

DATE: July 15, 2019

TO: Kristen Cincotta; Bhuvana Sukumar

FROM: Carole Harris, IRB Chair

SUBJECT: IRB Determination – Exempt

PROJECT #: 152691.0.008.01.30

PROJECT NAME: Get Ahead of Sepsis Campaign Message Testing - Consumers

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 minimal-risk<sup>1</sup> to subjects.

risk <sup>1</sup> to subjects.		
Category	Exemption	
□ 1.	<b>Research involving education practices.</b> Research involving normal education practices and instructional 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)	
45 CFR 46.104.2	$\square$ 1. Recorded information cannot readily identify the	
	subject (directly or indirectly/linked)	
	$\square$ 2. Any disclosure of responses outside of the research	
	would NOT reasonably place subject at risk (criminal,	
	civil liability, financial, employability, educational	
	advancement, reputation)	
	oxtimes 3. Recorded information includes identifiers (and may be	
	sensitive) but adequate privacy and confidentiality	
	protections are in place.	

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<sup>&</sup>lt;sup>1</sup> 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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risk <sup>1</sup> to subjects.		
Category	Exemption	
□ 3.	<b>Benign behavioral interventions.</b> 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.	<b>Taste and food quality.</b> 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	

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Category	Exemption
	environmental contaminant at or below the level found
	to be safe, by the FDA, EPA, USDA.
□ 7.	Storage or maintenance of identifiable private information or biospecimens. Can only be used with:
45 CFR 46.104.7	$\square$ 1. Broad consent from subjects for storage, maintenance,
	and secondary use of their materials.
□ <b>8.</b> 45 CFR 46.104.8	Secondary research with identifiable private information or biospecimens. Can only be used with:
	$\square$ 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:**

- 1. IRB Project Information Form
- 2. Centene Complex Care IRB Addendum
- 3. Centene Triad Consent Form 6.26.19
- 4. CenteneCATIQuestionnaire\_06262019
- 5. Crisis Protocol trainging for interviewers
- 6. Centene-Complex-Care-JPlus-TriadGuide-v06-clean
- 7. Standard Crisis Protocol V3

If you have any questions regarding this finding, please email <a href="mailto:IRB@icf.com">IRB@icf.com</a>.

(Revised 02/2019)