

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

**GUIDANCE FOR USE OF FACEBOOK and TWITTER WHEN RECRUITING  
RESEARCH SUBJECTS IN VA RESEARCH**

**DATE:** February 8, 2013

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

1. Use of Facebook and Twitter for recruiting VA subjects.
2. Use of Facebook or Twitter for prospective subjects to contact the study team.
3. Referral of prospective subjects to other websites in a Facebook or Twitter ad.
4. IRB responsibilities for reviewing recruitment ads using Facebook or Twitter.
5. The role of the VA Facility in reviewing recruitment ads using Facebook or Twitter.

**1. USE OF FACEBOOK OR TWITTER FOR RECRUITING VA SUBJECTS.**

Many VA facilities and 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. 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. 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 OR TWITTER FOR PROSPECTIVE SUBJECTS TO CONTACT THE STUDY TEAM.**

Communication of sensitive information from or to VA by non-encrypted email is not permitted by VA Handbook 6500. There is no mechanism to prevent communicating sensitive information, including Personally Identifiable Information (PII) or Protected Health Information (PHI) from a prospective subject if a Facebook ad or Twitter message allows prospective subjects to communicate with the study team by e-mail, Facebook postings, or Twitter messages. Therefore, recruitment ads 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. My HealtheVet is a VA approved method for VHA providers to communicate by e-mail with Veterans. My HealtheVet accounts or secure messaging communication systems approved by VA may be used to communicate with the prospective subjects.

**3. REFERRAL OF PROSPECTIVE SUBJECTS TO OTHER WEBSITES IN A FACEBOOK OR TWITTER AD.**

Facebook or Twitter recruitment 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.

#### **4. IRB RESPONSIBILITIES FOR REVIEWING RECRUITMENT ADS USING FACEBOOK OR TWITTER.**

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 Facebook posts or Twitter messages. However, the IRB must review and approve the recruitment ads placed on Facebook or Twitter 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.

#### **5. THE ROLE OF THE VA FACILITY IN REVIEWING RECRUITMENTS ADS USING FACEBOOK OR TWITTER.**

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 or Twitter account. A VA Facility's Public Affairs Office should have mechanisms in place to ensure that Facebook postings or Twitter messages 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 or Twitter message should follow the standard operating policies and procedures of the local VA Facility.

#### **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.