

Supporting Statement A for Request for
Revision for the Discontinuation of the Monthly Vital
Statistics Report Form

National Vital Statistics Report Form

OMB No. 0920-0213

Exp. Date October 31, 2023

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Attachment List

- Attachment A: Authorizing Legislation
- Attachment B: 60-day Federal Register Notice
- Attachment C: Annual Vital Statistics Occurrence Report
- Attachment D: IRB Documentation

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

- Goal of the project: To continue use of the Annual Vital Statistics Report Form, which is used by State and/or county vital registration offices to report annual counts of marriages, and divorces/annulments to the Federal government in support of the National Vital Statistics System, and to discontinue the use of the Monthly Vital Statistics Report, which has been used to provide counts of monthly occurrences of births, deaths, and infant deaths. Data on counts of births, deaths, and infant deaths are now received on a more timely, ongoing basis, and therefore the monthly form is no longer needed.
- 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. These data complement the U.S. Vital Statistics program and the data collected previously using the Monthly Vital Statistic Report serve as the basis for weighting provisional surveillance estimates of birth and death. Marriage and divorce data collected annually permit uninterrupted tracking of family dynamics.
- Methods to be used to collect: Data collection of annual marriage and divorce/annulments is accomplished by the respondent replying to an email message with the completed Annual Vital Statistics Report form. New Mexico counties are the exception; respondents only provide the annual marriage counts a) complete and return a paper form via the U.S. postal service and/or b) reply to an email message with the completed form either by email or fax. The electronic files containing the births, deaths, and infant deaths are being sent either weekly or daily. This is a lot faster than the previous monthly counts.
- 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: The Annual Vital Statistics Report is an ongoing data collection system that captures annual counts of marriages, and divorces/annulments.

A. Justification

This is a request for a revision to discontinue the Monthly Vital Statistics Report Form of the National Vital Statistics Report Form (OMB 0920-0213, Exp. Date October 31, 2023) and to continue the use of the Annual Vital Statistics Report (OMB 0920-0213, Exp. Date October 31, 2023). The Monthly Vital Statistics Form was used to collect the monthly birth, death, and infant death counts from states and territories. This information is now arriving via electronic files in a timelier manner than the report provides and is received from the states and territories either daily or weekly. Previously the counts were received monthly.

The Annual Vital Statistics Occurrence Report (Attachment C) is used by State and/or county vital registration offices to report to the Federal government 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. Final counts of marriages and divorces are requested from all 50 States, District of Columbia, New York City, American Samoa, Guam, Commonwealth of the Northern Mariana Islands, Puerto Rico, Virgin Islands, as well as the counties of New Mexico for all months of a given year.

1. Circumstances Making the Collection of Information Necessary

The compilation of national vital statistics by the Federal government dates 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 follow back 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 marriages, and divorces following the end of each year. The collection of the data is authorized by 42 USC 242k, a copy of which is provided in Attachment A. Provisional counts of births, deaths, infant deaths, marriages, and divorces through 2021, are disseminated electronically at http://www.cdc.gov/nchs/products/nvsr/monthly_provisional_notice.htm.

These data has been published since 1937 and are the sole source of this information 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. These final counts are usually available from State officials and New Mexico County Clerks 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 provisional data on vital events, including marriage and divorce, 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. The data on marriage and divorce counts complement the U.S. Vital Statistics program and served as the basis for weighting provisional surveillance estimates of marriage and divorce. They also provide surveillance for changes 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 these events.

3. Use of Improved Information Technology and Burden Reduction

All 50 States, US Territories, including New York City and Washington DC, as well as New Mexico's counties are allowed to submit the Annual Vital Statistics Report Form either electronically or on paper if that would reduce the burden; however, they are encouraged to submit the data by electronic mail whenever possible. For provisional birth and death data, all States are now reporting electronically on an ongoing basis, negating the need to collect these data using the Monthly Vital Statistics Report Form. To help further facilitate the electronic transmission of final marriage and divorce counts, an NCHS e-mail address is provided in the instructions for the Annual Vital Statistics Report Form. These policies are intended to keep 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 these events.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

Provisional data are collected monthly 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 on January 7, 2022, Vol. 87, No.5, pp. 976 – 977 (see attachment B). No comments were received.

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 2021) 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 Webster, Executive Director
National Association for Public Health Statistics and Information Systems (NAPHSIS)
8705B Colesville Road, #348
Silver Spring, MD 20910
Phone: 301-563-6004
Email: hq@naphsis.org

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 the Vital Statistics Cooperative Program, the contractual relationship between each state and NCHS for collection and dissemination of vital statistics data at the national level.

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

We take your privacy very seriously. All information that relates to or describes identifiable characteristics of individuals, a practice, or an establishment will be used only for statistical purposes. NCHS staff, contractors, and agents will not disclose or release responses in identifiable form without the consent of the individual or establishment in accordance with section 308(d) of the Public Health Service Act (42 U.S.C. 242m(d)) and the Confidential Information Protection and Statistical Efficiency Act of 2018 (CIPSEA Pub. L. No. 115-435, 132 Stat. 5529 § 302). In accordance with CIPSEA, every NCHS employee, contractor, and agent has taken an oath and is subject to a jail term of up to five years, a fine of up to \$250,000, or both if he or she willfully discloses ANY identifiable information about you. **In addition to the above cited laws, NCHS complies with the Federal Cybersecurity Enhancement Act of 2015 (6 U.S.C. §§ 151 and 151 note) which protects Federal information systems from cybersecurity risks by screening their networks.**

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.

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 attachment C).

Annual counts of marriages, divorces and annulments are 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 D).

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

12. Estimates of Annualized Burden Hours and Costs

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

At an average wage rate of \$16 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
46	\$24.77	\$1,140

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

Currently there are 139 burden hours in the OMB inventory. We are requesting 46 total burden hours. This program change is due to the decrease of 93 hours because of the revision to discontinue the use of the monthly report for birth, death, and infant death.

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. 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.