Worker Training Program (WTP) Clinical Trial FAQ's

Clinical Trials are not allowed for the WTP SBIR E-Learning for HAZMAT and Emergency Response FOA. Any application that is deemed to be clinical trial using the NIH Clinical Trial definition will not go to review.

The questions and answers below are selected from the NIH Clinical Trials page to be most applicable to our applicants. Please refer to the NIH Clinical Trials page for the full list of questions and answers. It is also suggested that you consider the Basic Experimental Studies Involving Humans (BESH) webpage to help determine whether your application is a clinical trial or not.

1. How can researchers determine whether a proposed study is a clinical trial?
The following questions should be used to determine whether a study meets the NIH clinical trial definition:

- 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?

If the answers are all "yes," the study is a clinical trial.

If any answers are "no," the study is not a clinical trial

2. What is the difference between the clinical trial definition in the revised Common Rule and the NIH clinical trial definition?
NIH considers the two definitions to have the same meaning.

Revised Common Rule §__.102(b): "Clinical trial means 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 the interventions on biomedical or behavioral health-related outcomes."

https://www.gpo.gov/fdsys/pkg/FR-2017-01-19/pdf/2017-01058.pdf

NIH clinical trial definition: "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." (Oct 23, 2014)

https://grants.nih.gov/grants/guide/notice-files/NOT-OD-15-015.html

3. If one aim or a small part of my proposed project in an NIH grant application meets the NIH definition of a clinical trial, is my entire NIH grant application considered a clinical trial?

Yes. If only one aim or a small part of your project meets the NIH definition of a clinical trial, your entire NIH grant application is considered a clinical trial even if the other aims or parts of the research project are not clinical trials. A FOA that allows clinical trials should be chosen, and at least one study record in the application will need to be designated as a clinical trial.

4. Does the primary outcome of a study need to be a health-related outcome in order for a study to be considered a clinical trial?

If any outcome is health-related and the answers to the four questions are all yes, then the study meets the clinical trial definition. You should note, though, that all NIH-funded research investigating biomedical or behavioral outcomes is considered to be health-related. Hence, if the outcome is biomedical or behavioral, the study may be a clinical trial (if the answers to the other three questions are "yes"). Many clinical trials are "mechanistic" or "exploratory" falling outside the realm of efficacy or effectiveness trials.

5. What are some examples of outcomes that are not "health related biomedical or behavioral"?

While the vast majority of NIH-funded studies are health related, a few are not. For example, a study that evaluates if enrollment in a summer internship program alters the student's opinions on their educational pathway would not be assessing a health-related biomedical or behavioral outcome.

Additionally, socioeconomic status (SES) is known to be associated with health-related outcomes and health status; however, NIH would not typically support a study designed to affect SES or modify SES directly. For example, a study designed to correlate SES with health status would be considered an observational study not a clinical trial.

6. What is the sub-definition of "intervention"?

An intervention is defined as a manipulation of the subject or subject's environment for the purpose of modifying one or more health-related biomedical or behavioral processes and/or endpoints. Examples include: drugs/small molecules/compounds; biologics; devices; procedures (e.g., surgical techniques); delivery systems (e.g., telemedicine, face-to-face interviews); strategies to change health-related behavior (e.g., prevention strategies; and, diagnostic strategies.

7. Are measurements the same as interventions?

No; measurements are used to collect data, while interventions are used to modify health-related endpoints. A manipulation or modification in one's behavior or environment for the purpose of measurement alone is not considered a clinical trial.

8. What types of behavioral manipulations or tasks does NIH consider to be interventions?

A manipulation or task is an intervention if it is used to modify a health-related biomedical or behavioral outcome. However, a manipulation or task used expressly for measurement, and not modification, would not be an intervention.

9. Are observational studies, which do not include an intervention, considered to be clinical trials?

No; in order to meet the NIH clinical trial definition there must be an intervention.

10. Are studies that evaluate the effect of an intervention on research participants, but do not have a comparison group (e.g., placebo, control) considered to be clinical trials?

Studies need not include a comparison group to meet the NIH clinical trial definition. As long as all of the elements of the NIH clinical trial definition are met, the study would be considered to be a clinical trial.

11. Are studies that propose to evaluate a clinical intervention or to develop a diagnostic tool considered to be clinical trials?

It depends; studies that involve prospective assignment of human participants to an intervention, which may be a clinical intervention or development of a diagnostic tool, and that are designed to evaluate an effect of the intervention on the participant, where the effect is a biomedical or behavioral health outcome, are clinical trials. (See Case Study https://grants.nih.gov/policy/clinical-trials/case-studies.htm#case7b). Studies designed only to validate the sensitivity or specificity of a tool are not clinical trials (See Case Study https://grants.nih.gov/policy/clinical-trials/case-studies.htm#case7a)

12. Are studies that elicit the opinions or preferences from human participants considered to be clinical trials?

It depends. Studies eliciting opinions or preferences in the absence of an intervention are not considered to be clinical trials. However, studies that gather opinions from participants after an experimental manipulation or intervention, may be clinical trials.

13. Are observational studies, which do not include an intervention, considered to be clinical trials?

No; in order to meet the NIH clinical trial definition there must be an intervention.

14. Are studies that involve only healthy participants considered to be clinical trials?

Yes; studies involving healthy participants are considered clinical trials if all elements of the NIH clinical trial definition are met.

15. Are studies designed to investigate whether a technique can be used to measure a response in research participants considered to be clinical trials?

No; in order to meet the NIH clinical trial definition there must be an intervention.

16. Are studies designed to compare the diagnostic performance of two approved diagnostic devices considered to be clinical trials?

No; a study must be designed to evaluate the effect of the intervention on the human participant to meet the NIH clinical trial definition. In this example, the study is designed to compare the functionality of devices, and not the effect of the devices on the participant.

17. Must a health-related outcome be permanent or lasting in order for a study to be a clinical trial?

No; a transient health-related outcome is sufficient for a study to be considered a clinical trial, as long as all other elements of the NIH clinical trial definition are met.

18. Are studies with just a few research participants considered to be clinical trials?

Yes; the NIH clinical trial definition specifies that there must be one or more human participants involved in the study. Therefore, single case studies or N-of-1 trials are clinical trials. The study is considered to be a clinical trial if all elements of the NIH clinical trial definition are met.

19. Are studies that use correlational designs considered to be clinical trials?

No; studies using correlational designs to prospectively associate biomedical or behavioral parameters with other health-related measures, but do not involve an intervention, do not meet the NIH clinical trial definition.

20. Phase I device studies are not classified as applicable clinical trials (ACTs). Does this mean they do not meet the NIH definition of a clinical trial?

Phase I device studies may or may not meet the NIH definition of a clinical trial. The NIH definition of a clinical trial encompasses many ACTs and also many non-ACTs, including phase 1 trials of FDA-regulated drug and biological products, small feasibility studies of FDA-regulated device products, and studies of any intervention not regulated by the FDA, e.g., behavioral interventions. See our case studies to learn more.