

This template is based on the NIH instructions here: <https://grants.nih.gov/grants/how-to-apply-application-guide/forms-g/general/g.500-phs-human-subjects-and-clinical-trials-information.htm#3.1>

For Studies that involve Non-Exempt Human Subjects Research: For any proposed non-exempt study involving human subjects, NIH requires a Protection of Human Subjects attachment that is commensurate with the risks of the study, its size, and its complexity. Organize your attachment into four sections, following the headings and specified order below, and discuss each of the points listed below.

When document is complete, delete this box and save as PI LAST NAME_3.1 Protection of Human Subjects_DDMMYYEAR (example-01JAN2022)

NIH-recommended fonts: Arial, Georgia, Helvetica, Palatino Linotype, 11 pt or larger, margins .05 or larger <https://grants.nih.gov/grants/how-to-apply-application-guide/format-and-write/format-attachments.htm>

For more information:

Refer to the [NIH's Human Subjects Research website](#).

3.1 PROTECTION OF HUMAN SUBJECTS

1. Risks to Human Subjects

a. Human Subjects Involvement, Characteristics, and Design

- Briefly describe the overall study design.
- Describe the subject population(s) to be included in the study; the procedures for assignment to a study group, if relevant; and the anticipated numbers of subjects for each study group.
- List any collaborating sites where human subjects research will be performed, and describe the role of those sites and collaborating investigators in performing the proposed research.

b. Study Procedures, Materials, and Potential Risks

- Describe all planned research procedures (interventions and interactions) involving study subjects; how research material, including biospecimens, data, and/or records, will be obtained; and whether any private identifiable information will be collected in the proposed research project.
- For studies that will include the use of previously collected biospecimens, data or records, describe the source of these materials, whether these can be linked with living individuals, and who will be able to link the materials.
- Describe all the potential risks to subjects associated with each study intervention, procedure or interaction, including physical, psychological, social, cultural, financial,

and legal risks; risks to privacy and/or confidentiality; or other risks. Discuss the risk level and the likely impact to subjects.

- Where appropriate, describe alternative treatments and procedures, including their risks and potential benefits. When alternative treatments or procedures are possible, make the rationale for the proposed approach clear.

2. Adequacy of Protection Against Risks

a. Informed Consent and Assent

- Describe the process for obtaining informed consent. Include a description of the circumstances under which consent will be sought and obtained, who will seek it, the nature of the information to be provided to prospective subjects, and the method of documenting consent. When appropriate, describe how potential adult subjects' capacity to consent will be determined and the plans for obtaining consent from a legally authorized representative for adult subjects not able to consent.
 - **For research involving children:** If the proposed studies will include children, describe the process for meeting HHS regulatory requirements for parental permission and child assent ([45 CFR 46.408](#)). See the HHS page on [Research with Children FAQs](#) and the NIH page on [Requirements for Child Assent and Parent/Guardian Permission](#).
- If a waiver of some or all of the elements of informed consent will be sought, provide justification for the waiver. Do not submit informed consent document(s) with your application unless you are requested to do so.

b. Protections Against Risk

- Describe planned strategies for protecting against or minimizing all potential risks identified, including strategies to manage and protect the privacy of participants and confidentiality of research data.
- Where appropriate, discuss plans for ensuring necessary medical or professional intervention in the event of adverse effects on participants.
- Describe plans for handling incidental findings, such as those from research imaging, screening tests, or paternity tests.

c. Populations that are vulnerable to coercion or undue influence and pregnant women, fetuses and neonates, if relevant to your study

Explain the rationale for the involvement of populations that are vulnerable to coercion or undue influence, such as children, prisoners, individuals with impaired decision-making capacity, or economically or educationally disadvantaged persons or others who may be considered vulnerable populations. 'Prisoners' includes all subjects involuntarily

incarcerated (for example, in detention centers). Additionally, explain the rationale for the involvement of pregnant women, human fetuses and neonates.

Pregnant Women, Fetuses, and Neonates or Children

If the study involves subjects afforded additional protections under Subparts B and D (pregnant women, fetuses, and neonates or children), provide a clear description of the risk level and additional protections necessary to meet the HHS regulatory requirements.

- HHS' [Subpart B - Additional Protections for Pregnant Women, Fetuses, and Neonates](#)
- HHS' [Subpart D - Additional Protections for Children](#)
- OHRP Guidance on Subpart D [Special Protections for Children as Research Subjects](#) and the [HHS 407 Review Process](#)

Prisoners

If the study involves vulnerable subjects afforded additional protections under Subpart C (prisoners), describe how proposed research meets the additional regulatory requirements, protections, and plans to obtain OHRP certification for the involvement of prisoners in research.

Refer to HHS regulations, and OHRP guidance:

- HHS' [Subpart C - Additional Protections Pertaining to Prisoners as Subjects](#)
- OHRP Subpart C Guidance on [Involvement of Prisoners in Research](#)

3. Potential Benefits of the Proposed Research to Research Participants and Others

- Discuss the potential benefits of the research to research participants and others.
- Discuss why the risks to subjects are reasonable in relation to the anticipated benefits to research participants and others.
- **Note:** Financial compensation of subjects should not be presented as a benefit of participation in research.

4. Importance of the Knowledge to be Gained

- Discuss the importance of the knowledge to be gained as a result of the proposed research.
- Discuss why the risks to subjects are reasonable in relation to the importance of the knowledge that reasonably may be expected to result.