

Supporting Statement A for Request for

Revision

National Vital Statistics Report Forms

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Attachment List

- Attachment A: Authorizing Legislation
- Attachment B1: 60-day Federal Register Notice
- Attachment B2: Public Comments to the 60-day Federal Register Notice
- Attachment C: Monthly Vital Statistics Report Form
- Attachment D: Annual Vital Statistics Occurrence Report
- Attachment E: IRB Documentation

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

- Goal of the project: These are the data collection forms used by State and/or county vital registration offices to report to the Federal government (a) provisional counts of births, deaths, and infant deaths, at the end of each month and (b) annual counts of marriages and divorces/annulments¹ in support of the National Vital Statistics System.
- Intended use of the resulting data: 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. These data complement the U.S. Vital Statistics program and serve as the basis for weighting provisional surveillance estimates of birth and death. They also provide surveillance for change in trends in the various vital events being tracked. Marriage and divorce data collected annually permit uninterrupted tracking of family dynamics.
- Methods to be used to collect: Data collection is accomplished by the respondent replying to an email message with the completed form. New Mexico counties are the exception; respondents complete and return a paper form via the U.S. postal service.
- The subpopulation to be studied: These data represent a complete census (100% sample) 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.
- How data will be analyzed: This is an ongoing data collection system that captures provisional counts of births, deaths, and infant deaths at the end of each month and annual counts of marriages and divorces/annulments.

A. Justification

This is a request for a three-year revision for the National Vital Statistics Report Forms (OMB 0920-0213, Exp. Date April 30, 2018). These are the data collection forms used by State and/or county vital registration offices to report to the Federal government (a) provisional counts of births, deaths, and infant deaths at the end of each month and (b) annual 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.

The nonsubstantive change request approved on March 11, 2016 deleted the monthly reporting of marriages and divorces/annulments counts from the monthly form. Consequently, the 33 individual counties in New Mexico, which previously completed the monthly reports in order to provide marriage and divorce information, now, only need to submit the annual reports. In turn, the former 91 respondents to the monthly reports has now been reduced to 58. Meanwhile, the former number of annual respondents has increased from 58 to 91, capturing all of 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 jurisdiction, as well as the 33 individual counties in New Mexico.

1. Circumstances Making the Collection of Information Necessary

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 data are obtained from each State and some counties at the end of each month using the form provided in Attachment C. Provisional counts of births, deaths, infant deaths, marriages, and divorces through 2009, are disseminated electronically at http://www.cdc.gov/nchs/products/nvsr/monthly_provisional_notice.htm.

Similar data have been published since 1937 and are the sole source of these data at the national level. 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 (<http://www.cdc.gov/nchs/mardiv.htm>). This form (Attachment D) is the sole source of final counts for these two events. 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)

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. These data complement the U.S. Vital Statistics program and serve as the basis for weighting provisional surveillance estimates of birth and death. 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.

3. Use of Improved Information Technology and Burden Reduction

Respondents are allowed to submit the data in an existing format if that would reduce the burden; however, they are 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. To help further facilitate the electronic transmission of final marriage and divorce counts, an NCHS e-mail address is provided in the instructions for both reporting forms. These policies hold respondent burden to a minimum. There are no legal obstacles to reduce the burden.

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, **and infant deaths** 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.

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 82, No. 238, on 12/13/2017, pp. 58607 – 58608 (see attachment B1). CDC received two non-substantive comments (see attachment B2).

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 2017 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:

Shawna A. Webster, Executive Director

National Association for Public Health Statistics and Information Systems (NAPHSIS)
962 Wayne Avenue, Suite 701
Silver Spring, MD 20910
Phone: 301-563-6004
Email: hq@naphsis.org

There are no unresolved issues.

9. Explanation of Any Payment or Gift to Respondents

No payment is made. The requirement to submit marriage and divorce counts is tied to the deliverable for Birth data.

10. Protection of the Privacy and Confidentiality of Information Provided by Respondents

The NCHS Privacy Act Liaison and NCHS Confidentiality Officer have reviewed 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 are 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.

A Privacy Impact Assessment for the National Vital Statistics System was submitted on **March 15, 2017**.

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 **C and D**).

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

11. Institutional Review Board (IRB) and Justification For Sensitive Questions

This data collection is not subject to the requirements of an Institutional Review Board (Attachment E).

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

12. Estimates of Annualized Burden Hours and Costs

Respondents for the Monthly Vital Statistics Report Form are the 58 registration officials in each State and Territory, the District of Columbia, and New York City. 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 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 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 other officials	Monthly Vital Statistics Report	58	12	8/60	93
State, Territory and New Mexico County officials	Annual Vital Statistics Occurrence Report	91	1	30/60	46
Total					139

At an average wage rate of \$24.77 per hour and an average length of interview of 8 minutes, the average cost per respondent is \$3.30 to complete the monthly form. At an average wage rate of \$24.77 per hour and an average length of interview of 30 minutes, the average cost per respondent is \$12.39 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
139	\$24.77	\$3,443

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

None.

14. Annualized Cost to the Federal Government

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

15. Explanation for Program Changes or Adjustments

This submission contains no changes to the actual data collection forms. However, the respondent numbers for the monthly and annual forms have shifted from 91 and 58 respectively

to 58 and 91, since the 33 New Mexico Counties only send marriage and divorce information that is now only captured in the annual report. Consequently, the total burden has been reduced from 175 hours to 139 hours.

16. 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 through the website: http://www.cdc.gov/nchs/products/nvsr/monthly_provisional_notice.htm. 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.

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

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

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.