



**OFFICE OF RESEARCH AND DEVELOPMENT
VETERANS HEALTH ADMINISTRATION**

**Guidance for Use of Social Media, Including Facebook or Twitter, and
the Use of Craigslist when Recruiting Research Subjects in
VA Research**

Date: March 9, 2015

This guidance supersedes ORD's March 13, 2013 guidance entitled *Guidance for use of Facebook and Twitter when Recruiting Research Subjects in VA Research*.

For questions on the content of this guidance, email the VHA Office of Research and Development at VHACOORDRegulatory@va.gov

SCOPE: This document describes ORD's current position on use of Facebook, Twitter, and Craigslist when recruiting research subjects in VA research. ORD offers guidance on the following topics:

1. Use of social media such as Facebook and Twitter for recruiting VA subjects.
2. Use of Facebook, Twitter, E-mail, or other social media for prospective subjects to contact the study team.
3. Use of Craigslist to recruit VA subjects.
4. Referral of prospective subjects to other websites in a VA Facebook, Twitter, or Craigslist ad.
5. IRB responsibilities for reviewing recruitment ads using social media including Facebook, Twitter, or using Craigslist.
6. The role of the VA Facility in reviewing recruitment ads using social media including Facebook, Twitter, or using Craigslist.

1. Use of Social Media such as Facebook or Twitter for Recruiting VA Subjects

Many VHA facilities and program offices now have Facebook pages and Twitter accounts. These Facebook pages and Twitter accounts may be used to advertise VA-approved studies and recruit potential participants in accordance with applicable policies regarding use of social media tools. Recruitment ads should only be posted on the Facebook page or Twitter account of the Investigator's VA Facility. VA sponsored sites are monitored by the facility, typically by the Public Affairs Office, to insure that inappropriate information, such as Protected Health Information is not posted. If posting to a program office's Facebook or Twitter account is proposed, ORD recommends contacting the applicable VHA program office regarding the program office's policies and procedures for posting prior to seeking

approval of the recruitment strategy by the IRB of Record and VA R&D Committee. Non-VA-sponsored Facebook pages or Twitter accounts should not be used for recruitment to VA studies since these sites are not monitored by the VA.

2. Use of Facebook, Twitter, e-Mail or Other Social Media for Prospective Subjects to Contact the Study Team

Communication of sensitive information from or to VA by non-encrypted email is not permitted. Non-encrypted email is not secure and cannot ensure confidentiality of the information communicated to or from the individual. If social media such as Facebook or Twitter are used and allows the potential subject to communicate by email, there is no mechanism to prevent communicating sensitive information, including Personally Identifiable Information (PI I) or Protected Health Information (PHI). Therefore, recruitment ads for VA research placed on Facebook or Twitter cannot invite communication with prospective subjects except by phone, mail, or other methods that do not involve personal e-mail or social media messaging. The text of the recruitment script and the context in which the recruitment takes place must be reviewed and approved by the IRB of Record for the applicable study prior to initiation of the recruitment strategy following R&D Committee approval of the study.

My HealtheVet is a VA approved method for VHA providers to communicate by e-mail with Veterans for clinical care purposes, but my HealtheVet cannot be used in VA research to communicate with the prospective VA subjects. My HealtheVet currently does not have research functionalities and is not authorized for use to recruit or contact prospective VA subjects.

3. Use of Craigslist to Recruit VA Subjects

Craigslist can be used as a tool for recruitment in VA research if the use is consistent with applicable laws, regulations, and policies regarding privacy, information security, and human subjects protections. The proper mechanisms must be utilized to prevent sensitive information, such as PHI, from being sent electronically by the prospective subjects in response to the advertisement. Similar to Facebook posts and Twitter messages, Craigslist recruitment ads cannot invite communication with prospective subjects except by phone, mail, or other methods that do not involve personal email or social media messaging. The text of the recruitment script and the context in which the recruitment takes place must be reviewed and approved by the IRB of Record for the applicable study prior to initiation of the recruitment strategy following R&D Committee approval of the study.

4. Referral of Prospective Subjects to Other Websites in a VA Facebook, Twitter, or Craigslist Ad

Facebook posts, Twitter messages, or Craigslist ads used in VA research may refer prospective subjects to other webpages for additional information. Referenced webpages should be on the VA Facility's website, VA program office's website, or other appropriate website (e.g., National Institute of Health, ClinTrials.gov). Referring prospective VA subjects to personal webpages is not an acceptable recruitment strategy.

5. IRB Responsibilities for Reviewing Recruitment Ads Using Social Media Including Facebook, Twitter, or Using Craigslist

The IRB is responsible for ensuring that appropriate safeguards exist to protect the rights and welfare of research subjects. Reviewing proposed methods and materials for recruitment of subjects in human subjects research is an IRB responsibility. There are no specific Federal or VHA requirements describing the IRB responsibilities for reviewing recruitment ads using social media such as Facebook posts, Twitter messages, or Craigslist ads. However, the IRB must review and approve the recruitment ads placed on Facebook, Twitter, or Craigslist using the same principles it applies in reviewing any type of recruitment ad. For example, the ad must not be coercive or misrepresent any anticipated benefits associated with the study. If the ad refers to other websites, the IRB must confirm as part of the review process that the link is appropriate to the study.

Ads placed on public internet-based bulletin boards recruit diverse populations that may include individuals who are not Veterans or U.S. citizens. It is VA policy that only Veterans be entered into VA studies. Only when there are an insufficient number of Veterans and when the IRB has approved entering non-Veterans can non-Veterans be entered into VA studies. Recruitment ads placed on public sites should indicate that VA is recruiting Veterans that qualify for the study unless the IRB has approved the inclusion of non-Veterans into the VA research study.

6. The Role of the VA Facility in Reviewing Recruitments Ads Using Social Media Including Facebook, Twitter, or Using Craigslist

Investigators at VA facilities should contact the VA Facility's Public Affairs Officer (PAO) for guidance on posting ads to a VA Facility's Facebook page, Twitter account, or Craigslist. Mechanisms should be in place to ensure that social media posts such as on Facebook or Twitter, and Craigslist ads for recruiting VA human subjects research activities are not posted until the IRB of Record and VA Facility's Research and Development Committee have approved the study. Maintenance of the Facebook post, Twitter message, or Craigslist ad should follow the standard operating policies and procedures of the local VA Facility or program office.

Regulatory and VHA Policy References:

[VA Directive 6515](#): Use of Web-Based Collaboration Technologies, Section 2d. states that VA personnel and organizations must exercise sound judgment when utilizing Web-based collaboration tools. The use of VA Web-based collaboration tools must promote the mission, goals, and objectives of VA. Such use must also be consistent with applicable laws, regulations, and policy, as well as prudent operational, security, and privacy considerations.

[VA Handbook 6500](#), Risk Management Framework for VA Information Systems – Tier 3: VA Information Security Program Appendix F.2. SC-9: Transmission Confidentiality §(9)(d)1 states that the VA e-mail system will be used for authorized government purposes and will contain only non-sensitive information unless the information is appropriately encrypted with VA approved encryption technologies.