**Justification for Non-Substantive Changes for Form SSA-721**

**Statement of Death by Funeral Director , and State Death Match**

**20 CFR 404.715 and 404.720**

**OMB No. 0960-0142**

**Background**

The Social Security Administration (SSA) provides death benefit payments to the appropriate surviving family member when an SSA-insured worker dies. Before making these payments, SSA must obtain evidence of the insured individual’s death. As regulated, states must furnish death information to SSA to compare to SSA’s payment files. SSA uses the State Death Match

(0960-0700) 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.

Form 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. SSA uses Form SSA-721, Statement of Death by Funeral Director, to obtain a funeral director’s confirmation of death for an SSA covered individual. SSA considers a funeral director’s statement to be a preferred type of such evidence (as per *20 CFR 404.720*).

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.

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.

**Revisions to the Information Collection**

* **Change #1:**

We are combining the two information collection packages OMB number 0960-0142: Form SSA-721 Statement of Death by Funeral Director and OMB No. 0960-0700: State Death Match Collections under one OMB number 0960-0142.

**Justification #1:**

We are combining these two information collections under one OMB number 0960-0142 as per OMB’s Terms of Clearance.

* **Change #2:**

We are updating the Estimates of Public Reporting Burden chart in the OMB No. 0960-0142 to include the EDR as a Modality of Completion.

**Justification #2:**

We are removing the Estimates of Public Reporting Burden information from OMB No.

0960-0700 and adding it to Estimates of Public Reporting Burden chart in OMB No.

0960-0142 to combine the two modalities SSA-721 and EDR in one chart.

**SSA-721**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Modality of Completion** | **Number of Respondents** | **Frequency of Response** | **Average Burden per Response (minutes)** | **Estimated Total Annual Burden (hours)** | **Average Theoretical Hourly Cost Amount (dollars)\*** | **Total Annual Opportunity Cost (dollars)\*\*** |
| SSA-721 | 544,233 | 1 | 4 | 36,282 | $28.04\* | $1,017,347\*\* |

**EDR**

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Modality of Completion** | **Number of Respondents** | **Frequency of Response** | **Average Cost Per Record Request** | **Estimated Total Annual Burden (hours)** | **Estimated Total Annual Burden hours Cost** | **Average Theoretical Hourly Cost Amount (dollars)\*\*** | **Total Annual Opportunity Cost (dollars) \*\*\*** |
| State Death Match‑CyberFusion/GSO: Non-EDR Records from EDR sites | 39 | 68,621 | $0.88 | 2,676.219 | $2,355,073 | $21.09\*\* | $1,447,217\*\*\* |
| State Death Match‑CyberFusion/GSO: Non-EDR sites | 5 | 187,570 | $0.88 | 937,850 | $825,308  | $21.09\*\* | $3,955,851\*\*\* |
| **Total: Non-EDR** | **44** |  |  |  | **$3,180,381** |  | **$5,403,068** |
| State Death Match- EDR | 48 | 2,573,956  | $2.05 | 123,549,888 | $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 | 313,000 | $992,210 | $21.09\*\* | $1,320,234\*\*\* |
| **Totals: EDR and Expected EDR** | **53** |  |  |  | **$254,269,480** |  | **$55,604,966\*\*\*** |
| **Combined EDR Totals** | **97** |  |  |  | **$257,449,861** |  | **$61,008,034\*\*\*** |
| **Grand Total**  | **544,330** |  |  | **128,021,190** | **$257,449,861** |  | **$62,025,381\*\*\*** |

After OMB approves the change request for OMB No. 0960-0142 to combine these two information collections, SSA will submit a request for the discontinuation of Information Collection OMB No. 0960-0700.