

Challenging National Center for Health Statistics Birth and Death Rate Data: Guidelines for the Indian Housing Block Grant Formula

This document, in question and answer format, outlines the steps HUD requires for a tribe to challenge the National Center for Health Statistics (NCHS) birth and death rate data used by the Indian Health Service (IHS) and the Needs component of the Indian Housing Block Grant (IHBG) formula to project 2000 Census or tribal survey data to the present.

Q1: How is the Needs component of the IHBG formula affected by birth and death rate data as provided by the NCHS?

A1: In accordance with 24 CFR 1000.330(b), the data for the Needs variables are adjusted annually beginning the year after the Needs data is collected using IHS projections based upon birth and death rate data as provided by the NCHS. If the Needs data are based on 2000 Census, then the adjustment would begin in 2001 and occur in each subsequent year until new base data is collected. If the Needs data is based on data alternative to 2000 Census and approved by HUD, then the adjustment would begin in the year following the year in which the base data was collected and occur in each subsequent year until new base data is collected.

Q2: Can tribes or tribally designated housing entities (TDHE) challenge birth and death data?

A2: Yes. In accordance with §1000.336 (a)(7), a tribe/TDHE may challenge data including birth and death rate data provided by the NCHS to the IHS for population growth projections. Please note that only the data used in making such projections may be challenged. The actual methodology used to compute the projections may not be challenged on an individual tribal level to ensure all tribes are subject to the same method of projection.

Q3: What is the procedure for challenging NCHS birth and death rate data used in IHS projections?

A3: NOTE: HUD is currently researching how the NCHS collects its data, whether the NCHS has a challenge process, how the IHS uses the NCHS in its projection process and whether the IHS has a challenge process. We expect to find an existing publication we can refer to tribes. Therefore, no additional data collection time would be required.

Q4: What do I need to do to update my IHBG formula data once my challenge has been accepted by the NCHS and/or IHS?

A4: In order for a challenge to be considered for the upcoming FY allocation, data and documentation that the data was approved by NCHS and/or IHS must be submitted in writing to the IHBG Formula Customer Service Center by October 1 at the address

below. For example, all data and NCHS and/or IHS approval documentation must be submitted by October 1, 2006, for consideration in the FY 2007 IHBG funding cycle.

All data and approval documentation should be sent to:

IHBG Formula Customer Service Center
1112 16th St. NW, Ste. 240
Washington, D.C. 20036
Toll Free: 800-410-8808
TTY: 800-505-5908
FAX: 202-393-5043
E-mail: IHBGformula@swinter.com