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## H. Indian Health Service

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

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#### I. Agency Mission

The Indian Health Service (IHS) is responsible for providing federal health services to American Indians and Alaska Natives. The IHS provides a comprehensive health services delivery system for American Indians and Alaska Natives with opportunity for maximum tribal involvement in developing and managing programs to meet their health needs. The goal of the IHS is to raise the health status of American Indian and Alaska Native people to the highest possible level. IHS services are provided directly and also through tribally contracted and operated health programs.

#### II. Scope and Applicability of Guidelines for IHS

The OMB guidelines apply only to the dissemination of substantive information that the IHS initiates or sponsors. The IHS information to which these guidelines would apply are programmatic statistics and IHS program and policy information.

##### A. Information that is subject to the Information Quality Guidelines includes:

- Statistical clinical information
- Actuarial information
- Epidemiological information
- Studies and summaries prepared for public dissemination to inform the public about the impact of IHS programs
- Studies and summaries prepared for use in formulating broad program policy

##### B. Information that is not subject to the Information Quality Guidelines includes:

- Personal information received as a result of agency adjudicative decisions
- Information pertaining to basic agency operations
- Program publications, such as pamphlets and notices, that describe Area and regional programs
- Clinical program information
- Information on how to apply for third party program benefits
- Procedural and policy manuals
- Management information that is produced primarily for internal use
- Press Releases

### **III. Types of Information Disseminated by the IHS to the Public**

IHS disseminates statistical reports and IHS policy and programmatic information to the public via the IHS web site and through IHS publications. The IHS website also contains links to other useful sites relating to health information and IHS related activities. The Indian Health Service (IHS) provides information to the public about the current IHS programs, clinical epidemiological data on American Indian and Alaska Natives(AI/AN), the projected scope and impact of IHS programs of AI/AN people in the future, and the effect of proposed changes to the IHS and tribal health care systems. Information products describe the impact of IHS programs on American Indian and Alaska Natives communities and upon its beneficiary populations. IHS provides detailed demographic and economic information on health benefits for AI/AN people. The IHS also provides information on research among AI/AN communities. IHS information products are used by government planners and policymakers as well as many actuaries, economists and other social scientists, the media and the public to analyze IHS programs and their impact on the health of the Indian Nation.

### **IV. Types of Dissemination Methods**

IHS disseminates information in print and electronic form.

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

#### **A. Administrative and program data:**

Information is provided by tribal governments in the form of program data, reporting requirements, performance reports and progress reports. This information is often compiled and aggregated by IHS and is subject to a series of internal quality reviews prior to any dissemination to the public. Tribal governments may conduct internal reviews in order to provide data that are accurate, consistent, and complete.

#### **B. Reports, publications, and other products:**

IHS publications are required to be consistent with government-wide and HHS public affairs policies. IHS has guidelines which closely follow the regulations described in the HHS Public Affairs Management Manual and Government Printing and Binding Regulations to assist program staff in obtaining appropriate review and clearance of information products.

#### **C. Statistical data disseminated to the public:**

For IHS demographic and statistical information, IHS uses widely accepted standards for descriptive and analytical statistics to ensure data quality. The IHS statistical program conducts a standard review to ensure data quality, completeness, and reliability. The review includes the reliability of data sources and soundness of statistical methods and presentation.

Information released by IHS is developed from reliable data sources utilizing accepted methods for data collection. The information is based on thoroughly reviewed analyses and models. The guidelines below describe procedures that IHS employs to assure the quality of its information products, including their utility, objectivity, integrity, transparency, and reproducibility.

#### **D. Utility**

Utility involves the usefulness of the information to its intended users. Utility is achieved by staying informed of information needs and developing new data, models, and information products where appropriate. Based on internal analyses of information requirements, convening and attending conferences, working with advisory committees, and sponsoring outreach activities, IHS keeps abreast of information needs with respect to the analysis of IHS programs. To the extent possible, we base our analysis on IHS administrative data and surveys by other federal agencies or established survey organizations. When major needs for data related to IHS populations are identified, IHS conducts special-purpose surveys to address these needs or assigns the task to its sister agencies in the Department of Human Services to assist in obtaining the needed data.

IHS's ongoing publication series and other information products are reviewed to ensure that they remain relevant and address current information needs. Based on internal product reviews, consultation with users, and in response to changing needs and emphases, content of ongoing information products is changed, new products are introduced and others discontinued. IHS prepares special Clinical Trends reports and topical studies that address emerging information needs stemming from data coming from the agency clinical services. It also addresses proposed changes in the law and related policy debates. IHS also identifies requirements for simulation models to support the preparation of analytic reports and policy studies and modifies its current models or develops new models accordingly. Where appropriate, contact information is available on each publication (and in some cases on each table of a publication) to allow feedback and questions by users. In addition, IHS's Office of Program Support has recently begun a periodic customer satisfaction survey to obtain input and guidance by users.

#### **E. Objectivity**

Objectivity involves a focus on ensuring that information is accurate, reliable and unbiased and that information products are presented in an accurate, clear, complete and unbiased manner. Objectivity is achieved by using reliable data sources and sound analytical techniques, and preparing information products that use proven methods by qualified people that are carefully reviewed

Much of the information disseminated by IHS is based on patient data files. These files contain information used to manage IHS programs, including data to determine benefits, and plan for improving the health of the American Indian and Alaska Native people IHS's Office of Public Health conducts ongoing reviews of data and information in IHS data systems to ensure its

accuracy. In support of these activities, IHS employs an outside contractor to review IHS's quality control methodology and processes to confirm the validity of its data management processes. IHS administrative data are also covered under IHS Financial Management System and conform to the high standards of financial accountability demanded by these Systems. These financial management systems are mandated by the Office of Management and Budget and are designed to provide complete, reliable, consistent, timely and useful management information to enable agencies to carry out their fiduciary responsibilities.

IHS-sponsored surveys are conducted using methodologies that are consistent with generally accepted professional standards for all aspects of survey development, including sample frame development, statistical design of the survey sample, questionnaire design and testing, data collection, sampling and coverage errors, non-response analysis, imputation of missing data, weights and variance estimates. IHS surveys follow guidelines and policies set forth in the Paperwork Reduction Act and other regulations related to the conduct of government surveys. IHS also prepares information products using data produced or maintained by other federal agencies and established survey organizations. All such external survey and administrative data used by IHS are produced using generally accepted methodologies.

Where samples from administrative data files are employed for analysis, sound statistical methods are employed to develop samples. Staff producing statistical publications are knowledgeable about the content, structure and limitations of the administrative data files and maintain working relations with staff who create, update and maintain these files.

## **F. Use sound analytic techniques**

Analytical reports are prepared using a variety of analytical techniques from simple tabulations and descriptive summary statistics to multivariate statistical methods and econometric models. Analytical techniques are reviewed for their appropriateness to the data and the analysis being conducted and are clearly identified in reports.

IHS utilizes several simulation models to make estimates of the effects of demographic and economic trends and legislative and policy options on Indian Health programs and beneficiary populations now and in the future. Some simulation models have been or are being developed within IHS. Others are being developed under contracts. All contracts to develop simulation models provide for detailed documentation that describes the goals and objectives of the model, the data sources being used and the methodologies and assumptions employed. Contract reports are being made available on the Internet. Documentation is available for some simulation models that have been developed within IHS and will be prepared for others.

All simulation models are extensively tested and reviewed within IHS to verify that the computer programs that were developed to implement the model conform to the stated objectives. Where appropriate, historical simulations are developed to evaluate the success of a model in producing reasonable projections. Simulation models are based on IHS's and its contractor's best judgements of current and future behavioral relationships and methods of projecting key program outcomes. These models are periodically updated to reflect input from internal and external reviews and research findings on behavioral relationships. These updates are also documented.

## **G. Preparation of statistical data products**

Estimates in statistical data products are prepared from representative samples of IHS data files and from reliable external data sources. Procedures for collection of data from administrative files and linking external data files to administrative data files are prepared using accepted statistical methods. Output is reviewed by knowledgeable staff within the originating component and across components as appropriate. Estimates are compared to prior year estimates and estimates from other sources to ensure consistency, reasonableness and reliability. All data sources used in producing statistical data products are identified, either for the publication as a whole or for individual tables. Documentation includes specification of variables used, definitions of variables when appropriate, sampling errors and disclosure avoidance rules or techniques

## **H. Preparation of analytical reports and policy studies**

Information contained in analytical reports and policy studies is based on estimates derived from reliable administrative data files and external data sources. Analysts apply sound statistical and analytical techniques and are knowledgeable about the data sources and models being used. All data sources are identified. When analyses are based on simulation model projections, the assumptions used to produce the projections are also identified as well as the rationale for the assumptions used and the impact of using alternative assumptions. All analytic reports and policy studies are reviewed by technically qualified staff to ensure that analysis is valid, complete, unbiased, objective and relevant. Analytic reports and policy studies that are considered to be more technically complex are also reviewed by subject matter experts outside of the originating component to provide additional perspective and expertise

## **I. Editorial review for accuracy and clarity of information in publications**

All information products are edited and proofread before release to ensure clarity and coherence of the final report. Text is edited to ensure that the report is easy to read and grammatically correct thoughts and arguments flow logically, and information, is worded concisely and lucidly. Tables and charts are edited to ensure that they clearly and accurately illustrate and support points made in the text, and include concise but descriptive, titles. Tables and charts clearly indicate the unit of measure and the universe being examined and all internal labels (column heads, row stubs, and panel headings) should accurately describe the information they contain. All changes made to a manuscript during the editing process are checked by a proofreader and reviewed and approved by the author.

If an error is detected before an initial mailing, IHS includes an errata notice with the mailing. If the mailing has been sent out, IHS issues an errata sheet with all subsequent publications, and as appropriate, sends the errata sheet to all those who received the initial notice. Errata notices are put on the first page of the Web version to inform both new and repeat site visitors about the mistake, and the corrected version of the document is posted on the Web.

## **G. Integrity**

Integrity refers to the security of information from unauthorized access or revision to ensure that the information is not compromised through corruption or falsification. To ensure the integrity of its administrative information, IHS has in place rigorous controls that have been identified as representing sound security practices.

IHS is highly protective of the confidentiality of information it holds through its policies and practices. IHS has in place programs and policies for securing IHS resources as required by the Government Information Security Reform Act (P.L. 106-398, Title X, Subtitle G). These security procedures address all major components of information security and apply to all IHS operating components.

IHS is subject to statutory requirements to protect the sensitive information it gathers and maintains on individuals. These requirements are contained in the following documents:

- **Privacy Act of 1974**
- **Computer Security Act of 1987**
- **Office of Management and Budget (OMB) Circulars A-123 A-127 and A-130**
- **Government Information Security Reform Act**
- **Federal Managers' Financial Integrity Act (FMFIA) of 1982 .Section 6103 of the Internal Revenue Code .Section 1106 of the Social Security Act**
- **IRS Tax Information Security Guidelines for Federal, State and Local Agencies**

## **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 the IHS, individuals should follow the procedures described below. A) A complaint or request for review and correction of information should be in written hard copy or electronic form; B) it should be sent to the agency by mail or electronic-mail (e-mail); and C) it should state that a request for correction of information is being submitted under Section 515 of Public Law 106-554.

The complaint should contain D) a 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; and E) the specific reasons for believing the information is in error and supporting documentation, if any; F) the specific recommendations for correcting the information; G) a description of how the person submitting the complaint is affected by the information error; and H) the name, mailing address, telephone number, e-mail address, and organizational affiliation, if any, of the individual making the complaint.

Complaints by mail should be directed to:

**Indian Health Service  
Data Quality Management  
801 Thompson Avenue  
Rockville, MD 20852**

IHS also will establish an email address on the IHS website for receipt of formal complaints via electronic mail.

e-mail: [officename@hqe.ihs.gov](mailto:officename@hqe.ihs.gov)

### **B. Responsibility of the Agency**

Based on a review of the information provided, IHS will determine whether a correction is warranted and if, so what action to take. The agency will respond to the requestor by letter or e-mail. The IHS response will explain the findings of the review and the actions that the agency 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. The agency will respond to all requests for correction within 45 working days of receipt. If the request requires more than 45 working days to resolve, the agency will inform the complainant that more time is required and indicate the reason why and an estimated decision date.

### **C. Appeals**

If the individual submitting the complaint does not agree with the IHS's 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 agency's decision. The appeal should state the reasons why the agency response is insufficient or inadequate. Complainants should attach a copy of their original request and the agency response to it, clearly mark the appeal with the words, "Information Quality Appeal," and send the appeal to the specific agency appeals address:

The agency program official who resolved the original complaint will not have responsibility for the appeal.

## **VII. Influential Scientific, Financial and Statistical Information**

If an agency is responsible for disseminating "influential" information, guidelines for dissemination should include a high degree of transparency about data and methods to facilitate its reproducibility by qualified third parties. Information is considered influential if it will have a substantial impact on important public policies or important private sector decisions. Since much of IHS's actuarial, statistical and analytical information products potentially have an impact on important public policies, IHS's information that is subject to section 515 should be highly transparent and capable of being reproduced by qualified persons.

IHS's guidelines call for identification and documentation of data sets used in producing estimates and projections and clear descriptions of methods used to produce estimates and to develop model projections to make its results as transparent as possible. Many estimates and projections included in IHS information products are not directly reproducible by the public because the underlying data sets used to produce them are confidential. However, some statistical publications that are based on publicly available data and whose programs are made available on request are fully reproducible by the public. And IHS is in the process of developing public-use versions of several data files, which will increase the reproducibility of estimates and projections to the extent possible while still protecting confidentiality. Some estimates and projections may not be easily reproduced by third parties due to the complexity and detail of the methods and data. In these cases greater emphasis is placed on periodic review by outside panels of technical experts.

IHS also achieves transparency through wide dissemination of its information. Most reports and other data products are available both as printed and electronic documents. They are announced on the IHS web site and most electronic versions can be accessed and

downloaded directly from the IHS web site. All documents posted on our Web site since year 2000 are section 508 compliant making information available to an audience that includes persons who have a visual impairment and read online using assistive technology.

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