

Supporting Statement A for Request for
Reinstatement with Change
National Vital Statistics Report Forms

OMB No. 0920-0213

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**Supporting Statement A for Request for Clearance:
NATIONAL VITAL STATISTICS REPORT FORM**

A. Justification

This is a request for reinstatement with changes of approval for data collection forms used by State and/or county vital registration offices to report to the Federal government (a) provisional counts of births, deaths, infant deaths, marriages, and divorces at the end of each month and (b) annual final counts of marriages and divorces/annulments in support of the National Vital Statistics System. There are no direct costs to respondents; the data are routinely available in each reporting office as a by-product of ongoing activities. Final counts of marriages and divorces are requested from all States for all months of a given year.

These forms are in ongoing use. There are only two changes to the request: 1) the burden has been increased by 3 hours. Previously there were two questionnaires for two different respondents collecting the same data. They were combined into one questionnaire, resulting in a slight increase in the total burden; and 2) four letters were received during public comment of the 60-day notice, CDC's response are attached.

1. Circumstances Making the Collection of Information Necessary

Background

The compilation of national vital statistics by the Federal government dates back to the beginning of the 20th century. In July 1946, the President's Reorganization Plan No. 2 transferred this function from the U.S. Bureau of the Census to the Federal Security Administrator. It was subsequently transferred to the Secretary of the Department of Health, Education, and Welfare, part of which was later reorganized as the Department of Health and Human Services. To administer these functions, the National Office of Vital Statistics was established in the Public Health Service in April 1953. In August of 1960, the National Office of Vital Statistics was reorganized as the Division of Vital Statistics in the newly-created National Center for Health Statistics, which is now part of the Centers for Disease Control and Prevention.

One of the functions of the National Center for Health Statistics (NCHS) is to plan and administer a program to provide statistics on births, deaths, fetal deaths, marriages, and divorces reported in the National Vital Statistics System. This includes promoting the uniform collection of data on these events and providing technical assistance to the registration areas; conducting followback surveys to expand the scope of national vital statistics beyond the data available from vital records; preparing life tables and analyses of life table phenomena; and investigating the quality and reliability of data and methodology.

One part of this function is to provide national estimates of monthly occurrences (i.e., provisional counts) of births, deaths, infant deaths, marriages, and divorces following the end of each month. The collection of the data is authorized by 42 USC 242k, a copy of which is provided in Attachment A. The *National Vital Statistics Report* (NVSR) disseminates these provisional counts of births, deaths, infant deaths, marriages, and divorces, which are obtained from each State and some counties at the end of each month using the form provided in Attachment B. Similar data have been published since 1937 and are the sole source of these data at the national level. A sample publication is provided in Attachment C. The data are used by the Department of Health and Human Services and by other government, academic, and private research organizations in tracking changes in trends of vital events. The counts of events requested on the form are necessary to the administration of this portion of the program.

Another part of this function is to provide final annual counts of marriages and divorces for the United States and each State. This form (Attachment D) is the sole source of final counts for these two events. The counts on these forms are published in the NVSR and are necessary to the administration of this portion of the program. They differ from the provisional estimates described above in that they represent complete counts of marriages and divorces occurring during the respective months of the year. These final counts are usually available from State officials about eight months after the end of the data year. Similar data are available for most years dating back to 1886. The collection of these data is also authorized by 42 USC 242k (Attachment A.)

Privacy Impact Assessment

A Privacy Impact Assessment for the National Vital Statistics System was submitted on May 18, 2007.

Overview of the Data Collection System

Data represent a complete census (100% samples) rather than a fractional sample. The respondents are the registration officials in the 50 States, the District of Columbia, New York City, Puerto Rico, Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands. In addition, counts of marriages will be collected from individual counties in New Mexico, due to a lack of centralized complete collection in this registration area. Data collection is accomplished by the respondent replying to an email message with the completed form (see attachments B and D).

Items of Information to be Collected

Monthly counts of birth certificates, death certificates, marriages, divorces and

annulments are collected. Annual counts of marriages, divorces and annulments are also collected. There is no Information in Identifiable Form (IIF).

Identification of Website(s) and Website Content Directed at Children Under 13 Years of Age

There are no websites directed at children under 13 years of age.

2. Purpose and Use of the Information Collection

The data are widely used by all agencies of the Public Health Service and other government, academic, and private research organizations in tracking changes in trends of vital events, including trends in family formation and dissolution. The data are essential to the U. S. Bureau of the Census as input to their various population estimates. They are also used each month by the Bureau of Economic Analysis, Department of Commerce, to extrapolate an element of the Gross National Product -- the personal consumption of funeral expenses. These data complement the U.S. Vital Statistics program and are serve as the basis of summary birth, death and marriage data in the U.S. They also provide surveillance for change in trends in the various vital events being tracked; if the data were not collected monthly, changes in trends would not be recognized at an early stage. Final marriage and divorce data must be collected annually to permit uninterrupted tracking of family dynamics.

Privacy Impact Assessment Information

These monthly and annual data are being collected to complement the US Vital Statistics data and to provide summary statistics prior to the availability of full detailed vital statistics information. No IIF is being collected.

3. Use of Improved Information Technology and Burden Reduction

Respondents are encouraged to submit the data in an existing format if that would reduce the burden. Respondents are also encouraged to submit the data by electronic mail whenever possible. For provisional data, all States are now reporting in this manner on a regular basis. NCHS strongly encourages counties to submit data by electronic mail when they have that capability. All States are expected to transmit final marriage and divorce counts by e-mail. An NCHS e-mail address is provided in the instructions for both reporting forms. These policies hold respondent burden to a minimum.

4. Efforts to Identify Duplication and Use of Similar Information

Consultation with State vital statistics offices indicates that there is no other organization, neither private nor public, that is assembling provisional national counts of births, deaths, infant deaths, marriages, and divorces each month or final national counts of marriages performed and divorces granted by month of occurrence. Review of data disseminated by the Bureau of the Census and other agencies indicates that no similar data source exists. This is the sole source of these data at the national level.

5. Impact on Small Businesses or Other Small Entities

No small businesses will be involved in this data collection.

6. Consequences of Collecting the Information Less Frequently

The provisional data must be collected each month for use in the production of population estimates by the U. S. Bureau of the Census and in the extrapolation of data for an element of the Gross National Product by the Bureau of Economic Analysis, Department of Commerce. They also provide surveillance for change in trends in the various vital events being tracked; if the data were not collected monthly, changes in trends would not be recognized at an early stage. Final marriage and divorce data must be collected annually to permit uninterrupted tracking of family dynamics. There are no legal obstacles to reduce the burden.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

Provisional data are collected monthly in order to enable agencies of the Public Health Service and other government, academic, and private research organizations to track changes in trends of vital events.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

The 60-day notice was published in the Federal Register, Volume 73, No. 210, October 29, 2008, pp. 64336-7. A copy of this announcement is provided as Attachment E. Four responses were received -- from the National Association for Public Health Statistics and Information Systems (NAPHSIS), the Friends of NCHS, the Annie E. Casey Foundation, and the Racial and Ethnic Health Disparities Coalition (REHDC) (Attachments F through I). The comments received all address the viability of the National Vital Statistics System and not the data collection covered by the 60-day notice; however, because of the importance of the concerns raised, responses were provided (Attachments J through M).

Consultations have been held with State and local vital registration officials.

NCHS officials maintain ongoing consultation with registration officials in the States at annual Vital Statistics Cooperative Program workshops (last meeting was in June 2008) and in special work groups that include selected State registrars. Other consultation is conducted on an ad hoc basis.

One major source of input is listed below. This organization represents the states and is often our conduit for contacting them:

Garland Land, Executive Director
National Association for Public Health Statistics and Information
Systems (NAPHSIS)
962 Wayne Avenue
Suite 701
Silver Spring, MD 20910
Phone: 301-563-6001
Email: hq@naphsis.org

There are no unresolved issues.

9. Explanation of Any Payment or Gift to Respondents

Through the Vital Statistics Cooperative Program contracts, State Vital Statistics Offices are paid for coordinating the collection of the marriage and divorce information from county offices: \$1000 for 12 months of marriage counts and \$1000 for 12 months of divorce counts. When the information comes directly from the counties (NM), no payment is made.

10. Assurance of Confidentiality Provided to Respondents

Privacy Impact Assessment Information

In review of this application, it has been determined that the Privacy Act is not applicable. Identifying information (names, etc) are not requested for this data collection. The data is not retrieved by any identifiable form, therefore the data collection does not meet the definition of a Privacy Act system of records. Only summary counts are collected, not data on individual characteristics. These data are not subject to the Privacy Act.

This data collection is not subject to the requirements of an Institutional Review Board (Attachment N). No. IIF is being collected.

10. Questions of Sensitive Nature

No sensitive items are included. Only counts of vital events are requested.

11. Estimates of Annualized Burden Hours and Costs

Respondents for the National Vital Statistics Report Form are registration officials in each State and Territory, the District of Columbia, and New York City. In addition, 33 local (county) officials in New Mexico who record marriages occurring in each of the 33 counties of New Mexico use this Form for a total of 91 respondents. There are no costs to respondents other than their time. The data are routinely available in each reporting office as a by-product of ongoing activities.

Respondents for the Annual Vital Statistics Occurrence Report are the 58 registration officials in each State and Territory, the District of Columbia, and New York City. There are no direct costs to respondents; the data are routinely available in each reporting office as a by-product of ongoing activities.

Table 1. Annual burden estimates

Type of Respondents	Form Name	Number of Respondents	Number of Responses Per Respondents	Average Burden Per Response (in hours)	Total Burden (in hours)
State, Territory and New Mexico County officials	Monthly Vital Statistics Report	91	12	10/60	182
State, Territory and other officials	Annual Vital Statistics Occurrence Report	58	1	30/60	29
Total					211

At an average wage rate of \$16 per hour and an average length of interview of 10 minutes, the average cost per respondent is \$2.67 to complete the monthly form. At an average wage rate of \$16 per hour and an average length of interview of 30 minutes, the average cost per respondent is \$8 to complete the annual form. This estimated wage rate is based on information from the wages of State vital statistics personnel completing the forms. The total cost is shown in the table below.

Total Burden Hours	Respondent Wage Rate per Hour	Total Respondent Costs
211	\$16.00	\$3,376

12. Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers

None.

13. Annualized Cost to the Federal Government

The annual cost of collecting, analyzing and publishing the data is approximately \$202,000, including \$102,000 for contract costs and \$100,000 for 1 FTE representing the combined time of several staff members.

14. Explanation for Program Changes or Adjustments

The burden has been increased by 3 hours due to a change in how burden is now being reported to OMB. In the past, the request showed the state and territory monthly form on one line and the New Mexico county request on a separate line even though the data requested were identical. When combining these into one line, the data rounded differently causing a 3 hour change in burden.

15. Plans for Tabulation and Publication and Project Time Schedule

Provisional data are obtained from State officials, processed, analyzed for anomalies, and published ideally about 4 months after the end of the data month. The data for each State and summary for the United States are published each month in the *National Vital Statistics Reports*. A copy of the report is attached (Attachment C). Final marriage and divorce data are published about 10 months after the end of the data year. These data for each State and summary for the United States are to be published each calendar year in the *National Vital Statistics Reports* and/or on the Internet.

16. Reason(s) Display of OMB Expiration Date is Inappropriate

No exemption to not display the expiration date for OMB approval is being sought.

17. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.