

National Agriculture Statistics Service (NASS)

Data Access Security

The NASS mission is to provide timely, accurate, and useful statistics in service to U. S. agriculture.

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB number is xxxx-xxxx. The time required to complete this information collection is estimated to average 20 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.



Outline of Presentation

- Laws governing NASS authority for data collections
- Data Access locations, rules, and procedures
- NASS disclosure review

NASS Authority to Collect Data

- Title 7, U.S. Code, Sec. 2276 – Confidentiality of Information - Agriculture Title - 1985
- Confidential Information Protection and Statistical Efficiency Act (CIPSEA) of 2018, Title III of the Evidence Act.

Confidentiality

- Confidential information refers to information collected from an individual or establishment that
 - could be used to publicly identify respondents
 - was collected under a restriction about sharing the information with others.
- Confidential information may be referred to as restricted data, identifiable data, data from in-house files, or personally identifiable information (PII)
- Confidential information includes direct and indirect identifiers. Indirect are those that would identify individuals when combined with other data.

Confidential Information Protection and Statistical Efficiency Act (CIPSEA)

- How does CIPSEA Support Confidentiality?
 - All data are collected under a pledge of confidentiality.
 - It strengthens protection of statistical data for all federal government surveys.
 - Penalties for disclosure increased to Class E felony – 5 years in prison and/or \$250,000 fine.
 - It permits the designation of sworn agents to access for exclusively statistical purposes.
 - Sworn agents have the same responsibility to protect data as employees.

Statistical Purpose Defined

Statistical purposes

- Description, estimation, or analysis of the characteristics of groups, without identifying individuals or organizations that comprise such groups

Statistical purposes do NOT include:

- Use of information in an identifiable form that affects the rights, privileges, or benefits of a respondent
- Use of data for administrative purposes such as compliance with Federal regulations
- Access to confidential information in response to a Freedom of Information Act (FOIA) request

Respondent Protection

- NASS conducts the large majority of surveys on a voluntary basis, however the Census of Agriculture is the primary exception, since it is mandatory.
- It is critical for NASS to maintain the trust of respondents so they will complete NASS surveys.
- Low response rates decrease the quality of survey data and increase the costs.

Data Access Locations for Agents

- Virtual Data Enclave (fee based)

NASS Access

- NASS will facilitate access to a virtual data enclave with the approved data uploaded.
- **Sworn agents must read and understand the contents of the Data Lab Handbook.**
- NASS employee or representative will assist with questions regarding the operations of the enclave.

Rules and Procedures

- Sworn agents using the virtual Data Enclave are only permitted to access from an approved U.S. location, cleared by a virtual site inspection.
- All sworn agents must receive confidentiality training, sign an *ADM-43 Data Confidentially and User Attestation* forms. These forms bind sworn agents to the specific limitations for access and mandatory codes of conduct.
- All sworn agents are prohibited from the reproduction of any data or analysis including photography, screen clipping, or any other form of replication or reproduction.

Disclosure Review

- Anything to be removed from virtual data enclave must be reviewed by NASS for disclosure risk.
- NASS will review summaries and analysis for disclosure concerns and will apply suppressions where necessary.
- Anything that does not pass disclosure review cannot be released for public use or be used in any publications.

Disclosure Rules

- **Threshold Rule:** Every cell must be computed from a minimum of five (5) unweighted observations.
- **Dominance Rules:** All cells are checked for dominance. There are two rules used depending on the circumstances.
 - (n,k), top n producers represent more than k percent
 - P-percent, no one can approximate the largest producer to within p percent.

Dominance rule values are kept administratively confidential to give added protection.

Disclosure Review

- All cells failing the threshold or dominance rule must be suppressed and are considered a primary suppression.
- Complimentary cells must also be suppressed to prevent the deriving of primary suppressed cells.

Disclosure Reviews

- A complete list of the requirements for a disclosure review can be found in the Data Lab Handbook.
- All files in a disclosure review request are reviewed as a unit.
- Incomplete disclosure review requests will be rejected, and resubmission will be necessary.
- NASS recommends allowing at least 30 days to process each disclosure review request.

Requirements for Disclosure Reviews

- The requirements for each disclosure review must include
 - The program code used to generate results
 - A list of variables used in the analysis
 - A description of all modeling techniques used
 - Visualizations must include underlying data
 - All summary statistics must be weighted and be accompanied by
 - Total weighted and unweighted number of contributing records for **each summarized cell**
 - Unweighted values from each of the top two contributing records for **each summarized cell**

Disclosure Review Using Weights

- All summary statistics including aggregated totals and means must be weighted.
- NASS will not authorize the release of record level values (e.g., maximums or minimums)
- NASS strongly encourages but does not require the use of weights for modeling purposes unless intended for publishing.

Closing Comments

- Confidentiality is the key to maintaining the trust and the cooperation of respondents.
 - And it is the LAW!
- As a sworn agent, confidentiality is your responsibility.

Quiz

1. Confidential Information Protection and Statistical Efficiency Act (CIPSEA) permits designation of sworn agents to perform analysis for exclusively statistical purposes excluding which one of the following:
 - a) Description of the characteristics of groups without identifying individuals or organizations that comprise such groups
 - b) Estimation of the characteristics of groups without identifying individuals or organizations that comprise such groups
 - c) Analysis of the characteristics of groups without identifying individuals or organizations that comprise such groups
 - d) Use of information in an identifiable form that affects the rights, privileges of such groups
 - e) None of the above

2. The NASS mission is to provide timely, accurate, and useful statistics in service to U. S. agriculture.
 - a) True
 - b) False

3. Sworn agents using the virtual Data Enclave are permitted to access data from any location, including outside the United States.
 - a) True
 - b) False

4. Disclosure review requests may
 - a) Take up to 30 days
 - b) Be rejected if incomplete
 - c) Require resubmission, if rejected
 - d) All of the above

5. Anything to be removed from virtual data enclave must be reviewed by NASS for disclosure risk.
 - a) True
 - b) False

6. NASS will review summaries and analysis for disclosure concerns and will apply suppressions where necessary. Anything that does NOT pass disclosure review
 - a) Cannot be released for public use or be used in any publications
 - b) May be published to a limited audience
 - c) Can be released with accompanying disclaimers
 - d) None of the above

7. All sworn agents must
 - a) receive confidentiality training
 - b) sign an ADM 43 Data Confidentially form
 - c) sign an ADM 44 User attestation form
 - d) all of the above

8. The signed forms bind sworn agents to the specific limitations for access and mandatory codes of conduct.
 - a) True
 - b) False

9. All sworn agents are prohibited from the reproduction of any data or analysis including
 - a) photography
 - b) screen clipping
 - c) any other form of replication or reproduction
 - d) all of the above

10. Sworn agents must read and understand the contents of the Data Lab Handbook.
 - a) True
 - b) False