Wallace, Ph D

Please check appropriate answer(s):

I agree that this study is exempt [45CFR46.101(b)] from IRB review based upon the information provided by the Project Manager above. (Check applicable category below.)

__(1) Research conducted in established or commonly accepted educational settings, involving normal educational practices, such as (i) research on regular and special education instructional strategies, or (ii) research on the effectiveness of or the comparison among instructional techniques, curricula, or classroom management methods.

_X_ (2) Research involving the use of educational tests (cognitive, diagnostic, aptitude, achievement), survey procedures, interview procedures or observation of public behavior, unless: (i) information obtained is recorded in such a manner that human subjects can be identified, directly or through identifiers linked to the subjects; and (ii) any disclosure of the human subjects' responses outside the research could reasonably place the subjects at risk of criminal or civil liability or be damaging to the subjects' financial standing, employability, or reputation.

__(3) Research involving the use of educational tests (cognitive, diagnostic, aptitude, achievement), survey procedures, interview procedures, or observation of public behavior that is not exempt under paragraph (b)(2) of this section, if: (i) the human subjects are elected or appointed public officials or candidates for public office; or (ii) Federal statute(s) require(s) without exception that the confidentiality of the personally identifiable information will be maintained throughout the research and thereafter.

__(4) Research involving the collection or study of existing data, documents, records, pathological specimens, or diagnostic specimens, if these sources are publicly available or if the information is recorded by the investigator in such a manner that subjects cannot be identified, directly or through identifiers linked to the subjects.

__5) Research and demonstration projects which are conducted by or subject to the approval of Department or Agency heads, and which are designed to study, evaluate, or otherwise examine: (i) Public benefit or service programs; (ii) procedures for obtaining benefits or services under those programs; (iii) possible changes in or alternatives to those programs or procedures; or (iv) possible changes in methods or levels of payment for benefits or services under those programs.

__(6) Taste and food quality evaluation and consumer acceptance studies, (i) if wholesome foods without additives are consumed or (ii) if a food is consumed that contains a food ingredient at or below the level and for a use found to be safe, or agricultural chemical or environmental contaminant at or below the level found to be safe, by the Food and Drug Administration or approved by the Environmental Protection Agency or the Food Safety and Inspection Service of the U.S. Department of Agriculture.

Ina Wallace

March 7, 2017

Signature of IRB Coordinator or Chair named above **Date**

Version 11-30-00