

Exemption Category 3

Research involving benign behavioral interventions in conjunction with the collection of information from an adult subject through verbal or written responses (including data entry or audiovisual recoding if the subject prospectively agrees to the intervention and information collection and at least one of the following criteria is met:

Data collected anonymously	No Risk if inadvertently disclosed	Sensitive identifiable data*
(A) 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.	(B) 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.	(C) 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

Benign Behavioral Intervention: Brief in duration, harmless, painless, not physically invasive, not likely to have a significant adverse lasting impact on the subjects, and the investigator has no reason to think the subjects will find the interventions offensive or embarrassing.

Studies <i>not</i> eligible for Exempt #3 include:	Deception or Incomplete Disclosure
<ul style="list-style-type: none"> ◆ Children and/or vulnerable populations (e.g. decisionally-impaired). ◆ Collecting inherently high risk data, such as HIV status, criminal behaviors, suicide, medical information, etc. ◆ Physical procedures: Blood Pressure, EEG, activity trackers, eye trackers, blood draws, ultrasound, etc. ◆ Testing medical devices. ◆ Linking study data to other data such as medical records, student records, administrative data. ◆ Incomplete disclosure or deception that is not prospectively disclosed. 	<p>Exemption only if all of the following are met:</p> <p>Deception/incomplete disclosure are authorized by the subject—prospectively informed that they may be unaware of or misled regarding the nature/purpose of the study.</p> <p>The information withheld is unlikely to meaningfully effect willingness to participate.</p> <p>The deception/incomplete disclosure does not preclude disclosure of risks or discomfort, or voluntary participation.</p> <p>The deception/incomplete disclosure does not involve misleading subjects about anything that may be substantively upsetting or cause distress.</p>

Examples: May be eligible for Exempt #3:	Examples: May <i>not</i> be eligible for Exempt #3:
<ul style="list-style-type: none"> ◆ Health eating intervention with a pre/post questionnaires. ◆ Study among young adults evaluating preferred snack foods following viewing a movie. Participants may watch a happy movie and others may watch a sad movie. Movie selection is manipulated based on pre-survey data. Participants are told in the consent form that they will be misled or not fully informed about the nature/purpose of the study. 	<ul style="list-style-type: none"> ◆ Healthy eating intervention with pre/post questionnaires and use of student academic record and food buying habits collected from student ID purchases. ◆ Study among young adults evaluating preferred snack foods following viewing a movie. Participants may watch a happy movie and others may watch a sad movie. Movie selection is manipulated based on pre-survey data. Participants are unaware that the movie selection is manipulated or the full nature/purpose of the study.