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March 14, 2022

Shalanda D. Young
Acting Director
Office of Management and Budget
Executive Office of the President
Washington, DC 20503

Submitted via www.regulations.gov

Re: OMB-2022-0001, Comments on the Interagency Council on Statistical Policy's recommendation for a Standard Application Process (SAP)

Dear Ms. Young,

On behalf of the Population Association of America (PAA) (www.populationassociation.org) and the Association of Population Centers (APC) (www.populationcenters.org), we are pleased to submit comments in response to a *Federal Register* Notice published by the Office of Information and Regulatory Affairs, Office of Management and Budget, Executive Office of the President, on January 14, 2022 (Citation OMB-2022-0001). This notice requested comments on the Interagency Council on Statistical Policy's recommendation for a Standard Application Process (SAP) for requesting access to certain confidential data assets.

PAA is the premier professional, scientific society for more than 3,000 behavioral and social scientists—including demographers, sociologists, economists, epidemiologists, and statisticians—who study the causes and consequences of population change. Our members conduct research and train scientists at U.S. universities and independent research organizations. The APC is composed of approximately 40 federally funded, interdisciplinary population research centers nationwide.

Our members are active users of confidential data from many different federal agencies and are especially reliant on accessing data through the Federal Statistical Research Data Centers (FSRDCs) around the country. They disseminate their findings based on Federal confidential data to policymakers, stakeholders, and the public. Given these important connections, our members have an important stake in the procedures for obtaining access to confidential data across the Federal statistical system.

PAA and APC are broadly supportive of standard application process (SAP) for access to confidential data and appreciate the work on this topic that has been conducted by the Commission on Evidence-Based Policymaking (CEP). However, in providing comments in response to the *Federal Register* Notice, we do have some suggestions and feedback on the SAP policy.

1. A single, unified application portal for data users is a very attractive feature of the SAP. It is important that such a portal be user friendly and user focused. For example, it should include strong user guidance as well as support for answering questions and resolving issues that arise in the application process. Having user support that connects directly to administrators at the appropriate agency to answer specific questions about application procedures, data availability, and other issues would be especially valuable.

The unified application will allow users and administrators to develop institutional knowledge about preparing applications and anticipating and will help them to avoid potential problems. At the same time, administrators of the SAP should offer regular outreach to the user community to provide education about data and metadata availability, application procedures, answer questions about data and procedures, and provide other relevant information. These outreach efforts could occur through webinars, presentations at professional association meetings, and other venues that would have large and diverse audiences of prospective data users.

2. The governance of the SAP should include representation from the user community, including the institutional partners (universities) of the FSRDC network, professional organizations such as ours (PAA/APC), and others. Such representation will provide an avenue for the user community to provide feedback to SAP managers and administrators about aspects of the process that work well and areas for improvement.
3. Federal agencies should be encouraged to disseminate their Authorization Level 4 data through the FSRDC system, which has broad geographic coverage as well as protocols for providing remote data access. The FSRDCs have a secure platform and the ability to handle a large volume of users, data files of substantial size, high computer processing needs, and a large community of knowledgeable users. Although the FSRDCs have a single model for data access and use, the option of remote data access that emerged during the pandemic provides an attractive model for future expansion and for facilitating access to Authorization Level 3 data as well.
4. Variable level metadata is critical for researchers to understand the content of restricted data files. These metadata should be available broadly to the research

community in order to democratize knowledge about the contents of restricted data files, and will consequently promote their use by a broader cross-section of the research community.

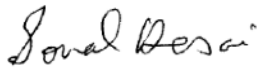
We understand that the set of core metadata most useful for the SAP Data Inventory may evolve over time; however, we recommend that a set of minimum standards be defined and applied across all items in the Data Inventory as early as possible. One concrete suggestion is for the restricted data files to clearly indicate what additional data elements would be gained over and above those available in comparable public data files or in relationship to the items in a questionnaire in the case of restricted data files based on data from a federal survey. The SAP Data Inventory should also have a consistent standard of inclusion for metadata of auxiliary data sets such as geographic codes, industry codes, and crosswalks.

5. Having a maximum duration for review times is a highly desirable policy. However, the 12-week maximum duration is quite a long time to await a review, and structuring the procedures around this duration may lead to longer average review times. Hence, we would strongly recommend that there be a target for median review times and we suggest that this should be 6 weeks. Further, agencies should be encouraged to conduct reviews as quickly as possible, and the portal should display the average times for each agency for the previous year (or some appropriate reference period). Finally, the portal should inform individual researchers about how long their proposal has been in the queue.
6. We recommend against the use of limited time windows in which applications will be accepted. Such windows could lead to very long timelines for researchers to obtain access to the data—for instance, if they narrowly miss an application window. These windows may serve to discourage applications for data access because of this feature. Especially if combined with the 12-week review time, an inopportune application window could make the duration from beginning an application to receiving approval unnecessarily long.
7. Harmonization of security clearance/individual authorization is a major strength of the proposed SAP. The Researcher Passport developed by the Inter-university Consortium for Political and Social Research (ICPSR), with support from the Sloan Foundation and the National Science Foundation, would be an attractive way to implement this clearance procedure for the research community (<https://radius.icpsr.umich.edu/radius/passport>). One attractive feature of the Researcher Passport is that it can be used for non-Federal sources of restricted data as well.

8. Standardized levels of requirements and access protocols for data based on the level of risk seems appropriate and hopefully will facilitate easier access to restricted data with lower levels of disclosure risk.

Thank you for giving the population research community an opportunity to comment on the Standard Application Process Policy. On behalf of our members, we look forward to improved access to Federal restricted data files in the future when the SAP policy is implemented.

Sincerely,



Dr. Sonalde Desai
President
Population Association of America



Dr. Sara R. Curran
President
Association of Population Centers