

December 28, 2015

Brecht Donoghue
Office of Juvenile Justice and Delinquency Prevention, Department of Justice
Principal Investigator, Census of Juveniles in Residential Placement

Re: Approval of Expedited Institutional Review Board (IRB) Submission of Census of Juveniles in Residential Placement (CJRP)

Dear Ms. Donoghue:

On November 19, 2015, Principal Investigators, Monica Robbers and Brecht Donoghue, submitted a request to CSR's Institutional Review Board (IRB) to conduct an expedited review of the Census of Juveniles in Residential Placement. A three member panel from CSR's IRB conducted the expedited review. The panel members included;

- John Foster-Bey, DLS, MBA, MPA (President and Chief Executive Officer of CSR, Incorporated)
- Amanda Farrell, M.A., M.Sc., Ph.D., (Assistant Professor Criminal Justice, Marymount University)
- Patricia M. San Antonio, M.A., Ph.D. (Project Manager, CSR, Incorporated)

Based on the panel's review, CSR's IRB has approved the Census of Juveniles in Residential Placement (CJRP).

- In reviewing this application, it was found that the proposal is consistent with ethical and legal considerations related to human subjects' research.
- This is a census of juvenile residential placement facilities so there is no question of unfair sampling or selection of participants.
- The letter of informed consent provided with the application contains the purpose of the study, as well as how the data will be utilized, and informs subjects that their participation is voluntary.
- Researchers reduced burden on participants by streamlining and simplifying the census form, providing an online tool and toll free number for help. Respondents can use either the paper or online form.
- No financial or other incentives are offered to facilities for their cooperation so there are no concerns related to undue influence.



- Facilities are the unit of analysis so additional concerns related to juveniles and prisoners as special populations are mitigated.
- The same level of protection will be applied to all participants.
- There are no identifiable harms to the individuals in these facilities that have been presented.
- No potential harms to facilities been presented, save for concerns related to deaths in custody.
- The data on deaths in custody are reported only at the national level. Data are not disaggregated at the state or local level.
- Researchers clarified that disaggregated data of deaths of juveniles in custody would not be uploaded to or available through Inter-University Consortium for Political and Social Research (ICPSR). This mitigates the concern related to identification of individual youths and facilities through data that is released for research purposes.
- The letter of informed consent provided with the application contains the purpose of the study, as well as how the data will be utilized, and informs subjects that their participation is voluntary.
- The researchers provided a detailed description of data security,

The IRB Committee suggests that in the letter of consent, add the word secure to the sentence identifying the online reporting option, so that it now reads "...we also have a secure online reporting option. This speaks to data security and storage, which are also considerations in the responsible conduct of research of human subjects.



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