



UNIVERSITY OF CALIFORNIA, SAN DIEGO HUMAN RESEARCH PROTECTIONS PROGRAM

NIH Definition of a Clinical Trial

The NIH has recently changed their definition of clinical trial. This Fact Sheet provides information regarding this change and what it means to investigators.

NIH guidelines include the following: “Correctly identifying whether a study is considered to be a clinical trial is crucial to how [the investigator] will: Select the right NIH funding opportunity announcement for [the investigator’s] research... Write the research strategy and human subjects section of the [investigator’s] grant application and contact proposal... Comply with appropriate policies and regulations, including registration and reporting in ClinicalTrials.gov.”

NIH defines a clinical trial as “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.”

NIH notes, “The term “prospectively assigned” refers to a pre-defined process (e.g., randomization) specified in an approved protocol that stipulates the assignment of research subjects (individually or in clusters) to one or more arms (e.g., intervention, placebo, or other control) of a clinical trial.

And, “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., diet, cognitive therapy, exercise, development of new habits); treatment strategies; prevention strategies; and, diagnostic strategies.”

NIH defines a "health-related biomedical or behavioral outcome" as “the pre-specified goal(s) or condition(s) that reflect the effect of one or more interventions on human subjects’ biomedical or behavioral status or quality of life. Examples include: positive or negative changes to physiological or biological parameters (e.g., improvement of lung capacity, gene expression); positive or negative changes to psychological or neurodevelopmental parameters (e.g., mood management intervention for smokers; reading comprehension and /or information retention); positive or negative changes to disease processes; positive or negative changes to health-related behaviors; and, positive or negative changes to quality of life.”

Simply put, if the answer is “Yes” to all four of the following questions, the clinical study would be considered a clinical trial by NIH:

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?

NIH also provides this additional guidance that indicates that if the answers to the 4 questions are yes, the study meets the NIH definition of a clinical trial, even if...

1. The Investigator is studying healthy participants.
2. The study does not have a comparison group (e.g., placebo or control).
3. The study is only designed to assess the pharmacokinetics, safety, and/or maximum tolerated dose of an investigational drug.
4. The study is utilizing a behavioral intervention.

NIH further indicates that studies intended solely to refine measures are not considered clinical trials and that studies that involve secondary research with biological specimens or health information are not clinical trials.

Investigators should also be aware that a clinical trial may require registration with ClinicalTrials.gov.

For more information about NIH and Clinical Trials, please see the NIH website at <https://grants.nih.gov/policy/clinical-trials.htm>.