HML Ethics Review Board

Research Ethics Review Document

Review of UNICEF Research Project Materials for the Protection of Human Subjects

v.2023.2

This document serves to meet UNICEF ethical standards in research and is the official record of an ethics review. It is designed to ensure effective processes and accountability for ethical oversight and to ensure the protection of, and respect for, child and adult rights within all research, evaluation, and data collection processes undertaken or commissioned by UNICEF. It conforms with the UNICEF Procedure for Ethical Standards in Research, Evaluation, Data Collection and Analysis; Document Number: CF/PD/DRP/2015-001; Effective Date: 01 April 2015, Issued by Director, Division of Data, Research and Policy.

The Purpose of Research Ethics Review

The purpose of an Ethics Review Board (ERB) or Institutional Review Board (IRB) is the protection of human research subjects' rights. These rights include *Respect* for individuals to make free decisions, *Justice or equity* regarding distribution of the burdens and benefits of research, and *Beneficence* or the obligation to do good and avoid harm.

ERBs review research protocols that involve the collection and analysis of data from human subjects to ensure that ethical standards are upheld. This is to protect the rights and welfare of subjects and to ensure that:

- subjects know the purpose of the study and are not placed at undue risk;
- participation is voluntary and confidential;
- subjects are provided and agree to informed consent prior to their participation;
- relevant protocols are in place to assure subjects' protection and safety, and;
- data collection and analysis does not result in the violation of privacy or discrimination.

Before issuing approval, the ERB must determine that the following requirements are satisfied:

- informed consent is sought from each subject or the subject's legally authorized representative;
- the proposed research design is scientifically sound and that risks to subjects are minimized;
- any risks to subjects are reasonable in relation to anticipated benefits;
- subject selection is equitable;
- safeguards are included for subjects likely to be vulnerable to undue influence or coercion;
- subjects' safety, privacy, and confidentiality are maximized.

Materials Requested for Review:	Also, please include:
1. Inception Report / Research Protocol, containing, e.g.,: specific aims or objectives, research questions, study design, subject recruitment, subject protection and data protection plans. 2. Copies of all Informed Consent documents. 3. Copies of all data collection instruments.	4. Written protocols to ensure subjects' safety.* 5. Written protocols for the protection of human subjects' identities.* 6. Written protocols for the protection of data.* 7. Other relevant documents. *These may be statements incorporated into research plans and/or embedded in a single protection protocol. .

HML IRB is an autonomous committee authorized by the United States Department of Health and Human Services, Office for Human Research Protections (IRB #1211, FWA #1102, IORG #850), to review and approve research involving human subjects before the start of research, and to conduct annual reviews of that research independent of affiliation with the research organization submitting materials for review.

Please submit your materials in English for review to:
D. Michael Anderson, PhD, MPH, HML IRB Chair & Human Subjects Protections Director
and Penelope A. Lantz, JD, HML IRB General Counsel
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UNICEF Research Ethics Review for Human Subjects' Protections

→ **INVESTIGATORS: Please confirm your project information and any additional information requested below.**

Section 1	**Project Overview** **Please provide any requested information**	
1.1	**Project Title:**	***Endline Evaluation of the Adolescents and Youth Life Skills Programme (Maharati)***
1.2	**HML IRB Research Ethics Review ID#:**	776JORD23
1.3	**Initiating UNICEF Official:** Name, office, email	Emmanuel Saka
1.4	**Principal Investigator/Project Manager:** Name, degree(s), organization, & address	Lisa Pfister Research Programme Coordinator Samuel Hall FZE P.O. Box 4422, Fujairah / United Arab States
1.5	**Other Key Personnel:** Names & titles	Hervé Nicolle Marion Guillaume Lisa Pfister Mohamad Al-Quaroti Devyani Nighoskar Ahmad Awad Seif Aly Rana Samara Majd Haddad Majd Masannat
1.6	**Contracting Firm:** Name & address	Samuel Hall FZE P.O. Box 4422, Fujairah / United Arab States

1.7	**Primary study site(s):** CO, RO, countries	Jordan, Governorates: Amman, Zarqa, Irbid, Mafraq. Tafilah, Karak
1.8	**Project duration:** Dates from -- to	01/06/2023 – 01/03/2024
1.9	**Duration of Subjects' Participation:** Dates from -- to	02/09/2023 – 23/09/2023
1.10	**Thematic Area/Areas:**	Education Gender Choose an item.
1.11	**Target population:**	Young people (aged 10 to 23 years) who participated in the Maharati programme in Jordan

Date of ERB Request	25 August 2023
Date(s) ERB Comments Returned	30 August 2023
Date Final Documents Received	05 September 2023
DATE OF ERB APPROVAL	06 September 2023

UNICEF Ethics Review Process

HML Ethics Review Board (UNICEF LTAS 42107154) will conduct a research ethics review of submitted materials and make comments below under **Additional Information Needed**. We will then return this template for responses from investigators.

Please respond to our comments in another colour, directly under each comment.

Please provide any requested or revised materials, and please note where revisions to your materials may be found by page or paragraph number.

Please do not alter ERB comments or the format of this document.

	Ethics Review Board Criteria of Interest	Additional Information Needed → Investigators: Please respond to ERB info requests in another color directly below the request	X or NA equal PASS (for ERB use)
Section 2	***ERB Submission:*** **Are all requested project information, materials, and final documents provided separately or incorporated in text? This includes:**		
2.1	**Inception Report or Research Protocol……..……X** e.g.,: specific aims or objectives, research questions, study design, analysis & dissemination plans		X
2.2	**Informed Consent documents……..…X**	Please provide consents for youth subjects who will participate in a videography. Consent forms for both photos and videos were developed and we will submit them attached.	X
2.3	**Surveys and data collection instruments……..…X**	Your table on p.2 of the qualitative tools identifies focus groups with youth beneficiaries. Will you conduct these? If so, please provide the focus group guide. FGDs will be conducted with Parents and caregivers of adolescent and/or youth beneficiaries (female/male), not beneficiaries.	X
2.4	Written protocols to ensure subjects' safety		X
2.5	Written protocols for protection of subjects' identities		X
2.6	Written protocols for protection of data		X
2.7	Other relevant documents		X
2.8	Is *UNICEF Procedure for Ethical Standards* cited? Cited		X
2.9	Have informed consent and data collection instruments been pre-tested? a. yes……..……..X b. no……..…..……..	Please respond. The instruments will be piloted once finalized based on ERB feedback. Please note that the Youth Advisory Board was involved in the data collection tool finalization	X

	c. NR……..……..	to ensure that we already had feedback from youth on the tools directly.	
2.10	Are all submitted documents final versions? a. yes……..…….. b. no……..…..…….. c. NR……..……..	Please respond. The tools are pending pilot feedback.	X
2.11	May the final protocol and instruments be included in an internal UNICEF searchable database for colleagues to learn from your work?	Please respond: INCLUDE or OMIT? INCLUDE	X
2.12	Additional comments or suggestions		X
Section 3	***Research Design:*** **Do submitted materials describe the proposed research? This includes:**		
3.1	Is the study's background, rationale, and study design scientifically sound?		X
3.2	Type of data collection: a. survey questionnaire……..……..…..X b. subject interview……..…….. c. key informant interview (KII)……..……..…..X d. focus group discussion (FGD)……..…..…..X e. secondary document (desk) review……X f. on-site observation…… g. case study……...X h. physical measurements …….. i. biological specimen ……..…… j. other..……..X Youth videography project		X
3.3	Is the type of data collection appropriate for this study design?		X
3.4	Are secondary data (desk review including documents, reports, publications):	Please respond. The desk review draws from all three sorts of documentation. When data with PII was used, care was	X

	a. publicly available.....…… b. not publicly available containing personally identifiable information (PII)……. c. not publicly available containing no PII.....…….	taken to ensure that all findings detailed in the IR did not include PII.	
3.5	Are types of data and variables in the secondary data set described?	Please respond. Yes the data used from the secondary data for the sampling is described in the sampling sections and documents from the secondary data used in Annex 1 and 4.	**X**
3.6	Is how investigators' access to the secondary data described?		**X**
3.7	If the secondary data contained subject records, did subjects consent to reuse of their data?		**X**
3.8	Does study involve intervention, treatment, comparison, or control groups? a. intervention……..……..…X b. comparison…… c. control…….. d. none……X		**X**
3.9	Number of Data Collections: a. one-time only……..……..……X b. two or more (e.g., pre-post) ……		**X**
3.10	Sample size: Approximate total *n* = 1100		**X**

3.11	Are any subjects children (<18 years old)?.... a. 0 – 2……..……..……..…… b. 3 – 7…… c. 8 – 12…….. d. 13 – 17……X	In your request for ethical review, you identify child subjects starting at age 10. But in the protocols for the survey and case study interviews you identify subjects as 13 and older. What are the ages of your child subjects? Adolescents (13-17 years) and youth (18-24) All focus group subjects are 18 or older, correct? They are with subjects that are 18 years or older. As they are with parents/caregivers and trainers.	X
3.12	Does study include the use of technologies (e.g., on-line data collection or intervention, *U-Report*)?		X
3.13	Additional comments or suggestions		X
Section 4	***Subject Risks:*** **Are risks reasonable in relation to any benefits to subjects and to the importance of knowledge that may be expected to result from the research?**		
4.1	Is the research *Minimal Risk* Only?: This means the probability and magnitude of anticipated harm or discomfort is no greater than ordinarily encountered in daily life or during performance of routine physical or psychological exams or tests.		X
4.2	Does the research involve *greater than minimal risk*, but where risks are justified by anticipated benefits; where the relation of the anticipated benefits to risks is at least as favorable as available alternative approaches; and where the intervention or procedure is likely to yield generalizable knowledge? If so, are mitigating procedures described?		X
4.3	Do study objectives show that risks are reasonable in relationship to expected gains and benefits are clearly articulated?		X
4.4	By their participation, are subjects vulnerable to any of the following?: a. physical risk ……..		X

	b. psychological risk ……..X c. social risk ……..……. d. economic risk ……..…….. e. legal risk ……..…….. f. political risk ……..…….. g. employment risk…… h. academic risk……..... i. religious risk……..…... j. other……... k. none……...		
4.5	In event of any of the above risks, do protocols describe clear strategies to mitigate risks?		**X**
4.6	Does the study request information or opinions where public disclosure may result in danger, limitations to future freedoms, or access to services?		**X**
4.7	Do gender, ethnicity, or other demographic characteristics -- or grouping of subjects by any of these characteristics, especially in FGDs -- increase subject risk?	If you must collect names of focus group subjects, do so individually prior to convening the group. Noted.	**X**
4.8	If a subject discloses or is suspected to be at risk outside the study, are procedures in place to address or report risk and refer subject for relevant support?	What are the referrals that will be available to subjects? legal, financial, psychosocial, psychological	**X**
4.9	Is local reporting abuse of children mandatory? If yes, has consideration been given to the impacts and consequences of mandatory reporting?	Please respond. Reporting abuse of children is not mandatory; however, we ethically report on this. If needed, we can provide grievance numbers for organizations in Jordan that can support in this matter. This is also mentioned in the IC forms.	**X**
4.10	Additional comments or suggestions		**X**

Section 5	***High Risk:*** **When subjects are vulnerable to heightened risk have additional safeguards been included to protect their rights and welfare?**		
5.1	Can subjects be perceived as vulnerable, including: children, especially unaccompanied or separated (UASC); lacking WASH, food, shelter, or medical care; refugees in conflict or post conflict; those in natural, ecological, or disaster settings; mothers & pregnant women; forced migrants and illegal or undocumented immigrants; prisoners or persons in institutions including orphanages or juvenile justice systems; gang members; those with mental or physical illness or disability; those with HIV/AIDS; those at economic or educational disadvantage; persecuted minority groups, or under high familial, peer, or social pressure? If yes, are study-specific protection protocols provided?	Study aims to include children with disabilities as participants in the survey. Please describe safeguards and precautions that will be taken for these children. There will be specific considerations to ensure the research venues are accessible for participants with disabilities. A 5 JOD travel stipend will be provided to participants to ensure that participation in the study does not constitute a financial risk / burden. This is also mentioned in the IR on page 30.	X
5.2	Does the sampling strategy target people at risk for issues such as: violence, torture, abuse, kidnapping; sexual exploitation, harassment, prostitution or pornography, female genital mutilation or cutting, reproductive or sexual issues; sexual orientation; child, early or forced marriage; suicide? If yes, are study-specific protection protocols provided?		X
5.3	Are subjects involved in any of the following: slavery, including the sale and trafficking of children; forced labour, servitude, forced recruitment to armed groups; war or armed conflict; illegal activities, production or trafficking of drugs; economic exploitation; work that could damage health or safety; removal of organs for exploitation? If yes, are study-specific protection protocols provided?		X
5.4	Does the study request information relating to illegal activities? If yes, is an MOU in place with government to ensure that no participant is prosecuted? Have participants been notified of this agreement?		X
5.5	Additional comments or suggestions		X

Section 6	***Recruitment:*** **Do submitted materials describe subjects and the recruitment process?**		
6.1	To what extent are subjects identified: a. names are recorded with responses……. b. names recorded separate from responses……..X c. no names are recorded ..……..……. d. other PII is recorded……..……X e. no PII is recorded …… f. subjects are given a unique identifier.....X g. other…….…….….	Why do you collect name, phone number and other PII of subjects? This information is available on the shared beneficiary data and in the youth centers. They will be used for verification purposes against the beneficiary lists to ensure that the respondents interviewed in the quantitative survey correspond to those expected. Phone numbers may also be used for randomised data checks. Please note that respondents have the option not to disclose these should they not wish to. The final cleaned dataset will eliminate such PII, and previous iterations removed from storage. Similarly for qualitative data such information is collected to be able to conduct verification / follow up if needed during the data cleaning process and subsequently removed. Added to IR on page 33 as well.	**X**
6.2	If subject name or any other PII is recorded, are procedures included for how this info will be kept separate from responses?	When and how are names and phone numbers removed from the survey? This information will be removed from the dataset once cleaned, and previous iterations of the data set removed from storage. Added to IR on page 33 as well.	**X**
6.3	Are subject recruitment procedures & sampling strategy adequately described?	How will you recruit subjects for the survey, focus groups and case study interviews? The data collection team from Mindset will contact the beneficiary youth and adolescents based on the beneficiary list shared by UNICEF. Will you recruit children directly or through a parent/guardian?	**X**

		Beneficiary youth and adolescents will be contacted through either the parent or the guardian given the numbers on the beneficiary list. If the beneficiary is under the age of 18, we will ask the parent/guardian for consent to have their child participate in the study. Will potential subjects be contacted in by phone or email or in-person, etc…? The subjects will be contacted by phone and in-person. All these details are added to the IR on page 30.	
6.4	Do recruitment procedures clearly describe ways and means to ensure privacy of subjects throughout the recruitment process?		X
6.5	If subjects are children or other vulnerable groups, are materials (e.g.: survey instruments, focus group topics, etc.) age appropriate?		X
6.6	If subjects are children or other vulnerable groups, or if subject matter is sensitive, is recruitment sensitive to subjects' potential vulnerabilities (real or perceived) and does it ensure privacy throughout recruitment?		X
6.7	Do recruitment procedures show indication of bribery, coercion, intimidation, compulsion, pressure, or force?		X
6.8	Is recruitment of some members of the population and not others likely to result in resentment for either inclusion or exclusion? Have strategies to address this been adequately described?		X
6.9	Are potential subjects likely to conflate participation with potential or actual goods or service provision? Have strategies to address this been adequately described?		X
6.10	If subjects are paid, compensated, provided a gift, or provided other benefits or services for participation, is the incentive described and justified as non-coercive? a. cash or gift card…….. b. refreshment……..	Any compensation? If so, what and how much? A 5 JOD travel stipend will be provided to participants to ensure that travel to participate in the study does not constitute a financial risk / burden. This is also mentioned in the IR on page 30.	X

	c. travel cost…….. d. phone or internet credit…….. e. small gift…… f. other…….. g. none…….. h. no response……..		
6.11	Additional comments or suggestions		X
Section 7	***Informed Consent:*** **IC is a negotiation whereby subjects are informed about the study and their rights, and they agree to participate voluntarily. IC must be sought from each subject or the subject's authorized representative confirming this process.**		
7.1	Type of Informed Consent: a. written & signed ……..……..X b. written not signed ……. c. written & signed by authorized representative....X d. written with online checkbox……..…… e. verbal & signed or recorded……..…..X f. verbal & signed by authorized representative….X g. verbal not signed or recorded……..…… h. active……..…X i. passive…….. j. other ……..…	Please provide consent forms for the youth videography subjects. They are provided attached. If the videography projects include any identifiers or any people, they are considered humans subjects and consent must be obtained. Please provide the consent form to be used. They are provided attached.	X
7.2	Are the processes for obtaining each IC adequately described?		X
7.3	Does the IC include a clear and simple invitation to participate, an explanation of what the subject will be expected to do, and why they are being recruited?		X
7.4	Does IC include the purpose of the research presented in simple, age, education, and culturally appropriate local language?	Has the IC document for the survey assent been tested with participants aged 13 to 17?	X

		The Informed consent form will be used during the pilot and any concerns around the presentation of the research purposes will be taken into account at that point in time; note that it draws closely from past informed consent forms for similar evaluations in the Jordanian context.	
7.5	Does IC state that participation is voluntary, and subject may choose to not respond to any or all questions or may withdraw anytime without consequences?		X
7.6	Does IC include the expected duration of the subject's participation (hours/minutes)?		X
7.7	Are subjects given a clear indication of who will have access to their responses and in what form?		X
7.8	Are subjects given a clear description of potential re-use or sharing of data, with whom, and in what form?		X
7.9	Does IC include a description of any risks or benefits to subjects?		X
7.10	Does IC include a statement describing how confidentiality (or anonymity) will be maintained, and if there are any limitations to confidentiality?	Annex 3 of the Inception Report names interview subjects. If you name subjects in the final report, please obtain written and signed consent. Noted and we will not name subjects in the final report.	X
7.11	Does IC provide identity and contact info of investigators? Is the form of contact useful and appropriate given power dynamics and access to resources like phones or email?	Please provide contact information. Added to the IC for the qualitative tools and survey.	X
7.12	For child subjects, is IC being obtained from parent, guardian, caregiver, or authorized representative? If not, is a justification provided for why this is unnecessary?	Please obtain written and signed parental consent to take photos. Please provide the form to be used. They are provided attached. Please provide separate parental consent forms for each type of data collection with children.	X

		This is done as there are only two types of data collection planned with children, the survey and the case studies, and there are separate qual and quant consent forms	
7.13	For child subjects, is their role in the study described adequately and in an age and culturally appropriate manner for them to provide written or verbal *assent*?	Please provide age-appropriate assents for case study interviews, the survey, and photographs. The current consent forms and overviews of the project have been designed to be appropriate to adolescent research participants. Please discuss appropriateness of IC document for children with any mental/cognitive disability. Consent will be provided by guardians for children but we will not interview any children who do not have the cognitive capacity to understand the IC as part of this evaluation.	**X**
7.14	Do IC materials advise subjects to keep focus group discussions (FGD) confidential from anyone outside the group?	Please add to IC document for FGDs. Added to the IC form for the qualitative tools.	**X**
7.15	Where subjects differ by type (e.g.: age, sex, risk, status, etc.), are IC documents specific for each type?		**X**
7.16	Where data collection differs by method (e.g.: survey, FGD, interview, audio recording), do ICs cover each method?	Please provide the consent form for photographs. Attached.	**X**
7.17	If IC is written, is a copy left with subjects or there is explanation for not doing so?		**X**
7.18	Additional comments or suggestions		**X**
Section 8	***Subject Protections:*** **Do submitted materials clearly identify protection against risk?**		
8.1	Do materials describe protocols for subjects' safety throughout data collection, analysis, storage, and dissemination?	Will all surveys be conducted in person? If so, please describe how safety of subjects will be assured. In all cases, informed consent must be given before participation. Identifying information will not be shared	**X**

		and used only for verification purposes. Data security protocols will be applied during and after data collection. The research will occur in safe, private, and accessible locations and will be conducted with the approval of UNICEF and local authorities and respecting cultural norms. Research groups of youth and adolescents will be separated by gender and female respondents interviewed by female enumerators in group and individual settings. Furthermore, there will be specific considerations to ensure the research venues are accessible for participants with disabilities and socially acceptable for female respondents to attend	
8.2	Are all data collected necessary for the purposes of evidence generation?		X
8.3	Do data analysis and reporting procedures ensure subject confidentiality (or anonymity) and security?	Will audio files be transcribed? If so, will PII be removed? Yes, and yes, PII will be removed upon validation of the transcript.	X
8.4	If future contact with subjects is planned, does it provide for confidentiality and data security through the research period and beyond?	How will participants be contacted after survey? Please describe how will names and phone numbers be safeguarded. Contact with participants is only planned to clarify / validate data during data cleaning processes, after which point their PII will be removed from all data collected.	X
8.5	Are backgrounds and qualifications of data collectors adequately described?	On p.34 you mention youth researchers. Who are these researchers and how and by whom have they been trained? These are researchers from the Youth Advisory Council set up in conjunction with UNICEF. They have previously been trained by UNICEF on data collection. Added to 4.1 in the IR as well.	X

8.6	Have personnel collecting data from subjects, especially child subjects, had ethical training specific to the target group?	Please describe data collectors' experience and training in working with child subjects. Most of the enumerators have worked on projects with child subjects before and have been trained by UNICEF on PSAA and working with children. As for the remaining, we will ensure to train them on working with child subjects in our training. Added to page 28 in the IR as well.	X
8.7	Are personnel collecting data aware of ethical issues that may arise and provided mitigation strategies?		X
8.8	Additional comments or suggestions		X
Section 9	***Data Protections:*** **Do data collection and storage protocols adequately ensure subject & data safety?**		
9.1	Are data collection tools appropriate and constructed to assure subject confidentiality or anonymity?	What will you do with video or photos submitted without consent from subjects in those materials? No photos or videos should be taken without appropriate consent. Should any such media materials be identified, with subjects identifiable in them, they will be immediately deleted.	X
9.2	Do data collection procedures and environment ensure data security?	Where will interviews and focus groups take place? To ensure the comfort of participating respondents, these will take place in the youth centres and potentially offices of key informants. Added to page 30 in the IR as well.	X
9.3	Do procedures cover all data types (e.g., written, audio, video, observation), and are protections described for each type?	Please describe for all data including photos, audio and video files. This is described on page 33 in the IR for all data types. 159. Samuel Hall will not collect data directly but will apply its data standard to the management and storage of data collected by Mindset during the evaluation. As per its internal data collection policy, data which is provided to Samuel Hall will be used in accordance with	X

		Data Protection legislation. This principle means that Samuel Hall staff and research participants will know who is collecting the research data, where it will be kept, and what will be done with it. Privacy notices will be included on consent forms or associated documents so all parties are aware of how data will be processed. Data will be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality'). Personal data will be kept securely so that no unauthorised access can occur. We collect personal contact information for this purpose, and any such data will be deleted once data verification processes are completed and survey data therefore anonymised. To ensure the security and quality of its data, Samuel Hall utilises a dedicated data management system (DMS) on its own proprietary cloud, hosted on Google's cloud architecture. All Samuel Hall software and collected data reside in Frankfurt, Germany, subject to German and EU privacy laws. The DMS will remain isolated from all other Samuel Hall systems by default. Samuel Hall's Data Protection Policy is provided (Annex 11). 9.5 also details Mindset's data protection policy and is in line with Samuel Hall's procedures. We also attached Mindset's data protection policy for your reference.	
9.4	If data will be shared with partners, is there a clear agreement or NDA?		**X**
9.5	Do protocols describe chain of custody of data and protections for data transfer or transmission, management, and de-identification?	Please describe for all data including photos, audio and video files. Mindset collects, processes, manages, and stores personal information, whether collected electronically,	**X**

		stored on a computer, or existing in hard copy format stored in a physical filing system. Mindset has a mandate to collect personal information fairly, handle it with confidentiality, and use it meaningfully and as necessary while avoiding all possible data breaches or any data handling aspects that can potentially compromise all stakeholders' confidentiality and well-being. Mindset completely abides by the seven general guidelines shown below. Data must: 1. Be processed fairly and lawfully. 2. Be obtained only for specific, lawful purposes. 3. Be adequate, relevant, and not excessive. 4. Be accurate and kept up to date. 5. Not be held for any longer than necessary. 6. Be processed in accordance with the rights of data subjects. 7. Be protected in appropriate ways	
9.6	Do protocols state length of retention and destruction of raw data (months, years)? a. destroyed at end of study……..……. b. destroyed after three years…… c. retained indefinitely……X d. other…….. e. NR	Please respond. retained indefinitely	**X**
9.7	Additional comments or suggestions		**X**