

Supporting Statement A for Request for Clearance:

Application Form and Related Forms for the
Operation of the National Death Index

Reinstatement
OMB No.0920-0215

(Expiration Date May 31, 2026)

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Table of Contents

A. Justification.....	3
1. Circumstances Making the Collection of Information Necessary.....	4
2. Purpose and Use of the Information Collection.....	4
3. Use of Improved Information Technology and Burden Reduction.....	5
4. Efforts to Identify Duplication and Use of Similar Information.....	5
5. Impact on Small Businesses or Other Small Entities.....	5
6. Consequences of Collecting the Information Less Frequently.....	5
7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5.....	6
8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency.....	6
9. Explanation of Any Payment or Gifts to Respondents.....	6
10. Protection of the Privacy and Confidentiality of Information Provided by	Respondents.
11. Institutional Review Board (IRB) and Justification for Sensitive Questions.....	8
12. Estimates of Annualized Burden Hours and Costs.....	9
13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers...	9
14. Annualized Cost to the Federal Government.....	10
15. Explanation for Program Changes or Adjustments.....	10
16. Plans for Tabulation and Publication and Project Time Schedule.....	10
17. Reason(s) Display of OMB Expiration is Inappropriate.....	10
18. Exceptions to Certification for Paperwork Reduction Act Submissions.....	10

ATTACHMENTS TO SUPPORTING STATEMENT FOR OMB CLEARANCE REQUEST

- A – Authorizing Legislation
- B1 – Published 60-Day Federal Register Notice
- B2 – Public Comment to the 60-Day Federal Register Notice and Program Response
- C – National Death Index Application Form (Electronic Version)
- D1 – NDI User Data Transmittal Form
- D2 – NDI User Data Early Release Transmittal Form
- E1 – Fee Worksheet
- E2 – Early Release Fee Worksheet
- F – Data Destruction Form
- G1 – NDI Data Use Agreement
- G2 – Supplemental NDI Data Use Agreement
- H – National Death Index Advisers
- I – NCHS ERB letter

**Supporting Statement A for Request for Clearance:
Application Form and Related Forms for the Operation of the National Death Index**

- Goal of the project: The National Death Index (NDI) and the services it provides allows NCHS to collect mortality data to support epidemiological research and to furnish mortality information to approved public health and medical investigators.
- Intended use of the resulting data: The NDI is a central, computerized index of death record information designed to assist in the mortality ascertainment activities of investigators conducting prospective and retrospective studies in health and medical projects and studies.
- Methods to be used to collect: Investigators submit these forms to apply for the use of the NDI and then when actually using the service.
- The subpopulation to be studied: The National Death Index contains all deaths in the United States since 1979.
- How data will be analyzed: The collection of information is for administrative purposes and does not employ any statistical methods.

This is a reinstatement with change request for a three-year clearance to use of the administrative forms (the application forms and transmittal forms) and the fee worksheets, plus the data destruction form and the NDI data use agreement forms utilized in the operation of the National Death Index (NDI) program (OMB No. 0920-0215, Exp. Date May 31, 2026), while also making allowances for an early release component. These forms/worksheets are submitted by NDI users when applying for use of the NDI via the electronic NDI Portal and when using the service. Overall, the estimated annual numbers of application and transmittal forms are anticipated to increase, with the overall annual estimated burden increasing from 1,275.5 to 1,373.4 hours.

A. Justification

1. Circumstances Making the of Collection Information Necessary

The National Death Index (NDI) and the services it provides are authorized under 42 USC 242k (Section 306 of the Public Health Service Act) which mandates that NCHS collect mortality data and which permits NCHS to support epidemiological research and to furnish mortality information (see Attachment A).

The NDI is a central, computerized index of death record information designed to assist in the mortality ascertainment activities of investigators conducting prospective and retrospective studies in health and medical projects and studies. The NDI contains identifying information on

all U.S. decedents since 1979 and is compiled from electronic data submitted to NCHS by vital statistics jurisdiction (states and territories) offices via contractual agreements.

Investigators use the NDI to determine whether persons in their studies may have died. If so, the NDI user is provided with the corresponding dates of death, names of jurisdictions in which the deaths occurred and the related death certificate numbers. The NDI user may then apply to the respective jurisdictions to procure copies of the death certificates from their vital statistics offices in order to obtain other information such as cause of death. NDI users can reduce the need for procuring copies of certificates if they opt for the NDI Plus service, which provides users with the cause(s) of death information in coded form.

The NDI Application Form is provided / made available to all investigators who express an interest in the NDI. While the Application Form and accompanying forms (Attachments F-G2) are completed and submitted only by those investigators who actually decide to apply for use of the NDI services, the remaining forms (Attachments D-E2) are sent to the investigators after their Application Forms are approved. Additional information on the NDI can be found at its website <http://www.cdc.gov/nchs/ndi.htm>.

2. Purpose and Use of Information Collection

The National Death Index (NDI) contains all deaths in the United States since 1979. As of 2025 the NDI has obtained over 117 million death records from the jurisdiction vital statistics offices, covering deaths from 1979 through 2025. The death records are obtained via a contract with each jurisdiction vital statistics office. The purpose of the NDI is to assist health researchers in determining whether their study subjects have died and if so, provides the researchers with the jurisdiction of death, date of death, death certificate number and the causes of death (as reported on the jurisdiction's death certificates). The encrypted death records are maintained in the SQL server data management system. The NDI has served over 4,500 researchers over the period 1982-2025. The research studies or projects varied greatly and included: clinical trials, disease registries, occupational health studies, non-disease or population registries, and effectiveness of specific therapies for different diseases.

Historically, before a particular calendar year of deaths can be made available for NDI searches, the National Center for Health Statistics must receive, process, and edit death records from ALL 50 state vital statistics offices plus New York City, Washington D.C., Puerto Rico, the U.S. Virgin Islands, Guam, American Samoa and Northern Marianas. This is a very time-consuming process that often results in delays in the creation of the final NDI file for a particular year, currently 10-12 months after the end of that calendar year. In earlier years NDI users and staff expressed their frustrations with delays of 2-3 years. Consequently, the NDI initiated a new effort to make preliminary NDI files available for earlier searches. This effort was begun in 2013 and known as the Early Release Program.

The forms being proposed for this reinstatement with minor changes will be used solely for the administration of the NDI program. The forms are submitted by NDI users (investigators) when applying for use of the NDI and then when using the service (Attachment C through G2).

The National Death Index Application Form (Attachments C) is the first administrative form. The Data Destruction Form and the two NDI Data Use Agreements (Attachments F-G2) accompany the Application Form. These forms are completed by organizations and agencies who are conducting health and medical projects and studies and who would like to be approved for use of the NDI. NDI applications are reviewed by NCHS staff and advisers to the NDI program (Attachment H). The advisers review the applications by email approximately every three to four weeks.

The application forms are used by NCHS staff and advisers to determine (1) whether each proposed use of the NDI conforms with the criteria agreed upon between NCHS and the jurisdiction vital statistics offices; (2) how the applicant and any other participating organization(s) will maintain the confidentiality of the identifying death record information; and (3) whether the NDI applicant will be able to submit data on persons in the study in a manner which meets NCHS technical specifications.

The next administrative form is the User Data Transmittal Form (Attachment D1), which also offers an early release version (Attachment D2). Information provided on these otherwise identical forms is intended to clearly identify the user and to provide NCHS data processing staff with information needed to process the user's data. The forms permit users to request that their NDI output be sent to them via encrypted Secure File Transfer Protocol (sFTP) or CD-ROM. These forms are also used to show the total cost of the NDI services (calculated using fee worksheets E1 and E2) and how payment will be made.

Charges for the investigator requested records are calculated based on the number of years to be searched, the number of subjects within each search year, the vital status (known or unknown) of the subjects, and the provision of cause of death information. To be consistent with the user transmittal forms, there is a regular Fee Worksheet (Attachment E1) and an Early Release Fee Worksheet (Attachment E2).

3. Use of Improved Information

Technology and Burden Reduction

Respondent burden in this collection is held to a minimum. There are no technical or legal obstacles to burden reduction and improved information technology would not reduce burden; the electronic version of the NDI Application Form is accessed via the online NDI Portal or investigators can request from NDI staff a PDF version to "practice on."

4. Efforts to Identify Duplication and Use of Similar Information

The NDI is the only central computerized index of death records containing cause(s) of death on file in the jurisdiction vital statistics offices. Consequently, the NDI Application Form and related administrative forms used by health investigators to obtain use of the NDI service are unique to this program. Information obtained from NDI applicants pertains only to use of the NDI. Similar information is not available from other sources.

5. Impact on Small Businesses or Other Small Entities

There are no specific or ongoing reporting or recordkeeping requirements for small business. The type of administrative information collected by the NDI forms applies equally to large and small organizations. Use of the NDI is not affected by an organization's size. Questions on the forms have been held to the absolute minimum required for the intended use of the information.

6. Consequences of Collecting the Information Less Frequently

An NDI applicant must only submit one NDI Application Form (Attachment C accompanied by F-G2) to initiate use of the NDI for a particular study. The other NDI forms (Attachments D1-E2) come into play each time the NDI applicant wishes to submit data for a search of the NDI. About 40% of the NDI users only make one data submission. The remaining 60% of the users will submit data every one, two or three years as more years of deaths are added to the NDI file. Note that the Application Form and the Data Use agreements must be updated with every repeat search submission to ensure that there have been no significant changes in the initial NDI application information and to identify the user's records.

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

The project is in full compliance with all the guidelines in 5 CFR 1320.5.

8. Comments in Response to the Federal Register Notice and Efforts to Consult the Agency Outside

- A.** A 60d FRN was published on August 10, 2026 for the Application Form and Related Forms for the Operation of the National Death Index (NDI) (OMB Control No. 0920-0215)—Reinstatement—National Center for Health Statistics (NCHS), Centers for Disease Control and Prevention (CDC). One anonymous comment was received that indicated the FRN was posted incorrectly. However, both www.fdms.gov and www.regulations.gov indicated that the actions were taken correctly and that the Docket was made available for 60 days for public comment. The missing/blank document was the result of a system error. In response to the commenter, CDC posted a second 60d FRN and will respond to any comments received.
- B.** Advisers to the NDI program used to meet periodically to review the NDI's operations and its procedures for reviewing and approving NDI applications. The last in-person meeting of the advisers was in September 2020. They were satisfied with the availability of the requested information, the frequency of collection, the clarity of the instructions and the items of information being requested. A list of the NDI advisers, their telephone numbers, and the organizations they represent is presented in Attachment F. Please note

the four advisers employed by jurisdiction health departments: Jeff Duncan, Neeti Sethi, Mark Gildemaster, Monique E. Wilson.

9. Explanation of Any Payment or Gift to Respondents

There are no payments or gifts to respondents.

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

This submission has been reviewed for Privacy Act applicability, and it has been determined that the Privacy Act applies under Systems of Record Notice 09-20-0166: Vital Statistics for Births, Deaths, Fetal Deaths, Marriages and Divorces Occurring in the United States During Each Year.

The NDI Application Form and the other related NDI forms are used to ensure that NCHS maintains the confidentiality of the jurisdiction death record information and that such information is used only for the purposes described in the jurisdictions' contracts with NCHS. Additionally, the NDI forms are used to obtain assurances from the NDI user that the information obtained from NCHS will be kept confidential and will only be used for the study or project proposed by the user. NCHS is bound to maintain the confidentiality of the identifying death record information it obtains from the jurisdiction vital statistics offices. This is required under Section 308(d) of the Public Health Service Act (42 USC 242k) which states that "no information may be used for any purpose other than the purpose for which it was supplied..." Consequently, release by NCHS of data on decedents contained in the NDI file is restricted under Section 308(d) by the purpose for which the information was supplied to NCHS by the jurisdiction vital statistics office. In the case of the NDI, the purpose for which the death record information is supplied is clearly specified in the contracts between NCHS and each jurisdiction office. Each contract contains provisions restricting the use of the NDI to "statistical purposes in medical and health projects and studies and prohibiting use of the NDI as a basis for legal, administrative, or other actions, which may directly affect particular individuals or establishments."

A notice of privacy will be on each NDI form:

"CDC will keep the information you provide on the NDI application and forms private and secure to the extent permitted by law."

The application forms are all scanned and stored to a secure SharePoint drive as researchers often apply several times for data.

Items of Information Collected from the Jurisdiction's Death Certificates

In order to assist health researchers to determine if their subjects have died, a computer match must be performed using the following items of identifying information as part of the matching criteria:

- First name, last name, and middle initial
- Father's surname (especially for females)
- Social Security Number
- Date of birth
- Sex

Other data items obtained from the jurisdiction death records are:

- Race
- Marital status
- Jurisdiction of birth
- Jurisdiction of death
- Death certificate number
- Date of death
- Causes of death

Information in Identifiable Form (IIF) – Data Submitted on the Researcher's Study Subjects

For the NDI to be able to serve the health research community, it is essential that the NDI maintain the above data elements, most of which are Protected Health Information (PHI). To use the NDI a researcher must complete a detailed application describing his/her study and how confidentiality will be maintained. The application form must be accompanied by the researchers Institutional Review Board approval for the study that is being performed. Once the NDI Advisers review and recommend approval of the application, the researcher is able to submit records of study subjects who have been lost to follow up (or who have died) in order to find out their subjects' dates and causes of death. The researcher is encouraged to provide as many of the following IIF data elements as possible in order to maximize the NDI's matching effectiveness:

- First name, last name, and middle initial
- Father's surname (especially for females)
- Social Security Number
- Full Date of Birth, and Sex

The other NDI data items like race, marital status and jurisdiction of birth should also be provided by the researcher to assist him/her in assessing the match results and confirming which possible matches are in fact true matches.

Administrative Information Collected from Health Researchers (about themselves)

When health researchers submit their requests for use of NDI services, they must complete several administrative forms at various points in the NDI process. The following administrative forms are required: NDI Application Form and NDI Transmittal Form. Each of these forms requires the researcher to submit the following identifying information about themselves:

- Name and address of Principal Investigator, Co-Investigator, and Sponsors
- Name of organization
- Assigned NDI number
- Name and phone number of the person to contact for more information about the application or about the data submitted to the NDI by the researcher
- Name and address of person that will receive the NDI results via FedEx or sFTP.

The application forms also collect information about each researcher's study:

- Summary of the study protocol
- Name of study sponsor(s)
- How data confidentiality will be maintained
- Documentation of a current IRB approval
- The number of study subjects' records to be submitted for an NDI match
- The years of death to be searched
- When identifiable data obtained from the NDI will be disposed
- Signed NDI Data Use Agreements
- Data Destruction Form to complete at study close or when requesting a 5 yr extension

All of these data items have been collected and approved in previous Paperwork Reduction Act (PRA) submissions.

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

None of the forms request information of a sensitive nature. Furthermore, because the NDI does not involve information on living human subjects, it has been determined that the NDI does not require IRB approval (See Attachment G).

12. Estimate of Annualized Burden Hours and Cost

A. Estimates of Annualized Burden Hours

Type of Respondent	Form Name	No. of Respondents	No. of Responses per Respondent	Average Burden per Response (in hours)	Total Burden Hours
Researcher	Application Form - electronic	282	1	2.5	705
Researcher	Transmittal Form- Paper/Electronic	400	3	18/60	360
Researcher	Early Transmittal Form- Paper/Electronic	100	3	18/60	90

Researcher	Fee Worksheet	450	1	15/60	112.5
Researcher	Early Release Fee Worksheet	100	1	5/60	8.33
Researcher	Data Destruction Form	282	1	2/60	9.4
Researcher	NDI Data Use Agreement	282	1	5/60	23.5
Researcher	Supplemental NDI Data Use Agreement	130	1	30/60	65
Total					1,373.73

B. Estimates of Annualized Burden Cost to Respondents

The three administrative forms are completed by health researchers in government, universities, and private industry in order to apply for NDI services and to submit records of study subjects for computer matching against the NDI file.

The mean hourly earnings of "data scientists" (as of May 2025) was \$47.51 based on the U.S. Bureau of Labor Statistics National Occupational Employment and Wage Estimates. The BLS website for this information is: http://www.bls.gov/oes/current/oes_nat.htm

The total burden cost is estimated at \$85,370.72.

Total Annual Cost Burden

Type of Respondent	Form Name	No. of Respondents	No. of Responses per Respondent	Average Burden per Response (in hours)	Average Hourly Wage	Total Burden Cost
Researcher	Application Form - electronic	282	1	2.5	\$47.51	\$33,494.55
Researcher	Transmittal Form- Paper/Electronic	400	3	18/60	\$47.51	\$17,103.60
Researcher	Early Transmittal Form- Paper/Electronic	100	3	18/60	\$47.51	\$4,275.90
Researcher	Fee Worksheet	450	1	15/60	\$47.51	\$5,344.88
Researcher	Early Release	100	1	5/60	\$47.51	\$395.92

	Fee Worksheet					
Researcher	Data Destruction Form	282	1	2/60	\$47.51	\$446.59
Researcher	NDI Data Use Agreement	282	1	5/60	\$47.51	\$1,116.49
Researcher	Supplemental NDI Data Use Agreement	130	1	30/60	\$47.51	\$3,088.15

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

There is no respondent cost burden associated with capital or maintenance costs.

14. Annualized Cost to the Government

The average annual cost associated with the three administrative NDI forms is estimated to be \$133,000 per year. This cost includes the maintenance, correction, and augmentation of the electronic forms plus NCHS staff costs of about \$130,000 per year to process the forms.

15. Explanation for Program Changes or Adjustments

Currently, there are 1,276 total burden hours in the OMB inventory. We are requesting 1,374; a program change of an increase of 98 hours, due to the modest increases in the number of applications and transmittal forms. The NDI program receives approximately 220 new applications each year from 205 in the last submission.

16. Plans for Tabulation and Publication and Project Time Schedule

Not applicable. The NDI is an ongoing service with none of the information collected via the forms being intended for statistical use. The forms are used for administrative purposes in operating the program.

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

The OMB expiration date will be displayed.

18. Exceptions to Certification for Paperwork Reduction Act Submission

The certifications are included in this submission.