

September 2, 2020

Re: “Enforcing Payment for Water and Sanitation Service in Nairobi’s Slums” – IPA IRB response to concerns

A recent working paper, titled “Enforcing Payment for Water and Sanitation Services in Nairobi’s Slums” has been the subject of concerns related to research ethics. The IPA IRB was one of two independent review committees that provided oversight for the study under which the manuscript was prepared. The other IRB was Maseno University Ethics Review Committee. In regard to the concerns that have been expressed, the IPA IRB would like to share information related to the approval of the study’s research protocol.

This study was originally approved by the IPA IRB in December 2013. An amendment to the protocol was received on June 19, 2018 to add a new study component, focused on methods to increase customer repayment of water and sewer services and loans in order to ensure sustainable services. Because the proposed amendment involved gathering data on the disconnection of vital services for study subjects it was reviewed by the full board to ensure a broad discussion of the criteria for IRB approval. Of particular concern was whether the study design minimized risks to subjects and that the proposed risks to subjects were reasonable to anticipated benefits, if any, to subjects and the importance of the knowledge that may reasonably be expected to result. The amendment submission was updated with additional requested documentation on July 13, July 14, and again on July 17.

At the July 26, 2018 board meeting, the IRB discussion focused on the risk that service disconnection represented to subjects. From the submission, the IRB understood the subjects were all individuals who were already at risk of service disconnection due to non-payment and that the decision to disconnect service for non-payment was not introduced because of the research. The intervention associated with the study was to assess whether different approaches to enforcement and encouragement might improve repayment behavior. IRB members raised questions about the disconnection rates and the study's potential influence on these rates and did not initially approve the amendment. Instead questions about the study’s potential impact on disconnection rates, particularly whether study participants would be more likely to be disconnected, were conveyed by email to the principal investigators (PIs). In a subsequent written submission, the research team clarified that study participants were not more likely to be subject to disconnection as a result of the study. With this information it was determined that, other than the randomized rollout, the study would not affect the disconnection decision. Further, the intervention held out the prospect of motivating individuals to address their non-payment and avoid disconnection of service, a potential benefit. With these findings the amendment was approved on July 31st (although due to a clerical error it was dated July 26th) and the approval letter was sent to the PI.

Signed,

Members of the Innovations for Poverty Action Institutional Review Board (IPA IRB)