

Attachment D

March 9, 2022

Paul Sutton, Deputy Director
Division of Vital Statistics
National Center for Health Statistics/CDC

Paul:

The collection of counts of births, deaths, marriages and divorces (OMB clearance under 0920-0213) does not constitute research involving human subjects under 45 CFR 46 and therefore does not require review by an IRB. (research concerning human subjects) is not applicable to data collected by the National Vital Statistics System.

/Amy M. Branum, Ph.D./

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