

Human Subjects Office of Research UNIVERSITY OF GEORGIA

# IRB Review on the Recruitment Process and Materials

Maricia Dilan, IRB Professional

mdilan@uga.edu

# What is recruitment in research?

- The process of asking an individual to take part in the research
- Generally the first contact between researchers and prospective participants. This includes answering research questions from potential participants.
- A prelude to the informed consent process



#### What does the IRB need to review in the recruitment process & materials?

• When, where, and how participants will be initially contacted



Talking to people about the research (Face-to-Face Interaction)



Calling or emailing, USPS



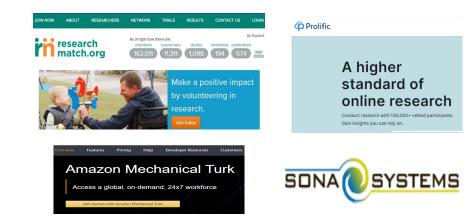
Posting or handing out flyers



Social Media Ads



TV, radio, newspaper, or billboard ads



Other online participants pool platforms

## **Advertisement does not:**

- State or imply a certainty of favorable outcome or other benefits beyond what is outlined in the consent document and the protocol
- Promise "free treatment," when the intent is only to say subjects will not be charged for taking part in the research
- Emphasize the payment or the amount to be paid, by such means as larger or bold type or symbols
- Include exculpatory language



#### What should be in the recruitment materials/advertisement?

Recruitment materials should be limited to the information prospective

subjects need to determine their eligibility and interests, to wit:

- 1. Name of the principal investigator (PI), his/her affiliation, and contact information; the name of primary contact (if not the PI)
- 2. Word "research"
- 3. Condition under study or purpose of the research
- 4. Summary of the criteria to determine eligibility for the study
- 5. A brief list of participation benefits, if any
- 6. A description of any reasonably foreseeable risks, if any
- 7. Time or other commitment required of the subjects
- 8. Location of the research and the person or office to contact for further information



For Amazon MTurk or similar participant panels with text/character limitations for posting:

- The word "research"
- Summary of the criteria that will be used to determine eligibility for the study
- Condition under study or the purpose of the research
- Time or other commitment required of the subjects
- Amount of compensation that will be provided

For Student Pools (SONA) where standard pool format is required:

- The word "research"
- Summary of the criteria that will be used to determine eligibility for the study
- Condition under study or the purpose of the research
- Time or other commitment required of the subjects



# For FDA-Regulated research, the advertisement DOES NOT:

- Make claims, either explicitly or implicitly, that the drug, biologic or device is safe or effective for the purposes under investigation
- Make claims, either explicitly or implicitly, that the test article is known to be equivalent or superior to any other drug, biologic or device
- Use terms, such as "new treatment," "new medication" or "new drug" without explaining that the test article is investigational
- Include a coupon good for a discount on the purchase price of the product once it has been approved for marketing.



## What is SONA Systems?

#### **SONA Systems**

- A research participant pool used by several UGA Departments
- An online management system that makes creating surveys and signing up for research participation much easier for students, and allow researchers to manage appointments in real time





## How the SONA Systems work?

- 1. Participants have accounts in this system, and they use it to view studies and sign-up for the studies they would like.
- 2. Each study posts a brief description of it (SONA recruitment ad).
- 3. Sona allows PI to show studies only to people who have completed a screener and indicate qualifying (e.g,. being a woman would see the study description and time slots).
- 4. PI post available time slots, participants take them, and provided with research credit when they show up.
- 5. Research data is completely separated from participant's data (e.g., online studies), unless PI collects it during the lab visit.
- 6. This system reduces the risk of coercion or undue influence or the appearance thereof.

**NOTE:** No-show will not result in penalty or deducting credit to previously earned credits.



## **External Site vs. Engaged**

- External Site organization where participants will be recruited
  - Examples:
    - Teacher will forward recruitment email to students
    - Hospital Clerk will hand out flyers to patients
  - Letter of Support from the external site may be required
- Engaged does the recruiting and consenting
  - Examples:
    - Teacher/Hospital Clerk will answer questions about the research aside from forwarding the recruitment email/handing out flyers.
    - Providing the consent form and answering questions
  - Non-UGA team member own IRB Approval is required; or if no IRB, Individual Investigator Agreement may be considered Human Subi



#### Special considerations when recruiting children

- 1. Children vs. Minors in Research not all "minors" meet the federal criteria for being "children" as defined in 45 CFR 46.402.
  - Some states permit some minors to consent to research. E.g. California
  - Legal Age/Majority Age
    - 18 most states including Georgia
    - 19 Alabama and Nebraska
    - 21 Mississippi
- 2. Wards (45 CFR 46.409) wards of the state or any other agency, institution, or entity can be included in research only if such research is:
  - (1) Related to their status as wards; or
  - (2) Conducted in schools, camps, hospitals, institutions, or similar settings in which the majority of children involved as subjects are not wards.
- **3**. Pregnancy Testing for Minor Girls
  - If MRI, fMRI, MRS, similar procedures and drugs will be used in research

#### Special considerations when recruiting children (cont.)

- 4. Minors in long-term studies
  - Minor during enrollment but reach the age of majority while study procedure or follow-up are still ongoing
- 5. Educational Setting –
- Family Educational Rights and Privacy Act (FERPA)

- is a Federal law that protects the privacy of student education records

<u>National Student Lunch Act (NSLA)</u>

– is the federal policy governing free lunch service to students in K12 settings. It protects the data (who gets free or reduced-price lunches). As such, specific parent (or student if they are over 18) consent is required to use/access the data

#### For Recruitment purposes

- If the data are used to identify a population, clearly, they have not given their consent yet. Thus, this recruitment process is not NSLA compliant

#### Special considerations when recruiting children (cont.)

- <u>Protection of Pupil Rights Amendment (PPRA)</u> is a federal law that provides certain rights for parents of students regarding, among other things, student participation in surveys; the inspection of instructional material; certain physical exams; and the collection, disclosure, and use of personal information for marketing purposes.
  - <u>Opt-out consent process</u> a letter is sent to parents that serves as the recruitment and consent form. This will only be returned with parent's signature if they want their child to opt-out for research
    - Waiver/Alteration of Consent required
  - Some schools prefer <u>opt-in consent process</u> consent form is required
- 6. Parent/s participation requirement
  - Studies where parents are also participants if parent/s allowed their child to participate but not themselves, will the child be excluded?

### **Recruitment section in the protocol**

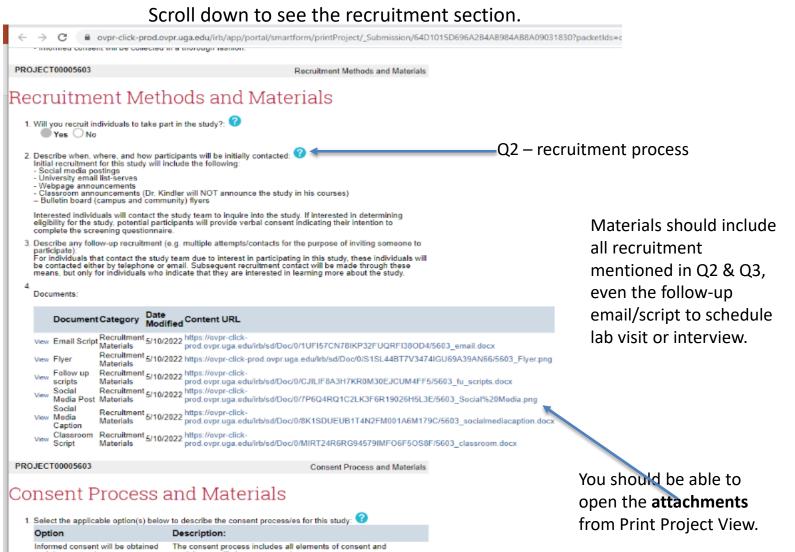
From the study workspace, you may see the entire study in PDF by clicking **PRINT PROJECT**.

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Page for Staci Belcher > HR-pC			🗡 Admin View 🔞 He
Project Editor	Hin-pQCT Performance Study	ID: PROJECT00005603	
Print Project	Principal Investigator: Kindler	Contacts: Beicher	
View Differences	Reviewer: Dilan	Review Level:	
	Funding Source: No results found.	Approved Date:	
Activities	Committee: IRB 2	Expiration Date:	
Activities	Review Category:	Project Status: Deferred	
Submit Changes			
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Add Internal Comment	Draft	Colores -	Date Modified
Add Additional Readers	Excludable Medical Conditions	Category Consent Form	5/6/2022 11:03 AM
Submission PDF	Screening form	Consent Form	5/5/2022 3:34 PM
	Consent form	Consent Form	5/11/2022 9:20 AM
Take Snapshot	Demographics questionnaire	Materials for Data Collection	5/5/2022 3:40 PM
	Health History Questionnaire	Materials for Data Collection	5/5/2022 3:40 PM
	Anthropometrics form	Materials for Data Collection	5/5/2022 3:46 PM
	Scan protocol	Oner	5/10/2022 7:55 PM
	Scan protocol HRpQCT	Other	5/11/2022 11:38 AM
	Email Script	Recruitment Maurials	5/10/2022 2:43 PM
	Flyer	Recruitment Materials	5/10/2022 2:44 PM
	Follow up scripts	Recruitment Materials	5/10/2022 2:43 PM
	Social Media Post	Recruitment Materials	5/10/2022 2:44 PM
	Social Media Caption	Recruitment Materials	5/10/2022 2:44 PM
	Classroom Script	Recruitment Materials	5/10/2022 2:44 PM

To see the reviewer's comments, click **VIEW PROJECT (top link) or VIEW DIFFERENCES**. Note: Only the admins have the **EDIT PROJECT** link.

#### **Recruitment section in the protocol (cont.)**

#### **PRINT PROJECT View (PDF Version)**



and documented participants will sign a consent document. You will be required to attach consent documentation on question #4 below before submitting

# **Helpful Links/Resources:**

- 092 <u>Participant Selection and Recruitment</u>
- 095 <u>Students as Research Participants</u>
  - 096 Family Educational Rights and Privacy Act (FERPA) and Use of Education Records
- UGA Research Participant (RP) Pool Information
- <u>Use of Penalties for Students Who Fail to Show up: Letter to SONA SYSTEMS, (January 8, 2010)</u>
- <u>Children in Research (berkeley.edu)</u>
- <u>FERPA (https://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html)</u>
- <u>PPRA (https://studentprivacy.ed.gov/faq/what-protection-pupil-rights-amendment-ppra)</u>
- <u>NSLA (https://www.georgiaencyclopedia.org/exhibition/food-power-and-politics-the-story-of-school-lunch/</u>)

# Thank you!

