

**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 2.9 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 SSA-721, Statement of Death by Funeral Director (OMB Control No. 0960-0142) is the manual registration 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) portal).

### **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 saves the Federal government \$36-42 million in program dollars and over 102 work years annually. SSA shares death data with the following federal benefit-paying or research agencies: Office of Personnel Management; Department of Defense - Department of Manpower Data Center; Railroad Retirement Board; Federal Retirement Thrift Investment Board; Department of Housing and Urban Development; Department of Health and Human Services (HHS) - Centers for Medicare and Medicaid Services; HHS - Health Resources and Service Administration; HHS - National Institute of Health; 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 Internet 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 one of the two electronic versions (EDR or submission through an online portal).

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

The information we collect 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 December 30, 2020, at 85 FR 86638, and we received no public comments. The 30-day FRN published on March 1, 2021 at 86 FR 12068. If we receive any comments in response to this Notice, we will forward them to OMB. We did not consult with the public in the revision of this form.

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**

Modality of Completion	Number of Respondents	Frequency of Response	Average Cost Per Record Request	Estimated Total Annual Burden (hours)	Average Theoretical Hourly Cost Amount (dollars)**	Total Annual Opportunity Cost (dollars)***
State Death Match-CyberFusion/G SO: Non-EDR Records from EDR sites	39	68,621	\$0.88	\$2,355,073	\$21.09**	\$1,447,217***
State Death Match-CyberFusion/G SO: Non-EDR sites	5	187,570	\$0.88	\$825,308	\$21.09**	\$3,955,851***
<b>Total: Non-EDR</b>	<b>44</b>			<b>\$3,180,381</b>		<b>\$5,403,068</b>
State Death Match-EDR	48	2,573,956	\$2.05	\$253,277,270	\$21.09**	\$54,284,732***
States Expected to Become – State Death Match-EDR Within the Next 3 Years**	5	62,600	\$3.17	\$992,210	\$21.09**	\$1,320,234***
<b>Totals: EDR and Expected EDR</b>	<b>53</b>			<b>\$254,269,480</b>		<b>\$55,604,966***</b>
<b>Grand Totals</b>	<b>97</b>			<b>\$257,449,861</b>		<b>\$61,008,034***</b>

\*Please note that both of these data matching processes are electronic, and nearly immediate. Therefore, 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 2020 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.

\*\*We based this figure on the average Records Clerk hourly wages as reported by Bureau of Labor Statistics data ([https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm)).

\*\*\*This figure does not represent actual costs that SSA is imposing on recipients of Social Security payments to complete this application; rather, these are theoretical opportunity costs for the additional time respondents will spend to complete the application. **There is no actual charge to respondents to complete the application.**

We base our burden estimates on current management information data, which includes data from actual interviews, as well as from years of conducting this information collection. Per our management information data, we believe that 10 minutes accurately shows the average burden per response for reading the instructions, gathering the facts, and answering the questions. Based on our current management information data, the current burden information we provided is accurate. The total burden for this collection instrument is **0** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$294,778**. SSA does not charge respondents to complete our applications.

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 is approximately **\$23,362**. This estimate accounts for costs from the following areas:

<b>Description of Cost Factor</b>	<b>Methodology for Estimating Cost</b>	<b>Cost in Dollars*</b>
Designing and Printing the Form	Design Cost + Printing Cost	\$0
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	\$0
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	\$8,184
Full-Time Equivalent Costs	Out of pocket costs + Other expenses for providing this service	\$0
Systems Development, Updating, and Maintenance	GS-9 employee x man hours for development, updating, maintenance	\$15,178
Quantifiable IT Costs	Any additional IT costs	\$0
<b>Total</b>		<b>\$23,362</b>

\* We have inserted a \$0 amount for cost factors that do not apply to this collection.

SSA is unable to break down the costs to the Federal government further than we already have. First, since we work with almost every US citizen, we often do bulk mailings, and cannot track the cost for a single mailing. In addition, it is difficult for us to break down the cost for processing a single form, as field office and State Disability Determination Services staff often help respondents fill out several forms at once, and the time it takes to do so can vary greatly per respondent. As well, because so many employees have a hand in each aspect of our forms, we use an estimated average hourly wage, based on the wage of our average field office employee (GS-9) for these calculations. However, we have calculated these costs as accurately as possible based on the information we collect for creating, updating, and maintaining these information collections.

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.