Appendix C – Criteria for the Review and Disposition of Applications

Review Criteria for Project Proposal Review

Criteria	Description
Statistical Purpose	Project proposals must have a statistical purpose(s) (as opposed to a nonstatistical purpose).
Allowed Use	The data use described in the project proposal must be consistent with the privacy notices and/or informed consent statements used when the data were collected from respondents (i.e., individuals, companies, or establishments) or when acquired (e.g., administrative and proprietary data). The use must also align with allowed use as governed by statute, outlined in the Memorandum of Understanding, data use agreements, Privacy Act, and/or PRA statements or other documentation (e.g., Institutional Review Board (IRB) requirements) that govern data use.
Statistical Disclosure Limitation (SDL)	Consistent with the implementing regulation for U.S.C 44, Section 3582, and adhering to standard federal SDL methods (*79 FR 71609 - 71616*), project proposals must be able to apply sound, scientific SDL approaches, and techniques to the satisfaction of the agency or unit that minimize the risk of re-identification (i.e., of individuals, organizations, or establishments) to proposed statistical data information products (e.g., results, intermediate or final outputs). In addition to CIPSEA, additional legal or regulatory requirements for maintaining the confidentiality of responses may apply to agency-specific data collections.
Demonstrated Need	To justify the disclosure risk associated with access, project proposals must demonstrate that goals and objectives can only be met using confidential data assets, and that public data assets (where available) are insufficient to accomplish the project's goals and objectives.
Feasibility	To justify the disclosure risk associated with access and ensure the project's statistical purpose can be realized, a project proposal's goals and objectives must be achievable with the confidential data assets requested, considering the breadth of relevant constraints. Feasibility shall be considered with respect to the project design, the extent to which an agency or unit is resourced to support the project, and the ability of the applicant to execute the project. Feasibility shall include consideration of: • Project Design – Evaluating the feasibility of a project shall include consideration of the methodology, technical aspects, physical requirements (e.g., can the researcher's computing environment handle the purposed volume of data), practicality (e.g., is computing space in a data enclave available), logistical requirements (e.g., can the data assets be physically co-located for analysis), and timeliness (e.g., the project can be executed within the available timeframe). Applicants must provide adequate background information on the proposed methodology to enable evaluation. • Agency/Unit Support – Evaluating the feasibility of a project shall include consideration of whether the

Criteria	Description
	statistical agency or unit is able to adequately support the project. This shall include consideration of the physical requirements (e.g., can the research be done at the agency/unit), practicality (e.g., is adequate technical or programming support available), logistical requirements, timeliness (e.g., can the requested data/extract/series be prepared in time for the researcher), and other resources limitations.
	• Applicant's Ability – Evaluating the feasibility of a project shall include consideration of whether the applicant has the ability to execute the proposed project. This shall include a consideration of the applicant's knowledge, skills, and abilities. Applicants must provide adequate background information to enable evaluation.
Maintaining Public Trust	As is consistent with the practices and principles for statistical agencies and units, agencies must evaluate whether a project proposal supports their ability to maintain trust and credibility among data users and providers as well as to ensure public confidence is maintained. Grounds for a project proposal to be denied access to confidential data include an appraisal by the statistical agency or unit that the proposed project may diminish or put at risk the agency's ability to carry out its mission and/or collect data from the public and other data providers (e.g., state and local governments or firms).
Programmatic Benefit[1]	Project proposals must define a contribution(s) to the program under which the confidential data asset was collected, where the law requires.
Other legislative requirements[1]	Requests for confidential data assets may be evaluated under additional criteria if those criteria are deemed necessary based on a reasonable interpretation of the statutory authority or regulatory requirements applicable to the data collection or the statistical agency or unit.

[1] These criteria only apply to certain data collections or certain agencies.

Review Criteria for Applicant Review

Criteria	Description
Identification	Verification that the identity, position, institutional affiliation, and skill level of each applicant are consistent with the legal requirements for accessing the requested confidential data asset and the feasibility criteria evaluation (in project proposal criteria).
Training	Active (versus expired) completion of data use, data stewardship, and confidentiality training by each applicant (i.e., both general training and specialized training required by certain agencies)
Agreements	Active (versus expired) nondisclosure and/or institutional/cooperative data use agreement(s) with requisite signatures.
Investigation	If required, active (versus expired) clearance of a background investigation (i.e., National Agency Check with Inquiries

Criteria	Description
	(NACI) clearance or moderate background investigation (MBI) clearance).