Responsible Transparency

MCC’s Experience with Microdata Protection and Dissemination

Authors: Stephanie Burch, Heather Hanson, Jack Molyneaux, Jennifer Sturdy
Results-based Agency

- MCC is a USG foreign development agency created by the U.S. Congress in 2004, with bipartisan support.

- Focused mandate: Reduce poverty through economic growth.

- Every investment is managed and implemented by a local accountable entity – the Millennium Challenge Account (MCA).
Commitment to Transparency

• Provide public with needed accountability info:
  – What was spent;
  – What was bought; and
  – What outcomes were intended

• Provide data to enable scientific discovery

• Provide partner governments with information needed to understand and manage these investments

• Improve coordination across donors
Transparency & Results

Varying definitions

Reputational Risk

Align Incentives
Microdata

• Personally Identifiable Information (PII)
  – any information that can be used, on its own or in conjunction with other information that is linked or linkable to a specific individual, to determine the identity of an individual or otherwise locate or contact the individual

• Other sensitive data
  – Income, assets, health status
### Unique challenges

<table>
<thead>
<tr>
<th>Ethical</th>
<th>Legal</th>
<th>Practical</th>
</tr>
</thead>
</table>
| • Responsibility to protect respondents from harm  
• Informed consent process establishes promises of confidentiality | • U.S. privacy laws do not extend to data collection on foreign citizens  
• Potential limitations on guarantees of confidentiality | • Must establish trust for protection for participation and data quality  
• Agency needs to understand required resources |
Multiple, competing objectives

- Limit risk
- Maximize replicability
- Maximize usability
Action #1: Data Protection Principles

• Collection
  – Is PII data required for purpose of study?
  – All evaluators must submit research protocol to IRB
  – MCC Informed Consent template

• Storage
  – Protect access to those covered by informed consent
  – Lockable cabinets, secure file transfer, password protection
Action #2: Data Dissemination

• Data Documentation and Anonymization Guidelines

• World Bank and IHSN microdata catalog
  – Open source software

• Mechanism allows for secure, organized presentation of all data and associated documentation per evaluation
Action #3: Disclosure Review Board

• Oversee implementation of data protection principles for public release data

• Review anonymization package
  – Anonymization worksheet
  – Description of study
  – Informed consent
  – Questionnaire
  – Codebook

• Struggle with balancing objectives and release of data
Action #4:
Enable restricted-access

- When public use data requires erring on side of respondent protection over replicability and usability
- Create restricted-access file
  - Still minimizes ability to re-identify respondents
- MCC Restricted-Access form
  - Requests managed by MCC
Action #5: Staffing and resources

- MCC and MCA staff
  - M&E increased management of evaluators, data collection firms, documentation, and submission to DRB
  - Staff time for DRB

- Independent evaluators
  - Increased time and cost for IRB reviews and anonymization/presentation to DRB

- Technical consultants
  - For DRB, anonymization of data, management of data catalog
Lessons

Learn from others
• Statistical agencies
• Other research institutions; development agencies

Establish clear principles early
• IRB requirement, informed consent, data dissemination mechanism all inform data collection, storage, and dissemination

All data are not equal
• Be cautious with ambitious commitments
• Some data will not be public

Get the word out
• Need to find out if data is global public good
• Stakeholders need to know how to find and use
Remaining Challenges

• Data Ownership

• Long-term enforcement of privacy protections

• Legal limitations on MCC’s ability to protect privacy
Reducing Poverty Through Growth