

OMB Information Collection Request
Supporting Statement for the Collection of
Restricted Data Use Application Information

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

MCC is committed to making public the data underlying its investments in evidence-generating data activities, such as independent evaluations, as encouraged by regulations such as the [Foreign Aid Transparency and Accountability Act of 2016](#), [Foundations for Evidence-based Policy Making Act of 2018](#), and [Federal Data Strategy](#).

In addition, MCC is committed to sharing the data in a responsible and ethical manner, with a specific aim to protect the confidentiality of the data respondents as encouraged by the [Federal Policy for Protection of Human Subjects \(2018 Common Rule\)](#) and [Confidential Information Protection and Statistical Efficiency Act of 2002](#).

To accomplish both these commitments while protecting the data assets from inappropriate access and use, MCC has contracted an independent data steward, the University of Michigan's Interagency Consortium for Political and Social Research (ICPSR). MCC will deposit restricted-use data with ICPSR to manage access by qualified users in Virtual Data Enclaves (VDEs). Access to the restricted-use data will only be granted to respondents who meet eligibility criteria and agree to terms of access established by MCC, including agreeing to follow strict requirements for maintaining data confidentiality.

The collection of information described here is necessary for evaluating the eligibility of respondents to receive access and to manage their access to restricted-use data.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The Restricted Data Use Application collects information that will be used by the data steward, ICPSR, to evaluate whether respondents qualify for access to MCC's restricted-use data. The collected information is stored and used by ICPSR in accordance with ICPSR Privacy Policy¹. While the ICPSR Privacy Policy may evolve over time, the primary uses of this data are:

- a) to track data and documentation downloads for aggregated reporting purposes,
- b) to contact data users for annual updates to MyData account information,
- c) to contact data users regarding any changes to ICPSR access or confidentiality policies, and
- d) to contact data users regarding any issues with accessed data.

As described in the Restricted Data Use Agreement, the Agreement and related data is stored indefinitely by ICPSR for the specific purposes detailed in the ICPSR Privacy Policy.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

¹ <https://www.icpsr.umich.edu/web/pages/about/privacy.html>

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MCC's data steward will collect information for the Restricted Data Use Application electronically through a web portal maintained by the data steward and/or use online collaboration tools to increase efficiency and reduce burden.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

This is a unique collection that responds to the requirements of granting access to MCC restricted-used data. There are no other MCC information collections that seek this information, and no similar information is available from other sources known to MCC.

- 5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

Individuals will prepare and submit the Restricted Data Use Application, independent of the type of organization. Thus, there is no particular impact of the collection on small businesses or other small entities.

- 6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

The collection of information is structured to ensure protection of confidentiality while allowing access to the restricted-use data for statistical analysis purposes. Without the proposed collection, MCC could not make the restricted-use data accessible. This would reduce MCC's ability to expand access to data assets that inform evidence activities, reducing MCC's ability to maximize transparency and accountability in evidence activities, as supported by the [Foreign Aid Transparency and Accountability Act of 2016](#), [Foundations for Evidence-based Policy Making Act of 2018](#), and [Federal Data Strategy](#).

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**
- a) requiring respondents to report information to the agency more often than quarterly;**
 - b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
 - c) requiring respondents to submit more than an original and two copies of any document;**
 - d) requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
 - e) in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
 - f) requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
 - g) that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
 - h) requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

Under the Restricted Data Use Agreement, data users must notify the data steward, ICPSR, within five (5) business days of becoming aware of any (i) unauthorized access, use, or disclosure of restricted-use data, or (ii)

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access, use, or disclosure of restricted-use data that is inconsistent with the terms and conditions of the Restricted Data Use Agreement..

8. **If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

In accordance with 5 CFR 1320.8(d) on April 22, 2021, a 60-day notice for public comment was published, Document Citation 86 FR 21358, pages 21358-21359, Document Number 2021-08289. No comments were received.

A 30-day notice for public comment was published, Document Citation 86 FR 47160, page 47160, Document Number 2021-18086. No comments were received.

9. **Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payments or gifts will be provided to respondents.

10. **Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

As per ICPSR's Privacy Policy² and the Restricted Data Use Agreement, ICPSR pledges to maintain the personal information of data users securely to the extent allowable by law and take every precaution to protect it. ICPSR pledges it will not disclose, give, sell, or transfer any personal information about ICPSR data users, unless required for law enforcement or by statute, or upon mutual agreement between the data user and ICPSR. The system in which this information will be maintained is a privacy system, and MCC is in the process of filing a systems of records notice (SORN) to the Federal Register. A privacy impact assessment (PIA) is also being conducted and will be published to the mcc.gov public website before any information is collected from respondents.

11. **Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

No questions of a sensitive nature are included in the Restricted Data Use Application.

² [Privacy Policy \(umich.edu\)](http://umich.edu)

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12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under 'Annual Cost to Federal Government'.**

The affected public is expected to be researchers, including university and college faculty and students, who will use this data for statistical analysis. MCC estimates approximately 50 Restricted Data Use Applications annually to access MCC-funded restricted-use data. An application is led by one investigator and can encompass the full research team – i.e. the individuals who will access and use the data.

The estimated time to complete a Restricted Data Use Application is 90 minutes. This estimated completion time consists of 10 minutes to set up an online account for access to the web portal and upload the required supporting documentation for the application and 80 minutes to produce the supporting documentation, namely (i) the research proposal describing the statistical analysis purpose for which the restricted-use data is requested (40 minutes) and (ii) review of the Restricted Data Use Agreement (40 minutes).

This results in an estimated burden of 4500 hours total annually for Restricted Data Use Applications.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public**

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comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

There is no additional cost burden to respondents.

- 14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.**

MCC will incur the costs associated with the data steward's services, but there is no additional cost to the federal government in terms of staff or capital costs.

- 15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.**

The only adjustments that will be required in terms of costs/burdens reported above is in the event of misuse of restricted-use data. If an approved data user conducts unauthorized disclosure, or if there is an unauthorized disclosure such as through a breach of the restricted-use data system, then additional burden may be placed on the respondent to conduct risk mitigation and response.

- 16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

The information collected as part of the Restricted Data Use Application will not be published or otherwise shared beyond the specific purposes described above.

- 17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

MCC is not seeking exemption from the requirement to display the OMB approval expiration date.

- 18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."**

CERTIFICATE - <https://www.opm.gov/forms/pdfimage/omb83-i.pdf> The following is a summary of the topics, regarding the proposed collection of information, that the certification covers: (a) It is necessary for the proper performance of agency functions; (b) It avoids unnecessary duplication; (c) It reduces burden on small entities; (d) It uses plain, coherent, and unambiguous language that is understandable to respondents; (e) Its implementation will be consistent and compatible with current reporting and recordkeeping practices; (f) It indicates the retention periods for recordkeeping requirements; (g) It informs respondents of the information called for under 5 CFR

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1320.8(b)(3) about: (i) Why the information is being collected; (ii) Use of information; (iii) Burden estimate; (iv) Nature of response (voluntary, required for a benefit, or mandatory); (v) Nature and extent of confidentiality; and (vi) Need to display currently valid OMB control number; (h) It was developed by an office that has planned and allocated resources for the efficient and effective 2. management and use of the information to be collected (see note in Item 19 of the instructions); (i) If applicable, it uses effective and efficient statistical survey methodology; and (j) It makes appropriate use of information technology. If you are unable to certify compliance with any of these provisions, identify the item below and explain the reason in Item 18 of the Supporting Statement.

There are no exemptions to these topics. All topics are communicated to users through the Restricted Data Use Agreement.