

**Office of Research, Evaluation, and Statistics (ORES) Annual Report to OMB  
on the Implementation of CIPSEA for Calendar Year 2009**  
May 4, 2010

**ORES Website**

Upon OMB approval of this report, it will be posted to the ORES website, “Research, Statistics, & Policy Analysis” at: <http://www.socialsecurity.gov/policy/>

**Use of the CIPSEA Confidentiality Pledge**

ORES did not conduct any surveys or collections of information during calendar year 2009 that applied to CIPSEA.

**Compliance with the CIPSEA Implementation Guidance – Section III (Affirmation of Compliance)**

1. **Physical and Information Systems Security:** Only authorized persons are permitted access to confidential information stored in SSA’s information systems. SSA’s Mainframe computer and ORES secure server sites in Baltimore, MD and Washington, DC are compliant with the CIPSEA provisions, the Federal Information Security Management Act (FISMA) requirements, the recommended National Institute of Standards and Technology (NIST) standards, the SSA Directive from the Chief Information Officer, and the SSA *Information Systems Security Handbook (ISSH)*, and the *ORES Guidelines for Removing Data from the SSA Work Site*.
2. **Confidentiality Training:** All individuals accessing data protected under CIPSEA are required to obtain security and suitability clearance and must be certified annually by completing an annual CIPSEA PowerPoint training. Non ORES staff/contractors/grantees, and other Federal agency employees must also complete, date/sign the CIPSEA Agent Agreement.
3. **Record Keeping:** ORES maintains a spreadsheet that identifies and tracks all individuals accessing confidential information protected under CIPSEA.
4. **Review of Information Prior to Data Dissemination:** ORES established a Disclosure Review Board (DRB) that reviews and approves Title 13 and other CIPSEA outputs and research reports for disclosure prior to public release. Interim work tabulations/statistical outputs are also reviewed by SSA disclosure specialists prior to the individual taking them off-site. ORES developed a *Rules for Disclosure Avoidance* document for data protected under CIPSEA that is compliant with *Working Papers 22*, and with SSA and IRS disclosure guidelines. SSA’s DRB and disclosure avoidance document were also approved by the Census Bureau’s DRB as compliant with Census Bureau disclosure policy and guidelines.

## Use of Agents Provision in CIPSEA

<b>Entity</b>	<b>Purpose</b>	<b>Number of Persons</b>	<b>Secure SSA Sites</b>
Congressional Budget Office/HRS Restricted Data Sets	Data Analysis	2	Secure servers at SSA secure sites in Baltimore, MD and Washington, DC
SSA's Office of Policy Net and Program Support	IT Support	4	Secure servers at SSA secure sites in Baltimore, MD and Washington, DC

**The Data Protected under CIPSEA During Calendar Year 2009.** The University of Michigan's Institute for Social Research (UM/ISR). Based on written consent, ORES provides UM/ISR SSA administrative data for respondents taking part in the UM/ISR Health and Retirement Study (HRS). For all verified respondent input records, ORES provides UM/ISR output files of benefits and earnings information, adds an anonymous, public use identifier to each record for linkage purposes, and deletes PII data elements from each record, including the SSN and name.

UM/ISR links their respondent data to these output files using the anonymous, public use identifier and creates "Restricted Data Sets." Subsequently, UM/ISR provides ORES a copy of the Restricted Data Sets which ORES agrees to use at a SSA secure site solely for research and statistical purposes.

### Compliance with the CIPSEA Implementation Guidance – Section IV (Designated CIPSEA Agents)

- 1. Contracts and Written Agreements:** The "quid pro quo" agreement between SSA and UM/ISR contains the appropriate provisions as shown in the Appendix of the CIPSEA Implementation Guidance.
- 2. Physical and Information Systems Security:** No CIPSEA data were used at off-site facilities during calendar year 2009.
- 3. Confidentiality Training:** All CIPSEA agents are certified annually by completing the PowerPoint training and by completing, signing/dating the CIPSEA Agent Agreement.
- 4. Record Keeping:** ORES maintains a spreadsheet that identifies and tracks all individuals, including CIPSEA agents, having authorized access to confidential information.