# Harvard Pilgrim Health Care IRB Guidance on E-Mail Communication

## E-Mails to study participants

- \*\*All e-mail messages must be approved by the IRB prior to use\*\*
- Private health information, sensitive information, or information that may breach the participant's confidentiality (e.g. study title, diagnosis, full name, etc) should not be sent via e-mail either in the e-mail text or in the subject line.
- Participants should be notified that they will receive a response within a specific time frame. A telephone number for participants to call should be provided on all e-mail communication.
- Participants should be reminded not use e-mail to communicate urgent messages.

  Depending on the study and the type of e-mail communication, participants should be reminded to contact their primary care provider if they are experiencing any health issues.
- Participants should be reminded that use of e-mail communication is not a secure method of communication unless using encryption.

## When e-mailing participants consider the following risks to subjects

- Multiple people may have access to a single e-mail account. This may include the
  participant's family members and the participant's employer who may have a right to look at
  any messages sent to an office email account.
- E-mail may inadvertently be sent to the wrong address.
- E-mail messages may be edited and/or forwarded to others without the original author's knowledge or permission.
- E-mail responses may not be returned to study participants in a timely manner when study staff are on vacation.
- Messages sent via the internet cannot be considered confidential but must handled as confidential once received by the research project study staff.

## E-mails to colleagues and staff members

- IRB approved study procedures must be followed.
- E-mail messages should only be shared with IRB approved study staff.
- Only use institutional e-mail addresses (gmail, hotmail, etc. should <u>not</u> be used).
- PHI should only be transmitted internally using encryption.
- The e-mail subject line should not include any sensitive information or any information that may breach the participant's confidentiality (e.g. study title, diagnosis, full name, etc).

#### **All E-mail Messages**

If you are sending e-mail to a number of people who do not (or should not) know each other, conceal e-mail addresses by using "bcc" when addressing the e-mail. This feature allows you to enter multiple e-mail addresses without them being visible to the recipients.

## Include a privacy notice in the e-mail

This electronic message and attached files may contain information that is confidential. This information is solely for the use of the individual(s) and entity(s) named as recipients. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or other use of the contents of this electronic message is strictly prohibited. If you have received this electronic message in error, please notify the sender immediately to arrange for return of the document.