

**Behavioral Risk Factor Surveillance System (BRFSS)**  
(OMB Control No. 0920-1061, expiration date 03/31/2023)

## **Support Statement A**

### **11. Institutional Review Board (IRB) and Justification for Sensitive Questions**

CDC has determined that the BRFSS information collection is exempt from the requirements of 45 CFR 46. IRB approval is not required.

The BRFSS includes standard demographic questions (such as race, gender identity and income category) which may be considered sensitive. In addition, some questions regarding preventive behaviors, such as HIV testing, may be considered sensitive. One module on adverse childhood experiences is also sensitive and interviewers are trained specifically to reassure respondent who respond to this module (see appendices in Attachment 14). Participating states have used these standardized questions on state behavioral risk surveys for many years. Sensitive questions are necessary to identify changes in behaviors and/or self-assessments of health status when aggregated to local or state levels. In order to assess changes in health risk behaviors, it is necessary to ask questions of a sensitive nature. This sensitive information would be pertinent to determine state needs for health programs and services.