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Social Security and the Death Master File

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Social Security and the Death Master File

Executive summary

The Death Master File (DMF), a file extracted from the Social Security Administration's (SSA) database of Social Security number holders, contains the death reports that SSA collects to administer its programs; the DMF has been a lightning rod for criticism for nearly a decade.¹ SSA uses the death data it receives to determine eligibility for and termination of benefit payments. However, errors in the death-reporting process cause severe disruptions to the financial lives of those who are mistakenly reported as dead.

SSA shares the death data it collects with federal partners consistent with statutory requirements that are designed to improve program integrity and administration across the government. It also shares these data with the public following settlement in 1980 of a lawsuit against the agency.² By spending significant amounts of its limited administrative budget to make its data collection more efficient and accurate, SSA has sought to protect the public from the adverse outcomes of reporting errors. Unfortunately it has been unable to guarantee accuracy in the deaths that it records, in part because of limitations on activities outside its mission of payment of benefits.³

Federal benefit-paying agencies, banks, identity authentication companies, and others rely on the death data SSA provides through the DMF, even though the agency obtains proof for only some of the death reports that it receives.⁴ Users of the DMF must sign an agreement with the National Technical Information Service (NTIS) that outlines SSA requirements designed to reduce the likelihood that erroneous death reports cause harm to living people,⁵ but not all signatories adhere to the rules. Occasionally, an erroneous death report wherein a living person is mistakenly reported to SSA as dead is entered into the DMF. The consequences for that person can be severe, including bank account closure, denial of credit or employment, and other actions causing significant economic hardships.

SSA pays state vital records agencies millions of dollars each year to obtain their automated death data.⁶ State-generated death data are generally viewed as more accurate⁷ and efficient for SSA to process and record than death reports from federal agencies and other sources. But SSA interprets Section 205(r) of the Social Security Act as barring it from sharing the costs it pays for state data (paid for from the trust funds) with other

1 Joint Hearing before House Committee on Financial Services, Subcommittee on Oversight and Investigations and Committee on Ways and Means, Subcommittee on Oversight, *Preventing Identity Theft by Terrorists and Criminals* (prepared statement of the Honorable Sue W. Kelly, Chair, Subcommittee on Oversight and Investigations), Serial No. 107-50, 107th Congress, November 8, 2001, <<https://www.gpo.gov/fdsys/pkg/CHRG-107hhrg76259/html/CHRG-107hhrg76259.htm>>.

2 Hearing before House Committee on Ways and Means, Subcommittee on Social Security, *Social Security's Death Records* (answer to question posed from Sam Johnson, Chair, Subcommittee on Social Security to Michael Astrue, Commissioner, Social Security Administration), Serial No. 112-SS13, 112th Congress, February 2, 2012, p. 10 <<https://www.govinfo.gov/content/pkg/CHRG-112hhrg78179/html/CHRG-112hhrg78179.htm>>.

3 Conference call with the Office of the Commissioner, October 25, 2017, meeting notes on file with the Social Security Advisory Board.

4 Social Security Administration, Program Operations Manual System, GN 02605.050.E. *Reports of Death for Non-Beneficiaries*, October 30, 2017 <<http://policy.ssa.gov/poms.nsf/lnx/020.260.2050>>.

5 Department of Commerce, National Technical Information Service, *Limited Access Death Master File Non-Federal Subscriber Agreement Attachment B*, March 25, 2014 <<https://classic.ntis.gov/assets/pdf/dmf-subscribeagmt.pdf>>.

6 Email from Office of Retirement and Disability Policy, Social Security Administration, November 20, 2017. Email on file with the Social Security Advisory Board.

7 Social Security Administration, Office of the Inspector General, *State Use of Electronic Death Registration Reporting*, A-09-15-50023, July 2017, p. A-1 <<https://oig.ssa.gov/sites/default/files/audit/full/pdf/A-09-15-50023.pdf>>.

federal partners,⁸ and the same law prohibits SSA from sharing state data with the private sector and most non-benefit-paying federal agencies.⁹

Given the significant demands placed on SSA to administer its programs and the agency’s limited resources, as well as the limitations on its ability to share death data more broadly, SSA should not be responsible for collecting and disseminating death data to the entire federal government when there is another, better option.

The U.S. Department of the Treasury (Treasury) operates an online portal dedicated to preventing and detecting improper federal payments and is designed to provide such data—in real time—across the federal government.¹⁰ Congress created Treasury’s Do Not Pay (DNP) portal as a consolidated program-integrity tool to ensure the accuracy of all types of federal payments—not just federal benefit payments. Congress should shift responsibility for collection and dissemination of death data from SSA to Treasury’s DNP portal. It is appropriate to use general revenues, including those expended by DNP to fund the purchase of death data, because the data are useful across the government. In contrast, it is inappropriate to use revenues dedicated to paying Social Security cash benefits and covering the administrative costs of paying such benefits to fund an activity of general utility across the federal government.¹¹

■ Key abbreviations

CMS.....	Centers for Medicare and Medicaid Services
DMF	Death Master File
DNP	Do Not Pay
EDR.....	Electronic Death Registration
EVVE	Electronic Verification of Vital Events
FOIA	Freedom of Information Act
HHS	Department of Health and Human Services
NAPHSIS.....	National Association for Public Health Statistics and Information Systems
NUMIDENT.....	Numerical Index File
NTIS	National Technical Information Service
OIG.....	Office of the Inspector General
PII	Personally Identifiable Information
SSA.....	Social Security Administration
Treasury	Department of the Treasury

8 The Social Security Administration interprets “...the reasonable cost of carrying out such arrangement...” to mean that it is only allowed to seek reimbursement of the costs it incurs to create the extracted file for an agency, not for the cost of purchasing the data that makes up the file. The Social Security Act §205(r)(3)(A) <https://www.ssa.gov/OP_Home/ssact/title02/0205.htm>; 42 U.S.C. 4b05(r)(3)(A) <<https://www.law.cornell.edu/uscode/text/42/405>>.

9 The Social Security Act §205(r)(3)(A) <https://www.ssa.gov/OP_Home/ssact/title02/0205.htm>; 42 U.S.C. 405(r)(3)(A) <<https://www.law.cornell.edu/uscode/text/42/405>>.

10 Department of Treasury, Bureau of the Fiscal Service, Do Not Pay Fact Sheet, August 7, 2018, p. 1, <<https://fiscal.treasury.gov/files/dnp/DoNotPayFactSheet.pdf>>.

11 William R. Morton, “The Social Security Disability Insurance (DI) Trust Fund: Background and Current Status,” Library of Congress, Congressional Research Service, R43318, January 19, 2016, p. 3 <[https://greenbook-waysandmeans.house.gov/sites/greenbook.waysandmeans.house.gov/files/R43318%20-%20The%20Social%20Security%20Disability%20Insurance%20\(DI\)%20Trust%20Fund%20-%20Background%20and%20Current%20Status_1.pdf](https://greenbook-waysandmeans.house.gov/sites/greenbook.waysandmeans.house.gov/files/R43318%20-%20The%20Social%20Security%20Disability%20Insurance%20(DI)%20Trust%20Fund%20-%20Background%20and%20Current%20Status_1.pdf)>.

1. Social Security Administration death data collection

A. Purpose

The Social Security Administration (SSA) collects—and should only collect—death data for one purpose: to ensure proper administration of its benefit programs.¹² Generally, agency policy is to post a date of death when the report is received into the NUMIDENT, a system of records housing basic identifying information on everyone that holds a Social Security number.¹³ Payments are then terminated if that number holder is a Social Security beneficiary or a recipient of Supplemental Security Income. In most instances, this is true even if proof of death, such as a state-issued death certificate or its electronic equivalent is not received.¹⁴ To pay survivor benefits, the report must be proven in every case with a death certificate or similar documentation. In all other cases, SSA does not obtain proof of death because doing so is correctly viewed as extraneous to SSA’s mission.¹⁵

B. Sources of death data

For many years, SSA relied predominantly on death reports from family members, hospitals,

funeral homes, and others.¹⁶ State vital records agencies transmitted paper death certificates to SSA as well. Today, participating state agencies can share death reports through the electronic death registration (EDR) system. Non-EDR death reports still come to the agency and are recorded by SSA employees. If an EDR report is submitted after another form of death report, the EDR version overwrites the first report received.¹⁷

C. SSA’s death recording and verification processes

EDR reports are considered to be the most accurate by SSA and others because the system compares the deceased individual’s name and SSN against the NUMIDENT before posting the death.¹⁸ Thus, EDR reports are considered proven in the same way that receipt of a paper death certificate would constitute a proof of death.¹⁹

SSA has created two categories of death reports in its policy, so-called “first-party” and “third-party” reports²⁰ (see *Figure 1*). SSA only secures proof of death in order to pay survivors’ benefits or, in

12 Hearing before House Committee on Ways and Means, Subcommittee on Social Security, Social Security’s Death Records (hearing advisory), Serial No. 112-SS13, 112th Congress, February 2, 2012, p. 10 <<https://www.govinfo.gov/content/pkg/CHRG-112hhrg78179/html/CHRG-112hhrg78179.htm>>.

13 A death report submitted by a third party, such as a friend or neighbor, requires that the reporter provide accurate identifying information for him/herself and the decedent before it is accepted; the report must then be verified for a beneficiary/recipient to pay survivor benefits.

14 If a death is reported by a less reliable “third-party” source, benefits are terminated only after proof of the death is obtained by the Social Security Administration.

15 Social Security Administration, Program Operations Manual System, GN 02605.050.E. Reports of Death for Non-Beneficiaries, October 30, 2017 <<http://policy.ssa.gov/poms.nsf/lnx/020.260.2050>>.

16 Hearing before Senate Committee on Homeland Security and Governmental Affairs, Examining Federal Improper Payments and Errors in the Death Master File (statement of Sean Brune, Senior Advisor to the Deputy Commissioner, Office of Budget, Finance, Quality and Management, Social Security Administration), Serial No. 114-419, 114th Congress, March 16, 2015, pp. 11-12 <<https://www.gpo.gov/fdsys/pkg/CHRG-114shrg94278/html/CHRG-114shrg94278.htm>>.

17 Government Accountability Office, *Social Security Death Data: Additional Action Needed to Address Data Errors and Federal Agency Access*, GAO-14-46, November 2013, fn. 25 <<https://www.gao.gov/assets/660/659289.pdf>>.

18 Social Security Administration, Office of the Inspector General, *State Use of Electronic Death Registration Reporting*, A-09-15-50023, July 2017, p. 3 <<https://oig.ssa.gov/sites/default/files/audit/full/pdf/A-09-15-50023.pdf>>.

19 Social Security Administration, “Information Collection Review, Supporting Statement for the State Death Match Collections State Death Match—Electronic Death Registration (EDR) Online Verification of the Social Security Number in State Death Registration State Manual Death Registration process, OMB # 0960-0700,” April 30, 2008, p. 3, <<http://reginfo.gov/public/do/DownloadDocument?objectID=5779201>>.

20 An electronic death registration report, considered to be first-party source, is automatically verified against the NUMIDENT record as part of the submission process.

Figure 1 Types of death reports

First party:

- EDR and non-EDR state data
- Close relative (spouse, parent, sibling)
- Representative payee or agent
- Competent adult entitled on the same Social Security number

Third party (if reporter and decedent information matches SSA records):

- Federal agency, such as the Department of Veterans Affairs
- State agency, such as state welfare office
- Friends or neighbors

Source: POMS GN 02602.050, 2017, <https://secure.ssa.gov/poms.nsf/lnx/0202602050>.

the case of a third-party report, the decedent in question was receiving benefits at death.²¹ Non-state death reports are recorded without proof if no survivor entitlement is present, the report is

from a source considered reliable or if no current benefits are being paid to the decedent.²² This practice is a potential source of trouble when SSA shares death data with entities that, in turn, fail to do their own due diligence.²³ Figure 2 is a flow diagram plotting the source, proof received, and recording steps for each type of death report: EDR, first- and third-party. As item 2A in the diagram shows, an EDR report automatically cross-checks a state death report with SSA records and places matched reports onto the NUMIDENT; non-EDR first- and third-party reports (2B and 2C) are not necessarily proven using a death certificate or similar proof.

D. Errors in SSA death data

The number of erroneous death reports corrected by SSA has generally decreased over time.²⁴ See Figure 3. The principal reasons are increased reliance on EDR, along with systems changes designed to catch errors before a NUMIDENT record is changed.²⁵ Currently, the agency reports correcting approximately one-third of one percent of the approximately 2.9 million death reports received each year. Still, for the 7,000 to 12,000 people erroneously recorded as dead on SSA's NUMIDENT annually, the consequences can be severe: identity authentication may be affected,²⁶ employment may be difficult to secure, credit

21 Social Security Administration, Program Operations Manual System, GN 02602.050.D. *Third-Party Reports of Death*, October 30, 2017 <<http://policy.ssa.gov/poms.nsf/lnx/020.260.2050>>.

22 Social Security Administration, Program Operations Manual System, GN 02605.050.E. *Reports of Death for Non-Beneficiaries*, October 30, 2017 <<http://policy.ssa.gov/poms.nsf/lnx/020.260.2050>>.

23 Hearing before Senate Committee on Homeland Security and Governmental Affairs, *Examining Federal Improper Payments and Errors in the Death Master File* (question posed by Senator Claire McCaskill to Daniel Bertoni, Director, Education, Workforce and Income Security, Government Accountability Office), Serial No. 114-419, 114th Congress, March 16, 2015, p. 30 <<https://www.govinfo.gov/content/pkg/CHRG-114shrg94278/pdf/CHRG-114shrg94278.pdf>>.

24 According to the Office of the Inspector General, the Social Security Administration corrected over 36,000 erroneous death reports between May, 2007 and April, 2010. This, along with the data reported for 2011 in Figure 3 above averaged about 12,000 corrections per year in the period before 2012 as compared to an annual average of less than 8,300 unique corrections per year since. See: Social Security Administration, Office of the Inspector General, *Personally Identifiable Information Made Available to the Public Via the Death Master File (Limited Distribution)*, A-06-10-20173, March 31, 2012 <https://oig.ssa.gov/sites/default/files/audit/full/pdf/A-06-10-20173_7.pdf> and Figure 3 above.

25 Hearing before Senate Committee on Homeland Security and Governmental Affairs, *Examining Federal Improper Payments and Errors in the Death Master File* (statement of Sean Brune, Senior Advisor to the Deputy Commissioner, Office of Budget, Finance, Quality and Management, Social Security Administration), Serial No. 114-419, 114th Congress, March 16, 2015, pp. 11-12 <<https://www.gpo.gov/fdsys/pkg/CHRG-114shrg94278/html/CHRG-114shrg94278.htm>>.

26 William L. Kovaks, Senior Vice President, Environment, Technology and Regulatory Affairs, Chamber of Commerce of the United States to John Hounsell, National Technical Information Service, "Certification Program for Access to the Death Master File, Docket. No. 140205103-4103-01," March 18, 2014, p. 3. <<https://www.uschamber.com/sites/default/files/documents/files/3.18.14-%20Comment%20Letter%20on%20Certification%20Program%20for%20Access%20to%20the%20Death%20Master%20File.pdf>>.

Figure 2 The effect on benefits and the claims process

2A Electronic death registration

An EDR report is entered manually at a funeral home, a medical examiner's office, etc.

The EDR report is then compared to the corresponding SSA NUMIDENT record.

Do the data match?

Yes. The death report is processed at the state level and forwarded to the NUMIDENT.

No. An error message is sent to the reporter and the report must be resubmitted with accurate information.

The death report is posted to SSA's NUMIDENT and is considered proof of death.

2B First-party (non-EDR)

A valid state-issued certificate is provided to SSA.

If the information provided matches the NUMIDENT record, the death is posted by an SSA employee to the NUMIDENT.

A spouse or other close relative notifies SSA about a death.

If the information provided matches the NUMIDENT record, the death is posted by an SSA employee, with or without proof, such as a death certificate.

2C Third-party

A federal or state agency reports a death to SSA.

If the deceased person is not a beneficiary and the identifying data match the NUMIDENT record, the death is posted by an SSA employee without proof and is considered unproven. Proof of death is obtained in order to post a beneficiary's death.

A friend or neighbor reports a death to SSA. The reporter's information matches NUMIDENT record.

The effect on benefits and the claims process

- If the deceased person was a beneficiary of SSA programs at time of death, those benefits are terminated immediately after the death is posted to the NUMIDENT.
- Proof of death must exist in SSA records before a survivor's claim is allowed, regardless of the source of the death report.

Figure 3

Year	Corrected Death Reports
2011	11,800
2012	8,900
2013	9,100
2014	7,700
2015	7,300
2016	10,431
2017	8,217

Source: SSA Death Information Processing System Data, 2016 and 2017. Note: The 10,431 erroneous death reports corrected by SSA in 2016 reflect 2,113 non-recurring anomalous errors; one vital records jurisdiction repeatedly transmitted the same erroneous death reports that had to be corrected (254) and some states sent unreliable death reports as part of a pilot project designed to collect very old death data (1,859). Social Security Administration Office of Retirement and Disability Policy RDP, email to board staff, sent June 16, 2017.

may be denied, tax refunds may be delayed and other adverse actions may be taken by entities that receive SSA's death data.²⁷ SSA can fix an erroneous death report in its system rather quickly once it is discovered (usually when a number holder erroneously listed as dead visits an SSA field office).²⁸

The board requested from SSA information to clarify how a living person could be recorded as deceased and was told that the precise reasons for such errors remain unknown.²⁹ Two examples of sources for erroneous death reports are:

- mistakes made by other federal agencies that are then shared with SSA (see Figure 4); or
- keying errors made during manual input before a report or death certificate is transmitted to SSA or in some cases, when an SSA employee manually inputs a death report on SSA's side.³⁰

SSA efforts to improve its death data processing have focused on ensuring that: (a) all death reports are recorded on the NUMIDENT (as opposed to other SSA systems that do not necessarily communicate with one another)³¹; and (b) systems improvements prevent as many keying errors as possible.³² These efforts were stepped up as criticisms triggered by errors in the DMF mounted.³³

The best way to minimize mistakes, according to SSA, its Office of the Inspector General (OIG), and state advocates is by using EDR for recording deaths. Its automated process, instant verification that the right person is being recorded and speed of recording make it a preferred alternative to other slower and more error-prone reporting options that: (a) may require multiple keyed entries of data; and (b) are not matched to the NUMIDENT first.³⁴ It should be emphasized that using EDR will not eliminate all errors, but will limit them, as Figure 5 makes clear.

27 Thomas Hargrove, "America's Undead: Social Security Clerically Kills Thousands of Americans Each Year," *Grave Mistakes: An Obscure Database Causes Mischief and Misery*, Scripps Howard News Service, May 23, 2011, pp. 4-7 <<https://www.scribd.com/document/117144379/GraveMistakes-ID-Mag>>.

28 Tom Berger, "Making Sense of the GAO Reports on Gaps & Errors in the SSA Death Master File," *The Cross Country Computer Blog*, May 21, 2013 <<https://www.crosscountrycomputer.com/blog/making-sense-of-the-gao-reports-on-gaps-errors-in-the-ssa-death-master-file/>>.

29 Conference call with the Office of the Commissioner, October 25, 2017, meeting notes on file with the Social Security Advisory Board.

30 Conference call with the Office of the Commissioner, October 25, 2017, meeting notes on file with the Social Security Advisory Board.

31 Social Security Administration staff are required to place all dates of death onto the NUMIDENT because only that system populates all other agency systems and only that system is extracted to create versions of the DMF. A date of death placed into the Master Beneficiary Record, for example, will not migrate to the NUMIDENT and will not appear on any version of the DMF. See: Social Security Administration, Program Operations Manual System GN 02602.051, *Processing Reports of Death Using the Death Information Processing System*, October 5, 2017, <<https://secure.ssa.gov/poms.nsf/lnx/020.260.2051>>; and Social Security Administration, Office of the Inspector General, *NUMIDENT Death Information Not Included on the Death Master File*, A-06-16-50069, September 2016, p. 2 <<https://oig.ssa.gov/sites/default/files/audit/full/pdf/A-06-16-50069.pdf>>.

32 Email from Office of Retirement and Disability Policy, Social Security Administration, September 29, 2016. Email on file with the SSAB.

33 Peter Copeland, "About the Grave Mistakes Special Report," *Grave Mistakes: An Obscure Database Causes Mischief and Misery*, Scripps Howard News Service, 2011, p. 2 <<https://www.scribd.com/document/117144379/GraveMistakes-ID-Mag>>.

34 Westat, *Electronic Death Reporting System Online Reference Manual: A Resource Guide for Jurisdictions*, Version 1, December 2016, pp. 9-10 <<https://www.cdc.gov/nchs/data/dvs/EDR-online-reference-manual.pdf>>.

Figure 4

How does a living person end up recorded as dead? —A hypothetical example

How is it possible to record a living person as dead if SSA’s system requires that all the identifying information is identical between a NUMIDENT record and a death report? Let’s look at the example of “Mary.”

Mary is a Medicare recipient who was recently hospitalized due to illness. In processing the hospital paperwork from Mary’s stay, an employee of the Centers for Medicare and Medicaid Services (CMS) misreads the entry for Date of Discharge from the hospital as Date of Death and records the erroneous death of Mary on the CMS system of records.

As part of a data-sharing agreement with SSA, that erroneous death report is provided to the agency without proof and is posted to the NUMIDENT. Mary’s Social Security benefits are suspended and she would need to visit her local field office to have the error corrected. She would be given a letter from SSA to share with banks and other entities that states she is alive and has been mistakenly recorded on the DMF.

Source: National Council of Social Security Management Associations, interview with board staff, January 14, 2019.

Figure 5

The EDR process

1. State agents, such as funeral directors and medical examiners, enter a death report into the state’s EDR system. This is the only time that data are manually entered, limiting the opportunity for keying or other human errors.
2. The system then automatically compares the information to that in SSA’s enumeration database, the NUMIDENT. If any of the identifying data fail to match a single NUMIDENT record, the report is rejected and EDR notifies the agent that the report must be re-submitted with accurate information.
3. If the data in the report match those in the NUMIDENT, the death certificate is filed with the local registrar.
4. From the local registrar, the verified electronic death certificate is filed with the state which then automatically enters it onto SSA’s NUMIDENT, eliminating the need for an SSA employee to take any action. It is this automated data entry that makes the system more efficient from the agency’s perspective.

Source: OIG, SSA, 2017, p. 3, <https://oig.ssa.gov/sites/default/files/audit/full/pdf/A-09-15-50023.pdf>.

2. State data

State vital records agencies are responsible for collecting and storing the vital statistics of those born, residing in, and/or dying in their jurisdictions.³⁵ This function, while supported with some federal resources, is held as a state responsibility. Tools created by these agencies could eventually replace the federal government's distribution of any death data to the private sector.

A. Ownership of state vital records

States have long held (and Congress concurs) that states own the vital records of people who die within their boundaries.³⁶ The sale of those records is a source of revenue for states.³⁷

The state data are crucial to the federal government's program integrity efforts. For example, in 1983, the House Ways and Means Committee noted that SSA's use of state death records could "prevent erroneous benefit payments to deceased individuals [in Social Security programs]."³⁸ Congress subsequently added subsection (r) to Section 205 of the Social Security Act, which specifies how SSA should collect *and distribute* state death records. Specifically, the section:

- requires SSA to enter into cooperative agreements to share state data with federal benefit-paying agencies

- requires SSA to enter into a contractual arrangement with willing states to receive state death data and requires SSA to compare those data with its benefit/recipient data to accurately reflect the status of individuals
- allows states to be paid for reasonable costs (as agreed to by SSA and the states)
- allows SSA to be reimbursed for costs associated with sharing the state data (although SSA interprets this provision to exclude reimbursement for costs it expends to purchase the data in the first place)
- excludes state death data from release to the public.³⁹

B. State tools for data sharing

State vital records agencies across the country have pooled their resources to establish the nonprofit National Association for Public Health Statistics and Information Systems (NAPHSIS).⁴⁰ NAPHSIS, in turn, has built automated tools to provide vital records data to customers. EDR is one such tool used by SSA.⁴¹ Another is the Electronic Verification of Vital Events (EVVE) system, which is available to both public and private sector customers.⁴²

35 National Association for Public Health Statistics and Information Systems, *2017 Annual Report and Special Report on the Nation's Death Data*, 2017, p. 7 <https://docs.wixstatic.com/ugd/b08966_63910f5cf5d94ab9a8f28b7c39cb7db8.pdf>.

36 National Center for Health Statistics, "Appendix B, The U.S. Vital Statistics System: A National Perspective," in *Vital Statistics: Summary of a Workshop*, ed. Michael J. Siri and Daniel L. Cork, National Academies Press, 2009, pp. 87–109 <<https://www.ncbi.nlm.nih.gov/books/NBK219884/>>.

37 Steven Schwartz, "Appendix A, The U.S. Vital Statistics System: The Role of State and Local Health Departments," in *Vital Statistics: Summary of a Workshop*, ed. Michael J. Siri and Daniel L. Cork, National Academies Press, 2009, pp. 77–85 <<https://www.ncbi.nlm.nih.gov/books/NBK219884/>>.

38 House Committee on Ways and Means, *House Report 98–25 accompanying H.R. 1900, the Social Security Act Amendments of 1983*, March 4, 1983, p. 83 <<https://www.ssa.gov/history/pdf/Downey%20PDFs/Social%20Security%20Amendments%20of%201983%20Vol%201.pdf>>.

39 The Social Security Act §205(r) <https://www.ssa.gov/OP_Home/ssact/title02/0205.htm>; 42 U.S.C. 405(r), <<https://www.law.cornell.edu/uscode/text/42/405>>.

40 James A. Weed, "The United States Vital Statistics System: A National Perspective" (prepared for Workshop on Vital Data for National Needs), *Committee on National Statistics, The National Academies*, April 30, 2008, pp. 2–3, <<http://unstats.un.org/unsd/vitalstatkb/Attachment312.aspx?AttachmentType=1>>.

41 National Association for Public Health Statistics and Information Systems, "About NAPHSIS" (webpage), <<https://www.naphsis.org/about-naphsis>>.

42 National Association for Public Health Statistics and Information Systems, "About EVVE" (webpage), <<https://www.naphsis.org/evve>>.

of death in 39 states, the District of Columbia, and Puerto Rico; fact-of-death verification is currently being installed in the remaining jurisdictions. EVVE is one example of an alternative to SSA's DMF. However, unlike with the public DMF, EVVE purchasers must match their customer records to state data, rather than receiving a batch data file from the states. NAPHSIS has no plans to allow for file releases at this time.⁴⁶ Cost may also be a limiting factor for some data users.⁴⁷

iii. Cost of state data borne by SSA

SSA negotiates with NAPHSIS the per-record EDR cost. *Figure 7* provides the total cost to the agency per calendar year from 2009 through 2016.⁴⁸

Because SSA uses state death data in its administration of Social Security benefit programs, the Social Security trust funds finance the data purchases. Other federal benefit-paying agencies need and use the data for their own program integrity. Other federal agencies reimburse SSA only for the costs to create the full DMF,⁴⁹ which, in 2017, amounted to approximately 1.65 percent of the

agency's total costs to purchase state data and create the file. Meanwhile, NAPHSIS has raised the per-record cost of purchasing the most timely EDR death records (those received within six business days) by 25 percent over seven years, from \$2.79 per record in 2011 to \$3.49 in 2018.⁵⁰

Between 2001 and 2006, SSA also provided funding that helped 16 states and jurisdictions establish an automated EDR portal for sharing death information with SSA.⁵¹ In 2006, authority to administer expansion of EDR was delegated to the Department of Health and Human Services (HHS) under the Intelligence Reform and Terrorism Prevention Act of 2004, Section 7211(c)(2), which called for the computerization of all birth and death records through grants awarded by HHS.⁵² Inclusion of EDR in that statute was an effort to prevent potential terrorists and other criminals from engaging in identity theft. Currently 46 states, the City of New York, and the District of Columbia participate, at least partially, in EDR; full participation and utilization of the system mean that SSA's death records from those locations include the most reliable information.⁵³

46 Email from Electronic Verification of Vital Events team, National Association for Public Health Statistics and Information Systems, January 4, 2018. Email on file with the Social Security Advisory Board.

47 According to a price list of Electronic Verification of Vital Events Fact of Death subscriptions, a monthly subscription for 1,000,001 to 5,000,000 queries for private sector purchase costs \$12,500 with discounts offered to federal, state and local purchasers. See: National Association for Public Health Statistics and Information Systems, "Electronic Verification of Vital Events Fact of Death Pricing Structure," fact sheet, February, 2017. Fact sheet on file with the Social Security Advisory Board.

48 Email from Office of Retirement and Disability Policy, Social Security Administration, November 20, 2017. Email on file with the Social Security Advisory Board.

49 This cost includes extraction of decedent records and corrected erroneous reports, creation of the files, and transmittal to agencies and to the National Technical Information Service.

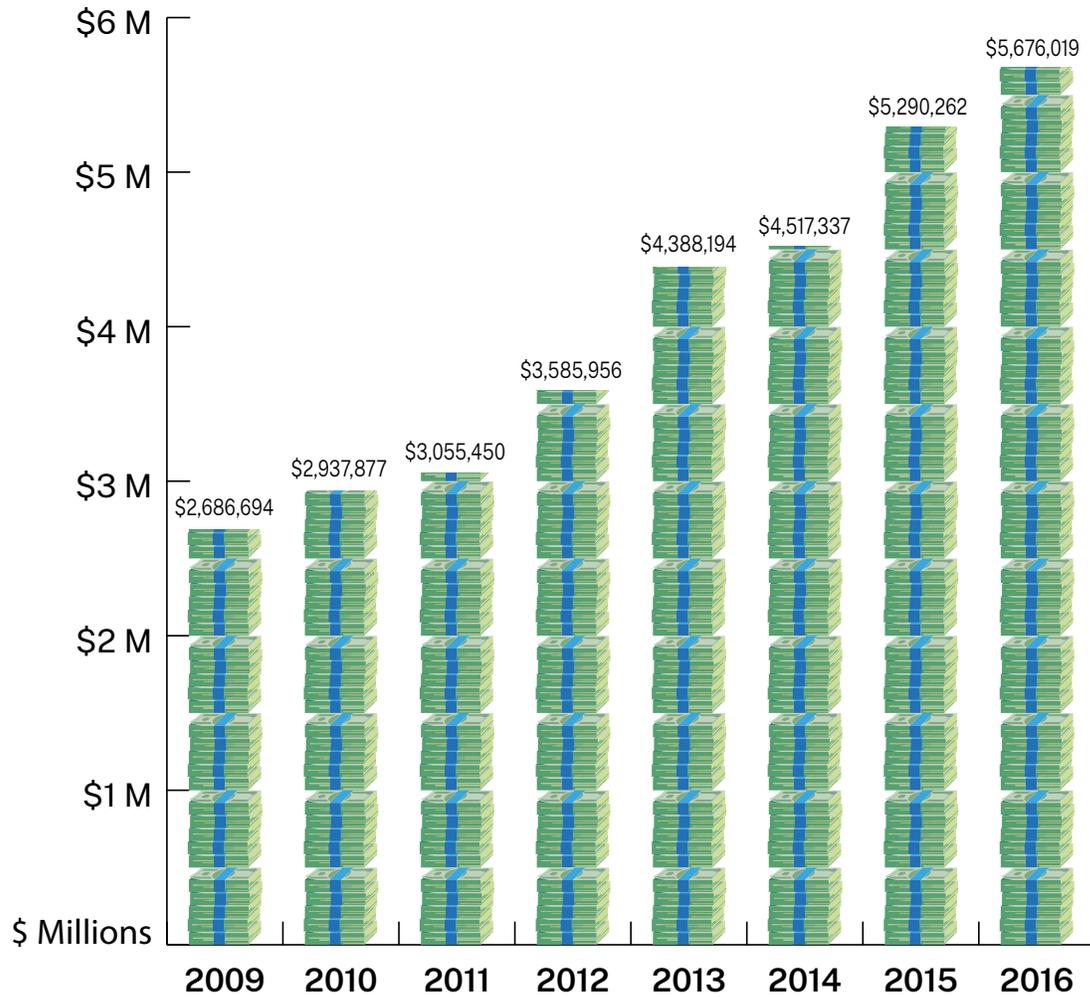
50 This figure was arrived at by comparing the reimbursement amounts received by the Social Security Administration from other federal agencies to the annual costs paid by them to the National Association for Public Health Statistics and Information Systems for the purchase of state records. Email from Office of Retirement and Disability Policy, Social Security Administration, November 20, 2017. Email on file with the Social Security Advisory Board.

51 Social Security Administration, *FY 2007 Performance and Accountability Report*, November 7, 2007, p. 25 <https://www.ssa.gov/finance/2007/Agency_Challenges.pdf>.

52 The Intelligence Reform and Terrorism Prevention Act of 2004 (Public Law 108–458); §7211(c)(2); Code <<https://www.gpo.gov/fdsys/pkg/PLAW-108publ458/html/PLAW-108publ458.htm>>.

53 National Association for Public Health Statistics and Information Systems, "Information Systems for Vital Records Stewardship" (webpage), <<https://www.naphsis.org/systems>>.

Figure 7: Total trust fund payments for state death records, 2009–2016



Source: SSA Office of Retirement and Disability Policy, internal cost data emailed to SSAB staff, November 20, 2017

HHS is working to bring non-participating states online and to complete development in other states.⁵⁴ In addition, there are monetary incentives for states to participate in EDR because SSA pays a higher per-record rate for EDR reports as

compared to non-EDR reports.⁵⁵ However, EDR is not fully implemented and utilized in all vital records jurisdictions. Also, according to NAPHSIS, states that implemented EDR early are now in need of system upgrades.⁵⁶

54 Department of Health and Human Services, Centers for Disease Control and Prevention, National Center for Health Statistics, “National Vital Statistics System Improvements” (webpage), <https://www.cdc.gov/nchs/data/factsheets/factsheet_nvss_improvements.htm>.

55 Government Accountability Office, *Social Security Death Data: Additional Action Needed to Address Data Errors and Federal Agency Access*, GAO-14-46, November 2013, p. 7 <<https://www.gao.gov/assets/660/659289.pdf>>.

56 Shawna Webster, Executive Director, NAPHSIS, to Chairman Tom Cole and Ranking Member Rosa DeLauro, House Committee on Appropriations Subcommittee on Labor, Health and Human Services and Selected Agencies, “Request for funding for the National Center for Health Statistics,” March 26, 2018, copy on file with the Social Security Advisory Board.

3. SSA's distribution of death data

SSA collects death data for its own business purposes; however, other federal agencies also rely on the death data SSA maintains in its records as part of their program integrity efforts. The private sector also relies on the publically available, non-state SSA death data available for purchase via the National Technical Information Service (NTIS).

A. Federal agencies' use of state data

SSA is authorized to share state information only with specified federal agencies.⁵⁷ Agencies that have data-sharing agreements with SSA to receive state-sourced death data include the Railroad Retirement Board, Pension Benefit Guaranty Corporation, U.S. Departments of Defense, Veterans Affairs, Agriculture, Housing and Urban Development, Office of Personnel Management, Federal Thrift Investment Board, the Centers for Medicare and Medicaid Services and Internal Revenue Service.⁵⁸

Federal benefit-paying agencies in receipt of the state death data are required to *verify independently* the fact of death before acting on the information.⁵⁹ The requirement for independent verification is stated within agencies' data-sharing agreements with SSA.

B. History of death data releases

A living person who is erroneously reported as dead can suffer consequences when a federal agency

takes an action in error.⁶⁰ Release of erroneous death reports into the public sphere can pose an even greater threat to economic lives of Americans. SSA says that it is required to share non-state data with the public because of a nearly 40-year-old lawsuit, filed by the U.S. Postal Service's General Manager of Accounting, Ronald Perholtz, against SSA—hereafter referred to as *Perholtz*.⁶¹

i. The Perholtz case

Mr. Perholtz realized that the Postal Service was issuing pension checks to some deceased retirees. He also realized that SSA collected information about reported deaths and these data could be used to prevent such errors, thereby saving the Postal Service millions of dollars. SSA initially would not release the information. Perholtz filed suit contending that the Privacy Act was not applicable because deceased people have no privacy rights. Consequently, he claimed that SSA could share the data under FOIA. The Department of Justice, as SSA's counsel, entered into an agreement with Perholtz and the court issued a consent decree authorizing release of the information. SSA then began providing access to death records to others upon request and finally created what is commonly referred to as the DMF.⁶²

ii. The full and public death master files

After *Perholtz*, the DMF became SSA's tool to provide FOIA-able death data to multiple users. As stated earlier, the federal government is prohibited from

57 The Social Security Act §205(r)(3) <https://www.ssa.gov/OP_Home/ssact/title02/0205.htm>; 42 U.S.C. 405(r)(3), <<https://www.law.cornell.edu/uscode/text/42/405>>.

58 Government Accountability Office, *Social Security Death Data: Additional Action Needed to Address Data Errors and Federal Agency Access*, GAO-14-46, November 2013, pp. 23–24 <<https://www.gao.gov/assets/660/659289.pdf>>.

59 Joint Hearing before House Committee on Financial Services, Subcommittee on Oversight and Investigations and Committee on Ways and Means, Subcommittee on Oversight, *Preventing Identity Theft by Terrorists and Criminals* (prepared statement of Fritz Streckewald, Acting Assistant Deputy Commissioner for Disability and Income Security Programs, Social Security Administration), Serial No. 107–50, 107th Congress, November 8, 2001, pp. 73–83 <<https://archives-financialservices.house.gov/media/pdf/107-50.pdf>>.

60 For example, if a benefit-paying agency terminates benefits before independently verifying a fact of death.

61 *Perholtz v. Ross*, Civ. No. 78–2385 and 78–2386 (D.D.C. 1980).

62 Joint Hearing before House Committee on Ways and Means, Subcommittees on Social Security and Oversight, *Identity Theft and Tax Fraud* (statement by David F. Black, General Counsel, Social Security Administration), Serial No. 112–OS12/SS15, 112th Congress, May 8, 2012, pp. 70–74 <<https://www.govinfo.gov/content/pkg/CHRG-112hrg78817/pdf/CHRG-112hrg78817.pdf>>.

making state-owned vital records data publicly available. This prohibition has resulted in SSA creating two versions of the DMF. Both versions include a portion of death reports for which SSA has not obtained proof of death through EDR or a valid death certificate. Those deaths are noted in the DMF via a special code.⁶³

a. The full file

The first version of the file, the full DMF, includes all death data that SSA receives, including state-owned data. As of September 2018, this file contained 121 million death records.⁶⁴ Federal agencies receive either weekly or monthly updates and corrections to the full DMF, based on the timetable they request.

b. The public file

The public DMF does not include death data received from states, but includes all other reports of death, both for which proof was obtained by SSA and those with no proof.⁶⁵ *As state data expand as a share of SSA's death data, the public file will include progressively fewer new death reports and become less useful as an anti-fraud or identity authentication tool or for the tracking of research subjects.* SSA provides the public DMF to the U.S. Department of Commerce's NTIS, which in turn offers it for

purchase to the general public.⁶⁶ NTIS offers a limited access file, which includes all non-state death information, regardless of when the death occurred, and is available only to purchasers who can certify their ability to protect the data. The limited access file was created by Congress as a means to prevent tax fraud and protect the PII of living people.⁶⁷ However, it is important to note that older versions of the DMF still exist and may contain outdated and incorrect information.

SSA sends the public DMF to the NTIS on a weekly, monthly, and quarterly basis, with correction files released weekly. NTIS reimburses SSA for its cost to produce the file and sells it to entities such as financial institutions, insurance companies and genealogy companies.⁶⁸ Medical researchers and hospitals purchase the public DMF from NTIS to track former patients and research subjects.⁶⁹

Private sector companies use the DMF for identity verification/authentication, fraud prevention, and other important purposes. Still, the limitations of the public DMF can lead to serious adverse actions taken incorrectly against individuals. To prevent reliance on the DMF as a sole means of death verification, the NTIS includes with the public file and on its website the following disclaimer written by SSA:

63 National Technical Information Service (NTIS), "Limited Access Death Master File Extract Output Record Specifications" fact sheet, November, 2011, <<https://dmf.ntis.gov/recordlayout.pdf>>.

64 In contrast, as of September 2016, the public Death Master File housed only 90 million non-state records. As electronic death registration expands, the public file will include fewer and fewer new records.

65 Personally identifiable information, such as date of birth and Social Security number are included in all versions of the Death Master File.

66 The fee schedule set by the National Technical Information Service is allowable under 5 U.S.C. § 552(a)(4), which allows agencies to recoup some of the costs pertaining to a Freedom of Information Act request through fees paid by the requester. See: Department of Justice, *Full Text of the FOIA Improvement Act of 2016 (Public Law No. 114-185)* (webpage), <<https://www.justice.gov/oip/freedom-information-act-5-usc-552>>.

67 A December 2013 continuing appropriations resolution restricted access to the public Death Master File by preventing the Secretary of Commerce from disclosing any information contained in the publicly available file (i.e., the non-state death data) for 3 years after the death of an individual to any person, unless that person is certified to receive the information. See: Bipartisan Budget Act of 2013 (Public Law 113-67); <<https://www.congress.gov/113/plaws/publ67/PLAW-113publ67.pdf>>.

68 Since other entities began to request the Social Security Administration's death data under the Freedom of Information Act, the Death Master File was created in 1980 to ease the administrative burden on the agency and in 1992 the Social Security Administration arranged to have the National Technical Information Service distribute it.

69 Medical researchers seek access to the public Death Master File in order to track the mortality of patients who have undergone high-risk surgeries or been treated with experimental therapies and treatments. However, a recent study published in the *Journal of the American Medical Association* found the DMF unreliable as a tool to study mortality in medical research subjects. See: Kevin Sack, "Researchers Wring Hands as U.S. Clamps Down on Death Record Access," *The New York Times*, October 8, 2012 <<https://www.nytimes.com/2012/10/09/us/social-security-death-record-limits-hinder-researchers.html>>. and Navar AM, Peterson ED, Steen DL, et al. Evaluation of Mortality Data From the Social Security Administration Death Master File for Clinical Research. *Journal of the American Medical Association Cardiol.* 2019;4(4):375-379. doi:10.1001/jamacardio.2019.0198, <https://jamanetwork.com/journals/jamacardiology/article-abstract/2725730?utm_source=twitter&utm_campaign=content-shareicons&utm_content=article_engagement&utm_medium=social&utm_term=030619#.XIB7NuOKv90.twitter>.

“DISCLAIMER: The products advertised on this website contain a Social Security Administration (SSA) database extract. SSA authorizes the use of this database as a death verification tool, but notes that the Death Master File (DMF) may contain inaccuracies. Thus, SSA cannot guarantee the accuracy of the DMF. Therefore, the absence of a particular person on this file is not proof that the individual is alive. Further, in rare instances it is possible for the records of a person who is not deceased to be included erroneously in the DMF.”⁷⁰

Public DMF purchasers are required to purchase subscriptions with regular updates to the DMF to prevent or minimize the impact errors have on the public, although there are no civil or criminal penalties for failing to do so.⁷¹ Because erroneous records could be found and corrected at any time, the practice of using the latest (weekly or monthly) DMF update will minimize the chance of acting on erroneous data and the likelihood of causing harm to living people.

4. An alternative to SSA as death data hub

SSA cannot guarantee a zero error rate in its posting of death reports, in part because errors can occur at stages outside the agency’s control.⁷² The agency does not obtain proof of death for every death report it receives, as that step is outside its mission.⁷³ The agency complies with a court decision arrived at decades before the digital age to make public deaths for which it has not obtained proof and, in a relatively small number of cases, inaccurate death data.⁷⁴ Lastly, the agency interprets the law as precluding it from sharing the costs it pays for state data with other federal partners, even though its costs have more than doubled in eight years.⁷⁵

Given all of these requirements and restrictions, SSA will never be able to ensure—nor should it—that no living person is mistakenly recorded as dead and that the file includes all decedents. Furthermore, SSA spends millions of dollars in dedicated Social Security revenue each year to purchase data used across the federal government. For these reasons, it is time to explore alternatives to SSA as the distributor of death data to federal agencies and the public.

i. Do Not Pay Portal

On January 10, 2013, the Improper Payments Elimination and Recovery Improvement Act of 2012 became law; it requires use of various government

70 Department of Commerce, National Technical Information Service, “Limited Access Death Master File Download” (webpage), <<https://dmf.ntis.gov>>.

71 Department of Commerce, National Technical Information Service, “Mandatory Requirements” (webpage), <<https://dmf.ntis.gov/requirements.html>>.

72 Conference call with Office of the Commissioner, Social Security Administration, October 25, 2017. Meeting notes on file with Social Security Advisory Board.

73 Hearing before Senate Committee on Homeland Security and Governmental Affairs, *Examining Federal Improper Payments and Errors in the Death Master File* (question posed by Senator James Lankford to Sean Brune, Senior Advisor to the Deputy Commissioner, Office of Budget, Finance, Quality and Management, Social Security Administration), Serial No. 114-419, 114th Congress, March 16, 2015, <<https://www.gpo.gov/fdsys/pkg/CHRG-114shrg94278/html/CHRG-114shrg94278.htm>>.

74 Joint Hearing before House Committee on Ways and Means, Subcommittees on Social Security and Oversight, *Identity Theft and Tax Fraud* (statement by David F. Black, General Counsel, Social Security Administration), Serial No. 112-OS12/SS15, 112th Congress, May 8, 2012, pp. 70–74 <<https://www.govinfo.gov/content/pkg/CHRG-112hrg78817/pdf/CHRG-112hrg78817.pdf>>.

75 Email from Office of Retirement and Disability Policy, Social Security Administration, November 20, 2017. Email on file with the Social Security Advisory Board.

databases to verify the eligibility of beneficiaries before benefits are paid and to recover inaccurate payments. It also required the creation of the DNP initiative.⁷⁶

Do Not Pay is a Department of the Treasury (Treasury) consolidated business process for federal agencies. It compares each agency's data regarding benefit payments to several other federal data sources that may indicate ineligibility for those benefits. The portal is designed to place these crucial data sources in one location, making it easier to assure timely, accurate, and proper expenditures.⁷⁷ The DNP portal uses the less comprehensive version of the DMF among other databases because SSA determined that

it does not have the authority to share the full file with DNP.⁷⁸

Treasury's DNP portal is viewed as a "one-stop shop" for federal agencies wishing to prevent improper payments. If the DNP portal were responsible for collecting and disseminating death data across the government, proof of death could be secured for all reports, as there would then be no restrictions on obtaining proof like those exercised by SSA. Also, general funds could be used to purchase state data, thereby assuring that Social Security's dedicated revenues are used for the purpose for which they are collected—paying program benefits and related administrative costs.

5. Findings and recommendations

Years of public scrutiny and expenditure of SSA resources to improve the accuracy of the DMF have reduced but not eliminated the errors that are inherent to it, given SSA's mission and its interpretation of *Perholtz*. The following findings and recommendations represent areas that the Social Security Advisory Board believes deserve corrective action or further study.

Finding: The sole purpose of the Treasury Department's DNP portal is prevention of improper payments. The portal is better suited to secure proof for all death reports on behalf of the entire federal government.

In addition, the private sector's reliance on the public DMF has harmed living people and SSA has begun to rely heavily on state data that, by law, cannot be shared with the public. To date,

this shift has reduced the completeness of the public DMF; eventually, it will become obsolete.

Recommendation 1: Congress should shift responsibility for federal death data collection from SSA to Treasury's DNP portal.

The DNP portal exists to do the program integrity work currently undertaken by SSA. Moving death data collection and dissemination to that portal would reduce duplication and prevent the improper use of Old-Age Survivors and Disability Insurance trust funds for work largely unrelated to SSA's mission. The board assumes that implementation of this change would take some time, during which systems could be built to house the death data at Treasury and to make it available on a timely basis to protect against improper payments by SSA and other federal users. Systems enhancements should also be implemented as early as possible so that

76 House Committee on Oversight and Government Reform, *House Report 112-698 accompanying H.R. 4053, the Improper Payments Elimination and Recovery Improvement Act of 2012*, 112th Congress, November 30, 2012, p. 9 <<https://www.congress.gov/112/crpt/hrpt698/CRPT-112hrpt698.pdf>>.

77 Department of Treasury, Bureau of the Fiscal Service, *Do Not Pay Fact Sheet*, August 7, 2018, p.1, <<https://fiscal.treasury.gov/files/dnp/DoNotPayFactSheet.pdf>>.

78 Government Accountability Office, *Improper Payments: Strategy and Additional Actions Needed to Help Ensure Agencies Use the Do Not Pay Working System as Intended*, GAO-17-15, October 2016, p. 11 <<https://www.gao.gov/assets/690/680464.pdf>>.

death reports received by SSA after the transfer of responsibility can be directly reported to Treasury DNP instead.⁷⁹ This approach recognizes a looming reality that, one day, the public DMF will have no new deaths included and, therefore, diminishing practical utility for most users.

Finding: States own the most accurate available death data. Those data are easily matched to SSA records through EDR. However, EDR is not fully implemented nationwide and states that implemented it early may need upgrades at this point, according to NAPHSIS.⁸⁰ Also, EDR will need to be altered to direct EDR reports to Treasury as part of implementing the board's first recommendation above.

Recommendation 2: The Department of Health and Human Services should fulfill its statutory requirement to support full implementation of EDR.

As EDR reports are assumed to be more accurate than those from any other source, full EDR implementation would solve many death data issues (for new deaths) going forward. For several years, NAPHSIS has estimated that \$5 million in federal funds, spread across EDR and other vital records modernizations, would yield a nationwide electronic system of verified birth and death data.⁸¹ We believe that continued HHS effort is needed to achieve full participation by all states and jurisdictions in EDR and EVVE. Investments to expand and upgrade EDR (as estimated by NAPHSIS) represent only

10 percent of the amount that SSA estimates it saves each *month* through the timely termination of benefits to deceased persons,⁸²

Finding: The full DMF includes state data, considered more accurate than other sources. SSA's interpretation of statute prevents SSA from sharing the full DMF with Treasury's DNP portal.

Recommendation 3: During the transition to DNP as the federal aggregator of death data, Congress should expressly authorize SSA to share the full DMF with Treasury's DNP portal and mandate that SSA be appropriately reimbursed for state data purchase costs.

Until death data are housed at Treasury, the full DMF should be shared with Treasury for use in its DNP portal. Under SSA's current interpretation Section 205(r), SSA cannot share the full file with the DNP portal. Congress should enact time-limited legislation authorizing SSA to grant full file access to DNP. The *Fiscal Year 2018 Budget of the United States* included such a provision minus the time limit proposed by this board.⁸³ Legislation considered in both the 114th and 115th Congress would have granted SSA the authority to share the full file with DNP in an effort to curb improper payments and other types of fraud.⁸⁴ If Congress opts to allow sharing of the full file with the DNP, it should require that other federal users reimburse SSA for a part of the cost of state data purchases.

79 It is important to note that Treasury may be required to release non-state death data under the Freedom of Information Act as well, although it could verify all the death data received, which would be an improvement over the Social Security Administration, as it would be inappropriate to spend Social Security funds for non-Social Security purposes.

80 Shawna Webster, Executive Director, National Association for Public Health Statistics and Information Systems, to Chairman Tom Cole and Ranking Member Rosa DeLauro, House Committee on Appropriations Subcommittee on Labor, Health and Human Services and Selected Agencies, "Request for funding for the National Center for Health Statistics," March 26, 2018. Copy on file at the Social Security Advisory Board.

81 Shawna Webster, Executive Director, National Association for Public Health Statistics and Information Systems, to Chairman Tom Cole and Ranking Member Rosa DeLauro, House Committee on Appropriations Subcommittee on Labor, Health and Human Services and Selected Agencies, "Request for funding for the National Center for Health Statistics," March 26, 2018. Copy on file at the Social Security Advisory Board.

82 Hearing before Senate Committee on Homeland Security and Governmental Affairs, *Examining Federal Improper Payments and Errors in the Death Master File* (statement of Sean Brune, Senior Advisor to the Deputy Commissioner, Office of Budget, Finance, Quality and Management, Social Security Administration), Serial No. 114-419, 114th Congress, March 16, 2015, pp. 11-12 <<https://www.gpo.gov/fdsys/pkg/CHRG-114shrg94278/html/CHRG-114shrg94278.htm>>.

83 Executive Office of the President, Office of Management and Budget, *Appendix, Budget of the United States, Fiscal Year 2018*, May 23, 2017, p. 1113 <<https://www.govinfo.gov/content/pkg/BUDGET-2018-APP/pdf/BUDGET-2018-APP.pdf>>.

84 A companion, H.R. 4929, was introduced in the House by Cheri Bustos (D-IL) on February 5, 2018. See: Stopping Improper Payments to Deceased People Act, H.R. 4929, 115th Congress, February 5, 2018, <<https://www.congress.gov/bill/115th-congress/house-bill/4929>>.

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