

VAMHCS RESEARCH & DEVELOPMENT SERVICE  
RDS Administrative Process Module

PM-SRS-036

Effective Date: 9/9/15

Advertising Non-VA Research

Applicable Regulatory Context:

[VHA HB 1200.05 §5.b(5)]:

[The IO is responsible for] Ensuring that a procedure is in place to review and approve recruiting documents, flyers, and advertisements for research that is not VA research 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 (see ORD guidance at <http://www.research.va.gov/resources/policies/default.cfm> ).

[ORD Guidance on Advertisement of Non-VA Research Activity in VA Facilities (3/9/15)]

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.

1. The VAMHCS R&D Service must approve the posting or distribution of flyers, recruiting documents, or advertisements for non-VA research.
2. Individuals who wish to post or distribute flyers, recruiting documents, or advertisements for non-VA research must submit the proposed materials to the R&D Service for review. The following must be included:
  - a. Ensure that the advertising materials contain the following disclaimer:
 

*This 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.*
  - b. Provide documentation that the advertising materials with disclaimer have been approved by the applicable IRB.
  - c. Submit the request, copies of the advertising materials, and IRB approval letter to the R&D Service (Ann Kimball, x6506, [ann.kimball@va.gov](mailto:ann.kimball@va.gov)).
  - d. If the advertisement is approved, follow VAMHCS policy for the posting of materials. See item 4 below.

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- e. “Advertisers” and VA staff must understand that:
  - i. They may not actively recruit participants at the VAMHCS.
  - ii. The non-VA recruitment materials must be for information purposes only: It is up to the person who takes or notices the recruitment material to make contact with the advertised study team.
  
3. The packet of advertising materials is reviewed within the R&D Service and a decision is made on whether to allow the advertisement of the non-VHA research. The R&D Committee (RDC) and the advertiser are notified.
  - a. The R&D Service designees review the documents for relevance to Veterans and inclusion of the disclaimer. Members of the IRB or the Research Committee may be asked for input as appropriate.
  - b. The R&D Service designees decide whether to allow the advertisement, not allow it, or “require changes in order to be posted”.
  - c. The R&D Service designees’ decision is placed on the agenda of the next scheduled RDC meeting for notification to the RDC. The advertisement plus a written review of the advertising materials is provided to RDC members prior to the RDC meeting.
  - d. RDC members may request changes to the advertisement or advertisement plan.
  - e. The RDC does not vote on approval of the advertisement. The advertisement is not considered VA research.
  - f. The R&D Service notifies the “advertiser” of its approval to post or distribute flyers, recruiting documents, or advertisements for non-VA research.
  - g. The R&D Service tracks its approvals of advertisements of non-VHA research.
  
4. VAMHCS restrictions for posting advertisements:
  - a. The only allowable locations are:
    - i. Inside the Research Bulletin Board located in the VAMHCS auditorium hallway on the 2<sup>nd</sup> floor (2B hallway). Contact Tom Bowen at [tom.bowen@va.gov](mailto:tom.bowen@va.gov) or extension 4848.
    - ii. On bulletin boards of clinical areas with the permission of area managers.
    - iii. On table tops of waiting areas with the permission of area managers.
  - b. Advertisements **may NOT** be posted in the following locations:
    - i. On walls of hallways, clinics, bathrooms, stairwells, or other walls, doors, door jambs, etc.,
    - ii. In elevators or on escalators, or
    - iii. On the VAMHCS Facebook page, website or other VAMHCS social media site.