Department of Veterans Affairs

Memorandum

Date: April 7, 2020

From: Deputy Under Secretary for Health for Discovery, Education and Affiliate Networks (10X)

Subj: Use of Video Communication Technology for VHA Research and Development Activities Under COVID-19

To: Medical Center Directors
Associate Chiefs of Staff for Research and Development

1. Pursuant to the President's March 13, 2020 declaration of a national emergency concerning COVID-19, VA will be suspending certain FISMA-related controls that restrict the use of non-public facing remote and audio and video communication technology.

2. Effective immediately, VHA personnel engaged in approved research and development, are permitted to use non-public facing remote audio or video communication technology outside of VA network systems as necessary for business and operation continuity, including the sharing of sensitive information, including protected health information (PHI) and personally identifiable information (PII) when use and collection of the PII/PHI is permitted under the study, provided that one or more of the following criteria are met:

- The use of an audio or video telecommunication platform for research interactions or interventions is an adaptation of a current VHA Research and Development Committee approved research project impacted by the COVID-19 pandemic and the use of the platform has been reported to the overseeing research committee or subcommittee.
    - i. *Examples may include: research screening, study enrollment, interventional visits, follow-up visits, or data collection (e.g,. survey-based activities); or*

- COVID-19 related studies that are being designed may include these platforms in the design and continue to use these platforms in accordance with paragraph 7 and at that time must amend their projects to VA Video connect if audio or video telecommunication is still required.

3. VA Video Connect remains the preferential method to conduct video encounters. However, permitted non-public facing remote audio or video communication technology includes (but is not limited to): Apple FaceTime, Facebook Messenger video chat, Google Hangouts video, Skype or WhatsApp. VA personnel must continue to protect Veteran and VA data to the greatest extend possible while using this alternative technology including enabling all available encryption and privacy modes when using such applications. PHI and PII shall not be recorded or stored using audio or video communication technology.

Use of Video Communication Technology for VHA Research and Development
Activities Under COVID-19

4. Applications that are public facing shall not be used to conduct any VA business.
Public facing applications include but are not limited to, Facebook Live, Twitch, TikTok or
similar communication applications.

5. This guidance is consistent with and does not take precedence over the Office of
Research and Technology March 19, 2020 *Use of Video Communication Technology
Under COVID-19* Memorandum (VIEWS 02576895) that addressed use of stated
technologies in support of clinical users.

6. This memorandum authorizes VHA personnel to use personally owned equipment
(POE) in the absence of government furnished equipment (GFE). As a reminder, VHA
personnel are encouraged to notify all parties of the potential privacy and security risks.

7. This memorandum will remain in effect for the duration of the National Emergency or
until guidance from the Department is provided that amends, supersedes, or suspends
this message, whichever occurs first.

8. If you have any further questions about this memorandum, please review the
frequently asked questions on the COVID 19 SharePoint site:
https://dvagov.sharepoint.com/sites/vacovhacomm/admin/projects/covid19. For
questions not covered under the FAQ please direct inquiries to VHA Office of Research
and Development via email at ORDCOVID19@va.gov.

Carolyn M. Clancy, M.D., MACP