

DDA MEMORANDUM SEEKS TO:

- I. REDUCE UNCERTAINTIES CONCERNING POSSIBILITIES OF UNDISCOVERED DRUG RESEARCH PROJECTS
- II. IDENTIFY AND NOTIFY UNKNOWNING TEST SUBJECTS POSSIBLY SUFFERING ADVERSE EFFECTS
- III. NOTIFY JUNE 1973 TEST SUBJECTS
- IV. OBTAIN PHARMACOLOGICAL EVALUATION OF EA 3167 AND HAVE IT CONFIRMED BY QMS.

I. REDUCE UNCERTAINTIES CONCERNING POSSIBILITIES OF UNDISCOVERED DRUG RESEARCH PROJECTS

ACTION REQUESTED: Describe searches and degree of certainty

A. Description - ORD has searched files repeatedly in response to:

- DCI call for possibly questionable activities
- Rockefeller Commission
- Senate Select Committee (Church)
- House Select Committee (Pike)
- Senate Subcommittee on Health and Scientific Research (Kennedy)
- FOIA requests - past searches and a current one involving document-by-document review of some 130 boxes of files for Behavioral Research activities (Marks)
- Review of all Records Center holdings (June 1978)

B. Findings - ORD Projects OFTEN/CHICKWIT involved drug research

C. Conclusion - Confident that no programs are undiscovered; possibly but not likely, that a very few individual documents have escaped detection.

II. IDENTIFY AND NOTIFY UNKNOWNING TEST SUBJECTS POSSIBLY SUFFERING ADVERSE EFFECTS

ACTION REQUESTED:

Identify and notify subjects -- regardless of who may have been responsible for human testing of EA 3167, the government has an obligation to inform subjects

A. Background - ORD drug research involved the OFTEN/CHICKWIT programs

1. CHICKWIT - FY-68 - Jan 73: To collect information and samples of new drugs in [REDACTED] and [REDACTED] (no testing)
2. OFTEN - FY-66 - Jan 73: To test effects of drugs
 - a. Animal Tests: FY-66 - Jan 73 at Woodward Research Laboratories, Edgewood, FY 71-Jan 73
 - b. Human Testing: Planned at Edgewood, \$37,000 by ORD to test one Glycolate class chemical, EA 3167

(1) Documented Evidence:

(a) Definitive:

Chief, Medical Research Division, Biomedical Laboratories, Edgewood Arsenal. "[REDACTED] was positive that no work on human subjects was performed under the contract with the Agency." ([REDACTED], Feb 1975).

(b) Ambiguous:

ORD Div Chief Memo May 73 ([REDACTED]) "Twenty human volunteer subjects, five prisoners (Holmesburg State Prison, Holmesburg, Pa.) and fifteen military volunteers in the Edgewood program, were tested. Both the oral and transdermal routes were found to be effective with symptoms lasting up to six weeks. "Agency support of both clinical testing of EA 3167 and of the collection of information on and samples of foreign developments was terminated in January 1973" ... "Expenditures for the human testing program were gradually reduced as subjects were cleared from the program during the necessary post test follow-up observational and examination period."

(2) Undocumented Evidence: Institutional memory - opinions of those not directly involved but peripherally aware: project terminated before planned human test occurred.

B. Findings -- Sponsorship of tests on human volunteers is ambiguous

-- Test subjects were volunteers

-- There was medical follow-up

-- Agency sponsorship of EA 3167 tests ended in January 1973

-- No EA 3167 human test subject names found in ORD records

C. Conclusions

-- Although records concerning the sponsorship of the human testing are ambiguous, [REDACTED] certainty that no human tests were done under Agency contract leads to the conclusion that the planned, Agency-sponsored, testing of EA 3167 on human volunteers had not occurred by the time the program was terminated in January 1973.

-- Edgewood was involved in testing EA 3167 on human volunteers before the 1971 Agency transfer of \$37,000 to Edgewood.

-- The human subjects apparently were volunteers who were given post-test follow-up examinations.

-- We have nothing by which to identify subjects, thus identities and aid in locating would have to come from Edgewood.

-- Question remaining regarding appropriateness of our tracking this initiative in view of doubtful involvement.

III. FIND AND INFORM THE JUNE 1973 TEST SUBJECTS

ACTION REQUESTED: Notify June 1973 test subjects

A. Findings -- No information on these tests was surfaced in any of our searches

-- Our first knowledge of the tests came on 15 September 1977 during a review and index of materials being prepared by the DOD for submission to the Senate Subcommittee on Health and Scientific Research on 21 September 1977.

-- The Army IG document from which we gained our first knowledge of the Jan 73 test and which was quoted by DCI to Senator Kennedy says "In June 1973, two military volunteers were tested at EARL with EA 3167 but these tests were funded by the Army RDTE funds and were not connected in any way with the CIA project."

B. Conclusion -- Notification of test subjects by CIA is not possible with information available to us; only Edgewood could identify.

IV. OBTAIN PHARMACOLOGICAL EVALUATION OF EA 3167 AND HAVE IT CONFIRMED BY OMS

ACTION REQUESTED: Obtain a pharmacological evaluation of potential long-term after-effects on EA 3167; get OMS confirmation.

- A. Findings -- ORD has insufficient data and does not have the competence to make a pharmacological evaluation of EA 3167
- Unlikely OMS could confirm an evaluation since EA 3167 is an Edgewood-developed Glycolate class chemical.
- B. Conclusion -- Any such evaluation would have to come from Edgewood

V. ALTERNATIVE COURSES OF ACTION

- A. Contact Edgewood to seek requested information.
- B. Contact ex-employees for depositions concerning their knowledge and recollection.
- C. Encourage Secretary of Army to identify, notify and insure medical follow-up as necessary based upon Edgewood data and pharmacological evaluation.