
The "Interagency Confidentiality and Data Access Group"

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The Federal Committee on Statistical Methodology (FCSM) was organized by the Office of Management and Budget in 1975 to "...investigate problems, which affect the quality of Federal statistical data, as well as make suggestions for improving statistical methodology in Federal agencies" (Gonzalez, 1995, p. 262). The work of the FCSM is conducted by subcommittees organized to study particular issues. Typically, the results of a subcommittee's deliberations are published in FCSM's series of "Statistical Policy Working Papers" (SPWP's). In 1994, FCSM released SPWP 22, *Report on Statistical Disclosure Limitation Methodology*. The focus of this SPWP was to review the statistical methods used by Federal agencies and their contractors who release statistical tables or microdata files that are collected from persons, businesses, or other units under a pledge of confidentiality. It contains a "primer" of basic statistical methods to limit disclosure, a summary of current agency practices, recommendations for improving disclosure limitation practices, and a research agenda for the future.

In 1995, the Interagency Confidentiality and Data Access Group (ICDAG) was formed to (1) promote the goals and objectives of SPWP 22 and (2) foster increased cooperation and sharing of statistical disclosure methods among Federal agencies. Staff members of statistical agencies who worked in the "confidentiality area" expressed a need to have a forum where they could communicate among themselves and exchange ideas. The ICDAG provides such a forum.

In 1997, the FCSM wanted to add alternative formats, in addition to its subcommittees, to better facilitate communication and cooperation among agencies. FCSM called this new format an "Interest Group." The ICDAG, which had been informally affiliated with the FCSM since its start, became the Committee's first "Interest Group."

This paper provides general information about the ICDAG--why it was started, its objectives, goals, mem-

bership, and activities. However, before describing the ICDAG, it is important to understand the role of the FCSM in the Federal statistical system.

■ The Federal Committee on Statistical Methodology

In 1975, the Office of Management and Budget (OMB) organized the Federal Committee on Statistical Methodology. The Committee is comprised of approximately 18-20 Federal statisticians, economists, and managers who have an interest in improving the quality of Federal data. Individuals are asked to serve because of their expertise; they do not serve as representatives of their agencies. Once appointed to the Committee, individuals retain their membership for their entire Federal careers.

A major activity of the FCSM is the analysis of methodological issues. Methodological issues are proposed by FCSM members, and final decisions are made by the entire Committee. Once a topic is selected, an FCSM member is appointed to serve as chair of a subcommittee. The other members of a subcommittee are appointed based on their expertise in the topic being studied--for the most part, these individuals are not members of FCSM. In general, deliberations of the subcommittee result in a Statistical Policy Working Paper. Once a report is issued, the subcommittee disbands.

At this time, twenty-six SPWPs have been released.¹ The reports in this series cover a wide range of topics, including the quality of establishment surveys (SPWP 15), data editing (SPWP 18), and the use of indirect estimators in Federal programs--sometimes called "small area estimation" (SPWP 21).

The Committee also sponsors conferences. The proceedings from each conference are contained in the Working Paper series.

Maria Gonzalez was the chair of FCSM from its

inception to her untimely death in 1996. The current chair is Nancy Kirkendall. For more details about FCSM, see Bradburn (1995), Fienberg (1995), Gonzalez (1995), Groves (1995), and Sirken (1995).

SPWP's on Statistical Disclosure Methods

Statistical disclosure is the only topic that has been covered twice by the Working Papers:

- ❑ SPWP 2, *Report on Disclosure and Disclosure-Avoidance Techniques*; and
- ❑ SPWP 22, *Report on Statistical Disclosure Limitation*.

Two of the members of the SPWP 2 subcommittee also served on the subcommittee that produced SPWP 22. The continuity provided by these members was very valuable.

What happened in the 16 years that intervened between SPWP's 2 and 22 to cause the FCSM to revisit the topic of statistical disclosure? Several events prompted this reinvestigation:

- ❑ The advances made in computer technology. Computational power has increased dramatically, while, at the same time, the cost of computers has decreased.
- ❑ The Federal government is releasing more and more statistical data products, especially public-use microdata. In addition, the number of agencies releasing public-use microdata has increased.
- ❑ The availability of computerized data bases that contain lots of information has grown rapidly. Consequently, there are more external data available that can be used to reidentify respondents of confidential Federal surveys.

These changes are captured in the titles of these two FCSM reports, with the earlier one using the phrase "disclosure avoidance" and the later one "disclosure limitation." The former phrase would seem to imply that an agency could avoid risk, i.e., reduce risk to near zero;

however, the later phrase acknowledges the fact that disclosure can only be limited--it cannot be reduced to zero. While statistical agencies do their best to minimize the risk of disclosure, some risk always exists, no matter how small.

■ **How ICDAG Got Started**

The year after SPWP 22 was issued, several members of the subcommittee were contacted by other Federal employees who wanted help in dealing with agency-specific confidentiality and statistical disclosure issues. Based on these interactions, it became clear that referral to the relevant publications was not sufficient and that the interagency sharing, which the subcommittee experienced (and continued to have), was needed by others in the Federal statistical system. Typically, in each Federal agency, there is only a handful of staff members who have knowledge of statistical disclosure limitation methods and related issues; consequently, more can be learned by talking "across" agency boundaries than within a particular agency.

Subsequently, early in 1995, the late Maria Gonzalez was consulted about the feasibility of forming a "confidentiality group" that would be informally associated with FCSM. She was supportive and encouraged the effort. ICDAG held its first meeting in the fall of 1995. The "core group" of members came from the subcommittee responsible for SPWP 22. In addition, approximately 16 other individuals were invited to participate. Nancy Kirkendall, who was the chair of SPWP 22's subcommittee and a member of the FCSM, became ICDAG's liaison with FCSM.

■ **ICDAG's Structure--How It Operates**

As with all new groups, there is a growth period, and the way in which ICDAG operates has evolved over time. The Interagency Group meets quarterly and will continue to do so for the near future. Initially, plans were to precede each meeting with a seminar; however, this limited the amount of time that the group could spend discussing issues. Plans now are to have at least one longer meeting per year that is not preceded by a seminar.

Focus and Objectives

The focus of the group is methodological and has as its pillars the main options that statistical agencies have for protecting the confidentiality of the data they release:

- "Restricted data" methods, i.e., statistical methods to limit disclosure in public-use microdata files and tables; and
- Procedures for allowing restricted access to data, i.e., imposing conditions on who may have access to data, for what purposes, at what locations, etc. For an excellent discussion of such "restricted access" procedures, consult Jabine (1993).

ICDAG provides a "safe setting" (a term coined by Marsh et al. in their 1991 paper) in which sensitive disclosure limitation and data access topics can be discussed. It also provides an opportunity for those who work in the "confidentiality area" to get to know each other and gain name-and-face recognition. Developing trust, collegiality, and camaraderie were other goals.

Another important objective was to have the group be inclusive rather than exclusive. That is, membership was not limited to a specific number of individuals but was to include any individual who was working in this area and/or needed assistance in solving a particular problem.

Operational Procedures

The following operational procedures were implemented:

- Guidelines were developed to keep the group focused on its goals and objectives (see Appendix A, "Statement of Purpose");
- Since its structure was new for the FCSM, FCSM members wanted to be informed of what ICDAG was doing. This was accomplished in two ways:
 - ICDAG's chair is a member of FCSM through the duration of his/her term. He/she presents

a summary of ICDAG's activities at each FCSM meeting.

- ICDAG members are asked to provide summaries of activities to individuals who are FCSM members and in the same agency. (Note--not all agencies represented on the FCSM have a member on ICDAG and vice versa.)
- The chair is rotated among the agencies and limited to a one-year term. Duties of the chair are to maintain the membership list and organize quarterly meetings. The vice-chair serves as the secretary.

Becoming FCSM's First Interest Group

While ICDAG had been operating successfully as an informal group in 1995 and 1996, there were certain advantages to becoming formally affiliated with the FCSM. For one, many Federal employees felt that they could more easily justify participation to their managers if ICDAG was a formally constituted group under the aegis of OMB. In 1996, Nancy Kirkendall became head of FCSM and was very interested in expanding the range of FCSM's activities. In February 1997, ICDAG became FCSM's first official "Interest Group."

Conforming to the Federal Advisory Committee Act (FACA)

One issue was how to comply with FACA--see guidance provided in the *Federal Register* (General Services Administration, 1987). The two alternatives were:

- Make it a public meeting where anyone could be a member. This option would require a notice of meetings in the *Federal Register*; or
- Have a closed meeting and restrict membership to Federal employees. According to FACA, contractors and/or consultants could participate in a closed meeting if they had been hired by one of the participating agencies, and the contracting agency determines that the contractors and/or con-

sultants did not have a conflict of interest.

Both alternatives have advantages and disadvantages. After discussion, it was decided to allow only Federal employees to become members and to operate with closed meetings. Some reasons that prompted us to come to this decision follow:

- ❑ The sensitivity of the topic since privacy and confidentiality are "hot topics" in today's society.
- ❑ There is a very vocal sector that has been called the "privacy lobby," which would surely attend open ICDAG meetings. Under such a scenario, the methodological focus of ICDAG could easily be diverted into a forum for members of this lobby who do not distinguish between the administrative and statistical data collection activities of the Federal government, have little understanding of the Federal statistical system, and may be oriented toward legalistic interpretations and solutions.
- ❑ Open meetings would inhibit/prohibit frank discussion of restricted-access procedures and statistical disclosure methods. One major purpose of ICDAG is to foster an environment where alternatives and hypothetical options could be discussed freely among the ICDAG members who represent different agencies. As noted earlier, a "safe setting" for discussing these sensitive topics was desirable.
- ❑ Finally, there were concerns that if ICDAG was an open meeting, and if we had methodological discussions or described hypothetical situations in such a setting, we might find these discussions the subject of an article or column in one of the privacy publications or newspapers (the fear behind this concern was that current practices and/or hypothetical methods might seem to be "unsound" to a lay audience, and a reporter might want to expose this).

Membership

Currently, the following 16 Federal agencies are represented in ICDAG: Agency for Health Care Policy

Research, Bureau of the Census, Bureau of Economic Analysis, Bureau of Labor Statistics, Energy Information Administration, Environmental Protection Agency, Federal Reserve Board, Health Care Financing Administration, Housing and Urban Development, Internal Revenue Service's Statistics of Income, National Agricultural Statistics Service, National Cancer Institute, National Center for Education Statistics, National Center for Health Statistics, National Science Foundation, and OMB's Office of Statistical Policy. Consultants to three of these agencies also attend meetings.

Membership is determined by ICDAG members. In general, membership is at the "worker bee" level and not at the managerial level. While membership has fluctuated a bit from quarter to quarter, ICDAG seems to be in a growth mode. In its first two years, membership was between 25 and 30.

■ **Activities**

During its short existence, ICDAG has made good inroads in facilitating coordination and cooperation among Federal agencies. Some of its activities are listed below:

- ❑ *Start implementing recommendations and the research agenda from SPWP 22:* For example, BLS provided funds to the Census Bureau to develop a nonconfidential version of the cell suppression software used for the economic censuses.
- ❑ *Serve as resource to other Federal agencies (not just statistical agencies):* For instance, the Department of Housing and Urban Development (HUD) wanted to release a public-use file based on administrative data collected for certain housing programs. ICDAG members provided background literature, suggestions, and alternatives for HUD to explore.
- ❑ *Share among one another:* A good example of this activity is the work being done by ICDAG members to develop a "generalized checklist on the disclosure potential of microdata files and tabular data releases." The Census Bureau's "disclosure checklist" provided the basis for this en-

deavor, and ICDAG members have been working to generalize the Census's checklist into a product that could be used broadly across the statistical system. ICDAG members from the National Center for Health Statistics (NCHS) have taken a lead in this effort and have modified the checklist for use by NCHS employees who want to use "sensitive, non-public data" while working at home under Flexiplace.

- *Address new issues not covered in SPWP 22:* For example, some statistical agencies make record linkage software available so that it can be used by others who need software to do matching. Of course, the sharing of software produced by Federal agencies is a very good idea. Yet, this same software could possibly be used for malevolent purposes by "hackers" to compromise the confidentiality of data that the agency releases. So, what should an agency do? What are the risks? Is there need for a systemwide response?
- *Give talks on statistical disclosure limitation methods to various audiences:* ICDAG arranged a seminar for the Health Care Financing Administration's committee that was reviewing the agency's confidentiality procedures.
- *Keep abreast of work in progress and emerging issues:* For instance, the Energy Information Administration (EIA) contracts with the Census Bureau to conduct its Manufacturing Energy Consumption Survey (MECS). EIA and Census have been working together to improve the disclosure protection for MECS. This joint effort has been discussed from time to time at ICDAG meetings.

■ Discussion

At the time ICDAG was formed, there were three goals for the group:

- To enable staff in different agencies to gain name-and-face recognition of those in other agencies who have similar interests. Disclosure/confidentiality staff are often isolated because the work is typically a decentralized activity in an agency. In

addition, the size of the disclosure/confidentiality staff is small; "practitioners" move, and expertise is lost.

- To provide a nonthreatening environment that would make it easy for individuals to ask questions and/or seek advice across agency boundaries.
- To have agency staff who are faced with the prospect of releasing statistical data realize that there are several ways to facilitate access to data. No one size fits all--what is "best" for one agency may be totally inadequate for another. For instance, releasing a public-use microdata file might be best for certain uses (and users), while, for others, a restricted access procedure may be preferable (for an example of a restricted access approach that has been quite successful, see Reznick et al., 1997, for a description of the Census Bureau's Research Data Center Program). Agency staff need to know that many tools are available to them when making decisions about access.

In large measure, steps to accomplish these goals were taken, and the Group has begun to move into new areas. ICDAG members are energetic, and the group has taken on a life of its own. At present, interest in ICDAG is quite strong. It is anticipated that ICDAG will continue to flourish.

■ Endnotes

- ¹ The papers in this series are available on the Internet (<http://www.bts.gov/fcsm/methodology>). Alternatively, copies can be ordered from NTIS Document Sales, 5285 Port Royal Road, Springfield, VA, 22161 (703-487-4650).

Author's Note: The views expressed in this paper are those of the author and do not necessarily represent those of the Bureau of Labor Statistics.

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Appendix A

Interagency Confidentiality and Data Access Group's Statement of Purpose (Rev. 7/14/97)

Background

- The Interagency Confidentiality and Data Access Group (ICDAG) was formed for two main reasons. First, staff members of statistical agencies who work in the "confidentiality area" expressed a need to have a forum where they could communicate among themselves, exchange ideas, etc. Second, ICDAG is a follow-on activity for Statistical Policy Working Paper 22 (SPWP 22), *Report on Statistical Disclosure Limitation Methodology*.
- ICDAG is the first interest group of OMB's Federal Committee on Statistical Methodology (FCSM).

Membership, chair, and duties of chair

- The members of ICDAG are Federal employees who are responsible for (and/or working on) statistical disclosure limitation methods, administrative procedures to enhance researcher access to confidential statistical data, an agency's Disclosure Review Board, etc. ICDAG must comply with the Federal Advisory Committee Act. Consultants and contractors of the participating agencies can attend meetings in support of their work for their sponsoring agency if the ICDAG member from that sponsoring agency determines that there is not a conflict of interest.
- The core group of ICDAG members are those individuals who served on the FCSM subcommit-

tee that produced SPWP 22.

- The ICDAG chair will serve a one-year term.
- The chair of ICDAG is a member of FCSM for the duration of his/her term. He/she attends the FCSM meetings and reports on ICDAG activities.
- The chair decides on ICDAG membership, after consulting with current ICDAG members and Nancy Kirkendall, FCSM chair.

Objectives

- Look for opportunities to implement the recommendations and research agenda contained in Chapters VI and VII of SPWP 22.
- Disseminate SPWP 22 "beyond the beltway."
- Share current research activities.
- Explore new research ideas.
- Serve as a forum where other government entities (agencies, their contractors, etc.) can get assistance on confidentiality and access issues.
- Stimulate and/or renew interest in the academic community to pursue research in relevant areas.
- Possibly organize a special contributed session for each American Statistical Association (ASA) annual meeting.

Schedule of meetings

- ICDAG will meet four times a year.