

SUBJECT: Non-VA Research Recruitment Material Distribution

1. PURPOSE:

This SOP establishes the procedures for reviewing and approving the posting or distribution of recruitment materials for research which is not under the oversight of the Minneapolis VA Research & Development Committee (i.e., non-VA research) that may be relevant and of interest to Veterans throughout the Minneapolis VA Health Care System (MVAHCS).

2. DEFINITIONS:

ACOS/R: Associate Chief of Staff for Research

AO/R: Administrative Officer for Research

IO: Institutional Official

3. OVERVIEW:

Recruiting documents, flyers, and advertisements for non-VA research must be reviewed and approved prior to being posted or distributed in any form within or on the premises of a VA facility. Posting or distributing 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.

4. RESPONSIBILITIES:

- a) **Administrative Officer for Research:** The AO/R (or the Deputy ACOS/R) will ensure that non-VA research recruitment activities are conducted in accordance with this policy.
- b) **Associate Chief of Staff for Research:** The ACOS/R will provide final approval for the posting or distribution of non-VA research recruitment materials throughout the MVAHCS.
- c) **Deputy Associate Chief of Staff for Research:** The Deputy ACOS/R (or the AO/R) will ensure that non-VA research recruitment activities are conducted in accordance with this policy.
- d) **Medical Center Director:** As the Institutional Official (IO), the Director is responsible for ensuring that a procedure is in place to review and approve the posting or distribution of non-VA research materials.
- e) **Non-VA Investigator:** The non-VA investigator initiating the request to post recruitment materials is responsible for the posting and removal of approved materials. This may be arranged through individual contact with a VA service line or through a VA-affiliated colleague.

5. PROCEDURES:

- a) All outside requests for the posting of recruiting documents, flyers, and advertisements for non-VA research must be directed to the MVAHCS Research Office for review.
- b) The AO/R or Deputy ACOS/R (or designee) will review the request to determine if:
 - i) The research is relevant to Veterans and the mission of VA;
 - ii) The project should be submitted as a VA research activity;
 - iii) The research has the potential to impede other current VA research activities; and

- iv) Assurance/Documentation of the approval of the research by the IRB of record has been obtained.
- c) The request should not be reviewed by the MVAHCS Institutional Review Board (IRB) or any other MVAHCS research oversight committee; however, members of these committees may be asked for input as appropriate.
- d) A summary of the request and the AO/R or Deputy ACOS/R's recommendation will be submitted to the ACOS/R.
- e) The ACOS/R will review the information and make a determination regarding the suitability of posting and/or disseminating the non-VA recruitment material throughout the MVAHCS.
- f) A written response to the request will be provided to the requesting party by the Research Office.
- i) If the request is approved, the following requirements will be communicated:
 - (1) All materials must include a clear and legible disclaimer stating:
"This is not VA research. It 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."
 - (2) That a Posting Expiration Date for a period not to exceed 6 months must be displayed on all materials.
 - (3) That the approved methods of dissemination and/or locations where the material is permitted to be displayed.
- ii) If the request is denied, the rationale for the decision is provided.
- g) Approved non-VA research recruitment materials must be posted or disseminated in accordance with MVAHCS policies and procedures.
- h) The non-VA investigator making the request to post recruitment flyers is responsible for placement and removal of posted materials.
 - i) This may be accomplished via direct contact with an appropriate VA service line, or through assistance from a VA-affiliated colleague.
 - ii) The MVAHCS Research Service will not be responsible for posting non-VA recruitment materials.
 - iii) Approved non-VA recruitment materials may not be posted in spaces reserved for display of VA recruitment materials (such as the Research Recruitment boards).
- i) Research Office personnel will assist by periodically checking for and removing any expired materials posted to notification areas.
- j) In the event that space is needed for posting of VA-sponsored or VA-endorsed recruitment materials, non-VA research recruitment materials may be taken down prior to the 6 month expiration date.

6. REFERENCES:

VHA Directive 1200.05 “Requirements for the Protection of Human Subjects in Research” (07 January 2019)

Office of Research Oversight “Guidance on Advertisement of Non-VA Funded Research in VA Facilities” (9 March 2015)

Minneapolis VAHCS Policy #IM-05E “Public Affairs Program” (19 September 2012)

7. R&D COMMITTEE APPROVAL: 04 June 2019

8. RECISSIONS: Minneapolis Research Service SOP R&D-006 “Non-VA Research Recruitment Material Distribution” (05 June 2018).

9. EXPIRATION DATE: N/A

10. FOLLOW-UP RESPONSIBILITY: Research and Development (R&D) Committee