
Sample Attachment for Privacy Certificate

Brief description of the project: {§ 22.23(b)}

Please provide a one- or two-paragraph description of the overall project, similar to an abstract of the project. The description should include the type(s) of data to be used in the project.

Procedures to notify participants, as required by 28 CFR § 22.23(b)(4), or, if notification is to be waived, pursuant to 28 CFR § 22.27(c), justification for waiver: {§ 22.27}

Please note that many projects involving the collection of data identifiable to a private person also fall under DOJ human subjects regulations at 28 CFR Part 46. Projects involving human subjects are required to obtain informed consent in accordance with the human subjects regulations. If you have any question about whether your project involves human subjects, please consult with OJJDP or with your institution's Institutional Review Board (IRB).

If your project does not involve human subjects as defined in 28 CFR Part 46, then you are only required to notify participants, either orally or in writing, that the information obtained from them will be used strictly for research or statistical purposes and that their participation is voluntary, as required by 28 CFR § 22.27.

This section should include information on informed consent or notification procedures as appropriate for your project.

Procedures for storing and securing the data: {§ 22.23(b)(5), § 22.23(b)(7)}

Describe the procedures that will be put in place to ensure administrative and physical security of identifiable data and to preserve anonymity of private persons to whom information relates (e.g., hard copies of data will be stored in a locked file cabinet with limited access to cabinet key, procedures for protecting computer data files with identifying information, and so on).

Disposition of data will occur in the following manner: {§ 22.23(c), § 22.25}

Describe how confidentiality of identifiable data will be protected upon completion of the project.

Assurance that the anonymity of private persons will be protected: {§ 22.23(b)(8), § 22.22}

Provide assurance that project findings and reports prepared for dissemination will not contain information that can reasonably be expected to be identifiable to a private person except as authorized under 28 CFR § 22.22. If the project will result in the public release of statistical tables or microdata files, please provide assurance that appropriate measures will be taken to minimize the risk of disclosing confidential information about identifiable persons. It is not necessary to identify the precise measures that will be used. The applicant/grantee simply needs to assure OJJDP that before any statistical tables or microdata files are released to the public, the applicant/grantee will examine the tables and/or files for potential disclosure problems and take steps to prevent such disclosure.

Reference for further information on disclosure issues:

Federal Committee on Statistical Methodology. 1994. *Statistical Policy Working Paper 22: Report on Statistical Disclosure Limitation Methodology*. Washington, DC: Office of Management and Budget. <http://www.fcsm.gov/working-papers/wp22.html>.

Access to data in identifiable form is limited to the following individuals: {§ 22.23(b)(2)}

Principal Investigator(s):

Project Staff:

Subcontractors:

Please provide name, address, phone number, and organizational affiliation for each of the above-mentioned individuals. If project staff and/or subcontractors have not been determined, please provide as much detail about personnel (e.g., two research assistants) who will have access to data with identifying information on individuals.

Information Transfer Agreements: {§ 22.23(b)(6), § 22.24, § 22.26}

The regulations require that prior to the transfer of identifiable data to persons other than project staff and OJP staff, the persons receiving the data must enter into an Information Transfer Agreement. Please indicate how the transfer of identifiable data will be handled in compliance with 28 CFR § 22.24 and § 22.26. In addition, please assure that a log will be maintained of all transfers of identifiable data in accordance with § 22.23(b)(6).

Identify any conditions that would require waiving an element of the Privacy Certificate and explain: