



Evaluation Ethics: A Guide for City Government

Research ethics prompts



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Using this guide

Why should you use this guide?

Basic understanding of research ethics is an integral part of running evaluations. This guide is a starting point to identify potential ethics concerns as you design your own evaluations.

When should you use this guide?

We recommend using this guide and worksheet to do an ethics review early in the evaluation project planning and again as you refine your evaluation design.¹

How should you use this guide?

Use this guide to learn about what human subjects research and what ethical human subjects research looks like. Then, at the end of this guide, there is a worksheet with an example so you can work through the ethics of your own evaluation. If you are not able to confirm your evaluation complies with any item in the list, you will want to take follow-up action to mitigate the potential ethics risks.

Who should you involve to ensure an ethical evaluation?

For additional support to manage evaluation ethics risks, you may want to consult with:

- Your city's legal counsel if there are potential legal concerns about the project.
- Your city's IT specialists for questions on data security risks and how you might mitigate them.
- Community stakeholders such as people or organizations who would be the subject, have an interest in, affect, or are affected by your research (e.g., for a public transit study: transit riders, transit workers, transit union leaders).
- A BIT evaluation coach can help you adapt your evaluation plan to mitigate ethics risks. They may also help you determine if you will need International Review Board (IRB) approval or if you should involve external evaluators.

¹ Note: This guide is aligned to guidance and definitions from the US and Canada, which has substantial overlap with international standards. If conducting research in other countries, be sure to reference local human subjects research guidelines.

What is human subjects research (HSR)?



To be considered human subjects research, an evaluation must have two characteristics:

1. Human Subjects
2. Research

Human Subjects

An evaluation that focuses on human subjects:

- Focuses on living individuals' behaviors, experiences, characteristics, or preferences
- Often involves interaction or intervention with individuals to collect data and observations
- May involve personal or identifiable data on individuals.

It is possible to involve people in your evaluation without making them the subject of investigation. See Table 1 for examples of evaluations where humans are and are not the subject of the research.

Table 1. Are Humans the Subject of the Research?

Example	Are humans the subject?	Rationale
Evaluation 1: We call a school administrator and ask her for data on the average tenure for teachers and staff.	No	This does not meet the definition of a human subject because the subject of study is about the school, not about the administrator or individual teachers.
Evaluation 2: We call a school administrator and ask about her training, experiences, how she thinks about school organization, and how she manages stress.	Yes	This does meet the definition of a human subject because the subject of study is about the individual administrator.

If you aren't sure whether your evaluation involves human subjects or whether you are interacting with and collecting data from individuals, still complete the worksheet to minimize risks to participants.

Research

Research can be defined by the following characteristics:

- Is a systematic investigation that is planned in advance (i.e., you design a methodical and structured approach to answering a research question)
- Generates scientific knowledge that can be applied in other settings

In other words, your evaluation is testing an intervention, service, or program to determine whether it is effective and can be used elsewhere.

Table 2 describes common monitoring & evaluation (M&E) activities carried out by government that may or may not count as research:

Table 2. Common M&E Activities within Government

M&E Activity	Example	Is it research?	Rationale
Quality Assurance (QA): Comparison of performance or outcomes against a standard.	A city monitors water quality levels.	No	This is an ongoing activity to ensure that water management is performing well. QA may sometimes motivate research. For example, if there were an uncharacteristic worsening of water quality in specific parts of the city, the department of water management may conduct interviews and observations at water treatment sites.
Quality Improvement (QI): Systematic, data-guided activities designed and implemented to monitor, assess, and improve the quality of services, processes, or programs.	A city wants to test a simplified design of at-home water testing kits for residents and measure the impact of the new design on the rate at which residents return kits with sampled water.	Sometimes	The city's question is whether or not a change within an existing program improves that program. To answer that question rigorously, they will have to plan a systematic investigation. The key to whether this is research is whether the city intends for the findings to be applied in other settings.
Program Evaluation: Systematic evaluation conducted to answer questions about projects, policies, and programs—particularly their effectiveness and efficiency.	A city evaluates the effectiveness of a new wastewater treatment policy on water quality.	Sometimes	The city's question is whether or not a policy improves a given outcome. To answer that question rigorously, they will have to plan a systematic investigation. The key to whether this is research is whether the city intends for the findings to be applied in other settings.
<p>If you are conducting QA, QI, or evaluation activities to test a new, modified, or previously untested intervention or program to determine whether 1) it is effective for your city, AND 2) whether it can be used elsewhere, your activity is likely to be considered research. This is especially true if you involve academic collaborators or research institutions in your evaluation project. A study can be QI or program evaluation and research at the same time.</p>			



What does ethical evaluation look like in city government?

Even if your evaluation doesn't clearly meet the definition of human subjects research, we recommend aligning to the ethical principles outlined in the [The Belmont Report](#) (US) and the [Tri-Council Policy Statement](#) (Canada). These documents identify the basic ethical principles and explain ethical guidelines concerning research with human subjects. These principles are:

- **Respect for Persons**
- **Beneficence / Concern for Welfare**
- **Justice**
- **Community Engagement**

The table below describes and provides examples of each of these principles.

Table 3. Basic Ethical Principles of Human Subject Research

Principle	Definition	Example
Respect for Persons	Individuals have the right to choose whether to participate in research, and persons with diminished autonomy (e.g., children, people with disabilities) are entitled to protection.	<p><u>Example of respecting individuals' choice to participate:</u> We want to survey parents of school age children to understand parents' perceptions of school safety. We would really like to gather a lot of data, and while we could falsely state that parents MUST complete the survey by a deadline, this would not respect their autonomy and ability to choose. Instead, we state that we would appreciate their response and clearly describe the purpose of the survey and their right to not participate at the beginning of the survey.</p> <p><u>Example of protecting persons with diminished autonomy:</u> We want to survey high school students to understand their perceptions of school safety. When seeking to obtain the assent of children to participate in research, we often need to provide additional protections. For example, we would not simply provide similar information as was provided to their parents in the previous example. We would simplify the language, so that a child could understand it. Other examples of protections include translating documents to other languages or providing other supports such as interpreters and reading aids.</p>



Principle	Definition	Example
Beneficence / Concern for Welfare	Individuals are treated in an ethical manner by respecting their decisions, protecting them from harm, and making efforts to ensure their wellbeing. Researchers aim to do no harm, maximize possible benefits, and minimize possible harms	We want to study the effectiveness of our high school's curriculum on sexual and reproductive health. We conduct 1:1 interviews instead of focus groups with the students to protect their privacy. Any data we collect is not linked to their identity to protect their anonymity. We do not interview children in front of their parents.
Justice	The costs and benefits of the research are designed to be justly distributed. In other words, research conducted on a sample of residents (i.e., those who bear the costs of the research and are at risk of potential harms in the research process) should benefit that population of residents.	<p>We want to study the impact of a road barrier on traffic fatalities. The priority areas of the city where the road barriers should go are in areas where residents have protested their installation; they think they are an eyesore and are skeptical of the benefits of the road barriers. There are low-income areas of the city where you know there will be less community pushback, so you test them there.</p> <p>The road barrier works, and afterwards you uninstall them and place them in the high-income, priority areas. This would NOT uphold justice on one hand, because the low-income area was treated as a convenient experimental site that could have experienced a negative impact, and on the other hand, because they ultimately did not benefit from the research since the road barrier was removed.</p>
Community Engagement	For research that is likely to affect the welfare of a community or communities (e.g., Indigenous peoples or other protected groups), researchers should engage community members to inform research design and partner on implementation and use of the results.	We want to conduct a study on access to public housing among Indigenous communities in a city. Tribal councils and Indigenous civil society organizations may partner with the city council to co-create, implement and use the results of the housing study.

Whether or not your evaluation activity is technically HSR, your evaluation should still aim to uphold these ethical principles. Depending on your jurisdiction, HSR will often involve specific oversight requirements, and prescribe specific safeguards or procedures to ensure these principles are applied. If your evaluation is not HSR, then you may have more flexibility to think about how to satisfy these principles.

For example, informed consent is a common procedural requirement in HSR to satisfy the Respect for Persons principle. However, your city may be conducting M&E using administrative data collected as part of regular operations. You may not need to secure informed consent from all the individuals involved, but you should consider:

- Whether the data is being used in a manner that does not align with the original data collection's purpose or intentions, and
- Whether data subjects were informed about the ways the City would use that data, both at the time and in the future. This would often be through privacy notices or data acknowledgements.

If we are using the data in a way that would surprise the data subjects, we should reconsider the activity or plan for additional levels of notification or consent.

Research Ethics Worksheet



In this section, we'll illustrate the application of these principles to a city evaluation. In the right hand column, you can fill out your city's approach.

Describe Your Evaluation		
Step & Guidance	Example – Mystic Falls	Your Approach [Fill in this column]
<p>What do you want to evaluate? What are you seeking to learn?</p>	<p><i>The impact of an SMS to residents at risk of eviction that encourages them to call the 611 helpline which connects callers to support services.</i></p>	
<p>Who / what will be the subjects of the evaluation? About whom or what are you seeking to learn what you described above?</p>	<p><i>Residents of Mystic Falls at risk of eviction (identified by a predictive model based on water bill payment history)</i></p>	
<p>Does this evaluation interact or intervene with human subjects? If not, does this evaluation involve the use of personal data of living humans?</p>	<p><i>Yes</i></p>	
<p>What is the primary purpose of the evaluation? Is it to inform decisions about a specific program or practice, for example, or is it to produce generalizable knowledge that could be applied to other settings?</p>	<p><i>Primarily to inform decisions about how best to help residents at risk of eviction</i></p>	
<p>How will you evaluate? Will any data be collected that is not regularly collected?</p>	<p><i>We will conduct a randomized controlled trial where we randomly assign residents at risk of eviction to either receive the SMS or not. We will then identify whether or not a resident in our sample calls 211 within a month of receiving the SMS.</i></p> <p><i>We already log phone numbers that dial 211.</i></p>	

Respect for Persons

Step & Guidance	Example – Mystic Falls	Your Approach [Fill in this column]
<p>Consent: Does this study involve any level of coercion, undue influence, deception, incomplete disclosure, or covert data collection? Will you seek informed consent from participants? Why or why not? If you will seek informed consent, please include the process by which it was obtained.</p>	<p><i>We will not seek informed consent from residents to participate in the evaluation. We will have access to the phone numbers that the water department already has, and we will consider this evaluation to be part of a quality improvement activity.</i></p>	
<p>Opt-out: Can participants opt out before, during, and after the research process? Can participants decline to answer particular questions or decide to end the task? Outline the process.</p>	<p><i>When residents receive the texts, they'll be able to request to opt out of future SMS, not the research.</i></p>	
<p>Vulnerable Populations²: Does this study involve vulnerable populations? If so, what protections are in place to protect these individuals?</p>	<p><i>Economically disadvantaged</i></p>	

Beneficence

Step & Guidance	Example – Mystic Falls	Your Approach [Fill in this column]
<p>Sensitive topics: Does this study involve sensitive topics (e.g., previous drug use, exposure to violence, etc.)? Sensitive topics may pose a risk to participants' psychological well-being. Therefore, evaluations that involve sensitive topics may require additional ethical review.</p>	<p><i>Yes, eviction and economic insecurity are sensitive topics. We are trying to provide residents with relevant resources, so we cannot omit the reference. However, we will avoid framing the messages such that they cause undue stress (e.g., over emphasizing their risk of eviction).</i></p>	



² Vulnerable populations include pregnant women and fetuses, children, prisoners, people with diminished mental capacity, and those who are educationally or economically disadvantaged. They may also include Indigenous peoples. There are special protections for these populations which require additional ethical review for evaluations to proceed.

<p>Sensitive / protected data: Does this study involve protected health information, educational records, data collected from children under the age of 13, financial information, or utility usage data such as electricity usage, heating, etc? If so, this evaluation may require additional ethical review.</p>	<p><i>Yes, utility usage data to identify residents</i></p>	
<p>Data security: Do you have data protection procedures in place, such as using a secure data sharing platform, encrypting your data, password protecting folders? Can data with PII be accessed by individuals outside of your evaluation project team? Describe how you will protect data.</p>	<p><i>Economically disadvantaged</i></p>	
<p>Risks / Mitigation strategies: Are there any other risks that could negatively affect the evaluation subjects? If so, describe them and the mitigation strategies you'll have in place.</p>	<p><i>No</i></p>	
<p>Stopping rules: Under what conditions would you stop the evaluation?</p>	<p><i>Reports of harm as a consequence of the SMS</i></p>	

Justice		
Step & Guidance	Example – Mystic Falls	Your Approach [Fill in this column]
<p>Selection of participants: Are some classes of persons being systematically selected for or excluded from participation? If yes, is this for reasons directly related to the evaluation question or for other reasons?</p>	<p><i>Yes, we are excluding individuals from areas that historically have the highest rates of poverty. We would rather target more intensive supports to those residents (e.g., active outreach by phone call). Based on the results of this study, we will consider scaling the intervention to include these residents.</i></p>	



<p>Sharing of evaluation benefits: How will participants benefit from participation in this evaluation, in the short-term or long-term? Will you make efforts to ensure that the findings are shared with them? If not, please outline why.</p>	<p><i>If the intervention works, we will send the SMS to residents of the control group</i></p>	
<p>Scaling: Could scaling or adapting the intervention or practice in a new context present new ethical concerns? Explain your rationale.</p>	<p><i>If the intervention works, we will scale the message to be sent to residents at risk of eviction currently and in the future. We might need to expand the languages that the resources are available in and figure out how to target SMS versions by language.</i></p>	

<h2>Community Engagement</h2>		
Step & Guidance	Example – <i>Mystic Falls</i>	Your Approach [Fill in this column]
<p>Community welfare: Is this likely to affect the welfare of a community or communities (e.g., Indigenous peoples or other protected groups)?</p>	<p><i>We hope that this improves the welfare of low-income groups. The evaluation does not systematically focus on specific ethnic groups or protected groups.</i></p>	
<p>Community engagement: If the answer to the above question is yes, how will you engage community members (e.g., to inform research design or partner on implementation and use of the results)?</p>	<p><i>We will user-test messages with a small group of end users to ensure that the messages do not trigger undue stress and to gather feedback for refining of the messages.</i></p>	

Additional Ethics Resources

- [Youtube: What is research, what isn't, and, who is a human subject anyway? Explaining Common Rule terms \(HHS\)](#) - 40 minute comprehensive video explaining human subject research
- [Ethical & Quality Evaluation Standards \(Better Evaluation\)](#) - Description of ethical and quality evaluation
- [Informed Consent FAQs \(HHS\)](#) - Responses to common questions about what informed consent is, when / how to obtain informed consent, grounds for waiving informed consent, etc.
- [Human Research Protection Training \(HHS\)](#) - Online training on human research protections based on the requirements of ethical standards governing human subjects research in the US. *(Certification granted upon completion. Training is free. Full training takes ~5-6 hours.)*
- [Course on Research Ethics \(Tri-Policy Council Statement\)](#) - Online course covering ethics guidance that is applicable to all research involving human subjects according to standards in Canada. *(Certification granted upon course completion. Training is free. Full training takes ~4 hours.)*