Policy Considerations for Government Use of Online Testing

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Any views expressed are those of the author and not necessarily those of the U.S. Census Bureau.

Topics of Consideration

- Paperwork Reduction Act Requirements

- Collection Authority

- Confidentiality Protection
  - Requirements
  - Expectations

Paperwork Reduction Act Requirements

- Gathering data from 10 or more persons requires OMB Clearance.

- Agency vehicles
  - Generic Clearance Package
  - Fast Track

- Giving required policy/legal notice

Collection Authority

- Examples:
  - Title 13 – Census collections
  - Title 26 – Federal tax data

- Relevance?
  - Confidentiality protection required by Title 13 and Title 26.
  - Check your agency's authority and the associated confidentiality protections.

Confidentiality Protections: Requirements (1)

- Legal protections
  - Title 13 – Census Bureau
  - Title 26 – IRS
  - CIPSEA – Other Statistical Agencies
  - Others?

- What does YOUR agency require?

Confidentiality Protections: Requirements (2)

- Do you need to collect Personally Identifiable Information (PII)?
  - Name, Address, Date of Birth, Phone, etc.
  - Combined data elements can be identifiable
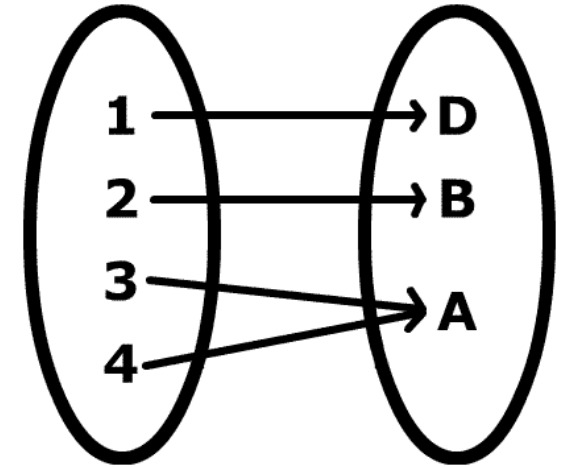- What would be the real and/or perceived harm of a data breach?

Confidentiality Protections: Expectations

- Public Perceptions
  - How do your respondents expect their data will be protected?
  - What would the impact be of a data breach?
  - Could there be harm to participants?

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Mapping Policy to Practice

- Needs:
  - Title 13 Confidentiality Protection
  - Ability to collect PII

- Solutions:
  1. Internally developed/controlled system
  2. 3rd party system that would run on our own servers (Standards Working Group)
  3. 3rd party system that has completed FedRAMP moderate certification and our own Authority to Operate process

Conclusions

- Agency by agency assessment
- Important to assess both real and perceived risks

Thank you!

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