

DCF Policy #91-005

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POLICY FOR APPROVAL OF RESEARCH PROPOSALS AND SURVEY PARTICIPATION REQUESTS

POLICY

The Department conducts a quality assurance review of all requests for participation of Department staff or clients, including children who are in Department care or custody, in a survey or research study. Reviews are conducted on requests from external, independent researchers (including Department staff completing research to fulfill requirements of educational programs in which they are enrolled), and requests originated and/or contracted for by the Department. Requests for access to Department data are also subject to review.

The quality assurance review is completed by the Department Research Proposal Review Committee. The review considers how the rights of Department staff and clients, especially client confidentiality rights, will be maintained; the anticipated benefits of the research; the researcher's qualifications; and the impact of the research process on case practice and service delivery.

Requests from outside individuals or organizations for pre-existing aggregate data are directed to the Research Proposal Review Committee Chair, who arranges for the data to be provided. Requests for aggregate data that is not routinely available are subject to review and prioritization by the Research Proposal Review Committee. When the request requires Area and/or Regional Office staff assistance and/or participation, prior approval by the Area Director and/or Regional Director must be included in the submission, and the Research Proposal Review Committee may request review and approval by the Deputy Commissioner of Field Operations under certain circumstances.

Consent for Participation of Children in Department Care or Custody in Research Studies

Parents of children in Department care or custody retain the right to consent to participation by their child in any medical or psychological research. (See [Regulation 110 CMR 11.23](#)) If the parent(s) has legal custody, only parental consent is necessary for the child to participate in a research study. If the Department has legal custody and the parent(s) consents, then the Department consents provided there are no casework reasons for denying consent.

The Department may also withhold consent in situations in which the parents cannot be located, a petition to terminate parental rights has been granted, or a child has been surrendered for adoption. In these cases, judicial approval for the child's participation must be obtained.

The mature child, age 14 years or older, has the right to consent to her/his own participation in any medical or psychological research.

Research Proposal Requirements

The expected end-product(s) of the proposed research will benefit the Department in one or more of the following ways:

- it will provide significant information that is not otherwise available and will be of use in improving current case practice, consumer services or developing new services;
- it will result in provision of useful training for the Department by the research team or their associates, that is otherwise unavailable for Department staff, foster parents, and/or providers;
- it can be used to improve management of service delivery by increasing knowledge on consumer needs, service costs, effectiveness, and/or benefits; and/or
- it will aid the development of new mechanisms for service, personnel, systems, or fiscal administration.

The person or persons conducting the research will be professionally qualified to carry it out. Evidence of such qualifications must include one or more of the following:

- a degree that requires demonstration of research competency from an accredited university, e.g., Ph.D. or Ed.D.;
- publication(s) of prior research; and/or
- a faculty or research unit or educational department appointment or student status requiring research activity at an accredited college, university, or hospital, or an appointment requiring research competency at a social service organization.

External research projects will be time-limited from initiation to completion of end-products, preferably lasting no more than 6-9 months, unless the benefits to the Department are such that a longer period is warranted, as well as being appropriate to the project.

Research Proposal Review Committee

Each research proposal/survey participation request must be reviewed and approved by the Department's Research Proposal Review Committee which consists of 3 to 5 standing members appointed by the Commissioner to provide clinical, legal, operational, research and information system expertises. The Commissioner designates one member as chair.

When the research concerns HIV or AIDS, prior review by the Department Central Office AIDS Review Board is required. For the review of a specific request, additional members, including a Department consumer(s), may be designated by the Research Proposal Review Committee Chair to represent specific programs relevant to, or possibly affected by, the request.

While the Department supports the concept of social research and recognizes the value of the agency's database to researchers, it must set priorities for use of its limited staff resources. Agency policy is, therefore, that the investment of Department staff time and other resources will be commensurate with the results to be derived from the research. Researchers, who are not Department employees, do not have access to consumers' records. [See *Regulations*, 110 CMR 16.02 (04)] The rights of Department employees conducting research to access information required by the research are subject to review and approval by the Research Proposal Review Committee. *NOTE: Department employees do not have the right to use for research purposes the access they have to information related to their routine job duties.* This applies to records stored in written or electronic form. As a result, research requiring confidential information must involve Department staff in order to protect the confidentiality of such records. The Department limits projects by external independent researchers which require the use of confidential materials to those expected to be of equal or greater benefit to the agency than the agency resources they require. Unless written consent is obtained from the client (i.e., for a child in Department care or custody under age 14 years, the parent), the Department releases collected information to the researcher only in forms that do not allow identification of Department consumers, i.e., as aggregated data or as case data that have been treated in order to remove any information that could be used to identify the client(s), others mentioned in the record, or Department staff.

Data sources (including redacted case records) that are required for research projects may be available as copies of material already collected or prepared, and will have charges to the researcher to cover costs of provision (e.g., copying costs). Costs are set according to the Secretary of State's guidelines for access to public records. When responding to the data request requires extensive programming or comparable use of Department staff time or resources, the Department will estimate the costs to the researcher in advance.

PROCEDURES

1. **Researcher Contact.** The researcher should be directed to contact the Research Proposal Review Committee Chair/designee in Central Office. The Research Proposal Review Committee Chair/designee provides information to assist the researcher in developing an acceptable proposal, including providing a copy of this policy and the Department Sample Informed Consent form. This form outlines the information the researcher must provide to project participants (i.e., children who are in Department care or custody, their parents and/or Department staff) prior to obtaining their consent. The form also indicates that when the participant is a child who is Department care or custody, the

child's Social Worker, Supervisor and the Area Director/designee must consent to the child's participation, in addition to the child's parent or the child who is age 14 years or older.

2. **Review for Conformity with Required Components.** The researcher submits to the Research Proposal Review Committee Chair/designee in the Department's Central Office sufficient copies of the research proposal to provide one to each standing member of the Committee and each additional member appointed for the review and approval of the specific proposal. The Research Proposal Review Committee Chair/designee reviews all external research proposals submitted to ensure that all applicable components listed in Procedure 3 below have been received. If the Research Proposal Review Committee Chair/designee determines that the volume of proposals meeting the agency's criteria is greater than the agency can absorb, she/he works with the Research Proposal Review Committee to set priorities on projects.
3. **Required Research Proposal Components.** The submitter of a research project must provide the following to the Research Proposal Review Committee Chair/designee:
 - A research proposal including:
 - objective(s) of the research
 - description of the research methodology, including a copy of any survey/questionnaire instrument
 - type(s) of data needed
 - expected data source(s)
 - expected end-products of the research
 - estimate of completion times for entire project and principal stages;
 - **letters of approval from the Department Area Director and/or Regional Director, when the research is anticipated to have an impact on staff or clients in a participating Area and/or Regional Office;**
 - letters of support from other involved Department offices or units, agencies, residential facilities, institutions or organizations (as available);
 - resume(s) of principal researcher(s);
 - description of any relevant institutional or organizational involvement;
 - copies of university and/or hospital "human subjects review committee" or "internal review board" approval of the project, if relevant;
 - copy of the informed consent form(s) to be utilized by the project that is based on the Department Sample Informed Consent form, includes information specific to the project and meets Department requirements;
 - source(s) of funding for the project (as applicable);
 - description of benefits to accrue to Department consumers, staff, or the management of service delivery;
 - evidence that Department consent and confidentiality requirements will be maintained;
 - an estimate of Department staff time and/or other Department resources needed for the project.

The Research Proposal Review Committee Chair/designee consults with the General Counsel, whenever concerns arise about whether a particular research request meets the criteria above or should be required to meet additional criteria.

4. **Committee Review of the Proposal.** The Research Proposal Review Committee Chair/designee ensures that the proposal is distributed for review by members of the Research Proposal Review Committee. For those research requests that require the assistance and/or participation of Area and/or Regional Office staff, the Research Proposal Review Committee Chair/designee ensures that letters of approval from the Area and/or Regional Director are included in the submission. The Research Proposal Review Committee Chair/designee determines whether the Committee's decision regarding approval or denial of the proposal will be based on discussion at a Committee meeting(s), through receipt of written comments from Committee members, or a combination thereof.

5. **Final Approval.** Is by the Research Proposal Review Committee, except that the Committee may request review and approval by Deputy Commissioner of Field Operations under certain circumstances, when a request involves Area and/or Regional Office staff participation and/or assistance.
6. **Outcome Notification/Further Requirements of Researcher.** The Research Proposal Review Committee Chair/designee notifies the researcher(s) of the final decision as soon as possible, in writing. The notification specifies that the researcher must further agree to:
 - mail a copy of the final draft research product (report, article, presentation, etc.) for review to the Research Proposal Review Committee Chair/designee;
 - acknowledge Department support in any article published as a result of the approved research proposal; and
 - provide to the Research Proposal Review Committee Chair/designee a copy of any reports/publications produced as a result of the approved research proposal for inclusion in the Department library at Central Office.

Further arrangements regarding collection and/or provision of data, including payment of any required fees that may be assessed, will be made between the researcher(s), the Research Proposal Review Committee Chair/designee, and any other Department staff who will be affected by the project. Department staff and clients whose participation and/or assistance is being requested have the right to see a copy of the Department's written notification of project approval before they participate or provide assistance.

7. **Resubmission of Non-Approved Proposal.** If a research request is rejected, the Research Proposal Review Committee Chair/designee notifies the researcher(s) as to whether the request may be modified and resubmitted. If so, it will then be reconsidered as a new request. The Research Proposal Review Committee may choose not to reconsider a project.
8. **Notification Re: Delays.** If the Research Proposal Review Committee Chair/designee finds it necessary to set priorities for either consideration or start-up of approved projects, she/he (or designee) notifies the researcher(s) of any resultant delays as soon as possible, and requests her/him to notify the Research Proposal Review Committee Chair/designee if she/he wishes to modify or withdraw her/his request as a result.