

Philadelphia Department of Prisons (“PDP”) Data Disclosure Protocol

All requests for PDP data, for research or any other purposes, must conform to the following protocol. This protocol applies to interdepartmental data requests within the City of Philadelphia as well as external requests from Universities or other non-City third-parties. Researchers seeking PDP support for grant proposals must also follow this protocol before any letter(s) of support will be provided.

All researchers requesting PDP data must submit a thorough abstract research proposal inclusive of hypothesis, scope, methodology, data requests (including all data points/variables sought) and duration. All other (non-research) requestors seeking PDP data must submit a detailed explanation of the intended purpose and scope of use of the data. All data requests must be compliant with applicable state and federal laws including the Pennsylvania Criminal History Records Information Act (“CHRIA”). Please note that CHRIA will not permit the disclosure of identifiable medical, mental health, or substance abuse information of inmates for research purposes.

Approved de-identified or/aggregate data request reports must be submitted to the Commissioner or designee for approval prior to dissemination to the researcher. Thus, research involving questionnaires or surveys involving personal health information that readily identifies inmates for interviews will not be approved, not inclusive of extenuating circumstances for the continuum of care. No data can be shared by a contracted provider or staff of the PDP without the express written authorization of the Commissioner.

Additionally, no PDP data will be shared for research purposes unless/until an MOU or data license agreement is executed with the approval of the Law Department. The University or other institution affiliated with the researcher must be the party-in-interest to, and signatory for, the MOU or data license agreement. PDP will not support research projects without institutional backing from the University or other affiliated institution.

A research data base inclusive of the researcher, research proposal, data request, and PDP’s approval or denial will be maintained by PDP. All research and other proposals must be submitted at least thirty (30) days but no less than two (2) weeks in advance of any applicable deadlines for PDP’s response. The research proposal must not create any conflict of interest with either PDP employees or the City’s Institutional Review Board (“IRB”), and no contractor or staff of the PDP may serve as a co-investigator. The PDP and/or its contracted service providers cannot subcontract with a researcher, college, or university for a research proposal.

The PDP reserves the right to make recommendations concerning the proposal in the best interest of the Department. The researcher will be required to respond to the PDP’s recommendations in writing. The Commissioner or designee will forward the proposal to the Law Department for a liability/risk review. Upon receiving the Law Department’s satisfactory review, a final approval decision will be provided. Once approved, PDP will author a support letter which will indicate the specifics of the research proposal and include the signature of the Commissioner.

Approved city cross-departmental research proposals will be sent to James Moore, Director of the Health & Human Services Data Management Office for an MOU or data license agreement in consultation with the Law Department. Research proposals involving city cross-departments will not be executed until required parties sign the MOU.

No research proposal seeking PDP data is to be forwarded for IRB approval until it has been approved by the PDP Commissioner according to the above protocol.