

Date: December 8, 2017

To: Benjamin Yarnoff

From: Juesta Caddell, IRB Director *JMC*

Subject: Human Subjects Research Determination

Re: Evaluation the Sodium Reduction in Communities Program
Project 0214571.008

Thank you for providing the RTI IRB information about RTI's role in collection and analysis of data on the costs of implementing sodium reduction strategies by partner organizations of the CDC-funded Sodium Reduction in Communities Program (SRCP).

Based on the review of the description of the project activities, this study does not involve human subjects. The focus of the cost data collected in this study is not about the individuals within the organizations from which RTI will be collecting data (not "about whom"), rather the purpose is to determine cost required to implement sodium reduction strategies ("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.