



DATE: May 10, 2019  
 TO: Dana Keener Mast; Isabela Lucas  
 FROM: Carole Harris, IRB Chair  
 SUBJECT: IRB Determination – Exempt  
 PROJECT #: 141708.0.007.00  
 PROJECT NAME: EVALUATION OF THE DP18-1801 HEALTHY SCHOOLS PROGRAM

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 <u>only</u> 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.	
Category	Exemption
<input type="checkbox"/> 1. 45 CFR 46.104.1	<b>Research involving education practices.</b> Research involving normal education practices and instructional techniques used in classroom management; conducted in established education settings.
<input checked="" type="checkbox"/> 2. 45 CFR 46.104.2	<b>Research involving <u>only</u> educational tests, surveys, interviews, observation of public behavior.</b> (1, 2, or 3 must apply) <input type="checkbox"/> 1. Recorded information cannot readily identify the subject (directly or indirectly/linked) <input checked="" type="checkbox"/> 2. Any disclosure of responses outside of the research would NOT reasonably place subject at risk (criminal, civil liability, financial, employability, educational advancement, reputation) <input checked="" type="checkbox"/> 3. Recorded information includes identifiers (and may be sensitive) but adequate privacy and confidentiality protections are in place.

<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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<input type="checkbox"/> <b>3.</b>  45 CFR 46.104.3	<b>Benign behavioral interventions.</b> Research with adults limited to verbal or written responses, data entry or audiovisual recordings where adults prospectively agree.  <input type="checkbox"/> 1. Recorded information cannot readily identify the subject (directly or indirectly/linked)  <input type="checkbox"/> 2. Any disclosure of responses outside the research would NOT reasonably place subject at risk (criminal, civil liability, financial, employability, educational advancement, reputation)  <input type="checkbox"/> 3. Recorded information includes identifiers (and may be sensitive) but adequate privacy and confidentiality protections in place.
<input type="checkbox"/> <b>4.</b>  45 CFR 46.104.4	<b>Secondary research use of identifiable Information or identifiable biospecimens.</b> Data were (or will be) collected for other research. Consent for current project not required.  <input type="checkbox"/> 1. Biospecimens or information are publically available. <input type="checkbox"/> 2. Recorded information/biospecimens cannot readily identify the subject (directly or indirectly/linked) <input type="checkbox"/> 3. Use of data is regulated under HIPAA as healthcare operations, research, or public health research <input type="checkbox"/> 4. Research is conducted by/on behalf of federal agency using data collected for non-research purposes
<input type="checkbox"/> <b>5.</b>  45 CFR 46.104.5	<b>Public benefit or service programs.</b>  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
<input type="checkbox"/> <b>6.</b>  45 CFR 46.104.6	<b>Taste and food quality.</b> Research limited to food taste and food quality evaluation and consumer acceptance studies.  <input type="checkbox"/> 1. Consumption of wholesome foods without additives <input type="checkbox"/> 2. Food contains food ingredient(s) at or below the level found to be safe, or agricultural chemical or environmental contaminant at or below the level found to be safe, by the FDA, EPA, USDA.

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<input type="checkbox"/> 7.  45 CFR 46.104.7	<p><b>Storage or maintenance of identifiable private information or biospecimens.</b> Can only be used with:</p> <input type="checkbox"/> 1. Broad consent from subjects for storage, maintenance, and secondary use of their materials.
<input type="checkbox"/> 8.  45 CFR 46.104.8	<p><b>Secondary research with identifiable private information or biospecimens.</b> Can only be used with:</p> <input type="checkbox"/> 1. Broad consent from subjects for storage, maintenance, and secondary use of their materials. <input type="checkbox"/> 2. Documentation of consent was obtained. <input type="checkbox"/> 3. Individual results are not returned to subjects.

<p><b>List of Reviewed Project Materials:</b></p> <ol style="list-style-type: none"> <li>1. IRB Project Information Form</li> <li>2. LEA Implementation Survey Consent</li> <li>3. LEA Initial Contact Approval Request Email</li> <li>4. LEA Key Informant Interview Guide and Consent</li> <li>5. LEA Key Informant Interview Guide Consent</li> <li>6. LEA Interview Date-Time Confirmation Calendar appointment</li> <li>7. LEA Interview Scheduling Email</li> <li>8. LEA Survey Respondent First Email</li> <li>9. LEA Survey Respondent Reminder Email</li> <li>10. School Implementation Survey and Consent</li> <li>11. School Implementation Survey Consent</li> <li>12. School Initial Contact Approval Request Email</li> <li>13. School Key Informant Interview Guide and Consent</li> <li>14. School Key Informant Interview Guide Consent</li> <li>15. School email to schedule interview 4.25.19</li> <li>16. School Survey Responded First Email 4.25.19</li> <li>17. School Survey Responded Contact Reminder Email 4.25.19</li> <li>18. SEA Implementation Survey Consent</li> <li>19. SEA Initial Contact Approval Request Email</li> <li>20. SEA Key Informant Interview Guide and Consent</li> <li>21. SEA Key Informant Interview Guide Consent</li> <li>22. SEA Interview Date-Time Confirmation Calendar appointment</li> <li>23. SEA Interview Scheduling Email</li> <li>24. SEA Survey Respondent First Email</li> <li>25. SEA Survey Respondent Reminder Email</li> </ol>
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If you have any questions regarding this finding, please email [IRB@icf.com](mailto:IRB@icf.com).

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(Revised 02/2019)