

## Data Linkage Checklist For Project Contacts

### I. When Must Project Contacts Fill Out This Checklist?

If a proposed research project is in-scope (see pages 2-4 of policy) for the *Data Linkage Policy*, before submitting the project for review and approval, the Project Contact (PC) responsible for the project must fill out this checklist. The checklist can either be filled out electronically within the Census Bureau's centralized electronic tracking system or it can be filled out on paper and uploaded there. Please address Sections II through V of this checklist.

### II. Project Proposal Meets Data Linkage Policy Criteria

I, the Project Contact (PC) responsible for the content of the data linkage project description in question, attest that my proposal meets EACH of the following three criteria outlined in the *Data Linkage Policy*: Mission Necessity, Best Alternative, and Public Good Determination (see pages 5-7 of policy).

MARK ONE:

- YES**, my proposal meets the *Data Linkage Policy's* Mission Necessity, Best Alternative, and Public Good Determination Criteria.
- NO**, my proposal does not meet these *Data Linkage Policy* criteria.

### III. Risk and Sensitivity Assessment

Please fill out both Sections III and IV; the information you report in these two sections will determine the sensitivity of your project and the next steps in the approval process. In Section III, below, you must document any aspect of your project that applies. In Section IV, you must document certain aspects of your project that might result in an additional review step (i.e., PC presents to the Data Integration Policy Committee (DIPC) and/or the Data Stewardship Executive Policy Committee, DSEP, for a formal decision). The Policy Coordination Office staff will review your responses and alert the Project Contact if further steps are necessary.

CHECK ALL THAT APPLY:

- This proposed linkage involves data sets that were all collected by the Census Bureau (using the authority in Title 13, Section 6 to collect the data), including reimbursable surveys.
- This proposed linkage involves data sets that were collected by the Census Bureau with information from other agencies (e.g., Title 13 survey data linked to Title 42 administrative records).
- This proposed linkage involves purchased commercial data sets or publicly available, free data (e.g., data from web scraping, county tax records, etc.).<sup>1</sup>
- This proposed linkage will result in a file involving a universe that contains 80 percent or more of all U.S. households or persons.<sup>2</sup>
- This proposed linkage involves matching the total universe of records available in one or more of the data sets, as opposed to limited matching to a sample of records.
- This proposed linkage involves longitudinal matching of individual or household records or use of a longitudinal dataset.
- This proposed linkage involves a sensitive topic (including but not limited to: abortion; alcohol, drug, or other addictive products; illegal conduct; illegal immigration status; information damaging to financial standing, employability, or reputation; information leading to social stigmatization or discrimination; politics; psychological well-being or mental health; religion; same-sex partners; sexual behavior; sexual orientation; taxes; and other information due to specific cultural or other factors. The Census Bureau considers religion a uniquely sensitive topic and has a specific policy on the collection of information about religion).
- This proposed linkage involves a sensitive population (including but not limited to: children, cognitively impaired persons, comatose patients, the elderly, limited English-speaking or non-English-speaking persons, noncitizens, prisoners, impoverished and terminally ill patients, and small minority groups, such as Native Americans. The Census Bureau considers residents of shelters for battered or abused women and children uniquely sensitive and does not permit inclusion of them in any reimbursable data collection).
- This proposed linkage may pose a conflict of interest or create a perception issue for the Census Bureau (e.g., the perception that statistical products may be used for law enforcement or political purposes rather than statistical purposes).

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<sup>1</sup> This includes publicly available information purchased by the Census Bureau (e.g., listings of stock prices compiled by private firms).

<sup>2</sup> Basis of selecting 80 percent was to capture linkages involving, for example, the entire decennial or economic census.

- This proposed linkage will produce output that expands the content on individual persons or households.
- This proposed linkage will produce output that will eventually be released as a Public Use File (PUF) or a Public Use Microdata Sample (PUMS) file.
- This proposed linkage will be carried out solely with economic data.

#### **IV. High and Moderate Sensitivity/Public Perception of Risk Default**

Certain kinds of data linkage proposals will default to a moderate and high sensitivity rating. These types of proposals are of such a sensitive nature that they automatically merit a higher level of review. Please check ALL items that apply to this project proposal:

CHECK ALL THAT APPLY:

- HIGH SENSITIVITY** linkage projects are those that require the use of individual names and/or Social Security Numbers (SSNs) in order to conduct the linkage
- MODERATE SENSITIVITY** linkage projects are those that:
  - Involve linkages between two mandatory demographic censuses or surveys; or
  - Involve linkages between a Census Bureau-sponsored mandatory demographic census/survey and a voluntary survey; or
  - Involve the study of sensitive topics or sensitive populations or the use of data from sensitive data sources; or
  - Create a conflict of interest or a perception issue for the Census Bureau.
- LOW SENSITIVITY** linkage projects do not fall into any of the above categories.

#### **V. Submit Your Checklist**

Complete your Data Linkage Checklist in the Census Bureau's centralized electronic tracking system or complete it on paper and upload it there.

PCO will evaluate the data linkage proposal and checklist to assign a sensitivity rating to your project during the policy portion of the project review process. PCO will contact you regarding the next steps you must take in seeking approval for your project.

The following actions must occur to document and mitigate sensitivities for projects considered with the scope of this policy:

**HIGH SENSITIVITY Projects:** Project Contacts (PCs) are required to present the proposal to the Data Integration Policy Committee (DIPC) and then the Data Stewardship Executive Policy Committee (DSEP). The presentation to DIPC will prepare the presenter for their presentation to DSEP, where an approval decision on the linkage proposal will be rendered. The DSEP will also determine how accessible the linked dataset will be to the Special Sworn Status (SSS) individuals.

**MODERATE SENSITIVITY Projects:**

- Involving linkages between two mandatory demographic censuses or surveys must be presented to and may be approved by the Data Integration Policy Committee (DIPC), provided other sensitivities associated with the project do not merit further review. PCO staff or DIPC will also determine how accessible the linked dataset will be to the Special Sworn Status (SSS) individuals.
- Involving linkages between a Census Bureau-sponsored, mandatory demographic census/survey and a voluntary survey will be reviewed by PCO staff to determine whether the project should be presented to the Data Integration Policy Committee (DIPC) for an approval decision.
- Involving the study of sensitive topics, sensitive populations, the use of data from sensitive data sources (such as credit card data, remittance payments, or credit bureaus), or that create a conflict of interest or a perception issue for the Census Bureau will be reviewed by PCO staff to determine whether the project should be elevated to the DSEP Chair or the full DSEP committee for an approval decision. If a linkage is elevated to the full DSEP committee for approval, it must first be presented to the Data Integration Policy Committee (DIPC).

**LOW SENSITIVITY Projects:** No further action is necessary.

PLEASE NOTE: Project Contacts are required to store this completed checklist, including Section VI below (to be completed by PCO), in the Census Bureau’s electronic tracking system, along with all other project documentation.

**VI. PCO/DIPC/Assoc. Dir./DSEP Sensitivity Level Decision and Documentation**

PCO will fill out this section and return the Checklist to the PRC or PC, as appropriate.

1. PCO, DIPC, DSEP Chair, or DSEP decision on sensitivity level:

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2. Restrictions on data for SSS: \_\_\_\_\_

3. Date of PCO, DIPC, DSEP Chair, or DSEP decision: \_\_\_\_\_

PCO last updated this Checklist on 11/5/2018.