EXPEDITED REVIEW RECOMMENDATION STATEMENT

I.   RESEARCH PROPOSAL SUMMARY

Principal Researchers: Jake Cowan and Nancy LaVigne

Title: Mapping Network: An Action-Research partnership

Institution: The Urban Institute, Washington, DC

Type of Data: Aggregate-level data.

Subjects: All supervised parolees in the District as of a date to be determined based on availability of information.

Description: The researcher will use data on the location of ex-offenders in the District and data on the location and service capacities of agencies servicing ex-offenders to better understand where service gaps may exist and to develop a framework for developing a recurrently updated data set on the availability of services for ex-offenders. These data will be used for spatial analysis to determine the geographic distribution and demographic characteristics of prisoners and map the assets and risks of neighborhoods to which most prisoners return.

The Urban Institute is participating in this project through the Prisoner Reentry Mapping Network (RMN), which is funded by the National Institute of Justice and Annie E. Casey Foundation. Other RMN cities include Denver, Des Moines, Hartford, Indianapolis, Louisville, Milwaukee, Oakland, Providence, San Diego, Seattle and Winston-Salem. Data for this project also will be used for cross-site analysis.

This study pertains only to CSOSA.

II.   QUALIFICATION FOR EXPEDITED REVIEW

This is a request for aggregate-level data which poses no risk to individual parolees and does not require Agency additional resources to compile and deliver. Additionally, a request from The Urban Institute for the same data was approved in 2003 (see 03-01-Urban-CRoman and 03-01-Urban-CRoman-Addendum).

III.   RECOMMENDATION

The RRC recommendation for this study:

☐ Support   ■ **Support with Conditions**   ☐ Do Not Support

The RRC recommends support of this request with the following conditions:

CSOSA will provide to the researcher a Census Tract* table containing the following descriptive data:

- Number of FY03 parole/supervised release offenders;

- Number of FY03 parole/supervised release offenders by race/ethnicity;

- Number of FY03 parole/supervised release offenders by age (low, mean, median, high);

- Number of FY03 parole/supervised release offenders by gender;

- Number of FY03 parole/supervised release offenders by education level (less than 10, 10-12, Diploma, GED, College Exposure);

- Number of FY03 parole/supervised release offenders by marital status (Single, Common Law, Separated, Divorce, Widow);

- Number of FY03 parole/supervised release offenders by employment status (status as of September 30, 2003)

* Note that for census tract selection, the first known residence of parolee was used.

III.   SUPPORTING INFORMATION

Regulatory:

The proposed study is compliant with Federal regulations regarding the protection of human subjects as certified by the Urban Institute Institutional Review Board (Federal Assurance #0189) on February 9, 2004.

The proposed research shows no evidence of non-compliance with Agency policies pertaining to research.
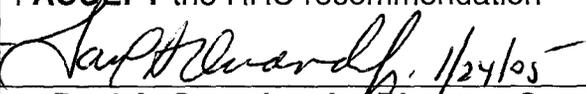
Benefits to Agency:

The proposed research is consistent with Agency priorities and/or interests as follows:

- Agency, practitioner and research communities would benefit from the development of a resource for more efficiently and effectively connecting parolees to services they need.

- Access to the RMN will enable the District to communicate readily with 11 other peer cities dealing with similar issues using similar approaches that could provide insight and perspective to current reentry issues.

Related Issues or Concerns:

- None

I ACCEPT the RRC recommendation	I DO NOT ACCEPT the RRC recommendation
[signature] 1/24/05	
Paul A. Quander, Jr. Director, Court Services and Offender Supervision Agency	
Comments:	

Jake Cowan
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TO: Research Review Board
DATE: October 13, 2004
SUBJ: Summary Statement and Privacy and Data Security Plans for Project: The Reentry Mapping Network - An Action-Research Partnership

(1) Summary Statement

A) <u>Names and Affiliations of Re</u>   ʰ⁻rs: Jake Cowan, Research Associate, Metropolitan Housing and Communities Policy Ce   ˦ Institute; Nancy Lavigne, Senior Research Associate, Justice Policy Center, The ᵀ

B) <u>Title of Study</u>: The Reenᵗ   *Original*   .esearch Partnership

C) <u>Purpose of Project</u>:

The purpose of this projeₒ   of ex-offenders in the District, and data on the location and service capaₒᵢ   .g ex-offenders, to better understand where service gaps may exist and to devₒᵣ   ork for developing a recurrently updated data set on the availability of services for ex-offeₒₙ s.

These data on ex-offenders and service providers will be used for spatial analysis to: (1) identify and depict the relationship of community assets and risks to concentrations of ex-prisoners; (2) generate problem solving from within the community and responsible service providers and agencies; and (3) inform decision making of better ways to build the capacity and stability of neighborhoods with high concentrations of ex-prisoners. The Urban Institute will determine the geographic distribution and demographic characteristics of prisoners, and map the assets and risks of the neighborhoods to which most prisoners return.

The location of programs and data on their service capacities will be acquired, drawing in part on information resources already in possession of the Urban Institute. Contextual data from the Urban Institute's DC Data Warehouse will also be used in this project, including data on the demographic and socio-economic characteristics of communities; property; health; education; social services (availability and use); and transportation. These data will be shared with CSOSA for use in this project, as well as other ongoing efforts of the Agency.

The Urban Institute's DC Data Warehouse is participating in this project through the NIJ and Annie E. Casey Foundation funded Prisoner Reentry Mapping Network (RMN). Other cities included in the RMN are: Denver, Des Moines, Hartford, Indianapolis, Louisville, Milwaukee, Oakland, Providence, San Diego, Seattle and Winston-Salem. As part of this project, data acquired for this project will also be used for cross-site analysis.

D) <u>Location of Project</u>: District of Columbia

E) <u>Duration of Study</u>: January 1, 2004 through May 31, 2005

F) <u>Research Methods To Be Employed</u>:
This project will aggregate data on all supervised ex-offenders in the District, as of a date to be determined based on availability of information. In addition, data about agencies providing services to ex-offenders, including location and service capacity, will be collected.

Concentrations of ex-offenders in the District will be compared to the location of services at the Block Group, Tract, Neighborhood Cluster and Ward levels. This examination of service capacities across District neighborhoods is not designed to assume that spatial proximity entails accessibility and usability, but rather to provide a basic understanding of where services are located and what their capacities are, and how location/capacity relates to areas with high concentrations of ex-offenders. This basic understanding can be used to identify key clusters of organizations in the network of service providers for ex-offenders, and also serve as a base for developing a system recurrently updated service capacity and availability information. The Urban Institute will meet with stakeholders on an ongoing basis to provide collected data in an accessible and useable form and to discuss its implications.

G) <u>Sample Type and Size Required and Time Frame for Sample Collection</u>:

We want to obtain a file with information on all supervised ex-offenders at CSOSA. For this data sharing agreement, we request that the ex-offender location data include a block group identifier. Data will also be aggregated to Tract, Neighborhood Cluster and Ward levels. Block Group level data is necessary for this initiative to develop connections between service-providing organizations in small-areas to understand and strengthen the network of services for ex-offenders. According to the 2000 Census, block groups in the District have an average population of 1,321, with an average 574 occupied housing units. The population of the average census tract in the District is 3,042, however, including an average 1,320 occupied housing units. Tract level data is broad for the analysis planned for this project, given the neighborhood variations that often exist within census tracts.

H) <u>Agency Staff and/or Resources Needed to Support the Study and Description of Support Needs</u>:

CSOSA individual that has knowledge of ex-offender records and can provide background information on the geocoding and validation of existing data files. The Urban Institute will provide technical support as needed to acquire the data. The specific variables requested, pending availability, are:

➢ Address at conviction or admission to prison, Address upon release (to be used only at the Block Group level of aggregation and above)
➢ Type of admission (New court commitment vs. new crime or technical parole violation)
➢ Date of admission
➢ Conviction charge (most serious conviction charge)
➢ Larger category of crime (e.g., violent, drug, non-violent, other)
➢ Felony level or class
➢ Minimum sentence length, Maximum sentence length
➢ Actual time served
➢ Reason for release (parole, court ordered, expiration of sentence, etc.)

- ➤ Release date
- ➤ Facility at time of release (e.g. prison, halfway house, etc.)
- ➤ Number of previous incarcerations
- ➤ Demographic data, including: Sex, Race, Date of Birth
- ➤ Occupation at admission
- ➤ Marital status at release, Number of children at release
- ➤ Education level at admission, Education level at release
- ➤ Substance abuse history
- ➤ In-prison program participation data, including: Drug/alcohol abuse treatment, Educational and vocational programming, Employment and work-release participation

I) Indication of Risk or Discomfort to Subjects as a Result of Participation:

All data collected will be maintained under the confidentiality provisions of our data security plan. Information collected will not be disclosed to the police, courts, probation, service providers, or anyone else. The ex-offenders will not be contacted as part of the research study; the intent is to aggregate addresses to examine areas of DC that have high concentrations of ex-offenders.

Collecting address information for the ex-offenders can benefit the clients themselves and the DC community in the long run. Understanding the location and capacity of services for ex-offenders can lead to the development of new programs and/or the redirecting of resources to target geographical areas most in need and focus service program on particular areas of high priority.

J) Anticipated Results:

The Urban Institute will work with the CSOSA and its Faith-Based Reentry Initiative to develop a system for updating service location and capacity data on agencies serving ex-offenders. This work will be based on a greater understanding of the spatial relationship of returning offenders and the services that they access.

The Urban Institute will also provide other general support and technical assistance to CSOSA's reentry planning efforts, drawing upon the resources of the Reentry Mapping Network.

K) Deliverables:

Maps, tables and graphs will be prepared that describe Block Group, Tract, Neighborhood Cluster and Ward level analysis results displaying the service locations and capacities of areas that have high concentrations ex-offenders. In addition, recommendations will be made for the development of a system to provide updated service location and capacity data on agencies serving ex-offenders. The Urban Institute will provide assistance in implementing these recommendations.

The Reentry Mapping Network will also produce an Assessment Report and Guidebook for the project funders. The report will contain information and examples from all RMN sites, including this DC-based project.

(2) Detailed Statement

A) <u>Review of the related literature</u>:

This year, another 600,000 people will be released from state and federal prisons across America,[i] and half of them are likely to return to prison within three years after their release.[ii] This aggressive cycle of arrest, removal, incarceration, and reentry – at levels four times higher than 20 years ago – has had profound consequences for a small number of communities around the country where policies related to incarceration and reentry are experienced most acutely. Consider the following:

- **A large proportion of prisoners come from just a few communities**. 20 percent of Ohio's state prisoners resided in 3 percent of Cuyahoga County's census block groups prior to their incarceration.[iii]

- **Whole segments of important population groups are virtually absent from some communities due to imprisonment**. One in every eight men of parenting and prime working age from some Brooklyn neighborhood blocks are arrested and sent to prison or jail each year.[iv]

- **Post-release supervision is concentrated in certain communities, and supervised populations are more likely to become involved again in the criminal justice system**. In 2000, 75 percent of San Diego's parolees reside in 11 percent of all of the city's zip codes, with similar proportions experienced by Los Angeles and San Francisco.[v]

- **A small number of neighborhood blocks account for a significant proportion of incarceration costs**. In one year alone, the costs of incarcerating residents from a single block in a Brooklyn neighborhood exceeded one million dollars.[vi]

Clearly, prisoner reentry is an important phenomenon affecting communities in a variety of ways. However, the patterns and distribution of reentry are not well understood, and a greater knowledge of them would help local policymakers and service providers develop more efficient and effective interventions.

One powerful means of understanding the effects of social phenomena on community well being is through mapping. Tested in a number of environments, mapping community-level data has proven to be an effective method for helping community members and local leaders better understand the nature of a variety of community problems.[vii] Maps graphically illustrate concentrations and patterns so that people can quickly see and understand the relationships between certain phenomena and the characteristics of their community. The results of such efforts have stimulated neighborhood-level organizing and capacity-building as well as citywide initiatives and policy change. For example, the mapping of community-level data supported efforts to: improve child daycare services in Boston; create a service delivery system for child protective services in Cuyahoga County, Ohio; integrate social services for youth around schools in Oakland; and target a new parents program in Milwaukee in areas where it was most needed.[viii]

Prior research has highlighted important aspects of incarceration and prisoner reentry that will guide the focus and the data-collection strategy employed by RMN sites.

Prisoners Come from and Return to a Small Number of Neighborhoods

Over the last decade, a rising proportion of released prisoners have settled into communities located in the central sections of U.S. cities.[ix] Examined at a more localized level, a growing number of these ex-prisoners return disproportionately to only a few neighborhoods within these central sections.[x] Incarceration and reentry are significantly altering the social and economic landscapes within just a few communities in each area. Knowledge of these concentrations is critical to ensuring that sufficient and effective support is targeted to the communities where the costs and consequences of incarceration and reentry are most heavily born.

Returning Prisoners have Low Human Capital

Current research findings offer evidence of some impacts of reentry on ex-prisoners, their families, and their communities. Most released prisoners return home with low levels of human capital, as illustrated by the following factors:

- **Reduced employability.** Many ex-prisoners have unstable employment records and their job skills have limited marketability.[xi] Adding to these barriers, ex-prisoners often lack the necessary identification to secure employment; are increasingly barred from certain types of jobs; and are faced with a decreasing availability of low-skill jobs.[xii]

- **Substance Abuse.** Most prisoners face difficulties with substance abuse upon release. Nearly two-thirds of prisoners report a history of substance abuse, and 52 percent of prisoners reported consuming drugs and/or alcohol at the time of their arrest.[xiii]

- **Health problems.** Released prisoners suffer disproportionately from health-related problems and can pose health risks to their family members, intimate partners, and communities. Prisoners experience infectious diseases of HIV/AIDS, hepatitis C, and TB at rates five to ten times higher than those of the general public;[xiv] and 16 percent are estimated to suffer from mental illness.[xv] These illnesses may also hinder a released prisoner's ability to secure employment.

- **Few financial resources and significant financial obligations.** Most prisoners are released with little or no cash assistance unless supplied by family or friends.[xvi] At the same time, many parolees are required to begin making payments to the Department of Parole and to begin re-paying any owed child support after release. One study at a Massachusetts House of Correction found that nearly 25 percent of prisoners owed an average of $17,000 in child support.[xvii]

- **High likelihood of recidivism.** Most former prisoners will become involved in the criminal justice system again: 2 out of every 3 ex-prisoners are re-arrested and 1 out of every 2 ex-prisoners are re-incarcerated within three years of release.[xviii]

A clear pattern emerges from these findings: released prisoners return to their neighborhoods and families with tremendous needs and substantial challenges.

Prisoners Return to Disadvantaged Communities

Given the challenges that ex-prisoners face upon release, the support and assistance that they require to reintegrate back into society is tremendous. However, released prisoners often return to communities that are among the least able to provide this needed support and assistance. In the absence of such support, the lure of the readily available funds generated by criminal activity may

be great, and the costs of that activity will likely be born by the communities in which the ex-prisoners reside.

In addition to economic disadvantages, these communities also lack strong social mechanisms that reinforce pro-social behavior. These communities tend to have low levels of social cohesion among residents and norms that are too weak to be effective at eliciting positive behavior. A community without strong norms, social trust, and informal social control mechanisms has difficulty in providing the support, resources, and guidance that can help members disengage in anti-social behavior and criminal activity.[xix]

From Reentry Maps to Community Action Plans

This prior research informs us of reentry patterns and correlates in general, but what more can mapping tell us about the reentry phenomenon, and how might it guide policy development at the local level? The utility of reentry mapping is best illustrated through the types of questions this method might help answer.

Where are prisoners returning? Mapping can help identify areas that experience high concentrations of prisoners returning home. Mapping the last known addresses of released inmates (available through the departments of correction in most states) can pinpoint concentrations within cities and neighborhoods, right down to the city block. This information then equips local policy makers and community organizers with the capacity to target intervention efforts and resources in the areas that most need them.

Where are different types of prisoners returning? Because the use of a Geographic Information System (GIS) enables spatial analysis across a variety of variables of interest, one can not only map where inmates are returning, but may also explore what types of inmates are returning to specific neighborhoods. For example, The Center for Community Safety in Winston-Salem, North Carolina mapped the return of inmates to Winston-Salem, North Carolina, by age range. Local policy makers were interested in exploring the extent to which younger offenders might cluster in different neighborhoods than older offenders. The map indicated that younger ex-prisoners appear to be clustered in the city's center. This information could guide the placement of a resources and services for youthful offenders in this city.

What services, programs, and support networks are needed and to what extent are they available in the areas where ex-prisoners are returning? One of the most useful applications of spatial analysis as a policy tool is the generation of maps to guide the allocation of resources. Mapping released prisoners in conjunction with services available to them can illustrate areas in which there are adequate services in close proximity to where the majority of inmates return. Such mapping can also detect whether there is a "service delivery mismatch," in which services exist but are not easily accessible.

An example that illustrates how reentry mapping might guide service delivery is the need for safe and affordable housing for returning prisoners. Many prisoners have no housing available to them after their release and have no remaining ties to family and friends on the outside. These housing challenges are exacerbated when prisoners return to their old neighborhoods only to find that there are no shelters or affordable housing options for them. Mapping the locations of shelters, halfway houses, and other affordable housing in relation to where inmates return can illustrate the extent of this problem and provide guidance in choosing an appropriate site for new housing options for releasees.

Identifying areas with high concentrations of returning prisoners may also help guide service delivery for the families of returning inmates in these neighborhoods. In addition, mapping may help focus law enforcement and parole efforts to mitigate the public safety risks associated with high populations of released prisoners.

What are the neighborhood characteristics in areas with high concentrations of releasees?

Identifying and responding to the challenges of prisoner reentry requires an understanding of the nature of the communities to which prisoners return. Thus, examining neighborhood indicators representing both basic demographics and the welfare of the community (such as housing tenure, percentage of female-headed households, vacant housing, education attainment, marital status, fertility, infant mortality, place of birth, language, and ancestry) can aid in developing a measure of social capital, which will help determine the extent to which communities are equipped to address the challenges that prisoner reentry creates.

How can mapping help measure the success of a reentry intervention?

Mapping can also serve as a tool for assessing the effectiveness of intervention efforts. For example, if an intervention involves attracting new businesses to a community with high concentrations of returning inmates, mapping the change in employment rates over time can provide evidence that the business is having a positive impact on employment compared to other areas in the city. While this information cannot provide a basis for causal inferences, it can provide an indication as to whether or not a targeted effort was likely to have produced the desired outcome.

Both the research reviewed above and the examples of reentry mapping applications underscore the importance and value of understanding the effects of incarceration and reentry on communities. Further research is needed, however, to analyze a wider range of community indicators (such as housing vacancies, reentry services, employment opportunities, and child-support compliance rates) in order to provide a more comprehensive understanding of these phenomena and their effects. Equally important is applying such analyses to a wider range of cities in order to enhance the utility of the findings by describing a broader array of experiences and circumstances.

B) <u>Detailed description of the research method:</u> *(see Section F, Page 2)*

C) <u>Significance of anticipated results and their contribution to the advancement of knowledge:</u>

The rising number of prisoners returning home each year continues to pose challenges to communities throughout the U.S., and in particular to the country's most disadvantaged communities. To effectively address these challenges, local policymakers and practitioners must understand the particular characteristics and trends occurring within their areas. But to date, research knowledge of prisoner reentry is largely limited to analyses of aggregated data at the national, state, and city level, which could obscure a range of impacts occurring at a more localized level. The mapping and analysis of community level data can guide local policymaking. In Oakland, for example, partners have used mapping to integrate social services around schools; similarly, a mapping the locations of returning prisoners could inform efforts to provide "one-stop-shopping" services for ex-offenders close to where they live.

D) Benefits of research and/or participation to CSOSA/PSA:

A major benefit of participation for CSOSA is the development of a resource for more efficiently and effectively connecting ex-offenders to the services they need. In addition, having access to the Reentry Mapping Network will open ready communication lines to eleven other peer cities dealing with similar issues using similar approaches that can provide insight and perspective to current reentry issues in the District.

E) Specific resources required from the Agency: *(see Section H, Page 2-3)*

F) Description of all possible risks, discomforts, and benefits to individual subjects or a class of subjects, and a discussion of the likelihood that the risks and discomforts will actually occur: *(see Section I, Page 3)*

G) Description of steps taken to minimize any potential risks or discomforts:

In order to minimize the risk of identifying individuals included in the database, all members of the Urban Institute research team will adhere to the following confidentiality measures. First, all Urban Institute Staff who will be handling the data will sign and abide by a Staff Confidentiality Pledge. The project will maintain a notebook of signed confidentiality pledges for all project staff.

The data to be secured include: (1) diskettes or CDs with records, (2) computerized files.

Diskettes or CDs will be stored in locked file cabinets. Access to these files will be limited to personnel who have signed the Confidentiality Pledge. Non-identifiable data will be transmitted via email and identifiable data will be delivered in-person or sent via Federal Express.

Electronic material will be stored in password-protected files, and access privileges and passwords will be made available only to the appropriate staff members. We will maintain logs to keep track of the transfer of electronic files containing confidential data. In accordance with our IRB's guideline, we will log each item received or created into a log book, and note where and how it is being stored. We will also log when items are transferred between staff members, and when items are destroyed. Electronic media (e.g., diskettes, tapes, CD-ROMs) will be labeled as "confidential" and stored in locked cabinets. Confidential electronic files will not be stored on shared network drives, but will be used on secure hard-drives.

The principal investigator will designate a specific person on the UI research team—Meagan Funches—to be responsible for data security reviews. She will conduct unannounced checks to ensure that all project staff are complying with this data security plan—e.g., appropriately locking sensitive hard-copy files and using password-protection measures for computer files.

H) Description of physical and/or administrative procedures to be followed to: 1) ensure the security of any individually identifiable data that are being collected for the project; and 2) destroy research records or remove individual identifiers from those records when the research has been completed:
CSOSA identifier information will be replaced with a UI code number (unique identifier) that cannot be linked to an individual. This will be done after the data are cleaned to determine if there

are any duplicate records. The master list linking the DOC numbers to the UI code numbers will be password protected and kept only as an electronic copy file under lock and key in Jake Cowan's office (number 7129). Similar procedures will be used for address fields/variables. Address variables for the releasee and parolee data when received at the Urban Institute will be geocoded into latitude and longitude and then stripped from the data file and placed in a separate file on diskette with only a unique identifier (therefore the file with the arrestee address will only have one other variable associated with it) and kept under lock and key in Jake Cowan's office. A separate diskette file linking the address data back to the rest of the data will be established and stored in a separate place in Jake Cowan's office. All files will be password protected. The full file linking releasee or parolee's address to the rest of the data will only be used to geocode the data. Again, once the address data have been geocoded, the address variable will be stripped from the database, just leaving the latitude and longitude coordinates in the file. Although latitude and longitude represent an address, this method is considered less of risk than keeping actual addresses on file.

Data processing will be performed on a password-protected personal computer. Access to data files on the computer will be restricted to authorized research staff members who have signed the Pledge of Confidentiality. Original and linking files will be destroyed two years after the completion of this project.

I) <u>Description of any anticipated effects of the research project on Agency programs and operations</u>:

This research project will create another resource for CSOSA to use in managing the reentry of ex-offenders to the community. A recurrently updated services information utility will enhance CSOSA's ability to connect ex-offenders to the services they need.

J) <u>Relevant research materials such as vitae, endorsements, descriptions of similar work undertaken, sample informed consent statements, questionnaires, and interview schedules</u>:

See Attachments.

K) <u>Statement indicating that copies of all deliverables will be provided to CSOSA/PSA</u>; and

Copies of all deliverables created for this project will be provided to CSOSA.

L) <u>Statement that copies of any datasets will be provided to CSOSA/PSA at the conclusion of the project</u>:

All datasets used for this project will be provided to CSOSA.

PRIVACY AND DATA SECURITY CERTIFICATION

In order to ensure confidentiality and data security, all research activities will be conducted in compliance with the requirements of 28 C.F.R. Part 22; and pursuant to CSOSA Sensitive Offender File Information Policy, PSA Confidentiality Guidelines, Management and Administration Division Directive 500.2; D.C. Official Code §§ 7-1201 et seq. (mental health information); D.C. Official Code §§ 7-302 and 7-1605 (2001 Edition) (HIV/AIDS confidentiality); and 42 C.F.R. Part 2 (confidentiality of drug and alcohol treatment records).

As the Principal Researchers, we will adhere to the privacy and data security requirements as detailed in this certification document, as well as all aspects of our data security plan as described in our summary and detailed statements.

We certify that:

1. Data identifiable to a private person will not be used or revealed, except as authorized in the laws, policies and regulations referenced above.

2. Any private person from whom identifiable information is to be collected or obtained shall be notified, in accordance with laws, policies and regulations referenced above, that such data will be used or revealed only for research or statistical purposes and that compliance with the request for information is not mandatory and participation in the project maybe terminated at any time. In addition, we certify that where findings in a project cannot, by virtue of sample size or uniqueness of subject, be expected to totally conceal the identity of an individual, such individual shall be so advised.

3. Access to the data will be limited to those project staff having a need for such data and that such persons shall be advised of and agree in writing to comply with the laws, policies and regulations referenced above.

4. All staff, contractors, subcontractors, and consultants requiring access to identifiable data will agree, through conditions in their subcontract or consultant agreement, to comply with the requirements of laws, policies and regulations referenced above, regarding information transfer agreements. We also certify that CSOSA/PSA will be provided with copies of any and all transfer agreements before they are executed as well as the name and title of the individual(s) with the authority to transfer data.

5. Adequate precautions will be taken to ensure administrative and physical security of identifiable data and to preserve the confidentiality of the personally identifiable information.

6. If applicable, a log will be maintained indicating that 1) identifiable data have been transferred to persons other than employees of CSOSA/PSA and/or researcher staff, contractors, and subcontractors; and 2) such data have been returned or that alternative arrangements have been agreed upon for future maintenance of such data, in accordance with laws, policies and regulations referenced above.

7. Project plans will be designed to preserve the confidentiality of private persons to whom information relates, including where appropriate, name-stripping, coding of data, or other similar procedures.

8. Copies of all questionnaires that have already been designed for use in the project are attached to this Privacy and Data Security Certificate. The researcher also must certify that any questionnaires developed during the project period will be provided to CSOSA/PSA prior to being administered.

9. Project findings and reports prepared for dissemination will not contain information which reasonably can be expected to be identifiable to a private person, except as authorized by the laws, policies and regulations referenced above.

10. All project staff, contractors, subcontractors, and consultants have been advised of and have agreed, in writing, to comply with all procedures to protect privacy and the confidentiality of personally identifiable information.

11. Pursuant to the requirements in 28 C.F.R. Part 22, and pursuant to D.C. Official Code §§ 7-1201 et seq. (mental health information), D.C. Official Code §§ 7-302 and 7-1605 (2001 Edition) (HIV/AIDS confidentiality, and 42 C.F.R. Part 2 (confidentiality of drug and alcohol treatment records); the following safeguards are incorporated into the project plan and attached to the Privacy and Data Security Certification:

(a) Procedures to notify subjects, or, if notification is to be waived, a justification must be provided.

(Ex-offenders will not be contacted as part of this research study.)

(b) Procedures developed to preserve the confidentiality of personally identifiable information.

(c) Justification for the collection and/or maintenance of any data in identifiable form, if applicable.

(d) Procedures to insure the physical and administrative security of data, including, if applicable, a description of those procedures used to secure a name index.

(e) Description of any institutional limitations or restrictions on the transfer of data in identifiable form, if applicable.

(f) Procedures for data storage.

(g) Procedures for the final disposition of data.

(h) Name and title of any individual(s) with the authority to transfer data to the Agency or among project staff, contractors, subcontractors, and consultants to whom data access is restricted.

(i) Name and title of individual authorized to determine the final disposition of data.

(j) Name and title of any project staff, contractors, subcontractors, and consultants to whom data access is restricted.

12. The Agency shall be notified of any material change in any of the information provided in this Privacy and Data Security Certification.

13. It is our responsibility to ensure that the conduct of staff, contractors, subcontractors, and consultants working on this project complies with the conditions outlined under this agreement.

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[i] *Lynch, James P., and William J. Sabol. 2001. "Prisoner Reentry in Perspective." Washington, D.C.: Urban Institute.* Crime Policy Research Report.
[ii] *Langan, P.A., and D. J. Levin. 2002.* Recidivism of Prisoners released in 1994. *Washington, D.C.: U.S. Department of Justice,*

Bureau of Justice Statistics Special Report.

[iii] *Lynch, James P., and William J. Sabol. 2001. "Prisoner Reentry in Perspective." Washington, D.C.: Urban Institute.* Crime Policy Research Report.

[iv] *Analysis by E. Cadora and C. Swartz for the Community Justice Project at the Center for Alternative Sentencing and Employment Services (CASES), 1999. For more information, visit http://www.communityjusticeproject.org/. As cited in Travis,* Jeremy, Amy L. Solomon, and Michelle Waul. 2001. From Prison to Home: The Dimensions and Consequences of Prisoner Reentry. *Washington, D.C.: Urban Institute Press, p. 41.*

[v] *Waul, Michelle; Travis, Jeremy. 2002. "Planning for Reentry in San Diego." Paper prepared for a meeting of the San Diego Reentry Roundtable, April.*

[vi] *Cadora, Eric. 2002. "Criminal Justice and Health and Human Services: An Exploration of Overlapping Needs, Resources, and Interests in Brooklyn Neighborhoods." Paper presented at the National Policy Conference, Bethesda, Maryland, January 30-31.*

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[viii] Ibid.

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