



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

**ORD Guidance on Advertisement of Non-VA Research Activity  
in VA Facilities**

**Date:** March 9, 2015

This guidance supersedes ORD's October 20, 2014 guidance entitled *ORD Guidance on Advertisement of Non-VA Funded Research in VA Facilities*.

For questions on the content of this guidance, email the VHA Office of Research and Development at [VHACOORDRegulatory@va.gov](mailto:VHACOORDRegulatory@va.gov)

**SCOPE:** VA is authorized to care for Veterans and to conduct research that supports the mission of VHA and enhances the quality of health care delivery to Veterans. Other Federal agencies and non-Federal agencies conduct and fund research that may be relevant to Veterans.

Improving Veteran access to non-VA research activities may be accomplished by allowing recruitment documents, flyers, or advertisements for research related to Veterans to be posted or distributed at the VA. This may include announcing, distributing, publishing, or advertising the study either electronically, by hard copy, or other means to anyone, including Veterans, clinicians, or other staff. ORD offers guidance on the following topics:

1. How can non-VA research activities be advertised in VA Facilities?
2. Can the non-VA research activities be advertised on the VA Facility's Facebook page?

**1. How can Non-VA Research Activities be Advertised in VA Facilities?**

The posting of flyers, recruiting documents, or advertisements is governed and approved by the local VA facility. The VA Facility Director is responsible for ensuring that a formal process is in place for this activity.

Research offices should:

1. Review outside requests for the posting of recruiting documents, flyers, and advertisements to ensure that the research is relevant to Veterans and the mission of VA and will not impede current VA research activities.
2. Ensure that recruiting documents, flyers, and advertisements for research that is not VA research and will not be conducted at the VA include a clear and legible disclaimer statement that the research is not VA research, will not be conducted

by VA, has not been reviewed by VA's Institutional Review Board, and is not endorsed by VA. VA is not responsible for any costs incurred by a Veteran if the Veteran enters the study as a research subject. The announcement is being provided for information only.

3. Evaluate whether or not the non-VA research activity should be submitted as a VA research activity (e.g., the Principal Investigator for the proposed non-VA activity is also a VA employee (i.e., dual appointee) wishing to recruit subjects at the VA Facility or could conduct some or all of the research at the VA).
4. Follow the local process for posting flyers or advertisements within the facility.

Recruiting documents, flyers, and advertisements for research that is not VA research should be reviewed for relevance to Veterans and inclusion of the disclaimer. They should not be reviewed by the IRB or the Research Committee as if they were VA research. Members of these committees may be asked for input as appropriate.

## **2. Can the non-VA Research Activities be Advertised on the VA Facility's Facebook page?**

No. VA has approved the use of different types of social media, such as VA blogs, Facebook, Twitter, Flickr, and Yammer, to promote the mission, goals, and objectives of VA. When VA is advertising a non-VA study on the VA Facebook pages, it is promoting an activity that is not a VA activity. Hundreds or even thousands of people, including those outside of the intended audience, may see this advertisement. These Facebook posts advertising non-VA research activities can be perceived in a different context than that which was intended. Use of the Facebook pages to promote recruitment into non-VA research activities is not consistent with [VA Directive 6515](#): Use of Web-Based Collaboration Technologies and is not permitted.

### **REGULATORY AND VHA POLICY REFERENCES:**

[VA Directive 6515](#), Use of Web-Based Collaboration Technologies

[VHA Handbook 1200.05](#), Requirements for the Protection of Human Subjects in Research.