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Use of Email to Communicate with Study Participants Guidance

As the designated REB for research being conducted by and/or under the jurisdiction of the University of Alberta, Alberta Health Services, and Covenant Health, the REB must only approve of processes that adhere to established Institutional guidance and policies related to the use of email when considering requests to communicate with participants in this manner.

Additionally, it is the opinion of the REB that a researcher has a fiduciary obligation to protect the privacy of the research participant and not to create a situation where they may be harmed by a breach of privacy and/or confidentiality.

To support researchers in creating applications that can achieve the above objections, the following guidance is being provided in regards to the use of email to communicate with research participants.

The following policies/procedures form the basis upon which this guidance document is written:

1. AHS' policy/procedure in regards to Emailing Personal Identifiable Health Information
2. The University of Alberta's policy regarding [Email Use and Privacy](#), [Email Phishing](#) and [Privacy and Security Best Practices](#).

The consensus articulated in these policies is that, at this time, email is not generally considered a secure method of communication and as such, sending Personally Identifiable Health Information (as defined under HIA) via email can only be done under very prescribed conditions.

Security of AHS versus UAlberta Email Accounts:

- A. [Sending PHI via AHS email encryption](#):

Email sent outside the AHS network is not secure; when you send an email, it could be intercepted or forwarded to other recipients.

If you are emailing sensitive information to an external address (one that does not end in @albertahealthservices.ca), you must encrypt your email to make sure only your intended recipient can open it.

To encrypt an email, and any attachments to the email, enter !Private in the subject line before pressing send.

Alternatively, you may set the email Sensitivity to Confidential or Private in the email message options/properties.

See the [FAQ section](#) at AHS Insite for more details (you must have a log in for AHS Insite to access this link).

Your recipient will receive an email with a link to register with Trend Micro so that they can decrypt the email. They will only need to register the first time, after that they will be able to log in to decrypt your email. Each time your recipient logs in to their Trend Micro account they will be able to choose to stay logged in for up to seven days.

- B. The University of Alberta's google mail is not considered a secure email. The REB will not approve of any email transmission between researchers and study participants using ualberta.ca email where PHI may be communicated.

The REB may consider the use of email to communicate with participants not using the AHS encrypted email procedure in the following instances:

1) Sending consents via email: Researchers often want to send a consent document via email. It is the opinion of the REB and the Institutional Privacy Advisor that the information contained in a consent form combined with the email address of the recipient (often first and last name) can inadvertently link a diagnosis with an individual. As such, the REB believes this should be considered indirectly identifying health information. It may be permissible, however, to send a consent form via email if it is encrypted (ie. Encrypted .pdf document). The encryption code should be a strong code and it must be sent to the participant separately from the email (ie. Telephone conversation). The encryption of the document needs to persist after the document is opened – (i.e. automatically revert to its encrypted form once closed). The email which contains the encrypted consent document should also contain explicit language that research participant should NOT communicate any questions related to the consent document back to the researchers via email. A script as to the contents of this email should be provided to the REB as part of the application.

2) Appointment confirmation via email/text: It may be acceptable to communicate appointment reminders to participants, if the email reminder contains NO information related to the purpose of the appointment. A script as to the contents of this email should be provided to the REB as part of the application. This script should contain text that reminds the participant NOT to communicate any questions related to the appointment back to the researcher via the email.

Sample text:

This is a reminder of your upcoming appointment, which is scheduled for DATE HERE. Should you have any issues that you wish to discuss in advance of this appointment, please call XXX-XXX-XXXX. *Please do not respond to this email with any personally identifying information or health information related to this appointment as this method of communication may not be secure.*

3) Sending a link to a secure database that holds a consent form: Researchers may be using a system (like REDCAP) which can hold documentation like a consent form, study questionnaires and/or participant documents. The REB would approve of the use of email to inform participants that such documents are available to them, through a link into the secure website. This will be evaluated on a case by case basis and be dependent on the secure system being used.

4) Use of email to recruit potential participants: The REB has been informed that use of email to recruit a participant does not meet the standard outlined in the AHS email policy. As such, the REB is unlikely to approve of any email-based methods of contact with potential participants for recruitment purposes at this time. Scenarios will be considered on a case-by-case basis, ensuring compliance with AHS and University of Alberta policies.

5) Use of email to receive completed study measures by participants back to the researcher: This will be evaluated on a case-by-case basis ensuring compliance with AHS and University of Alberta policies cited herein. Documents will be evaluated to ensure that no directly or indirectly identifying PHI is contained in the documents to be sent via email.

6) Use of MYCHART patient portal: The Alberta Health Services MYCHART patient portal is a secure online health connection. The REB will approve of any participant communication using the MYCHART portal.

Please direct questions related to this Guidance to reoffice@ualberta.ca.