March 18, 2014

Mr. John Hounsell
National Technical Information Service
5301 Shawnee Road
Alexandria, VA 22312.

Dear Mr. Hounsell:

We are writing to provide comments from our organizations in response to the Request for Information (RFI) recently issued by the National Technical Information Service (NTIS) regarding a new certification program for persons who seek access to the Social Security Administration’s Public Death Master File (DMF) at any time within the three calendar-year period following an individual’s death, as required by Section 203 of the Bipartisan Budget Act of 2013 (Pub. L. 113–67).

We are the presidents of the Population Association of America/Association of Population Centers (PAA/APC), which together represent almost 4,000 behavioral and social scientists and over 40 population research centers nationwide. Our members are population scientists, primarily demographers, economists, sociologists, and statisticians, who conduct research on the implications of population change. Federally-funded population scientists, whether they are grantees or contractors, access DMF data for many legitimate research purposes, adhering to very strict standards for data security and privacy protection. For example, two well-respected longitudinal surveys, the Health and Retirement Study (HRS) and the Panel Study of Income Dynamics (PSID), (both of which are funded by the National Institutes of Health and National Science Foundation) rely on DMF data to confirm the death of study participants. Other federal grantees rely on DMF data to conduct research on a number of topics, including the causes and effects of mortality and the impact of advance care planning on end-of-life care. There is no alternative source of up-to-date reliable information on mortality available to researchers. Further, it should be noted that no population scientist has ever been accused of misusing DMF data. In fact, population scientists are recognized for developing innovative approaches, such as secure data enclaves, to protect sensitive data sets. An example of how these secure data enclaves operate is described on the home page of the Michigan Center on the Demography of Aging at: http://micda.psc.isr.umich.edu/enclave/. We believe this description of how a secure enclave operates addresses many of the security questions posed by the RFI.

The law suggests that only those with a legitimate fraud prevention or a legitimate business purpose “pursuant to a law, governmental rule, regulation, or fiduciary duty” can qualify for earlier access to DMF data. We hope that the NTIS certification program will designate researchers, specifically federal grantees and contractors, as eligible participants in this program, too. If scientists are unable to qualify for more timely access to the DMF, their ability to conduct timely, relevant research will be hampered, forcing them to expend resources and time pursuing the status of study participants rather than focusing on potentially life-saving research. These problems can be avoided if the certification program clearly states that federal scientists, grantees and contractors alike, are eligible to participate...
provided they meet strict standards for safeguarding DMF data. Certainly, while the certification program is being formulated, we hope federal grantees and contractors will be able to continue accessing DMF data.

Thank you for this opportunity to comment on the RFI. Please do not hesitate to contact us or Mary Jo Hoeksema, Director, PAA/APC Office of Government Affairs, at paaapc@crosslink.net, if you have any questions.

Respectfully,

Pamela J. Smock, Ph.D., APC President

Robert A. Moffitt 2014 PAA President