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New NIH Requirements for Human Subject Proposal Preparation!

NIH has announced significant changes to the requirements for preparing a proposal/application that involves human subjects research. Effective January 25, 2018, the new NIH Forms-E form set, which specifically targets human subjects and new clinical trial requirements, will be required for all proposal submissions. It is important that you become familiar with the new definition of a NIH Clinical Trial and the new form set.

In summary,

1. The NIH has expanded the definition of what it considers a clinical trial. This expanded definition could now include more behavioral studies.
2. Program Announcements will now indicate in the title “Clinical Trial Required”, “Clinical Trial Not Allowed” and “Clinical Trial Optional”. NIH Institutes are implementing this requirement differently so it is important to both determine if a program announcement accepts clinical trials and the specific requirements of that institute.
3. There will now be specific review criteria for clinical trials that will be included in the relevant program announcements.
4. Extensive administrative requirements for clinical trials, including training of study staff and CT.gov reporting, are now required.
5. Forms-E includes a significantly re-designed human subject section with discrete form fields that will need to be completed.
6. There is a Single IRB requirement for all domestic sites that will be conducting the same protocol. The sIRB plan will need to be included in the application.

It is highly recommended, if you plan to submit a NIH Clinical Trial proposal, that you review the guidance appended to this memo and take the time to review and understand the new Forms-E section, “PHS Human Subjects and Clinical Trials Information”. This section is located on pages 11-16 in the Annotated Forms-E Form Set and will increase the time an Investigator or Clinical Coordinator will spend completing an application.

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Appendix

Upcoming Changes to NIH proposal submissions from NIH effective 1/25/18

New Definition of a Clinical Trial

A research study in which one or more human subjects are prospectively assigned to one or more interventions (which may include placebo or other control) to evaluate the effects of those interventions on health-related biomedical or behavioral outcomes. https://grants.nih.gov/policy/clinical-trials/definition.htm

How is this different? The new definition has caused debate about the distinction between observational and interventional studies and may now expand to include more behavioral studies.

Why does this matter? NIH has announced extensive administrative requirements for all clinical trials, including mandatory training for trial staff and registration and results reporting within clinicaltrials.gov. There may be significant penalties for non-compliance.

How do I know if I am submitting a clinical trial? NIH will classify your proposal as a clinical trial if you answer "Yes" to these 4 questions, which are listed on page 12 under "*Section 1 - Basic Information"* in the annotated Forms-E form set:

1. Does your study involve human participants?
2. Are the participants prospectively assigned to an intervention?
3. Is the study designed to evaluate the effect of the intervention on the participants?
4. Is the effect that will be evaluated a health-related biomedical or behavior outcome?

Continuing to Clarify the NIH Definition of a Clinical Trial -
https://nexus.od.nih.gov/all/2017/09/08/continuing-to-clarify-the-nih-definition-of-a-clinical-trial/

FAQs – NIH Clinical Trial - https://grants.nih.gov/grants/policy/faq_clinical_trial_definition.htm

Decision Tree for NIH Clinical Trial Definition - https://grants.nih.gov/policy/clinical-trials/CT-decision-tree.pdf

Additional Clinical Trial-specific Review Criteria and Designated Parent Announcements

Beginning on 1/25/18, clinical trials will no longer be submitted to the same parent announcement as other investigator-initiated proposals. There will be specific clinical trial parent announcements for R01s and R21s. The Parent R01 Clinical Trial Required Announcement has been posted and can be found here. Notice that the announcement specifically states "Clinical Trial Required"; we anticipate that there will be a separate Parent R01 Announcement that will be designated "Clinical Trial Not Allowed".

It is also important to note that each NIH Institute has the authority to choose to accept the Clinical Trial Parent Announcement and for what type of trials. Please review the participating Institutes and Centers information found here to see what restrictions each Institute and Center has put forth.

Collecting Human Subjects and Clinical Trial Information Using the New Designated Forms-E Form

The main update to the form set is the introduction of the PHS Human Subjects and Clinical Trials Information Form (pages 11-16). This form consolidates all human subjects information, including inclusion enrollment report(s) and clinical trial information, into one area. In addition, information will now be collected at the study level using discrete form fields, including study population characteristics, enrollment tables, protection and monitoring plans and protocol information.

Investigators are responsible for determining if their proposed research involves human subjects. NIH has put together a resource to assist Investigators with this determination which can be found at the NIH Infopath. On the InfoPath website, under the tab labeled, *"Are you Conducting Human Subjects Research?"*, you will find assistance in how to prepare the new forms and guidance on the 3 exemptions that are most widely used.

When studies that involve human specimens or data are not classified as human subjects research, Investigators will now be responsible for providing a justification uploaded to the form set.

Annotated Form Set -
https://grants.nih.gov/grants/ElectronicReceipt/files/Annotated_Forms_General_FORMS-E.pdf

Youtube video on preparing the new form -
https://www.youtube.com/watch?v=nz9NWFhYOG8&list=PLOEUwSnjvqBJeHcb4yai7_fDnFZFPEmQK&index=1

Single IRB Requirement

Starting 1/25/18, NIH expects all sites participating in multi-site studies which involve non-exempt human subjects research funded by the NIH to use a single Institutional Review Board (sIRB). This policy applies to the domestic sites of NIH-funded multi-site studies where each site will conduct the same protocol; it does not apply to career, research training or fellowship awards. Applicants are expected to include a plan for the use of a sIRB in the grant application submitted to the NIH. This information will be uploaded as part of the PHS Human Subjects and Clinical Trial Information in the new Forms-E form set.

The Partners IRB and Research Management have provided a policy guide and budget estimator tool that will assist Investigators and departments in preparing their sIRB plan and the costs associated with it. -
https://partnershealthcare.sharepoint.com/sites/phrmApply/aieipa/irb/Pages/Single-IRB-(sIRB)-Review.aspx

Single IRB Policy for Multi-site Research and the Corresponding Notices and Statements -
https://grants.nih.gov/policy/clinical-trials/single-irb-policy-multi-site-research.htm