



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

**MEMORANDUM**

DATE: October 13, 2005  
TO: Paul A. Quander, Jr.  
CC: Susan W. Shaffer  
FROM: Claire M. Johnson   
RE: RRC Recommendations for Proposed Research

The Research Review Committee (RRC) has reviewed the proposal from The Urban Institute to conduct research for the District of Columbia's Project Safe Neighborhoods Initiative (PSN) using CSOSA offender data. The RRC recommends that CSOSA not support the project because it requires individually-identifiable data and cannot be conducted without the informed consent of the subjects. Support for this recommendation is provided in the Recommendation Statement which reflects the concurrence of all RRC members. The recommendation statement is attached.

The RRC recognizes that CSOSA is a PSN partner agency and that the proposed research could benefit the Agency. Therefore, we have included in the recommendation statement an alternative option for supporting the research that is in compliance with all of the regulatory requirements that must be met by CSOSA.

If you have any questions or would like a copy of the complete review file, please feel free to contact me at 202-220-5553 or [claire.johnson@csosa.gov](mailto:claire.johnson@csosa.gov).

Thank you.

Enclosure: Researcher request  
RRC recommendation statement

**Research Review Committee**

**Rebecca Childress**, Senior Program Analyst, Planning, Analysis and Evaluation, PSA • **Calvin C. Johnson**, Director of Research and Evaluation, CSOSA • **Claire M. Johnson**, Director of Justice and Community Relations, PSA • **Cliff T. Keenan**, Director of Operations, PSA • **Barbara Mathews-Beck**, Acting General Counsel • **Jerome Robinson**, Director, of Forensic Research, PSA • **Thomas H. Williams**, Associate Director of Community Supervision Services, CSOSA



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**RECOMMENDATION STATEMENT**

**DATE: October 13, 2005**

**I. RESEARCH PROPOSAL SUMMARY**

**Principal Researcher:** Caterina Gouvis Roman, Senior Research Associate, Justice Policy Center, The Urban Institute, 2100 M Street, NW Washington, DC 20037

**Title:** District of Columbia's Project Safe Neighborhoods Initiative

**Institution:** The Urban Institute

**Description:** This project will provide research and analytic support to DC's Project Safe Neighborhoods (PSN) program. PSN is employing a gun violence reduction initiative centered on group/gang-related violence. The major tenet of this strategy is to instill a message to group members that homicides and gun crimes will no longer be tolerated - that there are new rules concerning enforcement against violence. These new rules include enhanced intelligence on the activities of violent group members and collaboration among criminal justice officials to identify legal exposures that can facilitate and support the delivery of the new rules message (e.g., proactive law enforcement, harsher penalties, and increased level of parole/probation supervision). It is hypothesized that the message, when effectively delivered and supported, will act as peer pressure to refrain other groups from using guns and other forms of violence.

The research activities proposed via this data request will support the PSN initiative in two ways:

1. *Provide the mechanism for PSN to communicate the "new rules" message.* The PSN strategy relies on the partnership with CSOSA to provide the opportunity to convey the initiatives' message via *call-in* sessions. Persons identified as associates of violent groups who are active clients of CSOSA are used as conduits to communicate the program's message. Cross-referencing CSOSA data with personal identifiers of persons of interest provided by the Metropolitan Police Department (PDID, social security number) is essential for identifying the audience for the call-in sessions. Additionally, once an eligible audience is

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REVIEW RECOMMENDATION STATEMENT**

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identified, PSN relies on CSOSA to facilitate attendance to the call-in through notifications for court appearance as a condition of their release.

2. *Identify legal exposures.* The PSN initiative relies on the enforcement of existing legal exposures to back the new rules message. Examples of legal exposures include active warrants, open investigations, probation or parole supervision, possible or pending civil actions, etc. Cross-referencing CSOSA data with personal identifiers of persons of interest provided by the Metropolitan Police Department (PDID, social security number) will foster the identification of existing supervision exposures and possible levers that CSOSA could implement to strengthen the strategy's message. Examples of supervision levers include increased the level of supervision; electronic monitoring; or technical violations.

This study applies only to CSOSA.

**Type of Data and Analysis:** The Urban Institute will cross reference personal identifiers of all persons of interest (e.g., PDID, social security number) with CSOSA databases to identify current or last known address, case status (e.g., opened/closed), and type/level of supervision. Analyses of these data will primarily be descriptive (e.g., tables/reports). Additionally, spatial analysis of geocoded addresses (current or last known) of a sub-sample of PSN persons of interest support the creation of geographic maps of persons of interest under CSOSA supervision within group territories.

**Subjects:** The sample includes all persons identified by Project Safe Neighborhoods known to be associated with a group or gang within the District of Columbia. Currently, PSN has identified over 3000 individuals that meet this criterion. It is expected that this number will increase throughout the project's development. We anticipate it will be necessary to conduct cross-referencing tasks for the entire sample at least on a quarterly basis (every three months). It may be necessary to perform additional queries for a sub-set of the sample to inform call-in planning.

## **II. RECOMMENDATION**

The RRC recommendation for this study:

Support                       Support with Conditions                       **Do Not Support**

The RRC recommends that the Agency not support this request as proposed for the following reasons:

- The request is for individually-identifiable data; and
- Research cannot be conducted without the informed consent of the subjects.

### III. SUPPORTING INFORMATION

#### Regulatory:

The pertinent citations regarding the requirement for informed consent that support the RRC recommendation include:

- 45 CFR 46.116 and 45 CFR 46.101 from the Department of Health and Human Services (HHS); and
- 28 CFR 46.116 and 28 CFR 46.101 from the Department of Justice.

#### Alternative Considerations:

The RRC recognizes the following benefits of the proposed research to the Agency:

- The researchers are responsible for tracking outcomes and will produce a brief report summarizing the research activities of the project and the outcomes tracked, and responding to the needs of the PSN Executive Team, which includes USAO, Chief of Police, and CSOSA Director.
- The researcher will make available to the Agency maps, tables and graphs that describe analysis reporting CSOSA status of persons of interest by group affiliations and gang/group territories.
- Information provided by the researcher will alleviate the burden on CSOSA staff continually to update the database.

In order to yield these benefits to the Agency, the RRC offers the following considerations as an alternative to supporting the proposed research.

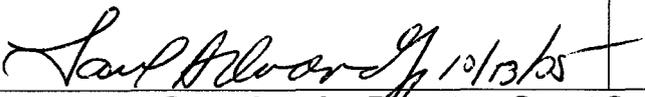
45 CFR 46.101 does not exempt the proposed research project from the policy which includes the provision for informed consent in 45 CFR 46.116. While 45 CFR 46.101(i) does allow for the head of an agency to waive provisions of the policy upon advance notice of such action to the Office for Protection from Research Risks at HHS and publication of the advance notice in the Federal Register, it does so unless otherwise required by law. The Privacy Act then becomes the pertinent law. Under the Privacy Act, CSOSA can release the information to another law enforcement agency without consent (see routine use E of CSOSA's system of record for SMART (CSOSA-11) -- "E. A record may be disseminated to a Federal, state, local, foreign, or international law enforcement agency to assist in the general crime prevention and detection efforts of the recipient agency or to provide investigative leads to such agency"). There are no other pertinent exceptions to releasing the information without consent. CSOSA

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therefore can release the information to the USAO, which is the local project sponsor that is contracting with the Urban Institute, but not directly to the Urban Institute.

With this option, an agreement for data-sharing would have to be established between CSOSA and the USAO.

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

■ **THE URBAN INSTITUTE** 2100 M STREET, N.W. / WASHINGTON D.C. 20037

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**Caterina Gouvis Roman**  
Senior Research Associate

phone: 202-261-5704  
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**TO:** Claire M. Johnson  
**FROM:** Caterina Roman *CR*  
**DATE:** May 23, 2005  
**SUBJ:** RRB Submission

Enclosed please find six (6) copies of materials requesting a review by CSOSA's Research Review Board (RRB). The documents enclosed are as follows:

(1) summary statement of the research, (2) detailed statement of research, (3) IRB approval, (4) application package submitted to the Urban Institute's IRB and follow-up addendum, (5) resume of PI, (6) memo indicating agreement to provide data set and deliverables to CSOSA at close of project.

Thank you very much for considering this request. We look forward to your response.

**Caterina Gouvis Roman**  
Senior Research Associate



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**TO:** Research Review Board  
Court Services and Offender Supervision Agency

**DATE:** May 23, 2005

**SUBJ:** **Summary Statement** for Study: District of Columbia's Project Safe Neighborhoods Initiative

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- A. Name and Affiliation: Caterina Gouvis Roman, Senior Research Associate, Justice Policy Center, The Urban Institute, 2100 M Street, NW Washington, DC 20037
- B. Title of Study: District of Columbia's Project Safe Neighborhoods Initiative
- C. Purpose of Project: The purpose of the project is to provide research and analytic support the District of Columbia's Project Safe Neighborhoods (PSN) program. PSN is employing a gun violence reduction initiative centered on group/gang-related violence. The major tenet of this strategy is to instill a message to group members that homicides and gun crimes will no longer be tolerated – that there are new rules concerning enforcement against violence. These new rules include enhanced intelligence on the activities of violent group members and collaboration among criminal justice officials to identify legal exposures that can facilitate and support the delivery of the new rules message (e.g. proactive law enforcement, harsher penalties, increased level of parole/probation supervision). It is hypothesized that the message, when effectively delivered and supported, will act as peer pressure to refrain other groups from using guns and other forms of violence.

The research activities proposed via this data request will support the PSN initiative in two ways:

1. *Provide the mechanism for PSN to communicate the "new rules" message.* The PSN strategy relies on the partnership with CSOSA to provide the opportunity to convey the initiatives' message via *call-in* sessions. Persons identified as associates of violent groups who are active clients of CSOSA are used as conduits to communicate the program's message. Cross-referencing CSOSA data with personal identifiers of persons of interest provided by the Metropolitan Police Department (PDID, social security number) is essential for identifying the audience for the call-in sessions. Additionally, once an eligible audience is identified, PSN relies on CSOSA to facilitate attendance to the call-in through notifications for court appearance as a condition of their release.

2. ***Identify legal exposures.*** The PSN initiative relies on the enforcement of existing legal exposures to back the new rules message. Examples of legal exposures include active warrants, open investigations, probation or parole supervision, possible or pending civil actions, etc. Cross-referencing CSOSA data with personal identifiers of persons of interest provided by the Metropolitan Police Department (PDID, social security number) will foster the identification of existing supervision exposures and possible levers that CSOSA could implement to strengthen the strategy's message. Examples of supervision levers include increased the level of supervision; electronic monitoring; or technical violations.

D. **Location of Project:** District of Columbia

E. **Duration of Study:** Currently ongoing through December 2006

F. **Research Methods Employed:** The Urban Institute will cross reference personal identifiers of all persons of interest (e.g. PDID, social security number) with CSOSA databases to identify current or last known address, case status (e.g. opened/closed), and type/level of supervision. Analyses of these data will primarily be descriptive (e.g. tables/reports). Additionally, spatial analysis of geocoded addresses (current or last known) of a sub-sample of PSN persons of interest support the creation of geographic maps of persons of interest under CSOSA supervision within group territories.

G. **Sample type and size required/time frame for sample collection:** The sample includes all persons identified by Project Safe Neighborhoods known to be associated with a group or gang within the District of Columbia. Currently, PSN has identified over 3000 individuals that meet this criterion. It is expected that this number will increase throughout the project's development. We anticipate it will be necessary to conduct cross-referencing tasks for the entire sample at least on a quarterly basis (every three months). It may be necessary to perform additional queries for a sub-set of the sample to inform call-in planning.

H. **Agency staff and/or resources needed to support the study:** CSOSA individual that has knowledge of this file and provide background information on the geocoding and validation of existing data file.

I. **Indication of risk or discomfort to subjects as a result of participation:** All data collected by the research team will be maintained under the confidentiality provisions of our data security plan. Overall, the risks to human subjects are minimal or non-existent.

J. **Anticipated Results:** Maps, tables and graphs that describe analysis reporting CSOSA status of persons of interest by group affiliations and gang/group territories.

K. **List of Deliverables:** Deliverables for PSN are ongoing and change with the needs of the PSN Executive Team (USAO, Chief of Police, CSOSA Director, etc). We are also responsible for tracking outcomes and will produce a brief report summarizing the research activities of the project and the outcomes tracked.

**Caterina Gouvis Roman**  
Senior Research Associate



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**TO:** Research Review Board  
Court Services and Offender Supervision Agency

**DATE:** May 23, 2005

**SUBJ:** Detailed Statement for Study: District of Columbia's Project Safe Neighborhoods Initiative

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A. Review of Related Literature

The proposed project is not an outcome-based study. However, the proposed analysis activities outlined in this request will support the programmatic implementation and process evaluation of the Project Safe Neighborhoods initiative. PSN is employing a gun violence reduction initiative centered on group/gang-related violence known as "pulling levers." This strategy has been demonstrated to be effective in reducing group motivated homicides and gun violence in Boston's Ceasefire initiative. Other PSN sites, including Rochester, NY, Indianapolis, IN and Winston-Salem, NC, have adopted a similar violence reduction strategy as part of their initiative. Although there is some inherent variation between cities, the PSN strategy being implemented in the District emulates the components of the Ceasefire program model in all areas except community outreach.

B. Detailed Description of Research Method

*Data*

The sample includes all persons identified by Project Safe Neighborhoods known to be associated with a group or gang within the District of Columbia (these individuals are known as "persons of interest" or POIs). Currently, PSN has identified over 3000 individuals that meet the specified criteria. It is expected that this number will increase throughout the project's development. We anticipate it will be necessary to conduct cross-referencing tasks for the entire sample at least on a quarterly basis (every three months). It may be necessary to perform additional queries for a sub-set of the sample to inform call-in planning.

The data elements of interest include:

- CSOSA unique identification number for parolees and probationers that are on the PSN POI list developed by the Urban Institute
- Current or last known address

- Current case status (e.g. opened/closed)
- Type and level of supervision
- Start and end date(s) of supervision case(s)
- CSO/SCSO assignment
- CSO team assignment
- CSO PSA assignment

### *Research Activities*

To support the research activities described above the Urban Institute will:

1. Cross-reference personal identifiers of persons of interest provided by the Metropolitan Police Department (e.g. PDID, social security number) with CSOSA databases. This activity will identify the audience for the call-in sessions.
2. Geocode addresses of persons of interest to document a descriptive relationship between PSN call-in participants and group-related violence within group territories.

### C. Significance of Anticipated Results

The proposed project is not an outcome-based study. However, the descriptive maps, tables and graphs generated from analysis provide valuable support towards the success of the PSN initiative. (See Item D. Benefits of Research)

### D. Benefits of Research

The research activities supported by the data provided by this request will support the PSN initiative in two ways:

1. *Provide the mechanism for PSN to communicate the “new rules” message.* The PSN strategy relies on the partnership with CSOSA to provide the opportunity to convey the initiative’s message via *call-in* sessions. Persons identified as associates of violent groups (POIs) who are active clients of CSOSA are used as conduits to communicate the program’s message. Cross-referencing CSOSA data with personal identifiers of persons of interest provided by the Metropolitan Police Department (PDID, social security number) is essential for identifying the audience for the call-in sessions. Additionally, once an eligible audience is identified, PSN relies on CSOSA to facilitate attendance to the call-in through notifications for court appearance as a condition of their release.
2. *Identify legal exposures.* The PSN initiative relies on the enforcement of existing legal exposures to back the new rules message. Examples of legal exposures include active warrants, open investigations, probation or parole supervision,

possible or pending civil actions, etc. Cross-referencing CSOSA data with personal identifiers of persons of interest provided by the Metropolitan Police Department (PDID, social security number) will foster the identification of existing supervision exposures and possible levers that CSOSA could implement to strengthen the strategy's message. Examples of supervision levers include increased the level of supervision; electronic monitoring; or technical violations.

E. Specific Resources Required from the Agency

A CSOSA representative that has knowledge of applicable data files that can provide background information on the geocoding and validation of existing data files.

F. Description of Possible Risks

All data collected by the research team will be maintained under the confidentiality provisions of our IRB protocol and data security plan (See Appendix A). Overall, the risks to human subjects are minimal or non-existent.

G. Description of Steps Taken to Minimize Potential Risk

UI researchers must adhere to an approved Human Subjects Protocol as described in Appendix A.

H. Description of Physical and/or Administrative Procedures

1. The Urban Institute ensures the security of any individually identifiable data that are being collected for the project and will maintain strict standards of security and confidentiality pursuant to 5 U.S.C. § 552a (The Privacy Act of 1974) and 42 U.S.C. 46 § 3789g, for all data and records provided by MPD. The Urban Institute has developed a detailed data security plan for their involvement in Project Safe Neighborhoods. This plan has been approved by the Urban Institute's Human Subjects Research Review Committee (See Appendix A).
2. The Urban Institute will destroy all research records or remove individual identifiers from those records when the research has been completed. In addition, any identifiers that could be linked to a specific individual will be encrypted. Linkable information and personal identification fields include names (of the complainant/victim, suspect or member), aliases, social security numbers, PDID, CCN and addresses. (See Appendix A.)

I. Anticipated effects of the research project on Agency programs and operations

Information provided to UI will alleviate burden on CSOSA staff to continually update database.

**J. Supporting Documentation**

not applicable

**K. Deliverables**

**Deliverables will include a brief report summarizing the research activities of the project and any evaluation findings.**

**L. Datasets**

**The Urban Institute will provide copies of datasets to CSOSA/PSA at the conclusion of the project.**