Data Stewardship Executive Policy Committee

DS-24: Research Proposal Review Process Policy

PURPOSE

This policy establishes the minimum requirements and criteria for the review of research project proposals at the Census Bureau. These reviews will help foster collaboration and creativity at the Census Bureau, foster awareness of new Census Bureau research, and reduce the possibility of duplicative research.

BACKGROUND

Research and innovation are crucial to the Census Bureau's ability to provide quality data on our dynamic society. To help ensure the success of such research and to ensure that research projects support the mission of the Census Bureau, every division/office¹ must have a process to review research proposals before the work begins. These research proposal review processes should not hamper innovation by imposing unnecessary burdens upon researchers nor steps so complicated or lengthy that they consume more effort or take longer to complete than does the research itself. In addition, much of the work at the Census Bureau is conducted in the course of producing data products by employing methods used for many years. The Census Bureau's mission of providing timely and accurate data would be impaired if all such projects required a research project proposal and a research review of the project proposal.

Most Census Bureau divisions already have formal review processes in place for research proposals that contain the minimum review elements outlined in this policy. Those divisions that do not are required to incorporate these minimum steps in to their review process.

SCOPE

This policy applies to all research proposals at the Census Bureau except for research projects conducted by senior research scientists and research projects at Research Data Centers. The policy identifies the types of project proposals that require reviews and lays out the elements of that review. Review of research project proposals by information owners is covered by another policy, *DS007: Information Security Management Program.* In addition, the Research Proposal Review Policy complements but does not alter guidelines already in place on research and research review in policies on the treatment of research participants, confidentiality of data, pretesting, other statistical quality standards, record linkage, and the publication of research results. It also does not alter the need to do research projects required under agreements with survey sponsors and provisions in the Census Bureau's Statistical

¹ Throughout the remainder of this document, the use of the word "division" and the title "division chief" encompass Census Bureau offices that are the equivalent of divisions.

Quality Standards on such research. The policy does not require divisions to alter their research proposal review processes if they already use the elements outlined in the policy.

POLICY

Determining Whether a Research Proposal Review Is Required

Census Bureau divisions are required to review research proposals for applied research projects geared towards changing Census Bureau processes and empirical research to understand gaps in Census Bureau data.

The line is often blurred between what proposed projects would be considered research and what projects would be considered part of a normal production improvement process. Using the following distinction, it is up to the Division Chief to determine whether a division-level review is required.

- Production projects tend to reflect long-standing, proven, and documented processes.
- Research projects tend to employ or test new or novel methodologies or examine how different data could be used to meet a measurement goal.

When a division-level research proposal review is required, the review must include the elements outlined below.

Elements of a Division-Level Research Proposal Review

- Criteria for Approval of a Research Proposal Every research proposal going through a Division's research proposal review process must meet the following three criteria to be approved.
 - The project must meet a business need of the Census Bureau, which includes how it aligns with the Census Bureau's strategic plan and the directorate's portfolio management.
 - The proposed research methods must be scientifically valid.
 - The proposed research must not put at risk the Census Bureau's mission and reputation.
- ☐ Steps in a Research Proposal Review
 - Division chiefs will assign two or more employees to review each research proposal or designate experts in their division to review all research proposals. At least one of those reviewers will be from outside the branch or survey center making the research proposal.
 - Division chiefs overseeing program areas that conduct few research projects can ask another division with greater research expertise to review a research proposal.
 - In addition, the division can meet the requirements of the policy by submitting the proposal to a directorate-wide or an interdivisional review body that approves of research proposals based on the criteria above. An example of such a body is the American Community Survey Research and Evaluation Working Group.

- The Division chief for the area proposing the research will decide whether all three criteria above have been met and therefore that research can proceed.
- Exceptions to the division's criteria must be approved by the associate director over the division doing the research.

Documenting Reviews of Research Proposals

Program areas must maintain a centralized list of research proposals that have been reviewed and those that have been approved and disapproved.

EFFECTIVE DATE

This policy is effective upon signature.

LEGAL AUTHORITIES

Title 13, U.S.C.

IMPLEMENTATION

Individual program areas have responsibility for implementing this policy. Program areas without a research review process for evaluating research proposals must create one with the minimum criteria outlined in the policy or ask another division with such a process in place to review their research proposals. Program areas whose research review processes already contain the minimum criteria should continue using their research review process. Program areas whose research review process does not contain all the minimum criteria should add those criteria to their process.

Implementation Guidelines

Evaluating Business Need for a Research Project

When considering the business need for the proposed research, divisions must consider not only how the project aligns with the goals in the Census Bureau's strategic plan and the directorate's portfolio management, but also the project's Title 13 benefits and how the project fits with legislative mandates, executive orders, and Office of Management and Budget (OMB) guidelines.

Evaluating Scientific Validity of a Proposed Research Project

Before a division chief approves a research project proposal, at least one person from outside the researcher's branch/survey center must evaluate the validity of the statistical methods proposed for the research. The reviewers should be staff with scientific expertise in the field and subject matter. When reviewing a project, the division chief will attest that such a review has been done.

Reviewers must evaluate the scientific validity of proposed research methods and how they conform to the standards of the research's field or discipline. Divisions that have not created their own set of criteria should do so in accordance with the standards for their field since

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statistics, economics, geography, mathematics, social and behavioral sciences, and demography do not employ the same sets of principles.

Research proposals need to have enough detail to help reviewers make a determination of scientific validity. For example, if a project involves matching records, the proposal would need to state that the linking will be at the record level.

Conducting a Risk Analysis of a Proposed Research Project

Division chiefs must consider the impact of the proposed research and the resulting information on the Census Bureau's reputation and mission. They must also consider the impact of the research on sensitive populations, akin to what is done in the checklist for Census Bureau acceptance of reimbursable projects.

RELATED DOCUMENTS

None.

POLICY OWNER

The Policy Coordination Office.

SIGNATURE

By Direction:

Date

Nancy A. Potok

Deputy Director and Chief Operating Officer

U.S. Census Bureau

| Summary Information | |
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