

SAP Standard Review Criteria

The SAP policy ([M-23-04](#)), section 4.1, establishes the standard review criteria. These are listed below.

For brevity, some footnotes have been removed. To view the full version, please refer to [M-23-04](#).

To assess project proposals, statistical agencies and units will use the following standardized review criteria, as well as any other considerations where required by law or regulation, to determine the projects' suitability. Statistical agencies and units will review, confirm, and note deficiencies in requests for confidential data assets consistent with the following criteria:

1. **Statistical Purpose**—Project proposals must have a statistical purpose (as opposed to a nonstatistical purpose).
2. **Allowed-Use**—The data use described in the project proposal must be consistent with any restrictions on use of a specific data asset. These restrictions often stem from promises or commitments made to information providers, such as through a Privacy Act notice (e.g., in a survey), an agreement such as a Memorandum of Understanding (e.g., when administrative data are acquired from another government agency), or a contract (e.g., when proprietary data are acquired from an external organization). The use must also align with uses permitted by statute. Two examples of allowed-use related scenarios that are grounds for proposal rejection are (1) appraisal by the responsible statistical agency or unit that the proposed project is inconsistent with any promise or commitment, or statutory provisions, under which the data were collected or acquired; or (2) an applicant cannot show permission from a provider of external data that they propose to link to the confidential data asset for which access is being requested.
3. **Statistical Disclosure Limitation (SDL)**—Consistent with any implementing regulation under 44 U.S.C. § 3582, and adhering to requirements to apply sound SDL methods, project proposals must be able to apply sound SDL approaches and techniques to the satisfaction of the agency or unit that minimize the risk of re-identification of individuals, organizations, or establishments to proposed statistical data information products (e.g., intermediate outputs or final outputs).³³ In addition to CIPSEA, additional legal or regulatory requirements for maintaining the confidentiality of responses may apply to agency-specific data collections. The common application form established in Section 3 shall require enough information about the proposed reporting of results or output to facilitate a robust review under the SDL criteria.
4. **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.
5. **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 is resourced to support the project, and the ability of the applicant to execute the project.
 - a. *Project Design*—Assessing the feasibility of a project shall include consideration of methodology, technical aspects, physical requirements (e.g., the capability of the researcher's computing environment to handle the purposed volume of data and the necessary Federal cybersecurity requirements), practicality (e.g., the availability of computing space in a data enclave), logistical requirements (e.g., whether the data assets

can be physically co-located for analysis), and timeliness (e.g., whether the project can be executed within the available timeframe). Applicants must provide adequate background information on the proposed methodology to enable assessment.

- b. *Agency/Unit Support*—Assessing the feasibility of a project shall include consideration of whether the agency is able to adequately support the project. This shall include consideration of the physical requirements (e.g., whether the research can be hosted at the agency/unit), practicality (e.g., the adequacy of available technical or programming support), logistical requirements, timeliness (e.g., whether the requested data/extract/series can be prepared in time for the researcher), and other resource limitations.
 - c. *Applicant's Ability*—Assessing 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 capabilities. Applicants must provide adequate background information to enable assessment.
6. **Maintaining Public Trust**—As required by 44 U.S.C. § 3563, and consistent with codes of practice for statistical agencies and units,³⁴ agencies must assess 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.³⁵ 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, local, Tribal, or territorial governments or firms).

To ensure that review criteria remain standardized across statistical agencies and units, as required by CIPSEA, additional review criteria are only permissible when necessary to meet Agency or data asset specific legal or regulatory requirements. These may include:

- a. *Programmatic benefit*—Where required by law, project proposals must define contributions to the program under which the confidential data asset was collected. (For example, access to confidential Census Bureau Data may only be granted if the proposal provides a benefit to the Census Bureau's Title 13 programs.)
- b. *Additional criteria*—Requests for confidential data assets may be assessed under additional criteria only 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.