

# Research Policy

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[Description](#)

[Policy](#)

[Tracking](#)

[Requirements for Authorizing Research within CWS Using HHS Resources](#)

[Alignment with SET Values](#)

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## Description

Centralized Child Welfare Services (CCWS) reviews and evaluates all CWS research proposals, and tracks and monitors all active CWS research projects following HHS guidelines. Research proposals may come from outside of the county (universities, hospitals, students, other agencies) or from inside the county (a county department, staff, interns, or contractors).

Research is defined as a systematic investigation, including research development, testing, and evaluation, designed to develop or contribute to general knowledge. The Research proposal needs to be evaluated based upon its widest ramifications, including but not limited to: feasibility, appropriateness, value added, cost and staff time and resources are considered along with any potential operational, financial, and political risks to the county.

The Office of Strategy and Innovation (OSI) reviews and evaluates all research applications for risk. OSI maintains a list of current research projects for HHS. Completed research is maintained for seven years from the end date of the project.

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## Policy

Many individuals, including local and non-local researchers, external agencies, and graduate students may wish to conduct research within CWS or its contracting agencies if the purpose of the project is to develop or contribute to generalizable knowledge. However, only studies with adequate designs and controls merit the involvement of staff or clients.

Agency employees who initiates research with external parties will follow the policy and procedures set forth in this document. **Staff will obtain authorization from their Deputy Director** and enter into an MOA for use of HHS resources.

Memorandums of Agreement (MOA) for research projects are developed by CCWS to include terms and conditions covering the responsibilities of all parties: the ownership, acknowledgement, and handling of data; project timelines; Agency review of materials before publication. CWS does not use Data Use Agreements (DUA) due to the confidentiality of CWS data. DUAs allow an external entity to access personal identifiable data.

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## Tracking

The HHS Office of Strategy and Innovation (OSI) and HHS Agency Contract Support (ACS) track all ongoing research. ACS maintains administrative Policy for info for all HHS MOAs/MOUs and tracks all MOAs/MOUs via Cobblestone. The MOA template is updated and maintained by ACS. CWS tracks its MOAs/MOUs internally and posts current research projects on the County of San Diego Intranet.

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**Requirements for authorizing Research within CWS using HHS resources**

The following table outlines the process for obtaining a Research project authorization within CWS:

Step	Who	Action
1	Researcher/Requestor	<ul style="list-style-type: none"> <li>• Contacts the Office of Strategy and Innovation (OSI) reviews and evaluates all research applications for risk. OSI maintains a list of current research projects for HHS.</li> </ul>
2	Office of Strategy and Innovation (OSI) and or the Researcher/Requestor	<ul style="list-style-type: none"> <li>• Contacts the CWS Deputy Director (DD) or their designated Research Liaison for an application packet.</li> <li>• Completes Research proposal packet and returns to the Research Liaison.</li> </ul>
3	Research Liaison (Data Unit)	<ul style="list-style-type: none"> <li>• Once a completed application packet is received, conducts a preliminary evaluation of the proposal.</li> <li>• Research proposal will be evaluated for relevance, appropriateness, benefit and value to the agency, fiscal, political and operational risks.</li> <li>• Submits the Research proposal for approval from the Institutional Review Board (IRB).</li> <li>• Prepares executive approval/recommendation letter, addressed to Office of Strategy and Innovation (OSI).</li> </ul> <p><b>NOTE:</b> If a proposal affects multiple regions/ departments, requires recommended approval from each executive or their representative.</p>
4	Institutional Review Board (IRB)	<ul style="list-style-type: none"> <li>• All research is required to have a review and approval letter from an IRB to provide ethical and regulatory oversight of research that involves human subjects.</li> <li>• Typically, an IRB approval letter is renewed annually and researchers are required to provide the Research Liaison up to date approval letters throughout the life of the MOA.</li> <li>• Changes to the method or tools of the research project after the initial IRB approval require an updated IRB letter.</li> </ul>

**Requirements for authorizing Research within CWS using HHSA resources (cont.)**

Step	Who	Action
5	Research Liaison (Data Unit)	<ul style="list-style-type: none"> <li>• Collaborates with researcher to write draft MOA</li> <li>• All work that is to be done under the agreement must be described in the MOA for all parties. Any required attachments should also be noted in the MOA.</li> <li>• Consults initially with the following when drafting the MOA:               <ul style="list-style-type: none"> <li>○ County Counsel – Will advise if a Juvenile Court order is required for the release of identifiable CWS data or for access to CWS clients.</li> <li>○ Privacy and Compliance – Will review early draft of MOA, Research Proposal, and OSI Recommendation for Article 14 requirements.</li> <li>○ Risk Management – Will assess risk and provide required insurance language.</li> </ul> </li> <li>• Prepares any court ordered requirement as needed, for the release of data to be submitted to CC with the draft MOA.</li> <li>• The draft MOA and court order are submitted to the judge’s clerk with a request for review and signature.</li> <li>• The signed court order must be included as an attachment to the MOA.</li> <li>• Makes any needed changes with researcher approval and sends to CWS contracts unit</li> </ul>
6	Contracts Unit (Designated contact)	<ul style="list-style-type: none"> <li>• Moves the draft MOA through the HHSA internal review process, which requires review and approval by Agency Contract Services (ACS), Risk Management, Privacy Office and County Counsel (CC).</li> <li>• The draft MOA will be updated with any recommended changes from the internal reviewers, and will be sent back to the researcher for their comments and potential changes.</li> <li>• Once the MOA draft is finalized, a copy will be provided to the Research Liaison for submission to OSI.</li> </ul>

**Requirements for authorizing Research within CWS using HHSA resources (cont.)**

Step	Who	Action
7	Research Liaison (Data Unit)	<ul style="list-style-type: none"> <li>• Provides a complete “Research Proposal Synopsis” to OSI, which includes the final draft of the MOA, the research proposal and supporting documents, and CWS executive approval letter. OSI reviews the recommendations and provides written confirmation of completion of review to the CWS Research Liaison.</li> </ul> <p><b>NOTE:</b> OSI does not determine whether to move forward with the project, but advises on concerns/risks that must be addressed before proceeding.</p> <ul style="list-style-type: none"> <li>• Forwards OSI’s written confirmation to Contracts Unit for submission with MOA packet.</li> </ul>
8	Contracts unit (designated contact)	<ul style="list-style-type: none"> <li>• Once internal approvals are obtained, the final, approved MOA is provided to the external parties for signature, and returned to the CWS contracts unit. All MOAs with universities, colleges and hospitals must be approved by the Institution’s Dean, Dept. Chair or Director/CEO.</li> <li>• Prepares MOA routing packet for final execution, which includes memos to the CWS Director and the HHSA Director, the partially-executed MOA, the Director’s Routing slip, signed court order (if required), and any supporting documents.</li> <li>• Submits MOA routing packet to CC to stamp and sign the hard copy of the MOA prior to delivery to the Agency Executive Office.</li> <li>• Provides copies of the fully executed MOA and attachments to ACS, OSI, Research Liaison, and the researcher/requestor.</li> </ul>

**Alignment with SET Values**

This policy incorporates SET value #6 by contributing to a workplace characterized by ongoing learning, reflection, data driven decisions based on outcomes in the practice of social work.