NIH FORMS-E

A SECTION-BY-SECTION REVIEW OF THE PHS HUMAN SUBJECTS AND CLINICAL TRIALS INFORMATION FORM
GETTING TO KNOW NIH FORMS-E

The goal of this guide is to introduce you to the PHS Human Subjects and Clinical Trials Information (HSCT) form that will be implemented under NIH Forms-E. We have included information from the ASSIST and SF424 Application Guides, but you must consult those guides and the Funding Opportunity Announcements (FOA) for complete instructions on how to complete these forms.

General Overview

The new forms are effective and required for submissions with due dates on or after January 25, 2018.

The significant changes brought about by Forms-E relate to how human subjects research information is collected. In the past, this information was scattered throughout the application. Forms-E reorganizes these sections under the new PHS Human Subjects and Clinical Trials Information (HSCT) form and includes additional requirements for projects involving clinical trials.

When will the forms be available?

- Forms are available now and are required for applications due on or after January 25, 2018.
- Parent Funding Opportunity Announcements (FOA) that use standard dates were reissued:
  - with NEW NUMBERS
  - With “Clinical Trial Required” or “Clinical Trial Not Allowed” or “Clinical Trial Optional” versions. Make sure you choose the correct one!

The PHS Human Subjects and Clinical Trials Information Form (HSCT) has five sections, but some sections only apply to certain situations.

SECTION OVERVIEW

- **Basic Information**
  - Required for all studies whether or not clinical trials are involved.

- **Study Population Characteristics**
  - Enrollment table

- **Protection and Monitoring Plans**
  - Protection of Human Subjects upload
  - Single IRB plan upload
  - Data Safety Monitoring Information
  - Study team structure

- **Protocol Synopsis** *(only required if you answered “Yes” to all questions on the Clinical Trial Questionnaire)*
  - Questions and uploads summarizing the study protocol.

- **Other Clinical Trial-related Attachments**
  - FOA-requested/required documents
Key Points and Tips

- You must complete the Other Projects Information tab **FIRST**, in order to access the HSCT form content.
- **The HSCT form is required for all applications.**
- For projects involving clinical trials, the PI will need to provide significantly more information that was previously required.
- Some form fields are only required for certain applications and certain types of studies.
- When you answer “Yes” to Human Subjects on the Other Project Information tab, your application must include:
  - 1 or more full study records, OR
  - 1 or more delayed onset study records, OR
  - A combination of full and delayed onset study records.
- A justification is now **required** for Delayed Onset projects.
- **NIH consolidated the Inclusion of Women & Minorities and Children into One Document.**
- Whether your project involves clinical trials or clinical research, determines how much of the form you need to complete. You may not need to complete all sections of the form.
- **Do not duplicate information between the Research Strategy and this form.**
- Be very careful about changing the answers to the humans subjects involved questions on the Other Project Information tab. Doing so could wipe out the information you’ve entered into this form.
- The Clinical Trial Questionnaire in Section 1 of a New Study record determines whether or not NIH considers your project a clinical trial. This handy chart outlines what you need to complete based on your responses.

<table>
<thead>
<tr>
<th>Form Section</th>
<th>If you answered “yes” to all the questions in the Clinical Trial Questionnaire</th>
<th>If you answered “no” to any of the questions in the Clinical Trial Questionnaire</th>
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</thead>
<tbody>
<tr>
<td>Section 2 - Study Population Characteristics</td>
<td>Required</td>
<td>Required</td>
</tr>
<tr>
<td>Section 3 - Protection and Monitoring Plans</td>
<td>Required</td>
<td>Required</td>
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<tr>
<td>Section 4 - Protocol Synopsis</td>
<td>Required</td>
<td>Do not complete</td>
</tr>
<tr>
<td>Section 5 - Other Clinical Trial-related Attachments</td>
<td>Required if specified in the FOA</td>
<td>Do not complete</td>
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</tbody>
</table>
Getting Started

You must complete the Other Project Information page first, because answering Question 1 determines the content of the Human Subjects and Clinical Trials form. If you try to access the HSCT form first, you’ll find that it is blank. ASSIST includes reminders on both forms about which order you need to complete them in.

Below is a summary of the general instructions for this form for research applications. The instructions for Career, Fellowship and Training applications may vary; any differences will noted in the relevant sections.
When you first access the HSCT form you’ll start on this summary page. The content of the page will vary depending on whether your project involves human subjects. For projects that do not involve human subjects, you will only complete this page. For projects that involve subjects, you will create and add your study records and delayed onset studies to this page.

Notice that top section is pre-populated with your responses to Question 1 on the Other Project information form. You will need to click “Edit” in order to add the study information.

Let’s look at how to complete the HSCT form for projects that do not involve human subjects.
If you answered “No” to Human Subjects on the Other Project Information page, you are still required to complete the If No to Human Subjects section below.

Answer the question: “Does the proposed research involve human specimens and/or data?”

- Respond “No” and congratulations: You’ve completed the form! Note that in above image, the justification slot is inactive, because no additional justification is required.

- If the answer is “Yes”, the unlabeled justification slot activates, because an additional response is required.

You must upload a justification that explains why you feel your application does not involve human subjects.

Your justification should include:

- information on who is providing the data/biological specimens and their role in the proposed research;
No Human Subjects (cont.)

- a description of the identifiers that will be associated with the human specimens and data;
- a list of who has access to subjects’ identities; and
- information about how the privacy of research participants and confidentiality of data will be protected.

Other Requested Information

Only use if required by the FOA. The FOA will provide instructions for creating the Other Required Information document, if one is required for submission. **Leave this field blank otherwise. Do not upload a “N/A” file.**

For multi-project applications:

*If you have studies that span multiple components, in the overall component upload a file that describes the components involved. In the individual components use this field to explain that the study details are in the Overall component.*

**After completing the above, you can skip the remaining sections of the form.**
Human Subjects Involved

Adding a New Delayed Onset Study

A delayed onset study refers to a study that is expected to occur within the grant period, but plans cannot be defined at the application stage. It is not a study that can be defined at application, but has a delayed start.

If your project includes a delayed onset study, upload a justification explaining why the study details cannot be described in the application. You can consolidate the justification for multiple delayed onset studies within your application into one document.

Click the Add button in the Add/Update Attachment column to upload your justification or to upload a corrected version of a file you previously updated. Click View to view a PDF of the file you uploaded.

If you mistakenly added a delayed onset study, click the Delete on Save box, then Save the page. Once the page reloads, your Onset Study is removed.

A note about other mechanisms:

If you are submitting a K12 or D43 application that includes planned human subjects studies, enter that information using the Add Delayed Onset Study option instead of the Add New Study Option. The HSCT form is not used for any other Training applications.
Adding a New Study Record

ASSIST offers two options for completing a study record—complete it in ASSIST or download a PDF form to complete offline and upload later. Clicking the Add Study Record opens a webform version of the form that validates as you enter and save information. Do move to a new page or section without saving first.

Section 1: Basic Information

This section needs to be completed for all applications.

1.1. **Study Title:**
This required field can hold a max of 600 characters. Each study title must be unique to JHU.

1.2. **Study Exempt from Federal Regulations?**
This seems like a rehash of the question 1 on the Other Project Information tab, but instead of asking the overall project, this question relates to this study specifically. Check Yes or No to indicate whether your study is exempt.

1.3. **Exemption Number:**
Only required if you answered yes to 1.2. If your study is exempt, check the appropriate number. Do not use 7 or 8.

1.4. **Clinical Trial Questionnaire:**
Response required. Answer these questions based on the study you are describing in this study record, not for the entire project. Answering Yes to all of the questions, flags this study as a clinical trial and you will be required to provide trial-specific data in the remaining sections of the form.
Section 1 – Basic Information (cont.)

1.4. Clinical Trial Questionnaire

If the answers to all four questions below are yes, this study meets the definition of a Clinical Trial.

1.4.a. Does the study involve human participants?  
1.4.b. Are the participants prospectively assigned to an intervention?  
1.4.c. Is the study designed to evaluate the effect of the intervention on the participants?  
1.4.d. Is the effect that will be evaluated a health-related biomedical or behavioral outcome?

- If you answered Yes to all questions, you need to complete Section 1-4 of the HSCTI form.
- If you answered No to any of these questions, you will only need to complete Sections 1-3 of the HSCTI form.

1.5. ClinicalTrials.gov Identifier: Optional. If applicable, add the clinical trial identifier. If this is an ancillary study, enter the trial identifier for the ancillary study, not the parent study.
SECTION 2 - Study Populations Characteristics.

This section collects data on study eligibility, recruitment and patient demographic information.

This section is not required if your study is under exemption 4.

2.1. Conditions/Focus of Study.
Click the Add New Condition button. Enter the name of the disease or condition you are studying. One condition per entry. Use NLM Medical Subject Headings, if possible. You must add a minimum of one entry. 20 max. Each entry is limited to 255 characters.

2.2. Eligibility Criteria.
In 15,000 characters or less describe the study’s exclusion and inclusion criteria. Additional explanation or justification should be included in the Recruitment and Retention Plan.

2.3. Age Limits.
Enter the numerical values, if known and provide the relevant unit of time. Choose N/A if there are no limits or none of the options apply.

If choosing N/A leave the “Time” field blank. Choose from the following options:
SECTION 2 - Study Populations Characteristics (cont.)

- Years
- Months
- Weeks
- Days
- Hours
- Minutes
- N/A (No limit)

2.4 Inclusion of Women, Minorities, and Children.
Use one file to address the two sections: INCLUSION OF WOMEN AND MINORITIES and INCLUSION OF CHILDREN. Follow the detailed instructions in the application guide and/or the FOA for how to compose these sections.

2.5 Recruitment and Retention Plan.
Attach a document that describes how you will recruit participants and your proposed engagement strategies. A response is required if unless you have selected Exemption 4 or No to human subjects.

2.6 Recruitment Status.
Required unless you have selected Exemption 4 or No to human subjects. Choose the option that best describes what you are proposing from the following:

- Not yet recruiting
- Recruiting
- Enrolling by invitation
- Active, not recruiting
- Completed
- Suspended
- Terminated (Halted Prematurely)
- Withdrawn (No Participants Enrolled)

2.7 Study Timeline.
Upload a PDF document that provides a general timeline (text or a diagram) without specific dates. Required unless you have selected Exemption 4 or No to human subjects.

2.8 Enrollment of First Subject.
Enter the Actual or Anticipated date using MM/DD/YYYY format. Required unless you have selected Exemption 4 or No to human subjects.
SECTION 2 – Study Populations Characteristics (cont.)

Inclusion Enrollment Reports (IER)

Once standalone forms, now they are part of the study record. Click the Add New Inclusion Enrollment Report to get started. If the proposed study falls under Exemption 4, you must include at least one IER. Fields marked with an asterisk are required.

- One study record can contain up to 20 IER’s.
- Follow the FOA and application guide instructions for completing these forms. There may be special instructions for renewals, resubmissions and multi-project applications.
SECTION 3 - Protection and Monitoring Plans

Unless noted otherwise, this section is required for all studies involving human subjects.

3.1. Protection of Human Subjects.
Required for all studies that involve human subjects. Do not use this section to circumvent the Research Strategy. Consult the application guide for instructions on how to complete this section. Some of the information that was required under Forms-D is now collected in other sections of the study record.

- **PERFORMING RESEARCH THAT CLAIMS EXEMPTIONS?** Upload a justification for how your proposed research meets the criteria for the exemption claimed.

- **PERFORMING NON-EXEMPT HUMAN SUBJECTS RESEARCH?** Include the following sections in order:
  - Risks to Human Subjects,
  - Adequacy of Protection Against Risks,
  - Potential Benefits of the Proposed Research to Research Participants and Others, and
  - Importance of the Knowledge to be Gained.

Refer to the FOA and the NIH application guide for the complete instructions on how to respond to these sections.

3.2. **Is this a multi-site study that will use the same protocol to conduct nonexempt human subjects research at more than one domestic site?**

- Select "Yes" or "No" to indicate whether this is a multi-site study that will use the same protocol to conduct non-exempt human subjects research at more than one domestic site. Single IRB (sIRB) is required if you answer Yes and you must upload a description of your sIRB plan.

- Select “N/A” if any of the following apply (do not select “N/A” if none of the following apply):
  - You answered “Yes” to “Question 1.2 Is this Study Exempt from Federal Regulations?”
  - You are a career development applicant (**SIRB DOES NOT APPLY**)
  - You are a training applicant (**SIRB DOES NOT APPLY**)
  - You are a fellowship applicant (**SIRB DOES NOT APPLY**)
SECTION 3 - Protection and Monitoring Plans

3.3. **Data and Safety Monitoring Plan.**

Required if you answered yes to all questions in the clinical trial questionnaire at the beginning of this form. For human subjects research that does not involve a clinical trial, but may have significant risks to participants a response is optional.

- For CDA and Fellowship applications that propose to gain clinical trials experiences, your DSMP should only include the following:
  - Names of those responsible for monitoring the trial and the name of an independent safety monitor or data safety monitoring board, if applicable.

3.4. **Will a Data and Safety Monitoring Board be appointed?**

Required if you answered yes to all the question in the clinical trial questionnaire at the beginning of this form. Optional for other human subjects research.

3.5. **Overall Structure of the Study Team.**

Required if you answered yes to all the question in the clinical trial questionnaire at the beginning of this form. Optional for other human subjects research. Briefly provide an overview of the organizational structure of the team, particularly admin site, data coordinating sites. Enrollment/participating sites and any separate labs/testing centers.
SECTION 4 – PROTOCOL SYNOPSIS

Required if you answered yes to all the question in the clinical trial questionnaire at the beginning of this form. DO NOT COMPLETE if you answered No to any of the questionnaire. CDA and Fellowship applicants who propose to gain clinical trial experience should not complete this section.

4.1. Brief Summary. In the box provided, briefly describe the objectives of the protocol, include secondary and primary endpoints. Limit your response to 5,000 characters or less.

4.2. Study Design.

4.2.a. Narrative Study description. Describe how you plan to assign participants and deliver intervention and explain how your methods for sample size and data analysis are appropriate for those plans. Your response is limited to 32,000 characters.

4.2.b. Primary Purpose. Select the best option that describes the primary purpose of your study from the following:

- Treatment
- Prevention
- Diagnostics
- Supportive Care
- Screening
- Health Services Research
- Basic Science
- Device Feasibility
- Other - provide a description (limited to 255 characters) in the space provided.
**SECTION 4 – PROTOCOL SYNOPSIS (cont.)**

4.2.c. **Interventions.** Click the Add New Intervention button to add up to 20 Interventions that will be used in your proposed study.

Choose an Intervention Type from the following:

- Drug (including placebo)
- Device (including sham)
- Biological/Vaccine
- Procedure/Surgery
- Radiation
- Behavioral (e.g., Psychotherapy, Lifestyle Counseling)
- Genetic (including gene transfer, stem cell, and recombinant DNA)
- Dietary Supplement (e.g., vitamins, minerals)
- Combination Product
- Diagnostic Test
- Other

Add a name and description for each intervention in the space provided. Note the character limits for each field.

4.2.d **Study Phase.** Select the option that best describes your study. Choose from the following:

- Early Phase 1 (or Phase 0)
- Phase 1
- Phase 1/2
- Phase 2
- Phase 2/3
- Phase 3
- Phase 4
- Other
  - Choose “Other” if your study involves a device. Provide a description (limited to 255 characters) in the space provided.
  - Note the follow up question to indicate whether this is an NIH-defined Phase III clinical trial.
4.2.e. Intervention Model. Enter or select from the dropdown menu a single "Intervention Model" that best describes the clinical trial. Choose from the following options:

- Single Group
- Parallel
- Cross-Over
- Factorial
- Sequential
- Other
  - If you select “Other,” provide a description (limited to 255 characters) in the space provided.

4.2.f. Masking. Select "Yes" or "No" to indicate whether the protocol uses masking or blinding. If you answer “Yes”, select from the following the type of masking that best describes the protocol.

4.2.g. Allocation. Enter or select from the dropdown menu a single "Allocation" that best describes how subjects will be assigned in your protocol. Choose from “N/A”, “Randomized” or “Non-randomized”. If allocation is not applicable to your clinical trial, select “N/A” (e.g., for a single-arm trial).

4.3. Outcomes Measures. Click the Add New Outcome to enter information on your study about proposed outcomes measures.
SECTION 4 - PROTOCOL SYNOPSIS (cont.)

From the drop down box, select an outcome measure type to describe the important measures to be collected during your proposed clinical trial. You may have more than one primary outcome measure, and you can add up to fifty (50) outcome measures.

4.3 Outcomes or Measures

<table>
<thead>
<tr>
<th>Name</th>
<th>Type</th>
<th>Time Frame</th>
<th>Brief Description</th>
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- **Name**: Enter a unique name for each outcome measure.
- **Type**: choose from: Primary, Secondary or Other.
- **Time Frame**: Describe when the measure will be collected for analysis.
- **Brief Description**: If additional information is needed to describe the metric that will be used to characterize the outcome measure, enter it here.

4.4 Statistical Design and Power.
Upload a file that outlines how many patients you plan to enroll, expected effect size, power and statistical methods you will use for each outcome measure listed in 4.3.

4.5 Subject Participation Duration.
In the field provided, enter the time in months it will take for each participant to complete all study visits.

4.6 Will the study use an FDA-regulated intervention?
If yes, upload a PDF describing the availability of Investigational Product (IP) and Investigational New Drug (IND)/Investigational Device Exemption (IDE) status.

4.7 Dissemination Plan.
Briefly explain how you plan to disseminate NIH-funded clinical trial information in accordance with NIH policy.
- One plan is required for each study. You may either attach the same Dissemination Plan to different studies or attach a file that refers to the
- Dissemination Plan in another study within your application. For example, you may attach a file that says “See Dissemination Plan in the 'My Unique Study Name' study.”
- Do not include informed consent documents.
SECTION 4 - PROTOCOL SYNOPSIS (cont.)

- For delayed on-set studies, include the dissemination plan info in the delayed onset study justification.

SECTION 5 - OTHER CLINICAL TRIAL-RELATED ATTACHMENTS

This section is only used in clinical study records where specifically required in the FOA. Instructions for completing this section will be provide in the FOA.

RESOURCES

- Walkthrough of the PHS Human Subjects and Clinical Trials Information Form (9 min.):
  https://grants.nih.gov/policy临床 trials/new-form/video
- NIH Application Guide:
- Annotated Forms-E Set: