

# Memorandum

To: All Employees

From: Vipin Arora, Director Date: December 19, 2025

# Purpose

The purpose of this memorandum is to provide information on protecting Bureau of Economic Analysis (BEA) economic data from being compromised by an unauthorized or inadvertent release prior to the scheduled release time. This memo organizes, updates, and clarifies the longstanding security procedures at BEA.

# **Procedures**

At BEA, strict procedures are followed to ensure data are not disseminated before the official release time, except as authorized under Office of Management and Budget (OMB) Statistical Policy Directive Nos. 3 and  $4.^{1}$ 

To protect its sensitive estimates and to ensure timely and simultaneous release to the public, BEA and its employees must:

- 1) Limit access to pre-release data and estimates to those with a clear need to know.
- 2) Provide and follow physical and computer security protections and procedures necessary to limit access to those with a need to know.
- 3) Ensure no BEA employee uses (or gives the appearance of using) pre-release information for personal gain.
- 4) Release the data according to an announced schedule that minimizes the risk of pre-release access and instills confidence in the integrity of the data.

## Details of the Procedures

1) Limit access to pre-release data and estimates to those with a clear need to know.

Minimizing the number of individuals with access to a pre-release estimate minimizes the risk of unauthorized or inadvertent pre-release disclosure.

<sup>&</sup>lt;sup>1</sup> For example, following OMB Statistical Policy Directive No. 3, BEA provides pre-release Principal Federal Economic Indicator (PFEI) information to the President, through the Chair of the Council of Economic Advisers, as soon as it is available, and OMB Statistical Policy Directive No. 4 allows for providing pre-release access to non-PFEI data in certain circumstances under an embargo.



#### Who has a need to know?

To accomplish this, all BEA employees must have access only to such protected information necessary to successfully perform the work for which they are responsible. This means BEA employees in the production process must have access only to the protected information necessary to prepare their estimate or lower-level aggregates. This may include estimates for other related components of gross domestic product (GDP) or other statistics, for example, that would help in understanding and estimating their own component. Then, as the review process moves to higher levels within BEA, only those individuals with a need to know will have access to the more comprehensive aggregates. The estimates are reviewed for accuracy and consistency at each level of the organization producing the estimates and by BEA senior management.

In addition, pre-release or confidential data provided to BEA under an agreement with another agency, or collected by BEA under an obligation to protect the information, should only be accessed by BEA employees with a need to know that information to successfully perform their work.

# How must those with a need to know work with others?

BEA employees must not reveal or disclose any estimates, or how source data affected an estimate, to anyone other than an authorized employee. Employees must not discuss projections of missing source data for a forthcoming estimate with anyone other than authorized BEA employees before the estimate is officially released to the public. BEA employees must follow best practices for the stewardship of protected or confidential data. For example, employees must be conscious of inadvertent disclosure through conversations (direct or overheard) as well as data visible on a computer screen in any work location. Contractors, unless authorized by BEA's Director or Deputy Director, must never be allowed to view or receive information about sensitive data.

#### Following the official release:

Authorized BEA employees can discuss the estimates released to the public with external parties, but only within the context of the publicly released material. BEA employees cannot reveal or discuss externally how released data may affect other BEA estimates that have not been released. For example, the impact on estimates of GDP of exports, imports, or their components released as part of the monthly U.S. international trade in goods and services accounts cannot be revealed or discussed externally by BEA employees until after the official release of the GDP estimates.



2) Provide and follow physical and computer security protections and procedures necessary to limit access to those with a need to know.

Physical and information technology (IT) security protections are essential for ensuring no unauthorized persons can access sensitive pre-release or confidential data. Below are the physical and computer security procedures all BEA employees must follow. There may be additional restrictions or procedures that apply to some protected or confidential data (such as confidential data received by BEA from another agency) in addition to those listed below, and BEA employees must adhere to those additional restrictions and procedures.

# Physical security

BEA regularly reviews the physical access list for its office building and has restrictions for entering the building and accessing BEA space, allowing access only to those approved on the physical access list. All outside visitors must always be escorted when in BEA office space.

Printed materials of sensitive pre-release economic statistics, source data, or any other protected or confidential data must be stored in a locked office or locked container, such as a file drawer or safe. When employees have finished working with printed sensitive materials, the materials must be stored in a locked container, within a locked office, or placed in a secure bin to be shredded.

#### *IT security*

BEA's IT systems employ effective barriers to restrict access to only BEA employees with a need to know. BEA has in place strict security policies, configurations, and controls to limit logical access to data storage assets containing sensitive pre-release or confidential data and to ensure these data are used only for statistical purposes. A list of authorized employees must be maintained and regularly monitored, and authorization for access to network locations must be removed as soon as an employee no longer has a need to know for the data stored in that location.

All BEA information systems must ensure security policies, configurations, and controls are appropriate for the full data lifecycle, including data used for artificial intelligence/machine learning (AI/ML) model training, inference, and storage. Special attention must be given to the risk of re-identification or disclosure through AI/ML inputs or outputs. Statistical disclosure limitation techniques must be applied.

Additionally, BEA employees must remove their PIV cards from their computers, thereby invoking a password-protected screen saver, prior to leaving the computer unattended. All sensitive data and materials are stored within BEA's secure network environment and must not be stored on an unencrypted or personal laptop or removable media, such as thumb drives. In addition, sensitive data must never be sent in the body of or attached to an email. If necessary, BEA employees may use the authorized, secure, encrypted email application to send sensitive data in accordance with BEA policy.



3) Ensure no BEA employee uses (or gives the appearance of using) pre-release information for personal gain.

Use of government information for personal gain is prohibited under federal law, and federal ethics laws are designed to prevent the appearance that governmental information is used for personal gain. BEA will immediately take steps to remove any employee from federal service who uses pre-release information for personal gain. Once an employee knows a component of or the high-level aggregate for a Principal Federal Economic Indicator (PFEI), the employee must refrain from entering into financial transactions to avoid the appearance of personal gain until after the indicator is published. Financial transactions include, but are not limited to, transactions involving stocks, bonds, derivative instruments, loan commitments, and foreign currency transactions. (Should this restriction present a problem, an employee must notify their supervisor prior to gaining access to a component of or high-level aggregate for a PFEI.)

Employees are also prohibited from using information pertaining to any of BEA's sensitive economic statistics to secure gains for friends, relatives, or any other persons. Additionally, personal aggrandizement through the release of such information to the press, private entities (e.g., research organizations or investment companies), or to senior officials is prohibited.

4) Release the data according to an announced schedule that minimizes the risk of pre-release access and instills confidence in the integrity of the data.

# Release schedule

In accordance with OMB directives, BEA publishes the release dates for its regular and recurring releases for the forthcoming calendar year in advance of the start of that calendar year. <sup>2</sup> Release dates and times for BEA's five PFEIs are published each year in September by OMB, along with the release dates for all PFEIs produced by other agencies. <sup>3</sup> BEA also publishes a schedule of all its news releases, including national, international, and regional accounts estimates, for the upcoming year on its website, www.bea.gov. Each BEA news release also includes the time and date of the next release. In addition, the release schedule on BEA's public website includes days and times for data releases that are not in news release formats, such as data-only releases on the website, *Survey of Current Business* articles, and select data visualizations.

<sup>&</sup>lt;sup>2</sup> Changes in the release schedule may occur only if special unforeseen circumstances arise, and they must be announced and fully explained as soon as it has been determined the changes are unavoidable. BEA must notify the Chief Statistician of the United States if a release date is changed after the schedule has been published, as required by OMB's Fundamental Responsibilities of Recognized Statistical Agencies and Units Regulation.

<sup>&</sup>lt;sup>3</sup> PFEI release schedules are available at <a href="https://www.whitehouse.gov/omb/information-regulatory-affairs/statistical-programs-standards/">https://www.whitehouse.gov/omb/information-regulatory-affairs/statistical-programs-standards/</a> and <a href="https://www.statspolicy.gov/policies/">https://www.statspolicy.gov/policies/</a>.



## Disseminating statistics and pre-release access

Authorized BEA employees responsible for disseminating the Data Application Programming Interface (API) follow the strict procedures for all news releases to ensure no unauthorized or inadvertent pre-release access of the statistics occurs. BEA also has protections in place, such as cybersecurity measures to avoid denial-of-service attacks, to ensure data is disseminated to the public on schedule and on time.

BEA is authorized by OMB directives to share pre-release statistics under certain circumstances. In accordance with OMB's Statistical Policy Directive No. 3, pre-release access to PFEIs is provided to the President through the Chair of the Council of Economic Advisers as soon as the estimates for PFEIs have been approved and finalized and final versions of materials for public release have been prepared. In addition, the BEA Director may grant pre-release access in a secure environment to the Under Secretary for Economic Affairs and other Commerce Department policy officials up to 30 minutes ahead of the official release time. These officials must be fully informed of and agree to the conditions to ensure there is no unauthorized dissemination or use prior to the release. No external communication of the pre-release information is allowed until after the public release. All employees of the Executive Branch must not comment publicly on the data until at least 30 minutes after the official release time.

Under certain and extremely limited situations, the Director or Deputy Director may authorize the disclosure of data prior to their release to government policy officials or representatives of the news media on an embargoed basis in compliance with OMB directives. The individuals receiving the data must be listed in a log by name, data item name, and time when the data were provided, which may not be more than 30 minutes ahead of the official release time, if it is a PFEI. The data are provided on an embargoed basis until the official release time. The Director or Deputy Director must ensure any person granted access has been fully informed of and agreed to the condition that there is no unauthorized dissemination or use of the data prior to its official release.

#### Answering questions from the public

In the days leading up to a release, BEA employees cannot discuss or speculate about what the still-unreleased numbers may or may not look like. After the release is public, authorized BEA employees may field questions from the public about the data in the release. For any release, BEA employees must verify the release is publicly available prior to answering any questions to prevent an inadvertent disclosure of pre-release information. BEA employees are trained to answer public inquiries, especially those from the media, and ensure that answers point to the publicly available information. That is, BEA employees provide the source of the information and are not themselves the source of the information. BEA designates specific employees as authorized media contacts, and those employees must take annual training on how to handle media inquiries. Other BEA employees are also trained regularly on BEA's media policy.

<sup>&</sup>lt;sup>4</sup> BEA employees who have been designated by the BEA Director to provide technical explanations of the data may speak with the public immediately after the release.



# Conclusion

The procedures outlined in this memorandum have been developed and updated across decades to ensure continued trust in the statistics produced by BEA, as the landscape for completing such work continues to evolve. BEA holds its employees accountable to these procedures through formal annual training and performance requirements.