



**Interagency Council on  
Statistical Policy**

Leaders of the United States Federal Statistical System



**Standard  
Application  
Process**

# STANDARD APPLICATION PROCESS ANNUAL REPORT FOR 2023

This document includes the SAP Annual Report for 2023, which provides recommendations to streamline security credentialing for Federal statistical agencies.

Date: February 2024

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## Executive Summary

The SAP has transformed how users apply for access to Federal confidential data. To ensure ongoing leadership and support for the SAP, the Office of Management and Budget's (OMB) [Memorandum Establishment of Standard Application Process Requirements on Recognized Statistical Agencies and Units \(M-23-04\)](#) establishes the Standard Application Process (SAP) Governance Board as the executive steering committee for the SAP. M-23-04 also calls for the SAP Governance Board (SAP-GB) to submit a report to the Director of OMB on recommendations to facilitate the sharing and acceptance of an SAP applicant's completed security credentialing requirements across recognized statistical agencies and units (RSAUs), as recognized by OMB, to reduce duplication that is a burden to both applicants and agencies (see pages 5-10). These recommendations are included in this 2023 SAP Annual Report, as required under the SAP Governance Board (SAP-GB) [Charter](#) which specifies that, in fulfillment of its responsibility to monitor the operation of the SAP, the SAP-GB will deliver to the Director of OMB and to the Interagency Council of Statistical Policy (ICSP) an annual report of SAP activities that addresses performance, provides recommendations, and identifies opportunities to improve the efficiency of the SAP.

Key accomplishments include:

- In the first year of operations of the new SAP portal, from December 8, 2022, when the SAP portal began accepting applications, to December 8, 2023, 529 confidential data access applications were submitted through the SAP portal. The average time for agencies to approve an application was 55 calendar days (within the 84 days permitted per M-23-04); the average time to reject was 111 days (exceeding the 84 days permitted).<sup>1</sup>
- Established membership for three SAP-GB working groups (work is underway).
- Provided feedback to the ICSP on SAP-related recommendations from the [Advisory Committee on Data for Evidence Building \(ACDEB\) Year 2 Report](#).
- Drafted a Communications Plan to inform an overall strategy for stakeholder engagement and messaging about the SAP.
- Developed new processes including those for annual dataset metadata updates, change requests to the SAP portal, and application review extension requests.
- Developed nine new features for the SAP portal to improve the user experience and improve public transparency through online metrics.
- Drafted and released new user materials including two guides: These include two guides, "Searching the SAP Data Catalog" and "Five Things to Know Before Applying," and one video, "What to Expect as an SAP Reviewer." These are available on the [SAP Learning Resources page](#).
- Administered an SAP Agency Resource Needs assessment, from all 16 RSAUs participating in the SAP, to gather information on agencies' resource challenges and anticipated resource needs as they relate to the SAP.

Key recommendations for future actions and planning include:

- Assess feasibility for streamlining security credentialing across Federal agencies with 14 specific recommendations to reduce duplication in data security training, develop a secure means to share researcher credentials across agencies, and potentially establish standard credentialing levels to be used across Federal agencies.

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<sup>1</sup> The average time to reject an application was greatly impacted by one agency that experienced challenges with the SAP transition. Average review times are explained in more detail within the report.

- Establish criteria for additional agencies, beyond the 16 RSAUs required to use the SAP per 44 USC §3583<sup>2</sup>, to be approved to join the SAP.
- Enhance SAP portal efficiency via projects to inform a potential new acquisition for the technical development and operation of the SAP portal.
- Convert the SAP portal to a “.gov” domain and conduct comprehensive site rebranding.
- Leverage intersections with other Federal shared services, such as the National Secure Data Service (NSDS) Demonstration project and the Federal Statistical Research Data Center (FSRDC) program.

## Background

The [Foundations for Evidence-Based Policymaking Act of 2018](#) (also referred to as the Evidence Act) required a Standard Application Process (SAP) be established for requests for confidential data from Federal agencies covered under the Confidential Protection and Statistical Efficiency Act (CIPSEA). Section 3583 of the Evidence Act calls for a common application, standard review criteria, timeframes for prompt determinations, reporting metrics for transparency, an appeals process for negative determinations, and outreach to stakeholder communities. Following the passage of the legislation, OMB published a policy memorandum entitled [Establishment of Standard Application Process Requirements on Recognized Statistical Agencies or Units \(M-23-04\)](#) in December 2022, which outlines process requirements for agencies implementing the SAP<sup>3</sup>. Concurrent with the policy, the [SAP portal](#) was launched, and the SAP Governance Board, under the purview of the ICSP, was convened.

Working within the requirements and guiding principles of both the legislation and policy, the SAP-GB, including its working groups, seek to further enhance the SAP portal, meet the needs of stakeholders, and ensure all requirements of both the legislation and policy continue to be met as the SAP evolves. This annual report provides an overview of SAP activities and accomplishments for the Calendar Year 2023.

The SAP is an interagency effort led by OMB and the ICSP to implement a shared service across the Federal statistical system, per the Evidence Act. The Chief Statistician of the United States (CSOTUS) provides key leadership for the SAP, as an OMB senior executive who serves as the chair of the ICSP and co-chair of the SAP-GB. The SAP-GB, as required by M-23-04, provides executive oversight and guidance of the SAP, while its interagency working groups are tasked with executing technical, communications, budget, and policy-relevant aspects of the SAP. A project management office (PMO), the National Center for Science and Engineering Statistics, provides project integration and support across the effort.

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<sup>2</sup> Title III of the Foundations for Evidence-Based Policymaking Act of 2018 ([44 USC §3583](#)) established the SAP and mandated that the 16 RSAUs implement the SAP.

<sup>3</sup> Per 44 USC §3583, the 16 RSAUs are required to implement the SAP. As of January 2024, these agencies are: Bureau of Economic Analysis (Department of Commerce); Bureau of Justice Statistics (Department of Justice); Bureau of Labor Statistics (Department of Labor); Bureau of Transportation Statistics (Department of Transportation); Census Bureau (Department of Commerce); Economic Research Service (Department of Agriculture); Energy Information Administration (Department of Energy); National Agricultural Statistics Service (Department of Agriculture); National Center for Education Statistics (Department of Education); National Center for Health Statistics (Department of Health and Human Services); National Center for Science and Engineering Statistics (National Science Foundation); Office of Research, Evaluation, and Statistics (Social Security Administration); Statistics of Income Division (Income Revenue Service); Microeconomic Surveys Unit (Federal Reserve Board); Center for Behavioral Health Statistics and Quality (Department of Health and Human Services); National Animal Health Monitoring System (Department of Agriculture)

The SAP portal was launched and began accepting applications on December 8, 2022. The SAP portal is comprised of the SAP Data Catalog (a searchable metadata inventory of confidential Federal data assets), the SAP application (a common application form for requesting access to this confidential data), and the SAP reviewer’s dashboard (which allows agency reviewers to adjudicate applications based on the common review criteria outlined in the SAP policy). The main purpose of the SAP portal is to enhance, streamline, and standardize requests for public access to confidential data for the purposes of evidence building, thereby reducing the burden of applying for confidential data, which previously involved separate processes with each of the 16 RSAUs.

The overall governance and working group structure of the SAP provides the leadership and expertise necessary to maintain and enhance the SAP portal and processes. Figure 1 shows the governance structure for the SAP.

The **Interagency Council on Statistical Policy (ICSP)** is the overarching body providing oversight for the SAP. The ICSP, chaired by the Chief Statistician of the United States, supports implementation of the Federal statistical system's vision to operate as a seamless system, working together to provide strategic vision and robust implementation in support of the U.S. Federal statistical system's critical longstanding — and expanding — role for supporting evidence-based decision-making.

The **SAP Governance Board (SAP-GB)** provides executive level guidance and leadership in SAP implementation, including providing vision, executive decision-making, and recommending policy updates to OMB.

The **Technical Working Group (TWG)** consists of all 16 RSAUs and operationalizes the legislative and policy requirements of the SAP for implementation into the SAP portal.

The **Communications Working Group (CWG)** focuses on legislatively required stakeholder engagement, including communications, gathering of stakeholder feedback, and ensuring outreach and user materials are available.

The **Budget and Policy Working Group (BPWG)** identifies budget needs and formulates budget strategy to ensure agencies can meet legislative and policy requirements, as well as provides policy recommendations as requested by the SAP-GB.

The **SAP Project Management Office (PMO)**, led by the National Center for Science and Engineering Statistics, implements, maintains, and supports the SAP as directed by the ICSP, OMB, and the SAP-GB.

The **Inter-University Consortium for Social and Political Research (ICPSR), University of Michigan**, is the current contractor developing and supporting the online SAP portal.

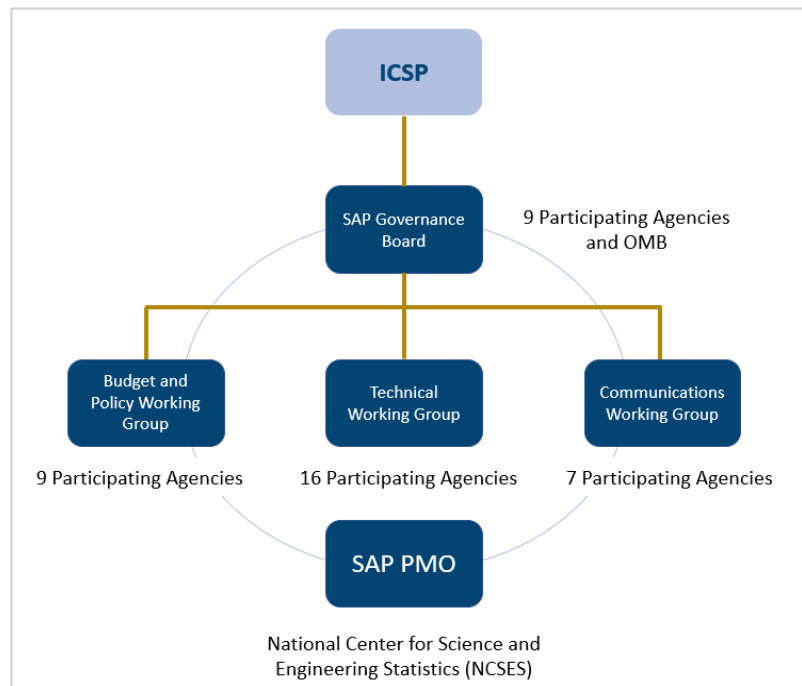


Figure 1: SAP governance structure

## Streamlining Credentialing Requirements Across Federal Statistical Agencies and Units

### Background

The Evidence Act called for a common application process for all requests for Federal confidential data. This process begins by applicants discovering data through the SAP Data Catalog, submitting an application via the SAP portal, and tracking the application's progress as the agency (or agencies) complete their review using the common review criteria outlined in the SAP policy (M-23-04). The SAP process concludes when an agency renders a determination and when any appeals are exhausted. In the event of a positive determination (i.e., an approved application), the data-owning agency (or agencies) contact the applicant to provide instructions on the agency's security requirements, which must be completed to gain access to the confidential data. The completion and submission of the agency's security requirements currently take place outside of the SAP portal and are handled on an individual basis by each agency. Each agency has their own security requirements and clearance processes, and agencies do not currently offer reciprocity for security training or requirements completed at another agency. This results in duplication that is a burden to both applicants and agencies.

Section 4.2 of the SAP policy (M-23-04) established four authorization levels for applicant credentialing to access confidential statistical data and broad review criteria for each level. It also called for sharing of applicant credentialing information across agencies, to the extent feasible, to streamline the credentialing process for applicants. As noted above, M-23-04 directed a report to the OMB Director outlining recommendations to further facilitate this streamlining.

The ability to share credentialing information and requirements will significantly reduce duplication and burden for applicants and agencies. The benefit to applicants is a reduced need to take multiple trainings with highly similar content and to provide the same information in multiple formats, and potentially the elimination of the need for multiple credentials. For agencies, efficiencies can be gained through sharing of information and credentialing reciprocity, reducing burden on agencies in collecting information and processing applicant credentials, which can be both expensive and time consuming.

The recommendations below outline steps to facilitate the sharing of an SAP applicant's completed credential requirements across statistical agencies and units. These recommendations were developed by the Credentialing sub-working group of the SAP Budget and Policy Working Group (BPWG) and approved by the SAP Governance Board. The recommendations are grouped into four themes: 1) data security and related training, 2) information sharing across agencies, 3) developing a researcher passport, and 4) implementation. The recommendations include activities to inform strategies and next steps for exploring each of these issues to develop future policy surrounding credentialing across SAP participating agencies. At the end of this section, potential challenges and issues are discussed.

### Overview

The 14 recommendations below, outlined within 4 themes, represent a major overhaul of the information sharing and credentialing process. Implementing the recommendations will require buy-in, support, and resources beyond the SAP Governance Board, its interagency working groups, and the RSAUs.

Agencies may be reluctant to share information or adjust their current credentialing processes. In many cases, information sharing and credentialing is handled at the Department level, meaning agencies may be limited in what they can share or change themselves. Legal and policy regulations that govern information sharing and credentialing (both at the agency and Department level) must be identified and

addressed. Additionally, significant resources will be needed to conduct assessments of the current information sharing and credentialing landscape.

While streamlining and standardizing the credentialing process will result in large-scale efficiencies and support a shared services model, robust support will be needed from agencies and their Departments, ICSP, OMB, and additional agencies such as the Office of Personnel Management. Streamlining credentialing will not be achieved without the concerted effort and buy-in of agencies across government. The recommendations provided will also require further exploration and represent the initial step in conceptualizing a potential path to streamlining credentialing processes. The table below provides an overview of the recommendations and their associated level of effort.

Theme	Recommendation	Level of Effort
<b>Data Security and Related Training</b>	1. Identify common and agency-specific data security training requirements	The level of effort is <b>medium</b> . Resources will be needed to conduct information gathering, develop common training, and develop centralized tracking.
	2. Investigate agency-specific requirements identified in Recommendation #1 to identify any overlap	
	3. Establish common cross-agency training requirements	
	4. Develop a common training tracking system to record and track training status	
<b>Information Sharing Across Agencies</b>	5. Identify credentialing information currently collected by SAP participating agencies	The level of effort is <b>medium</b> . Resources needed to conduct information gathering and to develop a centralized system for sharing information.
	6. Determine what credentialing information can be shared	
	7. Develop a system for securely entering, storing, and sharing researcher information	
<b>Researcher Passport</b>	8. Gather information about agencies' current credentialing processes	The level of effort is <b>high</b> . Requires very high level of cross-agency and Department cooperation and buy-in, development of centralized system to share highly sensitive information.
	9. Establish cross-agency "standard" credentialing levels	
	10. Review examples of credentialing processes to inform the creation of a researcher passport	
<b>Implementation</b>	11. Establish an interagency working group to address recommendations 1-10	The level of effort is <b>low to medium</b> . Requires interagency working group be established to determine implementation steps and resource needs.
	12. Determine and obtain resources needed to conduct the as-is assessment and information gathering about agencies' information collection and credentialing processes	
	13. Engage with the ICSP and OMB to determine governance for a common credentialing process, researcher passport, and/or systems used to collect and store information.	
	14. Determine resource needs and means to source support for system development and development of common training(s).	



## Data Security and Related Training

**Goal:** This theme explores the extent to which one or more common trainings can be developed that will satisfy training requirements for applicants who access confidential data.

**Issue:** To meet requirements under CIPSEA and other data confidentiality statutes, RSAUs require some form of data security training for individuals who access confidential data. This training includes common elements, such as review of confidentiality statutes and penalties for statutory violations. Additional training is sometimes required, such as records management training. In the current environment, an applicant is required to take each agency's data security training, and potentially other trainings, if accessing data. As a result, applicants may need to take multiple trainings with highly similar content if requesting data across different agencies. This results in an increased burden on applicants and duplicative information being presented.

**Recommendation #1:** Identify applicant data security training requirements that are common across agencies as well as agency-specific training requirements, such as those that differ based on legal statutes or agency policies. Outreach to the Office of Personnel Management, Chief Data Officers' Council, agency training staff, Federal Privacy Council, the Chief Information Security Officer Council, and other appropriate peer councils should be included to understand training requirements as well as current methods for sharing training information and potential barriers.

**Recommendation #2:** Investigate additional required training across agencies to identify opportunities for further streamlining. The agency-specific requirements identified in Recommendation #1 should be analyzed to identify any overlapping content. These additional trainings could include records management training or data handling trainings that are supplemental to data security training and that may be duplicative across Federal agencies.

**Recommendation #3:** Using the information gathered through Recommendations #1 and #2, establish common training requirements to be adopted across agencies. This could be a comprehensive training course or a core module with additional agency-specific modules. These training requirements would be common to all SAP participating agencies.

**Recommendation #4:** Develop a common training tracking system to record and track training status for SAP applicants approved to use confidential data. This system would be accessible to all SAP agencies and would contain information on applicants and training requirements met (and if core training with additional agency-specific modules is implemented, modules required based on data access). This system could be added to the existing SAP portal or an entirely separate platform.

## Information Sharing across Agencies

**Goal:** This theme explores opportunities for sharing information on applicant credentials across SAP agencies.

**Issue:** RSAUs require that applicants for confidential data obtain an agency credential prior to data access. This credential can vary widely by agency, with some requiring a licensing agreement, others requiring CIPSEA agent status, while others may require a more extensive background check. It is currently rare for agencies to share information about applicant credentials, resulting in duplicative information being collected from applicants.

**Recommendation #5:** Create an inventory of credentialing information that is collected across SAP participating agencies to determine what information is potentially available for sharing. Potential credentialing information includes researcher names, addresses, academic affiliation, citizenship information, residency information (required by agencies that use Defense Counterintelligence and



Security Agency, or DCSA, to conduct background investigations), letters of agreement, responsible principal investigators and individuals working on projects, and special agreement checks on researchers who visit onsite (minimal criminal history check based on fingerprints).

**Recommendation #6:** Determine what credentialing information can be shared, given agencies' security requirements and privacy requirements. Issues to consider include whether information can be centrally collected using a single Privacy Act statement and central OMB information collection clearance, shared across agencies.

**Recommendation #7:** Develop a system for securely entering, storing, and sharing researcher information. This system could be a stand-alone system or added to the existing SAP portal. A relevant example is [www.USAJOBS.gov](http://www.USAJOBS.gov). This is a centralized system that collects basic applicant information which all government agencies can access. Systems should be examined to see if an existing platform can be leveraged or if lessons can be learned from existing systems in establishing a credentialing system.

### Researcher Passport

**Goal:** This theme explores whether cross-agency "standard" credentials can be established and accepted by agencies in lieu of credentials currently used by individual agencies.

**Issue:** While sharing credentialing information would be a significant step forward in streamlining credentialing, the establishment of a researcher passport would provide the ultimate efficiency gains and support the move toward a unified Federal data ecosystem. The SAP policy established four authorization levels as four distinct trust levels for SAP applicants. While some agencies may fall within the same authorization level, they currently require a different credential. A standard set of credentials, potentially at the authorization levels identified within the SAP policy, could be established and shared across agencies. For example, a Level 4 authorization requires positive identification of the applicant, training, an agreement, and a background investigation. A single credential at an authorization Level 4, that includes these elements, could be created and accepted by all agencies that require that level. This would eliminate the need for multiple credentials at the same authorization level. Agencies below the authorization Level 4 could also potentially accept this credential as it would exceed their requirements.

**Recommendation #8:** Gather information about agencies' credentialing processes to understand the as-is state with credentialing levels in SAP participating agencies. This effort should include information on statistical agency statutes as well as parent agency policies and requirements. This information gathering could be achieved at the same time as the compilation of credentialing information collected by agencies. This will provide the needed background for Recommendation #9. Outreach to the Office of Personnel Management, Chief Data Officers' Council, and other appropriate peer councils should be included to understand credentialing requirements and any potential barriers and challenges to developing a shared credential.

**Recommendation #9:** Using information gathered about credentialing, establish cross-agency "standard" credentialing levels that align with the authorization levels in the SAP policy. These credentialing levels should take into account legal requirements and any Department-wide policies that could significantly impact whether agencies will be able to accept a common credential.

**Recommendation #10:** Utilize existing examples of credentialing processes, such as within Federal Contracting Officer Representatives (COR) certification, to inform the creation of a researcher passport and the credentialing levels and requirements. Existing credentialing processes can provide a framework and lessons learned in developing credentialing levels for access to confidential data. Please see [Appendix 1](#) for examples of potential credentialing processes.

## Implementation

**Goal:** To develop a plan to address the above recommendations regarding training, sharing of information, and a researcher passport.

**Issue:** This theme explores a path forward in executing next steps for a streamlined approach to credentialing among SAP participating agencies.

**Recommendation #11:** Establish an interagency working group to address the recommendations for training, sharing of information, and a researcher passport. Membership in this working group should include ICSP member agency representatives who process security clearances and who have in-depth knowledge of security clearance and training processes, policies, and procedures.

**Recommendation #12:** Determine and obtain resources needed to conduct the as-is assessment and information gathering about applicant information collected by agencies and their credentialing processes.

**Recommendation #13:** Engage with the ICSP and OMB to determine governance for a common credentialing process, researcher passport, and/or systems used to collect and store information.

**Recommendation #14:** Determine resource needs and means to source support for system development and development of common training(s).

## Potential Challenges and Opportunities to Consider

The following is a list of challenges and potential opportunities when considering how to develop and implement streamlined credentialing requirements.

- **How can agency buy-in be achieved?** An interagency working group may be a helpful approach to cultivate buy-in, as it gives agencies the opportunity for direct input in the process to centralize and streamline training, but it may not be sufficient. It will be critical to have senior executive, ICSP, and OMB support to cultivate buy-in from agencies and foster comfort with sharing information, accepting information from other agencies, and potentially accepting a researcher passport. It is also important to engage with relevant areas within agencies and Departments who are most aware of the challenges of streamlining credentialing from previous efforts they have been involved in.
- **How should legal and policy considerations within agencies and across Departments be identified and addressed?** For example, what aspect of information-sharing is determined by RSAUs and what is determined by their parent agencies? To this end, participation with this effort at the Department-level should be sought to ensure that any obstacles to streamlining at the Department-level can be addressed.
- **How might the proposed Trust Regulation impact this effort?** The proposed Trust Regulation<sup>4</sup> would require parent agencies to support the missions of RSAUs and promote enhanced communication, coordination, and collaboration when an RSAU utilizes a parent agency's support services. If this requirement were to be finalized, how might the forthcoming regulation assist collaboration across RSAUs on credentialing, a key critical function in sharing data with external researchers and facilitating evidence building, in cases where parent agencies support is necessary to adopt a streamlined process? Shared services solutions may also be encouraged with the proposed Trust Regulation, which this effort would directly support.

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<sup>4</sup> The forthcoming Trust Regulation is an OMB's proposed regulation to implement one regulatory requirement within Title III of the Evidence Act, also known as the Confidential Information Protection and Statistical Efficiency Act of 2018 (CIPSEA 2018).

- How might the forthcoming Expanding Secure Access Regulation, required under 44 USC § 3582, support agencies in accepting credentials approved by other agencies?** Standardized levels of accessibility for datasets as required in this future regulation could inform efforts to streamline credentialing levels. In addition, requirements to make the process for data access transparent support standardized credentialing. Standard credentials (and standard requirements for those credentials) align with increased transparency.
- How could streamlined credentialing support the overall Federal data ecosystem, including the SAP, Federal Statistical Research Data Centers (FSRDCs), and a potential future National Secure Data Service?** The SAP represents a key step in developing shared services among Federal statistical agencies and units. As the Federal statistical system moves towards more of a shared services model, as through the FSRDCs and a potential NSDS, shared credentials, processes, and systems would be a significant step towards increasing transparency, increasing efficiencies, and reducing burden among data users and agencies. Shared credentials would represent an important step to achieving a seamless Federal statistical system.

### SAP Portal Metrics

In its first year, the SAP Data Catalog includes metadata from 13 RSAUs, with over 1,400 datasets available. The SAP-GB is working with three agencies (EIA, NAHMS, and ORES<sup>5</sup>) to ensure their available data is listed in the SAP Data Catalog.

In the first year of operation, 529 applications were received through the SAP portal. As of December 8, 2023, 272 applications were awaiting a final determination (either under review with an agency or being revised by applicants). Final determinations were rendered on 257 applications, of which 205 were approved and 52 were not approved. This yields an 80% approval rate for 2023 (Figure 2).

Figure 3 shows a breakdown of applications received by each agency.<sup>6</sup>

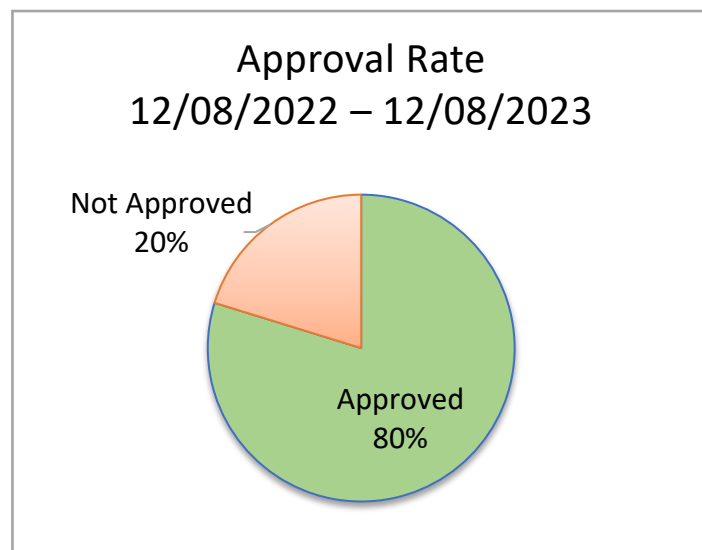


Figure 2: Approval and non-approval rates on applications received from 12/08/2022 - 12/08/2023

<sup>5</sup> EIA - Energy Information Administration; NAHMS - National Animal Health Monitoring System; ORES - Office of Research, Evaluation, and Statistics

<sup>6</sup> BEA - Bureau of Economic Analysis; BJS - Bureau of Justice Statistics; BLS - Bureau of Labor Statistics; BTS - Bureau of Transportation Statistics; CBHSQ - Center for Behavioral Health Statistics and Quality; ERS - Economic Research Service; FRB - Microeconomics Survey Unit, Federal Reserve Board; NASS - National Agricultural Statistics Service; NCES - National Center for Educational Statistics; NCHS - National Center for Health Statistics; NCSES - National Center for Science and Engineering Statistics; SOI - Statistics of Income Division

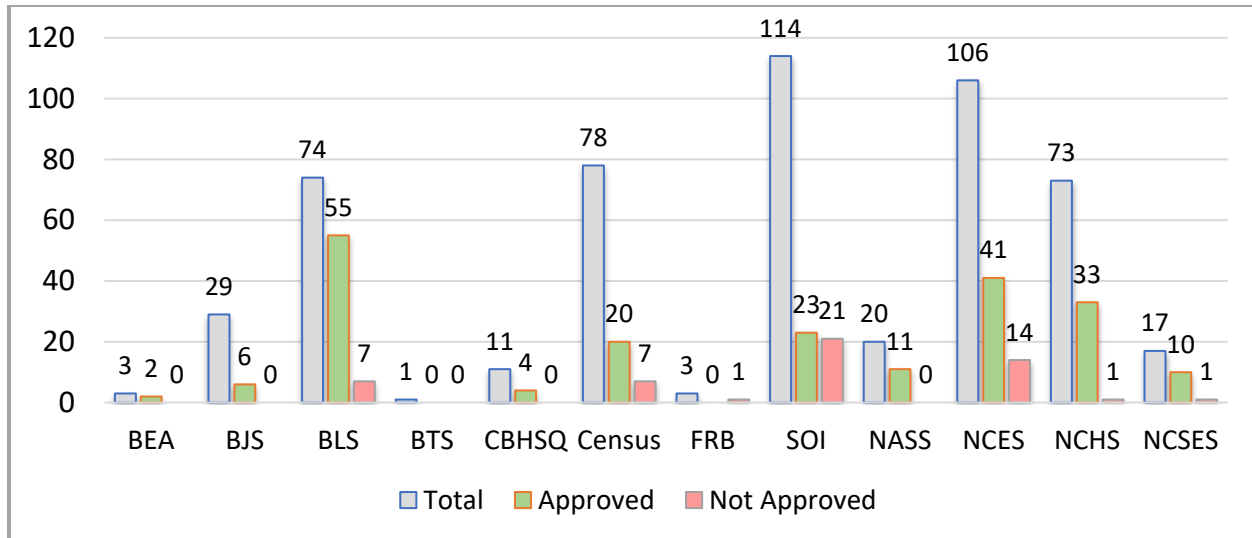


Figure 3: Applications received by agency from 12/08/2022 - 12/08/2023

Across agencies, the average time to review applications and render a final decision<sup>7</sup> was as follows:

- Average time for approved projects: 55 calendar days
- Average time for not approved projects: 111 calendar days<sup>8</sup>

See [Appendix 2](#) for a breakdown of average review duration by agency.

### SAP Activities and Accomplishments

Below are the principal activities undertaken during 2023 as well as the key accomplishments during this period. This section provides important context for the Goals and Opportunities outlined in the next section of this report.

**SAP-GB:** The SAP-GB serves as the executive steering committee for the SAP and operates as a subcommittee of the full ICSP. It serves dual roles: to represent the Federal agencies and units utilizing the SAP and to assist OMB in the oversight and coordination of the SAP. This includes identifying opportunities to improve the efficiency of the SAP, expanding use of the SAP by other agencies and organizations, approving a communications strategy, ensuring consistent engagement with stakeholders, and monitoring broad Federal statistical policy perspectives as they pertain to the SAP. The SAP-GB meets quarterly.

#### SAP-GB Accomplishments:

- Issued a call to the ICSP to staff agency membership on the three SAP working groups.
- Appointed Executive Champions for each SAP working group. The champions provide support and serve as day-to-day advisors and executive decision-makers for the working groups.

<sup>7</sup> The SAP policy (M-23-04) outlines a limit of 12 weeks (84 calendar days) for agencies to review applications requesting access to data owned by a single agency and 24 weeks (168 calendar days) for agencies to review applications requesting data owned by two or more agencies. Applications requesting data that requires approval from a party outside the SAP (e.g., a foundation or state agency) are exempt from review timelines. The review time clock is paused when the application is returned to applicants for revisions.

<sup>8</sup> The average time to reject an application was greatly impacted by one agency that experienced challenges with the SAP transition.

- Provided executive guidance on technical implementation and oversight on key metrics.
- Approved an annual schedule for agencies to review and update their metadata in the SAP Data Catalog.
- Monitored the performance of the SAP by tracking its progress on meeting application decision timing.
- Approved recommendations to streamline security requirements.
- Provided feedback to ICSP on SAP-related recommendations from the Advisory Committee on Data for Evidence Building (ACDEB) Year 2 Report. Feedback focused on the SAP-GB's level of agreement with the recommendation, its scope, and proposed immediate next steps.

**SAP PMO:** The PMO facilitates communication across agencies, provides central coordination for SAP working groups, and integrates project management processes and documentation across the SAP effort. The PMO is also responsible for the development, operation, and maintenance of the SAP portal in accordance with SAP policy (M-23-04). When development and maintenance of the SAP portal is done by a contractor, the PMO is responsible for selecting the contractor and monitoring contractor performance. As noted earlier in this report, ICPSR is the current technical contractor for the SAP portal.

To ensure an open and equitable vendor selection process, the PMO issued a Request for Solutions (RFS) through [America's DataHub Consortium](#) and awarded three short-term contracts<sup>9</sup> to develop prototypes for a new and enhanced SAP portal. The resulting prototypes will inform the PMO's selection of future vendors as well as enhancements, user needs, and notable gaps in existing functionality.

#### **SAP PMO Accomplishments:**

- Managed project integration across SAP working groups: provided draft charters for working group consideration, identified milestones, developed schedules, and ensured follow-up of action items.
- Coordinated user testing for the SAP portal: identified testers, handled communication, held testing office hours, collected, consolidated, and prioritized tester feedback.
- Coordinated interagency review of seven SAP portal technical designs.
- Outlined a process for agencies to submit application review extension requests.
- Developed a process and means for stakeholders to submit change requests to improve the SAP portal.
- Acted as a key liaison between customers and the SAP technical contractor to provide user support. From 12/08/2022 to 12/08/2023, 365 user support tickets were opened. As of 01/02/2024, 296 had been resolved.
- Held two webinars providing live demonstrations of the SAP application process and the SAP review process. The webinars were open to Federal staff and contractors; each webinar had over 50 attendees.

**Communications Working Group:** The SAP Communications Working Group is responsible for engaging with the SAP stakeholder community, which includes outreach and inviting input in accordance with the SAP Communications Plan. In addition, the working group develops user materials, informs stakeholders of key SAP portal and policy updates, reviews user feedback submitted via the SAP portal, and creates and implements cohesive branding for SAP communications.

Sub-working groups: User Materials; Push-Pull Communication

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<sup>9</sup> The SAP prototype contracts were awarded to Mathematica, RTI International, and Scientific Research Corporation.

### CWG Accomplishments:

- Developed draft SAP Communications Plan, which outlines key stakeholder groups and identifies strategies for engagement.
- Created user-friendly knowledge resources to support applicants and agency reviewers. These include two guides, “Searching the SAP Data Catalog” and “Five Things to Know Before Applying” and one video, “What to Expect as an SAP Reviewer.” These learning resources are available on the About SAP [Learning Resources page](#).
- Developed branded templates for presentations, documentation, newsletters, and infographics to ensure consistent messaging across all SAP communications.
- Drafted a plan and process to deliver a quarterly SAP newsletter. The first newsletter is set to be delivered in early 2024. Interested individuals may sign up for the newsletter on the [About SAP webpage](#) (there are currently over 1,700 subscribers).
- Updated the SAP portal [Frequently Asked Questions](#) (FAQs).

**Technical Working Group:** The TWG is responsible for providing oversight and review of technical operational activities of the SAP policy, which includes ensuring that the SAP portal fulfills the requirements of the Evidence Act. The group identifies technical requirements for new features and functionality, collaborates with the SAP PMO and the SAP technical contractor to resolve issues, verifies that the SAP Data Catalog is up to date, advises the PMO on feature prioritization, and participates in user acceptance testing of new features and functionality.

Sub-working groups: Application Windows; Application Amendments

### TWG Accomplishments:

- Drafted technical requirements for two new SAP portal features: application amendments and application windows.
- With the PMO, prioritized a list of nine technical features to be developed in calendar year 2023, based on resources available (see [Appendix 3](#)).
- Validated designs for seven new technical features.
- Participated in user testing for new features.
- Identified issues based on user feedback and communicated with the PMO and the technical contractor.
- Developed solutions to improve SAP processes (for example, streamlining review involving multiple agencies).

**Budget and Policy Working Group:** The BPWG is delegated with advising on the annual budget requirements of the SAP and consulting with OMB and the ICSP to identify funding needs; developing transparent criteria by which requests from non-statistical agencies or units to utilize the SAP to provide access to their data will be reviewed; and developing recommendations to facilitate the sharing of an applicant’s completed credentialing requirements across statistical agencies and units.

Sub-working groups: Credentialing; SAP Membership



## BPWG Accomplishments:

- Developed an SAP Agency Resource Needs assessment to gather information on agencies' resource challenges and anticipated resource needs as they relate to the SAP. Assessment responses were collected from all 16 RSAUs participating in the SAP.
- Developed recommendations for researcher credentialing to share an applicant's completed credentialing requirements across SAP participating agencies for SAP-GB consideration.
- Developed a set of draft membership criteria for new agencies to be approved to join the SAP to provide access to their data.

See [Appendix 4](#) for a list of current SAP Governance Board and SAP working group member agencies. See [Appendix 5](#) for a list of 2023 accomplishments alongside relevant policy, legislative, and other requirements

## Goals and Opportunities

### Goals

The list below shows the SAP-GB's planned improvements for Calendar Year 2024.

- 1. Continued technical enhancements to the SAP portal.**
  - a. These enhancements will focus on implementing the SAP policy requirements and improving the SAP user experience for applicants and for agency reviewers.
  - b. For a list of initial technical enhancements planned for 2024, see [Appendix 6](#).
- 2. Develop SAP budget recommendations.**
  - a. In 2024, the BPWG will develop budget recommendations based on the information received via the aforementioned assessment and on input from the SAP PMO.
  - b. The BPWG will submit their recommendations to the SAP-GB for consideration.
- 3. Establish criteria for additional agencies to be approved to join the SAP to provide access to their data as data owners.**
  - a. The BPWG plans to submit its draft criteria recommendations to the SAP-GB in 2024.
  - b. Following SAP-GB approval, the BPWG will develop a mechanism for agencies to request to join the SAP and will collaborate with the SAP-GB to establish a process for agency requests and SAP-GB review of these requests.
  - c. The SAP PMO, in consultation with the TWG, will establish a process for onboarding new agencies accepted through this mechanism to the SAP.
- 4. Continue communication activities and outreach to SAP portal users and prospective users.**

This will include implementing activities outlined in the SAP Communications Plan, including:

  - a. Finalize SAP Communications Plan for CY 2024
  - b. Webinars on how to search for data, how to apply for data, and other topics
  - c. Conference presentations and interactive information booths
  - d. Delivery of a quarterly SAP newsletter
  - e. Updates to the [About SAP](#) webpage and [www.statspolicy.gov](http://www.statspolicy.gov)
  - f. Development of new SAP learning resources
  - g. Proactive engagements with SAP portal users
- 5. Exploration of a new interagency working group to initiate implementation of the SAP-GB's credentialing recommendations.**
  - a. A fully dedicated interagency working group may be needed to enact these recommendations.



6. **Exploration of a potential pilot project to be executed through the National Secure Data Service (NSDS) Demonstration project.**
  - a. This project aims to examine SAP portal applications that were not approved or that would not be approved due to attempts to link data that cannot currently be combined (for example, attempting to link data owned by two agencies where there are no legal restrictions to combining the data but for which the agencies that do not have a data sharing agreement, such as a memorandum of understanding, that permits data sharing or for which there is no location in which data from both agencies can be combined and analyzed).
  - b. The project would aim to select one or two of these SAP portal applications to use as test cases for secure data linkage via an NSDS Demonstration project.
  - c. The PMO and TWG plan to develop a list of conditions that must be met to approve and conduct a multi-agency project and will monitor incoming submissions to identify a viable project(s).

### Opportunities

The list below outlines the SAP-GB's longer-term goals for improving the efficiency of the SAP in 2025 and beyond. Some of the goals below, such as leveraging intersections with other shared services, are ongoing and will require monitoring of the evolving data landscape. Others, as noted earlier in this report, require a substantive level of effort, resourcing, and time to achieve. This applies in particular to the recommendations to streamline security credentialing.

1. **Enhance SAP portal efficiency via projects to inform a potential new acquisition for further SAP portal development.**
  - The current contract for the SAP portal development will be recompeted in 2024. Potential selection of a new technical vendor will be informed by three SAP prototype contracts currently underway via [America's DataHub Consortium](#).
  - The period of performance for all SAP portal enhancement prototype contracts ends in October 2024.
2. **Convert the SAP portal to a ".gov" domain** and conduct comprehensive site rebranding.
  - The SAP PMO has developed plans to convert the SAP portal from a ".org" domain to a ".gov" domain. These plans involve a complete rehosting of the site and comprehensive rebranding of the website and all associated learning materials and documentation.
3. **Leverage intersections with other Federal shared services**, such as the NSDS Demonstration project and the Federal Statistical Research Data Center (FSRDC) program.
  - Identifying and promoting integration across three shared services within the data and evidence ecosystem (the SAP, the FSRDC program, and the potential future NSDS) is key to advancing the Federal evidence building infrastructure.
  - The Advisory Committee on Data for Evidence Building (ACDEB) [Year 2 Report](#) outlines a vision for how the SAP fits within a potential NSDS, serving as a front door for evidence building. As the SAP develops and expands, the SAP-GB will at the same time monitor the progression of the NSDS Demonstration, identifying opportunities to realize and promote the integration of these two shared services.
4. **Streamline security credentialing across Federal statistical agencies.** Standardized credentialing would significantly reduce the burden on researchers and minimize duplication of efforts across Federal agencies. Implementing standardized credentialing levels across the SAP is a major goal of the SAP-GB. The SAP-GB's recommendations to streamline credentialing are outlined at the beginning of this report.

## Conclusion

The SAP has reshaped the process to apply for access to Federal confidential data. It has increased transparency and standardization by providing a comprehensive listing of Federal data assets through the SAP Data Catalog, implementing a standard application form, and applying common review criteria to adjudicate applications. The SAP is built on the partnership and shared expertise of the Federal Statistical System and the individual hard work of agency employees. Collaboration and consensus across agencies are key to the ongoing success of the SAP.

As the SAP enters its second year of operation, the SAP-GB seeks to prioritize the continued development of the SAP. Critical areas to support include ensuring robust support for agencies (with specific SAP budget recommendations forthcoming in 2024), continued technical and communication activities, portal enhancements, and ongoing leadership of the SAP PMO.

The SAP-GB moreover anticipates the expansion of the SAP, as they develop criteria to approve other agencies to join the SAP as data owners and explore pathways to potential streamlining of security credentialing. The SAP-GB actively monitors the evolving data landscape to identify interdependencies with related efforts, such as the FSRDC network, the NSDS Demonstration Project, and the implementation of other Evidence Act requirements as well as additional Federal policies and regulations. The SAP-GB looks forward to and relies on the continued support of OMB and the ICSP as the SAP evolves and improves.

## List of Acronyms

Acronym	Term	Definition
BPWG	Budget and Policy Working Group	SAP interagency working group delegated to develop budget and policy recommendations to the SAP-GB.
CWG	Communications Working Group	SAP interagency working group that manages stakeholder outreach and communication.
ICSP	Interagency Council on Statistical Policy	Entity that supports implementation of the statistical system’s vision to operate as a seamless system to support evidence-based decision-making. ICSP advises the Office of Management and Budget (OMB) on SAP development and policy.
ICPSR	Inter-University Consortium of Political and Social Research	A consortium within the University of Michigan and the vendor contracted to develop Research Data Gov (the web portal implementation of the Standard Application Process).
SAP	Standard Application Process	A single process by which individuals may apply to access Federal restricted use data. Established in 44 USC §3583.
SAP-GB	SAP Governance Board	This board, composed of 9 voting members, serves as the executive steering committee of the SAP. It operates as a subcommittee of the ICSP.
SAP PMO	Standard Application Process – Project Management Office	Provides project management support, coordination, and strategic management across the SAP effort. NCSES is designated by OMB as the PMO.
RSAU	Recognized statistical agency or unit	OMB recognizes <a href="#">16 statistical agencies and units</a> under the Confidential Information Protection and Statistical Efficiency Act of 2018 (CIPSEA 2018)
TWG	Technical Working Group	SAP interagency working group delegated to manage technical implementation of the SAP.

## Appendix 1 – Examples for Security Credentialing

### Examples:

- Nursing:
  - <https://www.ncsbn.org/nursing-regulation/education/board-of-nursing-professional-licensure-requirements.page>
  - NCLEX-RN (National Council Licensure Examination Registered Nurse) or NCLEX-PN (National Council Licensure Examination Practical Nurse)
    - The hours to complete and the number of questions differ.
    - Education requirements differ as a prerequisite to being able to sit for the exam.
    - Roles that correspond with each type of exam differ.
    - NCLEX-PN passers are more limited in roles and responsibilities and are managed more closely.
- COR training:
  - All executive agencies certify CORs through Federal Acquisition Certification (FAC) COR training, except for DoD (which uses training through DAU).
  - FAC-COR has three levels of certification. They are recognized by all Federal civilian agencies.
  - FAC-COR certification is managed and awarded at the agency level (by a designated Acquisition Career Manager).
  - *Reciprocity with Other Certifications - Department of Defense (DoD)*: For Contracting Officer's Representative professionals coming from DoD with a valid, current COR certification, an equivalent FAC-COR certification may be granted at the same certification level, provided the FAC-COR experience and continuous learning requirements have been met and the agency ACM approves the certification. When applying for a FAC-COR, the individual is responsible for providing their agency ACM with the documentation supporting their DoD COR certification, experience, and continuous learning history.
  - Federal agencies may have unique certification requirements in addition to the FAC requirements.
  - Source: <https://www.fai.gov/certification/fac-cor/contracting-fac/fac-cor-certification-requirements>
  - <https://www.dau.edu/cop/cor>

## Appendix 2 – Review Duration by Agency

The SAP policy (M-23-04) outlines a limit of 12 weeks (84 calendar days) for agencies to review applications requesting access to data owned by a single agency and 24 weeks (168 calendar days) for agencies to review applications requesting data owned by two or more agencies. Applications requesting data that requires approval from a party outside the SAP (e.g., a foundation or state agency) are exempt from review timelines. The review time clock is paused when the application is returned to applicants for revisions.

Per M-23-04, agencies may request extensions of up to six weeks, to be granted by the SAP PMO. Additional extensions may be granted by the SAP-GB executive champion. Projects granted extensions are included in the average times below.

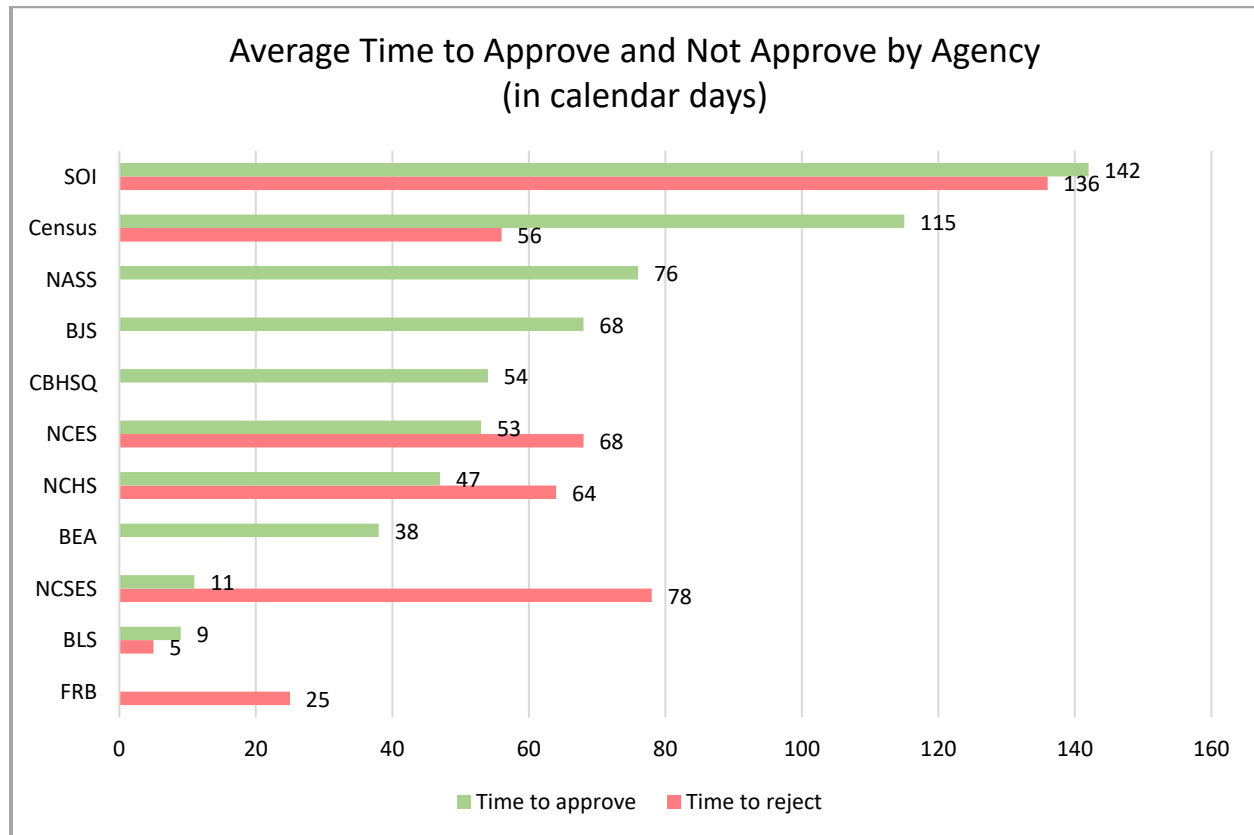


Figure 4: Average review duration (in calendar days) by agency.

### Notes:

1. SOI receives applications only once per year and requested an extension for all applications this year due to challenges experienced in transitioning to the SAP.
2. The Census Bureau has many data sources that require review and approval from non-SAP participating agencies, which allows for an unlimited review period per the policy.

## Appendix 3 – List of SAP Portal Features Developed in 2023

### SAP portal – List of Features Developed in 2023

Feature		Description	Rationale
1	Add/delete research team member	Allow applicants to add and remove research team members while an application is in progress.	Usability
2	Add/delete datasets	Allow applicants to add and remove requested datasets while an application is in progress.	Usability
3	Enhancements to Comment Feature	Allow reviewers and applicants the ability to view and download agency reviewer comments following the final adjudication. Allow reviewers and applicants the ability to see the comment history.	Usability
4	Versioning of required documents	Allow the technical contractor to streamline the process to update the application with specific documents required by some agencies.	Agency statue
5	Accessibility	Meet W3C and 508 standards to make the site accessible to more users.	508c
6	Review Time Clock	Make the time window for reviewing applications dynamic based on the type of application received: applications requesting access to data from one agency will have a 12-week review time period; applications requesting access to data from two or more agencies will have a 24-week review time period; and applications requesting access to data that requires approval from outside the Federal statistical system will have no review time limit.	SAP policy
7	Public reporting	Give the public access to application metrics and summary information regarding requests for data.	SAP policy
8	Application appeals	Allow applicants to file an appeal regarding an adverse application determination (i.e., non-approved project).	SAP policy
9	Application Auto-withdrawals	Automatically withdraw applications in “Draft” status if they are inactive for 6 months. Automatically withdraw applications in “Changes Needed” after 6 months.	SAP policy

## Appendix 4 – SAP Working Groups and Member Agencies

### SAP Governance Board

Agency or Department	Abbreviation
Bureau of Economic Analysis	BEA
Census Bureau	Census
Department of Education	ED
Department of Labor	DOL
Economic Research Service	ERS
Environmental Protection Agency	EPA
National Center for Science and Engineering Statistics	NCSES
Office of Management and Budget	OMB
Social Security Administration	SSA
Statistics of Income Division	SOI

### SAP Technical Working Group

Agency	Abbreviation
Bureau of Economic Analysis	BEA
Bureau of Justice Statistics	BJS
Bureau of Labor Statistics	BLS
Bureau of Transportation Statistics	BTS
Census Bureau	Census
Center for Behavioral Health Statistics and Quality	CBHSQ
Economic Research Service	ERS
Energy Information Administration	EIA
Microeconomics Survey Unit (Federal Reserve Board)	FRB
National Agricultural Statistics Service	NASS
National Animal Health Monitoring System	NAHMS
National Center for Educational Statistics	NCES
National Center for Health Statistics	NCHS
National Center for Science and Engineering Statistics	NCSES
Office of Research, Evaluation, and Statistics	ORES
Statistics of Income Division	SOI

### SAP Communications Working Group

Agency	Abbreviation
Bureau of Economic Analysis	BEA
Bureau of Justice Statistics	BJS
Bureau of Labor Statistics	BLS
Census Bureau	Census
Energy Information Administration	EIA
National Center for Science and Engineering Statistics	NCSES



Office of Research, Evaluation, and Statistics	ORES
Statistics of Income Division	SOI

### SAP Budget and Policy Working Group

Agency	Abbreviation
Bureau of Economic Analysis	BEA
Bureau of Justice Statistics	BJS
Bureau of Labor Statistics	BLS
Census Bureau	Census
Department of Homeland Security	DHS
Energy Information Administration	EIA
National Center for Education Statistics	NCES
National Center for Health Statistics	NCHS
National Center for Science and Engineering Statistics	NCSES
Statistics of Income Division	SOI

## Appendix 5 – 2023 Accomplishments

The following table provides an overview of key accomplishments in the calendar year 2023.

Group	Accomplishment	Rationale
SAP Governance Board	Issued a call to the ICSP to staff agency membership on the three SAP working groups.	SAP-GB Charter
	Appointed Executive Champions for each SAP working group. The champions provide support and serve as day-to-day advisors and executive decision-makers for the working groups.	SAP-GB Charter
	Provided executive guidance on technical implementation and oversight on key metrics.	SAP policy
	Approved an annual schedule for agencies to review and update their metadata in the SAP Data Catalog.	SAP policy
	Monitored the performance of the SAP by tracking its progress on meeting application decision timing.	SAP-GB Charter
	Approved recommendations to streamline security requirements.	SAP policy
	Provided feedback to ICSP on SAP-related recommendations from the Advisory Committee on Data for Evidence Building (ACDEB) <a href="#">Year 2 Report</a> .	ICSP request
SAP PMO	Managed project integration across SAP working groups: provided draft charters for working group consideration, identified milestones, developed schedules, and ensured follow-up of action items.	SAP policy
	Coordinated user testing for SAP portal: identified testers, handled communication, held testing office hours, collected, consolidated, and prioritized tester feedback.	SAP policy
	Coordinated interagency review of seven SAP portal technical designs.	SAP policy
	Outlined a process for agencies to submit application review extension requests.	SAP policy
	Developed a process and means for stakeholders to submit change requests to improve the SAP portal.	SAP policy
	Acted as a key liaison between customers and the SAP technical contractor to provide user support. From 12/08/2022 to 12/08/2023, 365 user support tickets were opened. As of 01/02/2024, 296 had been resolved.	SAP policy
	Held two webinars providing live demonstrations of the SAP application process and the SAP review process. The webinars were open to Federal staff and contractors; each webinar had over 50 attendees.	SAP policy
	Developed the SAP Communications Plan, which outlines key stakeholder groups and identifies strategies for engagement.	44 USC 3583
	Created user-friendly knowledge resources to support applicants and agency reviewers. These include two guides, "Searching the SAP Data Catalog" and "Five Things to Know Before Applying," and one video, "What to Expect as an SAP Reviewer." These	44 USC 3583

CWG	learning resources are available on the <a href="#">About SAP</a> informational webpage.	
	Developed branded templates for presentations, documentation, newsletters, and infographics to ensure consistent messaging across all SAP communications.	44 USC 3583
	Drafted a plan and process to deliver a quarterly SAP newsletter. The first newsletter is set to be delivered in early 2024. Interested individuals may sign up for the newsletter on the <a href="#">About SAP</a> webpage (there are currently over 1,700 subscribers).	44 USC 3583
	Updated the SAP portal <a href="#">Frequently Asked Questions</a> (FAQs).	44 USC 3583
TWG	Drafted technical requirements for two new SAP portal features: application amendments and application windows.	SAP policy
	With the PMO, prioritized a list of nine technical features to be developed in calendar year 2023 (see <a href="#">Appendix 3</a> ).	SAP portal usability
	Validated designs for seven new technical features.	SAP portal usability
	Participated in user testing for new features.	SAP portal usability
	Identified issues based on user feedback and communicated with the PMO and the technical contractor.	SAP portal usability
	Developed solutions to improve SAP processes (for example, streamlining review involving multiple agencies).	SAP portal usability
BPWG	Developed an SAP Agency Resource Needs assessment to gather information on agencies' resource challenges and anticipated resource needs as they relate to the SAP.	SAP-GB Charter
	Developed recommendations for researcher credentialing for SAP-GB consideration.	SAP policy
	Developed a set of membership criteria for new agencies to be approved to join the SAP.	SAP policy

## Appendix 6 – List of SAP Portal Features to be Developed in 2024

### SAP portal – List of Features to be Developed in 2024

The process to select the 2024 features is described below:

1. **SAP product backlog:** The PMO maintains the SAP product backlog, which includes potential future functionality based on SAP policy requirements, agency user feedback, and applicant user feedback. Agencies contribute to this list based on direct input from applicants and from agency reviewers. The PMO regularly reviews this list and notes significant pain points in usability based on agency input. This list currently has over 40 potential new features listed.
2. **Level of effort request:** The PMO requested level of effort estimates from the technical contractor (University of Michigan – ICPSR) for the top 17 features on the SAP product backlog.
3. **Feature prioritization:** The PMO and the Technical Working Group (TWG) held two rounds of discussion, culminating in a formal vote from SAP agencies (one vote per agency).

Below are features within scope for 2024, based on fiscal year 2024 budget allocation. They are listed in order of priority by TWG vote.

Feature		Description	User
1	Application Amendments	Applicants are able to make changes to applications post-approval. <b>SAP policy requirement</b>	Applicants
2	Search/Sort dashboard capabilities	Reviewers and applicants are able to search dashboards by application ID number, Principal Investigator (PI) name, and project title. This allows reviewers and applicants to locate specific applications and is a significant usability improvement for agencies with hundreds of applications. Reviewers and applicants are able to sort applications alphabetically by title, time last updated, create date, and application ID. Reviewers are also able to sort by number of review days left.	Reviewers and applicants
3	“Provisioned by” fields	Application provisioning question options for Years and States will be determined by dataset, from the metadata. Application provisioning question options for: (a) month, (b) other geographic time unit, (c) other time unit, (d) other unit besides time and geography will be determined (by dataset, from the metadata) by values available in those columns from metadata input.	Applicants
4	Ability to download reviewer comments	Applicants and reviewers are able to download agency reviewer comments. (Note: This is residual functionality from 2023, completing item #3, Enhancements to Comment Feature.)	Reviewers and applicants