



FOR US POSTAL SERVICE DELIVERY:

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July 13, 2000

Eric Gislason, Ph.D.
Interim Vice Chancellor for Research
Office of the Vice Chancellor for Research (MC 672)
University of Illinois at Chicago
310 Administrative Office Building
1737 West Polk Street
Chicago, Illinois 60612-7227

**RE: Human Research Subject Protections Under Multiple Project Assurance
(MPA) M-1095 – Research Activities Involving The University of Illinois at Chicago
(UIC) Department of Psychology Subject Pool**

Dear Dr. Gislason:

The Office for Protection from Research Risks (OPRR) has reviewed your May 15, 2000 and July 10, 2000 letters responding to allegations of noncompliance with Department of Health and Human Services (HHS) regulations for the protection of human research subjects (45 CFR Part 46), involving the above-referenced research. The allegations, identified by OPRR in its letter to you of March 12, 2000, concerned:

- (1) Failure to seek consent for participation in human subject research under circumstances that provide the prospective subject sufficient opportunity to consider whether or not to participate in the research, and that minimize the possibility of coercion or undue influence, as required under HHS regulations at 45 CFR 46.116.
- (2) Failure to disclose, in a timely and reasonable manner, appropriate alternatives to research participation that might be advantageous to subjects, as required under HHS regulations at 45 CFR 46.116(a)(4).

Your letters indicate that UIC found the above allegations to be largely supported and as a result, suspended the research utilizing the UIC Department of Psychology Subject Pool. In addition, UIC took the following corrective actions to modify the subject pool policy:

1. In response to UIC's finding that alternatives to human subject research participation (i.e.,

writing summaries of published empirical research or serving as a client in simulations) were not adequately presented to Psychology 100 students until six weeks after students were notified that the Psychology Experience Credit (PEC) requirement could be fulfilled by participating in a human subject pool, the Department modified its plan for the dissemination of information about the PEC requirement to Psychology 100 students. Information about alternatives to participation in the human subject pool will now be presented in full detail when the PEC is initially explained and the option to fulfill the requirement through participation in the human subject pool is first offered.

2. In response to UIC's finding that the possible benefits to Psychology 100 students from participating in the human subject pool may be overstated in documents provided to potential human subjects, consent documents were revised to de-emphasize the previous assertion that subjects will benefit directly through research participation.

3. In response to UIC's finding that requiring subjects to supply their social security numbers when signing up for research participation jeopardizes subjects' privacy, each Psychology 100 student will be assigned a unique identifier to be utilized if the student signs up for a research study, which will be maintained in a locked box in the Psychology Department office.

Based upon the above corrective actions, there should be no need for further involvement of OHRP in this matter. Of course, OHRP must be notified should new information be identified which might alter this determination.

OHRP appreciates the continued commitment of your institution to the protection of human research subjects. Please do not hesitate to contact me should you have any questions.

Sincerely,



Carol J. Weil, J.D.
Compliance Oversight Coordinator
Compliance Oversight Branch
Division of Human Subject Protections

cc: Dr. Clyde W. Wheeler, UIC
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Dr. Katherine Duncan, OHRP

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