



# BSC, NCHS

Board of Scientific Counselors,  
National Center for Health Statistics

June 11, 2021

The Honorable Xavier Becerra  
Secretary  
Department of Health and Human Services  
200 Independence Avenue, S.W.  
Washington, D.C. 20201

Dear Mr. Secretary:

I am writing on behalf of the Board of Scientific Counselors (BSC) of the National Center for Health Statistics (NCHS), Centers for Disease Control and Prevention (CDC)/Health and Human Services (HHS) regarding the work performed by NCHS. The BSC is an independent board governed by the provisions of the Federal Advisory Committee Act (FACA) and charged with providing advice and recommendations on the scientific and technical aspects of the work carried out by NCHS. As such, the Board seeks both to highlight the importance of the work being done by NCHS as well as the critical funding necessary to achieve that work.

NCHS plays a critical role as an independent federal statistical agency in performing and understanding various data collection, analysis, and reporting that is essential to understanding the health of the U.S. population. During the COVID-19 pandemic, this was particularly important as it was essential to have a national view based on data and statistics regarding the course of the pandemic.

One pillar of NCHS's work is the reporting performed through the mortality data produced by the National Vital Statistics System (NVSS) within NCHS. The Board specifically wants to endorse and affirm the scientific validity of mortality statistics provided by NVSS through strong partnerships with vital record jurisdictions throughout the country. Our expression of support is motivated by the fact that COVID-19 deaths have been incorrectly characterized by some individuals as overstated.<sup>1</sup> At about the same time, HHS attempted to reassign the reporting of hospital data on COVID-19 from CDC to HHS, although this

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<sup>1</sup> ["Fact check: 94% of individuals with additional causes of death still had COVID-19,"](#) Reuters, September 3, 2020.

decision was reversed.<sup>2,3</sup> In the context of the ongoing pandemic, these events had the potential to undermine the public's trust in statistics produced by NCHS.

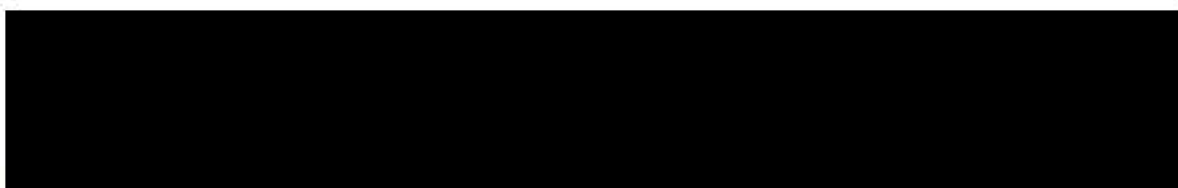
The American people deserve official statistics they can trust. Such statistics are produced by NCHS, which is an independent branch of the civil service staffed by respected scientists and free from political influence. We believe that the mortality statistics produced by NCHS currently meet these criteria as do the other statistics reported by NCHS.

We urge you to take the following three actions in order to preserve the scientific integrity of the data produced by NCHS, and in particular the mortality data produced by the NVSS:

- 1) First, affirm that the responsibility for producing mortality statistics will continue to lie with the NVSS scientific staff, whose work should continue to be insulated from the risk of political interference.
- 2) Second, ensure that HHS and CDC will continue to provide adequate budgetary resources to NCHS/NVSS.
- 3) Third, in your public statements, convey unambiguously to the American people that the mortality statistics currently produced by the NVSS via the ongoing collaboration of the 57 vital registration jurisdictions with National Association for Public Health Statistics and Information Systems (NAPHSIS) and NCHS are scientifically valid and serve as the gold standard to understand the causes of mortality in the United States.

On behalf of the Board of Scientific Counselors of the National Center for Health Statistics.

Sincerely,



Linette T. Scott, MD, MPH  
Chair, Board of Scientific Counselors

cc: Rochelle Walensky, MD, MPH  
Director, Centers for Disease Control and Prevention

Brian C. Moyer, PhD  
Director, National Center for Health Statistics

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<sup>2</sup> ["CDC Director Dr. Robert R. Redfield and HHS Chief Information Officer Jose Arrieta: Remarks on HHS Protect,"](#) July 15, 2020.

<sup>3</sup> ["Covid-19 Data Will Once Again Be Collected by CDC, in Policy Reversal,"](#) Wall Street Journal, September 21, 2020.