

**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**

**OMB No. 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 (Act)* terminates when the beneficiary dies. Section 205 (r) of the *Act* requires the Commissioner of the Social Security Administration (SSA) to contract with states to obtain death certificate information in order to compare it to SSA payment files. This process ensures the accuracy of our payment files by detecting unreported or inaccurate deaths of beneficiaries.

*The Code of Federal Regulations, 20 CFR 404.301; 404.310-311; 404.316; 404.330-341; 404.350-352; 404.371; and 416.912, set forth how a Social Security beneficiary's death affects a person's entitlement under the Act.*

**2. Description of Collection**

Approximately 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 Social Security benefits. As regulated, states must furnish the death information to SSA to compare to SSA's 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 a "manual registration" process or via 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 manual registration process is a slow, paper-driven process that begins with the funeral director, charged by state law with completing the demographic information on the deceased, such as name, date of birth, Social Security number (SSN) and sex code on the death certificate. The funeral director 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 a state's department of vital statistics where it is officially registered. While the state process is manual, the transfer of information to SSA is automated. The states forward this information to SSA, using current electronic technology (i.e. CyberFusion).

**EDR Process**

The EDR process is web-based. The system permits electronic transfer of the death certificate from 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 the death registration process. EDR results in the state's ability to send SSA the report within 5 days of the date of death, and within 24 hours of receipt in the state's repository.

Requests for online verification of the deceased's SSN passes through the state's 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 online verification system uses the decedent's demographic information, i.e., SSN, name, date of birth, and sex to match with SSA's records. The response either indicates the information is a match, indicating it is an accurate report, or it will give a code indicating why a match did not occur. This allows the participant making the request to verify and correct data that prevented the match, or obtain more accurate information.

States have agreed that the online verification of the SSN at the first point of collection in the registration process, i.e., the funeral director, satisfies the requirement to independently verify the SSN. This action allows SSA to immediately terminate the deceased's benefits and save \$36-42 million in program dollars and over 102 work years annually. SSA shares death data with the following federal benefit-paying agencies: Office of Personnel Management, Department of Defense - Department of Manpower Data Center, Railroad Retirement Board, Department of Health and Human Services (HHS) - Centers for Medicare and Medicaid Services, HHS - Health Resources and Service Administration, Department of Veterans Affairs, Internal Revenue Service, Pension Benefit Guarantee Corporation and United States Department of Agriculture. We expect these agencies have similar savings.

### **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 tag the records that verify using the on-line verification process. Once SSA receives the batch file, SSA immediately directs 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 percent 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, use of EDR is decreasing the use of the form SSA-721. Because 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 not collect death registration information for each deceased beneficiary, we would jeopardize the accuracy of SSA's payment files, as well as the payment files of the 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**  
SSA published the 60-day advance Federal Register Notice published on March 28, 2014, at 79 FR 17632, and we received no public comments. We published the 30-day Notice on July 2, 2014 at 79 FR 37828, and SSA has received no public comments. The first Federal Register Notice shows incorrect burden information for the Death Match Collections process. We have corrected for this in the second Notice, in #12 below, and on ROCIS.
- 9. Payments or Gifts to Respondents**  
SSA provides no payment or gifts to the respondents except for the remuneration stated in the contract for each processed record. Additional information on payment can be found below in the chart in item 12.
- 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**

As explained in item 2, both of these data matching processes are electronic and there is no hourly burden for the respondent to provide this information.

Type of Process	Modality of Collection	Number of Respondents	Frequency of Responses (per site)	Contracted cost per record	Estimated Total Annual Cost Burden
<b>Manual processing</b>	State Death Match— CyberFusion: Non-EDR Records from EDR sites	37	11,000	\$0.84	\$341,880
	State Death Match— CyberFusion: Non-EDR sites	16	62,000	\$0.84	\$833,280
	<b>Total: Non-EDR</b>	53	NA	NA	\$1,175,160
<b>EDR processing</b>	State Death Match-EDR	37	43,000	\$3.01	\$4,788,910
	States Expected to Become – State Death Match-EDR Within the Next 3 Years*	7	43,000	\$3.01	\$906,010
	<b>Totals: EDR and Expected EDR</b>	44	NA	NA	\$5,694,920

We estimated the frequency of responses by taking the total number of actual records received for calendar year 2013 for each category and dividing by the number of respondents, per category. Since the use of EDR is not mandatory in every state, we can still receive death reports through the ‘manual’ process, even if a site is considered ‘EDR.’ We reflect this estimated break down in the two rows for ‘Manual Processing.’

\*Over the next three years, several sites have indicated an interest in becoming an EDR site. While each site that has signaled an interest may not be able to implement EDR for technical or budgetary reasons, we capture the estimated figures for these sites in the second ‘EDR Processing’ row.

**13. Annual Cost to the Respondents**

There is no known cost burden to the respondents above and beyond the customary expenses already incurred.

**14. Annual Cost to Federal Government**

The annual cost to the Federal Government for the manual process 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 are no program changes to this collection. However, we are making an adjustment to the cost burden and removing the collection instrument under states' startup costs for transitioning to the EDR process. SSA no longer imposes a fee for startup costs.

**16. Plans for Publication of Results of Information Collection**

SSA will not publish the results of the information collection. Usage of data is limited to the requirements of Section 205 (r) of the Social Security Act.

**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.