**Research on Human Subjects Narrative**

Essentially, a PI has two options:

1. The PI thinks that the use of human subjects does not rise to the level of requiring IRB approval, i.e., her project would be “exempt research”, and she will have to provide justification (a narrative) for this being the case. USDOE will decide if the justification suffices.
2. The PI thinks that the use of human subjects does rise to the level of requiring IRB approval, i.e., her project would be “non-exempt research”, and she will have to provide a detailed description (a narrative) of how she intends to protect the human subjects. Essentially, this narrative is most of the content that would be submitted for an IRB application.

A simpler description for the non-exempt narrative is found at <http://www2.ed.gov/policy/fund/guid/humansub/hrsnarrative1.html>.