



State of California
Department of Corrections and Rehabilitation
Research Oversight Committee

Guidelines for Submitting Research Applications

Introduction

The California Department of Corrections and Rehabilitation (CDCR) supports high quality research as the foundation for evidence-based approaches and practices that will guide the delivery of rehabilitative services, and improve outcomes for incarcerated offenders and parolees in the community.

CDCR assesses, approves, coordinates and monitors its research activities to ensure:

- alignment with CDCR's organizational objectives stated in the [January 2016 Blueprint](#);
- use of suitable research methodologies;
- appropriate and lawful access to CDCR resources;
- adherence to the policies of the [Committee for the Protection of Human Subjects](#).

These research guidelines provide:

- key points to consider when conducting research with CDCR;
- information on how to obtain approval to use CDCR resources for research, and;
- directions to follow when applying for and conducting research with CDCR.

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Research Proposal and Research Application Process

Research Proposal Form

Researchers must submit a completed Research Proposal Form to Data.Requests@cdcr.ca.gov. CDCR accepts Research Proposals during specified time windows each year and submission dates are specified on [CDCR's external research website](#).

Applicants must address the following criteria in the Research Proposal Form:

- alignment with CDCR's research priorities;
- high-level summary of needed CDCR resources – access to offenders, facilities, staff, data, etc.;
- research benefits to CDCR, CDCR's in-custody and/or parolee populations, and the community;
- brief summary of the research including background, scope, proposed methodology or methodologies, and sampling construct(s) and data analyses;
- basis of research (academic and/or professional), and intent to publish, if any;
- submit any prior approvals by CDCR, other state agencies, or committees;
- proposed start and end dates for the project.

An initial assessment of the research proposal will be conducted by CDCR's Research Oversight Committee (ROC) administrative team. If the proposal appears to be sound and the intent of the research shows merit, a Letter of Conceptual Support (LCS) will be provided inviting the applicant to submit a Research Application. **The receipt of a LCS does not guarantee approval or endorsement of the research project, but may provide the researcher with preliminary documentation for Institutional Review Board (IRB) approval processes and Information Practices Act (IPA) approval through State of California-funded [Committee for the Protection of Human Subjects \(CPHS\)](#).** In addition, the LCS will include additional direction on how to obtain supporting documentation to be submitted with the Research Application Form.

Applicants who were invited to move forward with the process must submit a full application and all supporting documentation by the ROC application submission dates (see [CDCR's external research website](#)).

Applicants will be notified of the outcome of the ROC's decision within 90 calendar days of the ROC application submission date. ROC decisions are final.

Research Application Process

Applicants who were invited to move forward with the process must submit a full application and all supporting documentation by the ROC application submission dates (see [CDCR's external research website](#)).

Supporting documentation includes:

- ATTACHMENT A – Research Staff/Affiliate(s) Contact Information, Curriculum Vitae/Resume, and Criminal History Verification for each staff member;
- ATTACHMENT B – Request for Access to Offender Data for Research Purpose;
- ATTACHMENT C – CDCR Data Sharing Agreement;
- Research Instruments and Data Collection Tools;
- Letter of Support from Principal Academic Advisor (Student Requests Only);
- Letter for Support from Fiduciary Entity (Non-Student Requests Only);
- Letter of Support from CDCR Division Leadership in whose area of responsibility the research will be conducted;
- Institutional Review Board Approvals;
- Committee for the Protection of Human Subjects Approval for Information Practices Act;

Applicants must email their application, together with all supporting documentation to Data.Requests@cdcr.ca.gov by the application deadline. Within 90 calendar days of the application deadline, all applicants will be informed in writing of the outcome of their application.

Research Application From

Applicants must address the following areas in the Research Application Form:

- Applicant background information;
- Information on all affiliated individuals or entities involved with the proposal;
- Academic or professional affiliations;
- Current resumes from all professional staff members involved;
- Principal Academic Advisor (required if applicant is a student);
- Project scope and time frame;
- Data elements needed;
- Resources and access needed;
- Research methodology or methodologies;
- Risks and benefits of the project;
- Potential conflict of interests.

Applicants must disclose, as part of the Research Application Form, any information that may be important to CDCR in determining whether an actual, potential or perceived conflict of interest exists. Potential conflicts may include but is not limited to:

- being an employee of CDCR;
- being employed by or affiliated with current or potential service providers to CDCR;
- past or current friendships, interactions or relationships with offenders, ex-offenders, or individuals/groups who may reasonably be perceived as being involved in, or potentially involved in, criminal activities.

Any potential conflict of interest will be considered by CDCR and additional conditions of approval may be imposed to manage these interests should the project be approved. Timely identification and management of the potential conflict is essential.

If a conflict of interest is not listed and later discovered, approved proposals will be subject to complete termination as detailed in the Termination of Approved Research Projects section of the Research Guidelines document.

[CDCR Data Sharing Agreement](#)

The CDCR DSA is entered into by and between CDCR and the applicant to establish the content, appropriate disclosure, use, and protection of the data requested by the applicant to support a contracted service, research study, and/or an operational business need of CDCR or other governmental agency, whether or not such data is provided by CDCR or collected or created by the applicant on behalf of CDCR.

A CDCR DSA will be provided if the applicant is invited to submit a full research application. The CDCR DSA must be completed and submitted along with the Research Application Form. Key points of the CDCR DSA are:

- **Criminal Background Check.** Before a workforce member may access any source data, including, but not limited to CDCR protected health information (PHI), personal information (PI), and other confidential data, the workforce member shall undergo, cost shall be borne by researcher, a state and federal fingerprint-based background check conducted by the Department of Justice (DOJ). A criminal history that warrants substantial concerns on the part of CDCR, as a result of either the initial DOJ background check or any subsequent criminal record review, shall exclude the workforce member from access to any source data, including, but not limited to CDCR PHI, PI, and other confidential data:
 - Access to criminal history summary records maintained by the DOJ is restricted by law to legitimate law enforcement purposes and authorized applicant agencies. However, individuals have the right to request a copy of their own criminal history record from CDCR to review for accuracy and completeness.

- To receive a copy of your criminal history record, individuals must submit fingerprint images, pay a \$25 processing fee to the DOJ, and follow the instructions located on the [California DOJ website](#).
- Fingerprinting services are available at most local police departments, sheriff's offices or any public applicant Live Scan site. To find the sites nearest to you, their fingerprint rolling fees, and acceptable methods of payment, see the [Public Live Scan Sites website](#).
- Applicants who reside outside California must complete the Application to obtain a copy of State Summary Criminal History Record and follow the instructions also located on the [California DOJ website](#). Please contact your local law enforcement agency for fingerprinting services.
- All research applicants and project members are required to submit a copy of legal documentation verifying their Criminal History Record.
- **Requested Data Elements.** Applicants shall provide a detailed explanation of each data element requested from CDCR.
- **Notification of Breach.** Applicants agree to implement reasonable systems for the discovery and prompt reporting of any breach or security incident.

In accordance with the CDCR DSA, applicants requesting access to medical information belonging to CDCR's offenders must obtain the informed consent of the individual. Some or all of the data specified in the DSA may constitute PHI, including PHI in electronic media (ePHI), under federal law, and personally identifiable information (PII) under state law.

The limitations on intended use of data, the constraints on use of the data, requirements for data security, requirements for data elements, data handling requirements, network security, notification of security breaches, indemnification, requirements to destroy all data upon the termination or natural expiration of the DSA, and the security requirements contained in the associated attachments shall survive this agreement into perpetuity.

Institutional Review Board

An Institutional Review Board (IRB) is an administrative body established to protect the rights and welfare of human research subjects recruited to participate in research activities conducted under the auspices of the institution with which it is affiliated.

An IRB is charged with the responsibility of reviewing, prior to its initiation, all research involving human participants. An IRB has the authority to approve, disapprove, monitor and require modifications to all research activities that fall within its jurisdiction, specified by both federal regulations and institutional policy.

It should be noted that each IRB is an independent federal authority. No reciprocity exists between IRBs. An IRB approval does not constitute automatic approval of the research application by CDCR.

For any research involving youthful offenders or children (as defined by Code of Federal Relations 46.409), the IRB shall require appointment of an advocate for each child who is a ward, in addition to any other individual acting on behalf of the child as guardian or in loco parentis. One individual may serve as advocate for more than one child. The advocate shall be an individual who has the background and experience to act in, and agrees to act in, the best interests of the child for the duration of the child's participation in the research and who is not associated in any way (except in the role as advocate or member of the IRB) with the research, the investigator(s), or the guardian organization.

[Committee for the Protection of Human Subjects](#)

CDCR is guided by the [Committee for the Protection of Human Subjects](#) (CPHS) funded through the California Office of Statewide Health Planning and Development (OSHPD). CDCR research requests require a CPHS [Information Practices Act](#) approval to provide limits on the collection, management and dissemination of personal information by state agencies.

Applicants must note an IRB approval does not constitute automatic approval of the research application by CDCR.

[Letter of Support from Principal Academic Advisor \(Student Requests Only\)](#)

Applicants conducting research for a class project, a thesis/dissertation, or for peer-reviewed publication, etc., must obtain a letter of support from one or more sponsoring academic advisors. Support letters must identify the relationship with the student and approve the research scope, methodology (including statistics methodology), potential benefits and shortcomings of the research.

[Letter of Support from Fiduciary Entity \(Non-Student Requests Only\)](#)

Applicants conducting academic or professional research as a non-student, must specifically identify and acknowledge their fiduciary entity. The fiduciary entity is ultimately responsible for the risks associated with the research.

[CDCR Letter of Support from CDCR Division Leadership](#)

Applicants will receive contact information and direction to initiate communication between the CDCR Division that will be impacted by the proposed research project. The intent of this communication is to help the applicant better understand the CDCR program, including its data practices, and to clarify any potential concerns and/or limitations that the applicant may need to address. After the research application has been updated, if necessary, to address any concerns and limitations, the Division Director/Chief should provide a letter of support/acknowledgement explaining the Division's understanding of the proposal and identifying the potential benefits and/or risks to CDCR.

Request for Access to Offender Data for Research Purposes

Applicants requesting access to CDCR's offender population(s) or staff members must complete a Request for Access to Offender Data for Research Purpose form. This document indicates that applicants will adhere to the [California regulations](#) when obtaining and protecting offender data.

Recruiting Participants and Participant Consent Form

Informed consent must be obtained from all participants and documented, except in cases where the approved research project includes large non-identifiable data sets. Applicants requiring access to CDCR records relating to specific individuals (e.g. individual patient records or staff records) must obtain the explicit consent of those individuals.

Applicants must ensure that informed consent of participants is obtained in accordance with California Penal Code Section 3521, the [Code of Regulations](#) (Title 15, Article 9.1) and the California Civil Code Sections 1798.24-1798.24b. Obtaining informed consent may require researchers to enlist the assistance of interpreters, guardians and advocates.

Participant consent can be obtained in the following ways:

- written informed consent from an offender 18 years or older;
- if the participant is a youthful offender, the consent of the participant's parent or guardian is required.

Applicants must ensure that participants are given a Participant Information Sheet and Participant Consent Form that explains what information is required from them, what consequences will arise out of their cooperation and their rights in relation to the research project. Participation in research is voluntary and participants including youthful offenders are entitled to withdraw from research at any time.

CDCR does not permit the offering of incentives or rewards to any individuals as inducement to participate in a research study. It would be acceptable for applicants to reimburse parolees for the associated costs incurred during participation in the research study (e.g. travel costs).

Recording/Transcribing Interviews

Applicants who wish to transcribe or record interviews must request permission to allow electronic devices to be brought into CDCR premises and the recording or transcribing of interviews must be obtained from the Warden, and/or Division of Adult Institution Director/Chief, and/or Division of Juvenile Justice Director/Chief. The ROC administrative support team will help applicants coordinate their request and connect them with appropriate CDCR Divisions.

Applicants must ensure that they have an alternative plan for documenting interviews and information if their request to record or transcribe interviews is not approved.

Interviews may only be recorded or transcribed provided that the informed consent of the participant has been obtained.

[Access to Department Premises](#)

Applicants visiting institutions must adhere to all Departmental rules, regulations, protocols, procedures and directions indicated on CDCR's [Visitation Information website](#).

The intent of the website is to help develop and maintain healthy family and community relationships. The page assists the general public in locating, contacting, visiting, and corresponding with inmates and juveniles who are in our institutions.

[Research Instruments and Data Collection Tools](#)

As part of the research methodology, applicants must attach copies of any research instruments and data collection tools such as surveys and questionnaires to the Research Application Form.

[Review of Completed Research Applications](#)

Complete Research Applications submitted prior the designated application deadlines will be received and reviewed by the ROC administrative support team. Applications will not commence in the review process until all documentation has been received and clarifications have been made.

Within 90 calendar days of submission due date, all applicants will be informed in writing of the outcome of their application.

[Research Oversight Committee Process](#)

The ROC process provides a standardized and comprehensive approach for selecting and overseeing CDCR research projects. The ROC process emphasizes a diverse and open approach in determining which projects will be approved by CDCR. The ROC will ensure proper protections for our adult, youth, and parolee populations.

The ROC membership is comprised of CDCR Directors, General Counsel and Labor Relations Chief. The Division of Correctional Policy Research and Internal Oversight (CPRIO) Director serves as the presiding officer of the ROC. The ROC administrative staff support comes from CPRO.

The ROC may meets twice a year to consider research projects. Research Applications will be reviewed administratively for completeness and applicability and only those meeting the requirements indicated in these guidelines will be forwarded for ROC review.

Approved Research Applications

Once research applications have received the ROC approval, the ROC administrative team will obtain signatures from authorized CDCR officials. The ROC and CDCR DSA approvals will last for a maximum period of two years. Additional time needed for research requires a new Research Proposal and Research Application to be submitted for review and approval.

Non-Approved Applications

Once the ROC members have made their decision, the ROC administrative team will communicate the outcome to applicants and indicate areas of concern for research projects that are not approved. Decisions by the ROC are final; however, applicants are encouraged to submit new research proposals in the future.

Reporting Expectations

The CDCR reserves the right to require the inclusion of a research limitation section in any research report that contains information or data obtained from CDCR for research purposes and published to a public audience.

Progress Reports/Completion Reports

For all approved research projects, applicants must provide a progress report to the ROC administrative team as specified in the CDCR DSA. A final completion report is also required at the conclusion of the research.

Since the ROC approval lasts for two years, applicants must submit an updated IRB and CPHS approval for the second year of the research agreement to ensure that the approved application remains in compliance. Exempt CPHS approvals do not have to re-submit. Non-exempt CPHS approvals will need to be re-submitted annually with revised dates.

Applicants may submit a progress or completion report via email to Data.Requests@cdcr.ca.gov. Failure to provide progress reports and IRB/CPHS renewal approvals may result in CDCR terminating the approved research project.

Publication of Research Findings

Applicants must notify CDCR of the publication details of the research findings when known. Researchers should note that the final copy of the research findings submitted to CDCR may be made available on CDCR's website. The CDCR reserves the right to require the inclusion of a research limitation section in the publication of approved project's final report.

Email research findings of Approved Research Projects to Data.Requests@cdcr.ca.gov prior to publication. Submission of research reports, thesis, dissertations, manuscripts, conference presentations, journal publications, press releases, internet postings, discussion papers, posters, chapters in edited books are considered publication.

A ROC approval is granted to an applicant for a specific research project. Subsequent use of the data obtained for or generated by this research project is not permitted. A separate ROC approval is required if the data obtained for or generated by this research project is planned for use in a subsequent research project, thereby necessitating another CDCR DSA.

Approval to publish research findings will be granted only if the following publication conditions are met as per the Title 15 Article 9.1 Section 3369.5:

- the research findings are based on research that is factually correct;
- the research findings do not identify any individuals;
- the research findings do not reveal confidential CDCR information;
- the research findings do not pose a security risk, including risk to the operations of CDCR or the safety of the community.

In accordance with Assembly Bill (AB) 2192, Section 3 13989.6 (a)(1), any researcher who has received research funding from CDCR or any California state agency, in whole or in part, shall provide for free public access to any publication of a peer-reviewed manuscript describing state agency-funded knowledge, a state agency-funded invention, or state agency-funded technology. Failure to comply with the provisions delineated in AB 2192 may result in termination of any existing CDCR DSA executed between the research entity and the Agency, as well as forfeiture of the party to establish any future agreements.

Additionally, Applicants must:

- acknowledge, in a form approved by CDCR, the participation and/or assistance of CDCR and relevant service providers in the conduct of the research;
- publicly state that any material published or made publicly available by a researcher cannot be considered as either endorsed by CDCR or an expression of the policies or view of CDCR;
- publicly state that any errors of omission or commission are the responsibility of the researchers.

Recordkeeping, Communication and Official Information

To ensure compliance with the State Records Management Act 2000 (Government Code sections 12270-12279), Applicants (including Departmental staff) must comply with CDCR's Recordkeeping Policy and Confidentiality and Information Privacy Policy which are incorporated in CDCR's [Code of Regulations](#)

When interviews with research participants are to be audio recorded or transcribed, research personnel must:

- obtain approval to record or transcribe participant interviews from the prison warden, Manager or Director of a facility;
- obtain participant's informed consent;
- protect the privacy and confidentiality of participants;
- ensure that audio files and transcripts are kept confidential, only used for authorized purposes and maintained in accordance with CDCR's Recordkeeping Policy and Confidentiality and Information Privacy Policy.

Amendments to Approved Research Projects

Any substantive amendments to an approved research project are subject to new submission of the amended project and the full ROC approval process.

Termination of Approved Research Projects

Approved research projects are subject to complete termination if the methodology or project scope is changed at any time during the course of the approved project.

CDCR reserves the right to suspend or terminate an approved research project when:

- continuation of the approved research project may prove detrimental to participant(s) or the safe and orderly operation of Departmental premises;
- CDCR determines, at its sole discretion, that a researcher is not abiding by the Research Guidelines, Department's Code of Conduct, rules, regulations, protocols, procedures or directions, or;
- a researcher is arrested a criminal offense or engaged in misconduct contrary to CDCR's Code of Conduct.

In the event that CDCR terminates an approved research project, approval to access CDCR's premises is withdrawn and researchers must leave CDCR's premises immediately.

Definitions

Approved Research Projects

Research applications approved by the ROC with a signed application and CDCR DSA.

Conflict of interest

Where a person's individual interests or responsibilities have the potential to influence the carrying out of his or her institutional role or professional obligations in research or where an institution's interest or responsibilities have the potential to influence the carrying out of its research obligations.

Data

Data as defined as information, the disclosure of which is restricted or prohibited by any provision of law. Some examples of confidential information include, but are not limited to, personal information about individuals as defined in California Civil Code Section 1798.3 of the Information Practices Act (IPA) if the disclosure of the personal information is not otherwise allowed by the IPA.

Data includes but is not limited to:

- What people say in interviews, focus groups, questionnaires, personal histories and biographies;
- Analysis of existing information (clinical, social, observational or other).

Participant

Participant means anyone who is the subject of research. Participating in research includes:

- taking part in surveys or interviews;
- undergoing psychological, physiological or medical testing or treatment;
- being observed by researchers;
- personal documents or other materials being accessed by researchers;
- information that is part of an existing database being accessed by researchers.

Publication

Publication means public dissemination, presentation, performance or exhibition. An output of research and includes research reports, journal articles, theses, dissertations, manuscripts, conference presentations, posters, discussion papers, press releases, internet postings and chapters in edited books.

Research

According to the U.S. Department of Education, the following provision regarding the protection of human subjects [\[34 CFR 97.102\(d\)\]](#) defines research as: "... a systematic investigation, including research, development, testing and evaluation, designed to contribute to generalizable knowledge." The [California State Penal Code § 3500](#) expands this definition to include data upon which such knowledge may be based, and requires that such knowledge can be corroborated by accepted scientific observation and inferences.

This definition encompasses research and evaluation conducted by CDCR employees, contractors, faculty at institutions of higher education, researchers with private research firms, governmental agencies, and students. Projects that involve personal interaction with wards or adult offenders committed to and paroled by the CDCR, program evaluation, clinical trials of interventions, and any requests by outside researchers for access to wards, adult offenders, staff, or data are subject to this review and approval process.

Research Application

Research Application is a form to be completed by researchers if they have received an invitation from CDCR to submit a full application. This form requires a comprehensive explanation of the proposed research proposal to be undertaken by researchers.

Research Proposal

Research Proposal is a form to be completed by researchers as the first step of applying to conduct research with CDCR. This form requires researchers to provide a brief summary about the proposed research study.

Youthful offender

Youthful offender is defined as any prisoner who was under 23 years of age at the time of his or her controlling offense per Penal Code section 3051(a). The following cases and individuals are disqualified from youthful offender eligibility (Penal Code section 3051(h)):

- Cases in which sentencing on the controlling offense occurs pursuant to Penal Code sections 1170.12, 667(b)-(i), or 667.61.
- Cases in which the individual was sentenced to life in prison without the possibility of parole.
- Individuals who, after reaching age 23, commit an additional crime for which malice aforethought is a necessary element of the crime.
- Individuals who, after reaching 23, commit an additional crime for which he or she is sentenced to a new term of life in prison

Frequently Asked Questions

How do researchers apply for approval to conduct research with CDCR?

There are 2 steps in the application process.

- Step 1: Submit a Research Proposal Form.
- Step 2: Upon receipt of Letter of Conceptual Support (LCS), submit a Research Application Form and supporting documentation.

The LCS will include additional direction on how to obtain supporting documentation to be submitted with the Research Application Form.

When do researchers submit a Research Proposal and Research Application?

CDCR accepts Research Proposals twice a year. CDCR will only accept and assess Research Proposal Forms and Research Applications Forms during set time frames which are published on the Department's website.

How does CDCR assess research applications?

CDCR will assess applications based on:

- alignment to CDCR's Research Priorities;
- benefits of the research to CDCR and the corrections research community;
- impact on CDCR's clients, staff, and resources;
- CDCR's capacity to support and facilitate the proposed research, and;
- advice from relevant subject matter experts.

Will applicants receive a response regarding the outcome of their research application?

Yes, within 90 calendar days of the ROC application submission date, CDCR will contact applicants in relation to the outcome of their Research Proposal and Application.

Once a research application has been approved, who should researchers contact to commence research/ discuss project issues?

Researchers should contact the ROC Administration Team. Details of the ROC Administration Team will be provided in the Approval Letter, should the application be approved by CDCR.

What obligations are placed on researchers when conducting research with CDCR?

Researchers must observe and comply with all Departmental rules, regulations, protocols, procedures and directions. Progress reports must be provided to the ROC Administration Team every 3 to 6 months or as advised by the ROC Administration Team.

Frequently Asked Questions (cont.)

How do researchers obtain approval to publish research findings?

Researchers must obtain approval from CDCR before any research findings are published or are otherwise made available to the public. This approval may be stipulated to in the researcher's approved CDCR research application; otherwise, a new CDCR research application is required. Making any research findings available to the public must meet the publication conditions set out in the Prison Regulations 1982, Sentence Administration Regulations 2003, and Young Offenders Regulations 1995 in order to be approved for publication.

Checklist for Applicants

Research Proposal

- Read Research Guidelines and Research Proposal Form
- Identify submission date for Research Proposal
- Collect any prior approvals by CDCR, other state agencies, or committees
- Submit Research Proposal Form by due date

Research Application

- Receive Letter of Conceptual Support (invitation) to submit Research Application Form and supporting documentation
- Receive direction to contact CDCR Division representatives

Ensure Research Application Form packet is completed and includes the following:

- Attachment A – Research Staff/Affiliate(s) Contact Information, Resume(s), and Criminal Background Check(s) from each professional staff member
- Attachment B – Request to Access Offender Data for Research Purpose
- Attachment C – CDCR Data Sharing Agreement
- Copies of research instruments and data collection tools
- Letter of Support from Principal Academic Advisor (Student Requests Only)
- Letter of Support from Fiduciary Entity (Non-Student Requests Only)
- Letter of Support from CDCR Division Leadership
- Institutional Review Board Approval
- Committee for the Protection of Human Subjects Information Practices Act Approval
- Submit Research Application Form and supporting documentation by date indicated in Letter of Conceptual Support

Post-Approval

- Receive approval letter to conduct with instructions for next steps
- Copy of CDCR Data Sharing Agreement received
- Direct contact for ROC Administrative Team is identified

Conducting Research

- Obtain informed consent of research participants
- Obtain informed consent of parent and/or legal guardian
- Contact ROC Administrative Team to arrange logistics

Reporting/Publication

- Submit progress report(s) to ROC Administrative Team.

Ensure research output complies with publication conditions:

- Reporting is factually correct
- Does not identify individuals
- Does not reveal confidential Departmental information
- Does not constitute a threat to the safety and security of the public, staff, inmates, or the facility/institution
- Acknowledges the participation and assistance of the Department
- States that material that is published/made publicly available is not endorsed by or are views of CDCR
- State that errors/omissions are the responsibility of the Principal Researcher