

VAMHCS RESEARCH SERVICE BULLETIN #18

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VA Prohibits Consent Documentation Using Survey Monkey and Other Information Regarding Use of Surveys for VA Research

Issued by Special Advisor for Policy and Emerging Issues [7/6/2013]:

Recently ORD has received a few questions regarding the use of Survey Monkey. Below you will find some information that may be helpful.

- Survey Monkey has not been approved by OI&T for investigators to use to conduct surveys involving VA research subjects.
- Survey Monkey currently can only be used for internal surveys of VA staff. When used for internal staff surveys the responses must be stored on VA servers and the survey cannot collect any PII or PHI.
- All commercial web-based survey services must be approved by OI&T prior to being used to collect VA research data.
- Surveys conducted for research purposes can be subject to the Paper Work Reduction Act if they involve greater than 9 persons. If the collection of information does not meet the criteria for exemption, the survey must be approved by OMB prior to an investigator using the survey in a VA approved research study. The final determination regarding PRA compliance (i.e., the survey being subject to PRA requirements or the survey being exempt from PRA requirements) is made by the PRA compliance liaison in Central Office. The PRA liaison is also the person who must assist an investigator in submitting the survey to OMB for approval if that is required. For more information on the PRA requirements see the following website: <http://www.hhs.gov/ocio/policy/collection/infocollectfaq.html>

There was also a question regarding the use of Survey Monkey in obtaining consent and HIPAA authorization. ORD has not approved the use of Survey Monkey to obtain consent since Survey Monkey usage has not been approved by OI&T. As indicated in VHA Handbook 1200.05 Paragraph 33 documentation of informed consent must be by use of VA Form 10-1086. The HIPAA authorization must be obtained from the individual for use and disclosure of PHI and the authorization must be signed by the individual. (see VHA Handbook 1605.1 paragraph 14d for more information on who can sign the authorization).