# IMPLEMENTATION OF THE NIH GUIDELINES ON THE INCLUSION OF WOMEN AND MINORITIES AS SUBJECTS IN CLINICAL RESEARCH 

Comprehensive Report
(Fiscal Year 1997 Tracking Data)

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## Implementation of the Revised NIH Policy on the Inclusion of Women and Minorities as Subjects in Clinical Research

In 1994, the NIH revised its inclusion policy to meet the specific mandate of the NIH Revitalization Act of 1993 (PL 103-43) that women and minorities must be included in all of its clinical research studies. The Revitalization Act essentially reinforced the existing NIH policies, but with four major differences:

- that NIH ensure that women and minorities and their subpopulations be included in all human subject research;
- that women and minorities and their subpopulations be included in Phase III clinical trials in numbers adequate to allow for valid analyses of differences in intervention effect;
- that cost is not allowed as an acceptable reason for excluding these groups; and,
- that NIH initiate programs and support for outreach efforts to recruit and retain women and minorities and their subpopulations as volunteers in clinical studies.

Revised inclusion guidelines developed in response to this law were published in the Federal Register in March 1994, and they became effective in September 1994 for proposals submitted after June 1, 1994.

Strategies to ensure that the implementation of the revised guidelines is uniform across the NIH were developed through the establishment and deliberations of an NIH Tracking and Inclusion Committee made up of representatives of the directors of each of the Institutes and Centers (IC). This trans-NIH committee meets on a regular basis, focusing on consistent and widespread adherence to the NIH guidelines by all the institutes and centers. Working in collaboration with the Office of Extramural Research, the Office of Intramural Research, and other components of the NIH, the Office of Research on Women's Health coordinates the activity of developing and establishing data collection and reporting methodologies to ensure uniform standards and definitions in the reporting of data on the participation of women and minority volunteers in NIH-funded research.

To ensure universal adherence to the new inclusion guidelines, NIH conducted extensive training on the revised inclusion guidelines for more than 1,000 NIH staff members with review, program, grants management, or contract management responsibilities. NIH staff, in turn, explained the requirements to applicants, reviewers, and other members of the research community. NIH staff members, reviewers, and applicants received written guidance about the requirements. This guidance outlined in great detail the circumstances under which it may be acceptable to use study populations deficient in women or minority participants, pointing out that the justification must be compelling and the scientific objectives of the research must be maintained. Training was especially important in response to 1990 findings by the U.S. General Accounting Office (GAO) that an earlier policy was inconsistently applied and had not been well communicated or understood within the NIH or in the research community.

Recognizing the importance of both recruitment and retention of human subject volunteers, NIH issued an outreach notebook that outlines elements of outreach processes, offers practical suggestions, and provides references to additional sources of information. This outreach notebook also includes the full text of the 1994 implementation guidelines as well as a questions and answers document which was prepared in order to provide more detailed policy guidance and some of the more commonly asked questions. The ORWH also has available a full report of its workshop on "Recruitment and Retention of Women in Clinical Studies."

A variety of outreach activities were initiated to explain the revised policy to the scientific research community and to clear up common misunderstandings about the new requirements. For example, in June 1994, the ORWH convened a meeting of Institutional Review Board (IRB) chairs to discuss their role in implementing the revised policy. In 1996, ORWH reconvened these IRB chairs, along with representative members of the ORWH Recruitment and Retention Task Force, other experts, and representatives from NIH ICs, to discuss their experiences in implementing the 1994 guidelines. In these meetings, investigators expressed a number of lingering concerns, most notably whether it was realistic for the law to declare that cost is not a factor in designing clinical studies. Participants also raised questions about inclusion of women of childbearing potential, liability in clinical trials, and barriers to the recruitment of minority subjects. Other participants, however, noted that their worst fears about the 1994 guidelines did not materialize, in part because NIH focused on scientific considerations when developing its policy. They reported improved collaboration among institutions and emphasized the continued need for better outreach and for sharing information about effective recruitment strategies. Many noted the importance of considering community concerns, particularly those of minority populations who may feel that they are not included in enough research studies or who do not receive research results after participating in studies.

The policy and procedures for meeting the new requirements have been fully implemented. Studies that do not meet the standards are identified through the scientific review process. The level of compliance is high, and activities will continue to ensure adherence to the revised guidelines.

NIH is now able to monitor demographic data for study populations on an NIH-wide basis through a computerized tracking system. Analysis of data for which NIH-wide data are available (FY1997) show that substantial numbers of both women and minorities have been included as research subjects in Phase III clinical trials and other human subject research studies, in both intramural and extramural programs. During FY1997, more than $93 \%$ of applications involving human subjects met the inclusion requirement as submitted [Table 1].

Aggregate enrollment data for extramural Phase III clinical trials funded in FY1997 show that approximately 74.8\% of the subjects were women. Among minority subjects, ${ }^{1}$ representation in Phase III clinical trials [Table 97D] was highest for Black (not Hispanic) subjects (14\%) and lowdst for American Indians/Alaskan Natives subjects (1.6\%). Asian/Pacific Islanders subjects were $1.7 \%$ of the extramural Phase III subjects; Hispanic subjects were $5.4 \%$; and White (not Hispanic) subjects were $75.1 \%$. Over six million subjects were included in the research for which data were collected in the tracking system from among all extramural research active in FY1997. This snapshot of aggregate enrollment data for FY1997 extramural studies [Table 97A] shows that approximately $62 \%$ of the subjects were women, approximately $37 \%$ were men, and approximately $1 \%$ were not identified by sex/gender.

Substantial numbers of women and minorities were also included in NIH intramural protocols conducted at the Warren G. Magnuson Clinical Center in FY1997 [Table 97G]. Data showed $49.6 \%$ of intramural subjects were women and $50.4 \%$ were men. Among minority subjects, representation in intramural protocols conducted at the Clinical Center was highest for Black (not Hispanic) subjects ( $11 \%$ ) and lowest for American Indian/Alaskan native subjects $(0.1 \%)$. Asian/Pacific Islander subjects were $4.3 \%$ of the subjects in this intramural research; Hispanic subjects were $3.2 \%$; and White (not Hispanic) subjects were $80.1 \%$.

[^0]When assessing inclusion data, enrollment figures should not be directly compared to the national census figures. The goal of the NIH policy is not to satisfy any quotas for proportional representation, but rather to conduct biomedical and behavioral research in such a manner that the scientific knowledge acquired will be generalizable to the entire population of the United States. The numbers of women or minority subgroups included in a particular study depends upon the scientific question addressed in the study and the prevalence among women and minority subpopulations of the disease, disorder, or condition under investigation. Initial Review Groups are instructed to focus on scientific considerations when assessing the planned enrollment for a particular study.

The aggregate data enable the NIH to measure inclusion in order to formulate more specific questions about gaps in enrollment, to design studies to respond to those questions that allow for longitudinal examination of trends and continued monitoring of compliance. An application that fails to meet the standards for inclusion receives an unacceptable gender or minority code, which results in an administrative bar-to-funding (Appendix A). For most of the awards that were initially barred, the applicants were able to remedy the deficiencies found during initial review by providing additional information. In some instances, studies may have met the inclusion requirement but the justification was not apparent to the reviewers. In such cases, it is each applicant's responsibility to submit a complete research plan and to provide convincing justification before review.

NIH's administrative procedures allow further consideration of such applications during the second level of review. The program staff has the flexibility to work with an applicant and resolve problems within the time constraints of the review-council cycle. In some cases, the program staff may find lack of inclusion in an individual study to be justified if that same scientific question is addressed elsewhere for other populations so that, when viewed in their entirety, the combined studies fulfill the inclusion requirement. Similar procedures are in place for projects funded through contracts.

In compliance with the provisions of the NIH Revitalization Act, the Advisory Council of each IC has reviewed IC procedures for implementation of NIH guidelines for the inclusion of women and minorities in clinical research. In 1999, Advisory Councils reported that all ICs were in compliance with the NIH Implementation Guidelines, which included analysis of FY1997 data.

Reports from the Advisory Councils, ${ }^{2}$ describing individual IC procedures for the implementation of the guidelines and data on inclusion of women andminorities in human subject research included the following observations:

- Scientific Review Groups (SRGs) and scientific program staff were found to be diligent and rigorous in implementing the policies and procedures for meeting the requirements of the NIH guidelines.
- Institute review, program, and grants management staff have attended the extensive training sessions on the inclusion guidelines conducted by NIH. Institute staff, in turn, explain the requirements to applicants, reviewers, and other members of the research community.
- Health scientist administrators (program) review progress reports for funded grants to ensure continued compliance as approved in the initial grant application.
- Advisory Council members continue to be kept aware of the inclusion requirements. During Council meetings, Advisory Council members are informed of concerns regarding the inclusion requirements identified in the review of grant applications.


## Inclusion of Women and Minorities in Clinical Research - Future Directions

Future endeavors include efforts to expand the analysis of demographic data collected for clinical studies in order to determine ongoing and changing trends in enrollment and assess their meaning. Target data for Phase III Clinical Trials are being collected, and ways to assess this data in a meaningful manner are under discussion.

[^1]The issue of reporting foreign populations has made clear the occasional need to develop points of clarification for tracking population data. More than two-thirds of the ICs that fund research involving foreign populations reported them the same way they did U.S. populations, i.e., a breakdown by gender/ethnicity in the population matrix found in the PHS 398 form. Of the remainder, some reported them as other/unknown, others used an exception code, and still others are not funding studies with foreign subjects.

The Application for a PHS Grant (Form PHS 398) states, "The NIH policy is that women and members of minority groups and their subpopulations must be included in all NIH-supported biomedical and behavioral research projects involving human subjects, unless a clear and compelling rationale shows that inclusion is inappropriate with respect to the health of the subjects or the purpose of the research." Therefore:

- Tracking foreign populations ensures compliance with the policy.
- Tracking foreign populations provides unique opportunities to collect data on subpopulations where knowledge gaps exist. In fact, subpopulations are the focus of many current foreign grants.
- Reporting foreign populations as other/unknown or excluding them could create the impression that NIH is intentionally skewing data to hide non-compliance with the policy.

The NIH Guidelines on the Inclusion of Women and Minorities as Subjects in Clinical Research state:
For foreign awards, the NIH policy on inclusion of women in research conducted outside the U.S. is the same as that for research conducted in the U.S.

However, with regard to the population of the foreign country, the definition of the minority groups may be different than in the U.S. If there is scientific rationale for examining subpopulation group differences within the foreign population, investigators should consider designing their studies to accommodate these differences.

These issues were resolved with a decision to use a flag to identify foreign populations in the NIH Tracking System. This would provide flexibility in reporting aggregate data: domestic data alone, domestic and foreign data combined, or foreign data alone.

When aggregate data includes foreign participants, it is now recommended that reports contain an asterisk and footnote. The footnote should state that the data include subjects from foreign countries; therefore, it cannot be determined with complete accuracy that demographic classifications on foreign participants correspond exactly with minority classifications used for U.S. subjects.

ORWH and the NIH will also continue to meet new challenges related to the recruitment and retention of women and minorities in clinical studies, particularly with regard to expanded community outreach and legal, ethical, and social implications. Issues involving special populations of women will continue to receive attention. Finally, ORWH will work with the ICs and broader scientific communities to determine how to better facilitate sex and gender analysis of data from NIH supported research, as required by the NIH Revitalization Act of 1993, in published reports of research outcomes.

Table 1. Level of Compliance with Inclusion Policy in New Extramural Grant Applications as Assessed During Scientific Peer Review

| Council Dates |  | Jan-95 | May-95 | Aug-95 | Oct-95 | Jan-96 | May-96 | Aug-96 | Oct-96 | Jan-97 | May-97 | Aug-97 | Oct-97 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Total Number of Applications Reviewed | (\#) | 12,886 | 14,027 | 424 | 12,832 | 12,028 | 12,125 | 846 | 11,760 | 12,037 | 12,082 | 505 | 12,402 |
| Number of Applications with Human Subjects | (\#) | 5,101 | 5,359 | 162 | 5,260 | 4,521 | 4,676 | 374 | 4,653 | 4,562 | 4,704 | 271 | 4,671 |
| Number (percent) of applications approved by IRG as submitted | (\#) | 4,707 | 4,986 | 157 | 4,914 | 4,218 | 4,385 | 360 | 4,359 | 4,250 | 4,379 | 259 | 4,382 |
|  | (\%) | 92.28\% | 93.04\% | 96.91\% | 93.42\% | 93.30\% | 93.78\% | 96.26\% | 93.68\% | 93.16\% | 93.09\% | 95.57\% | 93.81\% |
| Number (percent) of applications with unacceptable minority inclusion | (\#) | 175 | 131 | 1 | 126 | 146 | 115 | 4 | 129 | 134 | 115 | 2 | 104 |
|  | (\%) | 3.43\% | 2.44\% | 0.62\% | 2.40\% | 3.23\% | 2.46\% | 1.07\% | 2.77\% | 2.94\% | 2.44\% | 0.74\% | 2.23\% |
| Number (percent) of applications with unacceptable sex/gender inclusion | (\#) | 33 | 29 | 2 | 22 | 21 | 23 | 1 | 14 | 17 | 20 | 6 | 20 |
|  | (\%) | 0.65\% | 0.54\% | 1.23\% | 0.42\% | 0.46\% | 0.49\% | 0.27\% | 0.30\% | 0.37\% | 0.43\% | 2.21\% | 0.43\% |
| Number (percent) of applications with both unacceptable minority AND | (\#) | 186 | 213 | 2 | 198 | 136 | 153 | 9 | 151 | 161 | 190 | 4 | 165 |
|  | (\%) |  |  |  |  |  |  |  |  |  |  |  |  |
| Total Number (percent) of applications with unacceptable minority inclusion | (\#) | 361 | 344 | 3 | 324 | 282 | 268 | 13 | 280 | 295 | 305 | 6 | 269 |
|  | (\%) | 7.08\% | 6.42\% | 1.85\% | 6.16\% | 6.24\% | 5.73\% | 3.48\% | 6.02\% | 6.47\% | 6.48\% | 2.21\% | 5.76\% |
| Total Number (percent) of applications with unacceptable sex/gender inclusion | (\#) | 219 | 242 | 4 | 220 | 157 | 176 | 10 | 165 | 178 | 210 | 10 | 185 |
|  | (\%) | 4.29\% | 4.52\% | 2.47\% | 4.18\% | 3.47\% | 3.76\% | 2.67\% | 3.55\% | 3.90\% | 4.46\% | 3.69\% | 3.96\% |
| Total number (percent) unacceptable applications as submitted | (\#) | 394 | 373 | 5 | 346 | 303 | 291 | 14 | 294 | 312 | 325 | 12 | 289 |
|  | (\%) | 7.72\% | 6.96\% | 3.09\% | 6.58\% | 6.70\% | 6.22\% | 3.74\% | 6.32\% | 6.84\% | 6.91\% | 4.43\% | 6.19\% |

Table 2. Extramural Competing Awards that Required the Lifting of a Bar-To-Funding

| Council Dates |  | Jan-95 | May-95 | Aug-95 | Oct-95 | Jan-96 | May-96 | Aug-96 | Oct-96 | Jan-97 | May-97 | Aug-97 | Oct-97 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Total number of awards | (\#) | 3,476 | 3,902 | 129 | 3,344 | 3,548 | 3,759 | 228 | 3,378 | 3,874 | 3,958 | 222 | 3,817 |
| Number of awards involving human subjects | (\#) | 1,287 | 1,421 | 51 | 1,263 | 1,260 | 1,352 | 92 | 1,254 | 1,394 | 1,470 | 106 | 1,401 |
| Number (percent) of awards involving human subjects that met the inclusion requirements as submitted | (\#) | 1,224 | 1,330 | 50 | 1,189 | 1,178 | 1,277 | 89 | 1,198 | 1,305 | 1,374 | 101 | 1,324 |
|  | (\%) | 95.10\% | 93.60\% | 98.04\% | 94.14\% | 93.49\% | 94.45\% | 96.74\% | 95.53\% | 93.62\% | 93.47\% | 95.28\% | 94.50\% |
| Number (percent) of awards where minority only bar-to-funding was removed by program staff (M_U) | (\#) | 29 | 26 |  | 22 | 43 | 29 | 0 | 22 | 38 | 47 | 0 | 24 |
|  | (\%) | 2.25\% | 1.83\% | 0.00\% | 1.74\% | 3.41\% | 2.14\% | 0.00\% | 1.75\% | 2.73\% | 3.20\% | 0.00\% | 1.71\% |
| Number (percent) of awards where sex/gender only bar-to-funding was removed by program staff (G_U) | (\#) | 3 | 6 |  | 3 | 3 | 3 | 0 | 3 | 8 | 5 | 4 | 10 |
|  | (\%) | 0.23\% | 0.42\% | 0.00\% | 0.24\% | 0.24\% | 0.22\% | 0.00\% | 0.24\% | 0.57\% | 0.34\% | 3.77\% | 0.71\% |
| Number (percent) of awards where both minority AND sex/gender bar-to-funding was removed by program staff | (\#) | 31 | 59 | 1 | 49 | 36 | 43 | 3 | 31 | 43 | 44 | 1 | 43 |
|  | (\%) | 2.41\% | 4.15\% | 1.96\% | 3.88\% | 2.86\% | 3.18\% | 3.26\% | 2.47\% | 3.08\% | 2.99\% | 0.94\% | 3.07\% |
| Total number (percent) of awards where minority bar-to-funding was removed by program staff | (\#) | 60 | 85 | 1 | 71 | 79 | 72 | 3 | 53 | 81 | 91 | 1 | 67 |
|  | (\%) | 4.66\% | 5.98\% | 1.96\% | 5.62\% | 6.27\% | 5.33\% | 3.26\% | 4.23\% | 5.81\% | 6.19\% | 0.94\% | 4.78\% |
| Total number (percent) of awards where sex/gender bar-to-funding was removed by program staff | (\#) | 34 | 65 | 1 | 52 | 39 | 46 | 3 | 34 | 51 | 49 | 5 | 53 |
|  | (\%) | 2.64\% | 4.57\% | 1.96\% | 4.12\% | 3.10\% | 3.40\% | 3.26\% | 2.71\% | 3.66\% | 3.33\% | 4.72\% | 3.78\% |
| Total number (percent) of awards where bar-to-funding was removed | (\#) | 63 | 91 | 1 | 74 | 82 | 75 | 3 | 56 | 89 | 96 | 5 | 77 |
|  | (\%) | 4.90\% | 6.40\% | 1.96\% | 5.86\% | 6.51\% | 5.55\% | 3.26\% | 4.47\% | 6.38\% | 6.53\% | 4.72\% | 5.50 |


| Table 3. Reasons Why Extramural Awards Required a Lifting of the Bar-to-Funding |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Council Dates | Jan-95 | May-95 | Aug-95 | Oct-95 | Jan-96 | May-96 | Aug-96 | Oct-96 | Jan-97 | May-97 | Aug-97 | Oct-97 |
| Additional information | 37 | 75 | 1 | 43 | 50 | 49 | 2 | 30 | 43 | 57 | 1 | 43 |
| Study design modification | 3 | 1 | 0 | 4 | 5 | 3 | 0 | 7 | 8 | 7 | 1 | 7 |
| Overall portfolio balance | 0 | 0 | 0 | 1 | 2 | 0 | 0 | 2 | 4 | 2 | 0 | 0 |
| Error in Initial Coding | 2 | 2 | 0 | 7 | 7 | 1 | 0 | 5 | 2 | 5 | 0 | 2 |
| Other: |  |  |  |  |  |  |  |  |  |  |  |  |
| Existing cohort | 0 | 0 | 0 | 2 | 1 | 0 | 0 | 1 | 2 | 1 | 0 | 1 |
| Unidentified tissue specimens |  |  |  | 3 | 5 | 1 | 0 | 0 | 5 | 5 | 0 | 3 |
| Cadavers | 1 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 1 |
| Specified/Noted in Comments |  | 1 | 0 | 1 | 1 | 0 | 0 | 0 | 0 | 1 | 3 | 2 |
| Records Unavailable | 7 | 4 |  | 1 | 0 | 4 | 1 | 1 | 5 | 4 | 0 | 1 |
| Total Identified Reasons | 50 | 83 | 1 | 62 | 72 | 58 | 3 | 46 | 69 | 82 | 5 | 60 |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
| *Difference in Totals | 13 | 8 | 0 | 12 | 10 | 17 | 0 | 10 | 19 | 14 | 0 | 12 |
| Total Bar-to-Funding including Fellowship Awards | 63 | 91 | 1 | 74 | 82 | 75 | 3 | 56 | 88 | 96 | 5 | 72 |
| * Information from NICHD pending. |  |  |  |  |  |  |  |  |  |  |  |  |

## Table 4A. Inclusion by Sex in All Research Studies Active in FY1994

|  | Extramural Studies |  | Intramural Studies |
| :---: | :---: | :---: | :---: |
|  | Phase III <br> trials** | Other clinical research*** | (On Site) |
| Protocols reporting women only | 96 | 192 | 121 |
| Protocols reporting men only | 14 | 96 | 130 |
| Protocols reporting both women and men | 334 | 1,566 | 492 |
| Protocols involving men, women and Unknown*** | 92 | 80 |  |
| Sex composition reported as Unknown | 9 | 26 |  |
| Protocols reporting men and Unknown | 8 | 3 |  |
| Protocols reporting women and Unknown | 10 | 2 |  |
| Early Stage studies where enrollment data has not yet been collected | 35 | 329 | 474 |
| Data Not Available | 8 | 92 | 0 |
| Totals | 606 | 2,386 | 1,217 |

[^2]**** Many studies may be generic.

Overall data is incomplete.

## Table 4B. Inclusion by Sex in All Research Studies Active in FY1995

|  | Extramural Studies |  | Intramural Studies |
| :---: | :---: | :---: | :---: |
|  | Phase III trials** | Other clinical research*** | (On Site) |
| Protocols reporting women only | 89 | 582 | 121 |
| Protocols reporting men only | 14 | 241 | 113 |
| Protocols reporting both women and men | 350 | 3,248 | 470 |
| Protocols involving men, women and Unknown**** | 105 | 310 |  |
| Sex composition reported as Unknown | 5 | 84 |  |
| Protocols reporting men and Unknown | 7 | 10 |  |
| Protocols reporting women and Unknown | 9 | 18 |  |
| Early Stage studies where enrollment data has not yet been collected | 39 | 1,404 | 513 |
| Data Not Available | 12 | 335 | 0 |
| Totals | 630 | 6,232 | 1,217 |

** According to the NIH Guidelines on the Inclusion of Women and Minorities as Subjects in Clinical Research, Phase III clinical investigations usually involve several hundred or more human subjects, for the purpose of evaluating an experimental intervention in comparison with standard or control intervention or comparing two or more existing treatments.
*** Human subject studies that are not Phase III clinical trials.
**** Many studies may be generic.

## Table 4C. Inclusion by Sex in All Research Studies Active in FY1996

|  | Extramural Studies |  | Intramural Studies |
| :---: | :---: | :---: | :---: |
|  | Phase III trials** | Other clinical research*** | On-site |
| Protocols reporting women only | 29 | 603 | 118 |
| Protocols reporting men only | 10 | 182 | 123 |
| Protocols reporting both women and men | 166 | 3,406 | 457 |
| Protocols involving men, women and Unknown**** | 14 | 245 |  |
| Sex composition reported as Unknown | 0 | 72 |  |
| Protocols reporting men and Unknown | 0 | 5 |  |
| Protocols reporting women and Unknown | 1 | 12 |  |
| Early Stage studies where enrollment data has not yet been collected | 58 | 1,307 | 393 |
| Data Not Available | 11 | 235 | 0 |
| Totals | 289 | 6,067 | 1,091 |

** According to the NIH Guidelines on the Inclusion of Women and Minorities as Subjects in Clinical Research, Phase III clinical investigations usually involve several hundred or more human subjects, for the purpose of evaluating an experimental intervention in comparison with standard or control intervention or comparing two or more existing treatments.
*** Human subject studies that are not Phase III clinical trials.
**** Many studies may be generic.

## Table 4D. Inclusion by Sex in All Research Studies Funded in FY1997*

|  | Extramural Studies |  | Intramural Studies |
| :---: | :---: | :---: | :---: |
|  | Phase III <br> trials** | Other clinical research*** | On-site |
| Protocols reporting women only | 45 | 689 | 98 |
| Protocols reporting men only | 7 | 232 | 92 |
| Protocols reporting both women and men | 181 | 3,606 | 450 |
| Protocols involving men, women and Unknown**** | 8 | 209 |  |
| Sex composition reported as Unknown | 5 | 65 |  |
| Protocols reporting men and Unknown | 1 | 3 |  |
| Protocols reporting women and Unknown | 0 | 3 |  |
| Early Stage studies where enrollment data has not yet been collected | 51 | 1,295 | 446 |
| Data Not Available | 18 | 264 | 0 |
| Totals | 316 | 6,366 | 1,086 |

*Note change in data collection for FY1997 to include research studies funded in FY97.
** According to the NIH Guidelines on the Inclusion of Women and Minorities as Subjects in Clinical Research, Phase III clinical investigations usually involve several hundred or more human subjects, for the purpose of evaluating an experimental intervention in comparison with standard or control intervention or comparing two or more existing treatments.
*** Human subject studies that are not Phase III clinical trials.
**** Many studies may be generic.

## Examples of Studies of Selected Protocols that include Male-Only Human Subjects

Nutritional and Hormonal Biomarkers in Prostate Cancer
Testosterone and Bone Mineral Density in Elderly Men
Bone Loss in Vertebral Fractures in Older Men
Head Injury \& Alzheimer's Disease
Genetic Epidemiology of Alzheimer's Disease in Twins
Epidemiology of Male Infertility - Cryptorchidism
Medical Therapy for BPH - Data Coordinating Center
HIV Prevention Intervention for Young Men
Dietary Etiologies of Heart Disease and Cancer
Managing Uncertainty in Stage B Prostate Cancer
Comprehensive HBP Care for Young Urban Black Men
Follow-up Study of Neurological Risks in Amateur Boxers
Serum Albumin, Orthostatic Hypotension in Frail Old Men
GU Sites in Men
Psychophysiology of Visible and Invisible Trauma

## Examples of Studies of Selected Protocols that include Female-Only Human Subjects

Breast Cancer Surveillance in a Defined Population
Osteoporotic Fractures
Women's Health and Aging Study
Cesarean Section Reduction in Primigravid Patients
Diet, Activity and Adolescent Weight Changes
Alternative Interventions for Battered Women
Trial of Vitamin E, Beta-Carotene and Aspirin in Women
Genetic Epidemiology of Blood Lipids and Obesity
Endogenous Estrogen \& Coronary Heart Disease in Women
Women's Health Initiative
Risk Factors for Cardiovascular Disease in Women
Cross Ethnic Nursing Study of Weight Management in Women
Women's Estrogen for Stroke Trial (West)
Detection of Presymptomatic Alzheimer's Disease by FMRI
Women's Estrogen for Stroke Trial
Diagnosis of Perinatal HIV Infection in Puerto Rico
Persistence or Transience of HPV Infection in Women
Urine Screening Test to Detect Bacteruiuria in Pregnancy
Women's Interagency HIV Study
Connective Tissue Role in Urinary Stress Incontinence
Infant Mortality in Rural Yunnan, China

## Table 97A. Aggregate Enrollment Data for All Extramural Research Protocols Funded in FY1997

|  | American Indians and Alaska Natives |  | Asian and Pacific Islanders |  | Black - Not Hispanic |  | Hispanic |  | White - Not Hispanic |  | Other and Unknown |  | Total |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% | \# | \% | \# | \% | \# | \% | \# | \% | \# | \% | \# | \% |
| Female | 42,502 | 1.1\% | 577,432 | 15.4\% | 647,444 | 17.2\% | 290,735 | 7.7\% | 1,980,881 | 52.7\% | 220,332 | 5.9\% | 3,759,326 | 61.9\% |
| Male | 28,072 | 2.9\% | 292,246 | 12.9\% | 384,330 | 17.0\% | 195,618 | 8.7\% | 1,212,955 | 53.7\% | 144,418 | 6.4\% | 2,257,639 | 37.1\% |
| Unknown | 432 | 0.7\% | 1,185 | 1.9\% | 3,533 | 5.8\% | 3,945 | 6.5\% | 20,157 | 33.0\% | 31,882 | 52.2\% | 61,134 | 1.0\% |
| Total | 71,006 | 1.6\% | 870,863 | 14.3\% | 1,035,307 | 17.0\% | 490,298 | 8.1\% | 3,213,993 | 52.9\% | 396,632 | 6.5\% | 6,078,099 | 100.0\% |

Number of Protocols: 6,799

Comments:
More females ( $3,759,326$ or $61.9 \%$ ) than males ( $2,257,326$ or $37.1 \%$ ) are enrolled in aggregate Extramural Research protocols.
Largest identified racial group is White, non-Hispanic at $52.9 \%$.
Largest identified racial minority group is Black, non-Hispanic at $17 \%$.
Smallest identified racial minority group is American Indian/Alaskan Natives at 1.6\%.

| Aggregate Enrollment Data for Extramural Research Protocols Funded in FY 1997 |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Table 97B. Distribution of Participants (Numbers) |  |  |  |  |  |  |  |
|  | American <br> Indians and Alaska Natives | Asian and Pacific Islanders | Black - Not Hispanic | Hispanic | White - Not Hispanic | Other and Unknown | Total |
| Female | 42,502 | 577,432 | 647,444 | 290,735 | 1,980,881 | 220,332 | 3,759,326 |
| Male | 28,072 | 292,246 | 384,330 | 195,618 | 1,212,955 | 144,418 | 2,257,639 |
| Unknown | 432 | 1,185 | 3,533 | 3,945 | 20,157 | 31,882 | 61,134 |
| Total | 71,006 | 870,863 | 1,035,307 | 490,298 | 3,213,993 | 396,632 | 6,078,099 |
| Table 97C. Distribution of Participants (Percentage) |  |  |  |  |  |  |  |
|  | American Indians and Alaska Natives | Asian and Pacific Islanders | Black - Not <br> Hispanic | Hispanic | White - Not Hispanic | Other and Unknown | Total |
| Female | 1.1\% | 15.4\% | 17.2\% | 7.7\% | 52.7\% | 5.9\% | 61.9\% |
| Male | 1.2\% | 12.9\% | 17.0\% | 8.7\% | 53.7\% | 6.4\% | 37.1\% |
| Unknown | 0.7\% | 1.9\% | 5.8\% | 6.5\% | 33.0\% | 52.2\% | 1.0\% |
| Total | 1.2\% | 14.3\% | 17.0\% | 8.1\% | 52.9\% | 6.5\% | 100.0\% |

Table 97D. Aggregate Enrollment Data for Extramural Phase III Protocols Funded in FY1997

|  | American and A Nati | dians <br> ka | Asian an Islan | $\begin{aligned} & \text { acific } \\ & \hline \end{aligned}$ | Black Hisp | Not ic | Hisp |  | White Hisp | Not nic | Othe <br> Unkn |  | To |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% | \# | \% | \# | \% | \# | \% | \# | \% | \# | \% | \# | \% |
| Female | 2,902 | 1.3\% | 4,490 | 2.0\% | 26,402 | 11.6\% | 10,013 | 4.4\% | 181,603 | 79.5\% | 3,007 | 1.3\% | 228,417 | 74.8\% |
| Male | 2,127 | 2.9\% | 834 | 1.1\% | 16,256 | 21.9\% | 6,423 | 8.6\% | 47,829 | 64.3\% | 920 | 1.2\% | 74,389 | 24.3\% |
| Unknown | 1 | 0.0\% | 0 | 0.0\% | 147 | 5.4\% | 4 | 0.1\% | 102 | 3.8\% | 2,451 | 90.6\% | 2,705 | 0.9\% |
| Total | 5,030 | 1.6\% | 5,324 | 1.7\% | 42,805 | 14.0\% | 16,440 | 5.4\% | 229,534 | 75.1\% | 6,378 | 2.1\% | 305,511 | 100.0\% |
| Number of Protocols : 320 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |

Comments:
Substantial numbers of women and minorities were enrolled in Phase III research protocols funded in 1997.
There were more females ( 228,417 or $74.8 \%$ ) than males $(74,389$ or $24.3 \%)$ enrolled in Phase III research protocols.
Among minority subjects, the largest racial minority group is Black, non-Hispanic at 42,805 or $14.0 \%$.
Smallest identified racial group is American Indian/Alaska Natives at 5,030 or 1.6\%.

| Aggregate Enrollment Data for Extramural Phase III Protocols Funded in FY1997 |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Table 97E. Distribution of Participants (Numbers) |  |  |  |  |  |  |  |
|  | American Indians and Alaska Natives | Asian and Pacific Islander | Black - Not Hispanic | Hispanic | White - Not Hispanic | Other and Unknown | Total |
| Female | 2,902 | 4,490 | 26,402 | 10,013 | 181,603 | 3,007 | 228,417 |
| Male | 2,127 | 834 | 16,256 | 6,423 | 47,829 | 920 | 74,389 |
| Unknown | 1 | 0 | 147 | 4 | 102 | 2,451 | 2,705 |
| Total | 5,030 | 5,324 | 42,805 | 16,440 | 229,534 | 6,378 | 305,511 |
| Table 97F. Distribution of Participants (Percentage) |  |  |  |  |  |  |  |
|  | American Indians and Alaska Natives | Asian and Pacific Islanders | Black - Not Hispanic | Hispanic | White - Not Hispanic | Other and Unknown | Total |
| Female | 1.3\% | 2.0\% | 11.6\% | 4.4\% | 79.5\% | 1.3\% | 74.8\% |
| Male | 2.9\% | 1.1\% | 21.9\% | 8.6\% | 64.3\% | 1.2\% | 24.3\% |
| Unknown | 0.0\% | 0.0\% | 5.4\% | 0.1\% | 3.8\% | 90.6\% | 0.9\% |
| Total | 1.6\% | 1.7\% | 14.0\% | 5.4\% | 75.1\% | 2.1\% | 100.0\% |

## Table 97G. Aggregate Enrollment Data for Intramural Research Protocols Conducted at the Warren G. Magnuson Clinical Center Funded in FY1997

|  | American Indians and Alaska Natives |  | Asian and Pacific Islanders |  | Black - Not Hispanic |  | Hispanic |  | White - Not Hispanic |  | Other and Unknown |  | Total |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% | \# | \% | \# | \% | \# | \% | \# | \% | \# | \% | \# | \% |
| Female | 8 | 0.1\% | 309 | 4.3\% | 887 | 12.4\% | 257 | 3.6\% | 5,578 | 78.2\% | 97 | 1.4\% | 7,136 | 49.6\% |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Male | 13 | 0.2\% | 308 | 4.2\% | 699 | 9.6\% | 207 | 2.9\% | 5,954 | 82.1\% | 73 | 1.0\% | 7,254 | 50.4\% |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Unknown | 0 | 0.0\% | 0 | 0.0\% | 0 | 0.0\% | 0 | 0.0\% | 0 | 0.0\% | 0 | 0.0\% | 0 | 0.0\% |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Total | 21 | 0.1\% | 617 | 4.3\% | 1,586 | 11.0\% | 464 | 3.2\% | 11,532 | 80.1\% | 170 | 1.2\% | 14,390 | 100.0\% |

Number of Protocols: 642

Comments:
Women and men have about equal participation in aggregate Intramural Research protocols.
Largest identified racial group is White, Not-Hispanic at 11,532 or $80.1 \%$.
Largest identified racial minority group is Black, Not-Hispanic at 1,586 or $11.0 \%$.
Smallest identified racial minority group is American Indian/Alaska Native at 21 or $0.1 \%$.
Clinical Center is engaged in outreach to minority groups to encourage participation.

| Aggregate Enrollment Data for Intramural Research Protocols Conducted at the Warren G. Magnuson Clinical Center Funded in FY1997 |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Table 97H. Distribution of Participants (Number) |  |  |  |  |  |  |  |
|  | American <br> Indians and <br> Alaska <br> Natives | Asian and Pacific Islanders | Black - Not Hispanic | Hispanic | White - Not Hispanic | Other and Unknown | Total |
| Female | 8 | 309 | 887 | 257 | 5,578 | 97 | 7,136 |
| Male | 13 | 308 | 699 | 207 | 5,954 | 73 | 7,254 |
| Unknown | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 21 | 617 | 1,586 | 464 | 11,532 | 170 | 14,390 |

Table 97I. Distribution of Participants (Percentage)

|  | American Indians and Alaska Natives | Asian and Pacific Islanders | Black - Not <br> Hispanic | Hispanic | White - Not Hispanic | Other and Unknown | Total |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Female | 0.1\% | 4.3\% | 12.4\% | 3.6\% | 78.2\% | 1.4\% | 49.6\% |
| Male | 0.2\% | 4.2\% | 9.6\% | 2.9\% | 82.1\% | 1.0\% | 50.4\% |
| Unknown | 0.0\% | 0.0\% | 0.0\% | 0.0\% | 0.0\% | 0.0\% | 0.0\% |
| Total | 0.1\% | 4.3\% | 11.0\% | $3.2 \%$ | 80.1\% | 1.2\% | 100.0\% |

## Table 97J. Aggregate Enrollment Data for Intramural Research Protocols Conducted Off-Site in FY 1997

|  | American Indians <br> and Alaska <br> Natives | Asian and Pacific <br> Islanders |  | Black - Not <br> Hispanic |  | Hispanic |  | White - Not <br> Hispanic |  | Other and <br> Unknown |  | Total |  |
| :--- | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |

Total Number of Protocols: 161
Comments:
More females (479,668 or 48.6\%) than males (451,987 or 45.8\%) in aggregate Intramural Research Protocols
Among the minority groups, the largest identified racial group is Asian/Pacific Islander at 365,550 or $37.1 \%$.
More males ( 10,481 or $2.32 \%$ ) than females ( 8,637 or $1.80 \%$ ) have not identified a racial group.
Smallest identified racial group is Hispanic at 13,695 or $1.39 \%$.

## Aggregate Enrollment Data for Intramural Research Protocols Conducted Off-Site in FY1997

Table 97K. Distribution of Participants (Number)

|  | American Indians and Alaska Natives | Asian and Pacific Islanders | Black - Not Hispanic | Hispanic | White - Not Hispanic | Other and Unknown | Total |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Female | 1,579 | 186,222 | 29,354 | 5,737 | 248,139 | 8,637 | 479,668 |
| Male | 1,508 | 178,514 | 15,343 | 6,527 | 239,614 | 10,481 | 451,987 |
| Unknown | 11,843 | 814 | 14,628 | 1,431 | 481 | 25,235 | 54,432 |
| Total | 14,930 | 365,550 | 59,325 | 13,695 | 488,234 | 44,353 | 986,087 |

Table 97L. Distribution of Participants (Percentage)

|  | American Indians and Alaska Natives | Asian and Pacific Islanders | Black - Not Hispanic | Hispanic | White - Not Hispanic | Other and Unknown | Total |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Female | 0.33\% | 38.82\% | 6.12\% | 1.20\% | 51.73\% | 1.80\% | 48.64\% |
| Male | 0.33\% | 39.50\% | 3.39\% | 1.44\% | 53.01\% | 2.32\% | 45.84\% |
| Unknown | 21.76\% | 1.50\% | 26.87\% | 2.63\% | 0.88\% | 46.36\% | 5.52\% |
| Total | 1.51\% | 37.07\% | 6.02\% | 1.39\% | 49.51\% | 4.50\% | 100.00\% |

## Additional General Accounting Office (GAO) Report Tables

## GAO Report Table 1

| Aggregate Enrollment for <br> NIH Extramural and Intramural Research <br> FY1997 (By Percentage) |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- |
| Gender | Extramural |  | Intramural |  |
|  | All | Phase III <br> Only | On-site | Off-Site |
| Female | $61.9 \%$ | $74.8 \%$ | $49.6 \%$ | $50.0 \%$ |
| Male | $37.1 \%$ | $24.3 \%$ | $50.4 \%$ | $39.9 \%$ |
| Unknown | $1.0 \%$ | $0.9 \%$ | $0.0 \%$ | $10.1 \%$ |

## GAO Report Table 2

| Aggregate Enrollment for NIH Extramural Research Excluding Male-Only \& Female-only Protocols FY 1997 (By Percentage) |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | American Indians and Alaska Natives | Asian and <br> Pacific <br> Islanders | Black - <br> Not <br> Hispanic | Hispanic | White - <br> Not <br> Hispanic | Other and Unknown | Total |
| Female | 1.6\% | 9.6\% | 20.8\% | 10.5\% | 51.6\% | 5.9\% | 52.1\% |
| Male | 1.3\% | 12.5\% | 17.2\% | 8.9\% | 53.7\% | 6.4\% | 46.6\% |
| Unknown | 0.7\% | 1.9\% | 5.8\% | 6.5\% | 33.0\% | 52.2\% | 1.3\% |

## GAO Report Table 3

| Aggregate Enrollment of FEMALE MINORITIES in NIH Extramural and Intramural Research FY 1997 (By Percentage) |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | American Indians and Alaska Natives | Asian and <br> Pacific <br> Islanders | Black - <br> Not <br> Hispanic | Hispanic | White - <br> Not <br> Hispanic | Other and Unknown | Total |
| All Extramural | 1.1\% | 15.4\% | 17.2\% | 7.7\% | 52.7\% | 5.9\% | 61.9\% |
| Phase III Extramural | 1.3\% | 2.0\% | 11.6\% | 4.4\% | 79.5\% | 1.3\% | 74.8\% |
| On-Site Intramural | 0.1\% | 4.3\% | 12.4\% | 3.6\% | 78.2\% | 1.4\% | 49.6\% |
| Off-Site Intramural | 0.2\% | 55.3\% | 3.8\% | 0.5\% | 38.4\% | 1.8\% | 50.0\% |

* Based on special request from the May 2000 GAO Report.


## Appendix A

## Explanation of Sex and Minority Codes

| G1A | Includes both genders, scientifically acceptable. |
| :--- | :--- |
| G2A | Includes only women, scientifically acceptable. |
| G3A | Includes only men, scientifically acceptable. |
| G4A | Gender representation unknown, scientifically acceptable. |
| G1U | Includes both genders, but scientifically unacceptable. |
| G2U | Includes only women, scientifically unacceptable. |
| G3U | Includes only men, scientifically unacceptable. |
| G4U | Gender representation unknown, scientifically unacceptable. |


| M1A | Includes minorities and non-minorities, scientifically acceptable. |
| :--- | :--- |
| M2A | Includes only minorities, scientifically acceptable. |
| M3A | Includes only non-minorities, scientifically acceptable. |
| M4A | Minority representation unknown, scientifically acceptable. |
|  |  |
| M1U | Includes minorities and non-minorities, but scientifically unacceptable. |
| M2U | Includes only minorities, scientifically unacceptable. |
| M3U | Includes only non-minorities, scientifically unacceptable. |
| M4U | Minority representation unknown, scientifically unacceptable. |

When an application receives a " $U$ " (unacceptable) code it automatically receives a bar-to-funding. If the bar is removed, the " $U$ " is converted to " $R$ " to designate that change in status.

## Appendix B

## NIH Tracking and Inclusion Committee Members

| IC | Members |
| :--- | :--- |
| NCI | Diane Bronzert, Jane Cassidy, Otis Brawley, Marilyn Gaston, Karen Bashir, George Alexander, <br> Marvin Kalt |
| NCRR | Dolores Lee, Barbara Perrone, Louise Ramm, Jan Heffernan, Geoff Cheung |
| NEI | Jack McLaughlin, Lore Ann McNicol |
| NHGRI | Monique Mansoura |
| NHLBI | Carl Roth, Sharry Palagi, Barbara Liu, Ralph Van Wey, Bill Wagner, Janita Coen |
| NIA | Miriam Kelty, David Reiter |
| NIAAA | Anne Phillips, Carmen Richardson, Nancy Brennan |
| NIAID | Joan Kondratick, Diane Yerg, Lai Tan, Milton Hernandez, Susan Marshall |
| NIAMS | Joanne Odenkirchen, Julia Freeman |
| NICHD | Darlene Levenson, Douglas Shawver, Yvonne Maddox |
| NIDA | Jack Manischewitz, Mark Sweiter |
| NIDCD | Julie Gulya, Lynnette Hemsley, Beth Ansel, Susa Hamilton |
| NIDDK | Walter Stolz, Beth Paterson |
| NIDCR | Norman Braveman, Patricia Bryant |
| NIEHS | Martha Barnes |
| NIGMS | Alison Cole, Marcia Hahn |
| NIMH | Mary Blehar, Sherman Ragland, Charles Havekost |
| NINDS | Mary Graham, Constance Atwell, Mary Ellen Cheung, Mark Hallet |
| NINR | Carole Hudgings, Robin Gruber |
| NLM | Dwight Mowery, John Seachrist |
| FIC | Kathleen Michels |
| CC | Jerry King, Kai Lakeman |
| OIR | Alan Sandler, Deloris Mills |
| ORWH | Vivian Pinn, Virginia Hartmuller, Angela Bates |


[^0]:    ${ }^{1}$ Racial and ethnic categories are in accord with the Office of Management and Budget (OMB) Directive No. 15.

[^1]:    ${ }^{2}$ Copies of certifications are available in the Office of the Director, NIH and the Office of Research on Women's Health.

[^2]:    ** According to the NIH Guidelines on the Inclusion of Women and Minorities as Subjects in Clinical Research, Phase III clinical investigations usually involve several hundred or more human subjects, for the purpose of evaluating an experimental intervention in comparison with standard or control intervention or comparing two or more existing treatments.
    *** Human subject studies that are not Phase III clinical trials.

