



National Science Foundation Standard Application Process Comments on Information Collection Request

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Prepared with the input and guidance of the ASA [Scientific and Public Affairs Advisory Committee](#)

The Scientific and Public Affairs Advisory Committee of the American Statistical Association (ASA) appreciates this opportunity to respond to the comment request from the Office of Information and Regulatory Affairs (OIRA) on the Standard Application Process. ([ICR Reference No: 202211-3145-002](#)). We commend the National Science Foundation's (NSF) development of a Standard Application Process (SAP) to streamline requests for access to confidential data. It is one step in supporting the [Foundations for Evidence-Based Policymaking Act of 2018 \(44 USC 3583\)](#).

Our comments concern three considerations posed in the NSF request for information:

1. Information collection requirements;
2. Ways to enhance the quality, use, and clarity of the information; and
3. Ways to minimize the burden of the collection of information.

Thank you again for allowing our organization to comment on the proposed process.

1. Information Collection Requirements

Item No. 36 in Appendix B states that, "Make sure there is sufficient time for the project to achieve its objectives and that the project's duration is not greater than the data provider's maximum duration. Requests for extensions beyond the proposed project duration may not be granted depending on the practices of the data providing agency." Access periods can be shorter or longer than a project's duration. For example, a long-term project exceeding the data

provider's maximum duration may only require access to confidential data for a shorter period of time. Such an application should qualify for consideration. Clarification would be helpful on the definition of "project."

2. Ways to Enhance the Quality, Use, and Clarity of the Information

Item No. 43 in Appendix B requires the applicant to list the data set(s) and corresponding variables of interest. The burden on the applicant along with the burden on the reviewer would be reduced if such components of the form were not written text, but rather organized as menus. For example, the applicant would select the agency, which would generate a list of data sets and then a list of variables from which the applicant would make selections corresponding to their project goals.

Furthermore, a link to an electronic concierge service in this section of the form would help the applicant find the most appropriate datasets for their projects. Integrating the data discovery and application process in this way would also help reduce applicant burden.

3. Ways to Minimize the Burden of the Collection of Information

Much of the information listed in Appendix A is available in the requestor's grant application for federally-funded projects. It would reduce the applicant burden if requestors could enter the grant number so that the Standard Application Process (SAP) could extract the relevant data from the original grant proposal.

Creating the SAP is vital in maintaining the quality of research in the US. Pursuant to the remarks in this comment, we hope the SAP will be rooted in the best user experience practices. Such an SAP would help streamline the process for both applicants and reviewers.