

Cornell University
Office of Research Integrity and Assurance
Human Research Participant Protection Program

SOP 13: INFORMED CONSENT, ENROLLMENT, AND OTHER CONSIDERATIONS FOR
RESEARCH INVOLVING NORMAL, HEALTHY PARTICIPANTS

1. Subject of Policy & Procedure

This document sets forth the additional requirements for obtaining IRB approval for research involving normal, healthy participants, as well as special considerations concerning informed consent and enrollment of normal, healthy participants.

There are no federal regulations that specifically address the participation of healthy, normal volunteers in research protocols. However, this class of participants could be considered vulnerable in that (1) they may be unduly influenced by the offer of monetary compensation, (2) they may feel coerced by one-on-one personal recruitment by a person in a position of authority, or (3) they may feel pressured from being approached multiple times for participation in research to serve as members of the control group. In particular, participants who are financially or educationally disadvantaged maybe be unduly influenced to participate in a research study. Confidentiality of data and data security may also be of special concern to this group because they might not otherwise have data on file at an institution. Special precautions should be taken, therefore, to protect their rights and welfare adequately.

This New York State Department of Health report states that “[r]esearch with normal healthy subjects is fundamentally different from research with patient-subjects who may derive personal benefit from the study.” The report defines normal healthy subjects as those “who are free from diseases or medical conditions that might be affected by or have an impact on the research” as distinguished from those who might have a condition or disease that would be ameliorated directly or indirectly by participation or who are excluded because they have a condition or disease that might be affected negatively by participation. For example, a person with a dental bridge might be considered a “normal healthy subject” for a sleep study, but would be excluded from a study that required the placement of an oro-tracheal tube. Because a normal healthy subject does not directly benefit from the study (except for immunization studies and other limited situations), the risk-benefit analysis must focus strongly on the importance of the knowledge to be gained and scrutinize the participant for non-obvious vulnerabilities. *See* Safeguarding Healthy Research Subjects: Protecting Volunteers from Harm, New York State Department of Health, March 1999. pages 2-3, available at <http://www.health.state.ny.us/nysdoh/provider/volunteer/subjectidx.htm>.

2. Scope of Policy & Procedure

This Policy & Procedure applies to all on-going and future human participant research projects conducted by Cornell faculty, staff, or students or by anyone conducting a research activity supported by Cornell or on property maintained by Cornell.

3. Terms and Definitions

All parties to whom this policy applies (*e.g.*, faculty, students, staff, IRB members) should consult the IRB Glossary at <http://www.irb.cornell.edu/glossary/>.

4. See Also

Affected researchers and employees should also consult:

1. Cornell University Federal Wide Assurance Registration:
<http://www.irb.cornell.edu/regulations/fwa.htm>
2. Safeguarding Healthy Research Subjects: Protecting Volunteers from Harm, New York State Department of Health, March 1999:
<http://www.health.state.ny.us/nysdoh/provider/volunteer/subjectidx.htm>.

5. Regulations Applicable to Informed Consent

5.1. The Belmont Report

5.2. 45 CFR 46.109(b), (c), & (e): IRB Review of Research, stating that (1) “[a]n IRB shall require that information given to subjects as part of informed consent is in accordance with §46.116. The IRB may require that information, in addition to that specifically mentioned in §46.116, be given to the subjects when in the IRB's judgment the information would meaningfully add to the protection of the rights and welfare of subjects;” (2) “[a]n IRB shall require documentation of informed consent or may waive documentation in accordance with §46.117;” and (3) “[a]n IRB shall have the authority to observe or have a third party observe the consent process and the research.”

5.3. 45 CFR 46.111(a)(4), (a)(5), & (b): Criteria for IRB approval of research, mandating that (1) informed consent “will be sought from each prospective subject or the subject's legally authorized representative, in accordance with, and to the extent required by §46.116,” and “appropriately documented, in accordance with, and to the extent required by §46.117;” and (2) “[w]hen some or all of the subjects are likely to be vulnerable to coercion or undue influence, such as children, prisoners, pregnant women, mentally disabled persons, or economically or educationally disadvantaged persons, additional safeguards have been included in the study to protect the rights and welfare of these subjects.”

5.4. 45 CFR 46.116: General requirements for informed consent

5.5. 45 CFR 46.117: Documentation of informed consent

6. Requirements for IRB Approval of Research Involving Normal Healthy Volunteers

The Protocol PI should address these requirements in the protocol.

1. The Protocol PI should also define who normal volunteers would be for their particular research project, as well as how he or she will determine their normalcy at the time of evaluation to enroll. The Protocol PI should specify the manner in which normal volunteers will be identified and recruited.
2. In addition, advertisements and scripts must be submitted to and approved by the IRB prior to use. *See SOP 9: Recruitment and Payment of Human Participants.* General announcements or advertisements are favored over one-on-one recruitment efforts.
3. Research involving normal healthy volunteers generally should involve minimal risk and foreseeable risks should be minimized. The Protocol PI must provide justification for involving normal healthy volunteers in protocols involving greater than minimal risk. Where

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risk is greater than minimal, the Protocol PI must ensure that recruitment efforts do not disproportionately target members of healthy but disadvantaged or minority groups (*e.g.*, Native Americans, poor or uneducated persons).

4. The protocol should specify how the Protocol PI will ensure the confidentiality and security of data.
5. The consent process must contain the required elements of consent, including (a) a statement that participation is voluntary and that the participant has the choice of refusing to participate in the research; (b) a specified plan regarding compensation for injury that might result from participation; and (c) an explanation of any known or unknown long term risks from participation.
6. The Protocol PI must address specifically the issue of costs to the participant—there can be no medical costs to the participant. Only costs relating to meals and transportation, or other costs incident to participation approved by the IRB (*e.g.*, child care) are acceptable.

7. Procedures for IRB Review and Approval of Research Involving Vulnerable Populations

- 7.1.** Submitted protocol applications are reviewed in accordance with SOP 3: Initial and Continuing Review by the IRB: Requirements for Submission of Applications, Approval Criteria, and Expedited and Convened Committee Review Procedures.
- 7.2.** As stated previously, because a normal healthy subject generally does not directly benefit from the study, the IRB's risk-benefit analysis must focus strongly on the importance of the knowledge to be gained and scrutinize the participant for non-obvious vulnerabilities.
- 7.3.** The IRB should carefully scrutinize research protocols involving normal, healthy participants which entail greater than minimal risk.
- 7.4.** When IRB-requested changes are returned by the Protocol PI, ORIA will confirm that all the changes have been made and will, as applicable, present them to the Expedited Reviewer for review and approval or place them on the agenda of the next available meeting of the convened IRB.