

As stated in the manuscript and in the submission fields, the CCF-STTG1 Cell line is purchased from ATCC, the American Type Culture Collection. <https://www.atcc.org/products/all/CRL-1718.aspx#generalinformation>

The NMSU policy is posted on the web page: <http://compliance.research.nmsu.edu/IRBexempt>

Item 4 applies: "4. Existing Data or Specimens

Research involving the collection or study of existing data documents, records, pathological specimens, or diagnostic specimens, if these sources are publicly available or if the information is recorded by the investigator in such a manner that subjects cannot be identified, directly or through identifiers linked to the subjects. "

The screenshot shows a web browser window with the URL research.nmsu.edu/IRBexempt. The page title is "Categories of Exempt Research Activities". The content is organized into four numbered sections:

- 1. Educational Practices**
Research conducted in established or commonly accepted educational settings, involving normal educational practices, such as:
 - (a). research on regular and special educational instructional strategies, or
 - (b). research on the effectiveness of or the comparison among instructional techniques, curricula, or classroom management methods.
- 2. Surveys, Questionnaires, Interviews, Observational Studies**
Research involving the use of educational tests (cognitive, diagnostic, aptitude, achievement), survey procedures, interview procedures, or observation of public behavior unless:
 - a. information obtained is recorded in such a manner that human subjects can be identified, directly or through identifiers linked to the subjects; and
 - b. any disclosure of the human subjects' responses outside the research could reasonably place the subjects at risk of criminal or civil liability or be damaging to the subjects' financial standing, employability, or reputation.
- 3. Educational Tests**
Research involving the use of educational tests (cognitive, diagnostic, aptitude, achievement), survey procedures, interview procedures, or observation of public behavior, if:
 - a. the human subjects are elected or appointed public officials or candidates for public office; or
 - b. federal statute(s) require(s) without exception that the confidentiality of the personally identifiable information will be maintained throughout the research and thereafter.
- 4. Existing Data or Specimens**
Research involving the collection or study of existing data documents, records, pathological specimens, or diagnostic specimens, if these sources are publicly available or if the information is recorded by the investigator in such a manner that subjects cannot be identified, directly or through identifiers linked to the subjects.

On the right side of the page, there is a sidebar menu with the following items: Conflicts of Interest, Export Control, Responsible Conduct of Research, Human Subject Research, Animal Care & Use, Biosafety, Radiation Safety, Chemical Safety, Frequently Used Information, Uniform Guidance, Finding Funding, Managing Finances, Research Governance, VP Research Units, NMSU Systems Links, and Agency Links.

NIH states the following: <https://humansubjects.nih.gov/human-specimens-cell-lines-data>

"Research that proposes the use of human cell lines available from the American Type Culture Collection or a similar repository is not considered human subjects research because the cells are publicly available and all of the information known about the cell lines (perhaps, including the donor) is also publicly available."

The screenshot shows a questionnaire page with a sidebar on the left containing navigation buttons: Investigator, Institution, Peer Review, Special Awards, and a green button with a checkmark labeled "Am I doing Human Subjects Research? Questionnaire". The main content area is titled "QUESTIONS" and contains the following text:

+ When does research with human specimens, cells, cell lines, or data involve human subjects?

- What are examples of research involving human specimens, cells, cell lines, or data that would not be considered human subjects research under HHS regulations at 45 CFR Part 46?

Research that proposes the use of only cadaver specimens is not human subjects research, because, by definition, human subjects must be "living individuals." Research involving cadaver specimens, therefore, is not regulated by 45 CFR Part 46, but may be governed by other Federal, state and local laws.

Research that proposes the use of human cell lines available from the American Type Culture Collection or a similar repository is not considered human subjects research because the cells are publicly available and all of the information known about the cell lines (perhaps, including the donor) is also publicly available

Research that proposes the use of established cells from a donor whose identity cannot be readily ascertained by the investigator is not considered to be human subjects research, either, for example, because there are written IRB-approved policies and procedures prohibiting release of identifiers or an agreement specifying that identifying information will not be shared with the investigator.