



# Resource of Health Equity-related Data Definitions, Standards, & Stratification Practices



February 2024

## Resource of health equity-related data definitions, standards, and stratification practices

Advancing health equity and improving health equity-related data collection are priorities for the Biden-Harris Administration, as detailed in Executive Order 13985 ([Advancing Racial Equity and Support for Underserved Communities Through the Federal Government](#)), released in January 2021, and subsequent equity-focused Executive Orders, including Executive Order 14031 ([Advancing Equity, Justice, and Opportunity for Asian Americans, Native Hawaiians, and Pacific Islanders](#)), released in May 2021, Executive Order 14075 ([Advancing Equality for Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex Individuals](#)), released in June 2022, and Executive Order 14091 ([Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government](#)), released in February 2023. In alignment with these Executive Orders, *Advance Equity* is the first of the Centers for Medicare & Medicaid Services (CMS)'s six [Strategic Pillars](#), highlighting the importance of addressing the health disparities that underlie the United States' health care system. Health equity-related data collection is critical for advancing equity as the lack of data impedes measurement of disparities and the identification of opportunities to drive action. Standardized data collection and stratification allow for comprehensive analyses that can be combined or compared across multiple programs or initiatives; and in turn, offer an important first step towards improving population health.

In 2022, CMS released its [Framework for Health Equity 2022-2032](#), which contains five health equity priorities for reducing disparities in health. Priority 1, “*Expand the Collection, Reporting, and Analysis of Standardized Data*” reflects the importance of ensuring that CMS's collection of health equity-related data, including but not limited to sociodemographic and social determinants of health (SDOH) information, is comprehensive, consistent, and interoperable. Efforts toward achieving this priority – i.e., addressing current gaps in relevant data collection, reporting, and analysis – will not only enhance overall CMS data integrity by better capturing the experiences of people marginalized by the healthcare system, but will drive meaningful transformation in policies and programs for the individuals that CMS serves.

This document serves as a technical resource that can be used by organizations and entities, such as providers, states, community organizations, and others, that wish to harmonize with CMS when collecting, stratifying, and/or analyzing health equity-related data. It may also clarify differences in results that may arise when different data standards and definitions are used. This document includes suggested definitions, standards, and stratification practices for the following sociodemographic elements:

- Race
- Ethnicity
- Sex (assigned at birth)
- Disability status
- Gender identity
- Sexual orientation
- Primary Language
- English language proficiency
- Rurality/urbanicity or residence

Both “basic” and “preferred” standards are provided in the tables that follow for each of the above sociodemographic elements. “Basic” in this context is intended to refer to the lowest level of data granularity, while “preferred” refers to a level of granularity or complexity that goes beyond the basic standard.

**NOTE:**

CMS has prepared the following table as a technical resource for organizations and entities, such as providers, states, community organizations, and others. We hope these standards can be useful as different organizations and entities work to improve their data collection. Where applicable to a given organization or entity and appropriate, CMS recommends harmonization with the United States Core Data for Interoperability (USCDI) standards. We may update this resource in the future to reflect advancements in sociodemographic data collection. We note that this resource does not create or override any data collection or stratification requirements.

Data Element	Basic Standard				Preferred Standard				Notes
	Basic Standard†	Definition per Basic Standard	Question specified for the Basic Standard	Categories per Basic Standard	Preferred Standard ‡	Definition per Preferred Standard	Question specified for the Preferred Standard	Categories per Preferred Standard	
Race	<a href="#">1997 OMB Data Standard</a>	N/A	N/A	(One of more categories may be selected) <ul style="list-style-type: none"> <li>American Indian or Alaska Native</li> <li>Asian</li> <li>Black or African American</li> <li>Native Hawaiian or Other Pacific Islander</li> <li>White</li> </ul>	<a href="#">2011 HHS Data Standards</a>	N/A	What is your race? (One or more categories may be selected)	<ul style="list-style-type: none"> <li>White</li> <li>Black or African American</li> <li>American Indian or Alaska Native</li> <li>Asian Indian*</li> <li>Chinese*</li> <li>Filipino*</li> <li>Japanese*</li> <li>Korean*</li> <li>Vietnamese*</li> <li>Other Asian**</li> <li>Native Hawaiian#</li> <li>Guamanian or Chamorro###</li> <li>Samoan#</li> <li>Other Pacific Islander#</li> </ul> (*Rolls-up to the Asian category; #Rolls-up to the Native Hawaiian or Other Pacific Islander category) (*When aligning with <a href="#">Certified Health IT</a> report Other Asian as Asian) (** When aligning with <a href="#">Certified Health IT</a> , Guamanian and Chamorro are split)	<ul style="list-style-type: none"> <li>Note these standards conceptualize Race separately from Ethnicity.</li> <li>Recommend sufficient sample size to produce reliable estimates, as noted in the 2011 HHS Data Standard Guidance.</li> <li>Recommend using the 2011 HHS Data Standard only if the sample size is sufficiently large for that level of granularity.</li> <li>When using race data from Medicare enrollment (SSA) or the RTI race code, it is recommended not to stratify by "Other" or "Unknown".</li> <li>Recommend using high quality, self-reported data when available.</li> <li>When data quality / missingness are a concern, recommend using imputed race (Medicare Bayesian Improved Surname Geocoding (MBISG) for Medicare, which are more updated than the RTI Race Code; Bayesian Improved First Name Surname Geocoding (BIFSG) for Medicaid and CHIP).</li> <li>Consider including the following response options for new data collection or when there is an opportunity to update existing data collection: "Unknown", "Other", or "Choose to not respond".</li> <li>Consider focus group testing or formal "cognitive testing" if translating to a different language to ensure the adequacy of translations.</li> </ul>

Data Element	Basic Standard				Preferred Standard				Notes
	Basic Standard†	Definition per Basic Standard	Question specified for the Basic Standard	Categories per Basic Standard	Preferred Standard ‡	Definition per Preferred Standard	Question specified for the Preferred Standard	Categories per Preferred Standard	
Ethnicity	<a href="#">1997 OMB Data Standard</a>	N/A	N/A	<ul style="list-style-type: none"> <li>Hispanic or Latino</li> </ul>	<a href="#">2011 HHS Data Standards</a>	N/A	Are you Hispanic, Latino/a, or Spanish Origin? (One or more categories may be selected)	<ul style="list-style-type: none"> <li>Not of Hispanic, Latino/a, or Spanish origin</li> <li>Mexican, Mexican American, Chicano/a**</li> <li>Puerto Rican*</li> <li>Cuban*</li> <li>Another Hispanic, Latino/a or Spanish origin***</li> </ul> <p>(*Rolls-up to the Hispanic, Latino/a category)</p> <p>(* Mexican, Mexican American, and Chicano are three separate concepts in the standards used by <a href="#">Certified Health IT</a>)</p> <p>(**When aligning with <a href="#">Certified Health IT report Another Hispanic, Latino/a or Spanish origin as Hispanic or Latino</a>)</p>	<ul style="list-style-type: none"> <li>Note these standards conceptualize Ethnicity separately from Race.</li> <li>Subgroups should be of sufficient sample size to produce reliable estimates, as noted in the 2011 HHS Data Standard Guidance.</li> <li>Use of the 2011 HHS Data Standard is recommended only if the sample size is sufficiently large for that level of granularity.</li> <li>When using ethnicity data from Medicare enrollment (SSA) or the RTI race code, do not recommend stratifying by "Other" or "Unknown."</li> <li>Recommend stratifying by ethnicity separately from race stratification.</li> <li>Recommend using high quality, self-reported data when available.</li> <li>When data quality/missingness are a concern, recommend using imputed ethnicity (MBISG for Medicare, which are more updated than the RTI Race Code; Bayesian Improved First Name Surname Geocoding (BIFSG) for Medicaid and CHIP).</li> <li>Consider including the following response options for new data collection or when there is an opportunity to update existing data collection: "Unknown", "Other", or "Choose to not respond."</li> <li>Consider focus group testing or formal "cognitive testing" if translating to a different language to ensure the adequacy of translations.</li> </ul>

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	Basic Standard†	Definition per Basic Standard	Question specified for the Basic Standard	Categories per Basic Standard	Preferred Standard ‡	Definition per Preferred Standard	Question specified for the Preferred Standard	Categories per Preferred Standard	
Sex (as Assigned at Birth)	<a href="#">2011 HHS Data Standards</a>	N/A	<ul style="list-style-type: none"> <li>What is your sex?</li> </ul>	<ul style="list-style-type: none"> <li>Male</li> <li>Female</li> </ul>	<a href="#">USCDI version 4 (that references SNOMED)</a>	Documentation of a specific instance of sex information	N/A	<ul style="list-style-type: none"> <li>Female</li> <li>Male</li> <li>Unknown</li> </ul>	<ul style="list-style-type: none"> <li>Sex assigned at birth and Gender Identity should not be conflated.</li> <li>Where data are available, stratify by sex assigned at birth as well as gender identity.</li> <li>If the distribution is unexpected, you may wish to acknowledge there may be issues around generalizability.</li> <li><a href="#">Consider including "Intersex" for new data collection as feasible, consistent with EO 14075.</a></li> <li><a href="#">Consider using "Sex Parameter for Clinical Use (SPCU)", a newly proposed sex characteristic defined within the HL7 gender harmony model.</a></li> <li>Consider focus group testing or formal "cognitive testing" if translating to a different language to ensure the adequacy of translations.</li> </ul>

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		Basic Standard†	Definition per Basic Standard	Question specified for the Basic Standard	Categories per Basic Standard	Preferred Standard ‡	Definition per Preferred Standard	Question specified for the Preferred Standard	Categories per Preferred Standard	
Sexual Orientation and Gender Identity (SOGI)	Gender Identity	<a href="#">NASEM</a>	Gender identity is a core element of a person's individual identity	What is your current gender? (Mark only one)	<ul style="list-style-type: none"> <li>Female</li> <li>Male</li> <li>Transgender</li> <li>[If respondent is American Indian Alaska Native:] Two-Spirit</li> <li>I use a different term: [free text]</li> <li>(Don't know)</li> <li>(Prefer not to answer)</li> </ul>	<a href="#">NASEM (modified for closer alignment with SNOMED)</a>	Gender identity is a core element of a person's individual identity	What is your current gender? (Mark only one)	<ul style="list-style-type: none"> <li>Female</li> <li>Male</li> <li>Transgender Female</li> <li>Transgender Male</li> <li>[If respondent is AIAN:] Two-Spirit</li> <li>I use a different term: [free text]</li> <li>(Don't know)</li> <li>(Prefer not to answer)</li> </ul>	<ul style="list-style-type: none"> <li>Gender identity and sex assigned at birth should not be conflated.</li> <li>Gender identity should be self-reported.</li> <li>Consideration should be given if the question is asked in languages other than English.</li> <li>Using sex assigned at birth as well as these gender identity codes allows for mapping to USCDI v4.</li> <li>Where applicable, consider including non-binary as a category.</li> <li><a href="#">AI/AN response option should be reserved for those data vehicles that can enable skip logic and ensure that the response option appears only for those who have already self-identified as AI/AN.</a></li> <li>Consider focus group testing or formal "cognitive testing" if translating to a different language to ensure the adequacy of translations.</li> </ul>
	Sexual Orientation	<a href="#">NASEM</a>	Sexual orientation is a multidimensional construct encompassing emotional, romantic, and sexual attraction, identity, and behavior	Which of the following best represents how you think of yourself? (Select one)	<ul style="list-style-type: none"> <li>Lesbian or gay</li> <li>Straight, that is, not gay or lesbian</li> <li>Bisexual</li> <li>[If respondent is AIAN:] Two-Spirit</li> <li>I use a different term [free-text]</li> <li>(Don't know)</li> <li>(Prefer not to answer)</li> </ul>	Same as Basic Standard	Same as Basic Standard	Same as Basic Standard	Same as Basic Standard	<ul style="list-style-type: none"> <li>Sexual orientation should be self-reported.</li> <li>Consideration should be given if the question is asked in languages other than English.</li> <li><a href="#">AI/AN response option should be reserved for those data vehicles that can enable skip logic and ensure that the response option appears only for those who have already self-identified as AI/AN.</a></li> <li>Consider focus group testing or formal "cognitive testing" if translating to a different language to ensure the adequacy of translations.</li> </ul>

Data Element	Basic Standard				Preferred Standard				Notes
	Basic Standard†	Definition per Basic Standard	Question specified for the Basic Standard	Categories per Basic Standard	Preferred Standard ‡	Definition per Preferred Standard	Question specified for the Preferred Standard	Categories per Preferred Standard	
Disability	<a href="#">2011 HHS Data Standards</a>	N/A	<ul style="list-style-type: none"> <li>• Are you deaf or do you have serious difficulty hearing?</li> <li>• Are you blind or do you have serious difficulty seeing, even when wearing glasses?</li> <li>• Because of a physical, mental, or emotional condition, do you have serious difficulty concentrating, remembering, or making decisions? (5 years old or older)</li> <li>• Do you have serious difficulty walking or climbing stairs? (5 years old or older)</li> <li>• Do you have difficulty dressing or bathing? (5 years old or older)</li> <li>• Because of a physical, mental, or emotional condition, do you have difficulty doing errands alone such as visiting a doctor's office or shopping? (15 years old or older)</li> </ul>	Responses per question: <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>	Same as Basic Standard	Same as Basic Standard	Same as Basic Standard	Same as Basic Standard	<ul style="list-style-type: none"> <li>• Ideally, as is the case with many other health equity-related sociodemographic data elements, disability status is self-reported. Implementation of this approach will likely require attention to whether the question is asked in languages other than English.</li> <li>• CMS recognizes that many federal and state programs use eligibility-based definitions of disability and that the 2011 HHS Standards may be challenging. Consider using the 2011 HHS Standard as data collection efforts evolve to the extent permitted by statute, regulation, or guidance.</li> <li>• Consider focus group testing or formal “cognitive testing” if translating to a different language to ensure the adequacy of translations.</li> </ul>



Data Element	Basic Standard				Preferred Standard				Notes	
	Basic Standard†	Definition per Basic Standard	Question specified for the Basic Standard	Categories per Basic Standard	Preferred Standard ‡	Definition per Preferred Standard	Question specified for the Preferred Standard	Categories per Preferred Standard		
Language	English Language Proficiency	2011 HHS Data Standards	N/A	How well do you speak English? (5 years old or older)	• Very well • Well • Not well • Not at all	Same as Basic Standard	Same as Basic Standard	Same as Basic Standard	Same as Basic Standard	<ul style="list-style-type: none"> <li>Ideally, as is the case with many other health equity-related sociodemographic data elements, English Language Proficiency is self-reported. Implementation of this approach will likely require attention to whether the question is asked in languages other than English.</li> <li>Consider focus group testing or formal “cognitive testing” if translating to a different language to ensure the adequacy of translations.</li> </ul>
	Primary Language	<a href="#">2011 HHS Data Standards</a>	N/A	Do you speak a language other than English at home?	<ul style="list-style-type: none"> <li>Yes</li> <li>No</li> </ul> (If Yes) What is this language? <ul style="list-style-type: none"> <li>Spanish</li> <li>Another language</li> </ul>	Same as Basic Standard	Same as Basic Standard	Same as Basic Standard	Same as Basic Standard	<ul style="list-style-type: none"> <li>Ideally, as is the case with many other health equity-related sociodemographic data elements, Primary Language is self-reported. Implementation of this approach will likely require attention to whether the question is asked in languages other than English.</li> <li>You may wish to expand the list of response options as appropriate, but depending on subgroup sizes (i.e., if they are especially small), you can collapse or “roll-up” categories to meet the 2011 HHS Data Standards.</li> <li>Consider focus group testing or formal “cognitive testing” if translating to a different language to ensure the adequacy of translations.</li> </ul>

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	Basic Standard†	Definition per Basic Standard	Question specified for the Basic Standard	Categories per Basic Standard	Preferred Standard ‡	Definition per Preferred Standard	Question specified for the Preferred Standard	Categories per Preferred Standard	
Geography (Rurality)	<a href="#">CBSA</a>	Metropolitan and Micropolitan Statistical Areas are collectively referred to as Core-Based Statistical Areas. Metropolitan and micropolitan statistical areas are defined in terms of whole counties or county equivalents, including the six New England states.	N/A	<ul style="list-style-type: none"> <li>Metropolitan Statistical Areas: Have at least one urbanized area of 50,000 or more population, plus adjacent territory that has a high degree of social and economic integration with the core as measured by commuting ties. (e.g., New York-Newark-Jersey City, Washington-Arlington-Alexandria) = <b>Urban</b></li> <li>Micropolitan Statistical Areas: Have at least one urban cluster of at least 10,000 but less than 50,000 population, plus adjacent territory that has a high degree of social and economic integration with the core as measured by commuting ties. (e.g., Tupelo, MS; Augusta-Waterville, ME) = <b>Rural</b></li> <li>Non-CBSA: Do not have at least one urban cluster of at least 10,000 (e.g., Millington, MD) = <b>Rural</b></li> <li>NOTE: Metropolitan and micropolitan statistical areas are defined in terms of whole counties or county equivalents, including the six New England states. As of June 6, 2003, there are 362 metropolitan statistical areas and 560 micropolitan statistical areas in the United States.</li> </ul>	<a href="#">RUCA Codes</a>	The rural-urban commuting area (RUCA) codes classify U.S. census tracts using measures of population density, urbanization, and daily commuting.	N/A	<ul style="list-style-type: none"> <li>1 = Metropolitan area core: primary flow with an urbanized area (UA) = <b>Urban</b> (e.g., Baltimore County, MD; Dallas County, TX)</li> <li>2 = Metropolitan area high commuting: primary flow 30% or more to a UA = <b>Urban</b> (e.g., Montgomery County, MD; Galveston County, TX)</li> <li>3 = Metropolitan area low commuting: primary flow 10% to 30% to a UA = <b>Urban</b> (e.g., Calvert County, MD; Jefferson County, TX)</li> <li>4 = Micropolitan area core: primary flow within an urban cluster (UC) of 10,000 to 49,999 (large UC) = <b>Rural</b> (e.g., Dorchester County, MD; Anderson County, TX)</li> <li>5 = Micropolitan high commuting: primary flow 30% or more to a large UC = <b>Rural</b> (e.g., Talbot County, MD; Calhoun County, TX)</li> <li>6 = Micropolitan low commuting: primary flow 10% to 30% to a large UC = <b>Rural</b> (Worcester County, MD; Cooke County, TX)</li> <li>7 = Small town core: primary flow within an urban cluster of 2,500 to 9,999 (small UC) = <b>Rural</b> (e.g., Garrett County, MD; Falls County, TX)</li> <li>8 = Small town high commuting: primary flow 30% or more to a small UC = <b>Rural</b> (e.g., Kent County, MD; Hunt County, TX)</li> <li>9 = Small town low commuting: primary flow 10% to 30% to a small UC = <b>Rural</b> (e.g., Queen Anne's County, MD; Limestone County, TX)</li> <li>10 = Rural areas: primary flow to a tract outside of a UA or UC = <b>Rural</b> (e.g., St Mary's County, MD; Shelby County, TX)</li> </ul>	<ul style="list-style-type: none"> <li>At a minimum, response options or groupings should include "rural" and "urban," but could be more granular when and where appropriate and possible (e.g., "metropolitan," "micropolitan," "rural," and "non-core-based statistical area (CBSA)").</li> <li>You may consider collapsing or "rolling up" categories to meet your sample size needs for reporting, but the data used, ideally, should have been collected in as granular a manner as possible (and reported in as granular a manner as possible, while still ensuring validity).</li> <li>When applicable, consider more granular rural categories such as Frontier.</li> <li><a href="#">The Rural-Urban Continuum Codes (RUCC) are another standard used to define rural and urban.</a></li> </ul>

†"Basic Standard" in this context is intended to refer to a lower level of data granularity.

‡"Preferred standard" is recommended for use where possible, including when updating data collection methods/standards. "Preferred" in this context generally refers to a level of data granularity or complexity that goes beyond the "basic" standard.

## Resource of health equity-related data definitions, standards, and stratification practices

### Frequently Asked Questions

#### 1. What is this resource document and why is CMS releasing it?

This document is a technical resource of definitions, standards, and stratification practices for health equity-related data elements that can be used by organizations/entities such as providers, states, community organizations, and others that wish to harmonize with CMS when collecting, stratifying, and/or analyzing health equity-related data. It may also clarify differences in results that may arise when different data standards and definitions are used.

CMS's Framework for Health Equity 2022-2032 contains five priorities for reducing health disparities. Priority 1, "Expand the Collection, Reporting, and Analysis of Standardized Data" reflects the importance of ensuring that CMS's health equity-related data and social determinants of health (SDOH) data are comprehensive, consistent, and interoperable. Standardized data collection and stratification allow for comprehensive analyses that can be combined or compared across multiple programs or initiatives; and in turn, offer an important first step towards improving population health.

#### 2. What data elements are included in the resource document?

This document includes suggested definitions, standards, and stratification practices to address populations and areas identified in Executive Order 13985 "Advancing Racial Equity and Support for Underserved Communities Through the Federal Government" and Executive Order 14091 "Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government." The included data elements are race, ethnicity, sex, disability status, gender identity, sexual orientation, primary language, English language proficiency, and rurality/urbanicity of residence.

#### 3. How were these standards selected?

We selected the standards based upon broadest applicability and feasibility for the various data collection methods and systems, as well as usage of the data to help harmonize assessment of the included data elements across CMS.

#### 4. Will all CMS data collection efforts align with the information in the resource document?

Under certain situations, some of the standards listed in this resource document are binding on CMS as a federal agency (e.g., OMB standards for race and ethnicity, HHS standards for the collection of demographic data in population health surveys). Other standards listed in this

document are not binding but CMS programs will begin moving towards the voluntary adoption of these standards where practicable and legally permissible to facilitate consistency on the “front end” collection of demographic data and its analysis.

Regardless of the standard adopted for the “front end” collection of demographic data, CMS recommends where applicable and appropriate harmonization with the Office of the National Coordinator for Health Information United States Core Data for Interoperability (USCDI) standards on the “back end” to facilitate the sharing of interoperable data.

#### **5. Will this resource be updated as standards are revised?**

Standards continuously evolve and may be subject to change. We will update this resource as applicable.

#### **6. Are the listed data standards now required of CMS partners for alignment?**

This document is solely a technical resource of suggested data definitions, standards, and stratification practices. Unless and until otherwise noted in statute, regulation, guidance, or formal agreement (including, but not limited to, CMS terms and conditions included in contracts and other binding agreements), these standards are non-binding for CMS partners.

#### **7. What does this mean for state Medicaid and CHIP agencies?**

As noted earlier, this document is a technical resource. Any actual data collection requirements for Medicaid and CHIP agencies would be described in statute or regulation as interpreted in guidance, or state-specific documents like the State’s Medicaid State plan, section 1915 waivers, or section 1115 demonstration terms and conditions.

There are many different ways state Medicaid and CHIP agencies could collect this information, such as standalone surveys and surveys fielded as addenda to state Medicaid and CHIP applications.

As required in regulations at 42 CFR 435.907(b) and 457.330, the single, streamlined application that individuals use to apply for Medicaid or CHIP benefits must be either the model application, or an alternative developed by the state and approved by CMS through a state plan amendment (SPA). In addition to the single, streamlined application, many states have applications or supplemental forms for determining eligibility on a basis other than MAGI, or other alternative applications not subject to CMS approval.

States that wish to update their Medicaid or CHIP alternative, single streamlined application to include these standards may need to work with CMS to determine whether CMS approval and a SPA is needed. States may need to submit a SPA if they want to add questions that are not needed for an eligibility determination or are not for a purpose directly connected to the administration of the state plan, or if they want to make substantive changes that significantly deviate from the model application.

More detailed information on the development, review, and approval of alternative applications is available in the June 18, 2013, joint Center for Consumer Information and Insurance Oversight (CCIIO) and Center for Medicaid and CHIP Services (CMCS) guidance entitled “Guidance on State Alternative Applications for Health Coverage”<sup>1</sup> and in the November 9, 2023 CMCS informational bulletin entitled “Guidance on Adding Sexual Orientation and Gender Identity Questions to State Medicaid and CHIP Applications for Health Coverage.”<sup>2</sup>

#### **8. Are there any additional considerations when it comes to data collection and stratification for American Indian/Alaska Native (AI/AN) populations?**

States are encouraged to use Tribal consultation in developing Tribal data collection, analysis, and data distribution approaches, and may be required to conduct Tribal consultation in certain circumstances (such as prior to submitting a Medicaid SPA that is likely to have a direct effect on Indians and Indian health programs). CMS and Tribes share the goals of eliminating health disparities for AI/ANs and ensuring access to critical health services, including those made available through Medicare, Medicaid, CHIP, and the Health Insurance Marketplace,<sup>3</sup> is maximized, to advance or enhance Tribal members’ physical, mental, and economic status. To achieve these goals, and to the extent practicable and permitted by law, it is important that CMS, States, and Indian Tribes engage in open, continuous, and meaningful consultation.

More information on the CMS consultation policy can be found here:

<https://www.cms.gov/Outreach-and-Education/American-Indian-Alaska-Native/AIAN/Downloads/CMSTribalConsultationPolicy2015.pdf>

#### **9. What is the recommended solution when it is not feasible to align with the standards in this resource?**

This document is a technical resource of suggested definitions, standards, and stratification practices. Alignment with these standards may not be feasible under certain circumstances, necessitating deviations. Regardless of which data standards are adopted for “front end” collection of demographic data, CMS recommends harmonization with the ONC USCDI standards to facilitate “back-end” data interoperability.

#### **10. How can one receive assistance in implementing these standards?**

Each of the listed standards provide documentation and guidance for implementation that can be reviewed in detail. Where assistance is needed with regard to CMS usage of these standards and stratification practices, the Health Equity Technical Assistance program can be contacted at [HealthEquityTA@cms.hhs.gov](mailto:HealthEquityTA@cms.hhs.gov).

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<sup>1</sup> <https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/state-alt-app-guidance-6-18-2013.pdf>

<sup>2</sup> <https://www.medicaid.gov/sites/default/files/2023-11/cib11092023.pdf>

<sup>3</sup> Health Insurance Marketplace<sup>®</sup> is a registered service mark of the U.S. Department of Health & Human Services.