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CHALLENGE CORPORATION

UNITED STATES OF AMERICA



Responsible Transparency

MCC's Experience with Microdata Protection and Dissemination

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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

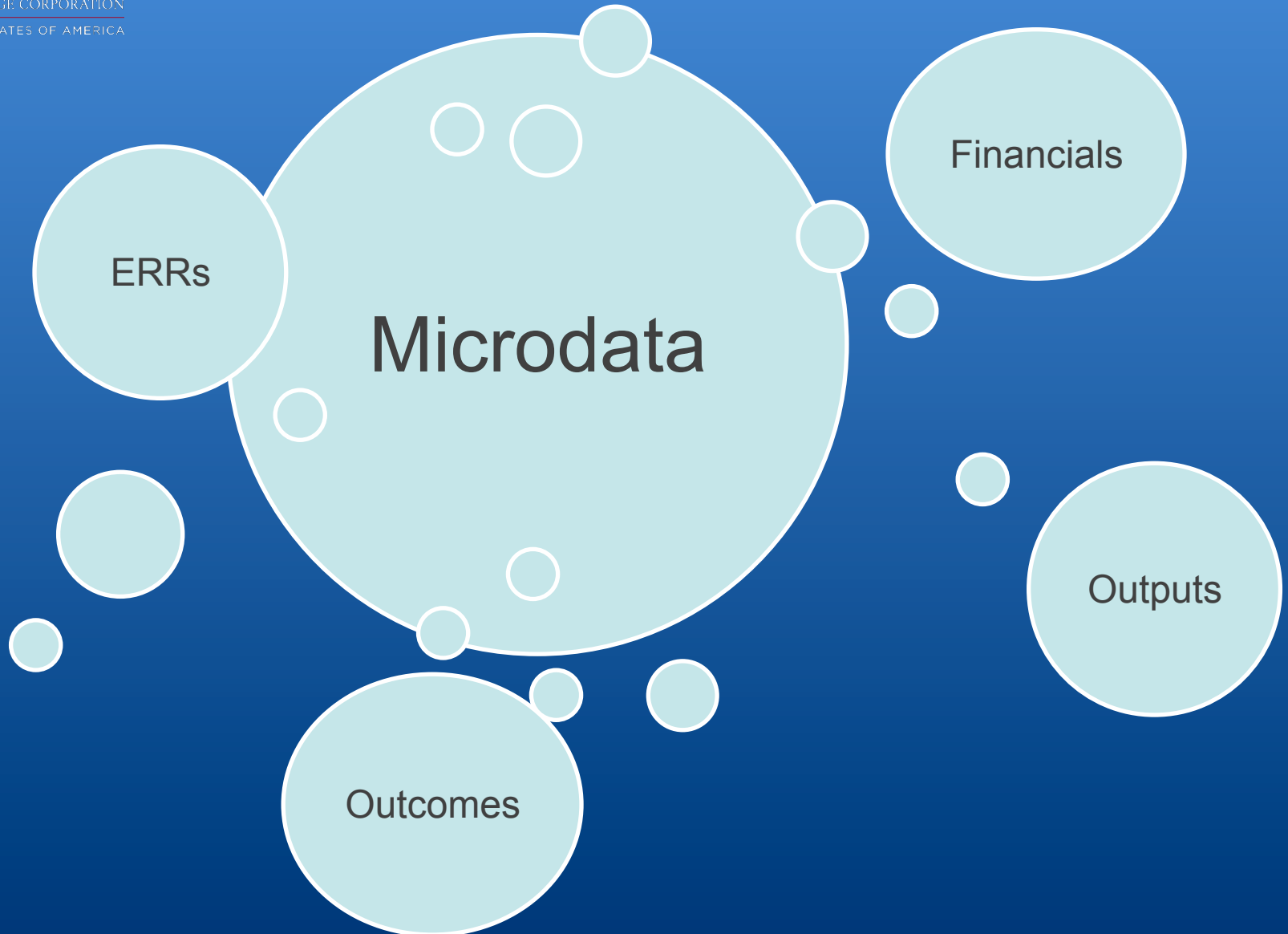
Transparency & Results





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Data vs. Microdata



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*



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Unique challenges

Ethical

- Responsibility to protect respondents from harm
- Informed consent process establishes promises of confidentiality

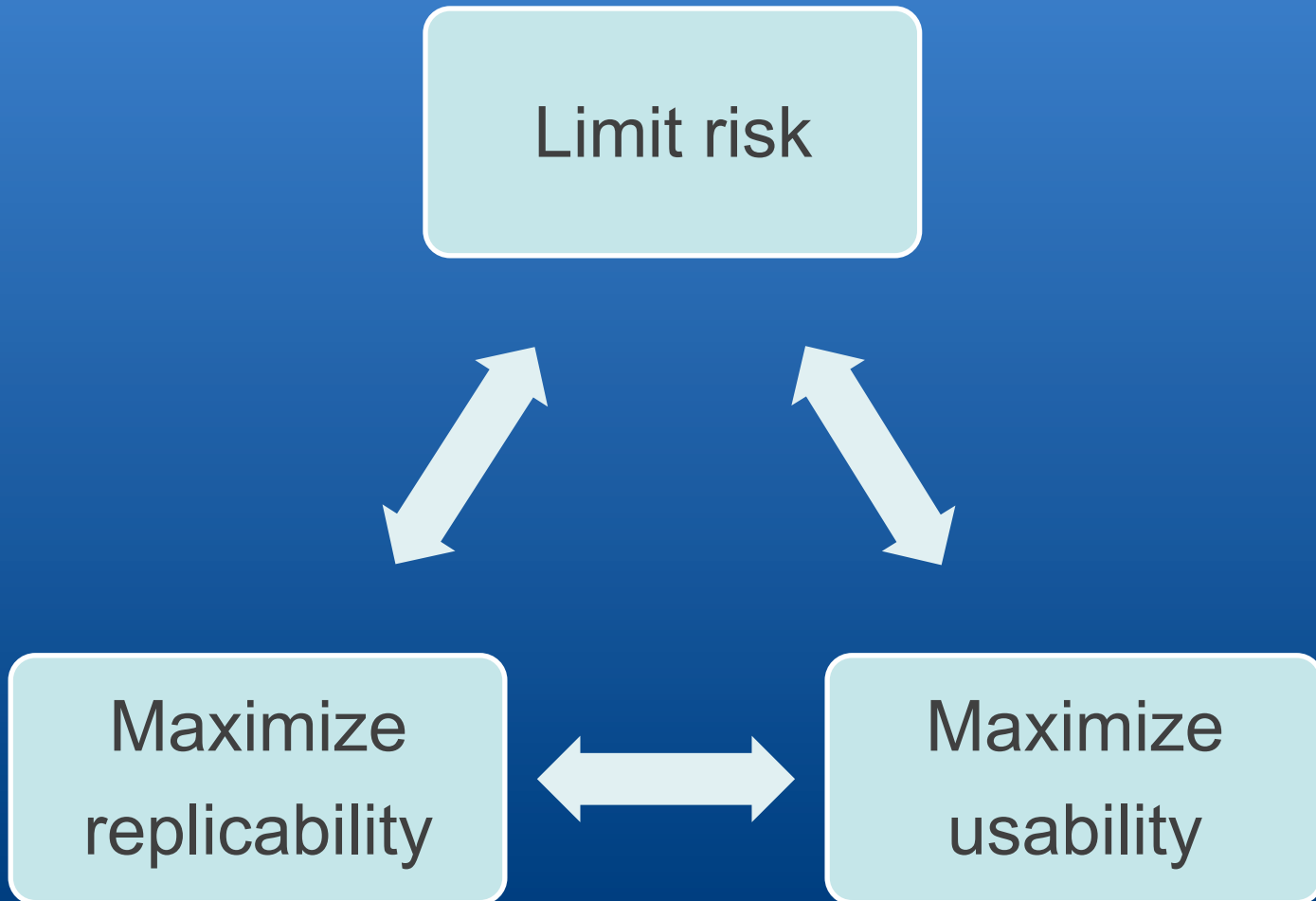
Legal

- U.S. privacy laws do not extend to data collection on foreign citizens
- Potential limitations on guarantees of confidentiality

Practical

- Must establish trust for protection for participation and data quality
- Agency needs to understand required resources

Multiple, competing objectives





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



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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