Simplified Decision Chart
Exempt VS. not (ethical responsibility w/both)
6 categories at 45 CFR 46.101
Researchers need confirmation of exemption

In all cases, participants are living humans:

Normal educational practices
(e.g., comparing effectiveness of teaching methods, interventions, programs)
Nonprogrammatic, Internal Use
or
Data are collected anonymously or confidentially
(& reporting results won’t hurt person’s reputation)
or
Using existing data, records from public or person cannot be identified
AND
The procedures do NOT involve risk to the participants physically, emotionally, or legally

Research is likely exempt, yet you should still take the CITI tutorials
OHRP Decision charts:
http://www.hhs.gov/ohrp/humansubjects/guidance/decisioncharts.htm