

# ADS Chapter 579 USAID Development Data

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# **ADS 579 - USAID Development Data**

#### 579.1 OVERVIEW

Effective Date: 10/01/2014

Data, and the information derived from data, are assets for USAID, its partners, the academic and scientific communities, and the public at large. The value of data used in strategic planning, design, implementation, monitoring, and evaluation of USAID's programs is enhanced when those data are made available throughout the Agency and to all other interested stakeholders, in accordance with proper protection and redaction allowable by law. This ADS chapter:

- Provides guidance for complying with the requirement in <u>USAID's</u>

  <u>Evaluation Policy</u> (January 2011) that, "All quantitative data collected by USAID or one of the Agency's contractors or [recipients] for the purposes of an evaluation must be uploaded and stored in a central database."
- Outlines USAID's approach to implementing <a href="Executive Order 13642"><u>Executive Order 13642</u></a>, <a href=""">"Making Open and Machine Readable the New Default for Government Information"</a> and the accompanying <a href="">OMB Open Data Policy, M-13-13</a>, <a href="">"Managing Information as an Asset"</a>, issued on May 9, 2013.
- (3) Addresses USAID's approach to managing data related to the February 22, 2013, White House Office of Science and Technology Policy

  Memorandum, "Increasing Access to the Results of Federally Funded Scientific Research."
- (4) Establishes the policy directives, required procedures, and roles and responsibilities governing the submission of Datasets (see **579.6**) to USAID's Development Data Library (DDL). The DDL is the Agency's repository of USAID-funded, machine readable data created or collected by the Agency and its implementing partners.
- Offers guidance for maintaining the DDL and for contributing to the Agency's knowledge-management efforts by:
  - Defining the requirements, standards, and roles and responsibilities governing data submission;
  - Identifying the types of data to be included in the DDL;
  - Detailing the procedures to be followed in making data available through the DDL; and

Supporting adherence to the <u>Open Government Initiative</u> and <u>OMB Open Data Policy</u> by making data funded by USAID available to the general public, where appropriate and allowable by law.

#### 579.2 PRIMARY RESPONSIBILITIES

Effective Date: 03/26/2020

- a. The **Performance Improvement Officer** or their designee, in consultation with the **Chief Information Officer**, reports quarterly to OMB on USAID's progress in meeting the objectives of the **Cross Agency Priority Goal on Open Government Data**.
- **b.** The **Management Operations Council (MOC)** provides Agency-wide leadership for initiatives and investments to reform USAID business systems and operations worldwide and to improve organizational performance, efficiency, and effectiveness.
- **c.** The **Information Governance Committee (InfoGov)** of the MOC, recommends standards and approaches for managing USAID's information and data and ensures compliance with U.S. Government mandates related to information and data.
- **d.** The **InfoGov Permanent Working Group (PWG)** recommends to, and takes direction from, InfoGov to:
  - (1) Implement USAID's approach to open data, including but not limited to <a href="Executive Order 13642"><u>Executive Order 13642</u></a>, "Making Open and Machine Readable the <a href="New Default for Government Information">New Default for Government Information</a>" and <a href="OMB M-13-13">OMB M-13-13</a>, "Open <a href="Data Policy Managing Information as an Asset."</a> This includes quarterly updates to the following, per OMB requirements:
    - Enterprise Data Inventory submitted to <u>OMB Max;</u>
    - Public Data Listing at www.usaid.gov/data;
    - Data Publication Process at www.usaid.gov/digitalstrategy;
    - Inventory Schedule at www.usaid.gov/digitalstrategy;
    - Customer Engagement Process at www.usaid.gov/digitalstrategy; and
    - Agency Points of Contact for data, submitted to OMB Max.
  - (2) Support implementation of USAID's approach to the White House Office of Science and Technology Policy's Memorandum on "Increasing Access to the Results of Federally Funded Scientific Research."

- (3) Develop and maintain a <u>Data Publication Process</u> to ensure that data identified for potential release under the Open Data mandate are vetted for:
  - Legality of release;
  - Removal of personally identifiable information;
  - Security considerations; and
  - Other principled exceptions to release as permitted by law.
- (4) Supervise the configuration and use of the DDL ensuring the proper tracking and documentation of Datasets in accordance with standards set by the MOC and InfoGov.
- (5) Conduct ongoing monitoring of data-related implementation activities and present data-driven reports to InfoGov on a regular basis.
- (6) Coordinate the appointment of Data Stewards in each USAID Operating Unit (OU) to support the work of the PWG and host meetings of Data Stewards on a regular basis to assign and coordinate taskings and trainings.
- (7) Recommend Datasets to InfoGov for public listing or release, upon completion of the **Data Publication Process**.
- (8) Field questions from Data Stewards and Agency staff regarding the Data Publication Process and assist with the clearance process as necessary. The PWG can be contacted at opendata@usaid.gov.

# e. The Bureau for Management, Office of the Chief Information Officer, IT Operations Division (M/CIO/IT)

- (1) Operates and maintains the DDL;
- (2) Responds to requests from the Permanent Working Group to make configuration changes to the DDL;
- (3) Assists with the creation and maintenance of websites relevant to the scope of the PWG;
- (4) Generates, as necessary, machine readable files for the DDL and for relevant data-sharing pages on the USAID website; and

- (5) Facilitates the creation of machine-to-machine connections between the DDL and relevant Agency information systems.
- f. Contracting Officers (COs) and Agreement Officers (AOs), including those delegated contract and grant-making authority in ADS 103, Delegations of Authority are responsible for incorporating clauses and provisions into contracts, grants, cooperative agreements (CAs), interagency agreements, and other implementing instruments to instruct implementing partners that they must submit Datasets created or collected with USAID funding to the DDL.
- **g. Operating Units** are responsible for including Datasets as deliverables in USAID awards, when writing statements of work or program descriptions. They must also:
  - (1) Appoint and maintain a Data Steward and their alternate, ensuring their participation in meetings, taskings, and trainings coordinated by the PWG; and
  - (2) Ensure that CORs, AORs, and Information System Owners:
    - a. Obtain all required clearances (see **579.3.2.5**), in consultation with other Operating Units that may be affected by the release of the data; and
    - b. Redact sensitive data in accordance with the guidance provided in this policy (see **579.3.2.3**).

Washington Operating Units, in consultation with the Office of the General Counsel (GC), and overseas Operating Units, in consultation with their Resident Legal Officer (RLO), must ensure that CORs, AORs and Information System Owners redact sensitive data, in coordination with other relevant Operating Units.

- h. Data Stewards in each USAID Operating Unit:
  - (1) Serve as subject matter experts for their Operating Unit on the Data Publication Process;
  - Provide guidance to CORs/AORs and others within their operating unit on identifying, cataloging, and clearing data for public release.
  - (3) Assist their Operating Unit with obtaining and documenting clearances for each identified Dataset;
  - (4) Providing reports to their leadership regarding open data efforts in their Operating Unit;

- (5) Take action on reminders from InfoGov or the PWG to identify Datasets managed by their Operating Unit that are candidates for inclusion in the DDL and for potential release to the public;
- (6) Provide feedback to the PWG regarding USAID's open data framework, including the guidance outlined in this policy;
- (7) Respond to PWG taskings and attend trainings and coordination meetings held by the PWG. Taskings may include, for example, guiding operating units on clearing data for release that were produced prior to the effective date of this policy.
- i. Contracting Officer Representatives (CORs) and Agreement Officer Representatives (AORs), in close coordination with implementing partners, activity managers, or other appropriate subject matter experts for each Dataset:
  - (1) During activity design (such as the design of contracts, grants, and cooperative agreements) and during the formulation of the annual work plan, identify and include Datasets as deliverables that would benefit the development community;
  - (2) Ensure that USAID-funded Datasets are submitted to USAID in accordance with the terms of the award under which they were created;
  - (3) Determine, in coordination with GC/RLO, as appropriate, whether Datasets or portions thereof are releasable per the terms of the award under which they were created;
  - (4) Respond to requests for information from Data Stewards;
  - (5) Inform Data Stewards of Datasets created or obtained under the award(s) to which the COR/AOR has been assigned;
  - (6) Redact (or ensure the redaction of) Datasets, in coordination with other relevant Operating Units, in accordance with principled exceptions to release (see **579.3.2.3**) and implementing redaction requirements from:
    - Office of Security / Counterterrorism and Information Security Division (SEC/CTIS);
    - Bureau for Management, Office of the Chief Information Officer, Information Assurance Division / Compliance and Risk Management Branch (M/CIO Privacy Office) (M/CIO/IA/CRM);
    - Bureau for Management, Office of Management Services, Information and Records Division (M/MS/IRD); and

- GC
- (7) Obtain and document (or ensure the obtainment and documentation of) required clearances in the DDL;
- (8) Designate, in consultation with GC/RLO, as appropriate, Dataset access levels (see **579.3.2.4**);
- j. Information System Owners. Given that USAID-funded data will also come directly from USAID information systems, USAID Information System Owners must also respond to requests for information from Data Stewards and inform their Data Steward of Datasets requiring inclusion in the DDL. In such instances, the Data Steward will take on the responsibilities and procedures outlined in this document for COR/AORs. Information System Owners are generally designated on form AID 545-9, USAID Information System Owner Letter of Acknowledgement, filed with M/CIO by the Operating Unit requesting the system. For more information on Information System Owners, see ADS 502, The USAID Records Management Program, ADS 508, The USAID Privacy Policy, and ADS 545, Information Systems Security.
- k. The Office of Security/Counterterrorism and Information Security Division (SEC/CTIS) reviews the content of each Dataset, focusing primarily on information which requires administrative controls or protection to prevent release to the public and/or other unauthorized disclosures (this includes Sensitive but Unclassified (SBU) information). This review is conducted in accordance with <a href="Executive Order 13556"><u>Executive Order 13556</u></a>, <a href=""""""">"Controlled Unclassified Information</a>."
- I. The Bureau for Management, Office of the Chief Information Officer, Information Assurance Division/Compliance and Risk Management Branch (M/CIO Privacy Office) (M/CIO/IA/CRM), as delegated by USAID's Senior Agency Official for Privacy, helps protect Personally Identifiable Information (PII) from unauthorized access or disclosure, and upon learning that a Dataset is a candidate for public release:
  - Requires the COR/AOR for the Dataset to complete an Open Data Privacy Analysis template (ODPA) (which can be found here: <a href="https://pages.usaid.gov/M/CIO/open-data-privacy-analysis-odpa">https://pages.usaid.gov/M/CIO/open-data-privacy-analysis-odpa</a>) to discover and document any information privacy issues with Datasets;
- m. The Bureau for Management, Office of Management Services, Information and Records Division (M/MS/IRD), as delegated by USAID's Chief Freedom of Information Act (FOIA) Officer, reviews the Dataset to identify sensitive information protectable from release by one of the six principled exceptions outlined in OMB Bulletin 12-01 "Guidance on Collection of U.S. Foreign

<u>Assistance Data.</u>" These principled exceptions coincide with several of the allowable FOIA exemptions under <u>5 U.S.C. 552(b)(1-9)</u>.

n. The Office of the General Counsel (GC) attorney will assist Data Stewards, CORs/AORs, and Operating Units with issues that arise regarding the release of Datasets, as needed. For specific legal questions on the release of Datasets, Washington Operating Units must contact the GC attorney who generally provides legal advice to that Operating Unit; overseas Operating Units must contact their RLO.

#### 579.3 POLICY DIRECTIVES AND REQUIRED PROCEDURES

# 579.3.1 Data Management Planning

Effective Date: 07/31/2020

USAID recognizes the importance of data management planning to ensure that data are managed well across a full data lifecycle, including collection, analysis, repository submission, and publication and re-use. Planning ensures that USAID staff and implementing partners follow data management best practices to produce high-quality, usable data assets and submit these assets to USAID as deliverables under the terms of awards.

Data Management Plans (DMPs) are tools that guide the identification of anticipated data assets and the outlining of tasks needed to manage these assets across a full data lifecycle. As a complement to Activity Monitoring, Evaluation, and Learning (MEL) Plans, USAID employs activity DMPs to enable USAID staff and implementing partners (IPs) to identify data assets that will be created and used in a USAID-funded activity. Activity DMPs also describe important data management tasks to ensure the use of data management best practices at each stage of a lifecycle. They ensure that data assets contribute to the Agency's evidence base and that implementing partners submit data assets designated as deliverables in accordance with conditions and guidelines in awards.

Washington OUs and Missions should balance the efforts of implementing partners and USAID to establish an activity DMP with the overall scope, size, and strategic importance of the activity and its resulting data assets. Washington OUs and Missions must:

Ensure that all activities, as defined in <u>ADS 201</u>, that require a MEL Plan also require implementing partners to create a DMP (see <u>ADS 201.3.4.10A Activity MEL Plan</u>). The DMP may be developed and approved as a section of the MEL Plan or as a separate plan. Similar to the Activity MEL Plan, OUs and Missions must put an Activity DMP in place before major implementation actions begin and update it as necessary (see <u>Foundations for Evidence-Based Policymaking Act of 2018, Title 2</u>; <u>OMB M-19-23</u>, <u>OMB Circular A-130</u>: <u>Managing Information as a Strategic Resource</u>; <u>M-19-18 Federal Data Strategy</u>, #21;

# and OMB-20-12, Program Evaluation Standards and Practices, Appendix C: Evaluation Practices, 8-9).

Ensure that USAID efforts that meet the criteria for Federally Funded Scientific Research require a DMP. In accordance with the <u>USAID Public Access Plan</u>, the <u>USAID Scientific Research Policy</u>, and <u>ADS 578, Information Quality Guidelines</u>, the DMP must describe best practices for managing data assets during the research effort and describe protocols for ensuring public access to related publications and underlying research data. These requirements are in line with findings specific to USAID in the <u>U.S. Government Accountability Office (GAO) report, Federal Research: Additional Actions Needed to Improve Public Access to Research (GAO-20-81); and the <u>Office of Science and Technology Policy's Memorandum on Increasing Access to the Results of Federally Funded Scientific Research 4.b.).</u></u>

# 579.3.2 Using USAID Data

Effective Date: 10/01/2014

USAID encourages its partners, the academic and scientific communities, and the public at large to make broad use of DDL data for innovative scientific, technological, analytical, and other applications. USAID staff are also encouraged to make others aware of this valuable and growing Agency asset.

USAID Operating Units (OUs) will consult Datasets available through the DDL, as that data may prove useful in supporting evidence-based decision-making across all stages of the USAID Program Cycle. This includes decisions related to policy and strategy development, project design, project implementation, performance monitoring, program evaluation, and learning and adapting to improve development outcomes. For example, data could be used to:

- Inform the design and implementation of USAID projects and programs by enabling additional analysis beyond that presented in written reports;
- Adapt projects and programs based on learning from data analysis;
- Incorporate baseline and contextual data to plan, measure, evaluate, adapt, and improve performance of development assistance activities; and
- Facilitate the creation of data visualizations to generate additional insight for advocacy and training purposes.

# 579.3.3 Contributing to the Agency's Development Data Library (DDL) Effective Date: 10/01/2014

The DDL is the Agency's repository of USAID-funded, machine readable data created or collected by the Agency and its implementing partners. Datasets and supporting

documentation created or collected directly by USAID Operating Units or under USAID-funded awards must be submitted for inclusion in the DDL (see 579.3.2.2).

Datasets must be submitted by USAID Operating Units and implementing partners through the DDL Website at <a href="www.usaid.gov/data">www.usaid.gov/data</a> in accordance with the instructions provided at the site. USAID will not necessarily release all Datasets submitted to the DDL to the public in their entirety. USAID will enforce certain exemptions and redactions allowable by law related to privacy, security, and other considerations, as further detailed in this policy (see **579.3.2.3**).

In instances where USAID funds the creation of an entire information technology system or database, or where USAID-funded data is dynamically updated on an information technology system, the requirement to submit Datasets to the DDL may be met by creating an application programming interface (API) for the system, which can then be reported and cleared per instructions on the <u>DDL Website</u>.

Executive Order 13642, "Making Open and Machine Readable the New Default for Government Information", and OMB Open Data Policy, "Managing Information as an Asset" (M-13-13), call for the management of government information as an asset throughout its life cycle to promote interoperability and openness, and, wherever possible and legally permissible, to ensure that data are released to the public in ways that make the data easy to find. The DDL does this by making USAID-funded Datasets available to a broad array of stakeholders, including Agency staff, implementing partners, the academic and scientific communities, and the general public.

#### 579.3.3.1 Who Must Submit Data to the DDL

Effective Date: 10/01/2014

USAID staff, as well as contractors and recipients of USAID assistance awards (e.g. grants and cooperative agreements), must submit any Dataset created or collected with USAID funding to the DDL in accordance with the terms and conditions of their awards. This is in keeping with <a href="Executive Order 13642">Executive Order 13642</a> and the <a href="OMB Open Data Policy (M-13-13)">OMB Open Data Policy (M-13-13)</a> which states that an agency's "public data listing may also include, to the extent permitted by law and existing terms and conditions, Datasets that were produced through agency-funded grants, contracts, and cooperative agreements."

## 579.3.3.2 Types of Data To Be Submitted to the DDL

Effective Date: 10/01/2014

Datasets submitted to the DDL will generally be those created in support of Intellectual Work (see <u>ADS 303maa, Section M21</u>) that is uploaded to the Development Experience Clearinghouse (see <u>ADS 540.3.2.1</u>). Datasets submitted to the DDL will also include certain extracts from USAID information systems, as determined by InfoGov in coordination with relevant Operating Units.

Types of data submitted to the DDL must include, but are not limited to, the following:

# a. Data Collected as Part of Performance Monitoring or a USAID-Funded Evaluation:

- Datasets from which indicator values are derived and Datasets underpinning other project data used in quarterly reporting to USAID (for example, lot quality assurance, cluster samples, facility surveys, school attendance, crop and weather monitoring, sector-related sampling)
- Quantitative data underpinning evaluation findings (for example, baseline, midterm, final surveys, and other related Datasets)
- Optional: Qualitative unstructured data such as interview responses or focus group notes

**Note:** While this requirement applies to datasets that underpin monitoring data, it does not apply to performance reporting data that partners submit to USAID portfolio management tools such as AIDtracker Plus, Afghan Info, and other similar tools.

# b. Other Survey Data:

- Surveys to inform project design (for example, population-based and integrated household surveys, economic assessments, organizational capacity assessments (OCAT))
- Public Opinion
- Behavioral
- Biomarker

#### c. Research Data (see 579.3.3)

Specifically as outlined in the February 22, 2013, White House Office
 of Science and Technology Policy Memorandum, "Increasing
 Access to the Results of Federally Funded Scientific Research."

#### d. USAID Information System Data:

- Financial data (obligations, expenditures)
- Official Development Assistance
- USAID Forward monitoring

#### e. Other:

- Development Credit Authority
- U.S. Trade Capacity Building

# f. Supporting Documentation:

- Codebooks
- Data dictionaries
- Forms, templates, and data gathering tools
- Explanations of redactions
- Notes on data quality, data limitations, or data context
- Data gathering methodologies

#### g. Metadata

 Descriptive tags or labels as mandated by the <u>OMB Open Data Policy</u> (M-13-13), in consultation with <u>Project Open Data</u>.

# 579.3.3.3 Redacting Data and Exceptions to the Open Data Mandate Effective Date: 10/01/2014

USAID will not necessarily release to the public all data submitted to the DDL in its entirety.

Executive Order 13642 notes that the order shall not "compel or authorize the disclosure of privileged information, law enforcement information, national security information, personal information, or information the disclosure of which is prohibited by law." It further notes that, "agencies shall incorporate a full analysis of privacy, confidentiality, and security risks into each stage of the information lifecycle to identify information that should not be released. These review processes should be overseen by the senior agency official for privacy. It is vital that agencies not release information if doing so would violate any law or policy, or jeopardize privacy, confidentiality, or national security."

Prior to the public release of a Dataset, CORs, AORs, Information System Owners, or their designee must redact data in accordance with exceptions allowable by law. This includes redactions required by (see **579.2** and **579.3.2.5**):

- SEC/CTIS
- M/CIO Privacy Office, upon the completion of the ODPA (see 579.2.k.1)
- M/MS/IRD
- GC

All other redactions, including those performed directly by the Operating Unit, must fall under one of the "principled exceptions to the presumption in favor of openness" established in <a href="Months Bulletin 12-01">MB Bulletin 12-01</a>, "Guidance on Collection of U.S. Foreign <a href="Assistance Data">Assistance Data</a>." These exceptions include:

- **a.** When public disclosure threatens national security interests;
- **b.** When public disclosure is likely to jeopardize the personal safety of U.S. personnel or recipients of U.S. resources;
- **c.** When public disclosure would interfere with the agency's ability to effectively discharge its ongoing responsibilities in foreign assistance activities;
- **d.** When there are legal constraints on the disclosure of business or proprietary information of non-governmental organizations, contractors, or private sector clients;
- **e.** When the laws or regulations of a recipient country apply to a bilateral agreement and restrict access to information; or
- f. When data reveal private information about individuals that must be kept confidential consistent with ethical guidelines and federal regulations.
  CORs/AORs, Information System Owners, or their designee must:
  - **a.** Document in the DDL the rationale for redactions according to the exceptions and requirements outlined above;
  - **b.** Complete (or ensure the completion of) and sign the Open Data Privacy Analysis template (ODPA) required by the M/CIO Privacy Office; and
  - **c.** Certify the completion of all redactions required by SEC/CTIS, the M/CIO Privacy Office, M/MS/IRD, GC and other principled exceptions to release identified by the COR/AOR, prior to public release of the Dataset through the DDL.

To the extent that the redaction process is likely to remove information that would prove useful during secondary data analysis, Operating Units must work within prevailing best practices to identify alternative redaction methods or consider, with their GC or RLO point of contact, assigning an access level of "Restricted Public" to the Dataset (see **579.3.2.4**). Any exceptions to this policy must be approved by the Assistant Administrator for the Bureau for Management.

#### 579.3.3.4 Dataset Access Levels

Effective Date: 10/01/2014

CORs/AORs must designate an access level for each Dataset and document the rationale for the designation in the DDL. Datasets must be documented with one of these three access levels as mandated by the <a href="Open Data Policy">Open Data Policy (Section III.4)</a>, in consultation with <a href="Project Open Data">Project Open Data</a>:

 Public: Dataset is or could be made publicly available to all without restrictions.

For the "Public" access level, Operating Units may also document technical or resource barriers to increasing access to this Dataset.

• Restricted Public: Dataset is available under certain use restrictions. One example, among many, is a [Dataset] that can only be made available to select researchers under certain conditions, because the Dataset contains sufficient granularity or linkages that make it possible to re-identify individuals, even though the Dataset is stripped of Personally Identifiable Information (PII). Another example would be a Dataset that contains PII and is made available to select researchers under strong legal protections. This category includes some but not all Datasets designated as Controlled Unclassified Information (CUI), consistent with <a href="Executive Order 13556">Executive Order 13556</a>.

For the "Restricted Public" access level, Washington Operating Units, in consultation with GC, or overseas Operating Units, in consultation with the appropriate RLO, must document the conditions under which select individuals may obtain access to this Dataset.

Non-Public: Dataset is not available to members of the public. This category includes Datasets that are only available for internal use by the Federal Government, such as by a single program, single agency, or across multiple agencies. This category might include some but not all Datasets designated as Controlled Unclassified Information (CUI), consistent with Executive Order 13556. Some non-public Datasets may still potentially be available to other intra-agency Operating Units and/or other government agencies, as discussed in <a href="OMB Memorandum M-11-02: Sharing Data While Protecting Privacy">OMB Memorandum M-11-02: Sharing Data While Protecting Privacy</a>.

For the "Non-Public" access level, Washington Operating Units, in consultation with GC, and overseas Operating Units, in consultation with their RLO, must document the rationale for specifying that the data cannot be made public.

# 579.3.3.5 Required Clearances and Data Publication Process

Effective Date: 03/26/2020

USAID has adopted a <u>Data Publication Process</u> requiring clearances on data release. Required clearances are as follows:

- **a.** Office of Security / Counterterrorism and Information Security Division (SEC/CTIS)
- **b.** Bureau for Management, Office of the Chief Information Officer, Information Assurance Division / Compliance and Risk Management Branch (M/CIO Privacy Office) (M/CIO/IA/CRM)
- **c.** Bureau for Management, Office of Management Services, Information and Records Division (M/MS/IRD)
- **d.** Operating Unit of Origin (OUO) The Operating Unit where the COR/AOR for the award under which the data was generated is assigned; or the Operating Unit where the owner of the USAID information system from which the data was extracted is assigned.

The OUO is responsible for obtaining clearances from other Operating Units that may be affected by the release of the data and/or from other entities that may have jointly funded the data. This may include, for example, obtaining clearances from other U.S. Government agencies, other governments, or multilateral organizations.

In such instances where a Dataset contains data relevant to several USAID Operating Units, the Data Steward in the OUO should circulate a description of the dataset to Data Stewards in other relevant Operating Units, inviting participation in the clearance process. The OUO may then require clearance only from those Operating Units requesting inclusion. This procedure is optional, and the extent to which the OUO obtains additional clearances from other Operating Units is ultimately left to the discretion of the OUO.

In instances where a Dataset contains research on human subjects, the OUO may consult with USAID's Cognizant Human Subjects Officer (CHSO) to determine whether additional clearances or documentation of informed consent are required.

e. The Office of General Counsel (GC) or Resident Legal Officer (RLO) – Clearance is not required. The GC/RLO will provide a review of specific legal questions on the release of Datasets, as needed by the Washington Operating Unit/Overseas Operating Unit.

Once a Dataset has been cleared and released according to the requirements outlined above, or has already been released publicly according to a process that pre-dates this policy, ongoing updates to the Dataset will only require clearance from the Operating Unit of Origin, as long as the Dataset remains unchanged in terms of its structure and the categories of data (e.g. column headings) represented. Once these clearances are obtained, Datasets that were released publicly prior to the effective date of this policy must be tagged with metadata and accompanied by supporting documentation as required by Project Open data and by USAID (see **579.3.2.6c**).

#### 579.3.3.6 Standards for Data Submitted to the DDL

Effective Date: 10/01/2014

#### a. Submission

Datasets and supporting documentation must be submitted by USAID Operating Units and implementing partners to the <u>DDL</u> by following the instructions at <u>www.usaid.gov/data</u>. Datasets will be cleared for release as detailed in USAID's Data Publication Process (see **579.3.2.5**).

#### b. Machine Readable Format

Datasets submitted to the DDL must be in non-proprietary, machine readable format, regardless of whether the data are expected to be publicly released. For example, spreadsheets submitted in a non-proprietary format such as comma separated values (CSV) are acceptable, while submissions using proprietary software owned by companies such as Adobe, Intuit, Lotus, or Microsoft are not.

Datasets submitted to the DDL must be machine readable, in accordance with the following definition from **OMB Circular A-11**:

Format in a standard computer language (not English text) that can be read automatically by a web browser or computer system. (e.g.; xml). Traditional word processing documents, hypertext markup language (HTML) and portable document format (PDF) files are easily read by humans but typically are difficult for machines to interpret. Other formats such as extensible markup language (XML), (JSON), or spreadsheets with header columns that can be exported as comma separated values (CSV) are machine readable formats. It is possible to make traditional word processing documents and other formats machine readable but the documents must include enhanced structural elements.

# c. Supporting Documentation

Datasets submitted to the DDL must also be accompanied by supporting documentation, defining the fields within the Dataset and any categories or labels within the Dataset that may require explanation to an individual not familiar with the data. This may be accomplished through the submission of a codebook or data dictionary. When available, scopes and methodologies, such as survey protocols and instruments used to collect and analyze the data must also be submitted to the DDL, along with annotations to inform the general public of any known data quality issues. Datasets must be accompanied by metadata as required by <a href="Project Open Data">Project Open Data</a> and other metadata assigned by USAID. This may be accomplished by following the instructions at <a href="https://www.usaid.gov/data">www.usaid.gov/data</a>.

#### d. Cleaned of Sensitive Data

Datasets submitted to the DDL must not contain classified, proprietary, or personally identifiable information.

# 579.3.3.7 Timing of Dataset Submissions to the DDL

Effective Date: 10/01/2014

# a. Implementing Partner Submissions to the DDL

USAID contractors and recipients of USAID assistance awards must submit Datasets governed by this policy, and supporting documentation, to the <u>DDL</u> in accordance with the clause or provision in their award.

#### b. Operating Units Submissions to the DDL

USAID Operating Units, working through their Data Steward, must submit Datasets created directly by USAID to the DDL upon completion of their analysis of the data.

#### c. Dataset Review by the COR/AOR or Information System Owner

Prior to public release of the Dataset through the DDL, the COR/AOR is responsible for reviewing the Dataset, which includes identifying principled exceptions to release, redacting (or ensuring the redaction of) sensitive information, and obtaining required clearances (see **579.3.2.5**). The COR/AOR or their designee must commence review of Datasets within 30 calendar days of receipt from an implementing partner. Upon receiving from an implementing partner an index of all Datasets and Intellectual Work created or obtained under an award, the COR/AOR must ensure that all Datasets generated under the award have been uploaded to the DDL. Information System Owners must commence reviews of Datasets within 30 calendar days of the Dataset being identified for inclusion in the DDL.

#### 579.3.4 Special Considerations for Research Data

Effective Date: 10/01/2014

The Development Data Library (DDL) is part of USAID's strategy to increase access to the results of the research it funds, in accordance with the February 22, 2013, Memorandum from the White House Office of Science and Technology Policy entitled, Increasing Access to the Results of Federally Funded Scientific Research. This ADS chapter uses the term "research" as referenced in the February 22 memorandum and as further defined in relevant OMB circulars including, OMB A-11 and OMB A-21. Research data uploaded to or referenced in the DDL must comply with ADS 578, Information Quality Guidelines where applicable, particularly data considered "Influential Scientific, Financial, or Statistical Information" (ADS 578.3.4.6). USAID recognizes the value of research data, not only to the general public, but to the academic and scientific communities. As such, it supports the standardization and interoperability of research data and the inclusion of USAID-funded research in databases commonly accessed by the academic and scientific communities.

# 579.3.4.1 Research Databases

Effective Date: 10/01/2014

Should USAID staff or implementing partners submit a Dataset to a publicly accessible research database, they are not required to submit the data to the DDL. However, they must submit a notice to the DDL, providing details on where and how to access the data, in accordance with the instructions found at <a href="https://www.usaid.gov/data">www.usaid.gov/data</a>. They must submit this notice to the DDL no later than when the data are ready to be submitted to a peer-reviewed journal for publication, or no later than five calendar days prior to the conclusion of the award, whichever occurs earlier.

# 579.3.4.2 Research Involving Human Subjects

Effective Date: 10/01/2014

Operating Units are responsible for ensuring the redaction of sensitive data (see **579.2.g**). In addition, Datasets involving human research subjects must be noted as such upon upload to the DDL in accordance with the instructions posted at <a href="http://www.usaid.gov/data">http://www.usaid.gov/data</a>.

#### 579.3.4.3 Embargos on Data Publication

Effective Date: 10/01/2014

USAID may embargo, or temporarily withhold from public release for a reasonable period (e.g. 12 months), a Dataset resulting from federally funded research while the Dataset is the subject of a pending publication or pending patent application. Implementing partners must still submit the Dataset to USAID, and with agreement of the Contract or Agreement Officer, it can be held as non-public until the conclusion of the embargo period.

# 579.4 MANDATORY REFERENCES

## 579.4.1 External Mandatory References

Effective Date: 10/01/2014

- a. <u>Executive Order 13556, Controlled Unclassified Information</u>
- b. <u>Executive Order 13642, Making Open and Machine Readable the New</u>
  Default for Government Information
- c. Freedom of Information Act of 1966, 5 U.S.C. §552
- d. OMB Bulletin 12-01: Guidance on Collection of U.S. Foreign Assistance
  Data
- e. OMB Memorandum M-11-02: Sharing Data While Protecting Privacy
- f. OMB Memorandum M-13-13: Open Data Policy-Managing Information as an Asset
- g. Privacy Act of 1974, 5 U.S.C. §552a As Amended
- h. Project Open Data
- i. White House Office of Science and Technology Policy Memorandum, Increasing Access to the Results of Federally Funded Scientific Research

## 579.4.2 Internal Mandatory References

Effective Date: 07/31/2018

- a. ADS 302, USAID Direct Contracting
- b. ADS 302mas, Special Provisions for Acquisitions
- c. <u>ADS 303, Grants and Cooperative Agreements to Non-Governmental</u>
  Organizations
- d. ADS 303maa, Standard Provisions for U.S. Nongovernmental Organizations
- e. <u>ADS 303mab, Standard Provisions for Non-U.S. Nongovernmental</u>
  <u>Organizations</u>
- f. <u>ADS 303mat, Standard Provisions for Fixed Obligation Grants to Nongovernmental Organizations</u>
- g. ADS 306, Interagency Agreements

- h. ADS 306mac, PASA Annex C
- i. ADS 318, Intellectual Property Rights
- j. ADS 540, USAID Development Experience Information
- k. ADS 578, Information Quality Guidelines
- I. <u>ADS 579maa, Foreign Assistance Reporting and the Foreign Assistance</u>

  <u>Data Redaction System</u>
- m. ADS 579mab, Activity Location Data
- n. **USAID Evaluation Policy**
- 579.5 ADDITIONAL HELP

Effective Date: 08/27/2019

- a. ADS 579saa, Geographic Data Collection and Submission Standards
- b. <u>ADS 579sab, Protecting Sensitive Information Prior to Publication of USAID</u>
  Foreign Assistance Data
- 579.6 **DEFINITIONS**

Effective Date: 10/01/2014

The terms and definitions listed below have been incorporated into the ADS Glossary. See the ADS Glossary for all ADS terms and definitions.

#### **Data Steward**

The term "Data Steward" refers to a role assigned to a USAID staff member under their existing position. A Data Steward provides guidance to their Operating Unit to ensure that the Operating Unit's USAID-funded data is made open to the public and machine readable by default, in accordance with <a href="White House Executive Order">White House Executive Order</a>
13642 and Office of Management and Budget (OMB) Policy M-13-13 on Open Data. The Data Steward also provides periodic reports to their operating unit and USAID leadership on data inventoried by their operating unit and cleared for public release. (Chapter 579)

#### **Dataset**

An organized collection of structured data, including data contained in spreadsheets, whether presented in tabular or non-tabular form. For example, a Dataset may represent a single spreadsheet, an extensible mark-up language (XML) file, a geospatial data file, or an organized collection of these. (**Chapter 579**)

# **Development Data Library (DDL)**

The DDL is USAID's repository of USAID-funded, machine readable data created or collected by the Agency and its implementing partners. (**Chapter 579**)

#### Intellectual Work

Intellectual Work includes all works that document the implementation, monitoring, evaluation, and results of international development assistance activities developed or acquired under an award, which may include program and communications materials, evaluations and assessments, information products, research and technical reports, progress and performance reports required under the award (excluding administrative financial information), and other reports, articles and papers prepared by the recipient under the award, whether published or not. The term does not include the recipient's information that is incidental to award administration, such as financial, administrative, cost or pricing, or management information. (Chapter 579)

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