County of San Bernardino
Department of Behavioral Health

Research Policy

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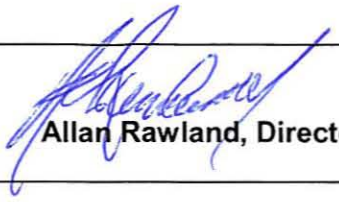

Allan Rawland, Director

Policy

All research conducted within the Department of Behavioral Health will be conducted with the welfare and rights of the subjects in mind, particularly if they are clients.

- Researchers must adhere strictly to the ethical guidelines as specified in the Ethical Principles in the Conduct of Research with Human Participants (American Psychological Association) and as specified by the HSS Office of Human Research Protections (OHRP).
- The Director of the Department, or designee, will approve all research proposals and grant applications prior to initiation within the Department.

Purpose

The purpose of this policy is to inform staff and perspective researchers who propose to use Department resources or client data of standards and expectations set by DBH in accordance with federal and state regulations.

Committee Review

The Research Review Committee (RRC) will review **all** of the following to insure that clients are protected from exploitation and for feasibility, risks and benefits:

- Research proposals
- Grant application requests
- Program evaluation projects

The Committee will give priority to projects that will clearly benefit DBH, or reasonably have the potential to benefit.

Exceptions: Projects that the Chief of Research and Evaluation deems exempt or in fulfillment of routine business process.

Identification

Researchers pursuing approved research must clearly identify themselves to clients when carrying out research projects with clients.

- Students/interns should not identify their own research projects as Departmental research.
- Interns and researchers who are not DBH employees must not identify themselves as Department staff or use Department stationery.

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Research Policy, Continued

Handling Data

The researcher is responsible for the ethical and legal disposition of original data by ensuring that client identifying information is not disclosed, placed at risk during the course of the project, in any documentation, or reports resulting from the project.

Confidentiality

To ensure clients' rights are protected, the Researcher must complete and sign the Statement of Agreement (Assurance of Confidentiality)

Informed Consent

The researcher must have each Client that participates in the research project complete and sign a Documentation of Informed Consent form for the Chair of the Research Review committee. (The researcher should also keep a copy.) As required by Title 9 of the California Administrative Code, the consent affirms:

- No client or employee shall serve as a subject without his/her consent.
- The client must be told that the project is not part of his/her treatment, that participation is voluntary, and
- That he/she may terminate participation at any point.

Note: Audio or video recordings, including photos, require special permission of the RRC and an additional consent by the client. See SPM 3008: Release Form For Photographs/Videotapes

Violations

If violations of clients' rights arise, the chair shall recommend to the Director to suspend the project immediately.

Note: The project may be reinstated if a majority of the Committee members vote that the violations have been remedied, and the Director concurs.

Deadlines

Deadlines are as follows:

Event	Due
Project Completion	Within a year of the Director's approval signature
Findings	Within 60 days of project completion

Note: In special circumstances, the researcher may request additional time from the Committee via an explanatory letter.

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Research Policy, Continued

Project Reporting

To insure conformity to the approved design and to insure the protection of clients' rights, the researcher must provide monthly progress report to the assigned Committee contact person.

- Any problems or risks arising during the course of an approved project must be reported immediately to the Committee

Note: Failure to comply with this reporting will result in summary withdrawal of project approval.

Causes for Re-evaluation

The Committee must re-evaluate all projects:

- Not completed within one year of the Director's approval, or
- With changes to design, scope or implementation.

Publication

Researchers are encouraged to publish or present their results. Both DBH staff and outside researchers shall submit pre-publication versions of their manuscripts to the Research Review Committee.

Note: Researchers should make it implicitly and explicitly clear that the conclusions and opinions are those of the researcher, not those of the Department of Behavioral Health.

Negative Impact

If the Committee determines that the contents of a final report or manuscript could reflect on DBH in a negative manner, it will require that a specific disclaimer be included. The Committee will:

- Provide the wording for the disclaimer, and
- Apprise the Director of any potentially harmful implications.

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Research Policy, Continued

Common Reasons for Delays

Following are common reasons that may cause a delay in the application process:

- The research design is not fully explained or is inappropriate for the project, or the research questions do not arise from the literature review provided
- Inappropriate or unexplained statistical procedures are specified
- The experimental procedure will not answer the questions posed or clarify the status of the hypotheses stated.
- The application does not contain all tests, forms, and/or surveys that will be used with subjects or for data collection.
- A researcher-generated subject consent form is submitted that does not contain necessary information (see DBH's Consent Form).
- Experimental hypotheses are not clearly stated or are illogical, inconsistent, or contrary to the literature review.
- The applicant misestimates how much time will be required to obtain approval signatures from Program Managers.
- Post-research follow-up for clients who may be negatively impacted by their research participation is not proposed or covered in the design.
- The relevance or potential value of the research to clients, the Department, or the profession is unspecified, unclear, or unlikely.

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Research Application Procedure

Purpose

This document is to inform staff and prospective researchers about the procedure for submitting research proposals for evaluation by the Research Review Committee (RRC).

Application Procedure

The application procedure is as follows:

Step	Action
1	The prospective researcher will obtain an application packet (see Informational Letter for details) from the RRC secretary.
2	The researcher will submit the completed application to the RRC secretary
3	The RRC secretary will log the application packet and notify the RRC Chair
4	The RRC Chair will review the application for completeness. Is application complete? • If *yes*, go to step 5. • If *no*, return the application to the applicant.
5	The RRC secretary prepares and distributes copies of the application packet to the RRC members and schedules a meeting for them to discuss the proposal.
6	The RRC members meet to discuss the application and make recommendation for approval, revisions, or disapproval.
7	The RRC secretary notifies the applicant within two (2) weeks of the committee's decision. Was project approved? • If *yes*, the Chair will sign and return the Research Review and Approval form to the applicant. • If *no*, the applicant may respond to the committee's concerns in writing, including email for further review.
8	Upon receipt of Committee approval, the applicant must also obtain approvals from the Program Managers and Deputy Directors over sites and programs affected.
9	The researcher will return the completed Review and Approval form to the RCC secretary for submission to the Director or designee for final approval.

Additional Procedures for Students

Students submitting research proposals must provide a sponsorship letter to the RRC Chair on school letterhead indicating the intended research project "meets the requirements of the university". The chart below indicates which schools officials are authorized to provide letters:

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Research Application Procedure, Continued

Student	Authorized School Official
Undergraduate or general	Course Professor
Graduate	• Thesis/Dissertation Advisor, or • Major professor must sign the application

Psychology Interns

The follow explains procedures for psychology interns proposing research as part of their formal County Internship program:

Step	Action
1	Intern must obtain approvals from Program Managers and Deputy over sites and programs affected prior to initiating project.
2	Recommendation for approval to the Director will be provided by the following: **If Intern is …** / **Then the …** ***Not*** in contact with clients: • Psychology Training Coordinator, and • RRC Chair In contact with clients: • RCC

Related Documents

- DBH SPM 3008: Release Form For Photographs/Videotapes
- DBH SPM 6005:The Research Review Committee (RRC)