

**State Sentencing Commissions Data Pilot Study
OMB Generic Clearance Package Attachments**

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Attachment A: Pre-notification Email

Subject line: State Sentencing Data Request

Formal request:

To: [Primary contact name/title]

Cc: [Secondary contact, if available]

Dear (NAME),

The U.S. Department of Justice's Bureau of Justice Statistics (BJS), in partnership with RTI, is conducting a pilot project to document the availability of state sentencing data and the processes by which such data can be requested from state/local sentencing commissions like yours. These data are vital to understanding sentencing practices across states and will be used to inform the development of a nationally unified statistical series.

In the coming week, you will receive an email from RTI regarding a brief, low burden request to report data. You will have multiple options for participation:

- **If your commission already publishes 2024 (or latest) sentencing statistics**, please send a URL to your report, dashboard, and/or publicly available data files (and codebook, if available).
- **If published materials are not available**, please send any internal file your office already produces that you can share, including, but not limited to, aggregate or individual-level data in any format or level of detail through a secure FTP site.
- **If a conversation is preferred**, we are happy to schedule a short call to discuss the request and answer questions.
- Further details will be provided in the upcoming request. In advance, **please reply to this message to confirm that we have reached the appropriate contact for sentencing data requests at [FILL: COMMISSION AGENCY NAME]**.

BJS is authorized to conduct this data collection under 34 U.S.C. § 10132. By law, BJS employees and its data collection agents may only use your agency's information for statistical or research purposes and must protect the confidentiality of information identifiable to a private person [34 U.S.C. §§ 10134 and 10231]. BJS is not permitted to publicly release your agency's responses in a way that could reasonably identify a specific private person. None of the data collected through this effort will be publicly disseminated by BJS.

If you have questions regarding this request, please contact Rachel Seo-Park, BJS project manager, at Rachel.Seo-Park@usdoj.gov or call (202) 307-0765 or [RTI project manager, title, email, phone]

Thank you for your time and for your continued support of efforts to improve the documentation of state sentencing statistics.

Sincerely,

Kevin M. Scott, Ph.D.
Acting Director
Bureau of Justice Statistics

Attachment B: Formal Request Email

Subject line: BJS Data Request —State Sentencing Data

Formal request:

To: [Primary contact name/title]

Cc: [Secondary contact, if available]

Dear [Title] [Lastname],

As noted in our earlier email, on behalf of the Bureau of Justice Statistics (BJS), RTI is conducting a pilot study to document the availability of state sentencing data and the processes by which such data may be requested. These data are vital to understanding sentencing practices across states and may be used to inform the development of a nationally unified statistical series.

If your commission publishes 2024 (or the most recent year available) sentencing statistics, please reply with the URL(s) to any reports, dashboards, publicly available data files, or codebook (if available). If your office maintains internal tables or data extracts, including aggregate or individual-level data in any format or level of detail that are not publicly accessible, please upload the file to our designated secure FTP site [FTP LOCATION] for encrypted data exchanges. Please also include any accompanying codebook or documentation.

Please confirm whether you can provide the requested materials by [SPECIFIC DATE]. If your office is unable to provide the requested materials or has questions about the request, please contact RTI [add name and email], to arrange a brief call to discuss available options and next steps.

In case formal agreements are required to share data, we have attached draft templates for a Memorandum of Understanding (MOU) for aggregate data for your reference. Depending on your response and data availability, RTI will coordinate with your office to finalize and execute the appropriate document.

If you have any questions about the purpose of the project, please call BJS Project Manager, Rachel Seo-Park at [PHONE] or send an email to [EMAIL]. Thank you for your time and for supporting improvements to national sentencing statistics.

Sincerely,

[RTI contact]

[EMAIL, PHONE]

BJS is authorized to conduct this data collection under 34 U.S.C. § 10132. By law, BJS employees and its data collection agents may only use your agency's information for statistical or research purposes and must protect the confidentiality of information identifiable to a private person [34 U.S.C. §§ 10134 and 10231]. BJS is not permitted to publicly release your agency's responses in a way that could reasonably identify a specific private person. None of the data collected through this effort will be publicly disseminated by BJS.

Attachment C: Nonresponse Email and Phone Follow-up Scripts

Email Follow-up

Subject line: Reminder: Data Request from BJS

Dear [insert name]

About two weeks ago, we sent you an email about the State Sentencing Data Pilot, conducted by RTI on behalf of the Bureau of Justice Statistics. Our records show that we have not yet received a response from you. You have two ways to respond:

- ❖ **If your commission publishes 2024 (or the most recent year available) sentencing statistics**, please reply with the URL(s) to your report, dashboard, publicly available data files, and codebook (if available).
- ❖ **If your office maintains internal tables or extracts**, including aggregate or individual-level data in any format or level of detail, containing sentencing data that are not publicly accessible, please upload the file to our designated secure FTP site [FTP LOCATION]. Please include any accompanying codebook or documentation. If a formal agreement is required to share data, or would like to schedule a brief call, please call RTI at [PHONE] or send an email to [EMAIL].

Your response is extremely valuable to help us understand what information is currently accessible and what barriers might stand in the way of responding to our request. Thank you for your time and for supporting improvements to national sentencing statistics.

Sincerely,
[RTI contact]

Phone Follow-up

[IF CALL RINGS TO A GATEKEEPER]

Hello, this is <<INSERT NAME>> with RTI, calling on behalf of the Bureau of Justice Statistics, regarding the BJS State Sentencing Data Pilot. I am following up on an email that we sent to <<TITLE>> <<NAME>>. May I speak with <<TITLE>> <<NAME>>? [IF NEEDED, CONFIRM EMAIL ADDRESS AND/OR APPROPRIATE CONTACT NAME/EMAIL.]

[IF LEAVING MESSAGE ON VOICEMAIL OR WITH A GATEKEEPER]

Hello, this is <<INSERT NAME>> with RTI, calling on behalf of the Bureau of Justice Statistics, regarding the BJS State Sentencing Data Pilot. I am following up on an email that we sent to <<TITLE>> <<NAME>>. I was hoping to speak to

<<TITLE>> <<NAME>> about your commission's state sentencing data and statistics. Please give me a call back at [PHONE] to discuss this further. Thank you and have a good day!

[IF CALL REACHES OR IS ROUTED TO ADMINISTRATOR]

Hello, this is <<INSERT NAME>> with RTI, calling on behalf of the Bureau of Justice Statistics (BJS), regarding the BJS State Sentencing Data Pilot. We recently sent you an email inviting you to provide your commission's state sentencing data, report, or dashboard. I wanted to follow up with you to confirm that you received the request.

Did you receive the request?

[IF ADMINISTRATOR HAS NOT RECEIVED LETTER]

Let me review the information we have on file for you. [\[REVIEW E-MAIL ADDRESS. ASK FOR THE ADMINISTRATOR'S PREFERRED METHOD OF CONTACT AND OFFER TO RE-SEND THE INFORMATION.\]](#)

[READ TO ALL]

On behalf of BJS, we're requesting data from state sentencing commissions to better understand sentencing practices across the US. Would you be willing to participate by sending your case-level data produced from January 1 to December 31, 2024 (or your most recently available data)?

[AS NEEDED]

- We understand this request comes in addition to your existing workload, and we aim to make it as easy as possible. We can accept data in nearly any format—this could be a URL to your public report or dashboard, or a file your office already produces, like a CSV, Excel spreadsheet, or PDF.
- The data your agency provides help BJS understand what information is currently accessible and where there are limitations. This isn't about evaluating your commission's practices — it's to assess what data exists and how easy or difficult it is to provide it them BJS.
- The data collected from your agency will not be used to generate representative statistics and will not be publicly published. By law, BJS employees and its data collection agents may only use your court's information for statistical or research purposes and must protect the confidentiality of information identifiable to a private person.

[IF YES TO PARTICIPATE]

Thank you! Please send your data by responding to the email. Do you need me to resend the email invitation?

If you need any assistance submitting your data or have any questions, please contact us at please contact us at [PHONE] or [EMAIL]. Thanks again and have a nice day.

[IF NO TO PARTICIPATE]

Thank you, would you be willing to tell us why you are not willing to participate? [DOCUMENT VERBATIM RESPONSE AND KEY ONE OR MORE IN THE BELOW CATEGORIES]

- LEGAL — State law or policy prevents sharing, even in aggregate.
- CONF — Confidentiality concerns (e.g., small cells or identifiability).
- IT — Data systems cannot easily produce the requested aggregates.
- STAFF — Insufficient staff or competing priorities at this time.
- COST — A fee or contract would be required to extract the data.
- TIMING — The request overlapped with other reporting deadlines.
- QAUL — Data quality concerns.
- OTHER — Other (please specify): _____

Additional Questions to ask refusals if receptive:

- What types of data (case-level, summary, administrative) does your commission maintain?
- Are there any procedural, legal, or technical barriers that prevent sharing data externally — even in summary form?
- Is your commission statutorily required to collect or report sentencing data?
- What kinds of access mechanisms are in place for the data you maintain? (For example, is any of it public, available under restricted access, or only shared through formal agreements like an MOU).

Thank you for taking the time to speak with me today. Have a nice day!

Attachment D: Refusal Email

For commissions that explicitly declined to participate in the study (explicit refusal)

Subject: BJS Data Request: Thank you for the consideration

Dear [Title] [LastName],

Thank you for letting us know about your decision regarding our recent request to collect your most up to date state sentencing data. We understand that you do not wish to be contacted further about this request and will respect that preference.

To help us improve possible future data collections, if you are able, please answer the question below -- you can simply check any items that apply and reply to this email.

Why are you unable to participate at this time? (check all that apply):

- State law or policy prevents sharing data, even in aggregate.
- Confidentiality concerns (e.g., small data cells or identifiability).
- Data systems cannot easily produce the requested aggregates.
- Insufficient staff or competing priorities at this time.
- A fee or contract would be required to extract the data.
- The request overlapped with other reporting deadlines.
- Data quality concerns.
- Other (please specify): _____
- Please do not contact our office again about this request.

Thank you again for your consideration. Should your office be able to provide additional feedback or a delayed submission of data at a later date, we would appreciate any communication regarding this matter. If you have any questions or would like to schedule a brief call, please call RTI, the data collection agent, at [PHONE] or send an email to [EMAIL].

Sincerely,

[RTI contact]

For commissions that still did not respond after nonresponse follow-up (implicit refusal)

Subject: BJS Data Request: Thank you for the consideration

Dear [Title] [LastName],

We are following up regarding our recent data request, as we have not yet received a response from your commission.

If you are able, we would greatly appreciate it if you could answer the question below to help us improve planning for possible future data collections - you can simply check any items that apply and reply to this email.

Why are you unable to participate at this time? (check all that apply):

- State law or policy prevents sharing data, even in aggregate.
- Confidentiality concerns (e.g., small data cells or identifiability).
- Data systems cannot easily produce the requested aggregates.
- Insufficient staff or competing priorities at this time.
- A fee or contract would be required to extract the data.
- The request overlapped with other reporting deadlines.
- Data quality concerns.
- Other (please specify): _____
- Please do not contact our office again about this request.

Thank you again for your consideration. Should your office be able to provide additional feedback or a delayed submission of data at a later date, we would appreciate any communication regarding this matter. If you have any questions or would like to schedule a brief call, please call RTI, the data collection agent, at [PHONE] or send an email to [EMAIL].

Sincerely,

[RTI contact]

Attachment E: MOU Template

MEMORANDUM OF UNDERSTANDING BETWEEN THE BUREAU OF JUSTICE STATISTICS AND Data Provider FOR THE BJS PROGRAM

I. PURPOSE

The purpose of this Memorandum of Understanding (MOU or Agreement) is to set forth the shared understanding of the Bureau of Justice Statistics (BJS), located within the Office of Justice Programs (OJP) in the U.S. Department of Justice (DOJ), and Data Provider with respect to the provision of data (herein, data or information) from Data Provider to BJS for the *BJS Program*.

BJS is a recognized Federal statistical agency and is one of 13 principal statistical agencies recognized by the Office of Management and Budget that has statistical work as its primary mission. Fundamental Responsibilities of Recognized Statistical Agencies and Units, 88 Fed. Reg. 56708, 56710 (August 18, 2023). BJS's mission is to collect, analyze, publish, and disseminate statistical information on crime, criminal offenders, victims of crime, and the operation of justice systems at all levels of government.

Data Provider will provide the requested data to BJS on a <insert requested timeline: one-time, annual, etc.> basis. These data will contribute to BJS's objectives to <insert a brief sentence or two describing the program objectives, such as "describe characteristics of the offender population at the national and state levels">.

This MOU includes these attachments:

- Project description (Attachment I)
- List of data variables and reference years that Data Provider will provide to BJS (Attachment II)
- <other attachments, as applicable (e.g., in the event of a reimbursable agreement, a Form 7600 should be executed and included as an attachment)>

This MOU describes the terms of the data provision and the responsibilities and obligations of both Parties. In addition, the BJS Data Protection Guidelines summarize the many statutes,

regulations, and other authorities that govern BJS. The guidelines are published on the BJS website at [bjs_data_protection_guidelines.pdf](#).

II. LEGAL AUTHORITY

The Director of BJS is statutorily authorized to enter into this Agreement and to “utilize, with their consent, the records . . . [and] information . . . of other Federal, State, local and private agencies and instrumentalities. . . and to enter into agreements with such agencies and instrumentalities for purposes of data collection and analysis.” [34 U.S.C. § 10132(d)(1)].

Data Provider is authorized to enter into this Agreement and provide data to BJS under <insert appropriate authority(ies)>

<If the MOU includes reimbursement, add: “DOJ components, under 28 U.S.C. § 530C, may enter into reimbursable agreements with other entities to carry-out their mission.”>

III. DEFINITIONS

Key terms in this Agreement (e.g., incident, personally identifiable information (PII), information identifiable to a private person, statistical activities, statistical purpose, etc.) will maintain their definitions as provided by Federal law and policy, to include statutes, regulations, and other guidance provided by the Office of Management and Budget (OMB) and the DOJ.

For this MOU, the term “data collection agent” refers to the entity (e.g., a private or nonprofit research organization or an institution of higher learning) that receives funding from BJS through a cooperative agreement, grant, contract, subaward, subcontract, or another funding agreement to perform statistical activities and individuals that work under such an award.. BJS’s data collection agents are subject to applicable Federal laws, regulations, and other authorities that govern BJS.

The term “Parties” means BJS and Data Provider.

IV. EFFECTIVE DATE AND PERIOD OF MOU

This MOU shall become effective upon the date both Parties sign it. This Agreement shall remain in effect for <X year(s)> from the effective date, after which time it may be renewed pending written approval by both Parties.

V. RESPONSIBILITIES OF THE PARTIES

(A) BJS RESPONSIBILITIES

To fulfill its responsibilities under this MOU, BJS shall –

- submit a written request <frequency> to Data Provider for data
- ensure that only authorized personnel will have access to the data provided by Data Provider.
- ensure that all personnel with access to the data provided by Data Provider will be advised of the provisions of this MOU and will agree to act in accordance with its terms
- notify Data Provider of any irregularities or other data quality issues identified during the project
- **ADDITIONAL RESPONSIBILITIES, IF NONE, DELETE THIS BULLETPPOINT**
- adhere to the terms outlined in this MOU.

(B) Data Provider RESPONSIBILITIES

To fulfill its responsibilities under this MOU, Data Provider shall -

- securely transmit directly to BJS or its designated data collection agent the requested data in the scope and format requested to the extent practicable
- provide the requested data according to the agreed-upon <frequency> while this MOU is in effect
- provide available data documentation or other information to BJS or its designated data collection agent to assist with their understanding of the data, or describe data quality issues or concerns
- provide technical assistance, based on the availability of resources, about the data transmitted to BJS or its designated data collection agent
- notify BJS or its designated data collection agent of any changes in how the data are collected or coded, or how they should be interpreted.
- **ADDITIONAL RESPONSIBILITIES, IF NONE, DELETE THIS BULLETPPOINT**
- adhere to the terms of this MOU.

VI. DATA CONFIDENTIALITY AND PRIVACY REQUIREMENTS

By law, BJS will use the information only for statistical purposes and is required to ensure confidentiality <[34 U.S.C. §§ 10134, 10231]>. BJS is required to maintain the appropriate administrative, technical, and physical controls to protect PII against unauthorized use or disclosure.

Specifically, BJS will adhere to the following requirements -

- use the data it receives from Data Provider only for research and statistical purposes.

- reduce the volume of PII collected, used, or retained to the minimum necessary and limit its use to only statistical or research purposes.
- limit access to PII to only those individuals who must have such access, including requisite IT security administrators. require that all individuals with access to PII complete data security or confidentiality training, as applicable.
- apply the appropriate disclosure avoidance measures to ensure that published data in reports and other statistical products do not include information which can reasonably be expected to be identifiable to a private person.
- employ sanctions for anyone failing to comply with DOJ policies and procedures, in accordance with applicable laws and regulations.

VII. DATA SECURITY

BJS shall maintain the appropriate administrative, physical, and technical safeguards to handle PII collected or maintained under its authority in accordance with applicable DOJ IT security policies and regulations, OMB guidance, and Federal law.

Specifically, BJS will:

- ensure information systems that maintain PII are adequately secured in accordance with the Federal Information Security Modernization Act of 2014. [FISMA; Pub. L. No. 113-283]
- adhere to Federal Standards for Security Categorization of Federal Information and Information Systems (FIPS 199), [National Institute of Standards and Technology \(NIST\) guidelines \(NIST SP 800-60 rev.1 Volume I&II\)](#) to categorize the sensitivity of all information collected or maintained on behalf of BJS
- once the system has been categorized, secure data in accordance with the accepted Risk Management Framework ([NIST SP 800-37 rev. 2](#)), along with controls outlined within NIST SP 800-53, Rev5
 - use secure file transfer exchanges that encrypt data in transit and at rest
 - ensure all cooperative agreements and contracts involving the processing and storage of PII comply with DOJ policies on remote access and security incident reporting.

To comply with the Cybersecurity Enhancement Act of 2015 [codified in relevant part at 6 U.S.C. § 151], information that is transmitted to and from OJP systems is screened for cybersecurity threats, including data collected and maintained under BJS's authority.

VIII. DATA COLLECTION AGENTS

BJS's data collection agents work under BJS's authority to perform statistical activities, including data collection, maintenance, analysis, and dissemination. BJS's data collection agents are subject to applicable Federal laws and authorities that govern statistical data and must adhere to the data security and confidentiality requirements in 28 C.F.R. Part 22.

IX. DATA DISPOSITION

BJS is required to follow applicable Federal regulations at 28 C.F.R. § 22.25 related to the disposition of data containing information identifiable to a private person and applicable National Archives and Records Administration retention schedules, unless the data are still needed for statistical purposes.

BJS's data collection agents are required to return to BJS and/or destroy PII or other nonpublic data collected in conjunction with BJS-funded activities upon delivery of the data to BJS and project completion.

X. DATA ARCHIVING

Consistent with its statistical mission and subject to strong confidentiality protections, BJS makes its published microdata and related study documentation available to external parties at its approved enclaves, currently located within the Inter-University Consortium for Political and Social Research (ICPSR), a research center of the Institute for Social Research (ISR) at the University of Michigan's National Archive of Criminal Justice Data (NACJD) or the Federal Statistical Research Data Center, or their successors, to the extent practical for secondary analysis to support replication and encourage further research in the field of criminal justice.

BJS applies the necessary statistical techniques to mitigate disclosure risks and determines the appropriate access method to protect confidentiality. Microdata files are available as either public-use or restricted-use files. BJS protects respondent confidentiality in public-use and restricted-use files by applying the appropriate statistical disclosure limitation techniques to mitigate disclosure risk, such as removing, masking, blanking, or collapsing direct and indirect variables and records.

Microdata files that do not include PII are available for public use and may be downloaded. Microdata files that require additional confidentiality protections are accessible to approved researchers for statistical and research purposes in a restricted setting. BJS adheres to the requirement for Federal statistical agencies to use a uniform application process with standard review and approval criteria to accept and review applications for restricted data (confidential statistical data) [44 U.S.C. §3583]. Prospective users of BJS's restricted data must apply and be approved for access through the Standard Application Process (SAP).

Approved users of BJS's restricted-use data must agree to use the data only for statistical or research purposes; operate the required technical, administrative, and physical controls to protect the data; adhere to BJS's output rules; and comply with Federal regulations to protect human subjects.

For more information about the BJS's archiving practices, see <https://www.icpsr.umich.edu/web/pages/NACJD/index.html>. For more information about the SAP, see [*M-23-04 Establishment of Standard Application Process Requirements in Recognized Statistical Agencies and Units.*](#)

XI. INCIDENT RESPONSE PROCEDURES

In the event of a real or suspected data incident involving PII collected or maintained by BJS or its data collection agents under this Agreement, BJS will follow established incident response procedures and rules of behavior. These procedures include the timely internal and external notification to the appropriate DOJ officials, law enforcement agencies, and individuals potentially impacted by the incident; assessment of the potential risk of harm; and development of appropriate mitigation options. In the event of a security incident, BJS may disclose limited information to the appropriate agencies, entities, and persons to respond to an incident involving identifiable information maintained by BJS or to assist another agency in its response to an incident.

XII. PENALTIES FOR UNAUTHORIZED DISCLOSURE

Each Party shall be responsible for all illegal acts or omissions of its own staff, employees, and officers.

Violations of the confidentiality provisions of 34 U.S.C. § 10231 shall constitute a violation of this Agreement and may be punished by a fine up to \$10,000, in addition to any other penalty imposed by Federal law. Further penalties for unlawfully revealing or disseminating BJS's statistical data are found in 18 U.S.C. § 1905. Such penalties include mandatory termination from employment, as well as a fine, term of imprisonment of not more than one year, or both.

In the event BJS or its data collection agents fail to comply with any of the material terms of this Agreement, the Data Provider shall have the right to terminate the Agreement, in addition to pursuing all remedies available under Federal law. Additionally, at the direction of Data Provider, BJS shall forthwith return or dispose of all information provided under this Agreement.

XIII. LIABILITY/INDEMNIFICATION

The Parties will cooperate with one another in the investigation and resolution of any administrative claim or litigation that could arise from conduct related to the provisions of this Agreement. Each Party shall be responsible for any liability arising from its own conduct and retains immunity and all defenses available to them pursuant to Federal law, and neither Party agrees to insure, defend, or indemnify the other Party.

In the event of a dispute between the Parties, each Party shall use its best efforts to resolve the dispute in an informal fashion through consultation and communication that is mutually acceptable to both Parties.

XIV. MODIFICATION OR TERMINATION

This MOU may be modified at any time by a written modification which is approved and signed by the appropriate official(s) of each Party.

This MOU may be terminated at any time by either of the Parties. The Party terminating this MOU shall notify the other Party in writing of its intention at least 90 days prior to the intended termination date.

XV. LIAISONS

The Parties identified below will collaborate on the oversight of this MOU. Each Party agrees to inform the other of changes to the liaison information during the effective period of the MOU.

BUREAU OF JUSTICE STATISTICS

Name: _____

Title: _____

Phone: _____

Email: _____

<DATA PROVIDER>

Name: _____

Title: _____

Phone: _____

Email: _____

XVI. EFFECT OF THE MOU

This MOU will have no effect on any other agreements that may be in existence between the Parties.

XVII. APPROVAL

By their signatures below, the authorized officials approve this MOU:

BUREAU OF JUSTICE STATISTICS

Signature

Title:

Date

Data Provider

Signature

Title:

Date

The BJS Data Collection Agent must sign this document at the request of the data provider

<BJS DATA COLLECTION AGENT>

Signature

Title:

Date

Attachment F: RTI IRB Determination Letter



Office of Research Protection

3040 Cornwallis Road ■ PO Box 12194 ■ Research Triangle Park, NC 27709-2194 ■ USA
Telephone 919-316-3358 ■ Toll Free 1-866-214-2043 ■ Fax 919-316-3897 ■ www.rti.org

NOT HUMAN RESEARCH DETERMINATION

September 26, 2025

Michael Planty
202-728-1955
mplanty@rti.org Dear

Michael Planty:

On 9/24/2025, the IRB reviewed the following submission:

Type of Review:	Initial Study
Title:	BJs SSP_State Sentencing Commissions Data Pilot Study
Investigator:	Michael Planty
IRB ID:	STUDY00023325
Funding Source:	Dept of Justice BJS
Customer/Client Name:	Dept of Justice BJS
Project/Proposal Number:	36653_1
Contract/Grant Number:	15PBJS-24-GK-01761-BJSB
IND, IDE, or HDE:	None

The IRB determined that the proposed activity is not research involving human subjects as defined by DOJ regulations 28 CFR 46.

Although RTI IRB oversight of this activity is not required, this determination applies only to the activities described in the IRB submission and may not apply should any changes be made. If the nature or scope of the activity changes and there are questions about whether the revised activities constitute human subjects research, you should contact the IRB to discuss whether a new submission and determination is necessary.

Sincerely,

The RTI Office of Research Protection