

NAVAL MEDICAL RESEARCH UNIT NO. 4  
GREAT LAKES, ILLINOIS 60088

IN REPLY REFER TO:

NAMRU-4:CHM:ak  
3900  
31 Aug 1972

From: Commanding Officer, Naval Medical Research Unit No. 4  
Great Lakes, Illinois 60088  
To: Chief, Bureau of Medicine and Surgery (Code 71)  
Navy Department, Washington, D. C. 20390  
Subj: CNAVINST 3900.39, Use of Volunteers as Subjects in Research,  
Development, Test & Evaluation; revision of

Re: a) BUMED ltr BUMED:71-2:CWB:ac; 3900 of 3 Aug 1972

1. Reference (a) requested comments relative to revision of the current subject instruction.

2. The following questions/comments are submitted for consideration:

a. When does Chief of Naval Training fit in "chain of command" if SECNAV permission required? *When his men are subjects*

b. The current instruction does not specifically address the "rights" of subjects in "non-hazardous" studies, i.e. - most vaccine evaluations and mass chemoprophylactic studies. *purposefully separate hazardous and non-hazardous*

c. Should "legal capacity" be defined in view of federal voting age, actions of several states? *- No - Sec Nav Inst should not attempt to define*

d. It is suggested that investigator indicate "hazard or non-hazard" on new protocol submitted and that approval letter indicate specific concurrence of "hazard or non-hazard."

e. Any committee independent of investigator should probably be in Bureau; however, in my opinion, local Research Committee is adequate. It might be advisable to indicate that when a "hazardous" study is undertaken, that the local Review Committee be expanded to include non-scientists, i.e., legal officer, Chaplain, administrative officer.

*C. H. Miller*  
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