

## Disclosure Review Board

This document describes steps to obtain Disclosure Review Board clearance of data prior to public release.

### **a. What does disclosure assurance entail?**

Title 13, U.S.C., Section 9 prohibits the publication or release of any information that would permit identification of any particular establishment, individual, or household. Disclosure assurance involves the steps taken to ensure that Title 13 data prepared for public release will not result in wrongful disclosure. This includes both the use of disclosure limitation methods and the review process to ensure that the disclosure limitation techniques used provide adequate protection to the information.

### **b. What kinds of information need disclosure protection?**

All data collected or maintained by the Census Bureau under Title 13, U.S.C., need disclosure protection. This includes Title 13 information commingled with or enhanced by information from other sources. Commingled files link Census Bureau data with survey or administrative records information from another survey or agency and/or statistics from other sources. For example, the Census Bureau uses federal tax information in lieu of direct data collection for single employer establishments and appends demographic information from the Social Security Administration's Numident File of applications for Social Security Numbers to data collected for minority-owned businesses and to some of its demographic survey respondents' records. In addition to Census Bureau disclosure limitation requirements, some commingled information may be subject to disclosure protections from the source agency, as well.

### **c. How can I protect my Title 13 data? Are there different disclosure limitation methods for different kinds of data?**

The Census Bureau uses a number of different disclosure limitation techniques to protect Title 13 data—rounding, top-coding, data swapping, thresholds, random noise, cell suppression and complementary cell suppression, to name a few. Methods differ depending on whether the release is for tabular data, public-use microdata, or statistical model output. For basic information on these techniques, see *Statistical Policy Working Paper 22: Report on Statistical Disclosure Limitation Methodology*, published by the Office of Management and Budget's Federal Committee on Statistical Methodology—this report is available on the Intranet at: [www.fcsm.gov/spwptbco.html](http://www.fcsm.gov/spwptbco.html).

For specific information on current Census Bureau disclosure limitation practices or assistance

in developing appropriate disclosure limitation techniques for a specific type of release, consult the Statistical Disclosure Limitation staff in the Statistical Research Division.

**d. Once I apply these methods and feel confident that my data have been protected, can I release them?**

No, data cannot be released until further clearance has been completed. After applying disclosure limitation protections to tables, public-use microdata, model output, or any other types of information, the project manager must submit the data to be released to the Disclosure Review Board (DRB). The DRB will review the material to ensure adherence to Census Bureau policies on release of data based on Census confidential information.

**e. How do I submit a request to the Disclosure Review Board (DRB) for disclosure review?**

The project manager should write a formal memorandum to the Chair, DRB, requesting clearance for the release of the data. The memorandum should contain detailed information about the data set, including a completed copy of the *Checklist for Disclosure Potential of Data* and any other information that will help the DRB determine what the disclosure issues are for the data set. Examples of additional information include frequency tables for identifying sparse variables, record layouts, and, in the case of new data collections, the questionnaire and data collection procedures.

**f. What is the *Checklist*?**

The *Checklist for Disclosure Potential of Data* is a general list of questions developed by the DRB to elicit responses from the data producers that help the DRB learn about the data set and identify potential disclosure issues. The data producers are asked what disclosure limitation methodologies (if any) have been used to protect the data from disclosure; what other similar data have already been released (by the Census Bureau or other agencies) that could be used to identify individuals or establishments; and, if data from the same survey were approved for release last year, how does the new release differ. Questions like these help the DRB determine what additional measures may be needed (if any) to ensure protection of individual respondents. A copy of the *Checklist* can be obtained from the Intranet at: [cwww.census.gov/msdir/index.html#SRD](http://cwww.census.gov/msdir/index.html#SRD).

**g. How long does a DRB review take?**

The DRB generally meets weekly to discuss pending requests. A quorum of DRB members is needed to approve a release. On average, the project manager should submit the formal request for clearance one to two months before planned release. That time permits the DRB to address other pending requests, review the material submitted by the project manager, and request and review additional output (if needed). As a result of DRB discussions, the project

manager may be asked to make changes to the final data set before release—e.g., collapsing some sparse cells or releasing data at a higher level of geography. Once a DRB decision is made, the Chair, DRB, will send a formal memorandum to the project manager, providing the recommendations of the Board.

Note: Data producers and/or project managers are encouraged to informally contact the Chair, DRB, early in the data production schedule, to identify any significant disclosure issues presented by the proposed data set. Such interactions can save resources and expedite the release of the data. It is important to remember, however, that **advance contacts** with the Chair or the full DRB **do not represent disclosure review clearance**.

**h. Once I receive the DRB's clearance, are there other approvals needed in order to release my data?**

In the formal DRB approval memorandum, approval is usually provided unconditionally, with no other clearances needed, aside from any required by the division, office and directorate. Sometimes conditional approval is provided, contingent upon some specific change to the data set. Then the data must be changed, as requested, prior to release. Other times, when administrative records are involved, conditional approval may be provided, pending any further clearances required by the source agency.

**i. What can I do if the DRB denies my request to release the data set?**

In most cases, when the DRB has concerns about the release of a data set, they will work with the project manager and data producers to address their concerns. If the DRB still denies a request to release a data set, then the project manager should formally document the reasons why there are not disclosure issues present in the data to be released and submit those arguments in an appeal to the DRB. If there is still no resolution, then the case is appealed to the Data Stewardship Executive Policy Committee for a final decision. These further steps are rarely needed.

**j. Do all data require DRB review prior to release?**

No, data that do not require DRB review include sensitive personnel information, which is confidential under the Privacy Act; information collected for another agency under their own authority—i.e., Title 15 data, which actually belong to the sponsoring agency; information acquired from other agencies—as long as it is **not** commingled with Title 13 data—which may or may not require review by the source agency or organization; already published data; and synthetic data, once the DRB has confirmed that the underlying data set contains only synthetic data that cannot be used to identify any particular individual. The DRB will, however, provide advice about releases of Privacy Act or Title 15 data, if asked.

**k. Are there others with responsibilities involving disclosure assurance?**

Yes, in order to ensure disclosure assurance of Title 13 information, the Associate Directors shall:

- C Establish nondisclosure rules for their areas that cover the publication of summary data, public-use microdata, and statistical estimates or model output. These rules must be approved by the DRB, prior to implementation.
- C Issue rules in numbered memoranda signed by the appropriate Associate Director. These memoranda shall:
  - C list the rules to be implemented, and
  - C determine what portion of the rules, if any, may be made available to the public.

***Under Title 13, U.S.C., disclosure protection rules and memoranda are Census confidential and must be protected from disclosure and release, unless otherwise noted.***

- C Require project managers to submit all data planned for release to the DRB for review and clearance.