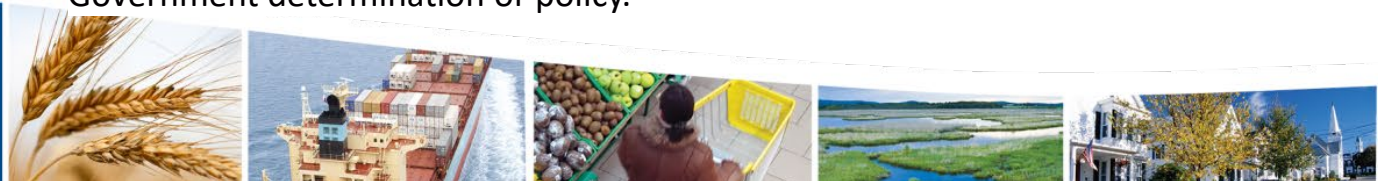


Disclosure Review Challenges in a Small Federal Statistical Agency

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The findings and conclusions in this presentation are those of the authors and should not be construed to represent any official USDA or U.S. Government determination or policy.



The mission of USDA's **Economic Research Service** is to anticipate trends and emerging issues in agriculture, food, the environment, and rural America and to conduct high-quality, objective economic research to inform and enhance public and private decision making.

Where does disclosure review and disclosure avoidance fit?

- Disclosure review and disclosure avoidance techniques required by:
 - ERS economists and researchers producing ERS research output
 - External researchers using ERS CIPSEA protected, proprietary, administrative, or other confidential data



Outline

- Overview of ERS Data Disclosure Review Board (DDRB) activities
- Ongoing challenges and opportunities
 - Cumulative disclosure risk of many publications from a single data source
 - Need for two levels of disclosure review of preliminary tables and final publications
 - Resources and staffing for disclosure review
 - Developing an agency culture around disclosure and data security



Overview of ERS Data Disclosure Review Board (DDRB) activities

- DDRB operates under authority of ERS Data Governance Board
- Chartered committee of the ERS Office of the Administrator
- Does NOT conduct disclosure reviews; role is in setting policy, developing trainings, etc.
- Membership
 - Permanent: Data deputy from each of 4 ERS divisions (one serves as chair)
 - Rotating: 2-5 non-management members who perform disclosure reviews or have an interest in data disclosure



Purpose of Data Disclosure Review Board (DDRB)

ERS DDRB Charter:

“The overarching goal of the ERS Data Disclosure Review Board (DDRB) is to **support the ERS Data Governance Board (DGB)** in its efforts to **ensure that all data and analysis released or shared by the Economic Research Service (ERS) adheres to the confidentiality requirements of the Confidential Information Protection and Statistical Efficiency Act of 2002 (CIPSEA), Privacy Act, Section 208 of the E-Government Act of 2002, and all other applicable statutes and agreements.**

This includes

- researching and keeping apprised of current methods for disclosure avoidance,
- **proposing policies and setting methodologies** underlying confidentiality protection,
- establishing **processes to facilitate the review** of pre-release ERS information products for potential disclosure concerns,
- and helping ERS **employ best practices in addressing disclosure risk.**”

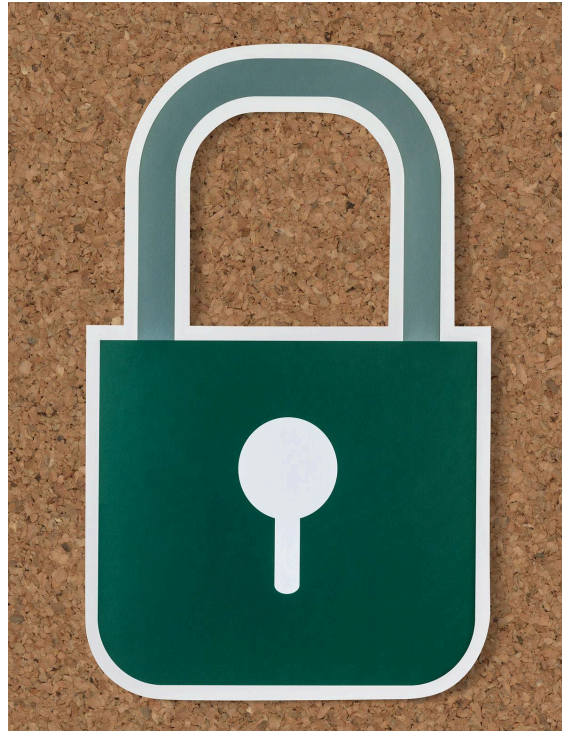


Partnership with external disclosure experts

- Received funding from ERS administrator to focus on DDRB/Disclosure issues
- Monika Hu (Vassar College) and George Stamas (contractor formerly from BLS)
- Significant boost to ERS capacity and expertise
- Conducted interviews with other small statistical agencies about DRBs
 - Learned a lot – let us know if you want to chat!
- Developing training for ERS disclosure reviewers
- Developing training for all ERS research staff



ERS DDRB: Ongoing challenges and opportunities



Cumulative disclosure risk of many publications from a single data source

Risk

- Datasets that have been used frequently to produce a lot of public output
- Cumulative disclosure risk if information from multiple publications used together

Ongoing challenge

- Difficult to monitor all outputs and all statistics released
- Did not find a solution in discussions with other agencies
- Currently focused on ensuring individual outputs meet disclosure guidelines



Need for two levels of disclosure review of preliminary tables and final publications

Risk

- Even if tables or figures are cleared and do not present a disclosure risk, authors may add information in text that is disclosive
- Examples:
 - reporting a minimum or maximum in text
 - reporting a retailer name from proprietary data

Solutions

- Use of data enclaves with cursory review from enclave and review from subject matter experts for all tables/figures
- Data use agreements with outside researchers require manuscript reviews
- Educating/reminding data users of importance of getting all final output reviewed for disclosure, even if tables/figures were cleared
- Focus on agency culture



Resources and staffing for disclosure review

Challenge

- Do not have dedicated disclosure reviewers
- Internal disclosure reviewers are primarily researchers/economists and conduct disclosure review as other assigned duty or service
- Lack specific training in disclosure review or disclosure avoidance

How we're mitigating

- Train multiple disclosure reviewers for a dataset so the burden for review is lighter
 - Researchers/economists like being able to discuss reviews and learn from one another
- Developing training for reviewers
 - In-house training
 - Census disclosure trainings



Developing an agency culture around disclosure

- Require annual CIPSEA training for ALL ERS staff
 - Agency administrator stresses importance to staff through all-staff meetings, internal blog
 - Require all staff complete Acknowledgement of the Protection of Nonpublic Datasets
- Greater focus on data security and guidelines
 - New documentation on data storage and sharing guidelines
- Agency has subject matter expertise, not disclosure expertise
 - Working to ensure at least a minimum level of knowledge regarding disclosure
- Partner with external collaborators to develop disclosure avoidance training for all research staff
 - Series of dry-runs to obtain feedback from staff across the agency in different roles and make sure training is meaningful



Agency culture, cont'd

- Acknowledgement of disclosure review required for agency clearance

Data Sources Used*

No data sources used

Was confidential/proprietary data used?* Yes No

Was a data disclosure/risk review completed?* Yes No

Did you include a USDA disclaimer?* Yes No

It is the responsibility of the author and product coordinator to ensure proper disclosure review.

Screenshot from ERS internal Portfolio Approval and Management System



Great progress and ongoing work

Progress and strengths

- DRB is established
 - Weekly meeting provides opportunity to discuss issues, questions, etc.
- Disclosure review process in place
- Use of enclaves to protect data
- Trainings well received by staff
- Support from senior leadership
- Making strides in increasing awareness of DDRB/disclosure issues

Challenges and opportunities

- Resources and staffing
- Cumulative disclosure risk still unclear
- Ingesting and/or developing new datasets will need new disclosure review protocols and new disclosure avoidance guidance
- Heavily dependent on staff knowing and doing the right thing



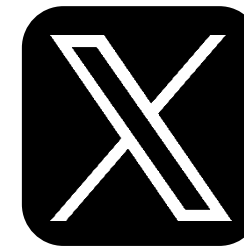
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