

Appendix E. Data Confidentiality Agreement



Data Confidentiality Agreement for Employees and Contractors of Manhattan Strategy Group (MSG)

MSG Confidentiality Policy Statement

Manhattan Strategy Group (MSG) is firmly committed to the principle that the confidentiality of individual data obtained through data collection must be protected. This principle holds regardless of whether any specific guarantee of confidentiality was given at time of data collection or specific contractual obligations to the client. When guarantees have been given or contractual obligations regarding confidentiality have been made, they may impose additional requirements that must be adhered to.

Procedures for Maintaining Confidentiality

1. All MSG employees, subcontractors, consultants, and field staff involved in data collection and analysis shall sign this assurance of confidentiality. This assurance may be superseded by another assurance for a particular project.
2. Researchers, data collectors and field workers shall keep confidential any personally identifiable information about respondents, including personal, family, and business information. Data collectors will exercise due caution to prevent access by others to all such data in their possession.
3. Any data containing personally identifiable data will be locked in a secure container. Data access will be limited only to individuals working on the project, for necessary survey-related activities. These individuals will receive instruction on the protection of such data.
4. A data analysis file will be created with de-identified data. The original file that matches identifiers to the survey data will be kept under lock or in a password protected, encrypted file.
5. The project director is responsible for ensuring that all personnel working in the data collection and analysis are instructed in the procedures detailed herein.
6. At the end of the project, the project director will be responsible for the secure disposition of the data, or its secure storage, if required.
7. As required in this contract, the project director will coordinate with the Contracting Officer Representative (COR) for the submission of the final de-identified study dataset, including the use of secure transfer of a dataset that adheres to the client's guidelines.
8. The project director shall ensure that data collection practices adhere to the provisions of the U.S. Privacy Act of 1974 with regard to protection of individuals for the Federally funded projects. Project directors must ensure that procedures are established for each data collection to inform each respondent of the authority for the data collection, its purpose and use, the voluntary nature of the participation (where applicable) and the effects on the respondents, if any, of not responding.

Employee Pledge

I hereby certify that I have carefully read and will follow procedures outlined above. I will keep confidential all information from surveys concerning individual respondents to which I gain access. I will not discuss, disclose, disseminate, or provide access to survey data and identifiers except as authorized by the project director. 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: