



DISTRICT OF COLUMBIA
COURT SERVICES AND OFFENDER SUPERVISION AGENCY &
PRETRIAL SERVICES AGENCY
RESEARCH REVIEW COMMITTEE

RECOMMENDATION STATEMENT

DATE: September 11, 2008

I. RESEARCH PROPOSAL SUMMARY

Principal Researcher: David Huffer (Senior Statistician), under the direction of Calvin Johnson, CSOSA Director of the Office of Research and Evaluation (ORE).

Title: The CSOSA Recidivism Tracking Project - Expansion

Institution: CSOSA, ORE, Washington, DC

Summary of Request: This request by Calvin Johnson is to expand ORE's agency-research to conduct regular assessment of CSOSA's recidivism rates (See Attachment A). The RRC recommended support of the study in August 2005 (see attachment B). Specifically, the current request seeks approval for David Huffer (Senior Statistician, ORE) to expand the above-mentioned assessment that will produce an additional Agency-focused deliverable that also will be included as part of his dissertation. A summary of the study expansion is attached (Attachment C).

This request pertains only to CSOSA.

Dr. Johnson recused himself from RRC review of this request.

II. RECOMMENDATION

The RRC recommendation for this study:

Support **Support with Conditions** Do Not Support

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

- As an extension of the existing RRC approved project, the researcher would be required to follow the approved methodology, data collection/data security plan, and privacy protection approach adopted by ORE for the purposes outlined in the original request (see attachment D). The researcher has executed the Human Subjects Protection Form, the

**CSOSA/PSA RESEARCH REVIEW COMMITTEE
EXPEDITED REVIEW RECOMMENDATION STATEMENT**

Requirements Form, the Intellectual Property Provision Form, and the Reporting Progress and Publishing Findings Form, as required by Agency policy (See Attachment E).

I **ACCEPT** the RRC recommendation

I **DO NOT ACCEPT** the RRC recommendation

Adrienne Poteat., Acting Director, Court Services and Offender Supervision Agency

Comments:

A

August 3, 2008

Research Review Committee
633 Indiana Avenue NW
Washington, D.C. 20004

Dear Committee Members,

CSOSA's Office of Research and Evaluation (ORE) submitted an agency-research request to conduct regular assessment of CSOSA's recidivism rates, for which the RRC recommended support of the study (see attachment A). This evaluation project, though only in its initial stage, has shown great promise with respect to data collection efforts that will lend itself to more advance data mining activities and potential joint project development with the Bureau of Justice Statistics. Together, these data along with partnerships with other federal agencies will inevitably lead us to more rigorous research on the correlates of recidivism while under community supervision.

The reason for this correspondence is to seek approval for David Huffer (Senior Statistician, ORE) to expand the above-mentioned assessment that will produce an additional Agency-focused deliverable that also will be included as part of his dissertation. A summary of the study expansion is attached (Attachment B). Specifically, David would investigate the correlates of offenders (probationers only) observed to have persistent technical violating behavior. Because the assumption is that persistent technical violators are at greater risk of supervision failure, his project is a natural fit under the Recidivism Study already approved by the RRC. As an extension of the existing RRC approved project, David's project would be required to follow the approved methodology, data collection/data security plan, and privacy protection approach adopted by ORE for the purposes outlined in the original request (see attachment C). Further, any publication other than the dissertation would follow the requirements outlined in the research policy.

If you should have any questions, then please do not hesitate to contact me at (202) 220-5332 or calvin.johnson@csosa.gov.

Sincerely,

[signed]

Calvin C. Johnson, PhD
Director, ORE



B

DISTRICT OF COLUMBIA
COURT SERVICES AND OFFENDER SUPERVISION AGENCY &
PRETRIAL SERVICES AGENCY
RESEARCH REVIEW COMMITTEE

EXPEDITED REVIEW RECOMMENDATION STATEMENT

DATE: August 11, 2005

I. RESEARCH PROPOSAL SUMMARY

Principal Researcher: Calvin C. Johnson, CSOSA Director of the Office of Research and Evaluation (ORE) and Project Lead; and Michelle Pelzer (Program Analyst) and David Huffer (Senior Statistician) as primary research staff

Title: The CSOSA Recidivism Tracking Project

Institution: CSOSA, ORE, Washington, DC

Type of Data: Aggregate-level data.

Subjects: To support the measurement CSOSA's primary outcome measures, the study will assess recidivism data for yearly cohorts of offender samples. Each cohort will be tracked for a period not to exceed three years from the point of CSOSA intake and discharge.

Description: The primary objectives of this project are:

1. Document the three-year recidivism patterns for an offender intake cohort,
2. Document the three-year recidivism patterns for an offender discharge cohort,
3. Conduct data mining exercises to determine the utility of existing records data in segmenting offenders within cohorts into groups based on probability of recidivism

Recidivism will be measured using three distinct indicators: arrest for a new charge, conviction of a new charge, and incarceration for a new charge.

We expect that these exercises will produce exploratory findings that begin to highlight those community supervision-related factors that are associated with recidivism during reentry and up to three years thereafter.

This study pertains only to CSOSA.

**CSOSA/PSA RESEARCH REVIEW COMMITTEE
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II. QUALIFICATION FOR EXPEDITED REVIEW

This is a request for aggregate-level data which poses no risk to individual offenders and does not require Agency resources in excess of those already allocated toward ORE staffing.

III. RECOMMENDATION

The RRC recommendation for this study:

Support Support with Conditions Do Not Support

The RRC recommends support of this request as described in the researcher's proposal.

III. SUPPORTING INFORMATION

Regulatory:

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:

- These analyses will serve as the starting point for CSOSA executive staff to begin discussions about strategic operations and programming activities that target the precursors to recidivism.
- This research will provide ongoing monitoring and tracking of performance on CSOSA's key outcome measure - recidivism.
- The initial study years will only produce findings associated with a limited number of covariates. As we continue to construct samples and collect associated recidivism data, we expand analyses to focus on program participation and other supervision support factors.

Related Issues or Concerns:

- None

**CSOSA/PSA RESEARCH REVIEW COMMITTEE
EXPEDITED REVIEW RECOMMENDATION STATEMENT**

I ACCEPT the RRC recommendation	I DO NOT ACCEPT the RRC recommendation
<i>P. A. Quander, Jr. 8/25/05</i>	
Paul A. Quander, Jr., Director, Court Services and Offender Supervision Agency	
Comments:	



Courtesy
Court Services and Offender Supervision Agency
for the District of Columbia

Office of Research and Evaluation

MEMORANDUM

To: Calvin C. Johnson, Co-chair, RRC
Claire Johnson, Co-chair, RRC
From: David Huffer, Senior Statistician, ORE
Date: Tuesday, May 27, 2008
Subject: **Request for research**

I am currently Candidate for the Doctor of Philosophy in Criminology and Criminal Justice at the University of Maryland College Park, College Park, Maryland, and this document expresses my interest in conducting research bearing on community offenders supervised by the CSOSA in partial fulfillment of this degree.

This research extends the existing RRC approved Recidivism study submitted by the ORE to an area of recidivism research not well represented in the literature and not already included in the study including both legal and supervision-specific features of negative supervision performance. This includes, specifically, whether probationers in the population test positive, provide a bogus specimen, or fail to appear for any drug testing event as well as whether and, if so, how often they test positive for each of the seven substances (viz., alcohol, methadone, amphetamine, cocaine, marijuana, opiates, and phencyclidine) screened by the CSOSA; whether and, if so, how soon offenders are ultimately convicted given an arrest for a new crime during both the supervision period and the follow-up period; whether and, if so, how often supervision- and drug-related violations occur; and whether and, if so, how soon offenders ultimately terminate sentences unsuccessfully.

This research will include only a subsample of those offenders already included in the ORE Recidivism study. These are, namely, approximately 200 male probationers randomly selected from among those offenders terminating community sentences during the interval beginning January 1, 2004, and ending December 31, 2004. This observation period overlaps with the existing Recidivism study.

Upon request, I will submit the necessary RRC supporting documents.

Thank you for your consideration.

cc: Jaime Lowe, Staff Assistant, ORE

encl: None

D

05-08

(1) Name(s) and current Agency and Agency component of the employee(s) conducting the research;

Calvin C. Johnson
Community Justice Programs
Office of Research and Evaluation
633 Indiana Avenue NW, 13th Floor
Washington, D.C. 20004
(202) 220-5332
Calvin.Johnson@csosa.gov

(2) Title of the study

The CSOSA Recidivism Tracking Project

(3) Purpose of the project

To support the measurement CSOSA's primary outcome measures, the Office of Research and Evaluation will assess recidivism data for yearly cohorts of offender samples. Each cohort will be tracked for a period not to exceed three years from the point of CSOSA intake and discharge. Recidivism will be measured using three distinct indicators: arrest for a new charge, conviction of a new charge, and incarceration for a new charge. Whenever possible, we will report separately those arrests, convictions, and periods of incarceration associated with violation of term of community supervision.

The primary objectives of this project are:

1. document the three-year recidivism patterns for an offender intake cohort,
2. document the three-year recidivism patterns for an offender discharge cohort,
3. conduct data mining exercises to determine the utility of existing records data in segmenting offenders within cohorts into groups based on probability of recidivism

We expect that these exercises will produce exploratory findings that begin to highlight those community supervision-related factors that are associated with recidivism during reentry and up to three years thereafter. Specifically, these exercises will (1) produce descriptive comparisons ('recidivators' v. 'non-recidivators') on demographic, program participation, and technical violation data, and (2) produce bivariate statistical analyses that begin to highlight the effect of specific supervision components on recidivism.

These analyses will serve as the starting point for CSOSA executive staff to begin discussions about strategic operations and programming activities that target the precursors to recidivism.

(4) Location of the project

The project will be conducted at 633 Indiana Avenue NW and 300 Indiana Avenue NW.

(5) Research methods to be employed

The Office of Research and Evaluation will incorporate a mix of quantitative and qualitative data collection methods include sampling of offender cohorts and assessment of online national criminal history checks. Qualitative data collection will support our understanding of the quality of data used to complete this study. Specifically, we will follow-up with CSOSA staff familiar with relevant records data regarding limitations that must be considered.

As mentioned above, the data will be analyzed using descriptive and/or multivariate statistics. After extraction of the cohort samples, we will conduct criminal history records check for each member of the cohort. These data will be used to construct separate criminal history databases for each cohort.

(6) Anticipated results

This research will provide ongoing monitoring and tracking of performance on CSOSA's key outcome measure. With preliminary analysis to focus on identifying correlates of recidivism, we hope that the findings will highlight areas of opportunity to target for intervention those underlying factors associated with supervision failure.

(7) Duration of the study

This project ~~Each~~ each fiscal year in support of CSOSA's performance measurement and budget activities.

(8) Sample size required and/or time frame for sample collection

When appropriate, the Office of Research and Evaluation will employ sampling techniques to determine effective strategies required to generalize findings to the overall offender population. All offender-related data will be extracted from archived versions of SMART (starting FY03). Criminal history data will be compiled using online systems maintained by the FBI.

All data will be analyzed using an identification code that protects the identity of all respondents and associated data. The identification code is a linkable value that requires

a level of access not offered to staff outside OIT/ORE.

(9) Number of agency staff needed to support the study and description of the support needs

1. Calvin C. Johnson (Project Lead) will direct the implementation of study methods and analytical approach.
2. David Huffer (Senior Statistician) will lead sampling extraction and statistical analysis.
3. Michelle Pelzer (Program Analyst) will conduct criminal history data extraction.
4. Dwight Estrill (Program Analyst) will design the criminal history database.
5. Jenny Mlinarcik (Statistician) will provide data entry and analysis support.
6. Heather Fogg (Research Intern) will provide data entry support.

(10) Specific resources required from the Agency

Most of the Agency resources required to implement this project are already in place. Specifically, we will need to have ongoing connectivity to the ORE server that contains monthly instances of SMART (backup copies) as well as nightly SMART backups. Whenever we experience database-related problems, we will need to coordinate corrective actions with Database Administrator in CSOSA OIT. We will need CSOSA OIT staff to ensure that statistical and statistical support applications are accessible and available for use between normal business hours. Finally, we will need to have IT security issues associated with NCIC and Triple-I criminal history check addressed in a timely manner. Establishing a backup account for an ORE staff member may allow the criminal history component of the project to operate with limit disruptions.

(11) Description of any anticipated effects of the research project on Agency programs and operations

As mentioned above, we anticipate producing initial findings that highlight community supervision-related factors that are associated with recidivism during reentry and up to three years thereafter. The initial study years will only produce findings associated with a limited number of covariates. As we continue to construct samples and collect associated recidivism data, we expand analyses to focus on program participation and other supervision support factors.

(12) List of deliverables

1. Evaluation Updates (yearly)
2. Special Topic Studies (yearly – when approved by AD for Community Justice)

3. Programs)
Summary Findings for FY Congressional Budget Justification (Performance
Budget Sections)

HUMAN SUBJECTS PROTECTION

David Huffer

Name and Affiliation of Principal Researcher(s)

Prison-antecedent community supervision

Title of Research Project Covered Under This Agreement

Note: All references to the "IRB" in this statement refer to the Institutional Review Board that reviewed and approved the abovementioned research.

As the Principal Researcher:

1. I am familiar with the U.S. Department of Health and Human Services (HHS) regulations for the protection of human subjects (45 C.F.R. Part 46).
2. I understand and accept the responsibility to comply with the standards and requirements stipulated in the above document and to protect the rights and welfare of human subjects involved in research conducted under this Agreement.
3. I will abide by all determinations of the IRB and will accept the final authority and decisions of the IRB, including, but not limited to, directives to terminate participation in designated research activities.
4. I will report promptly to the IRB and to the CSOSA/PSA primary point of contact for the research project any proposed significant changes in the research conducted under this Agreement.
5. I will not initiate changes in the research without prior IRB review and approval, except where necessary to eliminate apparent immediate hazards to subjects.
6. I will report immediately to the IRB and to the CSOSA/PSA primary point of contact for the research project any unanticipated problems in the research project that involve risks to subjects or others.
7. If required, I will seek, document, and maintain records of informed consent from each subject or the subject's legally authorized representative as required under HHS regulations and stipulated by the IRB; and/or as required by the Agency.
8. I acknowledge and agree to cooperate in the IRB's responsibility for initial and continuing review, record keeping, reporting, and certification. I will provide all

information requested by the IRB and the CSOSA/PSA Research Review Committee in a timely fashion.

9. I will not enroll subjects in research under this Agreement prior to the review and approval of the project by the IRB and the CSOSA/PSA Research Review Committee.
10. I acknowledge that my primary responsibility is to safeguard the rights and welfare of each research subject, and that the subject's rights and welfare must take precedence over the goals and requirements of the research.
11. I understand that any CSOSA/PSA site may have unique rules and requirements, and I agree to abide by the rules and requirements of the facilities where I conduct my research.
12. I understand that it is my responsibility to ensure that the conduct of researchers (employees, students, and/or contractors) working on this project complies with the conditions outlined under this agreement.

Signature(s):


Principal Researcher

2008 - AUG - 12

Date

Co-Principal Researcher

Date

CONFIDENTIALITY ASSURANCE

DAVID HUFFEN

Name and Affiliation of Principal Researcher(s)

Risk - Anticipation Community Supervision

Title of Research Project Covered Under This Agreement

Research project staff has an obligation to research subjects from whom we gather personal information to protect their identities and the information they provide to the researcher. We will conduct any research activities in compliance with the requirements of 28 C.F.R. Part 22; and pursuant to CSOSA Sensitive Offender File Information Policy, Management and Administration Division Directive 500.2; PSA Confidentiality Guidelines; 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 identity of persons interviewed and the related data are to remain confidential and disclosure of identities and related information is strictly forbidden. Contents of interviews are not to be discussed with anyone except project staff, and only as it is necessary to complete the assigned work. Additionally, sensitive interview information should not be discussed anywhere it could be overheard by persons who are not authorized to know this information. Additional special conditions apply to the disclosure of mental health, HIV/AIDS, and drug and alcohol treatment records and information and are included within the provisions below.

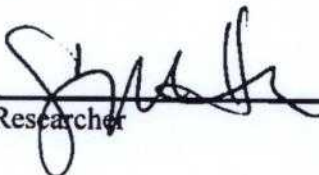
As the Principal Researcher:

1. I agree to protect the confidentiality of all information identifiable to a private person that is collected in the conduct of my work for the project.
2. I agree to not disclose or discuss any identifiable information that is learned during the course of my employment as project staff, contractor, or subcontractor anyone, including an employer, other than project staff members who have a need to know this information; nor in any research products.
3. I agree that I have been informed that CSOSA/PSA require that the research is compliant with 28 C.F.R. Part 22 and 45 C.F.R. Part 46, which govern the use and revelation of research and statistical information identifiable to a private person, and that the researcher, as an member of the project staff also must comply with these regulations.

4. I agree not to disclose any information regarding a subject's mental health and HIV/AIDS records without written voluntary consent of that person and to renew consent if the study exceeds the 60-day term of consent validity; notwithstanding exceptions to any guarantees of confidentiality required by federal or state law. For example, a researcher may not guarantee confidentiality when the subject indicates an intent to commit further criminal conduct or harm himself/herself or someone else; and/or is deemed by a court to be essential to safeguard the physical health of others.
5. I agree to grant access to any mental health information I have obtained about a subject in the course of the research if the subject requests this.
6. I agree to follow the procedures established by the Privacy and Data Security Certification and to prevent unauthorized access to information identifiable to a private person.
7. I understand that my signing this agreement is a condition of my being able to conduct the research study.
8. I understand that it is my responsibility to ensure that the conduct of researchers (employees, students, and/or contractors) working on this project complies with the conditions outlined under this agreement.

By signing this statement, I acknowledge that I understand the rules and regulations surrounding the protection of confidential information and violation of these provisions is a criminal offense that can result in fines and/or imprisonment, in addition to any other penalty imposed by law. Violation of the provisions governing the confidentiality of mental health records constitutes a misdemeanor with penalties of a fine not more than \$1,000 or imprisonment for not more than 60 days, or both. Anyone who obtains mental health information under false pretenses or through deception is guilty of a misdemeanor and shall be fined not more than \$5,000 or imprisoned not more than 90 days, or both. Violation of provisions governing the confidentiality of drug and alcohol treatment records constitutes a criminal offense with penalties of a fine not more than \$500 for the first offense and not more than \$5,000 for each subsequent offense.

Signatures:


Principal Researcher _____ Date 2008 - Aug - 12

Co-Principal Researcher _____ Date _____

PRIVACY AND DATA SECURITY CERTIFICATION REQUIREMENTS

The Privacy and Data Security Certification must be prepared by the Principal Researcher(s) in accordance with the provisions outlined below, and approved by the Research Review Committee prior to the commencement of research activities.

In order to ensure confidentiality and data security, all research activities must 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 Researcher, you must provide written documentation of your adherence to privacy requirements and a data security plan. This must include the provisions listed below as well as any additional special conditions that pertain to the research to be undertaken. The Privacy and Data Security Certification must be signed by the Principal Researcher(s) and approved by the Research Review Committee prior to the commencement of research activities.

The Principal Researcher(s) must 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 may be terminated at any time. In addition, the researcher must 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. The researcher also

certifies 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. To comply with 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.

- (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 his/her responsibility to ensure that the conduct of staff, contractors, subcontractors, and consultants working on this project complies with the conditions outlined under this agreement.

INTELLECTUAL PROPERTY PROVISION

DAVID HUFFER

Name and Affiliation of Principal Researcher(s)

Risk - anticipated community supervision

Title of Research Project Covered Under This Agreement

As the Principal Researcher:

1. I hereby convey to the United States a royalty-free, non-exclusive, irrevocable license to reproduce, publish, translate, and use for any governmental purpose any copyrightable material developed as a result of research conducted under this Agreement.
2. I hereby convey to the United States a royalty-free, non-exclusive, irrevocable license to make and use for any governmental purpose any invention or trade secret developed as a result of research conducted under this Agreement.
3. I hereby agree to forever forebear from asserting against the United States any trademark or service mark rights in the name of any product or service developed as a result of research conducted under this Agreement.
4. I understand that it is my responsibility to ensure that the conduct of researchers (employees, students, and/or contractors) working on this project complies with the conditions outlined under this agreement.

Signature(s):

[Handwritten Signature]

Principal Researcher

2008. Aug. 12

Date

Co-Principal Researcher

Date

REPORTING PROGRESS AND PUBLISHING FINDINGS

David Huffer

Name and Affiliation of Principal Researcher(s)

Risk on the path | community supervision

Title of Research Project Covered Under This Agreement

As the Principal Researcher:

1. For a project lasting more than six (6) months, I will submit a progress report to the RRC at the end of six (6) months from the date of signature and then at least once per year after the submission of the first report.
2. For a project lasting less than six (6) months, I will submit a progress report to the RRC at a point midway between the initiation and termination of the research project.
3. At least 30 business days before any report of findings is to be released to the public, I will provide a copy (including an abstract) to the RRC.
4. In any publication of the research findings, I will acknowledge the Agency's participation in the research project.
5. In any publication of the research findings, I will expressly disclaim approval or endorsement of the published material as an expression of the policies of the Agency.

Signature(s):

[Handwritten Signature]

Principal Researcher

2008-Aug-12

Date

Co-Principal Researcher

Date