

Considerations for modernizing the informed consent process

Nichelle Cobb, Association for the Accreditation of Human Research
Protection Programs


Christine Suver, Sage Bionetworks

Objectives

Discuss challenges with informed consent



Illustrate key design principles to enhance readability that were followed to improve an informed consent process for an Alzheimer's Disease Research Center study



Explore barriers to improving informed consent and how research teams and IRBs might overcome the

Informed consent is one of the ways we insure that research ethics are applied in research studies



Photo by Cytonn Photography on Unsplash

Common problems with the informed consent process and forms



Excessive length



Technical language

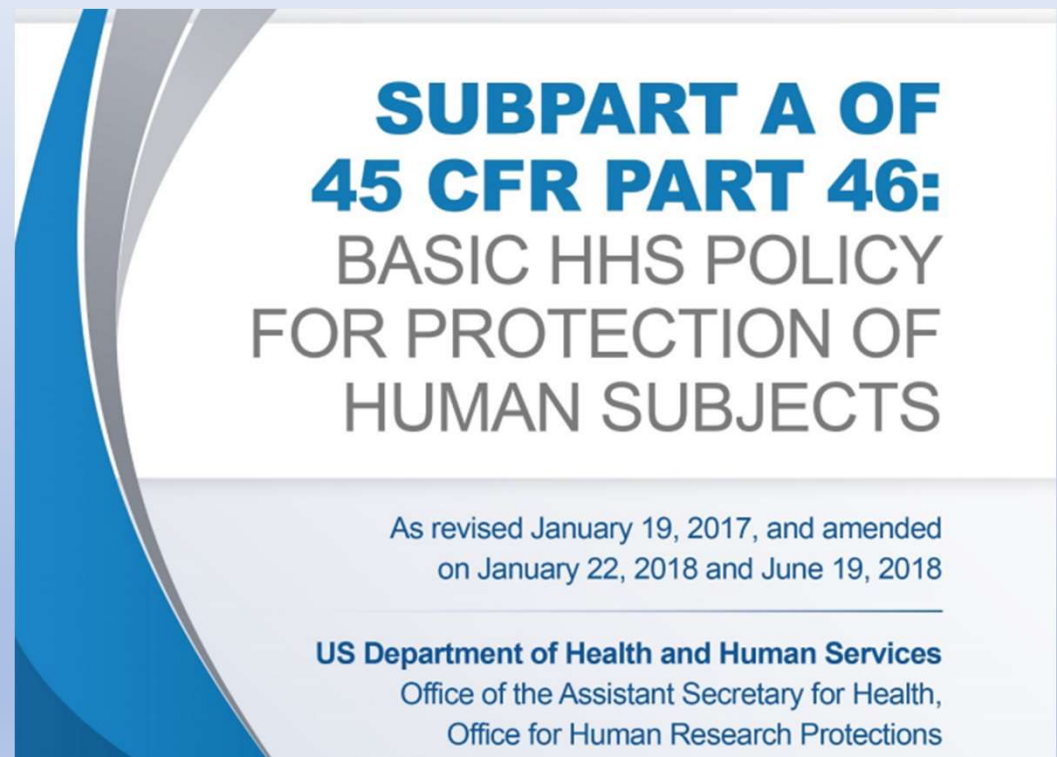


Forms are more of a legal document meant to protect institutions rather than providing information that participants need to decide whether or not to join a study

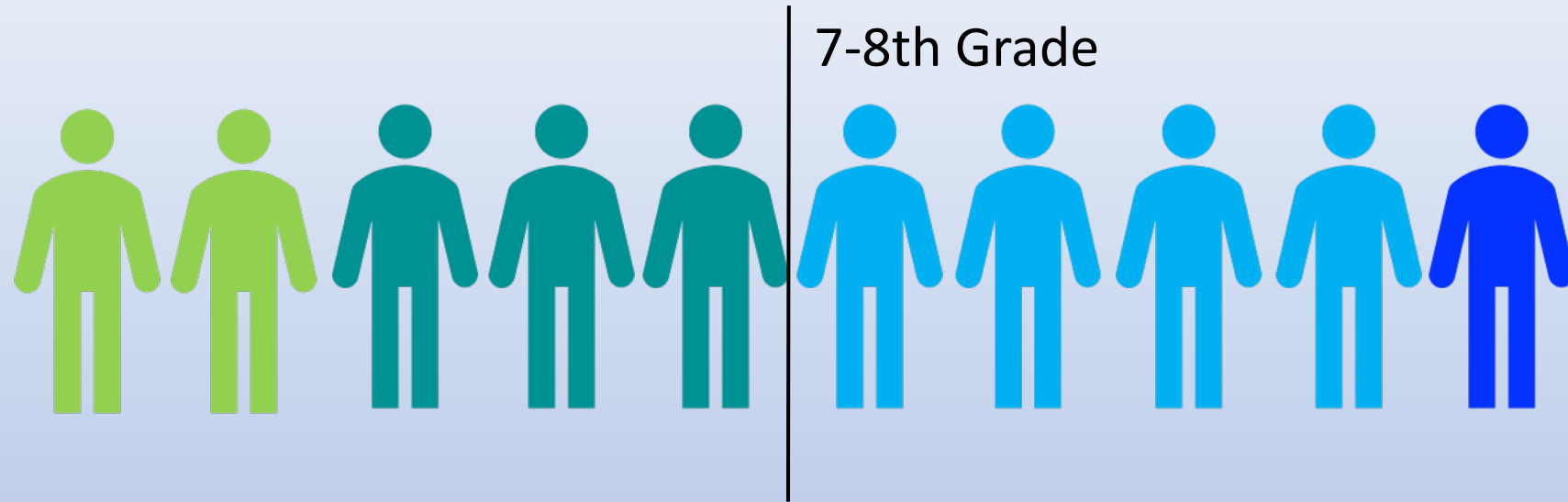


Trying to address the problem: Revised Common Rule requirements

The 2018 version of the Common Rule (and potential the FDA regulations in future) obligates IRBs to ensure the informed process facilitates comprehension and includes information that a reasonable person would want to have in order to make an informed decision about whether to participate



Literacy in the US



1 in 2 American adults reads at a basic or below-basic level

- ~ 18% Below Basic
- ~ 34% Basic
- ~ 36% Proficient
- ~ 12% Highly Proficient

PIAAC: [Program for the International Assessment of Adult Competencies](#) (2012-2017)

[Gallup analysis](#)



E
F P
T O Z
L P E D
P E C F D
E D F C Z P

F E L O P Z D
D E F P O T E C

L E F O D P C T
F D P L T C E O

Improving Comprehension

Components of Literacy and Readability

The reader's proficiency
in the language that
information is
presented in

Number of words and
length of document

Language complexity

Reading ease

How information is
presented

- **§46.116 General Requirements for Informed Consent. (a)(3)**
The information that is given to the subject or the legally authorized representative shall be **in language understandable to the subject or the legally authorized representative.**



- This means:
 - The language someone can speak or read proficiently (e.g., English, Portuguese, Swahili, Esperanto),
 - Reading level, and
 - Ease of reading, comprehension, evaluation, and utilization of information

Informed consent - Language

Choose common words

Avoid jargon

Define technical terms

Short sentences
(no more than 15-20 words)

Keep paragraphs short – 1 idea per paragraph

Avoid using acronyms and abbreviations

Use the same terms consistently

Use active voice
(who is supposed to do what)

Readability Analysis

From the great resource by Meg Doerr, Sage Bionetworks: A Quick Primer on Readability
<http://sagebionetworks.org/wp-content/uploads/2018/11/Primer-on-readability-25April17-1.pdf>

Aim for the lowest reading grade level possible to get the greatest number of people to be able to read it

Flesch-Kincaid 5th grade reading level is readable by ~80% of the US public

Flesch-Kincaid 8th grade reading level is readable by ~50% of the US public

Flesch-Kincaid 12th grade reading level is readable by ~10% of the US public

Aim for a high reading ease

Flesch reading ease of 70.0 and above is a minimum goal. 80.0 and above is better.

Flesch reading ease of 50.0 and below is readable by college students, 30.0 and below by college graduates.

Assessment of Length and Readability of Informed Consent Documents for COVID-19 Vaccine Trials

Ezekiel J. Emanuel, MD, PhD; Connor W. Boyle, BA

- The language complexity in all the documents exceeded a grade 9 reading level, which is higher than the recommended grade 6 reading level
- All the documents had scores of less than 60 in the reading ease metric, with a mean (range) score of 52.4 (49.6-56.8), categorizing them as difficult
- Adults with slower reading ability (175 wpm) would require a mean (range) of 47.6 (44.7-53.4) minutes, if they were able to read without stopping

Table 1. Characteristics of the Phase III COVID-19 Vaccine Randomized Clinical Trial Informed Consent Documents^a

Metric	Pfizer	Johnson & Johnson	Moderna	AstraZeneca	Mean	Proposed alternative
Length, pages, No.	25	25	20	17	21.8	10
Document reading time, min						
175 wpm (lower bound)	44.7	47.7	53.4	44.7	47.6	16.9
240 wpm (mean)	32.6	34.8	38.9	32.6	34.7	12.3
300 wpm (upper bound)	26.1	27.8	31.1	26.1	27.8	9.9
Word count, No.						
Whole document	7828	8341	9340	7821	8333	2960
Risk section	884	989	1445	977	1074	200
Privacy section	2478	1955	1280	1750	1866	778
Reading grade level						
Whole document	9.8	8.8	9.6	11.3	9.9	7.6
Risks section	9.5	8.5	9.4	11.2	9.7	6.1
Privacy section	11.7	10.7	11.5	13.1	11.8	9.6
Reading ease ^b						
Whole document	52.2	56.8	51.1	49.6	52.4	61.8
Risks section	58.8	56.8	54.8	46.9	54.3	71.2
Privacy section	39.8	48.7	40.3	41.0	42.5	53.8

Abbreviation: wpm, words per minute.

^a Range, 0 to 100, with 100 indicating easiest to read and scores less than 60 considered difficult by the Department of Health and Human Services.

JAMA Network Open. 2021;4(4):e2110843. doi:10.1001/jamanetworkopen.2021.10843

April 28, 2021 2/5

Readability is important, but what else do we need to do to make informed consent better?

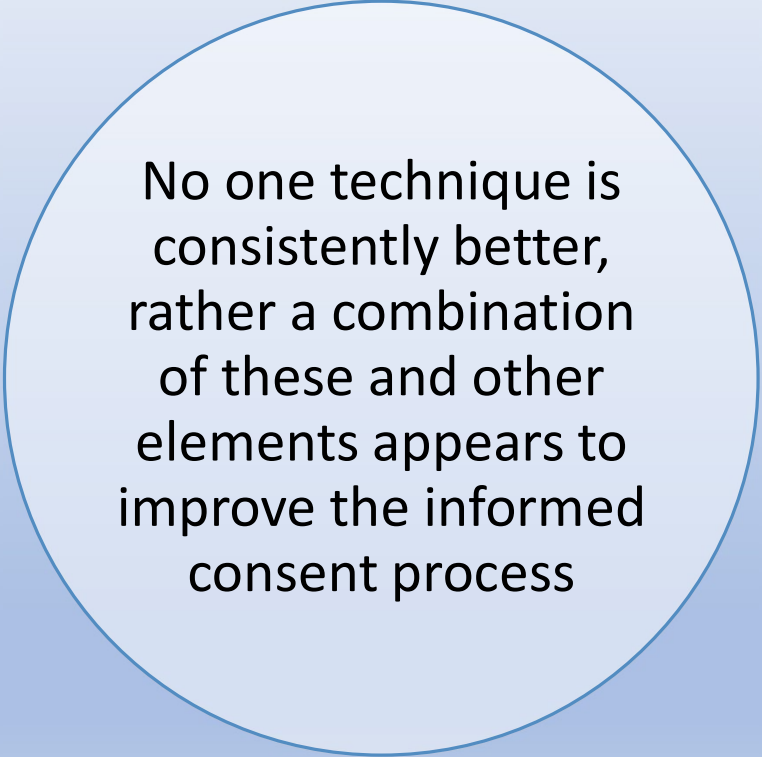


What else promotes informed consent?

Knowledge check with
corrected feedback

Interpersonal relationships
with study teams

Electronic format



No one technique is consistently better, rather a combination of these and other elements appears to improve the informed consent process

References:

- Flory & Emmanuel 2004
- Nishimura et al 2013

Informed consent - Formatting

Font size at least
12 point or
larger

Be mindful of
fonts used?

Use white space
(margin sizes at
least 1 inch)

Use headings

Avoid dense text

Bullet points

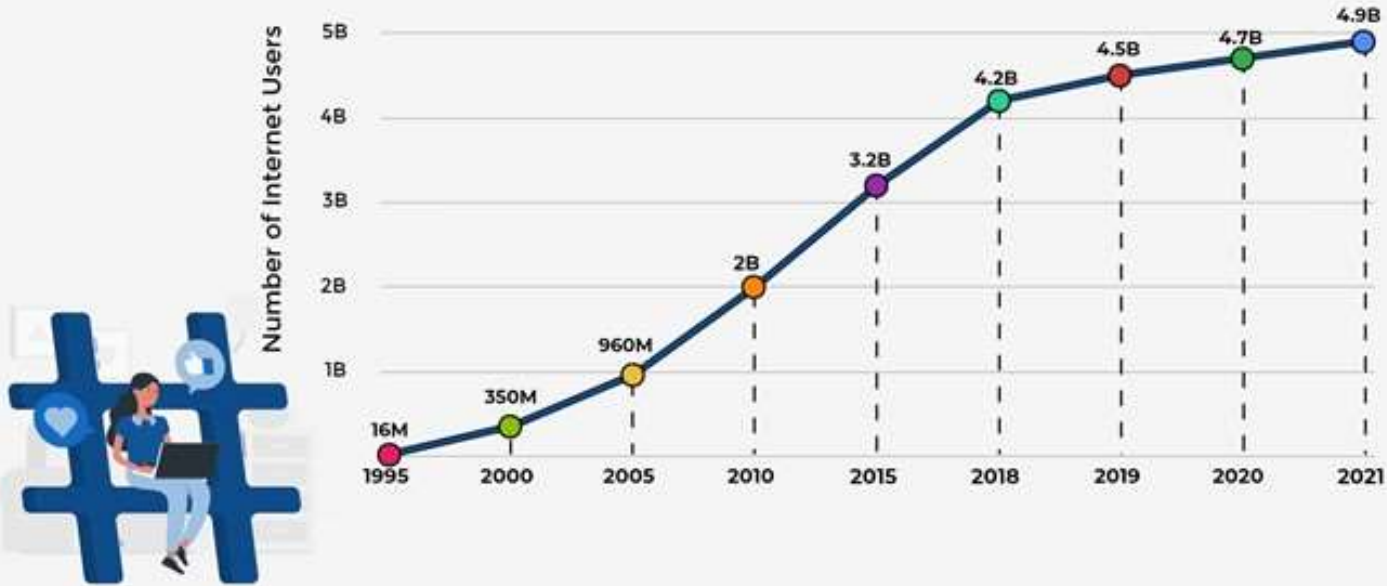
Incorporate
graphics and
other visual aids

<https://consenttools.org/optimizing-key-information/>



Why Format Matters

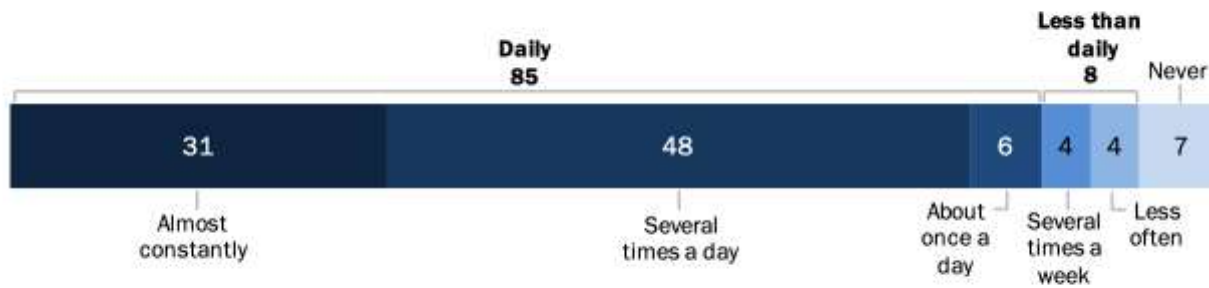
Number of Internet Users Around the World



<https://www.broadbandsearch.net/blog/how-people-use-the-internet#post-navigation-0>

More than eight-in-ten U.S. adults go online at least daily

% of U.S. adults who say they go online ...

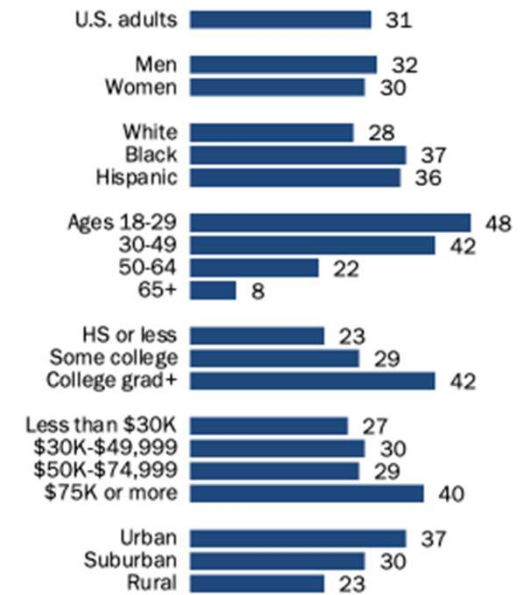


Note: Respondents who did not give an answer are not shown.
Source: Survey of U.S. adults conducted Jan. 25-Feb. 8, 2021.

PEW RESEARCH CENTER

About three-in-ten Americans go online 'almost constantly,' but this varies greatly by age

% of U.S. adults in each group who say they go online "almost constantly"



Note: White and Black adults include those who report being only one race and are not Hispanic. Hispanics are of any race. Respondents who did not give an answer or who gave other responses are not shown.

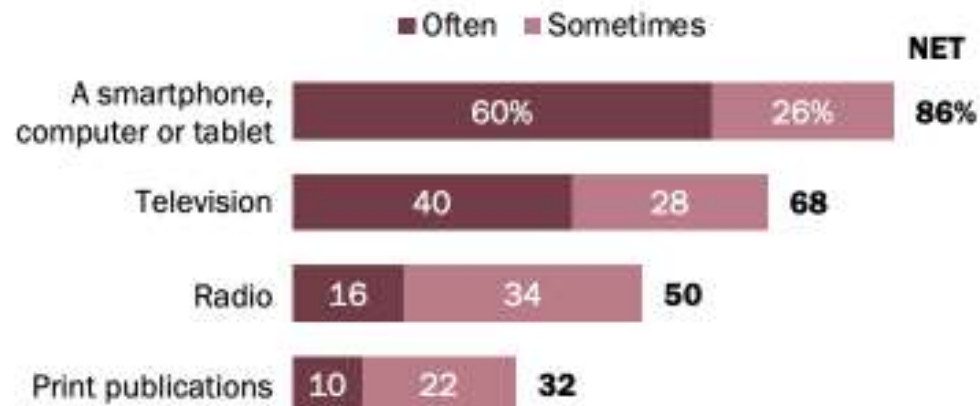
Source: Survey conducted Jan. 25-Feb. 8, 2021.

PEW RESEARCH CENTER

<https://www.pewresearch.org/fact-tank/2021/03/26/about-three-in-ten-u-s-adults-say-they-are-almost-constantly-online/>

Large majority of Americans get news on digital devices

% of U.S. adults who get news ____ from ...

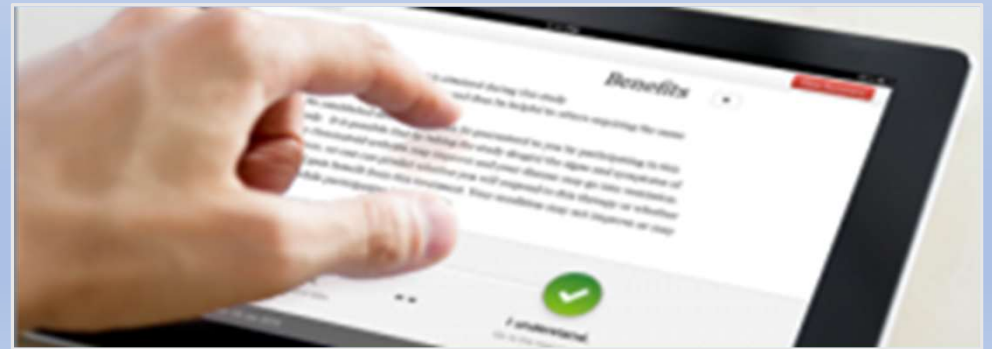


Source: Survey of U.S. adults conducted Aug. 31-Sept. 7, 2020.

PEW RESEARCH CENTER

<https://www.pewresearch.org/fact-tank/2021/01/12/more-than-eight-in-ten-americans-get-news-from-digital-devices/>

Reimagining the informed consent process



Different ways to structure an eConsent

ECoWeB Information Pages

The following information sheet has been created to tell you all about the ECoWeB trial. If you still have questions after reading it then do get it touch, our contact details are at the end of the document. There is also a box to tick to indicate you have read the information.

Assessing and Enhancing Emotional Competence for Well-Being (ECoWeB) in the Young: Version 0.9 Dated 10.09.2020

What is ECoWeB about? This project seeks to increase insight into how emotions work and the skills of spotting, understanding, and managing emotions in young people. We are asking young people to take part in the study to find out what influences mood, how emotions change over time, and which emotional skills increase well-being.

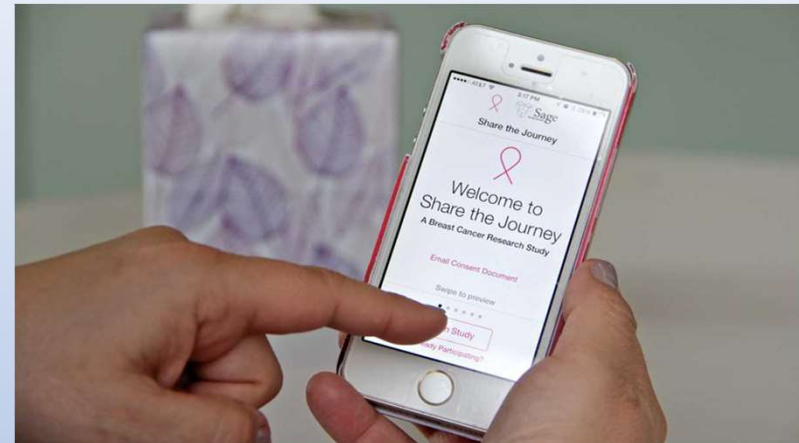
What will I have to do? We ask you to complete questions about emotions, emotional skills and well-being 4 times on our website. These questions will be asked at the start of the study and then at follow-ups after 1 month, 3 months, and 12 months. We also ask you to use a Smart-phone health app for at least several weeks to monitor your emotions in daily life. We will offer some people self-help strategies and workouts within the app to improve their Emotional Fitness and well-being. This is so we can learn what approaches best improve well-being in young people. who gets which version of the app will be decided by chance.

I confirm I have read the information sheet



Different ways to structure an eConsent

Better



Tapping

Videos

Main concept → DNA Analysis

Text information area → Researchers may want to study your DNA. Please watch this short video to proceed.

Video (with closed captioning) →

Link to video transcript → View Transcript

Contact information → Need Help? 1-844-842-2855 help@joinafocus.org Chat Live OPEN

sagebionetworks.org/in-the-news/elements-informed-consent/

mPower Progression Study
Consent and Authorization Contents

I understand:

- I will use the mPower app to answer questions and do short physical and cognitive activities. The app will help me track my symptoms, triggers, and medications.
- My study data will be encrypted and transferred from my phone. It will be stored on Sage Bionetworks' secure cloud-based database.
- My data will be used for research as described in the study information (<https://parkinsonmpower.org/consent>).
- I have the option to share my coded study data for future research. It is up to me. I can say yes or no.
- The main risk of participating in the mPower Progression Study is to my privacy and

Icons

Developing an Interactive eConsent Process for Two Alzheimer's Disease Research Centers

Example of an interactive consent tool two Alzheimer's Disease Research Center study teams developed with Sage Bionetworks



Dorothy Farrar-Edwards

Hannah Blazel
Erin Chin
Nichelle Cobb
Ken Croes
Carey Gleason
Sanjay Asthana



Jim Lah

Cecelia Manzanares
Felicia Goldstein
Allan Levey



Christine Suver
Brian Bot
Allie Seroussi
Woody McDuffy
Stockard Simon
Amy Tran
Jennifer Hamann
Meg Doerr
John Wilbanks
Lara Mangravite

**ADRC Study
coordinators,
Research
Participants
and partners**









Alzheimer's Disease research

Longitudinal
– Partners - Researchers

invasive procedures

Patients

2018
2019
2020
2021
2022
2023
2024
2025

-  Questionnaires on health & lifestyle
30-60 minutes
-  Memory and thinking tests
1 to 2 hours
-  Brain image scan (MRI)
2 hours
-  Physical exam & neurological exam
30-60 minutes
-  Blood and other samples
30 minutes
-  Lumbar puncture
2 hours



No symptoms → Mild Cognitive Impairment (MCI) → Alzheimer's Disease

Project goals

Create a participant-centered process that:

- **Builds trust**
- **Facilitates comprehension of the research**
- **Adapts to a population with memory deficit**
- **Supplement the interaction with the study coordinator/team**
- **Enhances the discussion with the study coordinator/team**



Stakeholder engagement

Study participants, partners, study coordinators, researchers, designers and IRB

- Barriers and facilitators of consent to AD research
- Integrate the revised Common Rule requirements
- Re-assess information / language
- Test early eConsent designs



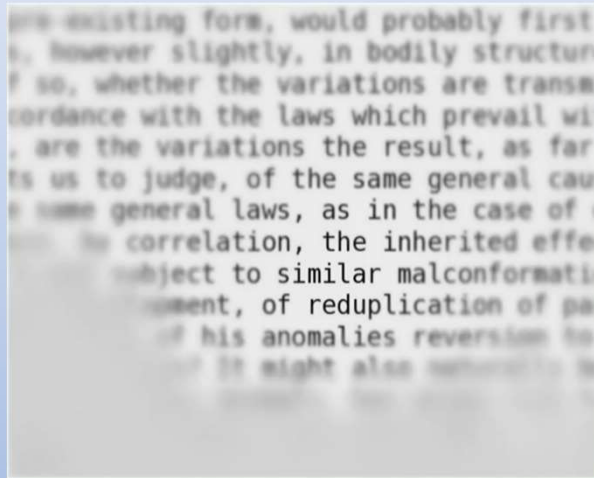
REFLECT → ITERATE → REFINE
REPEAT

* Suver et al (2020) :10.1080/23294515.2020.1737982

Design principles

Design with intent to slow down,
provoke thought, and learn

Ethical Design Considerations



The biggest lie on the internet: "I have read and understood the terms of service"

On July 7, two US academics published a paper entitled "The Biggest Lie on the Internet: "Ignoring the privacy policies and terms of service policies of social networking services" which details an experiment they carried out on 543 students, asking them to open



INTERACTIVE



**IMPROVE
COMPREHENSION**



LINKS TO EXPLORE



SELF ASSESSMENTS



EASY TO UPDATE



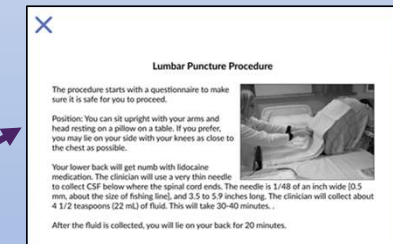
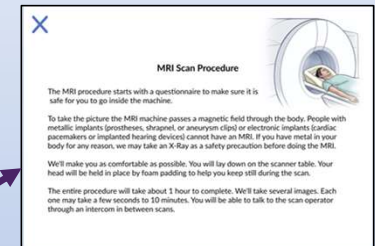
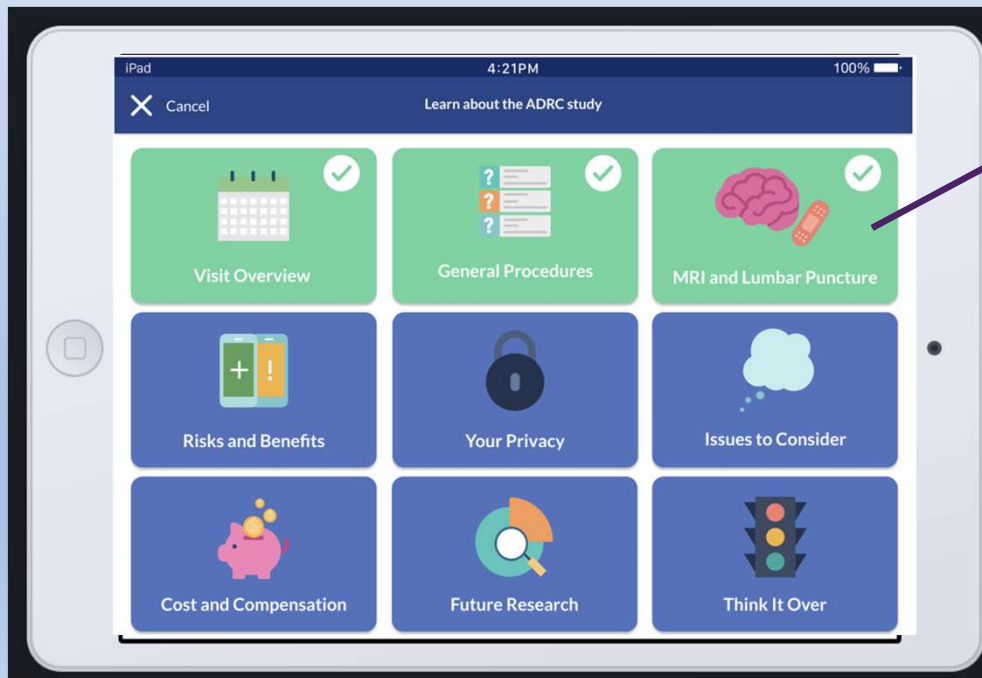
LESS PRESSURE



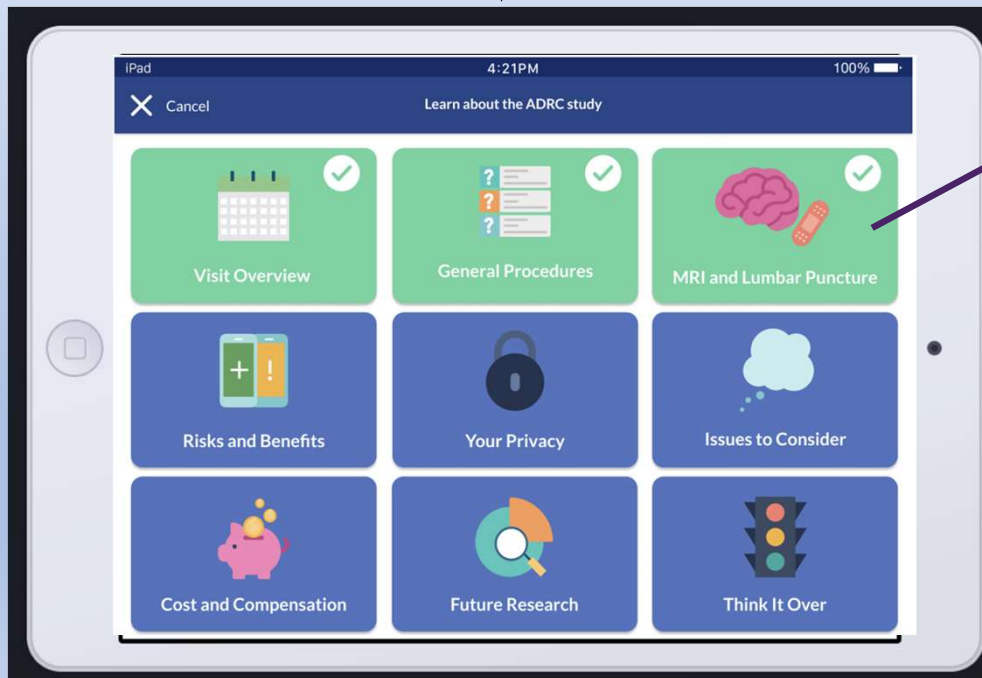
MORE CONTROL

eConsent Narrative - Self-guided exploration

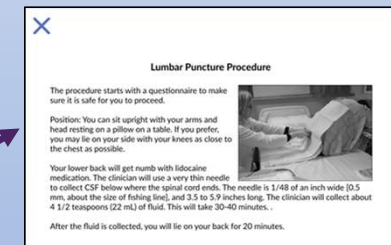
Modules are presented after the concise and focused summary screens



The tool was developed to display on a tablet and sections of the informed consent were divided into modules that allowed participants to access information in their preferred order

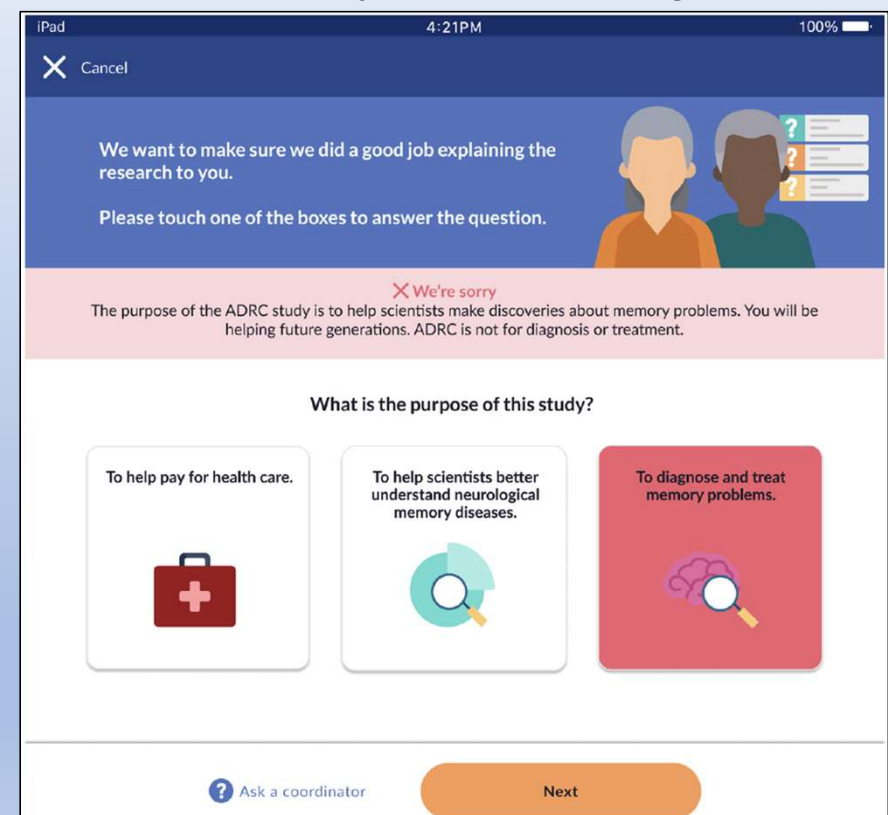
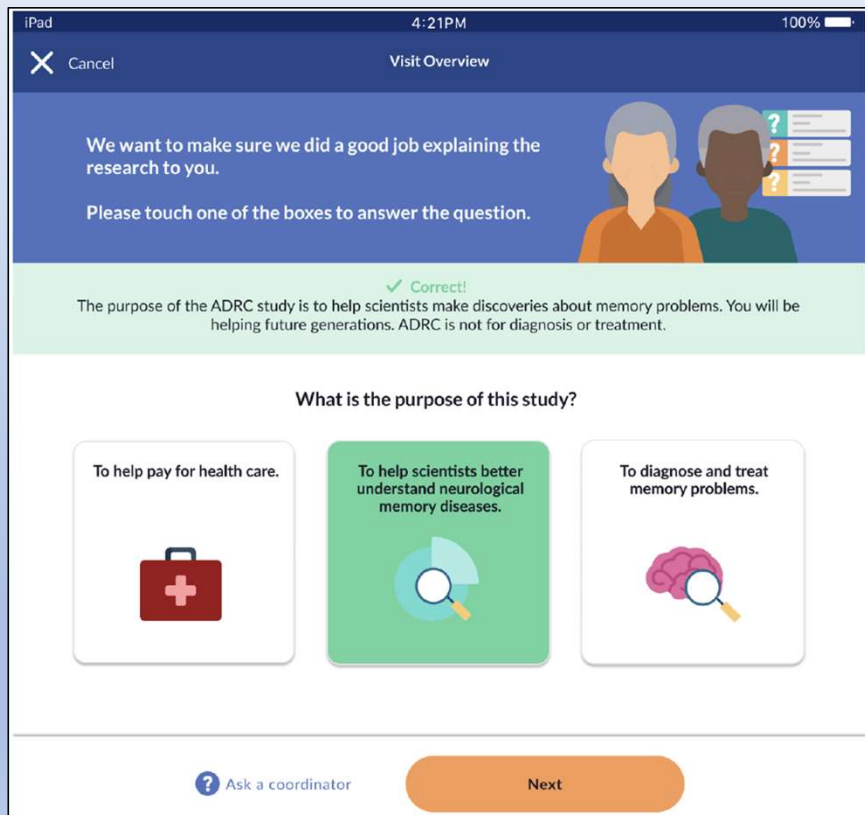


Each section included pictures and icons plus pop up windows that provided additional information if desired



Including a knowledge check

Key questions were presented at the end of each module to check participants' understanding and provide feedback to them. Coordinators could follow up on areas that suggested an incomplete understanding

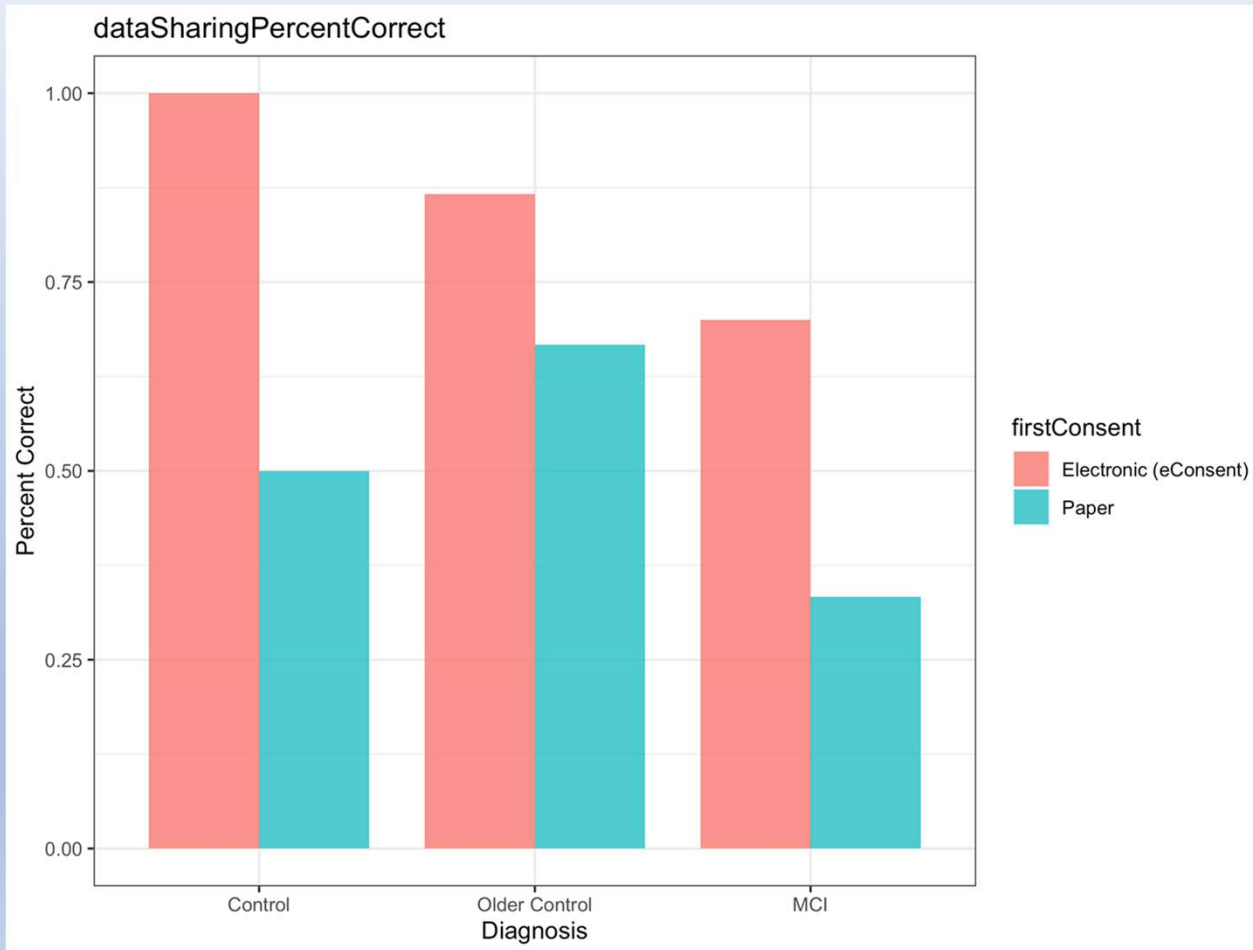


Does eConsent Work?

Comprehension questions

- Visit Overview: What is the purpose of this study?
- General Procedures: What general procedure is not part of this study?
- MRI and Lumbar Puncture: Which statement is true?
- Risks and benefits: Are there risks to participating in the ADRC study?
- Risks and benefits: Are there risks of having a brain scan (MRI)?
- Privacy: How will my privacy be protected?
- Results: What results will I get?
- Costs and Compensation: Will I receive a bill for study procedures?
- Future Research: How long will your samples be stored?
- Think it Over: Do I have to take part in the research study?

Comprehension – 1 of 10 questions

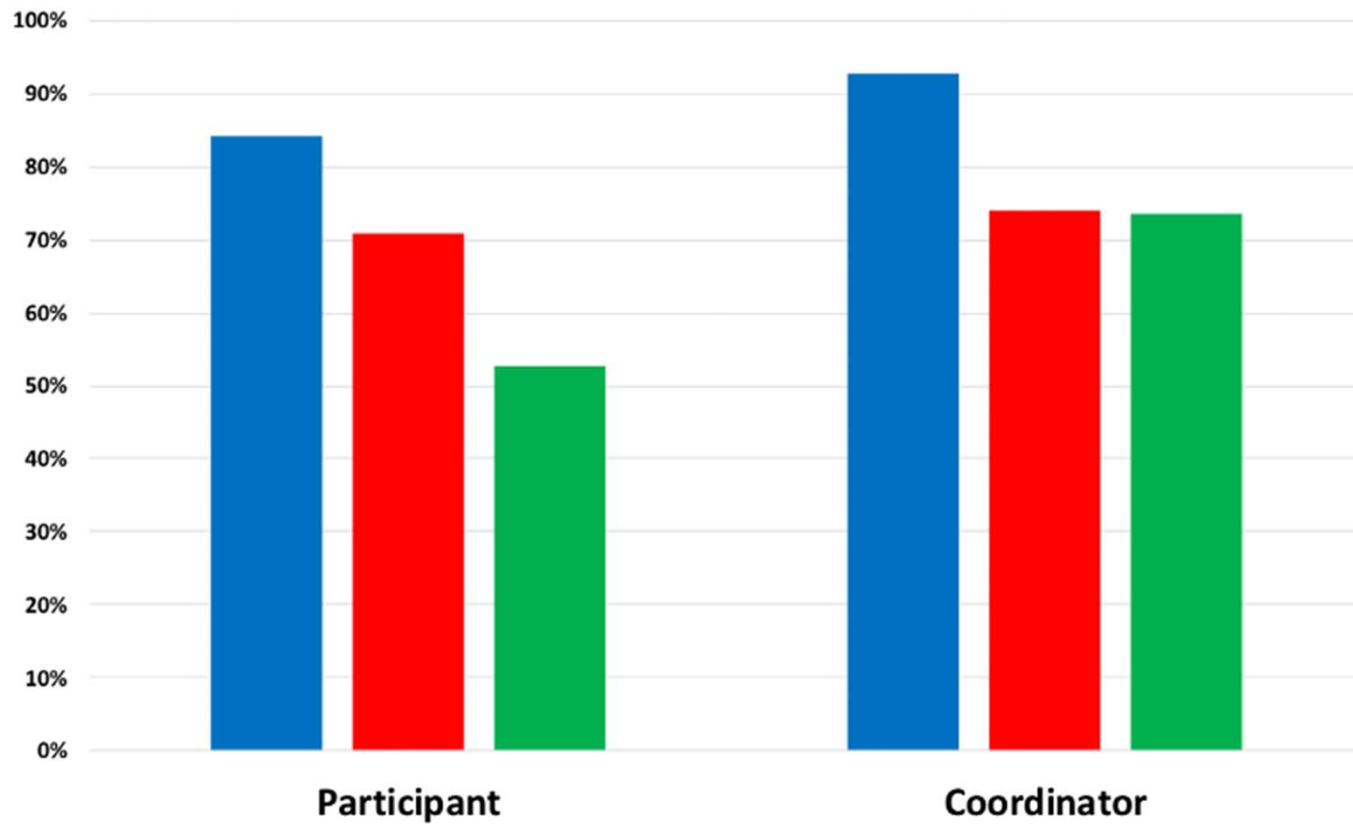


Which one of the following best describes who will have access to your study samples and data?

- ... any researcher who asks for them
- ... no one outside the study team
- ... my personal physician only
- ... qualified researchers outside our institution for other research studies

Preference for eConsent

■ ≤65 ■ >65 ■ MCI



Why participants like the eConsent

I prefer reading to listening

move through more swiftly with enhanced understanding

I could go at my own speed and concentrate on the issue that I was reading

I was able to set my own pace

Colorful, kept my attention better

Controls

MCI

Easier to read

Better, included reviews

People who prefer the paper format

Controls

MCI

Person to person is more comfortable

I believe I will try the electronic once I become familiar with the format

I am used to paper

I am old school and need to learn technology. Eventually for environmental purposes I would choose the electronic version.

I trust paper more than electronics. I can refer to it more readily

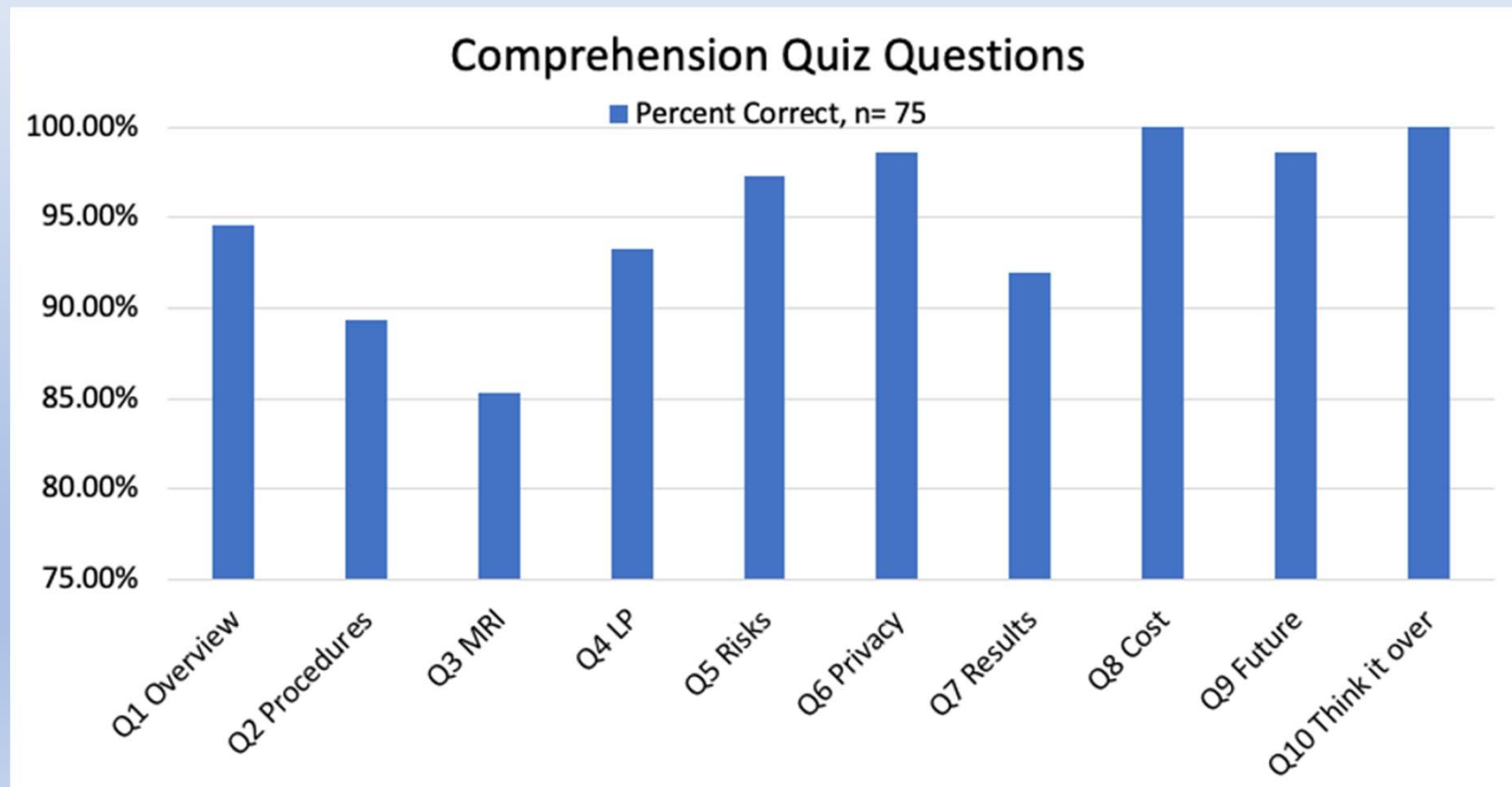
I can go back to a line and reread it. Touching the screen is a little bit of an effort for me.

Implementation in



- Study participants received a unique code sent via email directly from REDCap to complete the eConsent.
- Participants could choose to complete the eConsent on their own or be guided through the eConsent with a study coordinator.
- Study coordinators were able to view the completed eConsent and score the quiz questions.
- Study coordinators were asked to review all incorrect quiz questions with the study participant.

The 10 quiz questions were answered correctly by most participants from both centers





If we know what improves
informed consent, why are
we not applying best
practices?

Source Documents

Sponsors (industry and federal) often do not provide template documents that meet readability standards



eConsent

The possibilities that an electronic format have to offer are not always leveraged

When used, the electronic informed consent document rarely differs from a paper presentation of the information



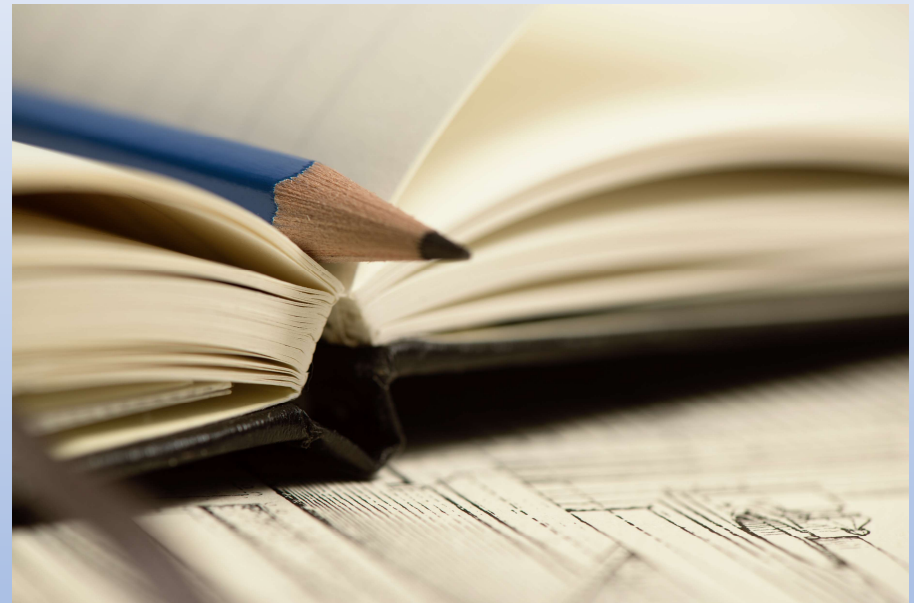
Expertise



Informed consent documents for investigator-initiated research are often not developed by individuals with expertise in literacy (especially health literacy)



Training on how to conduct an informed consent process is often not emphasized at organizations



Time and resources

IRBs often do not have the bandwidth to edit to the degree needed to significantly improve readability nor do organizations have experts available to help create robust consent forms

Templates help but have their limits



What are some
of the solutions
for wider
adoption of
best practices?



Selected resources

- PRISM Readability Program (Toolkit + Online Training)
 - <https://www.kpWASHINGTONresearch.org/about-us/capabilities/research-communications/prism>
- MRCT: HEALTH LITERACY IN CLINICAL RESEARCH
 - <https://mrctcenter.org/health-literacy/>
- NIH: Plain Language: Getting Started or Brushing Up
 - <https://www.nih.gov/institutes-nih/nih-office-director/office-communications-public-liaison/clear-communication/plain-language/plain-language-getting-started-or-brushing>
- The AHRQ Informed Consent and Authorization Toolkit for Minimal Risk Research
 - <https://www.ahrq.gov/funding/policies/informedconsent/index.html>
- Washington University in St. Louis: Consent Tools for Clinical Research Professionals
 - <https://consenttools.org/>
- Sage Bionetworks: Elements of Informed Consent Toolkit
 - https://sagebionetworks.org/tools_resources/elements-of-informed-consent/
- Global Alliance for Genomics and Health: Regulatory & Ethics Toolkit
 - <https://www.ga4gh.org/genomic-data-toolkit/regulatory-ethics-toolkit/>
- Vanderbilt: Using REDCap for eConsent:
 - https://victr.vumc.org/econsent_basics/

**Implementation, Policy and
Community Engagement
Special Communication**

Cite this article: Cobb NL, Edwards DF, Chin EM, Lah JJ, Goldstein FC, Manzanares CM, and Suver CM. From paper to screen: regulatory and operational considerations for modernizing the informed consent process. *Journal of Clinical and Translational Science* 6: e71, 1–8. doi: [10.1017/cts.2022.379](https://doi.org/10.1017/cts.2022.379)

Received: 11 November 2021
Revised: 16 March 2022
Accepted: 19 March 2022


Keywords:

Informed consent; eConsent; IRB; ethical oversight; regulation; Common Rule

Author for correspondence:

C.M. Suver, PhD, Sage Bionetworks, 2901 Third Ave, Suite 330, Seattle, WA 98121, USA. Email: christine.suver@sagebase.org

From paper to screen: regulatory and operational considerations for modernizing the informed consent process

Nichelle L. Cobb¹, Dorothy F. Edwards², Erin M. Chin², James J. Lah³, Felicia C. Goldstein³, Cecilia M. Manzanares³ and Christine M. Suver⁴ 

¹Association for the Accreditation of Human Research Protection Programs, Inc. (AAHRPP), Washington, DC, USA; ²University of Wisconsin-Madison School of Medicine and Public Health, Wisconsin Alzheimer's Disease Research Center, Madison, WI, USA; ³Emory University, Goizueta Alzheimer's Disease Research Center, Atlanta, GA, USA and ⁴Sage Bionetworks, Seattle, WA, USA

Abstract

Electronic platforms provide an opportunity to improve the informed consent (IC) process by permitting elements shown to increase research participant understanding and satisfaction, such as graphics, self-pacing, meaningful engagement, and access to additional information on demand. However, including these elements can pose operational and regulatory challenges for study teams and institutional review boards (IRBs) responsible for the ethical conduct and oversight of research. We examined the experience of two study teams at Alzheimer's Disease Research Centers who chose to move from a paper-based IC process to an electronic informed consent (eIC) process to highlight some of these complexities and explore how IRBs and study teams can navigate them. Here, we identify the key regulations that should be considered when developing and using an eIC process as well as some of the operational considerations eIC presents related to IRB review and how they can be addressed.

Thank you!



Contact us!

- Nichelle Cobb,
ncobb@aahrpp.org
- Christine Suver,
christine.suver@sagebase.org