

Covenant College Survey-Gatekeeping Policy

Introduction. The Covenant College community is relatively small and, in many ways, quite unique. The latter makes it appealing to researchers who wish to recruit participants from our rare demographics (e.g., students who attend Christian college, faculty who endorse the reformed doctrinal tradition, staff members who work on a mountaintop campus). Accordingly, we receive many requests by researchers at other institutions who wish to recruit participants from our community. A policy is needed to balance our desire to contribute to good and interesting research on the one hand with the need to limit the demands upon our community on the other hand.

Purpose. The purposes for this policy are (a) to protect the privacy and participant-rights of members of the Covenant College community, (b) to monitor and regulate survey frequency and to minimize survey fatigue within our community, while (c) promoting collegiality and supporting good science and effective collection and management of data by scholars at other institutions.

Definitions and scope. For the purpose of this document the “community” is defined as all students, alumni, staff, and faculty of Covenant College. A “survey” is defined as the gathering of information through questionnaires, interviews, focus groups, research tests or tasks, with the goal of generalized knowledge or making inferences about a population.

Policy Statement

No survey or other feedback-collection instrument may be implemented within the community unless it meets one of the following criteria:

- a. It is implemented by a Covenant College faculty member, or a student under the supervision of a faculty member, and it has been approved by the Covenant College Institutional Review Board (IRB) through the typical protocol-application-and-review procedure;*
- b. It falls outside the Common Rule definition of research, such as requests for responses from individuals at the point of service (e.g., feedback at the end of an event or a program); or course evaluations and similar instruments for instructional assessment or quality control; or information collected for the purposes of Covenant College administration, advancement, or regulatory compliance.*
- c. It is requested by a researcher outside of the community who has obtained IRB approval from that researcher’s home institution and approval from the Covenant College Survey Control Subcommittee (SCS).*

SCS membership. The Survey Control Subcommittee (SCS) is an ad hoc committee that consists of, at a minimum, (a) the Covenant College Institutional Review Board (IRB) chair or designee(s) thereof, and (b) the Covenant College employee administratively responsible for the unit in which participant recruitment is proposed. Additional SCS members can be appointed if needed. For instance, requests to recruit from Covenant’s student body would be reviewed by the Dean of Students and the IRB chairperson. Requests to recruit student participants from a specific major would be reviewed by the Dean of Students, the chairperson of the department of interest, and the IRB representative. Requests to recruit potential participants from staff members would be reviewed by the Human Resources Director and the IRB representative.

SCS approval process. Any researcher, external to our community, who seeks approval from SCS should send (a) a description of the proposed survey, (b) IRB approval documentation from the home institution, and (c) a letter of intent to the Covenant College Institutional Review Board at irb@covenant.edu. The IRB chairperson will appoint the SCS for the specific request and will distribute the materials to SCS members. Decisions will be communicated electronically or in print through the Covenant College IRB. Requests for recruitment should be made at least two weeks in advance of the anticipated delivery date, although approval by the SCS may take longer than two weeks.

All members of the SCS must review and approve of the proposed research recruitment; otherwise, the proposal shall be rejected. Rejected proposals may, at the discretion of the SCS, be added to the list of “available studies”

published on the IRB website. Of course, members of the Covenant community can choose to volunteer for studies on this list; however, no active direct recruitment of participants (e.g., by mail, email, or phone) is permitted without SCS approval. If all members of the SCS approve the proposed recruitment, the researcher shall be informed, including of any conditions or restrictions.

The survey instrument, IRB approval documentation, and the letter of intent must, at a minimum, provide satisfactory answers to the following questions:

- a. Is the purpose of the survey clear? Will it be clear to the prospective participants, and will they understand that participation is entirely voluntary?
- b. Is there specific justification for data collection from the Covenant College community? Note that there are many data-collection demands already on our community, so there should be strong and specific reasons to allow external investigators to recruit from our community.
- c. Is there IRB approval for the study from the researcher's home institution, and is there anything in the proposal that the Covenant College IRB would disapprove as written?
- d. Will the proposed survey interfere with other approved (or likely to be approved) research surveys or activities? For example, are the demands on potential participants so great that they would be unlikely to volunteer for research conducted by Covenant College investigators?

Relationship to IRB policies. Prior to starting any research involving human subjects, researchers must receive approval from the home institution's IRB. Separate review and approval of the protocol by the Covenant College IRB is not required; however, the Covenant College IRB's representative(s) may certainly request additional clarifying information from the investigator or that investigator's IRB and may vote to disallow a request that would likely not be approved by Covenant's IRB. Researchers must adhere to the details of the approved protocol, must seek approval from the home IRB, and provide notification to the Covenant College IRB, for any changes in the protocol.

General principles and guidelines for survey design: The Rights of Respondents

- The survey form must include "contact information" (name, email address, telephone number), so respondents can ask questions about the content of the form or about the use and/or publication of survey results.
- All participants must be notified that participation is voluntary. Note that potential participants' right to refuse or to discontinue participation is not altered by the fact that their administrative supervising official permit recruitment within the community.
- Respondents must be notified in advance if their identifying information is to remain associated with the data after it is collected, and this fact must be approved in advance by the home IRB and the Covenant College SCS.
- Respondents must be protected from risk of unreasonable harm, including any risks regarding confidentiality or privacy.
- Collection of information may be subject to Federal Family Educational Rights and Privacy Act (FERPA) regulations. Non-public student data can be used without the student's consent by college employees for "legitimate educational" purposes only, and only if the data are not reported in such a way that individual students can be identified. All other users must receive written consent from the students to access their non-public student data.
- Surveys that request individual health information may be subject to Health Insurance Portability and Accountability Act (HIPAA) regulations.
- A summary of research results should be made available on request to persons who completed the survey.

- Respondents should be notified before they complete a survey if publication or distribution of the data or survey results is expected. The notification should include an indication of whether individual responses will appear in the published results.
- In some circumstances, data may be confidential and may not be made available publicly or to the respondents. Any such limitation should be made clear to respondents at the time the survey is conducted, as well as within the report itself. When restrictions apply, publication and/or presentation of survey results must honor the stated restrictions.
- If subjects are promised anonymity and a login is required to access a survey, the researcher must ensure that login information will not be collected and stored in a way that it can be connected to survey results.

Data Security

Survey administrators must store data securely and use data only for the designated and intended purposes. Survey administrators must agree to adhere to federal, local, and institutional policies for handling data. Data containing participant names, identifying information, e-mail addresses, or other confidential information must be saved in a secure format, and normally such data should reside only on computers or drives that belong to the university (data transfers to other media should follow institutional policies). All of these data should be disposed of when the project's IRB approval expires. The investigator must specify how contact information for potential participants will be secured during the approved study period and destroyed when the study is concluded (i.e., at the end of the approved recruitment or study period, whichever is shortest).

Sponsorship

- All surveys should clearly identify the groups or people who will be recruited for potential participation in the survey.
- The use of the name "Covenant College" on a survey instrument or cover letter suggests an official survey being conducted by the university. Use of the name on the survey requires separate approval from SCS.
- Information from surveys conducted by administrative offices, faculty committees, and other university committees are the property of Covenant College. The researcher, department, unit, or committee responsible for conducting the survey must be consulted prior to the release or distribution of the survey's findings.
- The use of mass e-mailing lists to promote or distribute a survey to Covenant College faculty, staff, or students is limited to official surveys approved by SCS.

Confidentiality

- Personally identifiable information should be collected only as required in relation to the expressly stated purpose of research or a project.
- The use of prizes or other incentives to encourage participation typically requires the collection of personal information from the respondents (i.e., name or email address). If the respondents have been promised anonymity, collection of this information may appear to be a violation of the promise. Two methods are typically used to circumvent this apparent conflict:
 - Respondents are assured that their participation and responses will be confidential, but not anonymous. In this sense, 'confidentiality' means that none of the information collected can be associated with a specific individual.
 - A double-blind procedure is developed in which a second party ensures that the analyst does not see any personally-identifiable information.

Post-approval process: procurement of contact information for recruitment of potential participants. After SCS has approved a survey to be offered within the Covenant College community, the researcher may obtain the necessary research-subject contact information from an authorized source (typically from the unit representative who served on the SCS). After receiving the contact information, the researcher is required to treat that contact information as sensitive data under federally mandated rules for data management. The researcher may not use the information for any reason or purpose other than the approved research project.
