



UNITED STATES MARINE CORPS
TRAINING AND EDUCATION COMMAND
2007 ELLIOT ROAD
QUANTICO, VIRGINIA 22134

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HRPP
01 Oct 25

USMC HUMAN RESEARCH PROTECTION PROGRAM POLICY LETTER 1-25

From: USMC Human Research Protection Program (HRPP) Institutional Official
To: Distribution List

Subj: INTERIM CHANGES TO THE USMC HRPP POLICY AND PROCEDURES

Ref: (a) USMC HRPP Policy and Procedures
(b) MCO 3900.18

Encl: (1) USMC HRPP Interim Policy Changes (HRPP Consolidation)

1. Situation. As of 01 Oct 2025, the Manpower and Reserve Affairs (M&RA) HRPP and Systems Command (MCSC) HRPP were consolidated into the USMC HRPP. The consolidation necessitates administrative changes to reference (a).

2. Cancellation. Omitted.

3. Mission. The USMC HRPP updates reference (a) to address changes related to the consolidation of the M&RA and MCSC HRPPs into the USMC HRPP and to address other necessary changes.

4. Execution

a. Commander's Intent and Concept of Operations

(1) Commander's Intent. All USMC commands and all external organizations using USMC HRPP services in accordance with reference (b) shall follow reference (a) with the amendments covered in enclosure 1.

(2) Concept of Operations. Omitted.

b. Subordinate Element Missions. Omitted.

5. Administration and Logistics. The USMC HRPP is the point of contact for all HRPP matters in the USMC. Questions may be directed to smb_usmc_hrpp@usmc.mil.

6. Command and Signal

a. Command. This policy letter is applicable to all USMC commands and all external organizations using USMC HRPP services in accordance with reference (b).

b. Signal. This policy letter is effective the date signed.

A. J. GRECO JR.
INSTITUTIONAL OFFICIAL

INTERIM CHANGES TO THE USMC HRPP POLICY AND PROCEDURES
Enclosure 1

The following administrative changes to the USMC Human Research Protection Program (HRPP) Policy and Procedures are made to address the consolidation of the Manpower and Reserve Affairs (M&RA) HRPP and Systems Command (MCSC) HRPP into the USMC HRPP. The changes will be integrated in the main body of the Policy and Procedures during the next update.

General.

Sections of the Policy and Procedures referencing other Marine Corps HRPPs or their processes that are not addressed below shall be brought to the attention of the USMC HRPP. In such cases, the USMC HRPP will provide supplemental guidance.

Chapter 3: Organization, Authority, and Delegation.

3.1: Human Research Protection Organization in the USMC

- Paragraph 1. The following sentence is struck: "Figure 3-1 illustrates the service structure."
- Paragraphs 3 and 4 are replaced with:
 - The USMC currently has a single HRPP and a single IRB. All USMC commands fall under the USMC HRPP's assurance and this Policy and Procedures. All external projects involving USMC support (funding) or assistance (access to USMC personnel as participants or subjects or access to USMC personnel's information) must follow reference (t) and this Policy and Procedures.
- Figure 3-1. Marine Corps Human Research Protection (HRP) Organizational Structure is struck.

3.2: USMC HRPP Human Protections Director and other Staff

- Paragraph 1. The following sentence is added after the first sentence. "Additional HRPP points of contact may be designated by or with the concurrence of the USMC HRPP's Institutional Official."

Chapter 4: USMC Institutional Official and IRB Roles and Responsibilities

4.2 USMC Institutional Official

The following is added to this section: The USMC HRPP may appoint Alternate Institutional Officials (AIO) as needed to meet the needs of the service. AIO shall complete and maintain required training. AIOs shall be authorized to review non-exempt research as indicated above when such responsibilities are delegated to them by the USMC IO to cover periods of unavailability or for other reasons, such as expertise or equities at an AIO's command. AIO also shall be authorized to approve Institutional Agreements for Institutional Review Board Review (IAIR) and Individual Investigator Agreements (IIA) between the USMC HRPP and other institutions. Such delegations may be made verbally or in writing and, at the discretion of the discretion of the USMC IO in cases of command expertise or equities, may be standing delegations.

AIOs may not perform other duties of the USMC IO, such as making appointments or establishing policy, unless specifically authorized in writing by the USMC IO.

If the USMC IO is unexpectedly unavailable and unable to delegate responsibilities, an AIO carry out IO duties as needed to ensure the smooth operation of the USMC HRPP. In such cases, the USMC HRPP shall notify DON HRPP.

Chapter 14: Research That Meets Criteria for Exemption.

14.1: EDO Role and IRB Oversight

- Paragraphs 3 and 4 are struck.
- Paragraph 5. The following phrase is struck: "(within their own IA or, if cross-appointed and if requested, within other IAs)"

14.2: Initial Submission Requirements and Approval Process

- Paragraph 1 (NOTE) is struck.
- Paragraph 5. The phrase, "their organization's EDO," is replaced with, "an EDO."

Chapter 22: Review of Projects by External/Extramural Individuals and Organizations.

- Paragraph 1. The following sentence is struck: "The only exceptions to this are projects funded by M&RA or MCSC, which are reviewed by the HRPOs in those organizations."
- Paragraph 5. The following sentences are struck: "If the project is funded by Manpower and Reserve Affairs (M&RA) or Systems Command (MCSC), this review is conducted by the HRPO in the funding organization. If the funding is from any other USMC source, the review is conducted by a HRPO within the USMC HRPP."

22.1: Projects Funded by the USMC (USMC Supported): HRPO Review

- Paragraphs 1 and 2. The phrase "the appropriate HRPO," is replaced by, "a HRPO in the USMC HRPP."
- Paragraph 3. The phrase "USMC, M&RA, or MCSC HRPP," is replaced by, "USMC HRPP."
- Paragraph 4. The following phrase is struck: "For HRPO reviews conducted by the USMC HRPP."

Chapter 23: Collaborative Research.

23.3: Collaborative Effort with an Associate Investigator Not Affiliated with the Marine Corps

- Paragraph 2. The phrase, "one of the Marine Corps' three HRPPs," is replaced by, "the USMC HRPP."

Chapter 25: Records Retentionⁱ

Introduction

- Add the following after the last paragraph. The retention schedules listed below are baseline requirements. Longer retention is authorized as needed for program reference or to align with the administrative schedules and priorities of the HRPP. The USMC IO may determine that a record has historical significance and direct permanent retention under schedule 3000-22 of reference (m) or long-term retention under other schedules or by transfer to USMC History Division. The process for determining historical significance shall be established in a separate HRPP guideline.

25.2 USMC IRB Responsibilities

- 1. Replace last sentence with, "To facilitate DON HRPP inspections and comply with reference (m) the IRB shall retain all records required under references (b), (d), and (e) for five years under schedule 5000-66 of reference (m). After five years, copies of reviews and acknowledgments, IRB meeting minutes, and any other records as directed by the IO or Chair shall be retained for 10 years under schedule 5000-55 of reference (m)."
- 2. In last sentence, replace "transfer to NARA." with "IO-designated long-term or permanent retention or transfer outside the HRPP."

- 3. Delete section.

25.3 USMC HRPP Responsibilities

- 1. Replace last two sentences with, "To facilitate DON HRPP inspections and comply with reference (m) the HRPP shall retain all assurance records required under references (b), (d), and (e) for five years under schedule 5000-66 of reference (m). After five years, records of assurance renewals and any other records as directed by the IO or Chair shall be retained for 10 years under schedule 5000-55 of reference (m)."
- 2. Replace last two sentences with, "To facilitate DON HRPP inspections and comply with reference (m) the HRPP shall retain all records of appointments required under references (b), (d), and (e), other than those included in assurance records, for five years under schedule 5000-66 of reference (m)."

Appendix G: Process for Delegation of Authorities and Responsibilities.

- 3. The following phrase is struck: "or to a HRPO in any of the service's HRPPs."
- 5. The following sentence is struck: "EDOs and HRPOs from M&RA and Systems Command who have been cross-appointed to the USMC institutional assurance may perform EDO and HRPO duties for the USMC HRPP."

Appendix H USMC HRPP Records Retention Checklist

- In header of third column, remove "per reference (m)" and replace with "per Ch 25."

Appendix J: Data Projects, Data Requests, and Data Sharing Agreements.

Scope of this guidance. Paragraph 2. The phrase, "The M&RA HRPP or MCSC HRPP," is replaced by, "Commands."

ⁱ Retention of paper copies of records that have been digitized was not addressed in the Oct 2024 Policy and Procedures due to ongoing questions regarding NARA policy on such paper copies. With the changes in this interim policy, NARA transfer is no longer required. The USMC HRPP will destroy paper copies of records that have been digitized when program time allows.