TEXAS A&M UNIVERSITY
SAN ANTONIO

Institutional Review Board

GUIDELINE #16: SOCIAL MEDIA RECRUITMENT

I. PURPOSE

This guideline is to ensure that human subjects' research conducted complies with federal, state and local laws, regulations, directives, and instructions. This guideline provides general guidance for research teams planning to use social media to recruit human subjects for research purposes.

II. STATEMENT

All human subjects research, irrespective of the source of funding, conducted by A&M- SA faculty, staff, and students must be submitted and reviewed in accordance with the Federal research regulations, Texas A&M System Guidelines, A&M-SA IRB policies and local consideration.

III. SCOPE

This guideline applies to all research conducted where the A&M- SA IRB serves as the Reviewing IRB.

IV. SUMMARY

Compliance with Social Media Terms of Use

It is the responsibility of the research team, when designing a protocol, to understand the social media site terms of use (TOU) for all social media sites used as a recruitment method, as well as university policies and applicable laws. In addition, study teams should be aware of any research or recruitment-related restrictions on the social media sites through which they intend to conduct their recruitment activities. This includes a site's advertising, privacy, and prohibited content policies.

After IRB approval, research teams are responsible for amending their protocols as necessary in accordance with any changes to the site's TOU that affect their recruitment plan, and for confirming their compliance with the site's TOU at each continuing IRB review.

Participant Privacy, Confidentiality & Data Security

Private information is described as information about behavior that occurs in a context in which individuals can reasonably expect no observation or recording is taking place, and information provided by an individual for specific purposes that the individual can reasonably expect will not be made public (45 C.F.R. §46.102(f)). If individuals intentionally post or otherwise provide

information on the Internet, such information should be considered public unless existing law and the privacy policies and/or terms of use of the entity/entities receiving or hosting the information indicate that the information should be considered 'private.'

1. In social media platforms, such as X, information is entirely public, as posts can be accessed without having an account or being logged in. Other social media, like Facebook, are a mixture of public and private. Facebook, for example, consists of public pages and private groups, so it is important to include what the privacy settings are in the IRB application.
2. It is the responsibility of the research team, when designing a protocol, to understand the various privacy and data security provisions of social media sites. Research teams must include this information in their social media management plans and provide this information to potential or enrolled participants as appropriate.
3. In social media or other Internet-based research settings, recruitment information can be forwarded or otherwise accessible to other individuals who may not be part of the intended participant pool. Research teams, therefore, must exercise caution to appropriately identify the targeted participant population and to ensure the equitable selection of participants.
4. It is also best practice to de-identify research data collected over social media, even if it is considered a public observation. It is important to consider that direct quotes, images, videos, or more from research subjects obtained through public observation online can allow for re-identification through search engines. Because of this, it is best practice to request permission from the research subject before using direct quotes, imagery, or videos. If that is not feasible, a waiver of consent for minimal risk studies may be appropriate if justifiable.
5. The use of pseudonyms online, sometimes called Avatars or personas, is common practice on some Social Networking Sites (SNS). Personas are considered human subjects and should be treated as such. It is not appropriate to identify the real person behind an online persona.

V. PROCEDURE

Procedures and Considerations for Using Social Media to Recruit Participants

1. Content of Recruitment Materials: The IRB will review the content of social media recruitment materials according to existing IRB guidelines for traditional media recruitment such as flyers and news ads. A&M-SA IRB must approve all the recruitment materials in accordance with federal, state, system, and campus regulations
2. Permissible types of social media recruiting and related considerations:
    - Static recruitment materials include any post or paid advertisement (e.g., Facebook right-column ads) that do not permit liking, commenting, sharing or other public interactions with potential participants on the social media site. Static recruitment

materials that link to an A&M-SA IRB-approved destination do not require a plan for managing interactions on the social media site.

- Interactive recruitment materials include any post or paid advertisement that permits liking, commenting, sharing or other public interactions with potential participants on the social media site. The plan for managing interactive recruitment materials must be clearly delineated in the social media management plan.

- Recruiting via public and private groups is permitted. Research teams must be aware of any site restrictions on recruiting participants via groups. If no site restrictions exist, teams should determine if the group has its own rules or requirements regarding research recruitment. If research recruitment appears acceptable, research teams must identify if there is a group moderator and request permission to communicate with and recruit group members. It is acceptable to take this step prior to requesting IRB approval. As part of the IRB approval process, research teams must submit to the IRB the text of the recruitment materials that will be shared with group members and their protocols should note any previously obtained approval from the group moderator, plans to obtain approval from the group moderator, or absence of a group moderator, as well as what the process will be for responding to messages from group members. It is important to mitigate the risk of misrepresentation of the research team's intent.

- Private messaging for recruitment, defined as two-way communication between a research team member and a potential research subject using private message features on social media sites (e.g., Facebook messages or messenger, Twitter direct messages), may be considered on a case-by-case basis. The IRB will prefer that the potential subject already gave their OK for such communication (for example, a general post was created, and the potential subject gave permission for a private message). This type of contact would be subject to more extensive review. Privacy and other considerations related to such communication must be addressed in the social media management plan submitted to the IRB.

3. How to access social media: Social media recruitment activities must adhere to A&M-SA IRB policies and procedures and must be approved by the A&M-SA IRB.

    - Personal social media accounts. Personal social media accounts cannot be used to purchase or place initial recruitment materials for A&M-SA related studies without A&M-SA IRB approval.

    - Key study personnel must post recruitment materials through A&M-SA IRB approved accounts. Investigators are responsible for all costs associated with paid advertising campaigns.

4. Screening prospective participants and tracking recruitment:

- No screening of prospective participants can occur directly on social media. All screening and data collection must occur offline (e.g., phone) or via a secure platform.

5. IRB Protocol: Investigators must submit a social media management plan as part of their protocol's recruitment plan.
    - A list of all social media sites that will be used for recruiting. The list should include, as applicable:
        - Accounts that will be used for posting recruitment materials or purchasing advertisements, and if needed, documentation of approval from the relevant account manager.
        - Public or private groups that will be used for recruitment, and a description of previously obtained approval from group moderators, plans to obtain approval from group moderators, or absence of group moderators.
    - A statement acknowledging the research team's review of and plans for adhering to the terms of use and advertising, privacy, and prohibited content policies of the social media sites to be used for recruitment.
    - Mock-ups of all planned recruitment materials. This includes static and interactive advertisements, posts, images, banners, tags, predetermined responses to comments, messages to groups, and any other advertising elements. Include a clear explanation of the format and placement anticipated for each advertisement. To facilitate real-time campaign optimization, it is recommended that teams submit several variations of social media advertisements (e.g., alternate images or text) for IRB approval.
    - A description of the site where the link associated with the recruitment materials will lead (e.g., where social media users will be directed online when they click on an advertisement), and a screenshot of the landing page.
    - If applicable, a description of how the research team plans to address privacy, data security, and identity verification considerations for private messaging with potential participants on a social media site.
    - If applicable, a description of any identifiable data to be collected through the social media site during the recruitment process, and how such data will be stored and used.
    - For minimal risk studies, waiver of informed consent can be submitted when using data available in public forums. For example, when a researcher is using a scraping tool to analyze Tweets, it may not be possible to contact all the data subjects. The waiver of informed consent requests must be justified in the IRB application.
    - If the research requires a participant to install an app for data collection on the participant, this is considered human subject research. All approved recruitment materials must display IRB study number and IRB approval date.

- Research that requires a participant to wear or use a piece of smart technology, such as a smart watch, for data collection purposes is considered human subject research.
- Manipulation of the media environment which involves interaction or intervention of the human participant's environment is considered human subject research. An IRB application must be submitted for research involving manipulation of media environment. One well known example of manipulation of the media environment is the 2014 was the Facebook Emotional Manipulation Study, in which Facebook altered users' feeds without consent to reflect either majority negative or positive posts and monitored their subsequent site activity.
- Any deception in SNS studies must receive IRB review and approval.
- A description of which key study personnel will be charged with posting, monitoring and responding to recruitment-related communication on the social media site, as well as any procedures to monitor the activity of those personnel in accordance with the study protocol, SOPs, guidelines and include appropriate monitoring to ensure any posts or comments involving protected health information, or PHI, or pertaining to study participation can be promptly addressed (e.g., study complaints, adverse events). Personnel should also ensure that ads posted through a Facebook account are only displayed on Facebook (i.e., do not select Instagram, Audience Network or other options when placing the ad).Any subsequent changes to IRB approved recruitment materials must be submitted for IRB review and approval prior to use.

VI. REFERENCES

- SACHRP, Considerations and Recommendations Concerning Internet Research and Human Subjects Research Regulations, with Revisions. March 12-13, 2013
- Emory University, Guidelines for Using Social Media to Recruit Research Participants, December 11, 2019.
- University of Pennsylvania IRB, Guidance on Recruitment and Research using Social Media.
- Texas A&M University, SOP: Subjects Selection Recruitment and Payments, May, 1, 2022.
- Social Media Policies – Marketing & Communications | Texas A&M University
- Chapter 3 - Obtaining and Preparing Required Documents for IRB Initial Review
- Guidance Regarding Social Media Tools | National Institutes of Health (NIH)
- https://www.hhs.gov/ohrp/regulations-and-policy/guidance/institutional-issues/institutional-review-board-written-procedures/index.html
- https://vpr.tamu.edu/wp-content/uploads/2024/12/HRP-094-SOP-Subject-Selection-Recruitment-and-Payments-1.pdf

VI. REVISIONS

Guideline: # 16	**Version: V.1**
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