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# Gaining Approval From a Juvenile Correctional Agency to Conduct External Research

## The Perspective of a Gatekeeper

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There is little to no literature concerning effective ways to obtain approval from criminal or juvenile justice agencies to conduct external research. This article presents the results of a survey of state juvenile correctional research departments by the research director of a state juvenile correctional agency with the responsibility of reviewing external research proposals. The survey focused on factors that may impact the probability of research approval or rejection. Survey results reveal that “getting in” to conduct external research in juvenile correctional agencies may be conditioned by several factors including but not limited to the subject of research, the researcher himself or herself, and perhaps most important, the potential impact the research will have on the agency.

**Keywords:** *juvenile corrections; research approval; gatekeeper; institutional research; juvenile corrections*

## Introduction and Review of the Literature

The literature on doing research in criminal and juvenile justice agencies, although extensive, is primarily focused on doing research with the specific clients, actors, decision makers, and offenders within these agencies—research subjects that have been collectively referred to as “difficult populations” (Trulson, Marquart, & Mullings, 2004, p. 451). These difficult populations include but are not limited to prison inmates, the mentally ill, gang members, and serious and violent delinquents. The above populations are considered difficult because they may be difficult to access, difficult to trust, or difficult in the sense of eliciting useful information, among other factors. In general, the body of literature focused on doing research with difficult populations contains a wealth of information on such techniques as improving response rates, gaining trust, avoiding researcher bias, and eluding danger (Berg, 2004). Of the literature on doing research in criminal and juvenile justice, the literature on the methods and techniques of studying such populations is the most developed (Berg, 2004; Miller & Tewksbury, 2006; Pogrebin, 2003).

Coupled to the general body of literature on doing research with difficult populations, recent attention has been paid to gaining access to criminal and juvenile justice organizations in the first place—to either access the difficult populations mentioned above for an original study or to access agency-collected data for secondary analysis (Trulson et al.,

2004). Although the literature on gaining access is smaller and more fragmented than the literature on doing research with difficult populations, its history is rich with examples of the techniques, challenges, and pitfalls of trying to gain access to criminal and juvenile justice organizations.

Some of the earliest examples in the literature on gaining access to criminal and juvenile justice agencies can be found in the works of some of the earliest American prison sociologists. An examination of the work of Donald Clemmer (1958), Gresham Sykes (1958), Rose Giallombardo (1966), and Erving Goffman (1961), for example, gives some insight to the experiences these researchers faced while attempting to gain access to the relatively pristine correctional environments of the 1940s through 1960s. These researchers were followed by others whose studies on correctional life briefly examined the problems, issues, and solutions to gaining access to correctional organizations to either study difficult populations and/or access agency-collected data (Bartollas, Miller, & Dinitz, 1976; Crouch & Marquart, 1989; Dilulio, 1987; Fleisher, 1989; Irwin, 1985; Jacobs, 1977). Overall, these brief accounts of gaining entry to correctional organizations are replete with the message that entrance to correctional environments was conditioned by many factors. For the most part, gaining entry for these earlier prison sociologists entailed either becoming employed with the agency, being affiliated and/or endorsed by a respected agency, or having a contact or someone familiar with the agency vouch for their validity as a neutral and independent researcher (Trulson et al., 2004).

Some of the problems faced by early researchers of criminal and juvenile correctional organizations resulted from the perspective of criminal and juvenile justice administrators that researchers were "dangerous" (Dilulio, 1987; Sykes, 1958). The fear of the "outsider" was real, and was based on the belief that academic researchers without real-world experience and insight would view and interpret occurrences on the "inside" as scandals of mismanagement, but what those in the "field" considered common and ordinary (Dilulio, 1987; Sykes, 1958). Therefore, only those researchers who were known to the agency in some capacity (e.g., employed, endorsed, had a contact) were likely to obtain the level of access needed to accomplish any systematic study of correctional environments. Although it is certain that the nonaffiliated were allowed access to correctional agencies to some degree, it was perhaps likely that where this type of researcher could go and with whom they could speak was more tightly controlled than for the affiliated (Berg, 2001).

The criminal and juvenile justice agencies researched by early American sociologists and their successors have changed tremendously. This is perhaps no more true concerning the research approval process. Unlike the largely decentralized and informal processes of the past (see Marquart, 1986, 2001), correctional agencies today, in both the juvenile and adult arena, have evolved in terms of the potential researcher. Although "fear" of the outsider may still be a relevant concern among these agencies, it is perhaps no longer the case that correctional environments are only the province of the connected researcher. In a number of states, correctional systems have their own separate research departments or divisions or, at the least, individuals responsible for evaluating and making decisions as to who gets in and who does not to do research. Indeed, the research process in correctional environments has become more centralized and standardized, not unlike the functions of the Institutional Review Board (IRB) at the university level.

Yet despite these changes, there is a virtual absence of any literature in criminal and juvenile justice on the factors that may make approval to do external research more or less likely or more or less appealing to criminal and juvenile justice agencies and their administrators. Although extant literature does provide some insight on how one might approach an agency for access (see, e.g., Trulson et al., 2004), it comes only from the perspective of academicians who have done research with criminal and juvenile justice agencies and have only the point of view of those seeking to gain access for their research. Much different than that focus or than the literature on actually doing research with difficult populations, this article examines the process of gaining access to subjects and/or data from the perspective of the gatekeepers in juvenile correctional agencies.

### **The External Research Process of One State Agency**

The central office of the Texas Youth Commission (TYC) is located in Austin, Texas. The TYC is one of the largest juvenile correctional systems in the United States, holding more than 4,000 youth dispersed among several facilities across the state. Because of its size and other characteristics, the TYC is an attractive research destination for a number of potential researchers. Indeed, students and faculty from universities across the state, nation, and even other countries often contact the TYC to request conducting studies using TYC youth, staff, or data. By agency policy, these requests are reviewed and coordinated by the research director. The requests must include the following information:

1. Project title;
2. Names and qualifications of all project researchers;
3. Purpose (e.g., thesis, professional paper, dissertation);
4. Research design and methodology;
5. Number of and time required by each TYC youth if used in research;
6. Provisions for confidentiality of youth names and identification numbers;
7. Amount of TYC staff time needed;
8. Benefit to TYC or juvenile profession;
9. Research supervisor, if any (e.g., chair of Thesis/Dissertation Committee); and
10. Amount and source of funding, if any.

### **Agency Position on External Research in the Past**

The author of this article has worked for the TYC since 1983 and has been the research director since 1987. Although the official policy of the TYC concerning external research has changed little over the years, the receptivity of the agency to external research has changed considerably. In the past, the TYC approved most external research requests as long as they were not unduly burdensome in terms of staff time or youth time and as long as researchers signed a written agreement ensuring subject confidentiality and included proper informed consent from research subjects. Even studies that seemed to be trivial or self-evident were generally approved as a courtesy.

One procedure that has changed over the years has been informed-consent procedures. In the early years, the agency would act in the place of parents, and when required by university

IRBs, the agency would give parental consent for youth to participate in external studies approved by the agency, provided the youth agreed to participate as well. Several years ago, however, the legal interpretation changed such that parental consent for studies involving youth younger than age 18 would have to come from the legal guardian, not the agency. Although the agency still does not require parental consent for the studies it approves as a matter of official policy, most university IRBs require this consent from parents for minors. Obtaining this parental consent is another time-consuming effort, for often the researcher depends on the agency for assistance, and many legal guardians do not give consent. Some studies have used passive consent, informing the legal guardians that the youth will be allowed to participate if he or she chooses to do so unless the guardians formally object. Most guardians do not object; they just do not respond. As a result, several recent studies have restricted themselves to youth aged 18 or older to avoid this IRB restriction.<sup>1</sup>

### **Agency Position on the Receptivity to External Research Today**

Within the past several years, the TYC has received an increasing number of requests for external research. As a result, the current agency position is that a study involving youth time will only be approved if the results likely will have a direct benefit to the agency. Most current proposals do not meet that criterion, for the results of such proposals would be unlikely to have any bearing on agency policy or procedure. Any use of state resources (including secondary data requests) and youth time unlikely to benefit the agency are not considered cost effective but rather disruptive to the agency routine and hence treatment of the youth. One exception to this policy stance, which was characteristic of early prison research, is that the agency is more likely to approve requests by its own employees who are in school to help them obtain a degree, or when there is a particularly positive relationship between the agency and/or a particular facility and a local university, as local universities often are good sources for employees, interns, and other volunteers. Again, this exception is allowed because it may benefit the agency.

Another recent issue that has affected the agency's receptivity to external research today are the various and sometimes inconsistent requirements of numerous university IRBs. For example, to ensure subject confidentiality, some university IRBs have refused to allow the researcher to release data sets of the results with identifying information to the TYC Research Department.<sup>2</sup> The TYC has requested this release for studies that look to be especially useful or beneficial to the agency, so that among other things, they may track correlations of the responses with other indicators, such as future recidivism. In the event that the university IRB refuses release of the collected data, the TYC has been willing to sign an agreement that the individual responses would not be forwarded to the field staff and would not affect the respondent. The TYC has denied studies otherwise approved when the university IRB did not grant permission to forward the data set to the Research Department with such an agreement in place. Thus, the position and requirements of an IRB have perhaps had the unintended consequence of impacting the receptivity of research approvals today in that some IRB requirements have made certain research requests less beneficial to the agency.

The bottom line is that although the external research approval process of the TYC has not changed tremendously over the years, the receptivity of the agency to external research

has changed. Today, because of the numerous requests for external research and/or the requirements of certain university IRBs, among other reasons, those studies not likely to benefit the agency are viewed as a disruption of agency routine and a barrier to the treatment of youth and are routinely denied unless special considerations exist.

The brief example above on the evolution of research within the TYC relays that there are perhaps reasons that exist that make external research proposals more or less likely to be approved by the gatekeepers of juvenile correctional agencies. As such, this article seeks to examine the outlook of other state juvenile correctional departments when it comes to approval for external research and the factors that may impact approval or denial. In short, this article examines what may matter when one approaches an agency to conduct external research.

## Method

A letter was sent to the Research Department of each state's juvenile corrections agency asking (a) whether their agency ever approves of research by external parties concerning their agency, and (b) if so, to identify the factors used by the agency in determining whether to approve external research projects. Sixteen agencies responded (32%), with most including their relevant written policy. Fifteen of those responding agencies (30% of all juvenile corrections research departments in the U.S.) indicated that they do approve external research requests.

Of the 15 agencies responding that indicated that they do approve external research requests, a list of the factors identified from the responses and their general policies was created, and a 32-item, Likert-type scale questionnaire was distributed to each agency (see Tables 1 to 4 for the 32 items). Based on this questionnaire, each agency was asked to check the response that best represents the influence of the factor or condition as to whether or not their agency would approve an unsolicited external research proposal. The factors were divided into four categories: (a) subject matter, (b) cost-benefit, (c) participation, and (d) qualifications. The possible responses were *necessary*, *helpful*, *neutral*, *harmful*, *prohibited*, and *don't know*. These responses were selected to identify whether a factor was important enough alone that a study would not be approved without it (*necessary*) or could not be approved with it (*prohibited*), or if neither of these responses, if the factor had a positive (*helpful*) or negative (*harmful*) impact or no effect (*neutral*).

All 15 agencies, which were dispersed nationally and represented at least one state from all major regions in the United States, including small and large departments, completed the 32-item questionnaire. The number of responses for each item on the questionnaire is provided in the tables. Although a response rate of 32% is not high, and there was not a follow-up letter to nonrespondents, there was considerable consistency among the respondents in that in only 7 of the 32 items did some respondents report that a condition was helpful, whereas other respondents on the same condition reported that it was harmful. In short, what was helpful (or harmful) in one state was likely to be the same in other states, with the exception of 7 items.

## Results

### Subject Matter

There were 6 items concerning the subject matter of the research. Results in Table 1 reveal that the majority of the states indicated having a subject matter of medical research (question 1); cosmetic research (question 2) and/or pharmaceutical research (question 3) would be either prohibited or harmful to the probability of being approved, with the remaining research departments indicating that the effect would be neutral or not known.

As opposed to these more specialized and invasive forms of research, studies involving delinquency were viewed as either necessary or helpful to be approved in 12 of the 15 states (question 4), with 2 states reporting that the effect would be neutral and 1 state not answering the question. Just more than half of the states (8 of 15) said that a study involving the operations of the agency would be helpful, whereas most of the remainder said that content would be neutral in terms of its effect on being approved for external research (question 5). No state reported that it would be harmful. A study that involves a politically sensitive issue (question 6) was one of the factors for which respondents answered on both sides of the issue, with 2 states reporting that it would be helpful, 4 states reporting that it would be harmful, 7 states reporting that it would have a neutral effect, 1 one state not answering or replying *didn't know*.

### Cost Benefit

The survey had 13 items listed in the category of cost benefit. Results presented in Table 2 revealed that 14 states reported that it was either necessary or would be helpful if the results were likely to benefit the agency (question 7), with the other state reporting that agency benefit would have a neutral effect on whether the agency approved an unsolicited external research proposal. All states indicated that it was necessary to have a signed research agreement prior to project initiation (question 18). All states reported that it would either be necessary or helpful if the proposal has an appropriate research design (question 19) and requires minimal staff time (question 10). The vast majority of states indicated that it was either necessary or would be helpful if the agency (a) is allowed to review the results prior to publication (question 9), (b) has support of the location involved (question 17),<sup>3</sup> (c) includes the report dissemination plan in the proposal (question 14), (d) has the right to be identified as a collaborator on any product (question 8), or (e) the researcher agrees to make a formal presentation of the results to the agency (question 11), or (f) all data requested is already available on the agency computer (question 12).

Nine of the states indicated that it was necessary or would be helpful if the researcher will indemnify and hold the agency harmless (question 16), and the researcher will destroy the data when no longer needed (question 15). On none of the conditions previously mentioned above did any state indicate the condition would harm the chances for approval. For data available in manual files, however, 8 states indicated that this would have a neutral affect (question 13), 2 indicated that it would be helpful, but 4 indicated that it would either harm or even prohibit the chances of approval, possibly because this would be more time consuming than if it had already been available on the computer.



**Table 1**  
**Agency Responses to Subject Matter Questions**

Please answer each statement by checking the response which best represents the influence of the following factors as to whether or not your agency would approve an unsolicited external research proposal.

Question	Subject Matter	NE	HE	NT	HM	PR	DN
1	Involves medical research			3	3	8	1
2	Involves cosmetic research			2	2	9	2
3	Involves pharmaceutical research			3	2	9	1
4	Involves study of delinquency	4	8	2			1
5	Involves study of agency operations	1	7	6			1
6	Involves study of politically sensitive issue	1	1	7	4		2

Note: NE = necessary; HE = helpful; NT = neutral; HM = harmful; PR = prohibited; DN = don't know/no response.

**Table 2**  
**Agency Responses to Cost-Benefit Questions**

Please answer each statement by checking the response which best represents the influence of the following factors as to whether or not your agency would approve an unsolicited external research proposal.

Question	Cost-Benefit	NE	HE	NT	HM	PR	DN
7	Results likely to benefit agency	6	8	1			
8	Agency has right to be identified as collaborator on any project	6	3	4			2
9	Agency allowed to review prior to publication	10	3	2			
10	Requires minimal staff time	5	10				
11	Will make formal presentation of the results to the agency	3	9	3			
12	All data requested already available on agency computer	1	12	2			
13	Data available in manual files		2	8	3	1	1
14	Report dissemination plan included in proposal	5	7	3			
15	Researcher will destroy data when no longer needed	5	4	6			
16	Researcher will indemnify and hold agency harmless	7	2	5			1
17	Has support of the location involved	9	5	1			
18	Signed agreement between researcher and agency prior to project initiation	15					
19	Has appropriate research design	13	2				

Note: See note to Table 1.

## Participation

The survey had nine items in the participation category. These questions dealt with who would be participating in the study and conditions of that participation. The items were divided into youth and staff participation. Results presented in Table 3 revealed that 11



**Table 3**  
**Agency Responses to Participation Questions**

Please answer each statement by checking the response which best represents the influence of the following factors as to whether or not your agency would approve an unsolicited external research proposal.							
Question	Participation	NE	HE	NT	HM	PR	DN
20	Requires youth participation		1	11	2		1
21	If requires youth participation, is voluntary	10	2	2			1
22	If requires youth participation, requires youth consent form	12	1	2			
23	If requires youth participation, requires written consent from parents or guardian (not just agency)	11	2	2			
24	If requires youth participation, requires Institutional Review Board approval	8	2	2			3
25	If requires youth participation, compensation given to youth		1	6	3	2	3
26	Requires staff participation		2	12	1		
27	If requires staff participation, is voluntary	5	9				1
28	If requires staff participation other than supervision, staff may do on-duty	2	3	7	1		2

Note: See note to Table 1.

states indicated that having youth as participants would have a neutral effect (question 20), but 3 indicated that it would be harmful or prohibited in terms of the chances of being approved, with only 1 state indicating that it would be helpful. With youth participation being voluntary (question 21), youth consent forms (question 22), written consent from the parent or guardian and not just the agency (question 23) was either necessary or helpful in most states. IRB approval for studies requiring youth participation (question 24) was viewed as necessary or helpful in most states, yet in 2 states IRB approval had no effect, whereas in 3 states respondents did not know or respond concerning the impact of IRB approval on external research requests.

Only 1 state indicated that providing compensation to youth participants would be helpful (question 25), with 6 states reporting that it would have a neutral effect, 3 states reporting that it would harm the chances for approval, and 2 states indicating that compensation to youth to participate in studies is prohibited. In the author's state, compensating youths for participation in research studies is prohibited by practice, although not by official policy, because of the potential of setting a precedent after which youth would not participate in future studies unless compensated.

In addition to items on youth participation, three items in Table 3 inquired about the impact of staff participation on the probability of external research request approval. Twelve states indicated that having staff participation would have a neutral effect (question 26), 2 states stated that it would be helpful, and 1 state said that it would harm the chances for approval.

**Table 4**  
**Agency Responses to Qualifications Questions**

Please answer each statement by checking the response which best represents the influence of the following factors as to whether or not your agency would approve an unsolicited external research proposal.							
Question	Qualifications	NE	HE	NT	HM	PR	DN
29	Criminal record check given to external staff	3	3	6	1	1	1
30	Positive reputation of researcher	7	5	2			1
31	Researcher is an agency employee or intern, but research not part of job description		4	11			
32	Has endorsement of recognized research organizations, such as university, private foundation, or public agency with mandate to conduct research	4	9	2			

Note: See note to Table 1.

However, all states except one indicated that if the study required staff participation, it would either be necessary or helpful to have voluntary staff participation (question 27), with the one other state not responding to that question. Seven of the states indicated that having staff participate while on duty would have a neutral affect (question 28), whereas 5 states said that it would be helpful and 1 state indicated that it would harm the chances for approval.

## Qualifications

The survey contained 4 items concerning the effect of the qualifications of the researcher. Results presented in Table 4 show that 13 of the 15 states indicated having an endorsement of a recognized research organization (i.e., a university, private foundation or public agency with the mandate to conduct research) was either necessary or helpful, with 2 states indicating that it would have a neutral effect (question 32). Twelve states indicated that a positive reputation of the researcher (question 30) would be either necessary or helpful, with 2 states saying that this would have a neutral effect. Only 4 states reported that it would be helpful if the researcher was an agency employee or intern whose job description did not include research (question 31), with 11 states saying that it would have a neutral effect.

On the most diversely answered item in the survey, 3 states said that a criminal-records check of the researcher was necessary (question 29), 3 said that it would be helpful, 6 said that it would have a neutral effect, 1 said that it would have a harmful effect, 1 said that this was prohibited, and 1 did not respond to the question. Thus, 3 states view a criminal-records check of any external researchers as necessary before research approval can be granted, but some respondents indicated that it would help and others do not consider this. It is unclear why 2 states responding to this item considered a criminal records check as being either harmful or prohibited in obtaining research approval.

## Discussion

What factors make gaining access to a juvenile correctional agency to conduct research more likely? According to responses by the gatekeepers, the themes are quite consistent. The overall theme is that in today's juvenile correctional agencies, although research approval may be conditioned by several factors, it is perhaps most influenced by whether the research will benefit the agency—or at the very least, will not cause undue interference with the agency's operation. Much like the balancing act that university IRBs employ, weighing the risks of the research with the potential benefits, juvenile correctional agencies—or any criminal justice agency, for that matter—likely engage in a balancing act comparing the promise of the research to the impact it will have on the agency routine.

Although the present survey has a specific section called cost-benefit, the items listed in other sections of the survey could also be considered cost-benefit factors. Approval decisions for external research are made on the basis of a nonquantitative cost-benefit analysis, weighing expected benefits versus the costs to obtain them. Major costs typically associated with external research are staff labor and the disruption of the daily routines of staff and youth. All of the states said that it would either be necessary or helpful if the proposed study requires minimal staff time, and for research requests involving agency-collected data, most states indicated more favorable views to external research if the data requested is available on an agency computer.

It is somewhat surprising that most of the states indicated that having youth as participants would have a neutral effect. This result is surprising because it is considerably more difficult to have a study involving youth approved in the author's agency, as this results in time taken away from staff working positively with the youth and, in general, disrupts the regimented routine characteristic of most juvenile correctional institutions. An occasional study by a professor or graduate student is manageable, but over time, as individuals from several departments in several universities (or other agencies) across the state request paper-and-pencil surveys to be administered to youth, studies without a clear likelihood of a benefit to the agency cannot be supported.

Furthermore, what may be viewed as an advance to the general body of delinquency literature does not necessarily mean it is of direct benefit to a participating agency. Thus, what may be important in academe may have little bearing on an agency itself or the probability of research approval. From a gatekeeper's perspective, this is why it is important that any links between the results of the research and possible implications to the agency should be clearly delineated. Alternatively, even when a researcher clearly links the potential results to possible implication for the agency, the subject of the research appears to have an impact on the probability of research approval. The fact that there were more positive responses overall toward proposals involving the study of delinquency than to medical-based research, to studies of agency operations, and to studies of politically sensitive issues was not overly surprising. This finding suggests that there is some concern that the results of the latter studies could require additional unanticipated agency work to respond to or refute the results. Ideally, the proposal should show how the results could be beneficial to the agency without raising the prospect of significant additional unplanned work for responding to the research conclusions.

There is an additional possible benefit that was not included in the survey, but that is relevant to academicians, for their research is in many ways governed by the rulings of IRBs. Agencies want studies that are beneficial to them. Sometimes data gathered in a study are helpful for other agency purposes, including future studies correlating the data with other factors of interest, such as recidivism or institutional behavior. Academic IRBs are sometimes unwilling to allow the academic researcher to share the data with agency researchers with subject identifiers included for fear of negative consequences to the research participant. In most cases, youth participants sign an informed-consent document indicating that nothing negative will happen to them as a result of either participating or not participating in the study or because of the content of their responses. If such a consent form is not enough for individual IRBs concerning the protection of the subject, the agency should be willing to sign an additional agreement with the external researcher to the effect that the agency would not treat any subject differently based on the results of the study and that only the research staff, not the field staff, would have access to the individual responses. This approach would maximize the benefit to the agency and the external researcher without compromising the rights of the research participant.

## Conclusion

The results of this study, although not generalizable to all states, suggest some common themes to gaining access to conduct research in juvenile correctional agencies. The theme of agency benefit is perhaps most important, and potential researchers should be advised to clearly state how the research can be important to the agency. The potential researcher must also remember that although agency research and its results can be useful, the process can also be burdensome on the agency, and minimizing the potential impact of actually conducting the research can make research approval more likely. Although the subject or mandate of some research studies may be inherently problematic in juvenile correctional facilities today (e.g., medical research, etc.), the results of this article suggest that researchers can do something to increase their chances of success. Sometimes this may require that the researcher modify or improve on their requests—for example, allow the agency to be a collaborator, minimize staff time as much as possible, hold the agency harmless, and/or allow the agency to review and comment on results prior to publication. In other ways, the potential researcher may benefit from an appropriately conceived research design, come with a positive reputation, or get the endorsement of a recognized research organization. Although many of these suggestions will be dependent on the type of research requested and the investment needed by the agency, this may mean the difference between approval and rejection. These are just a few of the factors that the juvenile research departments surveyed in this study viewed as either necessary or helpful.

Perhaps the bottom line is that external requests to conduct research in juvenile and criminal justice agencies add to the duties already required of criminal justice professionals. Some research requests can include a significant investment from the gatekeepers, staff, and correctional clients and impose a heavy burden on the institutional routine. Perhaps the following is some helpful closing advice:

Remember, you are invading their turf, disrupting their routine, and creating a potential security risk. Not to mention that, unless you were solicited, it is likely they do not need you.... Your research will probably not tell administrators something that they do not already know.... Thus it is imperative to be ready to answer how the research will potentially benefit the agency. (Trulson et al., 2004, p. 462)

## Notes

1. The Texas Youth Commission (TYC) retains jurisdiction until the 21st birthday.
2. This only refers to studies in which original data is collected and excludes secondary data requests to which the TYC already has access to identifiable information, although identifiable data is never released to the researcher.
3. Generally, this is the local administrator of the facility providing the subjects.

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