

September 28, 2020

Principal Investigator: Keith Lance

Sponsor: Colorado Department of Education

Protocol Number: IMLS grant # LG-97-18-0127-18

Study Title: "PRISM: Are PRISon Libraries Motivators of pro-social behavior and successful re-entry?"

Dear Mr. Lance:

The above-referenced study has been determined by Christopher Martin, Pharm.D., M.S., BCPS to be exempt according to 45 CFR 46.104:

Exempt Category #2

Research that only includes interactions involving the use of 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:

- (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, or reputation; or
- (iii) The information obtained is recorded by the investigator in such a manner that the identity of the human subjects can be readily ascertained, directly or through identifiers linked to the subjects, and an IRB conducts a limited IRB review to make the determination required by 46.111(a)(7).

Although you chose Exempt category # 5 the reviewer did not have enough information to confirm that you met this category. However, since your survey is not collecting identifiable information, he indicated the above category more appropriately meets your project.

In addition, the informed consent was reviewed as part of the exempt application.

RESPONSIBILITIES OF PRINCIPAL INVESTIGATOR:

- (1) Submit for review by IntegReview all modifications to the protocol or consent form(s), when applicable, if planned changes to an exempt study might make that study non-exempt from human subject's research, prior to the implementation of the change;
- (2) Protect the confidentiality of all personally identifiable information collected and train your staff and collaborators on policies and procedures for ensuring confidentiality of this information;

If you have any questions please feel free to contact our office at 512-326-3001.

Sincerely, Victoria Govea, CCRP Director of Operations

Electronically signed by Victoria Govea, CCRP on 9/28/2020 6:18:30 PM

Note: Electronic signature above is a Part 11 compliant signature produced via IRBManager.

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