
Centers for Disease Control-National Center for Health Statistics

Draft Guidelines for Ensuring the Quality of Information Disseminated to the Public

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I. Agency Mission

The National Center for Health Statistics (NCHS), a component of the Centers for Disease Control and Prevention (CDC), is one of the federal statistical agencies belonging to the Interagency Council on Statistical Policy (ICSP). The ICSP, which is led by the Office of Management and Budget (OMB), is comprised of the heads of the nation's ten principal statistical agencies plus the heads of the statistical units of four non-statistical agencies. The ICSP coordinates statistical work across organizations, enabling the exchange of information about organization programs and activities, and provides advice and counsel to OMB on statistical activities. The statistical activities of these agencies are predominantly the collection, compilation, processing or analysis of information for statistical purposes. Within this framework, NCHS functions as the federal agency responsible for the collection and dissemination of the nation's vital and health statistics. Its mission is to provide statistical information that will guide actions and policies to improve the health of the American people.

To carry out its mission, NCHS conducts a wide range of annual, periodic, and longitudinal sample surveys and administers the national vital statistics systems. As the nation's principal health statistics agency, NCHS leads the way with accurate, relevant, and timely data. To assure the accuracy, relevance, and timeliness of its statistical products, NCHS assumes responsibility for determining sources of data, measurement methods, methods of data collection and processing while minimizing respondent burden; employing appropriate methods of analysis, and ensuring the public availability of the data and documentation of the methods used to obtain the data. Within the constraints of resource availability, NCHS continually works to improve its data systems to provide information necessary for the formulation of sound public policy. As appropriate, NCHS seeks advice on its statistical program as a whole, including the setting of statistical priorities and on the statistical methodologies it uses. NCHS strives to meet the needs for access to its data while maintaining appropriate safeguards for the confidentiality of individual responses.

II. Scope and Applicability of Guidelines

The guidelines cover all NCHS statistical and analytic information products originated by the agency, except as specified below:

Documents not authorized by NCHS (either directly or by contract) and not representing official views, including research supported by NCHS funding;

Archival information disseminated by NCHS;

Information dissemination limited to government employees or agency contractors or grantees;

Information intended solely for intra- or inter-agency use or sharing of government information, such as evaluation of a specific methodological approach to assess success in achieving its objectives;

Information for public filings, subpoenas, or adjudicative processes;

Opinions where the presentation makes it clear that what is being offered is personal opinion rather than fact or the agency's views.

III. Types of Information Disseminated by NCHS to the Public

NCHS disseminates a variety of statistical and analytic information products. These include: statistical reports on topics such as births, deaths, life tables, health status, health services utilization and the provision of health care; statistical tabulations; publications in its "Healthy People 2010" series; "Health, US," the Secretary's annual report to the Congress; and public and restricted use data files. NCHS also disseminates the results of epidemiologic, demographic and methodological research.

IV. Types of Dissemination Methods

NCHS statistical and analytic information products are distributed in one or a combination of the following media:

Print-publications, reports, books, brochures, and pamphlets.

Electronic-the NCHS website, CD ROMS, listservs, e-mail, automated voice and fax systems, hotlines and clearinghouses.

Oral-speeches, presentations, commentaries for publication or broadcast, etc.

Audio-Visual-broadcast scripts, audio or videotapes, and videocasting.

V. Agency Quality Assurance Policies, Standards and Processes for Ensuring the Quality of Information Dissemination to the Public

NCHS is recognized as one of the major statistical agencies in the federal government. In developing its statistical and analytic information products, NCHS routinely employs a number

of widely accepted methods and procedures for ensuring quality, including independent assessments of statistical methodologies and observance of professional standards. In order to ensure the utility of its statistical and analytic information products, NCHS conducts independent research and consults with experts in areas such as data collection, data analysis and a variety of substantive topics and issues. Additionally, NCHS maintains ongoing contact with users, and participates in conferences, workshops, etc., in order to objectively assess and identify the current and future data needs of NCHS constituents. Further, NCHS employs a wide variety of dissemination mechanisms to make its statistical and analytic information products widely available and broadly accessible.

In order to assure the objectivity of its statistical and analytic information products, i.e., that they are accurate, reliable, and unbiased, NCHS obtains these data through accepted statistical theory and practice. Dissemination of data also follows generally recognized guidelines in terms of defining acceptable standards regarding minimum response rates, maximum standard errors, cell size suppression, quality of coding and other processing operations. NCHS also maintains staff expertise in areas such as concept development, survey planning and design (including questionnaire development and testing), data collection, data processing and editing, data analysis, evaluation procedures, and methods of dissemination.

NCHS assures the security of its statistical and analytic information products through the enforcement of rigorous controls that protect against unauthorized access to the data, revision or corruption of the data, or unauthorized use of the data. Some of the major controls used at NCHS include access control, user authentication, encryption, access monitoring, provision of unalterable electronic content, and audit trails.

All NCHS statistical and analytic information products, except oral presentations, undergo a formal clearance process before dissemination. Publications and reports, whether in electronic or paper form, are reviewed by a designated official within the author's office or division and by the Associate Director for Science (ADS). These reviews cover the clarity of descriptive text, the appropriateness of the methodology, the soundness of the analysis, the adherence to confidentiality and disclosure avoidance restrictions, the readability of tabular and graphic presentations of data, etc. Finally, all products undergo editorial review (e.g., formatting, proofreading, spell checks, proper punctuation, etc.,) In addition, all public use tapes are reviewed for accuracy and appropriate confidentiality protections. Oral presentations are often, but not always, subject to supervisory review.

NCHS statistical and analytic information products are derived using generally acceptable statistical practices and methodologies which are well documented and available to the public. These procedures enable responsible statisticians and analysts outside of NCHS to replicate the NCHS statistical methods and obtain results consistent with those obtained by NCHS.

VI. Agency Administrative Complaint Procedures

A. Responsibility of the Complainant

To seek a correction under Section 515 of Public Law 106-554 of information disseminated by NCHS, individuals should follow the procedures described below. 1) A complaint or request for review and correction of information shall be in written hard copy or electronic form; 2) it shall be sent to NCHS by mail or electronic-mail (e-mail); and 3) it shall state that a request for correction of information is being submitted under Section 515 of Public Law 106-554. The

complaint shall contain 4) a detailed description of the specific material that needs to be corrected, including where the material is located, i.e., the publication title, date, and publication number, if any, or the website and web page address (url), or the speech title, presenter, date and place of delivery; 5) the specific reason(s) for believing the information is in error and supporting documentation, if any; 6) the specific recommendations for correcting the information; 7) a description of how the complainant is affected by the information error; and 8) the name, mailing address, telephone number, e-mail address, and organizational affiliation, if any, of the complainant.

The complaint or request for review and correction of information shall be addressed to:

Dr. Jennifer Madans,
Associate Director for Science, NCHS.

Dr. Madans may be contacted by e-mail at JMadans@cdc.gov. Her mailing address is

National Center for Health Statistics,
6525 Belcrest Road, Room 1140,
Hyattsville, MD 20782.

B. Responsibility of NCHS

Based on a review of the information provided, NCHS will determine whether a correction is warranted and, if so, what action to take. NCHS will respond to the requester by letter or e-mail. The NCHS response will explain the findings of the review and the actions that it will take, if any. The response will consider the nature and timeliness of the information involved and such factors as the significance of the correction on the use of the information and the magnitude of the correction. The response will describe how the complainant may request reconsideration. NCHS will respond to all requests for correction within 45 working days of receipt. If the request requires more than 45 working days to resolve, NCHS will inform the complainant that more time is required and indicate the reason(s) why. NCHS will also provide an estimated decision date.

C. Appeals

If the complainant does not agree with the NCHS decision (including the corrective action, if any), the complainant may send a written hard copy or electronic request for reconsideration within 30 days of receipt of the NCHS decision. The appeal shall state the reason(s) why the NCHS response is insufficient or inadequate. Complainants shall attach a copy of their original request and the NCHS response to it, clearly mark the appeal with the words, "Information Quality Appeal," and send the appeal to the NCHS appeals address, which will be included in the NCHS response.

The NCHS official who reviewed the original complaint will not have responsibility for responding to the appeal.

VII. Influential Scientific, Financial and Statistical Information

NCHS statistical and analytic data information products are used extensively to evaluate and profile the health of the American people. Often, findings from NCHS surveys serve as

benchmarks for investigating the need to modify or implement policies that will affect initiatives addressing specific health concerns of the United States population or specific health concerns of certain population sub-groups. In recognition of the potential impact some of its statistical and analytic data products may have on health policy and initiatives, NCHS requires that these products meet the highest possible quality standards. In order to accomplish this goal, quality standards are embedded throughout all survey processes and procedures, beginning with the conceptualization and design of a survey, through to data dissemination. The appropriateness of many of these standards is measured by independent assessments (e.g., peer review) conducted by qualified persons. Further, NCHS strives to assure that its processes and procedures are appropriate, well documented, and capable of being replicated by qualified persons outside of NCHS in order to derive results consistent with those obtained by NCHS. Whenever confidentiality restrictions preclude the general availability of NCHS data sets, methodologies, etc., NCHS makes every effort to provide qualified researchers limited access to confidential files through its Research Data Center, which was established specifically for that purpose.

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