Answers to Frequently Asked Questions about IRB and IPA's Policies on Phone Surveys

Q: How long will it take for IPA's IRB to process and approve my application for a COVID-19 project?
The IPA IRB team must conduct the typical risk assessment of submissions, which requires a thorough review of study protocols, surveys, and consent forms. However, we are trying to turn around reviews and approvals more quickly than usual, and our Board Chair is trying to provide his final approval on submissions within three days. This is not a guaranteed turnaround time because it depends on the number of submissions.

Q: What is the most secure configuration for any device using SurveyCTO during remote data collection?
If you are unable to defer in-person data collection, set up Mobile Device Management (MDM) and Mobile App Management (MAM) technologies on remote surveying devices, or collect data using SurveyCTO web forms, then IPA recommends using the SurveyCTO Collect application on devices under the following configuration:

- Device is full disk-encrypted and password-protected: These device settings should be turned on for IPA devices. It is likely not possible to require full-desk encryption if remote data collection requires the use of enumerators' personal devices.
- SurveyCTO Collect 2.70.2 or above is installed: You can download the SurveyCTO Collect application [here](#) at any time. As of writing, SurveyCTO Collect 2.70.2 is in early release.
- Device passcode is required through SurveyCTO: You can require this in the Configure tab's "other" server settings. You should still enable this even if you set up passcodes on IPA devices.
- SurveyCTO application passcode is required: You can require this in the Configure tab's "other" server settings.
- Each device has a unique SurveyCTO log-in: Every device/enumerator should have an individual log-in, with "Data collection only" permissions. You can read SurveyCTO's documentation [here](#).
- SurveyCTO form is encrypted: You should encrypt SurveyCTO forms using SurveyCTO public-private key pairs. You can read SurveyCTO's documentation [here](#) and IPA guidance [here](#).
- Un-encrypted preloads are not in use: Unencrypted preloads are typically not allowed, and you should avoid them if possible. However, because of the requirements of case

management during remote surveying, IPA is temporarily suspending this guidance. See [below](#) for more information.

- Calls are made using a call masking service: To avoid unnecessarily sharing contact information between enumerators and respondents, IPA recommends using a call masking service such as Exotel (and the [SurveyCTO field plug-in developed by J-PAL for use with Exotel](#)).

Once data collection is completed, you must remove all data from the devices used for data collection. This includes:

- Changing all passwords to "Data Collection Only" logins. Since all enumerators have logged in to their app through their username and password, you must change all passwords so that enumerators can no longer use their login to access the preloaded data or collected data. You can do this on the Configure tab of your SurveyCTO server.
- Deleting the SurveyCTO Collect app. The SurveyCTO Collect app holds all data in app-specific storage, so deleting the app will ensure that the data can no longer be accessed from the device. If you are using personal devices, it is very important to instruct enumerators to delete the app **AFTER** you have ensured all data has been sent to the server.

Q: Can enumerators use their personal devices for calling respondents and sending them SMS messages?

A: Yes, but it is not preferred. You should consider health risks and make the best and safest possible effort to provide IPA devices for calling (such as a SIM-card enabled IPA tablet, an IPA tablet with data and an internet connection for voice-over-IP calls, or an IPA-issued mobile phone or SIM card) before resorting to using enumerators' devices. If none of these is possible, then you may rely on interviewers' personal devices, while using an IPA tablet for data collection. If possible, use a masking service on the interviewers' device to mask phone numbers, such as Exotel (and the [SurveyCTO field plug-in developed by J-PAL for use with Exotel](#)). Interviewers should request that respondents add the interviewer number to their contacts as "IPA interviewer" or a similar professionally appropriate name. The use of personal devices should be noted, along with masking protections or other protective steps, in an IRB application or amendment. Specific training should be conducted to explain the security and privacy concerns to enumerators and ensure that phone numbers are only used for surveying and removed from the phone afterward.

Q: Can enumerators use their personal devices for entering survey data?

A: No, but there can be exceptions. Discuss with the IRB early in the process if a government lockdown prevents you from delivering IPA devices to interviewers. The lowest risk option for collecting data using enumerators' personal devices, if your enumerators have reliable internet, is to submit forms through SurveyCTO Web forms. IPA is also exploring the use of Mobile Device Management (MDM) and Mobile App Management (MAM) technologies that may allow tighter control of data collection applications installed on a non-IPA device, but these options should be discussed and approved before implementing with both your IRB(s) and with IPA's MIST team. For any case where personal devices are used to collect survey data, your IRB

application or amendment should detail additional procedures to ensure strong password protection and wipe protected data from their devices at the end of data collection (such as visiting the IPA office after lockdown). It is also important, whether using IPA or personal devices, to make sure every device has *its own SurveyCTO login*, rather than using one login across all devices. The SurveyCTO login cannot be a login that would allow an enumerator to access the server.

Q: Can I use unencrypted pre-load data on my SurveyCTO forms and devices?
A: Yes, in some cases; this is a temporary loosening of the restriction during extraordinary circumstances where assignment/tracking sheets cannot be printed and delivered. You should already know that SurveyCTO does not encrypt pre-loaded data such as respondent names and contact information that are used to pre-populate SurveyCTO forms. During the current COVID-19 pandemic, defined as the period during which IPA has halted in-person surveying in your country, these unencrypted pre-loaded datasets attached to SurveyCTO forms may be stored on IPA devices. These pre-loaded datasets may also be stored on enumerators' personal devices, but only if personal device use has been approved by your IRB(s), and only if the only preloaded information is limited to the minimum necessary contact information to initiate calls (such as name, nickname, location, phone number). Once data collection is completed, all passwords for enumerator logins must be changed so they can no longer access preloads.

Q: What constitutes informed consent on a phone survey?
A: Oral consent over the phone is permitted; enumerators should have a field to indicate the respondents' response to the informed consent, as is standard for in-person surveying. The consent form checklist has been modified to accommodate phone or web methods and can be found here. Consent form examples (only accessible to users with an IPA email address), can be found here (CATI example) and here (web survey example).

If an audio audit is being conducted for any surveys, the interviewer should notify the respondent that the call is being recorded for quality control purposes and only begin recording after respondent consents. If the survey is conducted over the phone, staff should also confirm with the respondent whether s/he is in a location where they can privately answer the questions. Local country laws should be consulted to determine if recording calls (with consent) is permitted.

Q: Can I use specialized software to conduct text message (SMS) or interactive voice recording (IVR) surveys?
A: If you plan to use any software other than SurveyCTO, ODK, or Qualtrics, then you must consult with the MIST team to conduct a data privacy and security evaluation.

Q: What video-conferencing services can I use for qualitative data collection?
A: IPA has approved the use of Google Hangouts, which is available through our G-Suite subscription. We do not allow the use of Zoom for confidential video interviews. Contact MIST for requests to use other services.

Q: Do I need to submit an IRB amendment if I switch from in-person to phone survey?
A: It depends. Amendment submissions **do not** need to be submitted if:
1. The study is only shifting protocol from in-person to telephone survey with IPA-issued devices.
2. The only consent form change is projects are moving from in-person to telephone procedures.
3. The only survey change is eliminating questions
4. **NOTE:** All projects who do not submit amendments must indicate the changes they've made in their renewal/brief progress report when the time is appropriate.

Amendment submissions **do** need to be submitted if:
1. The project is federally funded (even if you're making minimal changes)
2. You're adding/editing questions to surveys
3. You're making additional changes to consent forms
4. You're using interviewers' personal devices
5. You're making changes to the incentives (e.g. from a bag of sugar or a bar of soap to an electronic gift such as airtime or a gift card)

Additionally, the transition from field to other surveying methods will likely change the data security protocols mentioned in the original protocol, especially if non-IPA equipment is used. Please update those procedures and submit them in your amendments as well. This includes which devices will be used, how they will be password protected, and how data and any preloaded data will be wiped after data collection.

Q: Are there any specific ethical considerations with COVID-related questionnaires?
A: Some questionnaires related to COVID-19, especially those asking about measures to reduce virus transmission and respond to symptoms, run the risk of sending confusing messages or reinforcing misinformation. The IRB has issued the following guidance to study teams in this situation:
1. If respondents provide information inconsistent with WHO guidelines/recommendations for isolation/quarantine or seeking medical care, enumerators will need to provide respondents with information.
2. Projects should have plans/information for respondents regarding WHO guidelines/recommendations for self-care, social distancing, self-quarantining, seeking medical care, etc.

Q: Can I contact respondents using numbers I collected from a previous survey, for a purpose unrelated to the original study?
A: It depends. In many cases the new study may be considered spam (unwanted contact) and re-using respondents' contact information in this way could reduce respondents' trust and willingness to participate in all future survey research. Review the original consent language to determine if it allows for re-contacting respondents for any purpose. In the introductory script,

the new study must explain the respondent's earlier consent and why it was necessary to contact them by phone, and then request to re-consent for the current purpose.

Q: Can I contact respondents using numbers that another researcher obtained from a previous survey for a different purpose?
A: If the original consent allowed for follow-up and the new research team is substantially different from the original research team, then you cannot contact respondents from the previous survey. The consent was given to the original research group, and allowing new researchers access to respondents' phone numbers changes the expectations of sharing subject information. Also, the current study team requires written permission from the original study team to re-contact sample members.

Any questions not answered here can be directed to humansubjects@poverty-action.org.