**University of Vermont**

**Exemption 2 – Surveys, Interviews, Educational Tests, or Observation**

This exemption covers 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 Sec.\_\_.104(d)(2):

* 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;
* 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; or
* 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, and an IRB conducts a limited (expedited) IRB review to make the determination required by § \_\_.111(a)(7).

**Protocol/Project Title** Click or tap here to enter text.

**Principal Investigator Name** Click or tap here to enter text.

1. **Confirm that your research involves the collection of information ONLY using one or more of the following:**
* **Surveys** (information collected through questionnaires, in person or online)
* **Interviews**
* **Focus Groups**
* **Educational Tests** (cognitive, diagnostic, aptitude, achievement)
* **Observation of public behavior** (e.g. a public place where there would not be an expectation of privacy such as a public street or park but not a public school, a business, or a hospital)

[ ]  **No, my project involves additional procedures (e.g. intervention, data linking, biospecimen collection**. [The project does not qualify for Exemption 2, however, Exemption 3 may apply.]

[ ]  **Yes, my project involves ONLY one or more of these information collection methods.**

(continue to 1a)

**1.a. Does the research involve children?**

[ ] **Yes** (continue to 1b)

[ ] **No** (continue to 2)

**1.b. Is the interaction with children limited to educational tests, or observation of public behavior where the investigator does not participate in the activity being observed?**

[ ] **Yes** (continue to 2)

[x] **No** [The project does not qualify for Exemption 2, however Exemption 1 may apply.]

**2. Does the research involve populations that simply by participating in the study may result in an increased risk of harm from disclosure?** (e.g. undocumented individuals, people who have not yet identified publically that they are LGBTQIA)

[ ] **Yes** [The project does not qualify for Exemption 2.]

[ ] **No** (continue to 3)

**3. Does the research collect information about the subject in such a manner that their identity can be readily ascertained by the investigator, directly or through identifiers linked to the subjects?**  This means that the data are collected with direct identifiers (name, address, email, phone number, social security number, student ID, patient ID) or indirect identifiers, such as a code that can link back to the subject or data elements that could be combined to readily identify an individual (dates, employment history, etc.).

**Select one:**

[ ] **The participants is directly identifiable**

[ ] **The participant is indirectly identifiable (using a code to link back to participant)**

[ ] **The participant is not identifiable (e.g. anonymous).**

**4. Will the research generate information that, if revealed outside the research, could reasonably place the subjects at risk of criminal or civil liability, or damage their financial standing, employability, educational advancement or reputation?** This means that the research involves the collection of sensitive information, about the subject, such as information about illegal behaviors, mental health issues, sensitive health conditions (HIV, STDs), genetic information, or negative opinions/attitudes about employers or teachers. A disclosure of this information outside of the research (breach of confidentiality) could pose legal risks or risks of social stigmatization to the subjects.

**Select one:**

[ ] **The information is not sensitive. (continue to 5)**

[ ] **The information is sensitive. (**requires limited review & Data Management and Security Plan, **continue to 5)**

**5. Will the research involve the access, collection, use, maintenance, or disclosure of University of Vermont Medical Center or University of Vermont protected health information (PHI)?**

[ ] **Yes** (requires limited review & Data Management and Security Plan, continue to 5a)

[ ] **No** (continue to 6)

**5.a. Investigators are required to only obtain the minimum necessary data in order to achieve the goals of this research. Please explain why the PHI you are obtaining is the minimum necessary to achieve the goals of the research.**

Click or tap here to enter text.

**6. Provide a brief summary of your research (include description of subject population, process for recruitment, study procedures, location of research).**

Click or tap here to enter text.

**7. Describe consent/HIPAA process.**

Click or tap here to enter text.

**8. Will subjects receive payment or other incentives for their participation in the study?**

[ ] **No** (continue to 9)

[ ] **Yes** (continue to 7.1)

**8.1 Estimate the maximum total payment and specify funding source.** Click or tap here to enter text.

**8.2 Please indicate what information you will be collecting from subjects (e.g. social security number, address) to allow payment for their participation.** Click or tap here to enter text.

**9. Upload documents (e.g. survey, information sheet, interview questions, Data Management and Security Plan if PHI, Data Use Agreement if sharing data beyond the institution).**