

Exemption Category 2

Research that only includes interactions involving educational tests (cognitive, diagnostic, aptitude, achievement), survey procedures, interview procedures, or observation of public behavior (including visual or auditory recording) if at least one of the following criteria is met:

Data collected anonymously	No Risk if inadvertently disclosed	Sensitive identifiable data*
(i) The information obtained is recorded by the investigator in such a manner that the identity of the human subjects cannot readily be ascertained, directly or through identifiers linked to the subjects.	(ii) Any disclosure of the human subjects' responses outside the research would not reasonably place the subjects at risk of criminal or civil liability or be damaging to the subjects' financial standing, employability, educational advancement, or reputation.	(iii) The information obtained is recorded by the investigator in such a manner that the identity of the human subjects can readily be ascertained, directly or through identifiers linked to the subjects. *Limited IRB Review Required

Studies <i>not</i> eligible for Exempt #2 include:	Additional definitions/notes:
<ul style="list-style-type: none"> ◆ Video recording of participants (unless the video recording is deleted after collection). ◆ Focus groups (or similar activities that are functionally the same as focus groups). ◆ Interaction with children. ◆ Collecting inherently high risk data, such as HIV status, criminal behaviors, suicide, medical information, traumatic experiences, etc. ◆ Interventions, manipulation of environment, manipulations intended to effect change in behavior or beliefs, or physical procedures. ◆ Linking collected data to other individual-level data. 	<ul style="list-style-type: none"> ◆ This category involves exclusively, educational tests, surveys, interviews or observations of public behavior. It does not include interventions. ◆ Public behavior is behavior taking place in a publicly accessible location in which the subject does not have an expectation of privacy (e.g., a public plaza or park, a street, a building lobby, a government building). If subjects have a reasonable expectation of privacy, the project may not qualify for this Exempt category.

Examples: May be eligible for Exempt #2:	Examples: May <i>not</i> be eligible for Exempt #2:
<ul style="list-style-type: none"> ◆ Passively observing children interacting on the playground OR adults' buying habits in a local McDonald's restaurant (i.e., passive public observations, no identifiers, no-risk data, observations in a 'public' setting). ◆ Anonymous survey of college students' perception of college life. ◆ Questionnaire about outdoor exercise, including collection of age and zip code. 	<ul style="list-style-type: none"> ◆ Observing the conduct of middle school students in their classroom. ◆ Survey of college students' perception of college life and linking the responses to students' academic performance/outcomes. ◆ Having participants complete questionnaires about physical activity, wear a pedometer and receive daily reminder to walk, followed by a final questionnaire to see if walking activity improved.