ILLINOIS

OFFICE OF THE VICE CHANCELLOR
FOR RESEARCH & INNOVATION

Office for the Protection of Research Subjects
805 W. Pennsylvania Ave., MC-095
Urbana, IL 61801-4822

Virtual Resources Guidance

The university offers several virtual platforms researchers can utilize to complete their research safely and effectively. During the return-to-work ramp-up of research, PIs and other research team members will need to consider what parts of their studies can be replicated virtually. To reduce the number of people on campus, and the risk to our community, all researchers should continue to collect data virtually when at all possible. To help researchers navigate the options available, OPRS has conducted a needs assessment for the research community and can provide suggestions on different virtual platforms that have been vetted for security, privacy, and effectiveness. Because research on campus has varying levels of complexity, this guidance will not be comprehensive and may not speak to your specific case. If you have specific questions about how to conduct your study in the safest manner, please reach out to OPRS for a consult. This guidance will be updated as new information and resources become available.

If you would like to understand more about the classification of your data, we recommend you University System Cybersecurity classifications here - https://cybersecurity.uillinois.edu/data_classification.

Please note that for the purpose of our specific recommendations pertaining to human subjects research we have expanded on considerations involved in classifying your human subjects data.

Minimal Risk Research (Sensitive):

For research that can be conducted virtually and does not present risk to subjects and/or require the collection of high-risk data, campus has a variety of research tools available to use. Most minimal risk surveys do not require the official documentation of a signature on the consent form. Researchers may submit a Waiver of Documentation of Consent with the justification as to why a signature is not possible to obtain. Please note that although documentation of consent is not required, most research will still require consent information be given to the participant to read and acknowledge.

High-Risk Research:

For research conducted virtually that presents an elevated risk to subjects, greater precaution should be taken when collecting data. Surveys, interviews, etc., that use sensitive questions or require the storage of high-risk data (HIPAA, GDPR) need to be conducted using the university's most secure platforms. These studies typically require a formal signature from participants and some studies must adhere to additional regulatory requirements for consent, such as 21 CFR Part 11.

When conducting research virtually, researchers should evaluate their procedures to determine which virtual resources should be utilized for their specific data collection. Below is a more robust chart to help researchers in making this decision:

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Characteristics	Classifications	Recommendations
Survey-based research No more than minimal risk Adult participants, no vulnerable populations FERPA Data	**Level 1 Survey: "Sensitive"** OPRS considers most information collected from human subjects to be of minimal risk or "sensitive" as classified by the University System data classification system	**Collection:** Qualtrics (if internet capable); Survey Monkey, MTurk, or USPS Mail (If no internet) **Consent:** Online consent, verbal consent script + information sheet, or information mail cover sheet. Waiver of Documentation of Consent **Storage of Identifiable Data:** University-Maintained Cloud-based server (e.g., Illinois Box)
Survey-based research Protected Health Information (PHI) / HIPAA applies European Union General Data Protection Regulation (GDPR) applies More than minimal risk research Surveys conducted with a vulnerable group (e.g., children) Surveys ask for high-risk, personal information such as: Immigration status, illegal activity, health diagnoses (physical or mental).	**Level 2 Survey: "High Risk"** Per the University System data classification system, "Inappropriate handling of this data could result in criminal or civil penalties, loss of federal funding, reputational damage, identity theft, financial loss, invasion of privacy, and/or unauthorized access to this type of information by an individual or many individuals." For the purpose of this guidance, OPRS expands upon the characteristics to include special populations and human subjects research considerations that need to be addressed to conduct the research online.	**Collection:** REDCap **Consent:** REDCap e-consent (documenting consent online) **Storage of Identifiable Data:** Box Health Data Storage Folders
Interview or Focus Group No more than minimal risk	**Level 1 Interview or Focus Group: "Sensitive"**	**Collection:** Microsoft Teams, Zoom (following OPRS guidance on secure use), phone (if no internet)

Adult participants, no vulnerable populations Any disclosure of the participant's responses outside the research would not reasonably place the subjects at risk of criminal or civil liability or be damaging to the subjects' financial standing, employability, educational advancement, or reputation [45 CFR 46.104(d)(2)(ii)]		**Consent:** Waiver of Documentation of Informed Consent, email information sheet/ICD in advance, request verbal consent before initiating interview or focus group. Request explicit consent to be recorded, documented by the investigator. **Storage of Identifiable Data:** University-Maintained Cloud-Based Server (e.g., Illinois Box). Required to transcribe, de-identify, and destroy recordings as soon as possible.
Interview or focus group research Protected Health Information (PHI) / HIPAA applies European Union General Data Protection Regulation (GDPR) applies More than minimal risk research Interviews/focus groups conducted with a vulnerable group (e.g., children) Interviews discuss high-risk, personal information such as: Immigration status, illegal activity, health diagnoses (physical or mental). Focus groups discussing these topics online is not recommended (lack of confidentiality/privacy controls). Populations unlikely to be have access to internet, SMART phones, computers, or have the	**<u>Level 2 Interview or Focus Group: "High Risk"</u>**	**Collection:** Depends on study protocol and population – Microsoft Teams For non-tech savvy participants or those without access: VSee kit for temporary use (to be dropped-off and picked-up by investigator using social distancing precautions) *****Would require personal investment in VSee kit– no current University License.*** **Consent:** E-consent: Microsoft Teams or REDCap documenting consent online as well as explicit agreement to be recorded. **Storage of Identifiable Data:** Health Box Data Folders with approval of IRB as to timeline to transcribe, de-identify, and delete recordings permanently.

ability to utilize an online platform.		
Does not fit into one of the above categorizations Risk to be determined case-by-case as well as feasibility of remote data collection methodology Physiological Monitoring Eye tracking Ethnographic research	**Miscellaneous**	**Collection:** Depends on protocol, could involve use of a VSee Kit. **Consent:** Tailored to protocol and population. **Storage of Identifiable Data:** Tailored to protocol and population.

** Vsee has a transportable kit that could be rented to allow investigators to provide a secure resource to conduct an interview remotely. VSee is noted to be easy to use for all possible participants, however, the university does not currently have this technology or license, so researchers will need to invest personal funds for this service.

Virtual Resources Quick Chart:

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Qualtrics, Survey Monkey, MTurk

- Minimal risk surveys
- Collection of e-consent (Waiver of Documentation)

Microsoft Teams, Zoom

- Minimal risk interviews/focus groups
- High risk interview/focus groups (with additional security mechinisms)
- Collection of verbal consent (Waiver of Documentation)
- Collection of e-consent through file-sharing (Waiver of Documentation or PDF signature)

REDCap

- High risk surveys (HIPAA, GDPR)
- Collection of e-consent (Signed, FDA Part 11 compliant)

UIUC Resources:

Office for the Protection of Research Subjects (OPRS)/IRB Website

OPRS COVID-19 Guidance

OPRS Use of Zoom Guidance

Division of Research Safety (DRS) Website

DRS COVID-19 Guidance

Office of the Vice Chancellor for Research and Innovation (OVCRI) Website

OVCRI COVID-19 Guidance

UIUC COVID-19 Website

National and State Resources:

CDC Coronavirus Website

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Illinois Coronavirus Website

NIH/NSF FAQs - Coronavirus

Office for Human Research Protections (OHRP) COVID-19 Guidance