

Supporting Statement for State Death Match Collections
20 CFR 404.301, 404.310-404.311, 404.316, 404.330-404.341,
404.350-404.352, 404.371, and 416.912
OMB No. 0960-0700

A. Justification

1. Introduction/Authoring 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, and 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, 404.310-404.311, 404.316, 404.330-404.341, 404.350-404.352, 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 2.6 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 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.

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 and Government Services Online (GSO)).

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 6 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 information that is more accurate.

States 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 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.

The respondents are the states' bureaus of vital statistics.

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 field personnel to verify state death reports for these individuals independently, and to input these death reports for termination later. Therefore, EDR automates the death registration process for the states, which allows SSA to automate its death termination process fully. 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, we expect 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 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**

The 60-day advance Federal Register Notice published on May 30, 2017, at 82 FR 24767, and we received no public comments. The 30-day FRN published on August 29, 2017 at 82 FR 41085. If we receive any comments in response to this Notice, we will forward them to OMB.
- 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 is in the chart in item 12 below.
- 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.

Modality of Collection	Number of Respondents	Frequency of Responses	Average Cost Per Record Request	Estimated Total Annual Burden (hours)
State Death Match-CyberFusion /GSO: Non-EDR Records from EDR sites	45	3,700	\$0.88	\$146,520
State Death Match-CyberFusion /GSO: Non-EDR sites	12	48,000	\$0.88	\$506,880
Total: Non-EDR	57			\$653,400
State Death Match-EDR	45	48,500	\$3.17	\$6,918,525
States Expected to Become – State Death Match-EDR Within the Next 3 Years**	7	62,600	\$3.17	\$1,389,094
Totals: EDR and Expected EDR	52	NA	NA	\$8,307,619
Grand Totals	109			\$8,961,019*

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

We estimated the frequency of responses by taking the total number of actual records received for calendar year 2016 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 we consider a site ‘EDR.’ We reflect this estimated break down in the two rows for ‘Manual Processing.’

**Over the next three years, several sites indicated an interest in becoming an EDR site. While each site that 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 beyond the customary expenses already incurred and reported in the chart in #12.

14. Annual Cost to Federal Government

The annual cost to the Federal Government for this collection is approximately \$8,184. This estimate accounts for costs from the following areas: (1) designing, printing, and distributing the form; (2) SSA employee (e.g., field office, 800 number, DDS staff) information collection and processing time; and (3) systems development, updating, and maintenance costs.

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 to reflect current figures.

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 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.