



An Employee-Owned
Research Corporation

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Appendix A-11. Statement of Confidentiality and Nondisclosure

EMPLOYEE OR CONTRACTOR'S ASSURANCE OF CONFIDENTIALITY OF DATA

Survey of SNAP and Work

Summary

The Survey of SNAP and Work project staff are firmly committed to the protection of confidential data obtained for the study. All primary and secondary data obtained for the study will be protected from unauthorized use or disclosure and rights of human subjects in research studies. This principle holds whether or not any specific guarantee of confidentiality was given at time of interview (or self-response), or whether or not there are specific contractual obligations to the Food and Nutrition Service, U.S. Department of Agriculture. When guarantees have been given or contractual obligations regarding confidentiality have been entered into, they may impose additional requirements, which are to be adhered to strictly. This commitment is crucial for the Survey of SNAP and Work because:

- It is required by our contract and by the ethical codes of contract research organizations; and
- Human subjects participating in research studies are promised and expect confidentiality and must have confidence in our commitment to it.

Three main types of information are to be protected from unauthorized disclosure or use:

1. The names and other identifiers of human subjects in research studies (i.e., information collected from or about persons or organizations participating in the study),
2. Data collected about human subjects in research studies, whether collected directly from the respondent, indirectly from another source, or learned incidentally. This includes data that is obtained by intervention or interaction with a respondent or data that is identifiable private information.
3. All other information collected or developed for the Survey of SNAP and Work, until release of such information has been approved. This includes research data with identifiers removed, data files, listing and sampling information, study findings, progress reports, project documentation, project reports and other project deliverables.

Procedures for Maintaining Confidentiality

1. All Westat employees, consultants, and subcontractors who may have access to confidential information must sign and comply with this assurance of confidentiality policy.

2. Westat employees, consultants, and subcontractors shall keep private the names of respondents, all information or opinions collected in the course of interviews, and any information about respondents learned incidentally. All shall exercise reasonable caution to prevent access by others to data in their possession.
3. Unless specifically instructed otherwise for a particular project, upon encountering a respondent or information pertaining to a respondent that an employee knows personally, s/he shall immediately terminate the activity and contact her/his supervisor for instructions.
4. Data containing personal identifiers in Westat offices shall be kept in a locked container or a locked room when not being used each working day in routine activities. Reasonable caution shall be exercised in limiting access to data to only those persons who are working on the specific project and who have been instructed in the applicable confidentiality requirements for that project. Where data have been determined to be particularly sensitive by the Corporate Officer in charge of the project or the President of Westat, such data shall be kept in locked containers or in a locked room except when actually being used and attended by a staff member who has signed this pledge.
5. If a separate file is set up containing identifiers or linkage information which could be used to identify data records, this separate file shall be kept locked when not being used in routine activities.
6. If records with identifiers are to be transmitted to another party, the other party shall be informed of these procedures and shall sign an Assurance of Confidentiality form.
7. The project director shall be responsible for ensuring that all personnel and contractors involved in handling data on a project are instructed in these procedures throughout the period of performance. At the end of the period of performance, the project director shall arrange for proper storage or disposition of data including any particular contractual requirements for storage or disposition. When required to turn over data to our clients, we must provide proper safeguards to ensure confidentiality up to the time of delivery.
8. The project director shall ensure that practices adhere to the provisions of the U.S. Privacy Act of 1974 with regard to interviews of individuals for the Federal Government. They will ensure that procedures are established in each interview to inform each respondent of the authority for the interview, the purpose and use of the interview, the voluntary nature of the interview (where applicable) and the effects on the respondents, if any, of not responding.

Compliance Requirements

Data collectors are expected to respect the privacy and property of survey respondents by adhering to this policy and the compliance requirements. Data collectors must review, accept, and acknowledge the following compliance requirements.

Compliance Requirements	INITIAL
1. I will preserve confidentiality, protect human subjects' privacy, and follow appropriate study procedures.	
2. I will keep the names of respondents confidential. I will also keep confidential all information or opinions collected in the course of study interviews, and any information about respondents learned during the study. I will not discuss information collected or observed with any other person, except for supervisors on the Survey of SNAP and Work.	
3. I will not disclose or use confidential information in a way that has not been authorized.	
4. I will devote my best efforts to preventing unauthorized or accidental disclosure of any survey data.	
5. I will devote my best effort to limit access to survey data to only those persons who are working on the Survey of SNAP and Work and only to those who have been instructed in the applicable confidentiality requirements.	
6. I will devote my best effort to maintain the security and protection of the data files collected on the computer provided by the Survey of SNAP and Work project staff.	
7. I will strictly follow all procedures for backing-up and transmitting data files. I will not implement data procedures that are not according to the Survey of SNAP and Work protocol.	
8. I will transmit data files to Westat via a secure internet connection as soon as possible, without delay.	
9. I will not transmit, transfer, or copy data files to any device that is not provided by the Survey of SNAP and Work staff or is not specified in the Survey of SNAP and Work training procedures and/or manuals.	
10. I will not delete data files from the computer under any circumstances.	
11. I will not email files or documents that have information that can identify other Survey of SNAP and Work staff, or survey respondents by name, age, gender, or address, or Survey of SNAP and Work.	
12. I will not record or copy any information obtained during data collection to any source or material other than the computer or study materials approved by the Survey of SNAP and Work.	

Compliance Requirements	INITIAL
13. I will report any potential or actual breaches of confidentiality or security procedures to supervisors immediately.	
14. I will comply with all applicable procedures and good practices required by Survey of SNAP and Work.	
15. I will ensure that there is compliance with this policy and all applicable procedures.	

PLEDGE

I hereby certify that I have carefully read and will cooperate fully with the requirements for protecting the confidentiality of human subjects and research information obtained for the Survey of SNAP and Work.

I will cooperate with and fulfill all related education and training requirements for the Survey of SNAP and Work. I understand that the requirements may change over time or expand in order to deal with special circumstances or client requirements.

I will keep private all information concerning individual respondents to which I gain access. I will not discuss, disclose, disseminate, or provide access to these data and identifiers except as authorized by Westat. In addition, I will comply with any additional procedures established by Westat for the Survey of SNAP and Work. I will devote my best efforts to ensure that there is compliance with the required procedures by personnel whom I supervise.

I understand that violation of this pledge is sufficient grounds for disciplinary action, including dismissal. I also understand that violation of the privacy rights of individuals through such unauthorized discussion, disclosure, dissemination, or access may make me subject to criminal or civil penalties.

I give my personal pledge that I shall abide by this assurance of confidentiality.

Printed Name

Signature

Date