| TITLE | POLICY NUMBER | |
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| Research Review Requests | DCS 14-02 | |
| RESPONSIBLE AREA | EFFECTIVE DATE | REVISION |
| Office of Correspondence Control | September 24, 2018 | 2 |

## I. POLICY STATEMENT

The Department of Child Safety (Department or DCS) promotes and supports evidence-based, data-driven approaches to enhance child welfare practices. When the Department is approached by individuals or institutions engaged in bona fide research seeking access to DCS data, statistics, or human subjects, such requests will be reviewed by an internal Research Review Committee. The committee shall consider the best interests of the Department, as well as the children, youth and families it serves, when determining whether to grant such requests.

## II. APPLICABILITY

This policy applies to all research requests received from legitimate academic, social welfare, or governmental institutions with clearly articulated research questions and methodology regarding data collection, data analysis, and report writing.

This policy does not apply to audits, reviews, or studies conducted by federal, state, or local government agencies in the exercise of their management or administrative responsibilities.

Research involving the collection or study or existing data, statistical information, documents, or records is exempted from this policy if such information is publicly available.

## III. AUTHORITY

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| A.R.S. § 8-807(F)(2) | DCS information; public record; use; confidentiality; violation; classification; definition |
| 45 CFR 46 | Protection of Human Subjects |

## IV. DEFINITIONS

DCS Executive Leadership: The Director of the Department of Child Safety, the Deputy Director of Field Operations, and the Chief Quality Improvement Officer.

Department or DCS: The Arizona Department of Child Safety.

Human Subject: A living individual about whom a researcher obtains data, either from intervention or interaction with the individual, or through records that contain identifiable private information.

Informed Consent: The knowing consent of an individual or his or her legally authorized representative that is given without undue inducement or any element of force, fraud, deceit, duress, or other form of constraint or coercion to participate in an activity. For consent to be "informed," the individual or his or her legally authorized representative must possess accurate and complete information about the procedures to be performed, told the potential risks and benefits of participating in the research, understand the information provided, and give consent voluntarily.

Institutional Review Board or IRB: An administrative body established to protect the rights and welfare of human research subjects recruited to participate in research activities conducted under the auspices of the institution with which it is affiliated.

Research: The systematic investigation and acquisition of information for the purpose of developing or contributing to general knowledge, social programs, or scientific advancement and includes the collection of data for possible publication.

Research Review Committee (or "the Committee"): An assemblage of DCS employees constituted and convened in accordance with guidelines of this policy for the purpose of reviewing research proposals involving the Department.

Researcher: The principal investigator or project director who has responsibility for conducting the research.

Risk: Any potential for harm to the Department anticipated in the proposed research.

## V. POLICY

A. Types of Research Requests

The Research Review Committee may consider the following requests:

1. DCS Data and Statistics – for the purpose of any formal research or grant proposal that requests data and/or statistics that are not contained in Department reports, public records, or on the DCS website.

2. Human Subjects – any research, proposal, project, or grant pertaining to human subjects connected to DCS, including clients, employees, and/or any individuals involved with a DCS supported or funded program. All research regarding human subjects must be reviewed and approved by the Institutional Review Board (IRB) of the institution with which the requestor is affiliated, or granted an exemption by the IRB. Human subject research requests require a higher level of scrutiny by the Committee, as outlined in section V.F. of this policy.

B. Components or Research Request Proposals

1. All research requests shall include the following:

a. the goals of the research project;

b. the research methodology;

c. an explanation why access to DCS data, statistics, or human subjects is essential to the research;

d. a description of records and documents to be kept by the researcher, the location where records will be stored, how confidentiality will be assured and how documents containing any personally identifying information will be destroyed;

e. names of researchers and their experience in the topic to be researched;

f. the date when the research will commence and the date when it will conclude. No requests for extensions shall be approved unless they are submitted at least sixty days prior to the originally

submitted conclusion date.

2. Research Review Requests are public records and are deemed by the Department to be subject to disclosure unless otherwise protected by law.

C. Composition of Research Review Committee

The Committee shall consist of managers from a variety of areas including Business Operations, Correspondence Control, Business Intelligence, Field Operations, Field Resources and Policy Unit, Privacy, Quality Improvement, and any other individuals assigned by DCS Executive Leadership.

Additionally, representatives from any areas that may be affected by the research may be invited by the Committee to provide input. A chairperson shall be designated to coordinate the communication involving the researcher, the Committee, and DCS Executive Leadership.

D. Responsibilities of the Research Review Committee

1. The Committee shall meet on a regular basis to review and make a recommendation regarding whether to approve or deny a request from external researchers to gain access to DCS data, statistics, or human subjects. The Committee shall apply the criteria enumerated in section V.E.

2. The Committee shall determine whether informed consent is required for each request that is submitted; no research involving human beings as a subject shall be conducted unless the researcher has obtained the legally effective informed consent of the subject or the subject's legally authorized representative.

3. The chairperson shall prepare and archive a summary of all Committee meetings. Summaries shall include:

    a. names of attendees;

    b. actions taken by the Committee;

    c. a synopsis of the issues and concerns discussed by the Committee, including their reasons for recommending that the request be granted, denied, or modified by the researcher;

    d. whether the Department will benefit from the potential knowledge

or findings gleaned from the research, and how it may help the Department develop strategies to accomplish its mission.

E. Approved Criteria

The Committee shall apply the following criteria when considering whether to recommend approval or denial of a request.

1. The benefit to the Department of potential knowledge or findings gleaned from the research, and how it may help the Department develop strategies to achieve its mission;

2. The impact on the safety and well-being of the children, youth and families served by the Department;

3. The availability of the Department's resources and its ability to accommodate the request;

4. Any potential risks to the Department;

5. The necessity of the information/access being requested to accomplish the goals of the research;

6. The potential impact of the research on the problem or issue the research intends to explore;

7. The research plan's provisions for protecting the privacy and general welfare of subjects and/or maintaining the confidentiality of data;

8. The purpose of the research and the methods it will use.

F. Additional Requirements for Human Subjects Research

1. In addition to the requirements outlined in section V.B.1, the researcher shall provide the following:

   a. a description of the type of human subjects proposed to be involved in the research including their characteristics, the total number anticipated, how they will be selected, and the rationale for the use of this population;

   b. a description and assessment of potential benefits, if any, to the individual human subjects, the group or class of which the subjects are members, society in general, and to science as a result of the

activity;

c. a description and assessment of potential risk and potential for negative subject reactivity, if any, to the individual human subjects, the group or class of which the subjects are members, and to society in general as a result of the activity, whether such risks are physical, psychological, developmental, social, legal, or economic.

i. Human subjects shall be considered at risk in research if they are involved without having given their informed consent (see letter *e* below);

ii. Human subjects shall not be considered at risk if they are involved in a research activity that makes use of:

(a) observations of behavior open to public view;

(b) materials available to the public;

(c) aggregated statistical data.

d. a description of the means to be taken to minimize such risks, including the means by which the subject's personal privacy is to be protected and the confidentiality of the information obtained from or about the subject is to be maintained;

e. a description of the procedures to be used in obtaining and documenting the prior informed consent of the subject. Copies of the material to be used in obtaining informed consent shall be attached to the request;

f. a description of any special or unusual circumstances regarding the research activity that the researcher believes could be relevant or material to the Research Review Committee's decision.

## VI. PROCEDURES

A. Receipt of Research Requests

1. Inquiries about potential research projects are directed to the chairperson, who responds to the requestor with a letter or email explaining the

process, requirements, and time frames. A record of all inquiries is maintained in a tracking log by the chairperson.

2. A completed *Research Review Committee Request Form* (DCS-1561) is submitted to the chairperson, who acknowledges receipt of the request via letter or email. The chairperson reviews the proposal to ensure sufficiency of documentation. Urgent requests shall be handled on a case-by-case basis taking into consideration the nature of the request and the DCS resources available to accommodate the expedited request.

B. Review of Research Requests

1. The chairperson forwards the request to the Research Review Committee with instructions to respond prior to the next scheduled Committee meeting with questions, comments, and concerns. If the Committee members have questions about the proposal, the chairperson forwards those questions to the researcher.

2. Meetings shall be held on a regular basis. If the Committee requires more information from the researcher or additional time to review, the chairperson will facilitate a full exchange of information and/or advise the requestor that additional time is required.

3. The request will be presented to the members of the Research Review Committee, who will reply with their approval, denial, or abstention. The Committee will provide a recommendation to DCS Leadership to either a) approve the request; b) approve the request with conditions or restrictions; or c) deny the request.

4. The Committee shall reach a consensus regarding the request. If one or more members expresses an objection, their concern will be directed to the requestor, or to the affected unit within DCS, for further information and clarification. If the concern expressed by the Committee member(s) is not allayed, the Committee will be unable to reach a consensus and the research request shall be denied.

C. Legal Review

If the request is approved by the Committee, the Committee's meeting summary and all supporting documentation is sent by the chairperson to the Office of the Attorney General for a legal review. If the request contains a date by which approval is needed, that information will be included. The chairperson will

respond promptly to any questions, comments, or requests for more information from the Office of the Attorney General.

D. Final Approval of the Research Request

After the legal review, the research request proposal and the Committee's recommendation for approval will be sent to DCS Executive Leadership for final approval. Any member of DCS Executive Leadership may approve the request. The chairperson shall prepare a letter for signature by the approving member of DCS Executive Leadership to notify the researcher that the request has been approved. The letter shall contain an approval date and an expiration date; research cannot be conducted beyond the expiration date without re-approval by the Committee. The letter will include the following conditions:

1. The research is limited to the design presented in the request. The Committee must approve of any substantive changes to the research design before any changes are implemented;

2. The Committee must review all information derived from the research including summaries, scholarly papers, or other material before the information is released to the public;

3. The research findings must be presented to DCS Executive Leadership upon request;

4. A copy of the final research paper must be presented to the Committee and DCS Executive Leadership upon completion.

Upon approval of any research involving DCS statistical data or data files, the chairperson refers any required Data Sharing Agreement/Amendment forms to the DCS Privacy Officer pursuant to the Data Sharing Agreement (DCS 07-19) policy.

E. Denial of Research Requests

If DCS Executive Leadership denies the request, a denial letter will be sent to the researcher.

## VII. FORMS INDEX

*Research Review Committee Request Form (DCS-1561)*

*Data Sharing Agreement (DCS-3226)*

*Data Sharing Agreement Amendment (DCS-1182A)*