

Section 5. Informed Consent

This section provides information on informed consent procedures for MTN 002. MTN 002 involves one informed consent for screening and enrollment.

All potential study participants must provide written informed consent before protocol-specified procedures for determining eligibility for study participation are completed. Participants who are found to be eligible for the study will undergo protocol-specified “on study” procedures as outlined in the protocol.

For MTN 002, there is one study informed consent form entitled "Phase I Study of the Maternal Single-Dose Pharmacokinetics and Placental Transfer of Tenofovir 1% Vaginal Gel among Healthy Term Gravidas." This consent form will be administered before any study procedures are performed.

In most cases, enrollment into MTN 002 will not occur the same day that the study informed consent is signed due to the need to wait for screening lab results that are required to confirm study eligibility. Once all pending screening lab results are received, and the study participant is confirmed to be eligible, she can then be enrolled.

This section contains general information and instructions applicable to required informed consent procedures for MTN 002.

5.1 Overview of Informed Consent Requirements and Procedures

Informed consent is a process by which an individual voluntarily expresses her willingness to participate in research, after having been informed of all aspects of the research that are relevant to her decision. Informed consent is rooted in the ethical principle of respect for persons. It is not merely a form or a signature, but a process, involving information exchange, comprehension, voluntariness, and documentation. Each of these aspects of the process is described in greater detail below. Please also refer to Section 4.8 of the ICH GCP guideline and the informed consent section of the DAIDS SOP for Source Documentation for further guidance on the informed consent process and documentation requirements.

US regulations (45 CFR 46) specify the elements of informed consent must be conveyed to research participants through the informed consent process. It is the responsibility of the Investigator of Record (IoR) to ensure that all potential study participants receive the required information during the informed consent process before any study procedures are completed; The IoR may delegate this responsibility to other study staff.

Because of the reviews that are completed as part of the MTN protocol development and study activation processes, there is adequate assurance that once a site has been “activated” for study implementation, the site-specific informed consent form specifies all information required by the regulations. However, responsibility for informed consent does not end with preparation of an adequate informed consent form. It also is the responsibility of the IoR and designated study staff to:

- Deliver all required information in a manner that is understandable to potential study participants
- Assure that informed consent is obtained in a setting free of coercion and undue influence
- Confirm that the participant comprehends the information

- Document the process

If the participant is not literate, an impartial literate witness must be present during the entire informed consent process/discussion with the participant. As part of the documentation steps detailed below, the witness will be asked to sign and date the informed consent form to attest that the information in the consent form was accurately explained to, and apparently understood by, the participant, and that informed consent was freely given by the participant. The ICH GCP guideline identifies an “impartial” witness as a person who is independent of the study, who cannot be unfairly influenced by people involved with the study. The MTN CORE received guidance from the US Food and Drug Administration’s GCP office stating that the witness need not be “totally unaffiliated with the study. It may be possible, for example, to designate a "subject advocate" who would be available at the site ...” Please refer to Section Appendix 5-1 for a summary of considerations for obtaining informed consent from illiterate participants.

When a witness is present during the informed consent process, care should be taken to minimize the perception of coercion due to the presence of the witness. For example, the purpose of having the witness present should be clearly explained to the participant, with emphasis on the fact that the witness is there as a protection for the participant, not as an agent of the study per se.

As a condition for study activation, the study site must establish an SOP for obtaining informed consent from potential study participants that ensures that all of the above-listed requirements are met. The SOP must be consistent with the DAIDS SOP for Source Documentation. It is recommended that the SOP contain the elements listed below and that the site seek IRB/EC review and approval of the SOP.

- The minimum legal age to provide independent informed consent for research at the study site
- Procedures for ascertaining participant identity and age
- Procedures for ascertaining participant literacy
- Procedures for providing all information required for informed consent to the participant
- Procedures for ascertaining participant comprehension of the required information
- Procedures to ensure that informed consent is obtained in a setting free of coercion and undue influence
- Procedures for documenting the informed consent process
- Considerations and requirements for illiterate participants, including specification of who may serve as a witness to the informed consent process
- Storage locations for blank informed consent forms
- Storage locations for completed informed consent forms
- Procedures for implementing a change in the version of the informed consent form used
- Staff responsibilities for all of the above (direct and supervisory)
- Staff training requirements (if not specified elsewhere)
- QC/QA procedures related to the above (if not specified elsewhere)

5.2 Informed Consent for Screening and Enrollment

The informed consent process for screening and enrollment will be conducted according to site SOPs. Informed consent must be obtained prior to performing any study procedures. For participants who do not provide consent, no procedures (screening or enrollment, or follow up procedures) should be performed and no data that can be linked to the participant's name or other personal identifier(s) should be recorded.

5.2.1 Informed Consent Support Materials

Site-specific informed consent forms: The informed consent forms used at the site must be reviewed and approved by the site's IRBs/EC and DAIDS prior to their use. After the forms are approved, the site is responsible for preparing supplies of their approved forms and for only using the currently approved versions of the forms at all times during the study.

5.2.2 Comprehension Assessment

The staff person conducting the enrollment informed consent process with a potential participant is responsible for determining whether the participant comprehends the information provided to her.

Study staff may want to ask some questions that indicate if the participant understands salient points of the protocol. If the participant does not mention one or more of the salient points, study staff should follow-up with another open-ended question to elicit a response about that point.


When responding to the various questions, potential participants may report back more information than is necessary. This is acceptable, as long as the required information is reported back. If any misinformation is reported back, study staff may explain the correct information.

It is expected that study staff assessing informed consent comprehension will be sufficiently knowledgeable about MTN 002 to make good judgments about potential participants' understanding of the study and help participants grasp protocol information. It is possible that a participant might repeat the correct information, yet the staff member may not be convinced that she really understands it. In these cases the staff should decide if further explanation or discussion is needed before proceeding to the final informed consent discussion and signing or marking of the informed consent form. The further explanation or discussion could take place at the same visit or another visit might be suggested/scheduled.


Whenever additional information or explanation is needed, all the informed consent support materials may be used. Study staff should decide which materials may be most helpful to each participant. Some potential participants may be more comfortable interacting with the same study staff person throughout the informed consent process. However, another staff member may be consulted, if necessary or desired, to help explain problematic concepts and/or respond to participant questions or concerns.

Figure 5-1
Overview of MTN 002 Enrollment Informed Consent Process

Briefly **describe the steps** in the consent process and tell the woman the how long it takes to complete.


 Does she has time to complete this today?

- If yes, proceed.
- If no, schedule return appointment.

 Is she ready to have the **informed consent form** read to her or read it herself?

- If yes, proceed.
- If not, determine what she needs and provide information or schedule return appointment.

Read consent form, section by section, asking if she has questions and discussing as you go along.

 Does she feel comfortable that she understands all aspects of the study?

- If yes, proceed.
- If not, determine what she needs and provide more information at that time or schedule return appointment.
- If participant demonstrates comprehension of all required topics, proceed
- If not discuss misunderstandings and probe problem areas with open-ended questions.
- If participant is fatigued or requests more time, or if study staff judge that participant needs more time, schedule return apt and repeat steps in the process as needed.

Complete all name, signature, and date blocks on the enrollment informed consent form. Offer participant a copy of the form. Document the process per site and DAIDS SOPs.

- Proceed with screening and enrollment procedures (per protocol and this manual).

5.3 Documenting the Informed Consent Process

US regulations require that informed consent be documented by "the use of a written informed consent form approved by the IRB/EC and signed and dated by the subject or the subject's legally authorized representative at the time of consent."

To fulfill this requirement, complete all signature and date blocks on the informed consent form in ink. Legal names should be used. Fabricated/falsified names should not be used. Initials may not be used in place of a participant's full surname, and it is strongly recommended that initials not be used in place of a participant's full first name. However, if a participant commonly signs her name using an initial for her first name, the initial may be used, provided this practice is acceptable per the policies of the study site institution(s).

If the participant is not literate, the witness who was present during the informed consent discussion must sign and date the informed consent form to attest that the information in the consent form and any other written information was accurately explained to, and apparently understood by, the participant, and that informed consent was freely given by the participant. The participant's printed name, signature, and signature date blocks on the informed consent form should be completed as follows:

- The study staff member who completes the informed consent process/discussion with the participant should enter the participant's name below the "participant's printed name" block, together with a signed and dated note documenting the name of the person who made the entry and the date of the entry.
- The participant should make her mark in the "participant's signature" block.
- The study staff member who completes the informed consent process/discussion with the participant should enter the date upon which the participant made her mark on the informed consent form below the "participant signature date" block, together with a signed and dated note documenting the name of the person who made the entry and the date of the entry.

The DAIDS SOP for Source Documentation lists detailed requirements and suggestions for documenting the informed consent process. All requirements listed in the DAIDS SOP must be met. In order to also meet some of the suggestions listed in the DAIDS SOP, site staff may use an informed consent "coversheet" similar to the example included in Appendix 5-2. If the site chooses to use a coversheet, the coversheet should be listed as a source document in their SOPs for Source Documentation for MTN 002 and should use the coversheet consistently to document all informed consent processes with all participants.

In addition to completing the documentation requirements on the informed consent form itself, each informed consent process must be documented in a signed and dated chart note. It is essential that the note (as well as the dates on the informed consent form itself) documents that informed consent was obtained prior to the initiation of any study procedures. The note should also document adherence to the requirements of the informed consent section of the DAIDS SOP for Source Documentation. However, if an informed consent coversheet is used, it is not necessary to transcribe information recorded on the coversheet into the chart note.

Finally, regulations require that participants be given a signed copy of the informed consent forms. If a participant opts not to receive a copy, document this in a chart note and offer the participant an alternate form of study contact information (e.g., a contact card or appointment card) in lieu of the full informed consent form.

Section Appendix 5-1 Summary of Considerations for Obtaining Informed Consent from Illiterate Persons

- The site must specify procedures for obtaining and documenting informed consent from illiterate persons in its SOP for obtaining informed consent. These procedures must be consistent with the DAIDS SOP for Source Documentation and must be followed each time informed consent is obtained. It is recommended that the site seek IRB/EC review and approval of these procedures.
- An impartial witness must be present during the entire informed consent discussion with an illiterate participant. The witness must sign and date the informed consent form to attest that the information in the consent form was accurately explained to, and apparently understood by, the participant, and that informed consent was freely given by the participant.
- The site SOP for obtaining informed consent should define who may serve as the witness to the informed consent process.
- Take care to minimize the perception of coercion due to the presence of the witness.
- The study staff member who completes the informed consent process/discussion with the participant should enter the participant's name below the "participant's printed name" block, together with a signed and dated note documenting the name of the person who made the entry and the date of the entry.
- The participant should make her mark in the "participant's signature" block.
- The study staff member who completes the informed consent process/discussion with the participant should enter the date upon which the participant made her mark on the informed consent form below the "participant signature date" block, together with a signed and dated note documenting the name of the person who made the entry and the date of the entry.
- Refer to Section 4.8 of the ICH GCP guideline and the informed consent section of the DAIDS SOP for Source Documentation for additional information.

Section Appendix 5-2
Sample Informed Consent Coversheet for MTN 002

Participant Name (or PTID):	
Name of study staff person completing informed consent process/discussion (and this coversheet):	
Is the participant of legal age to provide independent informed consent for research?	<input type="checkbox"/> Yes <input type="checkbox"/> No ⇒ STOP. Participant is not eligible for MTN 002.
Date of informed consent process/discussion:	
Start time of informed consent process/discussion:	
Language of informed consent process/discussion:	
Was the informed consent process/discussion conducted according to site SOPs for MTN 002?	<input type="checkbox"/> Yes <input type="checkbox"/> No ⇒ Record and explain departures from site SOPs below.
Can the participant read?	<input type="checkbox"/> Yes <input type="checkbox"/> No ⇒ A literate impartial witness should be present during the entire informed consent process/discussion. Refer to site and DAIDS SOPs for specific instructions. Record name of witness here: <p style="text-align: center;">Record relationship of witness to participant here:</p>
Version number/date of informed consent form used during informed consent process/discussion:	
Was all information required for the participant to make an informed decision provided in a language that was understandable to the participant?	<input type="checkbox"/> Yes <input type="checkbox"/> No ⇒ Explain below.
Were all participant questions answered?	<input type="checkbox"/> Yes <input type="checkbox"/> No ⇒ Explain below.
Was the participant given adequate time/opportunity to consider all options before making her informed decision?	<input type="checkbox"/> Yes <input type="checkbox"/> No ⇒ Explain below.
Did the participant accept a copy of the informed consent form?	<input type="checkbox"/> NA (participant chose not to provide informed consent) <input type="checkbox"/> Yes <input type="checkbox"/> No ⇒ Offer alternative form of study contact information to participant.
End time of informed consent process/discussion:	
Notes/Comments (continue on back if needed):	
Signature of study staff person completing informed consent process/discussion (and this coversheet):	