

Dallas County Juvenile Department
Research and Statistics
Policy Concerning External Research Requests

I.
Purpose

The Dallas County Juvenile Department (hereafter, DCJD) recognizes, acknowledges, advocates, and encourages all levels of research that ultimately increases and contributes to both the academic scholarship and operational knowledge-base regarding juvenile justice populations. However, in keeping with federal standards and regulations for conducting research on human subjects (HHS, 45 CFR 46), the DCJD has developed a comprehensive system, policy, and procedure for managing requests from external sources. The youth who are under the authority of the DCJD are regarded as children by the National Institutes of Health and by federal regulation. Such a designation requires the recognition that said youth are considered a protected class under human subjects protection guidelines.

The projects that fall under the authority of this policy will be reviewed in accordance with the current guidance as set forth herein. Any and all projects will be evaluated on their own merit but must demonstrate considerable practicable applications to Departmental operations and/or to the general knowledge of the target population. By necessity, the proposed project must observe and respect that the use of Departmental resources such as employee time and expertise, cooperation and coordination, and general guidance will be required. However, such demands should remain reasonable and otherwise relatively free of both perceived and real logistical difficulties and concerns for the DCJD employees and units taxed with providing support for the external research.

Additionally, research proposals to be submitted under this policy must be high quality and free of fatal flaws. The expectation is that the supporting methodology should demonstrate considerable rigor, not only in regard to sampling and design, but in the analytic and statistical plan for quantitative projects, and in grounded theory for qualitative projects. The DCJD has established high expectations for objective, scientific reporting, and pursuant to this ideal, should not be unnecessarily subjected to undue criticism. However, constructive criticism within the appropriate forum and venue is both reasonable and expected. Violating this mandate can and will be sufficient grounds to bar the requestor/PI and corresponding agency from participating in external research with the DCJD in the future.

All heretofore external research guidelines are revoked and void. In some cases, new research proposals may refer to prior guidelines but only for information or context purposes. All proposals submitted after this policy is adopted as indicated by the date in the footer section must comply with the guidelines herein.

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**II.
Definitions**

In order to standardize the language used in the formal publication of this policy as it pertains to research methodology and analysis, the following definitions for commonly used terms are provided.

External Research – Any and all investigative projects and/or activities that emanate from an independent source to the Dallas County Juvenile Department that have the basic attributes of data analysis (i.e., research methodology) and research-related work that seek to understand phenomena as it pertains to juvenile justice populations.

Primary Research – Primary research is ANY kind of research that is collected by the principal researcher or any of his/her assigns¹. One of the primary elements distinguishing primary research from other kinds of research is that new data is collected independently of any data that has already been collected or is being collected as a part of an ongoing process or procedure for the agency or entity. The research can be of any form including surveys, assessments, observations, and interviews, to name a few.

Secondary Research – Secondary research is research that is conducted with data that have already been collected. The distinguishing feature of secondary data, irrespective of any subsequent new variable creation from the existing original variables, is that the data already exist and does not require any additional interactions with the original participants of the research. Secondary research typically represents less risk to participants than primary research.

Archival Data – data collected by “others” for operational and reporting purposes of the entity but which may also be subject to systematic study. By definition it is data that already exists and any prospective use of these data, including the construction of new measures and variables by using the existing data, are also regarded as archival data.

Institutional Review Board – Commonly referred to as the IRB, this entity is generally an integral part of a university with members who are appointed annually and having the authority to review, approve, disapprove, or require changes to primary and other research and related activities being conducted involving human participants. The IRB determines whether proposed research should be subjected to *minimal review*; *expedited review*; or *full review*. Each kind of review has its own set of criteria and requirements.

Child – A person who has not attained the legal age of consent to treatment or procedures in the research under applicable laws of the jurisdiction in which the research will be conducted.

¹ In the context of research as delineated in this policy, the word “assigns” refers to any individual who may be acting as the representative and/or agent of the PI/co-PI, including graduate and undergraduate students, research assistants and associates; faculty and/or staff employees of the university or entity where the research has been, is, or will be conducted; or any other designee of the PI/co-PI.

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Minimal Risk Research – Research in which the probability and magnitude of harm or discomfort anticipated in the research are not greater in and of themselves than those ordinarily encountered in daily life (of normal subjects/participants) or during the performance of routine physical or psychological examinations or tests.

Assent – A child’s affirmative agreement to participate in the research. Mere failure to object should not, absent affirmative agreement, be construed as assent.

Consent/Permission – The agreement of the parent(s), caregiver(s); and/or guardian(s) to the participation of their child or ward in the research.

Parent – A child’s biological or adoptive parent.

Guardian – An individual who is authorized under applicable State or local law to consent on behalf of a child to general medical care.

Intervention – physical procedures by which data are collected as well as manipulations of the participant or participant’s environment performed for research purposes

Interaction – communication and/or interpersonal contact between the researcher/investigator, his or her assigns, and the participant.

Private Information – information about behavior that occurs in a context in which an individual can reasonably expect that no observation or recording is taking place, and information that has been provided by an individual and that the individual can reasonably expect will not be made public (e.g., medical diagnoses, etc.).

Identifiable Private Information – private information for which the certain identity of the individual [participant] is or may be readily associated with the information collected/obtained by the researcher/investigator.

Mental Health – The mental health of an individual is a broad construct that includes a constellation of subtopics that generally refer to cognitive and behavioral functioning. Some subtopics include depression, anxiety, bipolar disorder, developmental delays, schizoaffective disorder, autism spectrum disorder, and many others. Personality disorders can also be included under mental health.

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**III.
Research Determination**

An External Research Request is a specific research matter that must begin with the Research and Statistics department of the DCJD. The requestor (i.e., Principal Investigator, PI) **MUST** make the request through the DCJD Manager of Research and Statistics. The requestor or PI is encumbered with determining the type of research being requested and following the policy and guidelines governing the research. The following is offered as a guide that conforms to the United States Code of Federal Regulations (specifically, 45 CFR 46) regarding research and human subjects protections.

1. The first question that must be addressed is whether the project qualifies as research. Under 45 CFR 46, research is defined as a “*systematic investigation, including research development, testing, and evaluation, designed to develop or contribute to generalizable knowledge.*” All projects that meet this definition qualify as research under this policy. If the answer is “yes” to this question, then proceed to #2 of this subsection.
2. The second question that must be addressed is whether the project will rely on human subjects for the data that will be analyzed under the project’s title. Federal rules recognize two definitions for human subjects. Under the Department of Health and Human Services, a human subject is an individual about whom a researcher/investigator engaging in the research enterprise:
 - a. obtains information, including biospecimens, through intervention or interaction with the individual, and uses, studies, or analyzes the information or biospecimens; or
 - b. obtains, uses, studies, analyzes, or generates identifiable private information or identifiable biospecimens

Under the Food and Drug Administration, a human subject is defined as an individual who is or becomes a participant in research, either as a recipient of the test condition or as a control. S/he can be a healthy individual or a patient. Answering “no” to either question above may indicate that the proposed project does not correspond with human subjects research. Please contact the Manager of Research and Statistics for guidance on the project.

The requestor/PI is responsible for all data collection, security, and management throughout the entirety of the project life cycle, observing all regulations governing the security and confidentiality of all research participants. All individual-level records must be deidentified with no future means of identification.

A. Special Initiatives and Requests

A special initiative or request is a departure from standard external research requests. These projects are distinguished by a need for a long-term commitment (i.e., more than one year) and collaboration between the DCJD and the requestor or PI. The researchers for these projects may also be seeking to provide a specialized intervention to youth under the

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authority of the DCJD and may have considerable grant funding in order to execute an experimental design using random assignment or something closely resembling such a design. The scientific merit of such a request is applauded; however, approval is limited because of the significant resources and time commitment that typically accompany such a project.

1. Special Initiatives and Requests **MUST** be vetted by designated members of the leadership executive team which can include, the DCJD Executive Director, Assistant Director, Deputy Director of Executive and Administration Services, Deputy Director of Probation Services, Deputy Director of Clinical Services; Deputy Director of Educational Services, Deputy Director of Institutional Services, and Deputy Director of Residential Services.
 - a. **A Special Initiative and Requests Application** is generally originated by an executive team member.
 - b. The DCJD Executive Director reserves the right to request a pre-proposal outlining the research request.
 - c. The DCJD Executive Director reserves the right to have the pre-proposal reviewed by a designee.
 - d. The PI/requestor should be prepared to make a presentation and respond to questions and concerns.
 - e. A favorable decision is not guaranteed to the PI/requestor making a presentation of the proposed research.
 - f. The PI/requestor will be informed of a decision within two weeks (i.e., 10 business days) of the presentation.
2. A favorable decision to move forward will necessarily classify the research request as primary research and will proceed accordingly.
3. A negative decision at this stage will terminate further proceedings for the research proposal and the request will be considered **CLOSED** with no further action. However, if the requestor believes a modification would change the outcome, s/he is invited to make changes to the proposal and resubmit.

B. Primary Research

If the requestor or PI has determined that the research is primary in character, or a favorable decision was rendered under Section A above, then the following guidelines apply:

1. Requestor must submit the following materials as part of a comprehensive **External Research Request** packet:
 - a. **Application to Conduct Research (External) with the DCJD**
 - b. **The Institutional Review Board [pending] approval of the project**
 - i. Conditional approval of the project can be granted with pending IRB approval, but the final IRB approval **MUST** be submitted immediately upon the approval being granted.
 - c. **One-page executive summary of the research proposal**

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- d. **Curriculum Vitae (CV) for all principal researcher(s)**
 - i. Principal Investigator and Co-Principal Investigator;
 - ii. A PI who is a graduate student with a supervising professor will need to provide the CV of a faculty sponsor;
 - iii. Other personnel named as part of the project may be required to provide a CV upon request.
 - e. **A copy of the IRB-stamped consent and assent form**
2. Research Review Committee
 - a. Once all materials have been submitted, the Research Review Committee (hereafter, RRC) will convene with the primary purpose to **APPROVE** or **REJECT** the submitted proposal.
 - b. All materials will be distributed to each committee member for individual review prior to the scheduled RRC meeting.
 - c. Within 30 days of the submission, the RRC will meet, deliberate the merits of the request, and vote on the request.
 3. Research Proposal is Approved
 - a. **APPROVAL** of the project by the RRC is **required** in order for it to be considered by the Juvenile Board.
 - b. **REJECTION** of the project by the RRC will necessarily interfere with the review process and it will not be considered by the Juvenile Board until the RRC renders a favorable outcome.
 - c. In the event the requestor or PIs proposal is approved, key personnel who will administer the project and provide oversight will meet to discuss all key operational and research elements such as access to youth, consent/assent; safety; confidentiality and safeguarding of sensitive information; deidentification process, and names and contact information. This information may be required by the Juvenile Board.
 - d. At a minimum, one key individual from the DCJD and one key individual from the research project will meet on a monthly basis for adjustments and updates.
 4. Research Protocol Modifications
 - a. In the event a modification to the research plan is necessary, the requestor or PI will notify the Manager of Research and Statistics, **IN WRITING**. The notification must have sufficient detail to explain the impetus for the change, and how the proposed changes will remedy the identified issue.
 - b. Major modifications to the research protocol require IRB approval. The IRB approval should accompany the written notice outlined in 4a above.
 - c. A major modification of the research project may cause the research operations to be suspended pending a review of the practices and procedures. The requestor, PI, or co-PI will be encumbered with providing a comprehensive report that adequately addresses the issues requiring the project to be modified.

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C. Secondary Research (Data Analysis)

If the requestor or PI has determined that the research is secondary data analysis, then the following guidelines apply:

1. Requestor must submit the following materials as part of a comprehensive **External Research Request** packet:
 - a. **Application to Conduct Research (External) with the DCJD**
 - b. **The Institutional Review Board [pending] approval of the project**
 - i. Conditional approval for the project can be granted with pending IRB approval, but the final IRB approval **MUST** be submitted immediately upon the approval being granted.
 - c. **One-page executive summary of the research proposal**
 - d. **Curriculum Vitae for all principal researcher(s)**
 - i. Principal Investigator and Co-Principal Investigator
 - ii. Personnel named as part of the project may be required to provide a CV.
 - e. **A copy of the IRB-stamped consent and assent form**
2. A review of the application and executive summary will be completed by the DCJD Research and Statistics unit in coordination with the Deputy Director for Administrative and Executive Services.
3. Research Review Committee
 - a. Once all materials have been submitted, the RRC will convene with the primary purpose to **APPROVE** or **REJECT** the submitted proposal.
 - b. All materials will be distributed to each committee member for individual review prior to the scheduled RRC meeting.
 - c. Within 30 days of the submission, the RRC will meet, deliberate the merits of the request, and vote on the request.
4. Notice of **APPROVAL** or **REJECTION** shall be provided to the requestor/PI within 30 days of the research proposal submission.
5. If the research application is **APPROVED**, the request will be docketed on the Juvenile Board meeting agenda. The timeframe will coincide with the Juvenile Board meeting schedule.
6. If the application is **REJECTED**, the requestor/PI can resubmit the application with modifications for the RRC to reconsider.
7. Although secondary research using archival data is generally regarded as minimal risk to the participants who provided the data, there remains an overarching expectation by the DCJD that the research be held to a high standard in regard to the research questions being asked, the hypotheses generated using prior research as the foundation, and the methodological rigor to address the research questions.

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IV.
Research Review Committee

The Research Review Committee (RRC) is a panel of senior-level staff appointed annually. The panel is comprised of five individuals based on rank and position within the DCJD. The permanent appointments consist of the Deputy Director for Administrative and Executive Services; the Manager of Research and Statistics; and an additional staff member from the Research and Statistics Unit. The rotating appointments consist of two individuals in the grade of supervisor and above. One such appointment shall be the deputy director responsible for the division particularly impacted by the proposed research. The second rotating appointment shall be made by the said deputy director for the division particularly impacted by the proposed research.

The RRC is encumbered with the duty to review and evaluate all external research projects that fall under Section III above.

At a minimum, the evaluation process will take thirty (30) days but could take longer, depending on the nature of the research project. All proposals will have a decision within ninety (90) days after the initial, completed DCJD External Research Request application is received. The requestor/PI of the proposed project will be duly notified of the RRC decision (either **APPROVED** or **REJECTED**) once the review has been completed.

The approval of the project by the RRC is a conditional approval of the External Research Request for the project. The final approval rests with the Dallas County Juvenile Board. Because of this, no element of the proposed research may begin until written authorization of the approved project has been rendered by the Dallas County Juvenile Board. Final IRB approval must be submitted prior to the project being placed on the Dallas County Juvenile Board agenda.

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V.
Final Decision

A. Dallas County Juvenile Board

The Dallas County Juvenile Board (hereafter, DCJB) is an entity comprised of several ranking officials from Dallas County Government and includes the County Judge, County Commissioner, Youth Services Advisory Board Chair, and several members of the judiciary.

1. Final approval of the project rests solely with the Dallas County Juvenile Board but **MUST** be preceded by a favorable decision (i.e., **APPROVED**) by the RRC.
2. The proposed research will be submitted and presented to the Juvenile Board as an agenda item.
3. Once confirmation is provided that the External Research Request (i.e., the research proposal) has been docketed, the requestor/PI will be notified.
4. The requestor/PI **MUST** attend the Juvenile Board meeting at which the research proposal is docketed. During this meeting, the requestor/PI must be prepared to respond to and address any questions, issues, and concerns identified by any board members.
Note: failure to attend the board meeting will result in an automatic REJECTION of the project.

B. Final Approval

1. A decision rendered by the Dallas County Juvenile Board is a **FINAL** decision regarding the research project and External Research Request.
2. Upon **APPROVAL** by the Juvenile Board, all personnel who will be associated with conducting the research are subject to a background check through the DCJD. All names and relevant information for each individual will be submitted to the Deputy Director for Administrative and Executive Services.
3. All personnel who will be associated with conducting the research are subject to volunteer training with the DCJD training department.

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VI.
Resubmission Procedure

A. Dallas County Juvenile Board decision is final.

Once a research project has been placed on the DCJD meeting agenda and it has been considered, a rejection of the project by the DCJB is a **FINAL** decision without recourse.

B. Need to Modify

1. The DCJD recognizes that the initial submission of a project may not meet the standards set forth in this policy or may not align with the DCJD mission or vision.
2. A resubmission procedure (also known as revise and resubmit) allows the requestor/PI/co-PI to revise and modify the initial submission in an effort that the proposal meets DCJD standards and aligns with the Department's mission and vision.
3. In order to facilitate this provision of this policy, the DCJD allows the requestor/PI/co-PI the opportunity to revise the research proposal and resubmit following an adverse decision during the initial review by research staff or by the RRC (i.e., the initial submission).

C. Feedback

1. During the initial phases of the submission review process, written feedback of the proposal can and will be provided to the requestor/PI/co-PI. Feedback can be provided by any senior staff member; however, it will be typically provided by the Manager of Research and Statistics and/or the Deputy Director of Administrative and Executive Services.
2. After all research proposal materials have been submitted for review, but prior to a final decision rendered by the Juvenile Board, the proposal will go through a multi-tiered vetting process including a pre-review by the Manager of Research and Statistics.
3. The most formal vetting process will be administered by the RRC, prior to docketing on the Juvenile Board agenda whereby feedback can still be provided to the requestor/PI.
4. Feedback is regarded as an objective measure or means of improving the research proposal through the prism of the Department's mission and vision. However, making and modifications to the research proposal does not guarantee a favorable outcome.

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VII.
Post Decision

A. Disclosure of Findings

1. At approximately the halfway point of the project, preliminary results from the approved research proposal must be presented in writing to the DCJD Manager of Research and Statistics. The requestor/PI/co-PI must disclose any departures from the approved proposal and surprising or unusual results (based on the stated research hypotheses). All preliminary results will be disclosed to the RRC.
2. At the time all of the data have been collected, all key findings shall be reported to the Deputy Directory of Executive and Administrative Services and Manager of Research and Statistics. Any and all manuscripts using the data shall be submitted to the DCJD for approval.

B. Manuscript Production

1. The production of manuscripts for publication using the data that come from external research under this policy are encouraged.
2. Any and all research projects that will use the data are subject to review by the Research and Statistics unit.