Diversity, Inclusion, and Equality – It's Just Good Science!

Roxanne McGuire and Chris Ward, Veramed PHUSE EU Connect, 19-Nov-2025



IntroductionWhy Equality Matters To Us Representation
The Current State Is "Just Good Science" **Deep Dive Regulatory Context** Path Forward Where Are We Now? Conclusion **Acknowledgements Questions?**

Agenda



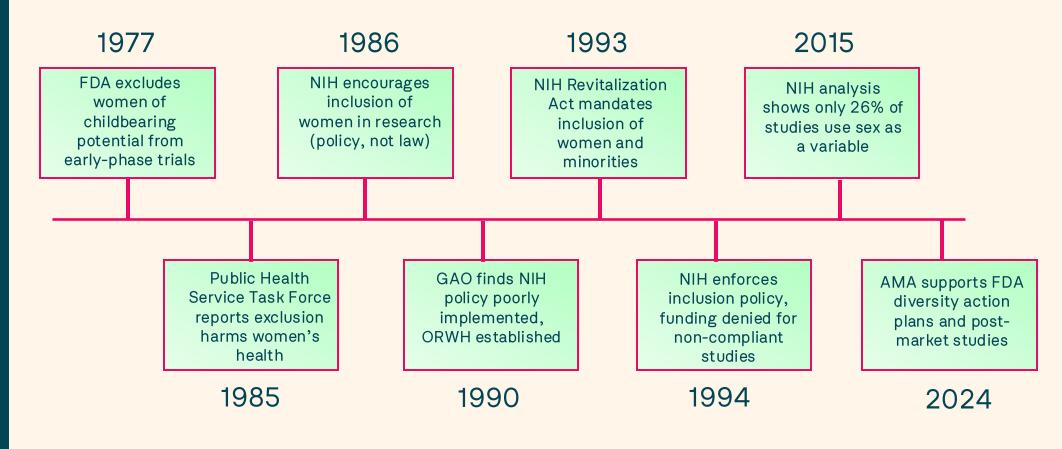


Introduction

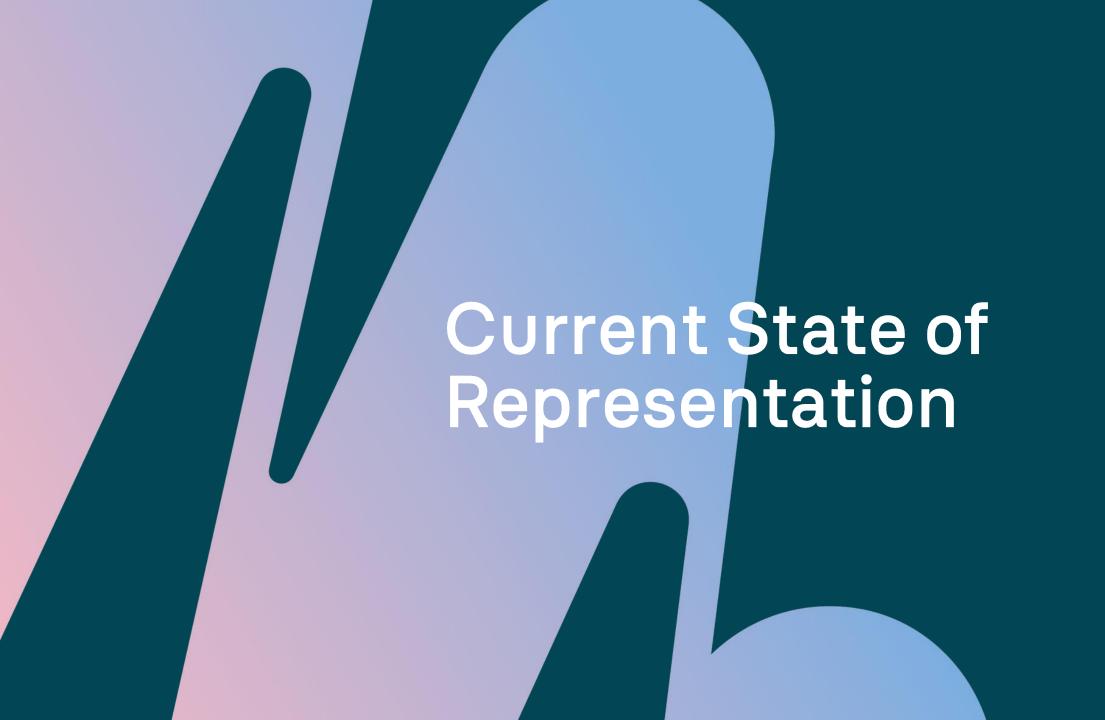
Why Equality Matters To Us.





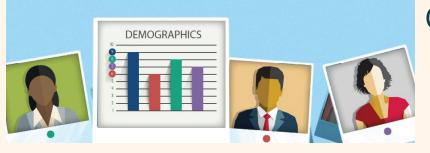


FDA = Food and Drug Administration, NIH = National Institutes of Health, GAO = US General Accounting Office, renamed in 2004 to US General Accountability Office, ORWH = Office of Research on Women's Health, AMA = American Medical Association.





DRUG TRIALS SNAPSHOTS SUMMARY REPORT





In 2020, CDER approved 53 novel drugs

Overall, 32,000 patients participated

	WOMEN	WHITE	BLACK or AFRICAN AMERICAN	ASIAN	HISPANIC	AGE 65 AND OLDER	UNITED STATES
AVERAGE	56%	75%	8%	6%	11%	30%	54%

^{*}The percentage of all other races combined (American Indian or Alaska Native, Native Hawaiian or other Pacific islander, Other, Unknown/Unreported) makes up to 100% of race category.

Percent Participation in Clinical Trials by Subpopulation* for New Molecular Entities and Therapeutic Biologics Approved in 2020

^{*} The percentage of Non-Hispanic and Unknown/Unreported ethnicity makes up to 100% of ethnicity category.

^{*} The percentage of patients from anywhere else in the world makes up to 100% of geographic category.

Review of DTS data published between 2015 and 2019 focusing on the participation at the U.S. trial sites.

TABLE 1 Clinical trials participation at the U.S. Sites by Race (N = 102,596)

White	Black Ameri	or African can Asia		erican Indian or ska Native (Other •
80,310 (78.27%		3 (16.31%) 2,13	9 (2.08%) 531		2,883 2.81%)

^{*}combined categories 'Native Hawaiian or Other Pacific Islander', 'Other race', 'Mixed race' and 'Unknown/Unreported/Missing'.

TABLE 2 Clinical Trials Participation at the U.S. Sites by Ethnicity (N = 102,596)

Hispanic or Latino	Not Hispanic or Latino	Missing
15,691 (15.29%)	77,353 (75.39%)	9,552 (9.31%)

TABLE 3 US Census Bureau Estimate* of the Resident Population in 2015 (N = 320,635,163)

Demographic Category	U.S. Population
Race	
White	247,382,690 (77.15%)
Black or African American	42,532,491 (13.26)
Asian	17,752,744 (5.53%)
American Indian or Alaska Native	4,004,358 (1.24%)
Ethnicity	
Hispanic or Latino	56,254,742 (17.54%)
Not Hispanic or Latino	129,427,521 (40.36%)

^{*}Adapted from US Census Bureau Population Division, Annual Estimates of the Resident Population.

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7 1110110011 111011011 11101101 1110110 1110110
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DEI

Is "Just Good Science"



Why Representation Matters



Affects accuracy, fairness and usefulness of medical research

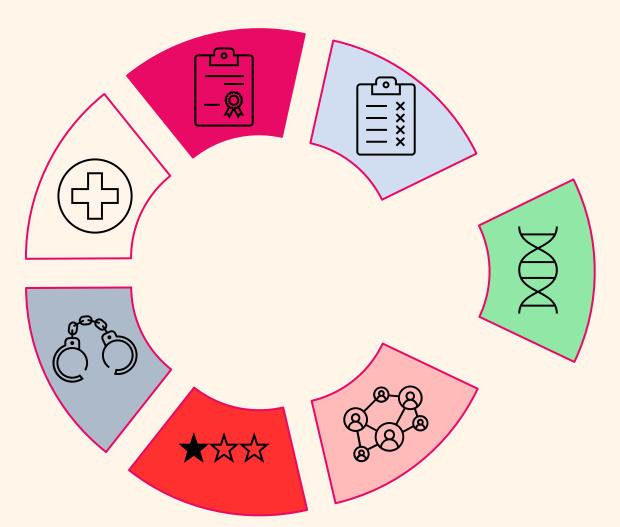


Data may not show how treatments work across different populations



Diverse participants
help researchers to
understand drug
safety and efficacy for
everyone

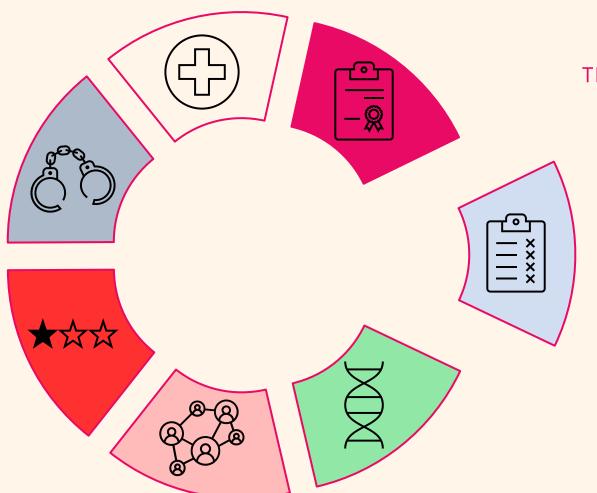




Pharmacogenomic Differences

Understanding pharmacogenomic differences across racial and ethnic groups is essential for delivering fair and effective healthcare especially in certain treatments, where genetic variation significantly influences drug response

Historical Failures

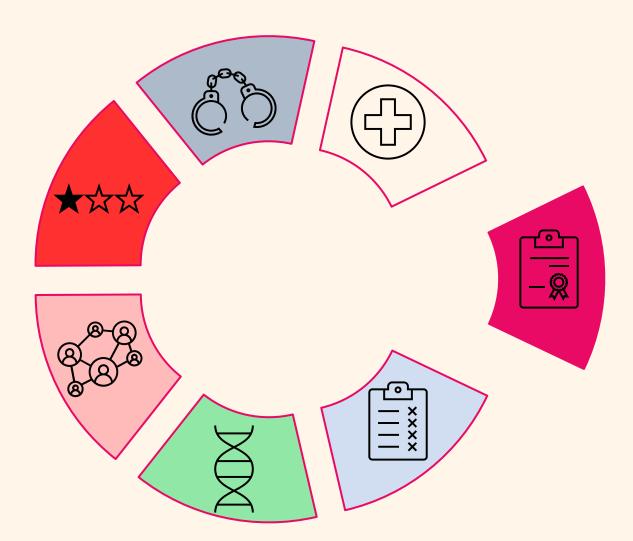


The Tuskegee Syphilis Studies and Henrietta Lacks







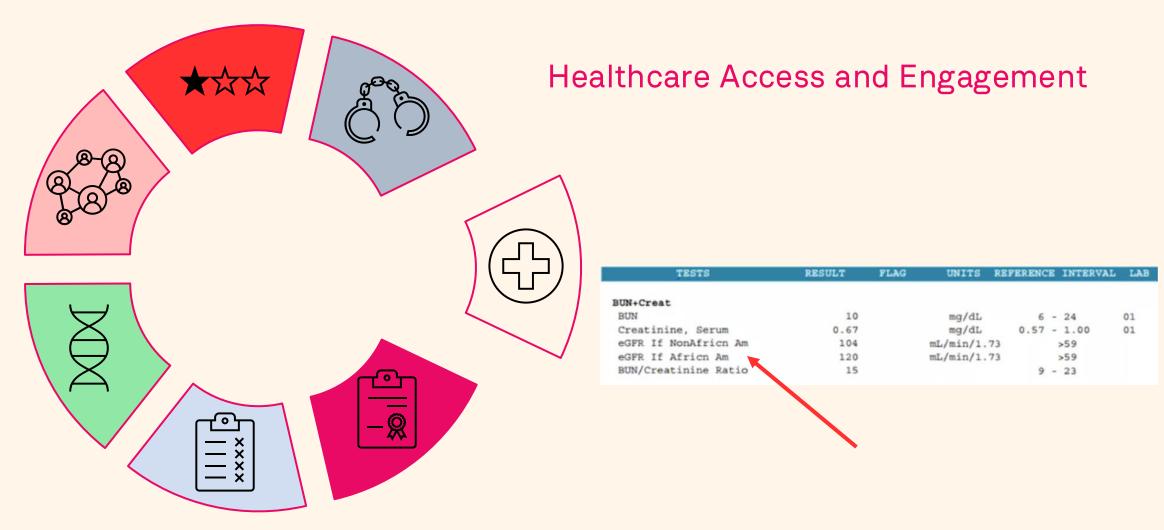


Data Integrity and Data Quality

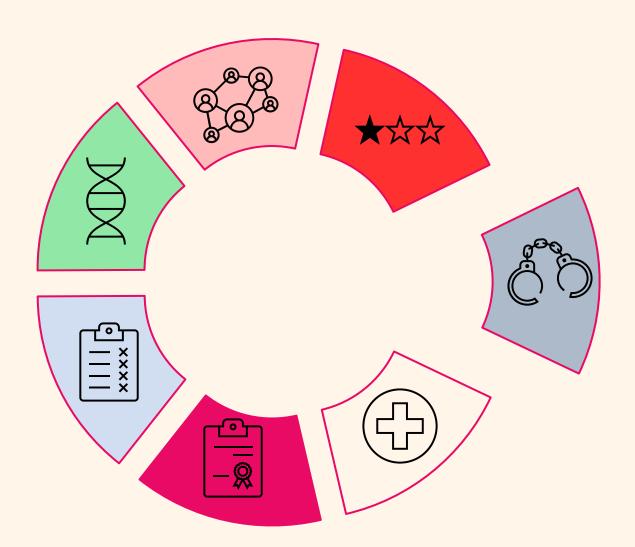
Failures in data integrity can significantly undermine the credibility of clinical research and hinder DEI efforts.

Data integrity (defined as the completeness, consistency, and accuracy of data) is essential for ensuring that clinical trial results are reliable and representative.







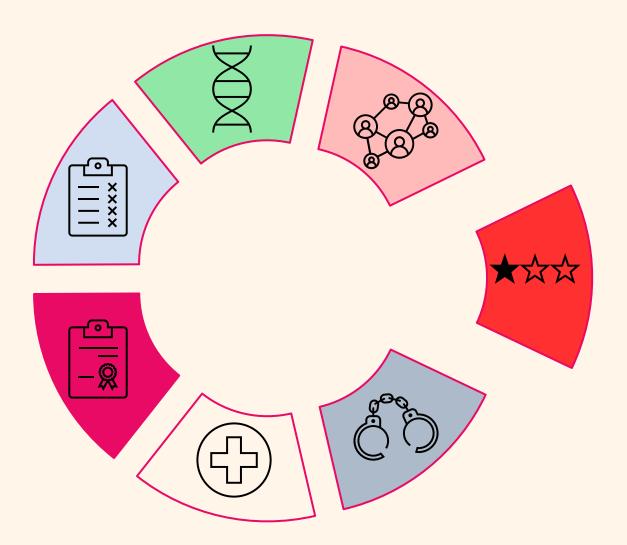


Research Fraud

Publication bias highlights the critical need for transparency in clinical research to ensure that treatment decisions are based on complete and accurate evidence

Underscores the importance of transparency, accountability, and inclusive evidence generation as foundational to achieving equity in health research



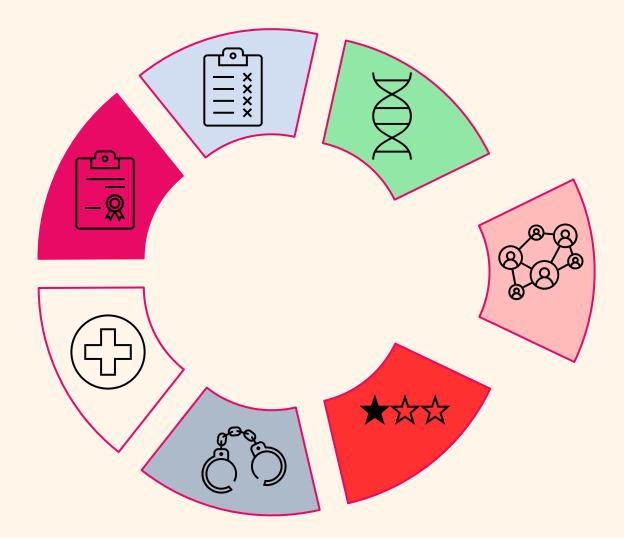


Data Integrity: Missed Safety



Social Factors





Mistrust in Medical Institutions:

underscores the critical importance of ethical conduct, community engagement, and culturally sensitive communication in clinical research, especially in regions with historical experiences of exploitation

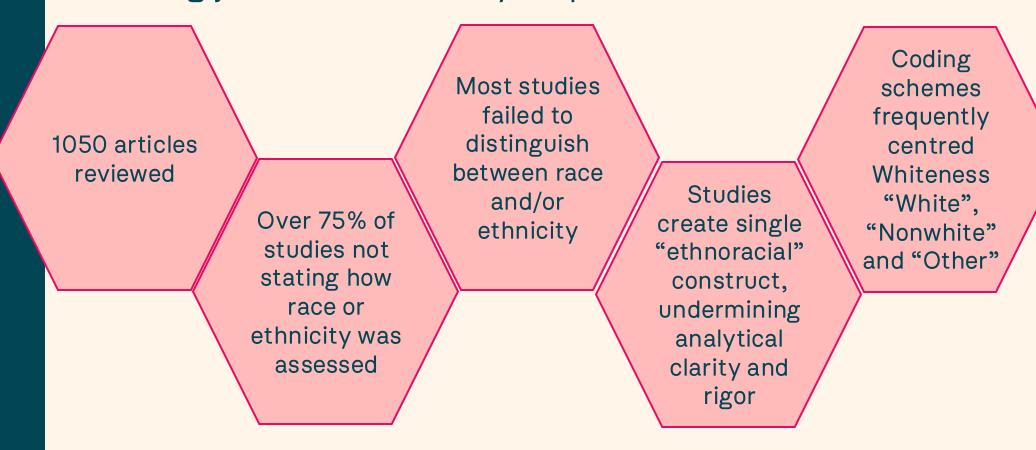
Socioeconomical Barriers:

barriers collectively hinder equitable representation in research and reinforce the need for inclusive trial design and outreach strategies.

Deep Dive Where Are We Now?



Systematic review in 2022 critically examines how race and ethnicity have been conceptualised, measured, and utilised in U.S.-based epidemiologic research published in five leading journals over a 23-year period



The NIH Clinical Trials Database

Whilst the clinicaltrails.gov database has its uses, data mining is challenging given the quantity of unstructured, free-text data and tabulated data non-standard coding

482 Variables – only 42 are standardised

Here min_age has variously been recorded as

"Min xx Years"

"xx Yrs"

"xx Years"

"Years: xx + exclusive"

"xx Weeks"



```
import pandas as pd
      df = pd.read_csv("extract_20251029_185257.csv")
       df = df.drop(columns = ["protocolSection.identificationModule.nctId",
                                "protocolSection.identificationModule.briefTitle",
                               "protocolSection.eligibilityModule.genderBased"])
       df.columns = [' date','sex','min age','agecats','max age']
       df['minage'] = df["min age"].str.extract(r"(\d+)", expand=False).astype("float")
       df['max_age'] = df["max_age"].str.extract(r"(\d+)", expand=False).astype("float")
       df['date'] = pd.to datetime(df[" date"], format="%Y-%m-%d", errors="coerce").dt.year
[34]: df
[34]:
                   date
                             sex min_age
                                                           agecats
                                                                    max_age minage
          0 2010-06-17
                                   18 Years ['ADULT', 'OLDER_ADULT']
                                                                                          NaN 2010.0
                                                                        NaN
          1 2023-11-01
                                           ['ADULT', 'OLDER ADULT']
                                   18 Years
                                                                        NaN
                                                                                  18.0
                                                                                          NaN 2023.0
           2 2022-12-01
                             ALL (23 Weeks
                                                          ['CHILD'] 12 Months
                                                                                 23.0
                                                                                           12.0 2022.0
                                   60 Years ['ADULT', 'OLDER_ADULT']
                2023-12
                                                                        NaN
                                                                                 60.0
                                                                                                 NaN
                         FEMALE
                                   18 Years
                                                                                  18.0
                2006-01
                                                          ['ADULT']
                                                                     45 Years
                                                                                           45.0
                                                                                                 NaN
       34038 2022-11-18
                                   18 Years ['ADULT', 'OLDER_ADULT']
                                                                     75 Years
                                                                                  18.0
                                                                                           75.0 2022.0
       34039 2027-10-30
                                   18 Years ['ADULT', 'OLDER_ADULT']
                                                                                  18.0
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       34040 2025-07-31
                                   18 Years ['ADULT', 'OLDER_ADULT']
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       34041 2023-06-26
                                                          ['ADULT']
                                                                     50 Years
                                                                                 21.0
                                                                                          50.0 2023.0
       34042 2021-12-31
                                   18 Years ['ADULT', 'OLDER_ADULT']
                                                                                 18.0
                                                                                          NaN 2021.0
                                                                        NaN
```



The NIH Clinical Trials Database

```
pd.set_option("display.max_colwidth", None)
txtdf = df = pd.read_csv("extract_20251029_194435.csv")
txtdf.iloc[:,4]
```

O All infants will be enrolled when in stable clinical condition within two weeks after birth. Therapy sessions will take place minimum three times per week on three different days of the week directly at the unit during the entire hospitalization until discharge. After discharge music therapy trea tment will be performed once a week until twelve months of corrected age.\n\nThe infant's wellbeing and relaxation during each session of music therapy will be measured using the following parameters:\n\nHRV (Heart Rate Variability) analysis Oxygen's saturation Stress level of the child\n\nInfants will be followed till 12 months of corrected age. Investigators will assess:\n\nNeuro-behavioral and neurological development of the child Stress level of the parents

Name: protocolSection.descriptionModule.detailedDescription, dtype: object

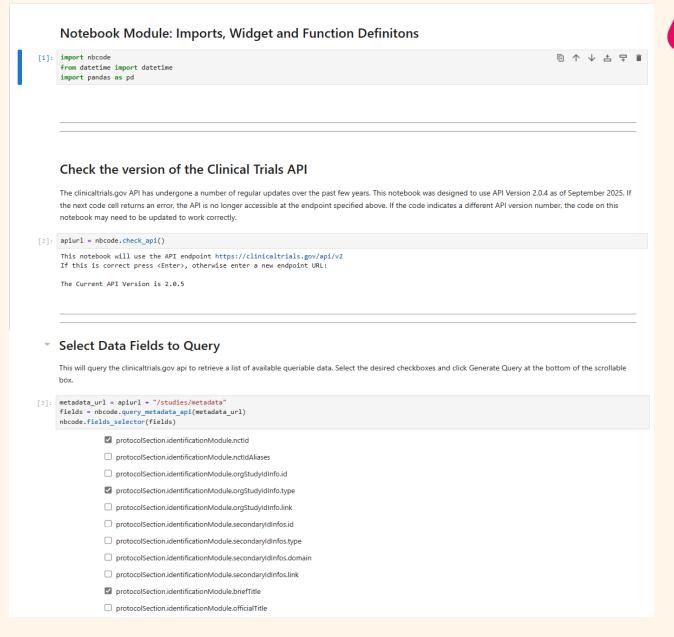
Much of the relevant information is available in free text form.

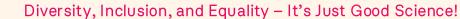
Given the lack of standard layout and variations in terminology extracting this data programmatically was challenging.

A task for an Al Agent!
Unfortunately, that was beyond the scope and budget available for this project

A Simple Graphical Interface to the API

The API provides a far richer data source that the web-query tool. We can simplify the process of accessing the data but problems with the data standardisation still remain.





A Simple Graphical Interface to the API

Query Terms and Date Range

Select a study start and end date range and one or more idications to query



Run The Specified Query

```
[11]: queryterm = nbcode.build_query(nbcode.get_form_result())
       queryurl = apiurl + "/studies"
      params = { "filter.advanced": queryterm, "pageSize": 100, "fields": nbcode.sections['fields'], "countTotal": "true" }
      data = nbcode.query_api(params,queryurl)
       df = pd.json_normalize(data, sep=".")
       for col in df.columns:
           if df[col].apply(lambda x: isinstance(x, list) and all(isinstance(i, dict) for i in x)).any():
               df = df.explode(col).reset index(drop=True)
               normalized = pd.json_normalize(df[col], sep=".")
               normalized.columns = [f"{col}.{subcol}" for subcol in normalized.columns]
               df = df.drop(columns=[col]).join(normalized)
      timestamp = datetime.now().strftime("%Y%m%d_%H%M%S")
      filename = f"extract {timestamp}.csv"
      df.to_csv(filename, index=False)
      df.head()
      Fetching pages: 0/? [00:00<?, ?page/s]
                                                  protocolSection.identificationModule.briefTitle protocolSection.descriptionModule.briefSummary protocolSection.eligibilityN
         protocolSection.identificationModule.nctld
                                                    Phase II Randomized Study of Early Surgery Vs ..
                                     NCT00004758
                                                                                                     OBJECTIVES: I. Evaluate the efficacy of surgic...
                                    NCT01653535
                                                    Multisite Prevention of Conduct Problems (Fast...
                                                                                                     The primary aim of this project is to evaluate...
```





Regulatory Context



The requirement to embed DEI into clinical research has gained substantial traction, driven by both ethical considerations and the need for scientifically robust data that reflects real-world populations.

Regulatory agencies have responded with a suite of guidance documents that underscore the necessity of inclusive trial design, recruitment, and reporting practices.

Enhancing the Diversity of Clinical Trial Populatione – Eligibility C1 Enrollment Prac Trial Desi

Guidance for In

of clinically significan

Inclusion of racial and clinical trial data by r products (e.g., pharm

racially and ethnically differences may be at elimination), extrinsion

12 For considerations regarding the inclusion industry Considerations for the Inclusion of

13 For considerations regarding the inclusion for industry Cancer Clinical Trial Eligibility Patients (July 2020).

14 For the purposes of this guidance, the tern

Center for Biologics Evaluation and Ri November 2020 Clinical/Medical

U.S. Department of Health and Hui

Center for Drug Evaluation and Res

Food and Drug Administra

- Inclusion of children and adolescents in confirmatory clinical trials involving Inclusion of women 14 in clinical trials in adequate numbers to allow for analysis

Inclusion of women in clinical trials in adequate numbers to anow for analysis by sex, 15 for example, by avoiding unjustified exclusion based on sex and taking other actions to promote inclusion. For most drugs, representatives of both other actions to promote inclusion. sexes should be included in the sexual sexua

Sponsors should consider various trial design and methodological approaches that will facilitate

The following are examples of approaches to concider.

The following are examples of approaches to concider. Sponsors snown consider various trial design and methodological approaches that will facilit enrollment of a broader population. The following are examples of approaches to consider: • Consider characterizing — in early clinical development — drug metabolism and differently (e.g. clear the drug differently (e.g. c Consider characterizing — in early characterizing and evelopment — drug metabolism and (e.g., clearance across populations that may metabolize or clear the drug differently characterization older adults and participants with liver or kidney dysfunction. Farly characterization clearance across populations that may metabolize or clear the drug differently (e.g., learning across populations that may metabolize or clear the drug differently (e.g., learning differently (e.g.,

- older adults and participants with liver or kidney dystinction). Early characterization of drug metabolism and clearance across groups will help avoid later exclusions and, of drug metabolism and clearance across groups will help avoid later exclusions and cafety more generally will allow dose adjustment to optimize affectiveness and cafety. or arug metabolism and clearance across groups will neip avoid later exclusions to more generally, will allow dose adjustment to optimize effectiveness and safety across different populations • Using an adaptive clinical trial design would allow for pre-specified trial design. Using an adaptive clinical trial design would allow for pre-specified trial the trial changes during the trial when data become available, including altering if there are changes during the trial when data become available, including altering if there are changes during the trial when data become available, including altering if there are changes during the trial when data become available, including altering if there are changes during the trial when data become available, including altering if there are changes during the trial when data become available, including altering if there are changes during the trial when data become available, including altering if there are changes during the trial when data become available, including altering if there are
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 22 An adaptive design can start with a narrow population based on interim sate opposition.

 23 An adaptive design can start with a proposition based on interim sate opposition. population.— An adaptive design can start with a narrow population in there are safety concerns about safety and can expand to a broader population based on interim safety and can expand to a broader population based on interim safety and can expand to a broader population based on interim safety and can expand to a broader population based on interim safety and can expand to a broader population based on interim safety and can expand to a broader population based on interim safety. concerns about sarety and can expand to a broader population based on interim satety data from the trial that provide support for doing so. Adaptive trials may also provide for broader enrollment when there is uncertainty regarding whether the data with the for broader enrollment when there is uncertainty regarding whether the data with the data with the data when there is uncertainty regarding whether the data with the data when there is uncertainty regarding whether the data with the data when there is uncertainty regarding whether the data when there is uncertainty regarding whether the data when there is uncertainty regarding whether the data when the data when there is uncertainty regarding whether the data when the data from the trial that provide support for doing so. Adaptive trials may also provide for broader enrollment when there is uncertainty regarding whether the drug will enable safe and effective in certain populations with an interim analysis that will enable for oroader enrollment when there is uncertainty regarding whether the drug will be safe and effective in certain populations, with an interim analysis that will enable adjustment of future enrollment based on pre-specified criterio regarding reconstants. sate and effective in certain populations, with an interim analysis that will enable adjustment of future enrollment based on pre-specified criteria regarding response. Consider a broader pediatric development program early. The arbitrary sequential
 - Consider a proader pediatric development program early. The arbitrary sequential enrollment of pediatric subgroups by chronological age for some conditions the nonlational enrollment of pediatric subgroups of medicines for children by limiting the nonlational enrollment of medicines for children by limiting the nonlational enrollment of medicines for children by limiting the nonlational enrollment of medicines for children by limiting the nonlational enrollment of medicines for children by limiting the nonlational enrollment of medicines for children by limiting the nonlational enrollment of medicines for children by limiting the nonlational enrollment of medicines for children by limiting the nonlational enrollment of medicines for children by limiting the nonlational enrollment of medicines for children by limiting the nonlational enrollment of medicines for children by limiting the nonlational enrollment of medicines for children by limiting the nonlational enrollment of medicines for children by limiting the nonlational enrollment of medicines for children by limiting the nonlational enrollment of medicines for children by limiting the nonlational enrollment of medicines for children by limiting the nonlational enrollment of medicines for children by limiting the nonlational enrollment of medicines for children by limiting the nonlational enrollment of medicines for children by limiting the nonlational enrollment of medicines for children by limiting the nonlational enrollment of medicines for children by limiting the nonlational enrollment of medicines for children by limiting the nonlational enrollment of medicines for children by limiting the nonlational enrollment of medicines for children by limiting the nonlational enrollment of medicines for children by limiting the nonlational enrollment of medicines for children by limiting the nonlational enrollment of medicines for children by limiting the nonlational enrollment of medicines for children by limiting the nonlational enrollment of medicines for chi enronment of pediatric subgroups by enronological age for some conditions the population unnecessarily delay development of medicines for children by limiting the population of study. Therefore staggaring annuluses in pediatric study. for study. Therefore, staggering enrollment in pediatric studies based on or study. Inererore, staggering enroument in pediatric participants first, then younger chronological age (i.e., enrollment of older pediatric participants) should be instifted with a class scientific extracted of the pediatric participants. enronological age (i.e., enrollment of older pediatric participants first, then young pediatric participants) should be justified with a clear scientific rationale (e.g., a length of potential developmental safety concern) 23 known or potential developmental safety concern).23

"Enhancing the Diversity of Clinical Trial Populations, Eligibility Criteria, Enrolment Practices, and Trial Designs - Guidance for Industry", published November 2020.

Collection of Race and Ethnicity Data in Clinical Trials

Guidance for Indus

Food and Drug Administ

omh@fda.hhs.gov.

IV. COLLECTING RACE AND ETHNICITED.



CLINICAL TRIALS

The classifications discussed below provide a minim presenting data on race and ethnicity for Federal rel Policy Directive 15, the categories in this classificat not be interpreted as being scientific or anthropolog determinants of eligibility for participation in any F developed to provide a common framework for unit ueveroped to provide a common mannework for time use of data on race and ethnicity by Federal agencie

The recommendations in this section reflect the Ag for more consistent demographic subgroup data col for more consistent demographic subgroup data continuities and outside the United States, the Agency rel is based on the current OMB Directive for collecting recommendations are also consistent with the form set forth in NIH guidance 47.

Document issued on October 26 For questions about this document, contact the FDA Office of Min

A. Two-Question Format In order to be consistent with OMB and other recommends using the two-question format fo with the ethnicity question preceding the ques Question 1 (answer first): Do you consider y

Question 2 (answer second): Which of the fo Hispanic/Latino?

describes you? More than one choice is accept

FDA recommends that trial participants self-re B. Self-Reporting those individuals be permitted to designate a m self-reported designations is not feasible (e.g., respond), we recommend that the information other knowledgeable source. Race and ethnicit conducting the trial.

For ethnicity, we recommend the following min C. Ethnicity

In certain situations, as recommended in OMB Policy Directive 15, more detailed race and ethnicity information may be desired. For example for clinical trials conducted outside. E. Use of More Detailed Racial and Ethnic Categories In certain situations, as recommended in OMB Policy Directive 15, more detailed race an ethnicity information may be desired. For example, for clinical trials conducted outside ethnicity information may be desired. For example, for clinical trials conducted outside ethnicity information may be desired. For example, for clinical trials conducted outside ethnicity information may be desired. ethnicity information may be desired. For example, for clinical trials conducted outside the United States, FDA recognizes that the recommended categories for race and ethnicity the United States, FDA recognizes that the recommended categories may not adequately describe the United States and that these categories may not adequately describe the United States and that these categories may not adequately described the United States and that these categories may not adequately described the United States and that these categories may not adequately described the United States. the United States. FDA recognizes that the recommended categories for race and ethnicity

Were developed in the United States and that these categories may not adequately describe

Were developed in the United States and that these Categories may not reflect origins in were developed in the United States and that these categories may not adequately described and ethnic groups in foreign countries. Furthermore, White can reflect origins from areas ranging from a reason of North Africa. Asian can reflect origins from a reason of North Africa. racial and ethnic groups in foreign countries. Furthermore, White can reflect origins in Europe, the Middle East, or North Africa; Asian can reflect origins from areas ranging from India to Ianan In situations where appropriate, FDA recommends using more detailed categories by geographic region to provide sponsors the flexibility to adequately characterize race an In situations where appropriate, FDA recommends using more detailed categories by geographic region to provide sponsors the flexibility to adequately characterize race and geographic region to provide sponsors the flexibility to adequately characterize race and geographic region to provide sponsors the flexibility to adequately characterize and continued in the 2011 HHS Implementation Guidance on Data Collection ethnicity. geographic region to provide sponsors the flexibility to adequately characterize race and ethnicity. As outlined in the 2011 HHS Implementation Guidance on Data Collection.

Standards for Race Ethnicity Sex Primary Language and Disability Status. ethnicity. As outlined in the 2011 HHS Implementation Guidance on Data 4 if additional Status of France of Standards for Race, Ethnicity, Sex, Primary Language, and Disability Status of enhance of ethnicity are collected to enhance of the enhance of th Standards for Race, Ethnicity, Sex, Primary Language, and Disability Status⁴, if additional granularity or more detailed characterizations of race or ethnicity are collected to enhance granularity or more detailed characterizations of the trial narticinants FDA recommends these characterizations be understanding of the trial narticinants. from India to Japan. granuarity or more detailed characterizations of race or ethnicity are collected to enhi understanding of the trial participants, FDA recommends these characterizations for ethnicitu traceable to the five minimum designations for race and two designations for ethnicitudes. understanding of the trial participants, FDA recommends these characterizations be traceable to the five minimum designations for race and two designations for HHS listed in sections D and C above. Example (from the above referenced 2011 HHS) traceable to the five minimum designations for race and two designations for ethnic listed in sections D and C above. Example (from the above referenced 2011 HHS Ethnicity Data Standard

Are you Hispanic, Latino a, or of Spanish origin? (One or more categories may be selected) These categories roll up to the Hispanic of Latino category of Guidance4): No, not of Hispanic, Latino/a, or Spanish origin

a. No, not of Hispanic, Latino/a, or Spanish unique
b. Yes, Mexican, Mexican American, Chicano/a _ res, cuban _ res, Another Hispanic, Latino/a or Spanish origin . <u>Nace Data Manuaru</u>
What is your race? (One or more categories may be selected) These categories are part of the current OMB standard Black or African American American Indian or Alaska Native These categories roll up to the Asian d. Asian Indian
Chinese category of the OMB standard These categories roll-up to the Native Hawaiian of Other Pacific Islander category of the OMB standard e. Filipino Japanese Korean Vietnamese Other Asian Native Hawaiian Guamanian or Chamorro Other Pacific Islander

Clinical Medical "Collection of Race and Ethnicity Data in Clinical Trials Guidance for Industry and Food and Drug Administration Staff", Issued on 26 October 2016, updated January 2025.



U.S. Department of Health and Human Serv

Food and Drug Administration (FD

Center for Drug Evaluation and Research

Center for Biologics Evaluation and Research

Center for Devices and Radiologic Health

Office of the Commissioner (OC

Office of Minority Health (OMH

Office of Women's Health (OWH)

October 2016

Diversity Plans to Improve Enrollment of Participants from Underrepresented Racial and Ethnic Populations in PRAFT GUIDANCE required and/or for which clinical studies are intended to support a marketing submission under which clinical studies are intended to support a marketing submission under when there are data that indicate that the medical studies are intended to support a marketing submission under when the section 3.51(a) of the Public Health Service Act for a standalone Riological that indicate that the medical studies are intended to support a marketing submission under when the section 3.51(a) of the Public Health Service Act for a standalone Riological that indicate that the medical studies are intended to support a marketing submission under when the section 3.51(a) of the Public Health Service Act for a standalone Riological that indicate that indicate that indicate that indicate the medical standalone Riological that indicate that indicate that indicate that indicate the medical standalone Riological that indicate that indicate the medical standalone Riological that in Clinical Trials Guidance for Ind Comments and suggestions regarding this draft document should required and/or for which clinical studies are publication in the Federal Register of the notice announcing the a supplemental required and suggestions regarding this draft document should supplemental required and suggestions regarding this draft document should supplemental required and suggestions regarding this draft document should supplemental required and suggestions regarding this draft document should supplemental required and suggestions regarding this draft document should supplemental required and suggestions regarding this draft document should supplemental required and suggestions regarding this draft document should supplemental required and suggestions regarding this draft document should supplemental required and suggestions regarding this draft document should supplemental required and suggestions regarding this draft document should supplemental required and supplemental required req Comments and suggestions regarding this draft document should whether a premarket notification (510(k))²⁰; whether a premarket notification for which is a whether a premarket notification for which is a whether a premarket notification for which is a suggestion of the notice announcing the a whether a premarket notification for which is a suggestion of the notice announcing the a whether a premarket notification for which is a suggestion of the notice announcing the a whether a premarket notification for which is a suggestion of the notice announcing the a whether a premarket notification for which is a suggestion of the notice announcing the a whether a premarket notification for which is a suggestion of the notice announcing the a whether a premarket notification for which is a suggestion of the notice announcing the a whether a premarket notification for which is a suggestion of the notice announcing the a whether a premarket notification for which is a suggestion of the notice announcing the a whether a premarket notification for which is a suggestion of the notice announcing the a whole is a suggestion of the notice announcing the a whole is a suggestion of the notice announcing the a whole is a suggestion of the notice announcing the a whole is a suggestion of the notice announcing the a whole is a suggestion of the notice announcing the a whole is a suggestion of the notice announcing the a whole is a suggestion of the notice announcing the a whole is a suggestion of the notice announcing the a whole is a suggestion of the notice announcing the a whole is a suggestion of the notice announcing the a whole is a suggestion of the notice announcing the a whole is a suggestion of the notice announced the suggestion of the notice announced publication in the Federal Register of the notice announcing the a whether a premarket notification (> 1U(K))^{e-0}, | whether a premarket notification (> 1U(K))^{e-0}, | whether a premarket notification (> 1U(K))^{e-0}, | classification request²², or a humanitarian de classification request²², or a humanitarian de classification request²³, or a humanitarian de classification request²⁴, or a humanitarian de classification request²⁵. All comments should be a classification request²⁶, or a humanitarian de classification request²⁷. All comments should be a classification request²⁸. All comments should be a classification request²⁹. All comments sho to the Dockets Management Staff (HFA-305), Food and Drug Ad evaluate the Race and Ethnicity Diversity Pla Lane, Rm. 1061, Rockville, MD 20852. All comments should by number listed in the notice of availability that publishes in the Foundation for the Power Program. Lane, Rm. 1061, Rockville, MD 20852. All comments should be program. number listed in the notice of availability that publishes in the Fee TIMELINES AND PROCESS FOR For questions regarding this draft document, contact (OCE/CDER DIVERSITY PLANS ror quesuons regarding uns graff document, confact (OCEICDE) 0205, (CBER) Office of Communication, Outreach, and Develop Food and Drug Administration Oncology Center of Excellence (OC or for Drug Evaluation and Research 402-8010, or CDRHClinicalEvidence@fda.hhs.gov. Oncology Center of Excellence (OC Sponsofs may discuss their strategy to Center for Drug Evaluation and Research the medical product's development. 24 Center for Biologics Evaluation and Resear

WHEN A RACE AND ETHNICITY DIVERSITY PLAN IS RECOMMENDED

- When there are data that indicate that the medical product may perform differentially FDA recommends a Plan be submitted for medical products for which an IND submission is sequired and/or for which clinical etudies are intended to support a marketing submission under the submission in the sequired and/or for which clinical etudies are intended to support a marketing submission is When there are data that indicate that the medical product may perform differentially across the population based on factors associated with race or ethnicity, the Plan should across the population based on factors associated with race or ethnicity the safety and specify the study design features that will support analyses that will inform the safety and specify the study design features that will support analyses that will inform the safety and specify the study design features that will support analyses that will support analy FDA recommends a Plan be submitted for medical products for which an IND submission under required and/or for which clinical studies are intended to support a marketing submission under sequired and/or for which clinical studies are intended to support a marketing submission under required and/or for which clinical studies are intended to support a marketing submission under sequired and/or for which clinical studies are intended to support a marketing submission under sequired and/or for which clinical studies are intended to support a marketing submission under sequired and/or for which clinical studies are intended to support a marketing submission under sequired and/or for which clinical studies are intended to support a marketing submission. across the population based on factors associated with race or emnicity, the Plan Should specify the study design features that will support analyses that will inform the safety and affectiveness of the medical product in the calculate special and affectiveness of the medical product in the calculate special and affectiveness of the medical product in the calculate special and affectiveness of the medical product in the calculate special and affectiveness of the medical product in the calculate special and affectiveness of the medical product in the calculate special and affectiveness of the medical product in the calculate special and affectiveness of the medical product in the calculate special and affectiveness of the medical product in the calculate special and affectiveness of the medical product in the calculate special and affectiveness of the medical product in the calculate special and affectiveness of the medical product in the calculate special and affectiveness of the medical product in the calculate special and affectiveness of the medical product in the calculate special and affectiveness of the medical product in the calculate special and affectiveness of the medical product in the calculate special and affectiveness of the calculate spe specify the study design realties that will support analyses that will inform the safety effectiveness of the medical product in the relevant racial and ethnic populations. In a greater than proportional enrollment of certain populations. effectiveness of the medical product in the relevant racial and ethnic populations. In some cases, increased (i.e., greater than proportional) enrollment of certain populations when there are no data that may be needed to elucidate potential important differences. some cases, increased (i.e., greater than proportional) enrollment of certain populations may be needed to elucidate potential important differences. When there are no any be needed to elucidate potential impact safety or effectiveness it is nonetheless indicate that race or ethnicity will impact safety or effectiveness. may be needed to elucidate potential important differences. When there are no data indicate that race or ethnicity will impact safety or effectiveness, it is nonetheless. muicaie mai race or empicity will impact sarcty or effectiveness, it is noncinces FDA recognizes appropriate that enrollment reflects the epidemiology of the disease.

 Appropriate that enrollment reflects the epidemiology of the sufficient to detect any that enrollment based on epidemiology alone may not be sufficient to detect any that enrollment based on epidemiology alone may not be sufficient to detect any that enrollment based on epidemiology alone may not be sufficient to detect any that enrollment based on epidemiology alone may not be sufficient to detect any that enrollment based on epidemiology alone may not be sufficient to detect any that enrollment based on epidemiology alone may not be sufficient to detect any that enrollment based on epidemiology alone may not be sufficient to detect any that enrollment based on epidemiology alone may not be sufficient to detect any that enrollment based on epidemiology alone may not be sufficient to detect any that enrollment based on epidemiology alone may not be sufficient to detect any that enrollment based on epidemiology alone may not be sufficient to detect any that enrollment based on epidemiology alone may not be sufficient to detect any that enrollment based on epidemiology alone may not be sufficient to detect any that enrollment based on epidemiology alone may not be sufficient to detect any that enrollment based on epidemiology alone may not be sufficient to detect any that enrollment based on epidemiology alone may not be sufficient to detect any that enrollment based on epidemiology alone may not be sufficient to detect any that enrollment that enrollment the enrollment that enrollment the enrollment that enrollment that enrollment the enrollme appropriate that enrollment reflects the epidemiology of the disease. FDA recognitive that enrollment based on epidemiology alone may not be sufficient to detect any differences in cafety and effectiveness or make such inferences. however, consists that enrollment based on epidemiology alone may not be sufficient to detect any differences in cafety and effectiveness or make such inferences. mat enrollment based on epidemiology alone may not be sufficient to detect any differences in safety and effectiveness or make such inferences; however, consistent differences in safety and effectiveness or make such inferences; however, consistent differences in safety and effectiveness or make such inferences; however, consistent differences in safety and effectiveness or make such inferences; however, consistent differences in safety and effectiveness or make such inferences; however, consistent differences in safety and effectiveness or make such inferences.
 - ourresences in safety and effectiveness of make such inferences; nowever, consiste representative enrollment may provide opportunities for pooling data to evaluate outcomes by some and ethnicity. The Plan should outline the sponsor's plan to collect data to explore the potential for differences in safety and/or effectiveness associated with race and ethnicity throughout The Pian should outline the sponsor's plan to collect data to explore the potential for differences in safety and/or effectiveness associated with race and not inst during the nivotal the entire development life-cycle of the medical product and not inst during the nivotal the entire development life-cycle of the medical product and not inst during the nivotal the entire development life-cycle of the medical product and not inst during the nivotal the entire development life-cycle of the medical product and not inst during the nivotal three developments.
 - differences in safety and/or effectiveness associated with race and ethnicity throughout the entire development life-cycle of the medical product and not just during the pivotal trial(s) or studies In certain situations, it may be challenging to set an enrollment goal based on the in certain situations, it may be challenging to set an enrollment goal based on the epidemiology of the disease due to limited data to characterize the incidence and of the disease due to limited data to characterize the incidence and the epidemiology of the disease due to limited data to characterize the incidence and the epidemiology of the disease due to limited data to characterize the incidence and the epidemiology of the disease due to limited data to characterize the incidence and the epidemiology of the disease due to limited data to characterize the incidence and the epidemiology of the disease due to limited data to characterize the incidence and the epidemiology of the disease due to limited data to characterize the incidence and the epidemiology of the disease due to limited data to characterize the incidence and the epidemiology of the disease due to limited data to characterize the incidence and the epidemiology of the disease due to limited data to characterize the incidence and the epidemiology of the disease due to limited data to characterize the epidemiology of the disease due to limited data to characterize the epidemiology of the disease due to limited data to characterize the epidemiology of the disease due to the epidemiology of the epidemiology o
 - epidemiology of the disease due to limited data to characterize the incidence and/or and the disease due to limited data to characterize the incidence and/or epidemiology of the disease across diverse racial/ethnic populations (e.g., diseases that are prevalence of the disease across diverse racial/ethnic populations (e.g., diseases that are prevalence of the disease across diverse racial/ethnic populations (e.g., diseases that are prevalence of the disease across diverse racial/ethnic populations (e.g., diseases that are prevalence of the disease across diverse racial/ethnic populations (e.g., diseases that are prevalence of the disease across diverse racial/ethnic populations (e.g., diseases that are prevalence of the disease across diverse racial/ethnic populations). prevalence of the disease across diverse racial/ethnic populations (e.g., diseases that are defined by the presence of a rare molecular aberration). FDA encourages sponsors to defined by the presence of a rare molecular aberrature and real-world data) to set leverage various data sources (e.g. nublished literature and real-world data) to set derined by the presence of a rare molecular averration). FDA encourages sponsors leverage various data sources (e.g., published literature and real-world data) to set enrollment moals: if this is not feasible, it may be approximate to get the general moals and real-world data. leverage various data sources (e.g., published literature and real-world data) to set enrollment goal set the enrollment goal set this is not feasible, it may be appropriate to set the enrollment goal based on demographics in the overall normation with the disease or condition enroument goals; it this is not reasible, it may be appropriate to set the enroume based on demographics in the overall population with the disease or condition. The Plan should include the clinical pediatric studies that are planned for inclusion as part
 of the pediatric development of the medical product.
 - of the pediatric development of the medical product.

"Diversity Plans to Improve Enrolment of Participants from Underrepresented Racial and Ethnic Populations in Clinical Trials Guidance for Industry" - Draft Guidance, published in the Federal Register on April 14, 2022.

A. For drugs, sponsors should submit the

practicable during drug development feedback regarding the applicable piv

meeting). The Plan can be submitted

Diversity, Inclusion, and Equality – It's Just Good Science!

Center for Biologics Evaluation and Resear

Center for Devices and Radiological Healt

Office of Minority Health and Health Equity

Clinical/Medical

Theme 4: Evidence-led diversity and inclusion As a research organisation, the NIHR is committed to an evidence-led approach. As such, we are committed to embedding evidential practice in all of our research inclusion work. This is more than

just collecting and analysing diversity data. We must We aim to fund research that: research generates can improve understanding of he generate insights relating to the inclusion of health £ evidence-led approach to research inclusion will help to improve diversity and inclusion across our people

In 2021, NIHR published its first Diversity Data Repo fully representative of the society we serve. In light (quality qualitative and quantitative data are required targeted, impactful and sustainable.

Building on the publication of data in 2021, we will:

- continue to systematically collect, analyse and re
- coordinate the collection, analysis and publicatio
- improve the transparency of NIHR awards by pul
 - characteristics and other areas, including the valu
- launch the NIHR Diversity and Inclusion Data Da trends, disseminate reports and provide relevant
- identify and leverage partnerships with external: advocacy groups and private industry, to identify
- incorporate diversity and inclusion data in the NI tracking our progress as a key organisational outc

- tackles long-standing structural barriers that hinder certain groups from contributing to, is inclusive by design, with methods suited to the target participants
 - participating in, and delivering research

To further our mission and effectively address health inequalities and under-served communities, We have formulated our first Research Inclusion Strategy aimed at embedding and achieving these

Our Research Inclusion Strategy 2022-2027 will serve as a road map for implementing inclusive practice in our research, culture and systems. It will at once enable us to address issues across our entire people framework (see Appendix 1), while empowering better health outcomes for the critical objectives.

national and global community.

Our operating principle for inclusion

We are committed to equality, diversity and inclusion in everything we do. Diverse people and Communities shape our research, and we strive to make opportunities to participate in research an

integral part of everyone's experience of health and social care services. $We \, develop \, researchers \, from \, multiple \, disciplines, special is ms, geographies \, and \, backgrounds, and \, backgrounds$ Work to address barriers to career progression arising from characteristics such as sex, race or

disability.

"NIHR Research Inclusion Strategy 2022 - 2027" - Issued 26 September 2022, Version: 3.0 - July 2025

Diversity, Inclusion, and Equality – It's Just Good Science!



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Guid

inclu

Last updated

Submission of a Plan with an application is not mandatory, nowever it is encouraged When is a Plan needed? develop a Plan if you're a sponsor or a researcher plant

 a clinical trial of an investigational medicinal pro a clinical investigation or other study of a medic includes:

a combined trial of an investigational medicinal

any other clinical trial to study a novel intervent

interventions in clinical practice.

Observational studies are out of scope for this guida

Single studies, multi-phase studies and development

You can submit a Plan for a single study, or you can programme clearly indicating the information that is

Early phase trials and Healthy Volunteer trials

Inclusivity should be considered from the very first st consider full justification of any population that wou context of the overall product development program

Submission of a Plan is not mandatory, and we do n behalf of sponsors, to develop their own Plan. Howe Healthy Volunteer trials, you can briefly describe and your research ethics application, providing assurance

People and groups to consider in a Although under-served people and groups are generally considered to be people groups who are less represented in health research, the communities man consume mode 9 Virgues with the context of study. The NIHR have identified several characteristics common to vary depending on the context of study.

• high healthcare burden that is not matched by the volume of research designed for the group lower inclusion in research than one would expect from population estimates important differences in how a group responds to or engages with healthcare interventions under-served groups including:

- Compared to other groups, With research neglecting to address these factors.

It's important that the study population reflects the real-world and every effort should be made to include the full range of people who the research is for and about. You should consider: • reaching out to the people and communities who could be impacted by your research • the effect of your work on minority communities, under-served groups, people who have been identified with health inequalities. how your study population reflects the real-world population · The effect of your work on minority communities, under-served groups, people who have be identified with health inequalities, people with poor literacy, people from different cultural identified with health inequalities, people with protected characteristics.

- sharing back your findings with under-served groups, to build trust in the effect of their

The HRA and INVOLVE have previously released a briefing explaining the value of public involvement in the HRA and INVOLVE have previously released a briefing explaining the value of public involvement in the HRA and INVOLVE have previously released a briefing explaining the value of public involvement in the HRA and INVOLVE have previously released a briefing explaining the value of public involvement in the HRA and INVOLVE have previously released a briefing explaining the value of public involvement in the HRA and INVOLVE have previously released a briefing explaining the value of public involvement in the HRA and INVOLVE have previously released a briefing explaining the value of public involvement in the HRA and INVOLVE have previously released a briefing explaining the value of public involvement in the HRA and INVOLVE have previously released a briefing explaining the value of public involvement in the HRA and INVOLVE have previously released a briefing explaining the value of public involvement in the decision management conduct and discount in the value of public involvement in the pub the design, management, conduct and dissemination of research. Excellent public involvement is essential and has been shown to improve the quality and impact of health and social care research and about in the decign change will halo operate that your receases in for and about in the decign change will halo operate that your receases in for and about in the decign change. essential and has been shown to improve the quality and impact of health and social care research? A. Involving people who your research is for and about in the design stage, will help ensure that your analysis of the second stage. 4. Involving people who your research is not and about in the design stage, will help ensure that your research is accessible to everyone. The four principles for meaningful involvement of patients and the research is accessible to everyone. The four principles for meaningful involvement of patients and the research is accessible to everyone. The four principles for meaningful involvement of patients and the research is accessible to everyone. The four principles on best practice for nublic involvement. public in health and social care also provides guidance on best practice for public involvement.

The following are examples of groups or factors you should consider when developing a Plan (this is not an exhauctive lich). The NIUD INCLUDE project also are examples of groups or factors you should consider when developing a Plan (this is not an exhauctive lich). The NIUD INCLUDE project also are examples of groups or factors you should consider when developing a Plan (this is not an exhauctive lich). an exhaustive list). The NHR-INCLUDE project also provides examples of groups that may be underan exhaustive list). The NIFIK-INCLUUL project also provides examples of groups that may be underserved. You are not expected to served. These lists are to support you in considering who may be under-served. You are not expected to make reference to support you in considering who may be under-served.

make reference to every group listed in your Plan.

"Guidance for developing and submitting an Inclusion and Diversity Plan – second draft", published 13 May 2025



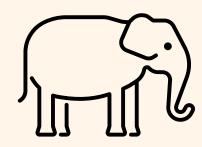






In early 2025, the FDA quietly removed its draft guidance on enhancing diversity in clinical trials. This regulatory shift raises concerns about the future of inclusive research practices and their impact on equitable healthcare outcomes.

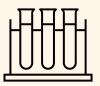
While the FDA's withdrawal of DEI guidance in 2025 was unexpected, the pursuit of diversity in clinical trials remains a scientific imperative, regardless of shifting political landscapes.









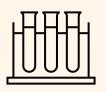














EMBEDDING DIVERSITY IN RESEARCH LEADERSHIP

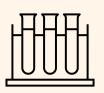
Diversity within research teams is essential for driving meaningful DEI initiatives in clinical trials.

Diverse leadership fosters broader perspectives and more representative decisionmaking, helping to identify and address blind spots in trial design and execution. Build trust and credibility, people are more inclined to trust leaders who resemble them











UPDATE MANDATES AND DOCUMENTATION

Current diversity planning and demographic reporting rely on a narrow set of self-identified race and ethnicity categories that are shaped by socio-geographic constructs rather than scientific constructs.

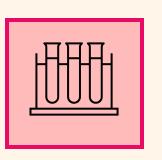
This approach can oversimplify complex identities and limit the accuracy of data used to assess representation.

More nuanced frameworks are needed, such as incorporating intersectional data, using granular ethnicity classifications and applying genomic ancestry markers where appropriate to complement self-reported data











EARLY DIAGNOSIS AND RESEARCH INITIATIVES

Earlier diagnosis of disease also plays a vital role in improving DEI in clinical trials. When individuals are diagnosed sooner, they are more likely to be identified and recruited for research opportunities

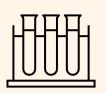
Earlier diagnosis enables trials to better reflect the real-world patient population, leading to more inclusive study designs and more generalizable results.

By ensuring that diverse groups are represented from the outset, clinical research becomes more equitable, more relevant, and ultimately more impactful for all communities.











EMBEDDING EQUALITY: INCLUDE ETHINICITY FRAMEWORK

Addresses a critical gap in clinical research: the underrepresentation of ethnic minority groups in trials

The Framework encourages trialists to move beyond participant numbers and consider who is included and why

Who should my trial apply to?

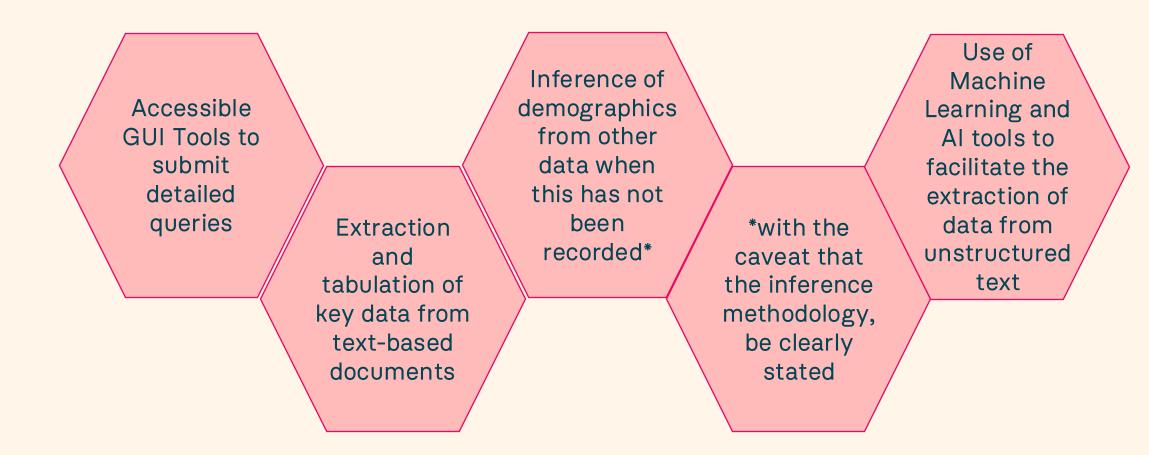
Are the groups identified likely to respond in different ways?

Will my study intervention make it harder for some groups to engage?

Will the way I have designed the study make it harder for some groups to engage?



THE ACCESSIBILITY AND USABILITY OF PUBLIC CLINICAL TRIAL DATASETS





Conclusion

If our science doesn't reflect everyone, represent everyone, who are we actually healing?



Acknowledgements

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Questions?

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