**Guidance for Enrolling Foster Children in Research**

The Social Services Administration (“SSA”) of the State of Maryland Department of Human Resources (“DHR”) has [issued a mandatory policy](https://www.hopkinsmedicine.org/institutional_review_board/guidelines_policies/guidelines/ssa_child_welfare_policy.pdf) concerning the participation of children and families served by the SSA in human subjects research projects.

The SSA allows its clients (foster children) to participate only in the following types of human subject’s research:

* Research that the BSPH IRBs determine meets the definition of minimal risk (DHHS category 45 CFR 46.404); or
* Research that the BSPH IRBs determine the research presents a prospect of direct benefit to the potential pediatric participants (DHHS category 45 CFR 46.405).

Note:  The SSA will not approve enrollment of its clients in any research for which the BSPH IRBs determine the category to be DHHS 45 CFR 46.406 or DHHS 45 CFR 46.407).  Therefore, the IRBs may not approve requests to enroll foster children into such research projects.  Additionally, research submissions involving this population will not qualify for exempt review and must receive either expedited or convened IRB review as appropriate.

**BSPH IRB Process**: The PI will complete the [SSA Instruction Sheet and Form for Enrolling Children in Foster Care](https://www.jhsph.edu/offices-and-services/institutional-review-board/_pdfs-and-docs/foster-children-application-form.doc) and submit it along with other study documents in PHIRST (i.e., Protocol, Consent/Assent forms). The IRB will consider the request to enroll children in foster care as part of its review. If approved, and the non-exempt risk determination is 46.404 or 46.405, the approval of the request to include foster children will be contingent upon obtaining approval from the SSA. The PI will respond to the AWAC with the SSA RRB approval, a final executed MOU, and a revision to the research plan that explains how the PI will obtain the consents outlined by the SSA, as required by the local agencies. It may involve obtaining a signature from the designated social worker for the local social services responsible for the individual child, plus the signature of the child’s guardian.

In order to enroll foster children in any project a signed MOU between Vice Dean of Research and the Executive Director of the SSA must be uploaded into the PHIRST application. The MOU template will be provided by the SSA. The JHU PI must also sign this form. The Executive Director of SSA who will need to sign the MOU is: Michelle L. Farr, and the agreement must be reviewed, approved and signed by the Maryland Office of the Attorney General.

The BSPH IRB office will assist with the execution of the MOU.

This process may take time. The RRB meets monthly, and delays may occur due to quorum concerns and volume of submissions.

**After Initial IRB Approval:** The PI must send all future Amendment and Continuing Review approval letters to the SSA/RRB until the study is closed.

For additional details on enrolling foster children in your project please visit the link <https://www.hopkinsmedicine.org/institutional_review_board/guidelines_policies/guidelines/foster_children.html>