

July 8, 2025

CDC Desk Officer  
Office of Management and Budget  
725 17th Street NW  
Washington, DC 20503

To Whom it May Concern,

I am writing on behalf of IPUMS, which houses the world's largest and most intensively used database covering the human population, in response to the Center for Disease Control's request to obtain public comments on the request titled "Research Data Center Proposal for Access to Confidential Data for NCHS" (Docket Number 30Day-25-1363). **We are writing to express our support for maintaining a vital mechanism that allows researchers to request and, once approved, access restricted use versions of data produced by the National Center for Health Statistics (NCHS)**, including the National Health Interview Survey (NHIS) and NCHS survey data linked to information from the National Death Index (NDI).

The IPUMS Center for Data Integration is housed at the University of Minnesota. IPUMS data are used extensively by the research community, but also by policymakers, non-governmental organizations, journalists, students and educators, and even individual community members. IPUMS disseminates harmonized versions of the public-use NHIS data files via [nhis.ipums.org](http://nhis.ipums.org). 23,000 IPUMS NHIS users from a broad range of backgrounds use these data to inform myriad topics, including but not limited to health disparities, health care policy, mortality, maternal health and child health and wellbeing. The public-use data are an invaluable part of the federal statistical research infrastructure; NHIS data have been requested over 200,000 times from IPUMS NHIS alone. At the same time, some applications require access to detail not releasable in the public-use versions of the files, such as state of residence, country of birth, or exact dates of events. Inquiries about how to access these restricted measures are among the most frequent requests that the IPUMS NHIS User Support team receives. Providing access to restricted-use versions of the data to approved researchers via the NCHS research data center (RDC) and the federal statistical research data center (FSRDC) network is a cost-effective and invaluable resource that allows for the protection of individuals' data while ensuring important measures can be used when necessary and appropriate, without requiring additional data collection efforts.

IPUMS seeks to increase the accessibility and expand usage of highly valuable population data. With over three decades of experience, our organization and staff have cultivated

expertise in population data sources. We are highly attuned to what data users want and need, as well as how these data serve the populations that they represent. It is with this wealth of experience working directly with these data as well as data users from a variety of backgrounds that we support the efforts of the NCHS RDC to maintain a process that allows for access to restricted use versions of these valuable data to approved data users.

Best Regards,

A handwritten signature in black ink, appearing to read "Steven Ruggles". The signature is fluid and cursive, with the first name "Steven" and last name "Ruggles" clearly distinguishable.

Steven Ruggles  
Director of IPUMS Center for Data Integration  
University of Minnesota