



Sensitive NAES Data: Application Process

While the vast majority of NAES data are available for immediate download from this website, due to advancements in technology and increasing availability of mergeable public information, the list of data and materials that must be considered of potential risk to respondent confidentiality is expanding. As a consequence of these changes, major studies, not just NAES, are reconfiguring their restricted data procedures to protect respondents in this new world.

NAES items identified as Sensitive NAES Data are not publicly released. Access to Sensitive NAES Data can be requested only through the application process outlined on this webpage, and only for the purpose of scientific and public policy research. Some examples of Sensitive NAES Data are the respondents' specific occupations, and detailed geographic information. The Annenberg Public Policy Center greatly values the trust our respondents place in us to protect their confidentiality, and for this reason we have in place an appropriately strict application process with a heavy burden of proof. We reserve the right to reject any application for any reason, and without explanation. Furthermore, data - such as names and street addresses - will never be made available.

Definitions.

Investigator. The individual who serves as the primary point of contact for all communications involving the Sensitive NAES Data application and any resulting data access agreement. The Investigator must hold a permanent faculty appointment at the Receiving Agency and assumes all responsibility for Receiving Agency employees' compliance with all terms of any resulting data access agreement.

Receiving Agency. The organization employing the Investigator. The Receiving Agency must have an Institutional Review Board/Human Subjects Review Committee that is registered with the United States Department of Health and Human Services (DHHS).

Representative of the Receiving Agency. An individual who has the authority to represent the Receiving Agency in legal agreements and who can bind the Receiving Agency to the obligations contained in any resulting data access agreement.

Research Staff. Students, staff, and other faculty at the Receiving Agency who have obtained NAES authorization to use the Sensitive NAES Data under the Investigator's supervision.

Sensitive NAES Data. The restricted data files and materials provided by NAES, any copies or backups of those files and materials, and any product (whether electronic, hard copy, or otherwise), variables, or fields derived from them.

Eligibility and Signatories.

Only persons who meet the definition of Investigator are eligible to apply for access to Sensitive NAES Data. Other persons (such as students) who would like to use Sensitive NAES Data must work under and apply through an eligible Investigator. In the application, the Investigator must justify the need for the Sensitive NAES Data in his or her research, explain why there are no alternatives to the use of the Sensitive NAES Data, and explain the importance of the research for expanding scientific knowledge.

Should the application be approved, the resulting agreement must be signed by the Investigator and a Representative of the Receiving Agency. Research Staff must sign a supplemental agreement and work under the supervision of the Investigator to access Sensitive NAES Data.

In the case of a multi-institution collaboration, each Receiving Agency must submit a separate application.

. Application Process.

Part A: Initial Application

First, assemble your initial application materials. These three components must be included with your initial application for it to be considered complete:

1. A current appointment letter or similar document that proves that the Investigator has a permanent faculty appointment at the Receiving Agency.
2. A current copy of the Investigator's curriculum vitae (CV) or résumé.
3. A completed application form. You may download the application form here:

[CLICK HERE TO DOWNLOAD AN APPLICATION IN WORD FORMAT](#)

Once you have assembled all of the initial application materials, please mail a complete set (in hard copy) to:

National Annenberg Election Survey (NAES)
ATTN: Sensitive NAES Data Application
Annenberg Public Policy Center
Suite 200
3535 Market Street
Philadelphia, PA 19104-3309
Phone: (215) 898-2641

Part B: NAES Review

Upon receiving the complete set of hard copy materials, NAES personnel will review the initial application. During this review period, NAES may seek clarification regarding the information provided in the initial application materials. At the end of this review period, NAES will communicate to the Investigator its preliminary decision on the application, and may also request corrections or clarifications of the application information.

Part C: IRB Review at Receiving Agency

The Investigator must then submit its application, after having made all changes that NAES has requested, to the Institutional Review Board/Human Subjects Review Committee ("IRB") at the Receiving Agency. The Investigator must also submit to the IRB a memorandum ([which can be accessed by clicking here](#)) that instructs the IRB that, while the Investigator will be conducting secondary data analysis, the increased potential risk of respondent identification associated with use of the Sensitive NAES Data makes inappropriate the usual "exemption" applied to secondary analysis of anonymized datasets. Please be advised that NAES therefore will **not** recognize such exemptions as meeting the requirements of the application process. Please also note that, for multi-institution collaborations, each Receiving Agency must provide proof of IRB approval from its own institution. Upon IRB approval, the Investigator must submit to NAES:

1. Proof that the Receiving Agency's IRB is registered with DHHS;
2. A copy of the materials submitted to the IRB for approval;
3. Notice of IRB approval for the Investigator to conduct the research using Sensitive NAES Data; and
4. If NAES had requested changes to the application materials, a revised application form signed by the Investigator.

Part D: Formal Agreement

Upon receiving all of the materials specified in Part C, NAES will draft and provide the Investigator a formal Agreement ([click here to view a sample confidentiality agreement](#)) ([click here to view a sample supplemental agreement](#)). Once the Agreement is signed and returned to NAES at the address above, NAES will prepare the requested Sensitive NAES Data and send it to the Investigator using overnight/express mail. A Research Staff member may not access the Sensitive NAES Data until NAES acknowledges its receipt of a signed Supplemental Agreement for that Research Staff member.

Timeline.

While we attempt to process applications as quickly as possible, we cannot guarantee a specific turnaround time. If your application is approved, please expect that you will receive the Sensitive NAES Data **no sooner than eight weeks** after we receive the initial set of application materials. This response time assumes that your application is complete and does not need extensive changes or clarification, that the IRB at the Receiving Agency can finish its review within two weeks, and that you are able to return a signed Agreement to us within a week's time of receiving the Agreement from us. Staffing levels and other study priorities may sometimes slow the review process, especially during data collection periods and while we are processing public release files. If your research requires receipt of the Sensitive NAES Data by a particular date, please contact us by email to "APPC@asc.upenn.edu" before submitting an application, to see if we will be able to meet your requested delivery date.

Changes to the Agreement.

Changes to Agreements are at the sole discretion of the NAES Principal Investigators and staff, and will not be approved unless they fall into one of the following three categories:

1. *Adding Research Staff.* Should the research later require additional Research Staff to have access to the Sensitive NAES Data, the Investigator must make this request by email to "APPC@asc.upenn.edu". In the email, please provide the full name, title/position, and contact information for each individual requested to be added, and indicate why they are necessary to add to the agreement. If NAES approves the addition of Research Staff, NAES personnel will provide the Investigator with a Supplemental Agreement that each of the additional Research Staff must sign. The additional Research Staff may not have access to the Sensitive NAES Data until NAES has acknowledged its receipt of the signed Supplemental Agreement for each newly approved Research Staff member.
2. *Changes to the Data Protection Plan.* Changes to the computing or research environment or other aspects of the Data Protection Plan require advance written approval. The Investigator should submit such requests by email to "APPC@asc.upenn.edu". Please describe the changes in detail and explain how the new situation will provide equivalent or better protection for the Sensitive NAES Data. If the requested changes affect IRB approval, then the Investigator must also provide proof that the IRB at each Receiving Agency approves of the changes. Any requested changes may not occur until NAES has indicated its approval in writing. If NAES rejects the requested change, the Sensitive NAES Data must be returned immediately, unless the Investigator agrees to continue to follow the procedures set forth in the NAES-approved Data Protection Plan.
3. *Extensions.* All Sensitive NAES Data applications require that the Sensitive NAES Data be returned to NAES within twelve months after the date of initial delivery. Extensions are not automatically granted. Within two months, but not less than two weeks, before the deadline for returning the Sensitive NAES Data, the Investigator may request an extension of up to six months in duration by sending an email to "APPC@asc.upenn.edu". In the email requesting the extension, the Investigator should describe the progress of the research and explain why the Sensitive NAES Data are needed for an additional period of not more than six months.

All other changes to the Agreement require the submission of an entirely new application. NAES will evaluate the new application as set forth in the Application Process section above.

Violations and Sanctions.

All suspected violations of the Agreement - including unauthorized use or disclosure - must be reported immediately by email to "APPC@asc.upenn.edu". Upon allegation of a violation, the research, use of the research, and use of the Sensitive NAES Data must immediately cease. Allegations will be provided in writing to the Investigator and the Representative of the Receiving Agency, who will have 10 business days to submit a joint response. If NAES determines a violation has occurred, the Sensitive NAES Data must be immediately returned to NAES, and NAES may impose additional sanctions, including but not limited to, the following:

- Revocation of the Agreement and denial of future access to Sensitive NAES Data;
- Report of the violation to the Receiving Agency's IRB, with a request that the institution's sanctions for misconduct be imposed;

- Report of the violation to DHHS, which may result in an investigation of the Investigator and the Receiving Agency;
- Report of the violation to federal and private research funding agencies, with the recommendation that current funding be terminated and future funding be denied to the Investigator and all persons involved in the violation;
- Payment of court-ordered damages to any individual harmed by the unauthorized use or disclosure; and
- Other civil remedies available under law.

Questions?

Please contact us by email to "APPC@asc.upenn.edu" with any questions you might have.