

**Supporting Statement for State Death Match Collections**  
**20 CFR 404.301; 404.310-311; 404.316; 404.330-341;**  
**404.350-352; and 404.371, 416.912**  
**0960-0700**

**A. Justification**

**1. Authorizing Laws and Regulations**

Entitlement to retirement, disability, wife's, husband's or parent's benefits under the provisions of the Social Security Act terminates when the beneficiary dies. *Section 205 (r)* of the *Social Security Act* requires the Commissioner of Social Security to contract with the States to obtain death certificate information in order to compare it to the Social Security Administration's (SSA) payment files. This match ensures the accuracy of our payment files by detecting unreported or inaccurate deaths of beneficiaries.

*20 CFR 404.301; 404.310-311; 404.316; 404.330-341; 404.350-352; 404.371; and 416.912* explain how death affects a person's entitlement.

**2. Description of Collection**

About 2.5 million people die in the United States each year, approximately 2 million of which are SSA beneficiaries. The death of a beneficiary is an event that terminates the individual's entitlement to benefits. Under *205(r)*, of the *Act*, the States furnish this information to SSA to compare the death information to SSA payment files.

SSA uses the State Death Match Collections to ensure the accuracy of payment files by detecting unreported or inaccurate deaths of beneficiaries. The States furnish death certificate information to SSA via the Manual Registration Process or the Electronic Death Registration Process (EDR). Both Death Match processes are automated electronic transfers between the states and SSA. The respondents are the States' bureaus of vital statistics.

**Manual Registration Process**

The paper driven process is a slow, front end paper-driven process. It starts usually with the funeral director, charged by State law with completing the demographic information on the individual, such as name, date of birth, Social Security Number and sex code. He then hand delivers the certificate to the attending physician to complete the cause of death information. In some jurisdictions, the data is then delivered to a county or local registrar and finally to the State Department of Vital Statistics where it is officially registered. The States then furnish this information to SSA, using today's technology including Vital Information Systems Network (VISN), (electronic Vital Information Systems Network (eVISN), ConnectDirect).

The contract language currently in place regarding SSA's use of the State data stipulates that SSA must independently verify the State death data before taking a termination action. This process involves alerts to the field to attempt a direct contact with the deceased to verify the death. When that fails, the field office sends a call-in letter to the alleged deceased and sets a diary for its return. When there is no response to the letter, benefits to the alleged decedent are suspended and finally terminated. Termination of benefits can take up to six months. The delay contributes to incorrect payments after death.

Funeral directors are usually first participants in the death registration process and are charged by State law to complete the demographic information on the decedent. The funeral directors usually get demographic information about the decedent from the family. Once the funeral directors complete the death registration information, the funeral directors send the information to the State's bureau of vital statistics, who becomes the official keeper of the death record.

### **EDR Registration Process**

Previously a majority of the registration processes was manual, but we have transitioned to EDR, which continues to grow. The EDR system is web-based. The system permits electronic transfer of the death certificate from the first participant, usually the funeral director, to the next participant who completes a portion of the certificate. EDR reduces the processing time needed to register deaths and drastically improves the business practices of the various participants in death registration. EDR will result in the State's ability to send SSA the report of death within 5 days of the date of death and within 24 hours of receipt in the State repository.

The States have agreed that the on-line verification of the social security number (SSN) at the first point of collection in the registration process, usually by the funeral director, will satisfy the requirement to independently verify the SSN. This will permit SSA to immediately terminate benefits and save \$36-42 million in program dollars and over 102 work years annually. States require SSA to share death data with the four Federal benefit-paying agencies. They are the Office of Personnel Management, Department of Defense, Railroad Retirement Board, and the Department of Veterans Affairs. We expect similar savings for these agencies.

Requests for on-line verification of the SSN will pass through the State server. Each State is responsible for authenticating each death registration participant and maintaining an audit trail of each request. SSA is responsible for authenticating State servers, processing verification requests, and building verification responses. The on-line verification system uses the decedent's demographic information; i.e. SSN, name, date of birth, sex to match with SSA's records. The response will either indicate that the name, date of birth, SSN, and sex match, indicating that it is an accurate report or it will give a code indicating why a match did not occur. This will allow the participant making the request to correct data

that prevented the match, if the decedent's informant is able to obtain information that is more accurate.

3. **Use of Information Technology to Collect the Information**

Both Death Match processes are automated electronic transfers between the States and SSA and are compliant with the Government Paperwork Elimination Act. However, EDR is a web-based system that links all the State participants via the Internet. The States will tag the records that verify using the on-line verification process. Once SSA receives the batch file, SSA will immediately direct the records with verified numbers to a termination process. The process eliminates the need for the field to independently verify State death reports for these individuals and to later input these death reports for termination. Therefore, EDR automates the death registration process for the States, which allows SSA to fully automate its death termination process.

In accordance with the agency's Government Paperwork Elimination Act plan, SSA created an Internet version State Death Match Collection. Based on our data, we estimate approximately 100% of respondents under this OMB number use the electronic version.

4. **Why We Cannot Use Duplicate Information**

The information collected for the online verification in death registration precludes duplication. While the Form SSA-721 (OMB No. 0960-0142) collects data similar to that currently collected in the death registration process, EDR is slowly phasing it out. Because the EDR provides timely verified fact of death reports to SSA, which SSA considers proof of death, funeral directors will no longer submit the paper SSA-721 for death records to SSA once all states implement the EDR system.

5. **Minimizing Burden on Small Respondents**

This collection does not significantly affect small businesses or other small entities.

6. **Consequences of Not Collecting Information or Collecting it Less Frequently**

If we did collect death registration information from each decedent, we would jeopardize the accuracy of the Agency's payment files, as well as the payment files of the four federal benefit-paying agencies that also use this information. Because we only collect the information once, we cannot collect it less frequently.

There are no technical or legal obstacles to burden reduction

7. **Special Circumstances**

There are no special circumstances that would cause SSA to conduct this information collection in a manner inconsistent with 5 CFR 1320.5.

8. **Solicitation of Public Comment and Other Consultations with the Public**  
 The 60-day advance Federal Register Notice published on November 24, 2010, at 75 FR 71785, and SSA has received no public comments. The second Notice published on February 14, 2011 at 76 FR 8394, and SSA has received no public comments.

9. **Payments or Gifts to Respondents**  
 SSA provides no payment or gifts to the respondents.

10. **Assurances of Confidentiality**  
 SSA protects and holds confidential the information it collects in accordance with 42 U.S.C. 1306, 20 CFR 401 and 402, 5 U.S.C. 552 (Freedom of Information Act), 5 U.S.C. 552a (Privacy Act of 1974), and OMB Circular No. A-130.

11. **Justification for Sensitive Questions**  
 The online verification system is a secure environment. The information collected during the online verification process is confidential. SSA published a routine use to notify the public.

12. **Estimates of Public Reporting Burden**

Collection Format	Number of Respondents	Frequency of Responses (per state)	Average cost per record request	Estimated Annual Cost Burden
State Death Match—VISN/eVISN/Connect Direct	23	50,000	.80	\$920,000
State Death Match-EDR	30	50,000	\$2.86	\$4,290,00
<b>Totals</b>	53			*5,210,000

Please note that both of these data matching processes are electronic and there is no hourly burden for the respondent to provide this information.

13. **Annual Cost to the Respondents**  
 This collection does not impose a known cost burden on the respondents. However, before a State can participate in the EDR process there is start-up and systems infrastructure cost which they must assume. SSA is offsetting part of this expense as outline in item 14. The costs to States for EDR implementation range between \$2-5 million

14. **Annual Cost to Federal Government**  
 The annual cost to the Federal Government for the Manual Registration is approximately \$8,184. This estimate is a projection for the cost for printing and distributing the collection instrument.

The estimated cost to the Federal Government to collect the information for the EDR process is negligible. Because the cost of maintaining the system which collects this information is accounted for within the cost of maintaining all of SSA's automated systems, it is not possible to calculate the cost associated with just one Internet application.

15. **Program Changes or Adjustments to the Information Collection Budget**  
There will be a program increase in SSA's overall information collection budget because this is the initial clearance for collection of death data. As explained in #4, above, as more states implement the use of the EDR, they will discontinue the use of the SSA-721. Therefore, the burden hours for the SSA-721 will decrease, and the number of respondents for this collection will increase.
16. **Plans for Publication of Results of Information Collection**  
SSA will not publish the results of the information collection.
17. **Request not to Display OMB Expiration Date**  
SSA is not requesting an exception to the requirement to display an expiration date.
18. **Exceptions to Certification Statement**  
SSA is not requesting an exception to the certification requirements at 5 CFR 1320.9 and related provisions at 5 CFR 1320.8(b)(3).

**B. Collections of Information Employing Statistical Methods**

SSA does not use statistical methods for this information collection.