



POLICY STATEMENT
Commonwealth of Pennsylvania • Department of Corrections

Policy Subject: Research Activities		Policy Number: 2.1.2
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I. AUTHORITY

The Authority of the Secretary of Corrections to direct the operation of the Department of Corrections is established by Sections 201, 206, 506, and 901-B of the Administrative Code of 1929, 71 P.S. §§61, 66, 186, and 310-1, Act of April 9, 1929, P.L. 177, No. 175, as amended.

II. PURPOSE

It is the purpose of this directive to set forth the policies and procedures governing all research activities involving staff and/or inmates in facilities and/or programs under the jurisdiction of the Department.¹ The directive affirms the Department's belief that controlled experiments, evaluations, and policy research can contribute to new correctional knowledge and, thereby, to more efficient and effective facility operations, conservation of resources, and increased public safety.²

III. APPLICABILITY

This policy is applicable to all research activities involving staff and/or inmates in facilities and/or programs under the jurisdiction of the Department.

IV. DEFINITIONS

A. Academic Paper/Project

A research paper or project conducted by university faculty and/or students, which examines a topic of relevance to the department. The objectives generally are to produce new data, information, and/or understanding to or of the department, and to

¹ 4-4111

² 1-ABC-1F-05, 2-CO-1F-10

contribute to the educational goals and research agenda of the student/faculty member.

B. Contracted Research

Research performed by a researcher under contract to the Department.

C. Department

The Pennsylvania Department of Corrections.

D. External Research

Research requested or initiated by individuals or organizations external to the Department.³

E. Informational Request

A request for information made to any office of the Department by parties external to the Department. These parties include legislative offices, the media, the public, universities, other agencies, etc. The requested information can be any information about inmates, staff, operations, policies, or programs of the Department. An informational request is an informal request for a specific piece of information.

F. Informational Survey

A data collection tool used to gather public information on the correctional population and/or Department staff.

G. Facility Research Coordinator (FRC)

An individual designated by the Facility Manager/designee to serve as the FRC for research proposals at the respective facilities. This individual shall serve as a liaison between the Research Review Committee and shall coordinate research activities at his/her facility. The individual assigned to this position should have some educational or practical knowledge of or experience with research methodology.

H. Facility Review Board (FRB)

A panel established by research organizations, such as universities, to provide human subjects review of research proposals. Human subjects review ensures that research proposals meet commonly accepted standards of research ethics, and identifies possible areas where research proposals could cause harm to persons. Most research organizations require FRB approval for most research proposals.

³ 2-CO-1F-11

I. Internal Research

Internal Research is research activities conducted by staff of the Department. Such research may be conducted solely internal to the Department or may be conducted in conjunction with other government agencies or other research entities.

J. Medical Practice Review Committee (MPRC)

A Department committee consisting of the Secretary/designee, the Executive Deputy Secretary/designee, a Regional Deputy Secretary/designee, the Director of Inmate Services/designee, the Central Office Medical Director/designee, the Chief Counsel/designee, the Chief of Research and Evaluation/designee and other designated Department staff. The committee shall review requests to use an experimental research design to evaluate the effectiveness of medical practices/procedures with the inmate population.

K. Medical Research

Research which seeks to use inmates in medical experiments, cosmetic experiments, or pharmaceutical testing.

L. Bureau of Planning, Research, Statistics, and Grants (PRSG)

The bureau responsible for managing and coordinating research and statistical reporting for the Department. PRSG maintains a variety of key databases on facility operations and inmate populations. PRSG provides Department decision makers with research and analysis used in formulating Department policy and evaluating programs.

M. Researcher

The primary person/agency responsible for submitting the research proposal and overseeing completion of the project.

N. Research Activities

A project, paper, or study designed primarily to produce new data, information and/or understanding of corrections, criminal justice, management or other issues of relevance to the Department. Secondary data sources (existing Department datasets) may supplement such research. Department employees, university students, faculty, and other external researchers may undertake research. Research is distinct from Informational Requests of Informational Surveys.

O. Research Review Committee (RRC)

A Central Office committee chaired by the Research and Evaluation Manager or other designee of the Chief of Research and Evaluation, which is responsible for reviewing all unsolicited research proposals submitted to the Department. The standing

membership of the RRC shall include senior Department officials as appointed by the Secretary/designee or RRC Chair. The committee chair may appoint other persons to serve on the RRC, on an ad hoc basis, for reviewing specific proposals.

V. POLICY

The Department shall support and engage in research activities, which directly affect and direct ongoing planning activities.⁴ It is the policy of the Department to identify its needs for evaluation and conduct research concerning inmate programs and other Department activities, such as drug testing, employee training initiatives, etc. Evaluation findings will be used to inform the development and/or modification of programs.

VI. PROCEDURES

The Department shall encourage close cooperation between Department staff and research personnel assisting in research design, establishing research priorities, assisting in experimental design, data collection, assessment, and evaluation.⁵ Research and evaluation activities using generally accepted methods and research standards, can contribute to new correctional knowledge and, thereby, to more efficient and effective facility operations, conservation of resources, and increased public safety. The Department shall encourage research conducted by qualified personnel.⁶ As available, the Department shall seek funding support from public and private sources to assist the Department to undertake approved research activities. Academic preparation and previous research background shall serve as indicators of researcher qualifications.

A. General Requirements

1. Unsolicited research projects shall be implemented only after the Research Review Committee (RRC) has reviewed and approved the proposal.⁷
2. The privacy of an inmate and staff member shall be respected. The researchers shall ensure that individual confidentiality is not compromised. An inmate and/or staff member shall not be individually identified in any research project. Aggregate identifiers, however, such as age, race, sex, offense category, etc., may be used.⁸
3. The Department may permit access to Department data for the purpose of research, evaluation, and statistical analysis in accordance with a written agreement that authorizes such access, outlines the permitted uses of the data, and ensures that confidentiality and security shall not be compromised consistent with existing Department policy **DC-ADM 003, "Release of Information"**.⁹

⁴ 4-4108, 4-4109

⁵ 4-4108, 4-4110

⁶ 4-4109

⁷ 2-CO-1F-12

⁸ 2-CO-1F-15

⁹ 2-CO-1F-09

4. The use or employment of an inmate as a subject in any medical experiments, cosmetic experiments, or pharmaceutical testing is prohibited except under the provisions cited under **Section VI.E.** of this policy.¹⁰
5. Participation in research activities by a Department staff member and/or an inmate shall be granted on a voluntary basis.¹¹ Where a research proposal holds a reasonable potential for having some adverse psychological, emotional or other impact upon an inmate or staff, as determined by the subject matter of the study, the researcher must obtain approval for the study from the RRC and/or from the Medical Practice Review Committee (MPRC) where appropriate.
6. The researcher must secure signed consent waivers from an inmate and/or staff before beginning the research, unless granted an exemption from this by the Institutional Review Board (IRB). Researchers are advised to secure consent waivers even where RRC review indicates no serious potential for harm from the research proposal. The consent form shall indicate the inmate's or staff member's voluntary participation in the research study and his/her agreement to permit the researcher to review confidential records/data as specifically cited on the consent form. Researchers are not to provide compensation or other rewards to an inmate for his/her participation in research, unless special permission is granted by the RRC. In general, any information that inmates or staff disclose to the researcher will not be disclosed to the Department, except where the researcher believes the individual is a threat to his or her own health or safety, the health or safety of another person, or to the security or orderly operation of any State Correctional Institution or Community Corrections Center, especially where an inmate has expressed an intention to harm self or others. This exception must be clearly stated on the consent form.
7. Department staff who are conducting research for their own personal academic gain shall submit a written agreement to PRSG indicating that such research shall not be conducted during regular working hours. In accordance with the Governor's Code of Conduct, staff are not permitted to conduct research for their own personal pecuniary gain. Staff must obtain authorization and signatures from their immediate supervisor and bureau director or the facility superintendent as part of their Research Approval Request Form.
8. Research proposals (including academic papers), informational surveys and requests that seek to draw data only from existing Department datasets, rather than to collect original data from staff or inmates, shall generally not be considered to be research as defined by this policy, but may be subject to review by the RRC and/or the PRSG in order to resolve issues regarding the confidentiality and use of datasets, especially where the data focuses upon inmates or staff.

¹⁰ 2-CO-1F-14, 4-4402

¹¹ 1-ABC-1F-09, 4-4113

B. Procedure for Obtaining Approval to Conduct Research

1. Every research proposal that is not initiated by the Secretary/designee, the Executive Deputy Secretary/designee, a Regional Deputy Secretary/designee, or PRSG shall be subject to review by the RRC. Such proposals shall be submitted to PRSG in the appropriate format on the **DC-028, Research Approval Request Form (RARF) (Attachment A)**.¹² Failure to complete *all* required sections of the RARF will result in the proposal being temporarily rejected. This rejection will be communicated in writing to the researcher. The researcher, after appropriately completing all sections of the RARF, may resubmit the proposal for review.
2. All research proposals submitted by students (undergraduate or graduate level) must have a research advisor's signature indicating that he/she has reviewed the student's proposal and agrees that the quality of the submission meets both DOC standards and their own college/university standards for quality and soundness of design.
3. ***To ensure the rights and welfare of human research participants is protected and the privacy and confidentiality of participant responses is maintained, all proposals submitted by inmates or residents requesting permission to conduct survey research in any state operated institution or Community Corrections Center will be rejected.***
4. If a research request is initially submitted to a facility or a Central Office Bureau other than PRSG, the Facility Manager/designee or Bureau Director shall forward the request to PRSG with a cover letter that recommends approval, approval with conditions, disapproval, or a request for an opinion about the disposition of the research proposal. The facility recommendation and the research proposal shall be distributed to the RRC for final disposition.¹³
5. In order to facilitate coordination of research review and the oversight of research activities at the facility level, each Facility Manager/designee shall appoint a Facility Research Coordinator (FRC). The FRC shall coordinate development of facility responses to research proposals, assist approved researchers in gaining access to necessary staff and/or data, and keep PRSG abreast of the progress on active research projects. Additionally, the FRC shall serve as a contact point for Central Office inquiries about specific research activities.¹⁴
6. A research proposal submitted to PRSG shall be distributed to the RRC for full or expedited review, after initial evaluation by the Research and Evaluation Manager, or other individual as designated by the Research and Evaluation Manager or the Chief of Research and Evaluation. Proposals may be rejected at this stage of initial review due to poor quality or other reasons. Input shall also be solicited from Facility Managers/designees, Bureau Directors/designees or other offices directly

¹² 1-ABC-1F-06

¹³ 4-4112

¹⁴ 1-ABC-1F-08

affected by the proposed research. Full review shall be employed for most proposals. Full review implies a detailed reading of the proposal by the RRC. Expedited review shall be used primarily for proposals that are extensions of existing projects, for proposals that have previously secured the support of top Department officials or in other cases where full review is not critical.

7. The RRC shall be convened, either formally through scheduled meetings or informally through distribution of submitted requests, on an as needed basis to review submitted research proposals. The Committee shall be authorized to approve or disapprove all research proposals which do not address Department policies and/or which shall not significantly enhance the literature regarding correctional facilities and management thereof.
8. The RRC's approval or disapproval of any research proposal shall be based on the following criteria:¹⁵
 - a. the confidentiality of Department staff or inmate participants shall be assured;
 - b. the research would not adversely impact the security and safety of the Department, its facilities, and staff;
 - c. the Department resources and the efforts required to perform the research would not exceed the potential benefits of the research to the Department and its daily operations;
 - d. the proposal would not require the use of an inmate as a subject in a medical or cosmetic experiment or pharmaceutical testing that is not generally accepted by state and federal health care professionals;
 - e. a staff and inmate participants shall be sought on a voluntary basis; and
 - f. the research proposal offers a clear and complete discussion of objectives, significance, previous research, methods, analysis, and expected outcomes. Research methods should adhere to generally accepted standards of research practice. The researcher should explain deviations from generally accepted practice. The RRC reserves the right to reject proposals that are poorly constructed, inadequately articulated, or which cast doubt upon the qualifications of the researcher. If a proposal is rejected by the RRC, the researcher may be given an opportunity to address the issues and concerns of the committee and resubmit an improved proposal. The number of times a researcher can resubmit a proposal is limited and cannot exceed three (3) attempts.
9. Upon evaluating the research proposal on its compliance with the criteria cited in **Section VI. 6.** of this policy, as well as based on the comments submitted from the affected program area and/or facility, the RRC shall issue a preliminary

¹⁵ 1-ABC-1F-07

recommendation on the research proposal. This recommendation shall be forwarded to the RRC Chair for final review and approval. The Department's decision regarding each research proposal shall be forwarded to the researcher within 30 working days of receiving the proposal or as soon as practicable.

C. Research Conditions

The RRC may impose conditions on the proposed research design/methodology if it deems that such restrictions are necessary considering Department resources, security concerns, or confidentiality issues. In the event that such conditions are required, the researcher shall receive written conditions regarding the research design/methodology upon receiving research approval notification.¹⁶

D. Research Distribution

1. Report Submission

Upon completion of the research project, the researcher shall submit a final research report to PRSG. The RRC Chair, shall distribute copies of the report to all interested parties.

2. Distribution of External Research

The Department may choose to duplicate and distribute the completed research project to Department personnel. If the researcher does not wish to have the final project distributed within the Department, a cover letter indicating the researcher's reservations should be attached to the copy of the findings, which is submitted to the Director/designee of PRSG.

3. Internal Research Distribution

Research conducted solely with Department resources shall remain the property of the Department. The dissemination and use of such research shall be at the discretion of the Secretary/designee.

E. Procedure for Obtaining Approval for the Administration of Generally Accepted Medical Practices

1. The use or employment of an inmate as a subject in any medical, pharmaceutical, or cosmetic experiments or testing is prohibited. However, this policy shall not result in an automatic ban on the use of pharmaceuticals and other medical protocols that, although technically classified as experimental or under testing are generally accepted by the medical community for the treatment of diseases such as AIDS and HIV infection.¹⁷

¹⁶ 4-4111

¹⁷ 2-CO-1F-13

2. Additionally, requests from legitimate research/treatment/medical personnel designed to evaluate the effectiveness of generally accepted medical practices/procedures with the inmate population shall be evaluated on a case-by-case basis by the MPRC. Such requests shall be submitted in the format specified in **Section VI.A.** of this policy. The MPRC shall carefully weigh the potential benefits of participation versus the associated risks. Approval or disapproval of any medical procedure/project shall be issued by the MPRC within 30 working days of the Department's receipt of the proposal.¹⁸

F. Public Dissemination Of Research Findings

If there is intent to publish the findings on the completed research, PRSG and the Facility Manager/designee in whose facility the research was conducted, should be advised, in writing, by the researcher at least 30 days prior to submission for publication, of the journals or other sources in which publication shall be sought. The Department shall not discourage the publication of any approved external research project but does retain the right to review and comment on the research prior to its publication.¹⁹ The RRC Chair shall coordinate any written response on the research and shall forward the response to the researcher.²⁰

G. Other Research Activities

1. Academic term papers and informational surveys, which require the dissemination of already existing information, shall not be considered research as defined under this policy. Facility specific data requests that are received by facilities may be completed and/or compiled at the discretion of the Facility Manager/designee. Such requests do not need to be forwarded to Central Office for review prior to completion.
2. If a Facility Manager/designee or Bureau Director/designee decides to participate in informational surveys that seek subjective responses and that shall be used for public dissemination, the respondent should clearly indicate on the survey "the response reflects the opinion of the respondent and not necessarily that of the Department".
3. In order to track survey activities, a courtesy copy of any surveys completed by facility or Central Office Bureaus shall be submitted to PRSG for the central survey file.
4. A request received by specific facilities for Department data may be forwarded to PRSG for completion or dissemination to the most appropriate Central Office Bureau for completion.

¹⁸ 4-4402

¹⁹ 4-4111

²⁰ 2-CO-1F-09

5. Generally, the Department declines to participate in marketing surveys. Under no circumstances are staff permitted to accept any form of payment or other incentive for responding to surveys or inquiries. Any payments or other incentives sent by individuals or organizations in advance as a means of encouraging a response to a survey or inquiry are to be returned immediately by the staff member to the sender. Staff are also to inform the sender that he/she must refrain from sending such payments or other incentives in the future. Criteria for responding to informational surveys and inquiries is as follows:
 - a. the survey should be done in a professional manner, making it easy for the Department to respond. The Department does not make a commitment to respond to surveys that are poorly constructed, confusing or burdensome;
 - b. the timeline of the survey must be reasonable. Completion of the survey or inquiry must fit with overall Department research priorities and needs;
 - c. if a survey asks for a complex compilation of data which does not presently exist, the Department reserves the right to decline to respond, depending upon current workloads and priorities; and
 - d. where the researcher is not responsive to questions or requests for clarification about the survey, the Department reserves the right to decline to complete the survey or inquiry.

H. Evaluation of Specific Programs

1. The Chief of Research and Evaluation, in conjunction with the Secretary/designee and administrative staff, defines the Department's needs for evaluation of specific inmate programs.
2. Considerations for determining evaluation needs include:
 - a. policy interests, what is happening with the program, is it expanding?
 - b. program scope, how many inmates does it affect?
 - c. is it worth evaluating?
 - d. what do we wish to learn from the evaluation?
3. The PRSG shall identify an external research partner to conduct the evaluation. The external research partner will typically be based at a university or other research institution and will possess the requisite expertise, qualifications and interest in partnering with the Department to conduct the evaluation.
4. The external research partner, in cooperation with the Chief of Research and Evaluation shall seek third party funding to support the evaluation.

5. The Chief of Research and Evaluation will develop an evaluation plan in cooperation with the research partner and he/she will serve as the Department's liaison throughout the project.
6. An evaluation advisory committee shall be established for each project.
 - a. The specific nature of each project will dictate the structure and size of the advisory committee.
 - b. The committee will consist of a range of stakeholders for the program/activity being evaluated. Facility staff who operate the program, as well as central office administrative staff shall be included as committee members. Others, such as representatives from other agencies and/or providers may be invited to participate.
 - c. The committee provides regular oversight of the evaluation and input into the design of the project.
7. The research partner will meet with the advisory committee and provide updates as the project proceeds. A final report will be prepared and submitted to the committee prior to it being made public.
8. The advisory committee will review the final report and prepare recommendations for changes or modifications to the program(s) as indicated by the evaluation results.
9. The Secretary/designee will approve/disapprove the recommendations for changes or modifications to the program(s). The advisory committee is responsible to provide regular updates on the progress in implementing them.

VII. SUSPENSION DURING EMERGENCY

In an emergency or extended disruption of normal facility operations, the Secretary/designee may suspend any provision or section of this policy for a specified period.

VIII. RIGHTS UNDER THE POLICY

This policy does not create rights in any person nor should it be interpreted or applied in such a manner as to abridge the rights of any individual. This policy should be interpreted to have sufficient flexibility to be consistent with law and to permit the accomplishment of the purpose of the policies of the Department.

IX. RELEASE OF INFORMATION AND DISSEMINATION OF POLICY

A. Release of Information

1. Policy

This policy document is public information and may be released upon request.

B. Distribution of Policy

1. General Distribution

The Department's policy and procedures manuals (when applicable) shall be distributed to the members of the Central Office Executive Staff, all Facility Managers, and Community Corrections Regional Directors on a routine basis.

2. Distribution to Staff

It is the responsibility of those individuals receiving policies and procedures, as indicated in the "General Distribution" section above, to ensure that each employee expected or required to perform the necessary procedures/duties is issued a copy or an electronic version of the policy and procedures.

X. SUPERSEDED POLICY AND CROSS REFERENCES

A. Superseded Policy

1. Department Policy

2.1.2, "Research Activities," issued April 20, 2004, by Secretary Jeffrey A. Beard, PhD.

2.1.2, "Research Activities," issued March 8, 1999, by former Secretary Martin F. Horn.

2. Facility Policy and Procedures

This document supersedes all facility policy and procedures on this subject.

B. Cross References

1. Administrative Manuals

DC-ADM 003, Release of Information

2. Accreditation Standards

a. Administration of Correctional Agencies: 2-CO-1F-09, 2-CO-1F-10, 2-CO-1F-11, 2-CO-1F-12, 2-CO-1F-13, 2-CO-1F-14, 2-CO-1F-15

b. Adult Correctional Institutions: 4-4108, 4-4109, 4-4110, 4-4111, 4-4112, 4-4113, 4-4402

c. Adult Community Residential Services: None

- d. Adult Correctional Boot Camp Programs: 1-ABC-1F-05, 1-ABC-1F-06, 1-ABC-1F-07, 1-ABC-1F-08, 1-ABC-1F-09
- e. Correctional Training Academies: None