Calvin University Survey Gatekeeping Policy

Purpose. The purpose of this policy is threefold:

- (1) to protect the privacy of community members,
- (2) to monitor and regulate survey frequency (and minimize survey fatigue), and
- (3) to ensure the safe collection and management of data.

Definitions and scope. For the purpose of this document the "community" is defined as all students, alumni, staff, and faculty of Calvin *University*. A "survey" is defined as the gathering of information through questionnaires, interviews, or focus groups to make 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 Calvin faculty member or student and seeks responses from fewer than 30 individuals within the community;
- b. It requests responses from clients at the point of service (e.g., at the end of an event or a program);
- c. It is a course evaluation form;
- d. It will be used only to collect information for the purposes of Calvin University administration, advancement, or regulatory compliance.
- e. It has been approved by the Survey Control Team (SCT).

Relationship to IRB policies. Even when abiding by this policy, researchers are subject to separate, federally mandated requirements relating to the protection of human subjects. The primary goal of the IRB is to protect the welfare and dignity of human subjects. A secondary goal of the IRB is to assist investigators in conducting ethical research that complies with applicable regulations. Therefore, prior to starting any research involving human subjects, researchers must receive approval from the Institutional Review Board (IRB). Moreover, IRB approval of any project lasts for one year at most; approval of any longer-term project must be renewed annually.

SCT membership. The Survey Control Team (SCT) includes the dean for research and scholarship (or designee thereof), the IRB chair (or designee thereof), the director of institutional effectiveness/analytics, and various "oncall" representatives of programs that facilitate the wellbeing of Calvin students and employees.

SCT approval process. Anyone seeking approval from SCT should send (via e-mail) a description of the proposed survey and a letter of intent to the dean for research and scholarship at Calvin University. After these materials are in hand, the dean will consult with the chair of the IRB and other members of SCT to determine whether (and when) the proposed survey may be implemented. The decision process can be expected to take up to three weeks.

Decisions will be communicated through the office of the dean for research and scholarship.

The survey instrument and the letter of intent should provide satisfactory answers to the following questions:

- a. Is the purpose of the survey clear? Will it be clear to the prospective participants?
- b. Will the survey results be useful for planning or improving services? For something else?
- c. Is the survey well-designed and of an appropriate length? Does it follow sound survey methods and practices? Are the questions easily understood and interpreted?
- d. What is the target population? Will an entire population or a smaller sample be surveyed?
- e. What actions will be taken to ensure the confidentiality of the responses?
- f. When will the survey be conducted? Will the proposed survey interfere with other surveys or activities?
- g. How will the results be used?
- h. Will the findings be disseminated to appropriate audiences? Who will have access to the information?
- i. Has the IRB approved the project? Is such approval necessary?
- j. Can the proposed survey be combined with other planned surveys?
- k. Would existing data serve the intended purposes and eliminate the need for the proposed survey?
- I. Does the survey follow the college's policy for collecting and managing data?

Post-approval process: procurement of data from Calvin databases. After SCT has approved a survey to be fielded within the Calvin community, the researcher may obtain the necessary research-subject contact information from an authorized Calvin data manager. Faculty and staff information must come from Human Resources (humanresources@calvin.edu), whereas student information is handled through the Office of the Registrar (successcenter@calvin.edu). Requests for data should be made at least one week in advance of the anticipated delivery date. After receiving the contact information, the researcher is required to treat it 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.

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.
- Respondents must be notified in advance if their identifying information is to remain associated with the data after it is collected.
- Respondents must be protected from risk of unreasonable harm, including any risks regarding confidentiality or privacy.
- If a survey or subsequent analysis will include academic or contact information for Calvin University students, it 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 HIPAA (Health Insurance Portability and Accountability Act).
- 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.

Sponsorship

- All surveys should clearly identify the groups or people who are conducting the survey.
- The use of the name "Calvin University" 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 SCT.
- Information from surveys conducted by administrative offices, faculty committees, and other university committees are the property of Calvin University. 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 Calvin University faculty, staff, or students is limited to official surveys approved by SCT.

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.