From a regulatory perspective, if a study is found to be "exempt," then there is no requirement for informed consent.

However, many believe there is still an ethical directive to engage in some sort of consent process for exempt research. The extent of the consent process would depend on the risk of the research, the perceptions of the potential subjects, as well as practical considerations of time and impact on subject recruitment.

Many IRBs handle this by developing guidelines to include in their SOP.
In other words, if a project is exempt and we're satisfied that the procedure meets our collective ethical standards, we need not insist on the investigator satisfying all of the elements of informed consent under the regs? That is my understanding based on a PowerPoint presentation entitled "IRB Flexibility" by G. Pospisil that appears:

http://www.aera.net/aera.old/humansubjects/courses/APS.htm

but we would feel more comfortable receiving confirmation from you.

Thank you!

-- JB

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