

The Board of the Society of Correctional Physicians endorses the recommendations of the Committee on Ethical Considerations for Revisions to DHHS Regulations for Protection of Prisoners Involved in Research.

As a group of physicians practicing medicine behind bars, our primary concern is the health and safety of our patients. As the Committee notes, we serve a vulnerable population with limited autonomy in an inherently coercive environment. Given historical abuses, research on these patients has been appropriately restricted in the recent past.

With recent advances in HIV care and hoped-for advances in other areas, including hepatitis C eradication treatment, we see great value in the work you have done in providing a new framework for inmate research.

Protection for our patients should be meaningful, substantial, and carefully considered. Both undue inducement and implied coercion are problematic for research subjects in a correctional health care environment. This factor is an essential consideration.

We applaud the recommended protections, including the Prison Research Subject Advocate and Collaborative Responsibility. Among other recommendations, the high proportion of non-prisoner participants (where applicable) is particularly valuable. We agree that prompt access to adequate medical care is always essential.

We acknowledge and support the work of Jeffrey Metzner, MD, a member of SCP, on your committee. We consider him as our liaison to the Committee. Please feel free to contact us for additional input through Dr. Metzner.