

Checklist to determine if nominated dataset qualifies as Not Humans Subject Research material.

1. The research is not regulated by the Food and Drug Administration (FDA).
 YES NO

AND

2. No one at the NBER will have access to identifiable information and one or more of the following apply (check all applicable boxes):

The researcher(s) receive de-identified data or specimens.

- The following factors will be considered to be certain that the data files (as released to users) have been effectively de-identified for analysis by secondary users:
 - Identifiers of a human subject or of persons named by a human subject have been removed. YES NO
 - Variables or combinations of variables that could serve as surrogates for the identity of a human subject have been removed. YES NO
 - Categories of a variable that might identify a human subject being in a small set of persons with specific attributes regarding a variable have been collapsed or combined (e.g. low # of subjects in lower or upper result range have been combined). YES NO
 - Have used statistical methods, where necessary, to add random variation to variables otherwise impossible to mask. YES NO
 - Variables that could be linked to identifiers by secondary users have been removed. YES NO

The researcher(s) receive coded data or specimens AND one or more of the following apply:

- The key to decipher the code is destroyed before the research begins.
- The PI and holder of the key enter into an agreement prohibiting the release of the key under any circumstances.
- There are IRB-approved written policies for the repository or data management that prohibit the release of the key.
- There are other legal requirements prohibiting the release of the key under any circumstances.

Are there any restrictions on the use of the data set that indicate identifiability or sensitivity of the data:

- Data is stored by owner of data on secure (locked) data storage and/or password protected computers. YES NO
- Data are allowed to be stored on systems that can be accessed through a computer network system. YES NO
- Researchers have to travel to the archive to obtain access to the data. YES NO
- There are limits on the type of data analysis that can be performed. YES NO

By signing this document you are recommending the NBER IRB determine that the dataset _____ may be added to the list of data sets whose research use does not require IRB review of an exempt determination.

Name of reviewer: _____

Date: _____