



**Interagency Council on
Statistical Policy**

Leaders of the United States Federal Statistical System



**Standard
Application
Process**

STANDARD APPLICATION PROCESS ANNUAL REPORT FOR 2025

Date: January 2026

This annual report addresses Standard Application Process (SAP) performance and recommendations and identifies opportunities to improve its efficiency.

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Executive Summary

In its third year of operation, the Standard Application Process (SAP) implemented key improvements in transparency, usability, and efficiency while maintaining timely review of applications and a streamlined process to discover and apply for access to Federal confidential data. To ensure ongoing leadership and support for the SAP, the Office of Management and Budget's (OMB) [Memorandum Establishment of Standard Application Process Requirements on Recognized Statistical Agencies and Units \(M-23-04\)](#) established the SAP Governance Board (SAP-GB) as the executive steering committee for the SAP. This 2025 SAP Annual Report is required under the SAP Governance Board (SAP-GB) Charter, which specifies that in fulfillment of its responsibility to monitor the operation of the SAP, the SAP-GB will deliver to OMB and to the Interagency Council of Statistical Policy (ICSP) an annual report of SAP activities that addresses performance, outlines achievements, and identifies opportunities to improve the efficiency of the SAP.

Key accomplishments in Calendar Year 2025 include:

- The continued operation of a standardized process for individuals to apply to access available confidential data assets for evidence-building purposes. In 2025, 317 confidential data access applications were submitted through the SAP portal. The total number of applications submitted since the SAP portal's launch in December 2022 is 1191.
- Compliance with the review time limits outlined in the SAP policy. In 2025, the average time for agencies to review a single-agency application was 53 days (within the 84 days permitted per M-23-04); the average time to review a multi-agency application was 129 days (within the 168 days permitted).
- Maintaining an updated [SAP Data Catalog](#), which lists 1564 confidential data assets for which users may request access, representing an increase of 24 data assets from 2024, and development of a crosswalk between SAP metadata fields and U.S. Data Catalog Vocabulary (DCAT) Version 3 schema.
- Release of four new features on the SAP portal to enhance the user experience: improvements to user dashboard search feature; ability to download an application with comments; addition of an ORCID field to the SAP application; and dynamic data provisioning application questions.
- Publication of six new SAP learning resources.
- Conducting three knowledge-sharing sessions with SAP agencies, enabling agencies to share best practices and boost efficiency.
- Identification of opportunities for integration between the SAP and the National Secure Data Service ([NSDS](#)) Demonstration: providing customer service to SAP users through the NSDS; enabling SAP agencies to provision data to approved users through the NSDS secure compute environment (SCE); and streamlining data sharing through establishing a legal community of practice.

Goals for 2026 and beyond include:

- Develop and transition to an enhanced SAP portal, which will launch from a .gov web domain. The new portal will implement key usability improvements and will be rebranded to reflect consistency and build recognition with other ICSP efforts and the Federal statistical system.
- Conduct usability and cognitive testing on the enhanced SAP portal.
- Ensure all SAP-participating agencies adhere to SAP legislative and policy requirements and provide support to remedy any areas of non-compliance.
- Further integrate with related data ecosystem efforts, such as the National Secure Data Service (NSDS) Demonstration and the Federal Statistical Research Data Center (FSRDC) program. This will include providing recommendations to enable currently unsupported multi-agency linkage projects requested through the SAP via the NSDS, the FSRDC, or other agencies.
- Expand agency participation in the SAP by finalizing the approval of an SAP membership application package and enabling additional agencies to request to join the SAP as data owners.
- Support SAP resource needs by developing SAP budget recommendations for agency implementation of the SAP.
- Streamline the security credentialing experience by investigating and integrating agency data security training requirements.
- Build the SAP user community and promote SAP transparency, such as by developing and publishing additional agency-specific SAP metrics.

Background

Overview of the SAP

The [Foundations for Evidence-Based Policymaking Act of 2018](#) (also referred to as the Evidence Act) required a Standard Application Process (SAP) be established for requests for confidential data from Federal agencies covered under the Confidential Protection and Statistical Efficiency Act (CIPSEA). Section 3583 of the Evidence Act calls for a common application, standard review criteria, timeframes for prompt determinations, reporting metrics for transparency, an appeals process for negative determinations, and outreach to stakeholder communities. Following the passage of the legislation, OMB published a policy memorandum entitled [Establishment of Standard Application Process Requirements on Recognized Statistical Agencies or Units \(M-23-04\)](#), which outlines process requirements for agencies implementing the SAP.¹ Concurrent with

¹ Per 44 USC §3583, the 16 OMB-recognized statistical agencies and units are required to implement the SAP. As of January 2026, these agencies are: Bureau of Economic Analysis (Department of Commerce); Bureau of Justice Statistics (Department of Justice); Bureau of Labor Statistics (Department of Labor); Bureau of Transportation

the policy, the [SAP portal](#) was launched, and the SAP Governance Board, under the purview of the ICSP, was convened.

Working within the requirements and guiding principles of both the legislation and policy, the SAP-GB, along with its working groups, seek to further enhance the SAP portal, meet the needs of stakeholders, and ensure all requirements of both the legislation and policy continue to be met as the SAP evolves. This annual report provides an overview of SAP activities and accomplishments for the Calendar Year 2025.

The SAP is an interagency effort led by OMB and the ICSP to implement a shared service across the Federal statistical system, per the Evidence Act. The U.S. Chief Statistician and his/her staff lead provide key leadership for the SAP. The SAP-GB, as required by M-23-04, provides executive oversight and guidance of the SAP, while its interagency working groups are tasked with executing technical, communications, budget, and policy requirements of the SAP. A project management office (PMO), the National Center for Science and Engineering Statistics (NCSES), provides project integration and support across the effort.

The SAP portal was launched and began accepting applications on December 8, 2022. The main purpose of the SAP portal is to enhance, streamline, and standardize requests for public access to confidential data for the purposes of evidence building, thereby reducing the burden of applying for confidential data, which previously involved separate processes with each of the 16 OMB-recognized statistical agencies and units ([RSAUs](#)). The SAP portal is comprised of the SAP Data Catalog (a searchable metadata inventory of confidential Federal data assets), the SAP application (a common application form for requesting access to this confidential data), and the SAP reviewer's dashboard (which allows agency reviewers to adjudicate applications based on the common review criteria outlined in the SAP policy).

Statistics (Department of Transportation); Center for Behavioral Health Statistics and Quality (Department of Health and Human Services); Census Bureau (Department of Commerce); Energy Information Administration (Department of Energy); Economic Research Service (Department of Agriculture); Microeconomic Surveys Unit (Federal Reserve Board); National Agricultural Statistics Service (Department of Agriculture); National Animal Health Monitoring System (Department of Agriculture); National Center for Education Statistics (Department of Education); National Center for Health Statistics (Department of Health and Human Services); National Center for Science and Engineering Statistics (National Science Foundation); Office of Research, Evaluation, and Statistics (Social Security Administration); Statistics of Income Division (Income Revenue Service)

SAP Governance Structure

The overall governance and working group structure of the SAP provides the leadership and expertise necessary to maintain and enhance the SAP portal and processes. Figure 1 shows the governance structure for the SAP.

The **Interagency Council on Statistical Policy (ICSP)** is the overarching body providing oversight for the SAP in support of OMB, per M-23-04. The ICSP, chaired by the U.S. Chief Statistician, supports implementation of the Federal statistical system's vision to operate as a seamless system, working together to provide strategic vision and robust implementation in support of the U.S. Federal statistical system's critical longstanding — and expanding — role for supporting evidence-based decision-making.

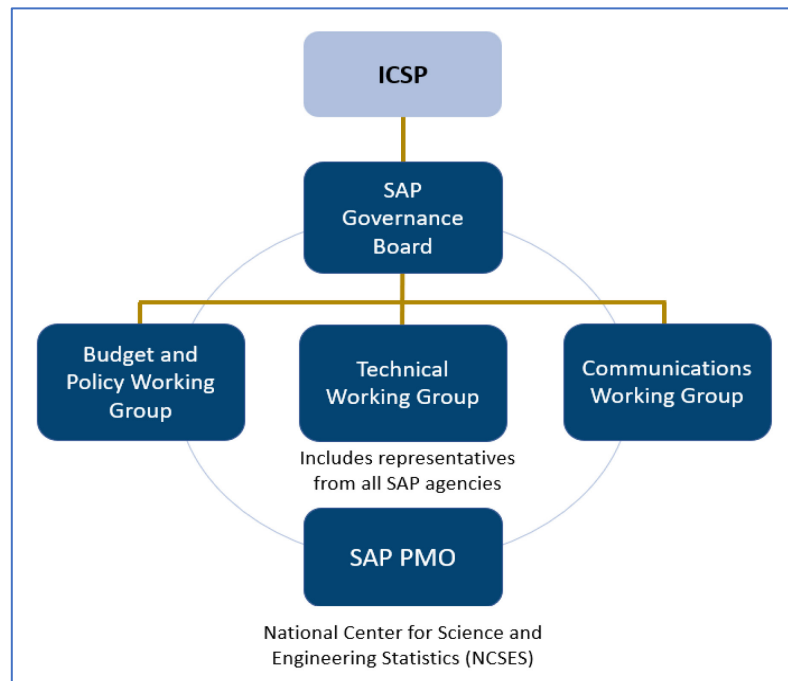


Figure 1: SAP Governance Structure

The **SAP Governance Board (SAP-GB)** provides executive level guidance and leadership in SAP implementation, including providing vision, executive decision-making, and policy-update recommendations to OMB.

The **Technical Working Group (TWG)** operationalizes the legislative and policy requirements of the SAP for implementation into the SAP portal.

The **Communications Working Group (CWG)** focuses on legislatively required stakeholder engagement, including communications, gathering of stakeholder feedback, and developing and distributing outreach and user materials.

The **Budget and Policy Working Group (BPWG)** identifies budget needs and formulates budget strategy to ensure agencies can meet legislative and policy requirements, as well as provides policy recommendations as requested by the SAP-GB to inform future OMB policy decisions.

The **SAP Project Management Office (PMO)**, led by NCSES, implements, maintains, and supports the SAP as directed by the ICSP, OMB, and the SAP-GB.

The **Inter-University Consortium for Social and Political Research (ICPSR), University of Michigan**, was the technical contractor supporting the online SAP portal at www.researchdatagov.org for 2025. In September 2025, the technical contract was re-competed and awarded to **Mathematica**. Mathematica is building an enhanced SAP portal

that will be launched under a dot gov domain in 2026. ICPSR continues to operate the current portal until the new portal goes live. (ICPSR and Mathematica are not represented in Figure 1, as Figure 1 depicts the Federal governance structure only.)

SAP Portal Metrics

1191 applications have been submitted through the SAP portal since its launch in December 2022.

Application numbers in 2025 were impacted by agency pauses. In 2025, four agencies paused review of their SAP applications, postponed their application window, or removed assets from the SAP Data Catalog. The SAP portal posted public notifications notifying potential applicants that these agencies were not accepting new applications. Agency pauses affected the following metrics:

- Applications submitted by year, month, and agency
- Review times (some agencies paused review, resulting in some applications with review times exceeding the policy-mandated time frames)

Agencies who paused their review or postponed their application window were the Bureau of Labor Statistics (BLS), the Center for Behavioral Health Statistics and Quality (CBHSQ), the National Center of Education Statistics (NCES), and the Statistics of Income (SOI) Division of IRS. For more information, see [Agency Pauses](#).

All metrics in this report exclude applications that are withdrawn after submission. Applications may be withdrawn by the applicant, and abandoned applications are automatically withdrawn after six months of inactivity, in accordance with M-23-04. Withdrawals may cause fluctuation between metrics in this report and the metrics included in previous annual reports.

Applications by Year, Month, and Agency

Applications per year

Figure 2²³ shows applications submitted per calendar year. “Application submissions” refers to submissions of new applications only; revisions of applications are not included in this chart. This chart also excludes applications withdrawn after submission.

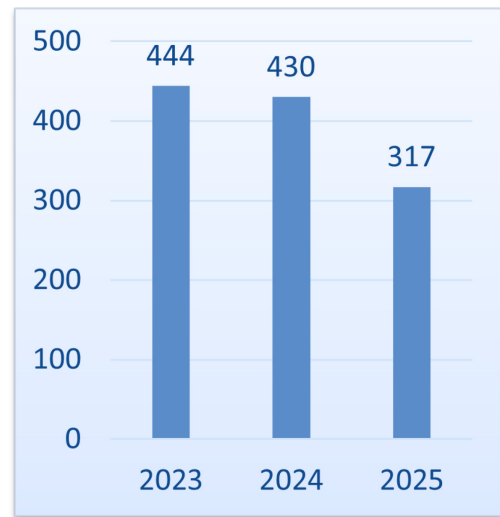


Figure 2: Applications submitted per calendar year

Applications per month

Figure 3⁴ shows application submissions per month. Applications spiked in quarter 2 of 2023 and 2024, as the Statistics of Income (SOI) Division of the Internal Revenue Service accepts applications only during their application window, which is June 1st – 31st of each year. In 2025, SOI requested to postpone their application window.

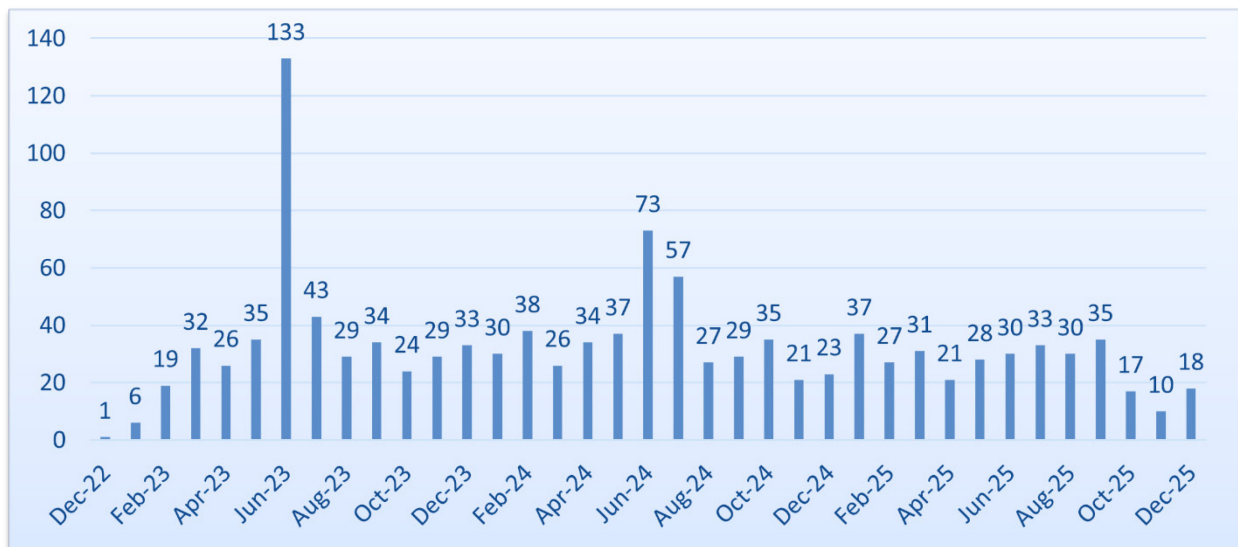


Figure 3: Applications submitted per month

² One application was submitted in 2022. This is included in the total count for 2023.

³ Annual numbers in Figure 2 show some reductions from the metrics in the 2024 Annual Report. This reduction is due to applications withdrawn after submission.

⁴ Numbers in Figure 3 show some reductions from the metrics in the 2024 Annual Report. These reductions are due to applications withdrawn after submission.

Applications per agency

Figure 4 shows the number of applications submitted to each agency from December 2022 through December 2025⁵. The SAP-GB is working with two agencies (EIA and ORES⁶) to ensure their available data is listed in the SAP Data Catalog.

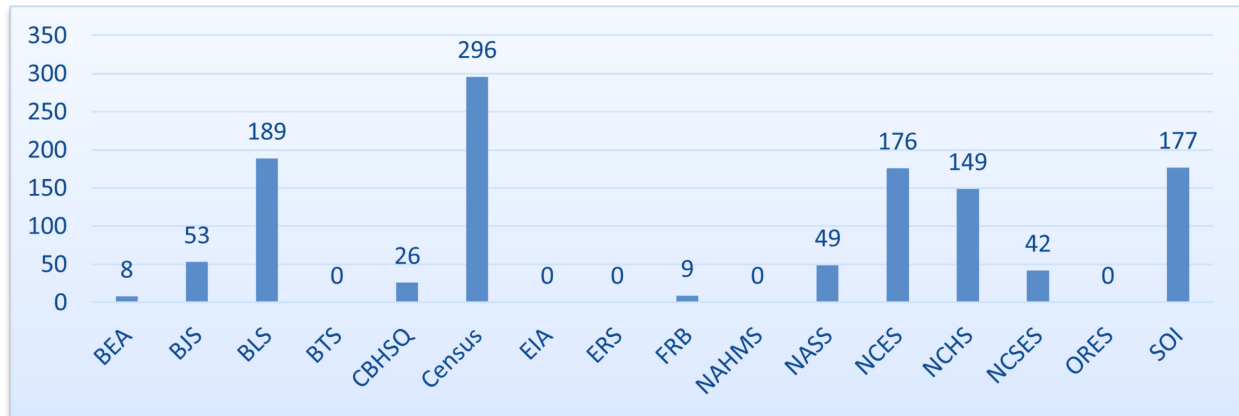


Figure 4: Applications submitted per agency (Dec 2022 - Dec 2025)

Application Types

The SAP policy (M-23-04) delineates review time limits by application type and outlines three application types:

- Single agency application (an application for data from one agency that has only one authorizer): 12-week review time limit (84 calendar days)
- Multi-agency application (an application for a dataset that has multiple authorizers within the SAP or datasets owned by different agencies): 24-week review time limit (168 calendar days)
- Requiring approval outside the SAP (an application for data with authorizers outside the SAP, such as a state government): exempt from review time limits

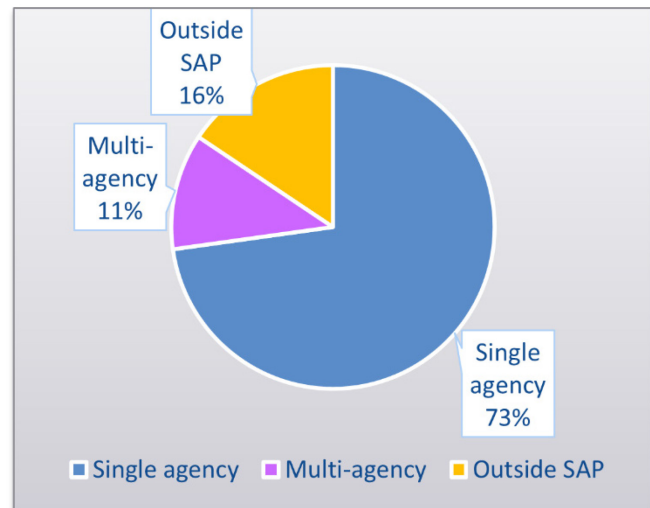


Figure 5: Percentage of application types (Dec 2022 - Dec 2025)

⁵ In addition to the submissions shown in Figure 4, 17 applications were submitted to two or more data-owning agencies.

⁶ EIA - Energy Information Administration; ORES - Office of Research, Evaluation, and Statistics

Figure 5 shows the percentage breakdown of applications submitted via the SAP portal, from launch (December 2022) through 2025.

Figure 6 displays how many application types each agency has received. Figure 6 excludes BTS, EIA, ERS, NAHMS, and ORES (no applications submitted).

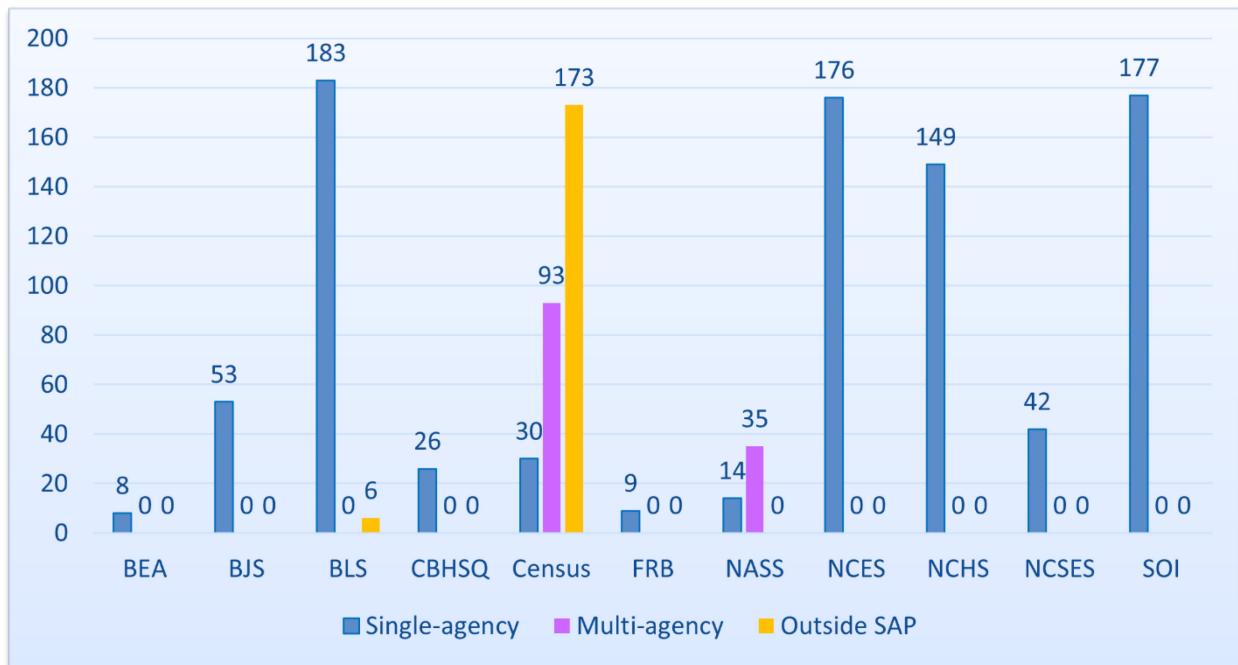


Figure 6: Application types submitted to each agency (Dec 2022 - Dec 2025)

Review Times

The average review times are below. These reflect the average number of calendar days to review each application type, from December 2022 to December 2025.

- Single-agency applications: 75 calendar days (in compliance with policy time limit of 84 days)

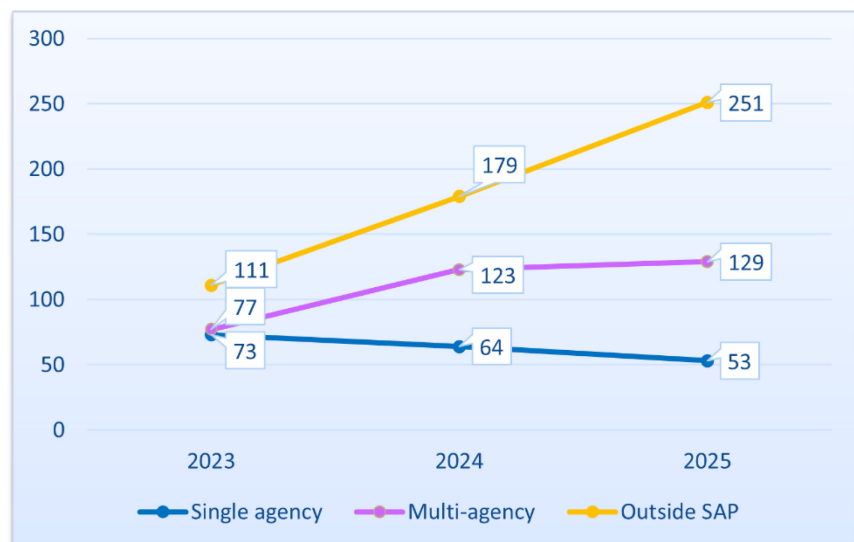


Figure 7: Average number of days to review each application type

- Multi-agency applications: 115 calendar days (in compliance with policy time limit of 168 days)
- Requiring approval outside the SAP: 196 calendar days (exempt from policy time limits)

Approval Rate

Figure 8 shows the aggregate approval rate for the SAP. Approval rates are calculated over the period of time from launch (December 2022) through 2025. To see approval and non-approval metrics by agency, visit the SAP portal [Agency Information and Metrics page](#).

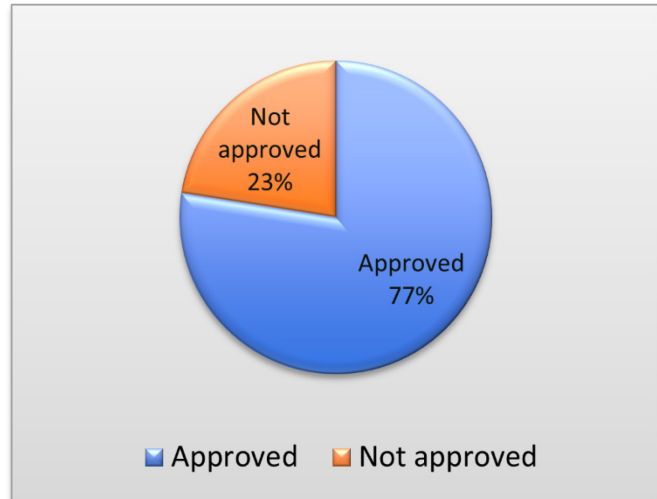


Figure 8: Aggregate approval rates (Dec 2022 - Dec 2025)

Accomplishments in 2025

The SAP portal completed its third full year of operation in 2025. The governance framework of the SAP is a cornerstone of its success, leveraging expertise from across the Federal statistical system through interagency working groups and backed by a robust Project Management Office. See [Appendix 1](#) for a list of SAP-GB and SAP working group member agencies during 2025.

SAP Governance Board

The SAP-GB serves as the executive steering committee for the SAP and operates as a subcommittee of the full ICSP. It serves dual roles: to represent the Federal agencies and units utilizing the SAP and to assist OMB in the oversight and coordination of the SAP. This includes identifying opportunities to improve the efficiency of the SAP, expanding use of the SAP by other agencies and organizations, approving a communications strategy, ensuring consistent engagement with stakeholders, and monitoring broad Federal statistical policy perspectives as they pertain to the SAP. The SAP-GB meets quarterly.

SAP Governance Board Accomplishments:

- Provided input on OMB’s interim guidance for agencies temporarily unable to meet their obligations to review applications for its data assets and complete actions on active projects through the SAP -- enabling a standard process, communication with SAP applicants, and public transparency via notices on the SAP portal.
- Approved designs for enhanced SAP metrics. These metrics will be additional to the [public metrics](#) required by the Evidence Act.

- Worked closely with three agencies to provide support for their required participation in the SAP per the Evidence Act by setting timelines for these agencies to list confidential data assets in the SAP Data Catalog and accept applications via the SAP portal.
- Identified three potential opportunities for future consideration for integration between the SAP and the National Secure Data Service (NSDS): providing customer service to SAP users through the NSDS; enabling SAP agencies to provision data to approved users through the NSDS secure compute environment (SCE); and streamlining data sharing through establishing a legal community of practice (See [Appendix 2](#)).

SAP Program Management Office

The PMO facilitates communication across agencies, provides central coordination for SAP working groups, and integrates project management processes and documentation across the SAP effort. The PMO is also responsible for the development, operation, and maintenance of the SAP portal in accordance with SAP policy (M-23-04). When development and maintenance of the SAP portal is done by a contractor, the PMO is responsible for selecting the contractor and monitoring contractor performance. As noted earlier in this report, ICPSR is the current technical contractor for the SAP portal.

SAP PMO Accomplishments:

- Managed project integration across three SAP working groups and the SAP-GB
- Coordinated user testing for new SAP portal features
- Monitored, documented, and responded to user feedback on the SAP portal
- Coordinated with the SAP-GB and OMB to implement a process for agencies temporarily pausing application review. This process included contacting researchers with draft or pending applications and posting language on the SAP portal notifying researchers of agency pauses. The PMO worked with individual agencies to develop a customized process and memo for each paused agency to address their unique situation and provide documentation.
- Re competed and awarded the SAP portal technical contract to a new vendor. This fulfills a FY 2025 ICSP milestone, supporting SAP portal site enhancements and ensuring open and fair competition to select a vendor offering high quality and innovation (see [Appendix 3](#) for the full list of FY25-26 ICSP milestones).
- Developed a comprehensive, updated suite of SAP technical requirements to deliver to the new vendor.
- Conducted a crosswalk between the SAP Data Catalog metadata fields and U.S. Data Catalog Vocabulary (DCAT) Version 3 schema. This crosswalk will enable improved discoverability of SAP data assets, compliance with the DCAT Version 3 schema, and compliance with OMB memorandum [M-25-05](#).

Budget and Policy Working Group

The BPWG is delegated with advising on the annual budget requirements of the SAP and consulting with OMB and the ICSP to identify funding needs; developing transparent criteria by which requests from non-statistical agencies or units to utilize the SAP to provide access to their data will be reviewed; and developing recommendations to facilitate the sharing of an applicant's completed credentialing requirements across statistical agencies and units.

Budget and Policy Working Group Accomplishments:

- Held an agency sharing session to identify opportunities to centralize SAP services such as reviewing applications, data curation, credentialing, ongoing management of projects, or disclosure review. The agency sharing session had 33 attendees, with 13 agencies represented.

Communications Working Group

The CWG is responsible for engaging with the SAP stakeholder community, which includes conducting outreach and inviting input in accordance with the SAP Communications Plan. In addition, the working group develops user materials, informs stakeholders of key SAP portal and policy updates, reviews user feedback submitted via the SAP portal, and creates and implements cohesive branding for SAP communications. The success of the CWG has led to it serving as a model for other integrated communications efforts, such as the NSDS Working Group.

Communications Working Group Accomplishments:

The SAP Communications Plan outlines three major goals for the SAP: 1) Engage in two-way communication with applicants, reviewers, participating agencies, and other SAP stakeholders; 2) maintain SAP outreach channels to deliver appropriate content to SAP audiences; and 3) develop and maintain learning resources for SAP users. Accomplishments for 2025 are listed below:

- Engaged in two-way communication with applicants, reviewers, participating agencies, and other SAP stakeholders: the CWG planned and conducted the following two events, open to Federal staff only:
 - Agency sharing session on Best Practices in the SAP: Agency representatives shared their approaches regarding researcher support and applying the SAP review criteria (36 attendees)
 - Panel discussion on SAP Program Development, spotlighting three SAP agencies to discuss how their agency handled the transition to the SAP and steps it took to train its staff and establish its program (40 attendees)
- Maintained SAP outreach channels to deliver appropriate content to SAP audiences: maintained the [SAP informational website](#), updating content regularly; maintained and

updated content on the [SAP portal](#), including agency contact information, applicant instructions, user guides, and FAQs

- Developed and maintained [learning resources](#) for SAP users and new materials for SAP stakeholders. New learning resources included the following:
 - What to Expect After Submitting an Application (video)
 - Review Timeframes (PDF)
 - SAP Application Questions (PDF)
 - Data Linkages 101 (PDF)
 - Deep Dive: ORCID's (PDF)
 - SAP Review Criteria (PDF)
- Updated SAP user guides for applicants and reviewers
- Developed additional aggregate metrics to share with the public, improving SAP transparency; these are scheduled for public release in early 2026.

Technical Working Group

The TWG is responsible for providing oversight and review of technical operational activities of the SAP policy, which includes ensuring that the SAP portal fulfills the requirements of the Evidence Act. The group identifies technical requirements for new features and functionality, collaborates with the SAP PMO and the SAP technical contractor to resolve issues, verifies that the [SAP Data Catalog](#) is up to date, advises the PMO on feature prioritization, and participates in user acceptance testing of new features and functionality.

Technical Working Group Accomplishments:

- Provided oversight on release of four new SAP features: Dashboard “Search and Sort,” ability to download an application with comments, a field for Open Researcher and Contributor IDs ([ORCID's](#)) to the SAP application, and dynamic data provisioning questions within the SAP application; see [Appendix 4](#) for more information
- Reviewed designs and tested new features before launch
- Reviewed updated SAP technical requirements prior to delivery to the new vendor
- Conducted an annual review of the [SAP Data Catalog](#) to ensure that each agency’s metadata is updated and accurate

Activities in Progress

Multiple projects remain ongoing and will continue into 2026. These include expanding SAP membership, centralizing SAP services, integration with the NSDS, and transitioning to a new technical vendor.

Expanding SAP Membership

Expanding “the use of the SAP by other Executive branch agencies or organization units beyond recognized statistical agencies and units” is a goal of the SAP-GB and a milestone toward reaching the FY25-26 ICSP strategic goals for the SAP.

The SAP Budget and Policy Working Group developed a draft SAP membership application package and process for agencies to request to join the SAP for SAP-GB consideration. This draft membership document is undergoing final review with planned completion in 2026.

Centralizing SAP Services

SAP agencies are seeking efficiencies across their SAP processes and to maximize their available resources. To consider how to support agencies, the SAP-GB delegated the Budget and Policy Working Group with exploring options to centralize SAP services. Examples of centralized services could include:

- Application review
- Data curation
- Credentialing
- Ongoing Management of Projects
- Disclosure review

The Budget and Policy Working Group held an agency sharing session in late 2025, with representatives from RSAUs. The Working Group is analyzing agency input to develop recommendations to the Board.

Transition to an Enhanced SAP Portal

In 2025, NCSES recompeted and awarded the SAP technical contract, fulfilling an FY25 milestone (see [Appendix 3](#)). The new technical contract, awarded to Mathematica, kicked off in September 2025. The new vendor will develop an enhanced SAP portal that will launch at a dot gov domain in 2026. The new SAP portal will introduce significant improvements:

- **Enhanced usability and accessibility:** A more intuitive interface designed with user feedback and accessibility best practices in mind.
- **Improved performance and reliability:** Faster load times and simplified navigation.
- **Integrated support features:** Built-in help tools, knowledge base links, and contextual guidance to reduce the need for user support tickets.
- **Streamlined workflows:** Simplified forms and processes that reduce user burden and administrative overhead for the SAP PMO and participating agencies.
- **Modern technical infrastructure:** Updated architecture that supports scalability, data discoverability, and ongoing innovation.

The PMO and working groups will play key roles in transitioning to an enhanced portal:

- The TWG will provide input on design, development, and testing of the enhanced portal.
- The CWG will develop a communications plan to ensure SAP users are informed and experience a smooth transition. The CWG will also update its library of knowledge resources to support usage of the new portal.
- The PMO will serve as a liaison between the new vendor and departing vendor, ensuring migration of historical databases and metrics.

Further Integration with the National Secure Data Service

As the NSDS develops and pilots core infrastructure, the NSDS interagency working group and SAP TWG will continue their collaboration to identify additional potential opportunities to reduce burden on SAP agencies through NSDS services and to improve SAP user experience through NSDS features. To facilitate collaboration, the SAP PMO and NSDS support team developed the following plans for 2026:

- A presentation series on core NSDS services, including the Data Usage Platform and the Data Concierge Service
- Informal NSDS “Coffee Hours,” where SAP and NSDS members can ask questions and brainstorm in an open floor format
- Tailored presentations to SAP agencies interested in opting in to NSDS services – for example, by provisioning data in the NSDS secure compute environment

Challenges in 2025

Agency Pauses

In 2025, four agencies requested to temporarily pause review of their SAP applications, postpone their application window or remove assets from the SAP Data Catalog: the Bureau of Labor Statistics (BLS), the Center for Behavioral Health Statistics and Quality (CBHSQ), the National Center of Education Statistics (NCES), and the Statistics of Income (SOI) Division of IRS.

Reasons for Requested Pauses:

- *Bureau of Labor Statistics:*

In July 2025, BLS suspended access to all but six National Longitudinal Surveys of Youth (NLSY) datasets due to resource constraints; the six NLSY datasets account for approximately 80% of BLS restricted data applications. This suspension will continue as we enter FY 2026. BLS cancelled both pending and ongoing projects involving suspended datasets except for ongoing projects involving one of the Census of Fatal Occupational Injuries (CFOI) assets. Ongoing projects using the CFOI data will be allowed to continue through June 2026. BLS is currently assessing ways to re-open access to all of its restricted-use data assets in the future.

- *Center for Behavioral Health Statistics and Quality:*

In June 2025, CBHSQ requested to pause review of applications for access to restricted data from the National Survey on Drug Use and Health (NSDUH). CBHSQ requested a pause in these operations due to staffing resource limitations. This will continue as we enter FY 2026. Review of all backlogged applications in the SAP has been completed. CBHSQ is currently working to allow SAP application review to resume in the future. At this time, CBHSQ is planning to resume review of new SAP applications in mid-January 2026. Of note, CBHSQ only paused review and acceptance for new SAP applications but maintained other SAP operations, to include submission of the SAP Data Catalog and disclosure review.

- *National Center for Education Statistics:*

NCES requested a pause in review of SAP applications and some SAP operations in March 2025, due to staffing resource limitations. NCES has been able to continue to provide some support for existing approved SAP applications, such as providing disclosure review for output. This will continue as we enter FY 2026. NCES is currently working to allow for review of SAP applications to resume in the future.

- *Statistics of Income Division of IRS:*

SOI accepts applications from researchers in June of each year. In May 2025, SOI requested a pause in SAP applications. Due to a freeze on human resources (HR) functions, SOI is currently unable to initiate any Inter-Government Personnel Act agreements or begin onboarding researchers from the 2024 application cycle, which means the 2024 approved projects remain on hold. Accepting additional applications at this time would add to the projects on hold in SOI's queue. This will continue as we enter FY 2026. SOI is currently assessing ways to allow for review of SAP applications to resume in the future.

Measures for Transparency:

To enable a standard process for agencies unable to meet their obligations in the SAP, OMB developed interim guidance for affected agencies and the SAP PMO, outlining steps to ensure transparency to SAP applicants and to the public. These steps included:

- Public notification of pauses and updates: a banner on the main website of the SAP portal was added to notify the public.
- Email notifications to researchers with draft applications, proposals under review, and approved applications: the SAP PMO notified researchers in the SAP that had draft proposals and proposals under review of the pause in application review. Researchers

with approved SAP projects were also notified of potential delays in ongoing project management due to resource constraints.

- Periodic updates to OMB: Agencies and the PMO provide quarterly updates (at least every 8 weeks) to the OMB on the status of agencies' review pauses.

The PMO developed an individual memo for each impacted agency to account for their individual situation and to ensure actions were documented. M-23-04 states that in the event that an agency is noncompliant with the requirements of the SAP policy memorandum, OMB shall work with the statistical agency or unit to achieve compliance. The steps above describe OMB's work with temporarily paused agencies as they endeavor to return to full SAP operation.

Working Group Membership Constraints

Multiple agencies experienced staffing constraints, which impacted the SAP working groups' and the SAP-GB's membership.

- **Impacts:** Interagency representation is crucial to the continued success of the SAP. Perspectives, input, and expertise from multiple agencies ensure that the SAP's technical solutions are feasible and efficient for all member agencies; support development communications and knowledge resources that address user needs and serve the American public; and enable development of budget solutions and policies that responsibly manage government resources.

Pause on External Communications

In January 2025, the National Science Foundation paused external communications to the public. NCSES and the SAP, located within NCSES, accordingly paused their communications to the public. This affected the following SAP engagements and outreach channels:

- The quarterly SAP newsletter
- SAP public webinars
- SAP public listening sessions (with non-federal SAP users)
- Testing with non-federal users

The external communications pause will continue as we enter 2026.

Goals for 2026 and Beyond

As the SAP enters its third year of operation, the SAP-GB looks to enhance and expand its technical, budget, policy, and communications efforts. To meet the ICSP's strategic goals and objectives for FY 2025 and 2026, the SAP-GB developed the goals and milestones outlined in [Appendix 3](#). Achievements and progress made in 2025 are also outlined [Appendix 3](#).

Conclusion

Despite challenges encountered this year, the SAP has continued to transform the process to discover and apply for access to Federal confidential data. It has increased transparency and standardization by providing a comprehensive listing of Federal data assets through the SAP Data Catalog, implementing a standard application form, and applying common review criteria to adjudicate applications. The SAP is built on partnerships and shared expertise across the Federal statistical system and on the individual hard work of agency employees. Collaboration and consensus across agencies are key to the ongoing success of the SAP.

As the SAP enters its fourth year of operation, the SAP-GB seeks to prioritize the continued development of the SAP. Critical areas to support include expanding SAP membership to new data-providing agencies, improving the SAP portal user experience, and streamlining data security training.

The SAP-GB also looks to strengthen the SAP user community through engagement events and ensuring that users have a means to share feedback, learn from each other, and share research insights. The SAP-GB actively monitors the evolving data landscape to identify interdependencies with related efforts, such as the FSRDC program, the NSDS Demonstration, and the implementation of other Evidence Act requirements as well as additional Federal policies and regulations. The SAP-GB looks forward to and relies on the continued support of OMB and the ICSP as the SAP evolves and improves.

List of Acronyms

- **BPWG: Budget and Policy Working Group**
 - **Definition:** SAP interagency working group delegated to develop budget and policy recommendations for SAP-GB consideration.
- **CWG: Communications Working Group**
 - **Definition:** SAP interagency working group that manages stakeholder outreach and communication.
- **ICSP: Interagency Council on Statistical Policy**
 - **Definition:** Entity that supports implementation of the Federal statistical system's vision to operate as a seamless system to support evidence-based decision-making. ICSP advises the Office of Management and Budget (OMB) on SAP development and policy.
- **ICPSR: Inter-University Consortium of Political and Social Research**
 - **Definition:** A consortium within the University of Michigan and the vendor contracted to develop Research Data Gov (the web portal implementation of the Standard Application Process).
- **SAP: Standard Application Process**
 - **Definition:** A single process by which individuals may apply to access Federal restricted use data. Established in 44 USC §3583.
- **SAP-GB: SAP Governance Board**
 - **Definition:** This board serves as the executive steering committee of the SAP. It operates as a subcommittee of the ICSP.
- **SAP PMO: Standard Application Process – Project Management Office**
 - **Definition:** Provides project management support, coordination, and strategic management across the SAP effort. NCSES is designated by OMB as the PMO.
- **RSAU: Recognized statistical agency or unit**
 - **Definition:** OMB recognizes 16 statistical agencies and units under the Confidential Information Protection and Statistical Efficiency Act of 2018 (CIPSEA 2018).
- **TWG: Technical Working Group**

- **Definition:** SAP interagency working group delegated to manage technical implementation of the SAP.

Appendix 1: SAP Working Groups and Member Agencies

SAP Governance Board

- Bureau of Economic Analysis (BEA)
- Census Bureau (Census)
- Department of Education (ED)
- Economic Research Service (ERS)
- Environmental Protection Agency (EPA)
- National Center for Science and Engineering Statistics (NCSES): Co-chair
- Office of Management and Budget (OMB): Co-chair
- Social Security Administration (SSA)

SAP Technical Working Group

- Bureau of Economic Analysis (BEA)
- Bureau of Justice Statistics (BJS)
- Bureau of Labor Statistics (BLS)
- Bureau of Transportation Statistics (BTS)
- Census Bureau (Census)
- Center for Behavioral Health Statistics and Quality (CBHSQ)
- Economic Research Service (ERS)
- Energy Information Administration (EIA)
- Microeconomics Survey Unit (Federal Reserve Board) (FRB)
- National Agricultural Statistics Service (NASS): Co-chair
- National Animal Health Monitoring System (NAHMS)
- National Center for Educational Statistics (NCES)
- National Center for Health Statistics (NCHS)
- National Center for Science and Engineering Statistics (NCSES): Co-chair

- Office of Research, Evaluation, and Statistics (ORES)
- Statistics of Income Division (SOI)

SAP Communications Working Group

- Bureau of Justice Statistics (BJS)
- Bureau of Labor Statistics (BLS)
- Census Bureau (Census): Co-chair
- Department of Homeland Security (DHS)
- National Center for Science and Engineering Statistics (NCSES): Co-chair
- Statistics of Income Division (SOI)

SAP Budget and Policy Working Group

- Bureau of Economic Analysis (BEA)
- Bureau of Justice Statistics (BJS)
- Bureau of Labor Statistics (BLS)
- Census Bureau (Census)
- Energy Information Administration (EIA)
- National Center for Health Statistics (NCHS)
- National Center for Science and Engineering Statistics (NCSES): Chair

Appendix 2: Recommended Potential Intersections between the SAP portal and the NSDS

Provide customer service to SAP users through the future NSDS Data Concierge Service:

- Description: The service will help users navigate the Federal statistical system:
 - Includes AI chatbots and human experts
 - Directs users to public data when appropriate to support tiered access
 - Routes users to data tools or resources
 - Routes questions to agencies as needed
- Anticipated efficiencies and advantages:
 - Reduce burden on agencies by answering user questions pre-application
 - Promote a standardized approach for responding to user inquiries

- Make SAP (and data) more accessible to less experienced users
- Reduce unnecessary applications for confidential data by referring users to public data when appropriate for data user needs
- Planned next steps:
 - Develop, train, and test the data concierge service with SAP agencies and users

Enable SAP agencies to provision data to approved users through the NSDS secure compute environment:

- Description:
 - A virtual secure environment, with a pipeline into a high-performance computing environment.
 - FedRAMP moderate environment with an NSF authority to operate to meet the IT security requirements for agencies with a wide range of statutes including CIPSEA, Title 13, Title 26, HIPAA, etc.
 - Not meant to be a data warehouse, although some data storage is required especially if used as an agency data enclave in the future.
- Anticipated efficiencies and advantages:
 - Provides a virtual access option for agencies who only offer on-site access.
 - Provides an access option for agencies who do not have their own enclave.
 - Provides an array of tools that may be unavailable in other environments.
 - Provides secure partitioned project spaces that allow for secure data access for approved users on approved projects.
- Planned next steps:
 - Test with interested agencies

Streamline data sharing through establishing a legal community of practice:

- Background: Legal agreements pose major challenges to interagency data linkage. When possible, legal agreements are time-consuming and resource intensive.
- Description: Develop an interagency community of practice for legal teams involved in data sharing. This could enable grassroots buy-in on streamlined data sharing.
- Anticipated efficiencies and advantages:
 - Gain buy-in from legal teams on streamlining data sharing
 - Work across agencies to implement presumption of accessibility regulation
 - Build grassroots support for increased data sharing
 - Move from a culture of risk aversion to risk mitigation
- Potential Next steps:
 - Recruit members – issue call to participate
 - Establish guiding principles and set goals for working group

- Set up regular meeting cadence

Appendix 3: Goals and Milestones to Meet ICSP Strategic Objectives

To meet the ICSP's [strategic goals and objectives](#) for Fiscal Years 2025 and 2026, the SAP-GB developed the goals and milestones below.

General

Goal: Deliver annual SAP reports ...

- **Milestone:** ... for Year 2 and 3 of SAP portal operation
- **Status:** Complete

Technical

Goal: Support SAP portal site enhancements via...

- **Milestone:** ...recompeting and awarding the SAP portal technical contract
- **Status:** Completed in 2025
- **Milestone:** ...transitioning to a dot gov web domain and rebrand the SAP site
- **Status:** Future task for 2026
- **Milestone:** ...technical functionality enhancements to comply with SAP policy, improve search and discovery, and increase overall usability
- **Status:** Completed in 2025; further improvements planned for 2026

Goal: Integrate with related data ecosystem efforts by...

- **Milestone:** ...providing recommendations to establish interconnections between the SAP portal and the NSDS, in coordination with the S-NSDS
- **Status:** Completed in 2025; further exploration planned for 2026
- **Milestone:** ...providing recommendations to enable currently unsupported multi-agency linkage projects requested through the SAP via the NSDS, the FSRDC, and/or other agencies
- **Status:** Future task for 2026

Goal: Enhance SAP portal user experience by...

- **Milestone:** ...conducting usability and cognitive testing on existing and new features
- **Status:** Future task for 2026

Budget and Policy

Goal: Expand agency participation in the SAP by...

- **Milestone:** ...approving an SAP membership application package and opening SAP membership to additional agencies
- **Status:** Future task for 2026

Goal: Support SAP resource needs by...

- **Milestone:** ...developing SAP budget recommendations, incorporating input from agencies
- **Status:** Future task for 2026

Goal: Streamline the security credentialing experience by...

- **Milestone:** ...investigating and integrating agency data security training requirements
- **Status:** Future task for 2026

Communications

Goal: Build SAP user community via...

- **Milestone:** ...an SAP Research Symposium and community of practice website
- **Status:** Future task for 2026
- **Milestone:** ...engaging users to obtain feedback through a series of 4 SAP listening sessions
- **Status:** Paused in 2025; Future task for 2026

Goal: Promote transparency through...

- **Milestone:** ...enhanced publicly available metrics, aggregate and by agency
- **Status:** In progress; aggregate metrics released in 2025, and agency metrics to be released in 2026

Appendix 4: List of SAP Portal Features Released in 2025

Feature 1: Dashboard “Search and Sort”

- **Description:** SAP reviewer and applicant dashboards now have the ability for the user to search and sort applications. This is a major usability enhancement, in particular for agencies who receive hundreds of applications.

- **Rationale:** Usability

Feature 2: Ability to download an application with comments

- **Description:** SAP reviewers can download an application with comments from other reviewers. This facilitates offline review with relevant agency staff and enables reviewers to collaborate more easily.
- **Rationale:** Usability

Feature 3: Adding a field for ORCIDs to the SAP application

- **Description:** The SAP application now includes a field where applicants can enter their ORCID.
- **Rationale:** Usability

Feature 4: Dynamic data provisioning questions within the SAP application

- **Description:** Data provisioning questions (such as whether datasets are provisioned by year, by a range of years, by a geographic region, or by another variable such as a crop) now dynamically update within the application based on the datasets researchers have selected. This dramatically reduces user error and minimizes unnecessary back and forth with agencies.
- **Rationale:** Usability

Appendix 5: Breakdown of SAP Newsletter Subscribers

The SAP newsletter has 5828 subscribers. Of those subscribers,

- 2643 have an email address ending in a .com domain.
- 2302 have an email address ending in an .edu domain.
- 324 have an email address ending in a .gov domain.
- 259 have an “Other” email domain
- 215 have an email address ending in a .org domain.
- 58 have an email address ending in an international .edu domain (.edu.xx or .ac.xx)
- 14 have an email address ending in a .mil domain (not pictured in Figure 9)
- 13 have an email address ending in a government international (.gov.xx) domain (not pictured in Figure 9)

Individuals can subscribe to the SAP newsletter on the [SAP website](#).

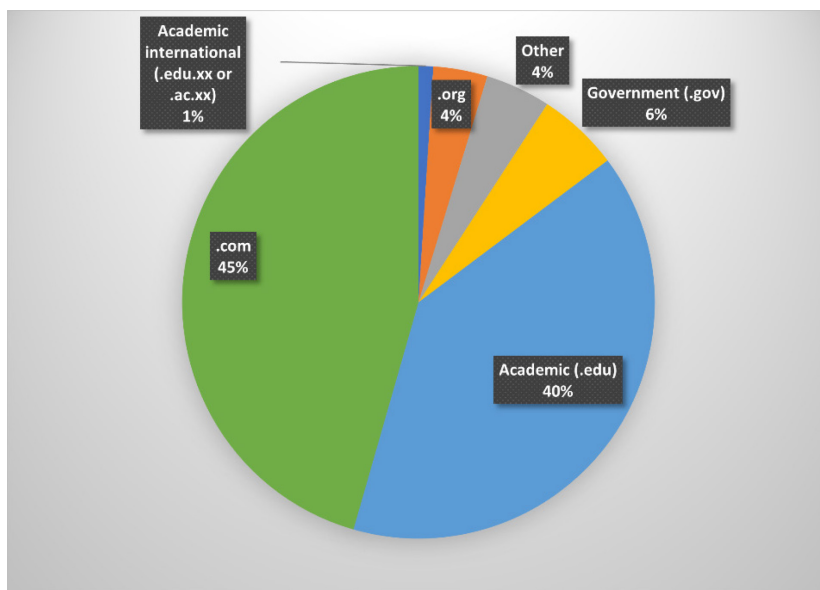


Figure 9: SAP subscribers broken down by email domain