From:

To: Goldkind, Sara

Subject: RE: Re-consent

Date: Tuesday, March 18, 2014 2:47:36 P

From: Goldkind, Sara

Sent: Tuesday, March 18, 2014 2:15 PM

To: [redacted]

Subject: RE: Re-consent

[redacted]

There is a consensus that the term informed consent should not be viewed as synonymous with obtaining a subject's signature on the consent form. Rather, obtaining a subject's signature on the consent form should be only a part of an informed consent process. Generally, the informed consent process begins with subject recruitment and continues after the consent form is signed. Depending on the clinical trial, additional information may need to be given to the subject, and the subject may need additional opportunities to ask questions and receive answers throughout the clinical investigation.

That said, there isn't any consensus on how often clinical trial subjects should be "re-consented," if at all, in the absence of any important change in the science.

For studies enrolling children, there may be an ethical imperative to consent the individuals once they've reached the age of majority (This, of course, would not be considered "re-consenting" them.)

Hope this helps. If not, please feel free to call me to discuss further.

Sara

Sara F. Goldkind, MD, MA Senior Bioethicist, Office of Good Clinical Practice Office of the Commissioner, Food and Drug Administration

Tel: 301-796-8342; Fax: 301-847-8640 Email: Sara.Goldkind@fda hhs.gov

This communication does not constitute a written advisory opinion under 21 CFR 10.85, but rather is an informal communication under 21 CFR 10.85(k) which represents the best judgment of the employee providing it. This information does not necessarily represent the formal position of FDA, and does not bind or otherwise obligate or commit the agency to the views expressed.

From: [redacted]

Sent: Monday, March 17, 2014 2:53 PM

To: Goldkind, Sara **Subject:** Re-consent

Sara,

Is there a consensus, or anything near a consensus, among ethicists regarding how often clinical trial subjects should be re-consented, in the absence of any important change in the science?

Thanks, [redacted]