R

Read 1/1/73
Copies to
all MD's,
Adm Comm,
Inst Review

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
PUBLIC HEALTH SERVICE
NATIONAL INSTITUTES OF HEALTH
BETHESDA, MARYLAND 20014

January 3, 1973 725432

TO : Officers Responsible for Institutional Implementation of DHEW Policy on Protection of Human Subjects

FROM : Chief, Institutional Relations Branch, Division of Research Grants, NIH, DHEW

SUBJECT: Considerations in the Review of Projects (4)

Submission of Data in Applications Including the Use of Human Subjects

In the course of carrying out our responsibilities for administration of DHEW policy on the protection of human subjects, we have noted that questions raised by DHEW reviewers frequently reflect inadequate and incomplete proposals. Correspondence from the applicant institutions often indicate that the institutional committee either obtained additional information from the investigator or that the committee actually reviewed a more extensive protocol than that which was submitted to DHEW.

Such additional data may include descriptions of the kind of patients (subjects) to be used, possible discomforts to subjects, potential hazards to subjects, safeguards to be used, mechanisms for maintaining individual privacy, methods of obtaining informed consent of human subjects, and copies of the consent proposal.

Here are some examples of replies to our letters:

> "I am enclosing photostatic copies of the protocols which were submitted to us; and as you can see, the clinical investigators have very well outlined the hazards and risks involved and the proposed manner in which they were to be handled."

> "As you can see, most of the misunderstanding or misinterpretation of the proposal arose from my failure to outline the procedural details of what I intended to do, and the assumptions made by the members of the NIH review committee in filling in the gaps."

> "I have read again Dr. ---'s application and can understand from its wording the sources of the reviewers' concern. Our institutional committee had available to it supplemental information that led us to conclude that Dr. ---'s proposed study would not jeopardize patient care."

BEST COPY AVAILABLE

1176998

> "Venesection is not performed if the patient's physical condition might be impaired by performing the procedure. Page --, paragraph -- should read, 'If the hematocrit falls below 80 percent of the initial value, or below 30 percent, further venesection will be postponed.'"

Grants Administration Chapter 1-40, under Policy (1-40-20) not only specifies that no grant or contract for an activity involving human subjects shall be made unless the application for such support has been reviewed and approved by an appropriate institutional committee, but also states that since the welfare of subjects is a matter of concern to the DHEW as well as to the institution, no grant or contract shall be made unless the proposal for such support has also been reviewed and approved by an appropriate professional committee within the responsible component of the Department.

The policy further states that this review must establish that the activity, as described in the proposal (underlining provided), will not interfere with or impair the rights and welfare of the subjects, nor involve risks that outweigh either potential benefits to the subjects or the expected value of the knowledge sought, nor deny the rights of the subject to adequate and appropriate informed consent.

Since projects involving human subjects at risk are only a small percentage of all applications made to the DHEW, formal program instructions seldom emphasize the occasionally critical nature of information concerning selection of subjects, protection of their rights and welfare, and obtaining their informed consent. An NIH informational document notes:

> "The clarity with which you present your proposal is critically important--both from the standpoint of effectively communicating your ideas to the reviewers, and also as an indication of your understanding and grasp of the problem you propose to investigate. Frequent criticisms are that writing is obscure and that details are lacking. Obscurity in writing often reflects that the investigator has not thought through his problem sufficiently."

Institutional committees should alert investigators to this problem. If the institutional committee feels that additional information is needed for adequate review, it is very likely that DHEW reviewers will also benefit from it. Additional information supplied to local committees and not included in the application may be attached as an appendix. Committees should advise changes in applications prior to submission or amendment of applications complete and already in house. Ultimate responsibility for providing adequate information lies with the applicant investigator.

D. T. Chalkley, Ph. D.

1176999