

## Expert Feedback on NIH/AHRQ Rigor and Transparency Guidelines



## Tufts CTSI Overview

- Tufts Clinical and Translational Science Institute (Tufts CTSI) was established in 2008 with a Clinical and Translational Science Award (CTSA)
  - Part of a consortium of more than 60 national CTSA
  - **Research services** institutes “working together to speed the translation of research discovery into improved patient care.”
  - Funded by the NIH



## Tufts CTSI’s Mission & Purpose

Established in 2008 to translate research into better health



- Stimulate and expedite innovative clinical and translational research, with the goal of improving the public’s health
- *Entire spectrum* of clinical and translational research is critical to meeting the promise and the public’s needs of biomedical science



## 39 Tufts CTSI Partners

**13 Tufts Schools & Centers**  
 Cummings School of Veterinary Medicine  
 Fletcher School of Law & Diplomacy  
 Friedman School of Nutrition Science & Policy  
 Graduate School of Arts & Sciences  
 Institute for Clinical Research & Health Policy Studies at Tufts Medical Center  
 Jean Mayer USDA Human Nutrition Research Center on Aging  
 Sackler School of Graduate Biomedical Sciences  
 School of Dental Medicine  
 School of Engineering  
 School of Medicine  
 Tisch College of Citizenship & Public Service  
 Tufts Center for the Study of Drug Development  
 Tufts Innovation Institute

**3 Academic Partners**  
 Brandeis University  
 Northeastern University  
 RAND Corporation

**7 Tufts-Affiliated Hospitals**  
 Baystate Medical Center  
 Lahey Clinic  
 Maine Medical Center  
 New England Baptist Hospital  
 Newton-Wellesley Hospital  
 St. Elizabeth’s Medical Center  
 Tufts Medical Center

**6 Industry/Non-Profit Partners**  
 Blue Cross Blue Shield of Massachusetts  
 Eli Lilly and Company  
 Institute for Systems Biology and P4 Medicine Institute  
 Minuteman Health Network  
 Pfizer, Inc.  
 Tufts Health Plan



**10 Community-Based Partners**  
 Action for Boston Community Development (ABCD)  
 Asian Community Development Corporation  
 Asian Task Force Against Domestic Violence  
 Asian Women for Health  
 Boston Chinatown Neighborhood Center  
 Center for Information and Study on Clinical Research Participation  
 Greater Boston Chinese Golden Age Center  
 Health Resources in Action  
 Museum of Science, Boston  
 New England Quality Care Alliance

## How Can CTSI Help?

- **Connections** with other researchers, industry, the community, and policy-makers across the Tufts CTSI network and national CTSA consortium via our **Navigators & Research Collaboration team**.
- **Consultations** on **comparative effectiveness, one health, research process improvement** and **stakeholder and community engagement** projects and grants, as well as **regulatory issues** and other areas of translation.
- **Study design and data analysis** (pre- and post-award) through the **Biostatistics, Epidemiology, and Research Design (BERD) Center**, including drop-in sessions.



## How Can CTSI Help?

- **24/7 clinical trial support** through our **Clinical and Translational Research Center (CTRC)**.
- **Informatics tools** for electronic data capture (**REDCap**), resource sharing, and collaboration.
- **Training & professional development** including MS and PhD degrees, certificate programs, seminars & workshops, and **paid career development awards and fellowships**.
- **Funding** through one-year interdisciplinary **pilot studies grants** that support the initial stages of research.



## How to Request Tufts CTSI Services

- Visit [www.tuftsctsi.org](http://www.tuftsctsi.org) and submit a request







## Summary of the NIH/AHRQ Rigor and Transparency Guidelines

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**Amy Gantt, MA**  
 Director, Office of Research Development  
 Tufts University  
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### This session will provide:

- Summary of changes to proposal content for the National Institutes of Health (NIH) and Agency for Healthcare Research and Quality (AHRQ)





### Resources Describing Changes

- Summary of all changes, with links for additional information  
<http://grants.nih.gov/reproducibility/index.htm>
- FAQs for each element of Rigor & Reproducibility  
<http://grants.nih.gov/reproducibility/faqs.htm>
- Dr. Mike Lauer's blog. Several entries describe NIH's expectations  
<http://nexus.od.nih.gov/all/category/blog/>
- Reviewer guidance on Rigor and Transparency  
[http://grants.nih.gov/grants/peer/guidelines\\_general/Reviewer\\_Guidance\\_on\\_Rigor\\_and\\_Transparency.pdf](http://grants.nih.gov/grants/peer/guidelines_general/Reviewer_Guidance_on_Rigor_and_Transparency.pdf)





### Summary of Rigor & Transparency Requirements

ELEMENT	SECTION OF APPLICATION	DEFINITION	OVERALL SCORE?
Scientific Premise	Significance	The general strengths & weaknesses of the prior research as crucial to support the application	Yes
Scientific Rigor	Approach	Application of the scientific method to ensure robust & unbiased study design, methods, analysis, interpretation & reporting of results	Yes
Consideration of Relevant Biological Variables	Approach	Sex as a biological variable, as well as other variables, will be factored into research designs, analyses, & reporting in vertebrate animal & human studies	Yes
Authentication of Key Resources	Attachment	Transparently reporting on what has been done to authenticate key resources that vary over time	No

### Rigor & Transparency Scientific Premise

**Scientific Premise** should be addressed in the Significance section

- Significance = Background + Justification**
  - Review of relevant literature that makes an argument for why your work is needed
  - Tie to I/C mission (or RFA description)
  - Do not "kitchen sink" this section!* It should be a focused, coherent and – above all – an engaging justification of your work





## Rigor & Transparency Scientific Premise

### Evaluate the Scientific Literature

- Discuss the strengths, weaknesses and limitations of the studies presented in the scientific literature related to your proposed research
- *This provides the foundation for the justification of your work*
  - If you are not required to provide preliminary data (e.g., R21), this assessment of the literature is critical



## Rigor & Transparency Rigorous & Unbiased Approach

### Have the investigators presented strategies to ensure a robust and unbiased approach?

- **The Approach is the most important section of your proposal for scoring purposes**
  - Spend most of the space in the research strategy describing and justifying your approach



## Rigor & Transparency Rigorous & Unbiased Approach

### *Scientific Rigor* should be discussed in the Approach section

- **Describe your approach clearly and completely!**
  - Justify your methods, using preliminary data, the scientific literature, or other credible sources
  - “We will use the methods devised by Jones, et al. (2015)” is not sufficient
  - Remember that reviewers will not necessarily be experts – write for those outside your (sub) field



## Rigor & Transparency Rigorous & Unbiased Approach

- **Expected Outcomes**
  - Demonstrate that your research will have an impact on your field (and on public health) regardless of whether your hypotheses are accepted or rejected
- **Statistical Analyses**
  - Beware of perceived “p-hacking”
  - If possible and appropriate, add a biomedical statistician to your proposal to ensure that all analyses are unbiased
  - You can receive assistance through the CTSI on study design and analysis!



## Rigor & Transparency Rigorous & Unbiased Approach

### Innovation vs. Scientific Rigor

- Identify and manage the risk associated with innovative research
  - Consider the scientific premise
  - Identify the factors that are unknown
  - Incorporate strategies to reduce bias and ensure the methods are designed to generate robust results appropriate for the stage of research
- Regardless of stage of research, results should be reproducible and provide a foundation for future studies



## Rigor & Transparency Relevant Biological Variables

### Have the investigators presented adequate plans to address relevant biological variables, such as sex, for studies in vertebrate animals or human subjects?

- **In the Approach section, include a subheading for human subjects or vertebrate animals**
  - In this section, describe the population you will be using, and why you chose this particular population
  - Ask yourself why you have chosen particular inclusion/exclusion criteria (human subjects) or animal model and explain to the reviewers why your choices are necessary
  - Discuss with the Program Officer if vertebrate animal research must focus only on one sex or other biological variable (e.g., race, age, etc.) unless the reason is obvious



### Rigor & Transparency

#### Key Biological and/or Chemical Resources

Reviewers will comment on the brief plans proposed for identifying and ensuring the validity of key biological and/or chemical resources.

- This plan is a separate attachment
  - Included are cell lines, specialty chemicals, antibodies, and other biologics (among others)
  - NOT included are standard laboratory reagents that are not expected to vary (e.g., buffers and other common biologicals and reagents)
- Focus **only** on plans to authenticate or validate resources – **do not use this section to circumvent page limits!**
- For more information, please see FAQs: <http://grants.nih.gov/reproducibility/faqs.htm#11438>



# Thank you!



## NIH Study Section Chair Perspective and Advice

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**John Castellot, PhD**  
 NIH Study Section Chair  
 Navigator  
 Tufts Clinical and Translational Science Institute (CTSI)  
 Professor of Integrative Physiology & Pathobiology  
 Tufts University School of Medicine



### Resources Describing Changes

- Summary of all changes, with links for additional information  
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- Dr. Mike Lauer's blog. Several entries describe NIH's expectations  
<http://hexus.od.nih.gov/all/category/blog/>
- Reviewer guidance on Rigor and Transparency  
[http://grants.nih.gov/grants/peer/guidelines\\_general/Reviewer\\_Guidance\\_on\\_Rigor\\_and\\_Transparency.pdf](http://grants.nih.gov/grants/peer/guidelines_general/Reviewer_Guidance_on_Rigor_and_Transparency.pdf)



### Additional Resource

or, Why We Need Rigor  
 or, Sometimes the Truth Makes Us Wince

<https://www.youtube.com/watch?v=0Rnq1NpHdmw&sns=em>



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**Scientific Premise** should be addressed in the Significance section

- Significance = Background + Justification
  - Review of relevant literature that makes an argument for why your work is needed
  - Tie to I/C mission (or RFA description)
  - Do not "kitchen sink" this section!* It should be a focused, coherent and – above all – an engaging justification of your work

Think of the Scientific Premise as the *scientific foundation* for the proposed work, including both published literature and your preliminary data; it is not the hypothesis

**Grantsmanship:** Make it easy for the reviewers to see you've followed the new rules . . . Instead of having a section entitled *Rationale*, call it *Scientific Premise*

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**Grantsmanship:** Make it easy for the reviewers and include a short paragraph at the end of each Aim entitled *Scientific Rigor* that emphasizes your:

- Hypothesis-neutral (ie, unbiased) approaches
- Careful attention to positive and negative controls
- Use of independent corroboration of key results

## Rigor & Transparency Rigorous & Unbiased Approach

- Expected Outcomes**
  - Demonstrate that your research will have an impact on your field (and on public health) regardless of whether your hypotheses are accepted or rejected
- Statistical Analyses**
  - Beware of perceived "p-hacking"
    - If appropriate, add a biomedical statistician to your proposal to ensure that all analyses are unbiased
    - Power analyses for animal use must now go in the Research Plan, not the Vertebrate Animals section
    - You can receive assistance through the CTSI on study design and analysis—more on this from Norma Terrin, PhD

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  - In this section, describe the population you will be using, and why you chose this particular population
  - Ask yourself why you have chosen particular inclusion/exclusion criteria (human subjects) or animal model and explain to the reviewers why your choices are necessary
  - Discuss with the Program Officer if vertebrate animal research must focus only on one sex or other biological variable (e.g., race, age, etc.) unless the reason is obvious
- Age, race, ethnicity, culture, and socioeconomic status** are all potentially important biological variables
- Grantsmanship:** Provide a short paragraph entitled *Sex and Other Biological Variables* in the Approach section. If there are no important biological variables, state this explicitly. If there are, either state that you include them in your proposed studies or provide a succinct justification for not including them (this is where talking with you PO is important)

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**Grantsmanship:** This item is *not scorable*, so concentrate on the other score-driving R+T items first if you have a **July 5 deadline!**

## Panel Discussion



### Panelists

- **Pilar Alcaide, PhD, MS**  
Assistant Professor  
Integrative Physiology and Pathobiology  
Tufts University School of Medicine
- **Caroline Attardo Genco, PhD**  
Arthur E. Spiller, MD  
Professor and Chair,  
Integrative Physiology and Pathobiology  
Tufts University School of Medicine



### Panelists

- **Iris Jaffe, MD, PhD**  
Associate Professor of Medicine  
Tufts University School of Medicine  
Associate Director, Molecular Cardiology Research Institute  
Tufts Medical Center  
Director, Vascular Biology Research Center  
Faculty, Cell, Molecular, and Developmental Biology Program
- **Daniel Jay, PhD**  
Professor  
Developmental, Molecular and Chemical Biology  
Tufts University School of Medicine



### Department of Labor (DoL) Fair Labor Standards Act (FLSA) Overtime Rule and Research



## Presenters

**Marcia S. Izzi, MPH**  
Business Finance Manager  
Tufts Clinical and Translational Science Institute (CTSI)

**Carol Seidel, BS**  
Director, Administration and Finance  
Institute for Clinical Research and Health Policy Studies  
(ICRHPS)  
Tufts Medical Center



## Department of Labor (DoL) Fair Labor Standards Act (FLSA) Overtime Rule and Research

**Topic:** On May 18th, DoL published its final rule on overtime pay protections under the FLSA raising the salary threshold for overtime pay to \$47,476 effective December 1, 2016.

**What is the FLSA?** The FLSA establishes minimum wage, overtime pay requirements and other pay related issues for eligible employers.



## Department of Labor (DoL) Fair Labor Standards Act (FLSA) Overtime Rule and Research

### How does the new rule impact Research?

- Anyone working in a qualifying **salaried** position at an annual rate of less than \$47,476 or \$913/wk must earn overtime > 40 hours
- This includes post-docs and salaried research staff
- Current non-exempt or hourly employees are not impacted by the new rule



## Department of Labor (DoL) Fair Labor Standards Act (FLSA) Overtime Rule and Research

### How is NIH responding?

- NIH Director Collins has stated that NRSA grants and stipend levels will be adjusted and additional funds will be awarded.
- NIH recognizes that non-NRSA RPG's fund post-docs and salaried staff who are currently below the new minimum and additional funds for these programs have not been offered at this time, yet salary levels will need to be adjusted or overtime will have to be paid for hours worked over 40 in any given week as of 12/1/2016.



## Department of Labor (DoL) Fair Labor Standards Act (FLSA) Overtime Rule and Research

### How should researchers approach budgeting for grant applications?

- Researchers can consider budgeting post-docs and other salaried staff at the new minimum annual salary of \$47,476.

### What are other institutions doing about this?

- Institutions are relying on their Human Resource Departments for guidance. Questions should be directed to your Research and/or Department Administrator.



## Department of Labor (DoL) Fair Labor Standards Act (FLSA) Overtime Rule and Research

### Additional Information

**NIH Director Announcement** in Huffington Post  
[http://www.huffingtonpost.com/francis-s-collins-md-phd/fair-pay-for-postdocs-why\\_b\\_10011066.html](http://www.huffingtonpost.com/francis-s-collins-md-phd/fair-pay-for-postdocs-why_b_10011066.html)

**Helpful webinar from CUPA**  
<http://www.cupahr.org/events/webinar-20160525.aspx>

**DoL Website/FAQ's**  
<https://www.dol.gov/WHD/overtime/final2016/>



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**Questions?**



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**Thank you!**



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**Expert Feedback on  
NIH Rigor and Transparency  
Guidelines**

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