CLINICAL TRIAL INFORMATION SHEET FOR NIEHS APPLICANTS PROPOSING ACTIVITIES FOR THE NIEHS WORKER TRAINING PROGRAM

An NIH DEFINED CLINICAL TRIAL is 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 (see NOT-OD-15-015).

- It is very important to classify your study correctly
- Clinical trials (CT) are subject to specific requirements, including:
  - Registration and results reporting in ClinicalTrials.gov
  - Good Clinical Practice (GCP) training for investigators and research staff
  - Certain study monitoring requirements
  - Informed consent form posting
  - MORE!
- Specific Clinical Trial Notices of Funding Opportunities (NOFOs) – you may not submit a Clinical Trial to a Clinical Trial Not allowed NOFO! The application may be withdrawn.
- Any applications with misclassified clinical trials may be withdrawn!

This information sheet is intended to help applicants as you write an application for The NIEHS Worker Training Program. Please keep in mind that clinical trial determinations are made on individual applications, as details matter. These tips are meant only to be a guide as you develop your application; generalizations cannot be made.

What Does This Have to do with Training Applications? BE CAREFUL!

- The NIH definition of a clinical trial is very broad and encompasses much more than traditional clinical trials, including those that are pilot, exploratory, behavioral, and basic science!
- **BE CAREFUL that you do not inadvertently submit an application describing an NIH defined clinical trial when you only intended to propose a training program.**
- Be cognizant of the four questions below – if all four answers are YES, the activity is considered a clinical trial:
  - Does the study involve human participants?
  - Are the participants prospectively assigned to an intervention?
  - Is the study designed to evaluate the effect of the intervention on the participants?
  - Is the effect being evaluated a health-related biomedical or behavioral outcome?

A pure training program, using an existing training methodology already known to address specific problems, is not likely to be an NIH defined clinical trial unless the training is being used as an intervention on the participants. HOWEVER, you MAY cross into clinical trial territory:

1. If you propose a training program to answer a question/hypothesis; or
2. You wish to determine IF training will solve an outlined problem; or
3. You are testing a new type of training/tool for training.

Are you still unsure if you are proposing a clinical trial? Let's look at the four clinical trial questions as they relate to applications proposing training. Remember, the clinical trial status of each application is judged on a case-by-case basis. It is difficult to impossible to make broad determinations.

1. **Does the study involve human participants?** It is probably safe to say that all training of humans will involve humans! So, the answer to this one is probably YES.
2. **Are the participants prospectively assigned to an intervention?** This is the most important question for an applicant proposing a training program – It is important for NIEHS Worker Training Program applicants to NOT write the application such that the training is being used as an intervention.
    a. Ensure you are not proposing a research question that the "training" is designed to examine, and ensure you are not testing a new approach to a problem.
        i. Example - **training is NOT an intervention**: Your application indicates that "xyz" training has been shown to decrease "abc" problem. You know that a certain area has "abc" problem and you propose to set up an "xyz" training to address "abc" in that area. The answer to question 2 is NO.

        ii. Example - **training IS an intervention**: Your application indicates that "abc" problem exists. You believe "xyz" training can address "abc" and you propose a training program to determine if you are correct. (You have a hypothesis – even if unstated as a hypothesis, that "xyz" will improve "abc.") You are using "xyz" in this situation as a research intervention/manipulation on the participants. This would be true whether or not "xyz" was a novel or established approach, if "xyz" is not already known to help "abc." The answer to question 2 is YES.

        iii. Example - **training IS an intervention**: Your application indicates you have a novel type of training or training methodology "xyz" to address problem "abc." You propose in your application to test whether "xyz" works to address "abc." The answer to question 2 is YES.

    b. BE CAREFUL IF:
        i. There is a research question.
        ii. You don't know if the training will solve the existing problem.
        iii. You are testing a novel tool, method, or approach.
        iv. You are comparing two methods or approaches.
        v. This list may not be all inclusive, but all of these should make you think carefully.

3. **Is the study designed to evaluate the effect of the intervention on the participants?** This question can be confusing for applications proposing training programs, because most training programs include self-evaluations to ensure the training is having the desired effect and if there are improvements that can be made.

    a. **If the answer to #2 is "yes" and there is an evaluation** – the answer to #3 is likely YES. The questions are likely looking at the effect of the intervention (training) on the participants.

b. **If the answer to #2 is no** – the evaluation is likely a simple "adequacy of training" evaluation, and the answer to this question will be N/A. You cannot measure the effect of a research intervention that doesn't exist.

4. **Is the effect being evaluated a health-related biomedical or behavioral outcome?** ***If the answers to 1-3 are all YES, the answer to number 4 is likely YES as well.*** It is very rare for the answer to #4 to be NO if an application is examining the effect of a research intervention on participants. Remember the following would all be considered health related biomedical or behavioral outcomes:

    a. Change in behavior (positive or negative)
    b. Intent to change behavior (for example intent to get a vaccine). You do not have to be measuring an actual change in behavior.
    c. Change in knowledge.

If the answers to all four questions are YES, the activity is considered a clinical trial even if:

a. It only involves healthy volunteers, students, or trainees.
b. There is no control or comparison group.
c. There is only one arm/group experiencing the intervention or manipulation.
d. It is not randomized.

Applicants are strongly advised to consult with their NIH Program Official (PO) prior to submitting their application if unsure whether their proposed application involves a clinical trial or not.

Useful Resources

- Office of Extramural Research Clinical Trial Webpage
- Clinical Trial Decision Tool
- Division of Human Subjects Research Resources
- Human Subjects, Clinical Trials and Inclusion Resources One-Pager
- NIH Policy on the Dissemination of NIH-Funded Clinical Trial Information
- GCP Training Webpage