



December 21, 2022

## AdventHealth IRB Position Statement

### RE: Third Party Recruitment Services and Engagement in Research

The IRB reviews study recruitment methods (including advertisements, screening, and payments) to evaluate whether they will affect the equitable selection of participants, and to ensure that the proposed methods adequately protect the rights and welfare of participants.

The protocol/protocol supplement must include a description of the following: (1) the source of subjects for all study groups (intervention/case and control); (2) when, where, how, and by whom these potential subjects will be recruited; (3) the methods employed to identify potential subjects; and (4) the materials used to recruit subjects, including the use of email and text messaging.

If a study plans to utilize third parties in which subjects are recruited by methods such as a call center, those methods should be described in the protocol/protocol supplement documents. This includes considering the Data Sharing section of those documents, when applicable.

Generally, the AdventHealth IRB considers third parties to not be engaged in research per the Department of Health & Human Services (DHHS) rules of engagement in research. At AdventHealth, this means the employees of the third parties contracted to conduct recruitment work would not need to be listed on the AdventHealth Delegation of Authority Logs a.k.a. the Research Personnel Logs. However, it is expected that proper agreements are in place to protect potential participants and the institution. The following should be taken into consideration when engaging third parties:

- Advertising and recruiting procedures must protect potential participants' confidentiality. Names, contact information and other identifying information for potential participants must be collected and maintained in a confidential manner. This includes following research and privacy regulations.
- Principal Investigators and researchers are responsible for ensuring that IRB approved procedures are followed by any third parties (e.g., therapists, teachers, or social-service providers, call centers) who may be aiding in the recruitment and/or advertising process. Payment to professionals in exchange for referral of potential participants ("finder's fees") and payment tied to the rate or timing of enrollment ("bonus payments") is prohibited.
- Collaborating with third party organizations to accelerate recruitment should include:
  - a mechanism to gain an understanding of that organization's mission and training of their employees on research as it relates to their duties and services.
  - a concise plan, on a per study basis, to ensure that the organization's employees are well educated on their duties and services which are auditable.

Thank you.

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