# Guidance for Reviewers: Review of Clinical Trial Applications (October 2018 Council) Reviews

## Summary

NIH has launched initiatives in 2017-2018 to enhance the accountability and transparency of clinical research, by targeting key points along the clinical trial lifecycle from concept to results reporting. The key changes relevant to application review include the following, each of which requires applicants to understand the NIH definition of a clinical trial:

- Clinical trial specific funding opportunity announcements
- A new PHS Human Subject and Clinical Trial Information form that is part of the FORMS-E application package
- Clinical trial specific review criteria.

We recognize that we are all still learning. To help ensure a smooth transition, we are asking reviewers to review applications submitted for the January 25, 2018 due date and beyond based on the clinical trial designation from the electronic cover page of the application, using the matching review criteria from the FOA. There will be no discussion in the meeting of whether that designation is correct or not. NIH will handle that and any other administrative irregularities outside of the peer review process.

**Funding Opportunity Announcements (FOAs).** Beginning with applications submitted for due dates on or after January 25, 2018, NIH requires that all applications involving one or more clinical trials be submitted through an FOA specifically designed for clinical trials.

- Some Program Announcements and Requests for Applications (PARs and RFAs) may allow both clinical trial and non-clinical trial applications.
- Some FOAs for fellowship, career development award, or training grant applications may not allow clinical trial applications but may allow the applicant to propose to gain experience in a clinical trial led by a sponsor/co-sponsor as part of their research training or career development.

**FOAs that allow clinical trial applications or clinical trial research experience contain additional review criteria that reflect these key features.**

**(See the chart on the next page.)**

**Clinical Trial Allowability in Funding Opportunity Announcements**

| Grant Program | Clinical Trial Not Allowed | Clinical Trial Optional | Clinical Trial Required<br>(at least 1 study record with CT questionnaire questions 1.4.1-1.4.d all Yes or delayed onset study record with anticipated clinical trial box checked) |
|---|---|---|---|
| **Research** | ✔ | ✔ | ✔ |
| **Fellowship** | ✔ Applicants may propose to gain experience in a clinical trial led by a sponsor/co-sponsor as part of their research training. | | |
| **Career Development** | ✔ Applicants may propose to gain experience in a clinical trial led by a mentor/co-mentor as part of their research career development. | | ✔ |
| **Training** | ✔ Appointed trainees are permitted to obtain research experience in a clinical trial led by a mentor or co-mentor. | | |

## PHS Human Subject and Clinical Trial Information form

The new form consolidates all human subjects and clinical trial related information into one place in the application, captures human subject information at the study level, and expands the information required for studies that meet the NIH definition of a clinical trial.

Applicants must answer the following 4 questions for each study entered into the form.

1. Does the 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 being evaluated a health-related biomedical or behavioral outcome?

If the applicant answers yes to the 4 questions, NIH identifies the study as a clinical trial and the applicant must provide additional information on the clinical trial in section IV and V of the form.

This clinical trial designation will appear on the electronic cover sheet of the application.

| | | |
|---|---|---|
| Subtotal Direct Costs<br>(excludes consortium F&A) | Animals: Y<br>~~Humans: N~~<br>Clinical Trial: N<br>~~Current HS Code: 10~~<br>HESC: N | New Investigator: N<br>Early Stage Investigator: N |

Reviewers should **not** discuss whether the applicant used the correct FOA, correct FORMS package, or correct designation to fit the definition of clinical trial but may bring discrepancies to the attention of the SRO for follow-up by NIH.

**Reviewers: Use the review criteria and critique template that correspond to the designation and FOA used by the applicant.**

- A link in the Internet Assisted Review (IAR) site will take you to the review criteria in the FOA for each application or component.
- The SRO will provide the correct critique templates in IAR for you.

**Application structure.** Also with the January 25, 2018 due date, NIH requires applicants to use FORMS-E application packages and associated application guide instructions, which have a new structure and format. (See NOT-OD-17-062.) With the new forms, information is collected at the study level, and one or more study records can support a single Research Strategy in the application.

**Reviewers:**

- **For single-project applications, address all study records in a single critique template.**
- **For multi-component applications:**
  - Each component may have self-contained protocol(s) and the study record(s) will be associated with the component. In this design, address the protocol in one critique template for that component and refer to each study record by the title(s) given by the applicant for that component.
  - Multiple components may share a protocol(s) and the study record(s) will be associated with the Overall section. In this design, address the protocol(s) and study records(s) in the critique template for the Overall section.
  - See the Clinical Trials – Frequently Asked Questions.

## For more information:

- Why Changes to Clinical Trial Policies web page
- Building Better Clinical Trials through Stewardship and Transparency blog post
- Understanding the Definition of a Clinical Trial and What That Means for You podcast (MP3, Transcript)