

UNITED STATES DEPARTMENT OF COMMERCE  
NATIONAL TECHNICAL INFORMATION SERVICE

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PUBLIC COMMENT ON CERTIFICATION PROGRAM FOR  
ACCESS TO THE DEATH MASTER FILE

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MARCH 4, 2014

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ALEXANDRIA, VIRGINIA

PRESENT:

DON HAGEN, Moderator; Associate Director, Office  
of Product Management and Acquisition,  
National Technical Information Service  
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1 P-R-O-C-E-E-D-I-N-G-S

2 MR. FITZGERALD: - submitting  
3 written comments in response to the RFI.  
4 There are five areas of primary interest and  
5 concern to us. These include, one, ensuring  
6 continuity of access to the DMF to certified  
7 users during the process of developing and  
8 adopting regulations.

9 Two, defining and regulating  
10 certified users to include all those who meet  
11 the requirements for such designation  
12 including third party vendors servicing  
13 legitimate users.

14 Three, ensure reasonable  
15 operational criteria for certified users.

16 Four, ensure protection of the DMF  
17 against identity theft and fraud.

18 Five, ensure the highest quality  
19 of DMF data for certified users.

20 Again, our written submission will  
21 be much more extensive, but one particular  
22 item of the five I'd spoke with I'd to

1 embellish a little bit on are there are a  
2 number of third party vendors that currently  
3 access the DMF on behalf of several thousand  
4 small life insurance, annuity companies,  
5 pensions, life settlement companies, and non-  
6 profit organizations.

7           These thousands of clients provide  
8 names and Social Security Numbers to the third  
9 party vendors who in turn run these numbers  
10 against the DMF to provide the results to the  
11 companies.

12           The data runs, range from as few  
13 as 100 names to as many as 100,000 names. For  
14 many organizations, pensions chair this is  
15 cost effective to outsource their need for  
16 death data for such relatively small data  
17 runs.

18           In other words it would be cost  
19 prohibitive for many of these companies to  
20 obtain the DMF themselves, and undertake the  
21 data runs themselves as it would require them  
22 to have facilities, personnel, and software in

1 order to undertake the runs themselves.

2 As such, they outsource this to  
3 third party vendors. Senator Casey emphasized  
4 the need to - the valuable role of these  
5 third party vendors on the floor during the  
6 consideration of the budget act.

7 Now, on behalf of third party  
8 vendors and the legitimate users, or their  
9 customers, we look forward to working with the  
10 department in forging the definitions and  
11 accompanying regulations for third party  
12 vendors, and legitimate users who utilize  
13 these vendors. Thank you for providing this  
14 opportunity. I'll provide these comments in  
15 writing.

16 MR. HAGEN: Thank you Mr.  
17 Fitzgerald. That was acg-consultants.com.  
18 Brooke Hayes Stringer from the National  
19 Association of Insurance Commissioners.

20 MS. STRINGER: Thank you. My  
21 name's Brooke Stringer, and I am here to  
22 represent the National Association of

1 Insurance Commissioners. The NAIC is the U.S.  
2 standard setting and regulatory support  
3 organization that is created and governed by  
4 the 50 state insurance regulators as well as  
5 from D.C. and the five U.S. territories.

6 In January the NAIC sent a letter  
7 to the Commerce Secretary which we have  
8 provided to all of you, happy to provide  
9 another copy of that. In our letter we  
10 highlighted some critical insurance regulatory  
11 matters for consideration, and we also  
12 encouraged the prompt development of a  
13 certification system. So today I'd just like  
14 to highlight some of the main points from that  
15 letter.

16 While Congress's restriction on  
17 access to the DMF are important privacy  
18 protections to prevent fraud and identity  
19 theft, the NAIC believes the law should be  
20 implemented in a manner that balances those  
21 privacy protections with insurance policy  
22 holder protections that have been enacted in

1 state law or otherwise implicated in  
2 settlements among certain states and certain  
3 life insurers.

4 State insurance regulators believe  
5 that life insurers have a legitimate business  
6 purpose for DMF information. Life insurers  
7 are able to use the DMF to identify deceased  
8 policy holders which enables them to attempt  
9 to notify beneficiaries of policy proceeds.

10 Several state laws and regulations  
11 require life insurers to check their list of  
12 in force life insurance policies and retained  
13 assets accounts against the DMF and notify  
14 beneficiaries of the existence of identified  
15 policies, and the need to submit a claim.

16 Nine states have enacted laws  
17 requiring life insurers to consult the DMF for  
18 cross reference purposes at specified  
19 intervals. In addition, several state  
20 insurance regulators, coordinating through the  
21 NAIC, are currently investigating the  
22 country's top life and annuity insurers.

1                   And many states have adopted  
2 multi-state settlements with certain life  
3 insurers which require insurers to access and  
4 cross-reference the DMF on a monthly or a  
5 quarterly basis. Consequently, life insurers  
6 need prompt and uninterrupted access to the  
7 DMF in order to be compliant.

8                   The NAIC appreciates the  
9 department's decision to maintain  
10 uninterrupted access to the DMF until the  
11 certification program is established. To the  
12 extent that the department does not have a  
13 certification process in place by March 26, we  
14 would urge Commerce and the Administration to  
15 continue allowing life insurers uninterrupted  
16 access so as not to delay benefits to policy  
17 holders.

18                   And as you've mentioned today  
19 potentially this and the Department are  
20 looking at a short term temporary approach  
21 that could be put in place until the final  
22 process can be developed.



1                   So, in conclusion, as the program  
2                   is developed we would strongly urge you to  
3                   ensure that the new program is not overly  
4                   burdensome to life insurers such that it would  
5                   effectively act as a bar to their access to  
6                   the DMF, thereby undermining an important  
7                   policy holder protection.

8                   The insurance regulators look  
9                   forward to continued coordination with you all  
10                  to ensure a smooth transition period and a  
11                  prompt development of a certification process  
12                  to ensure that state insurance regulators can  
13                  continue to advance critical consumer  
14                  protection efforts. Thank you.

15                  MR. HAGEN: Thank you, Ms.  
16                  Stringer. Carla McGlynn, Unclaimed Property  
17                  Consulting & Reporting, LLC. I'm sorry, could  
18                  we repeat that please?

19                  MR. MAYER: My name's Dan Mayer.  
20                  I'm going to speak for Carla. I also signed  
21                  up.

22                  MR. HAGEN: Okay, Dan, I have you.

1 Go ahead, yes.

2 MR. MAYER: Okay, so thank you for  
3 having us. Dan Mayer, Unclaimed Property  
4 Consulting & Reporting. We are an unclaimed  
5 property consulting firm. However, we  
6 provide, as Ms. Stringer and Mr. Fitzgerald  
7 both presented, services to the insurance  
8 industry in regards to meeting and finding  
9 potential deaths in a policy book for the  
10 companies.

11 So we are a third party firm, and  
12 we specifically do it as a part of the  
13 unclaimed property requirements for all 50  
14 plus jurisdictions in the U.S.

15 As a part of that, as Ms. Stringer  
16 indicated, there are many statutory,  
17 regulatory, and audit conclusions that have  
18 required over the past few years the use of  
19 the Death Master File, current Death Master  
20 File, to identify and allow insurers and  
21 annuity companies to meet the requirements  
22 submitted through the various state statutory

1 requirements as well as audits, either on a  
2 monthly or quarterly basis performing matches.

3 And what our firm actually does  
4 is, we utilize the current DMF in meeting  
5 those requirements both in terms of exact and  
6 fuzzy matches to the DMF based on the  
7 requirements set forth in the statutes.

8 The second thing, and Mr.  
9 Fitzgerald eloquently put this out there, that  
10 the requirement for certification, we ask that  
11 it be more definitively defined to allow for  
12 whether a third party that we're providing the  
13 information back to, the insurer or the  
14 annuity company, can actually have access to  
15 that information without re-meeting the  
16 certification requirements, or they actually  
17 meet the certification requirements without  
18 going through the submission process.

19 And lastly, we would ask that, you  
20 know, consideration be given for the costs  
21 associated with this. As everyone is aware,  
22 Ms. Stringer indicated too, that we would want

1 it to be a measure that allows for a  
2 reasonable cost expectation including the  
3 quarterly or whatever audits that may be  
4 presented as a part of the NTIS's requirement  
5 to substantiate the rules under the Internal  
6 Revenue Code section. So, and thanks a lot.

7 MR. HAGEN: Thank you, Mr. Mayer.  
8 Felix Federowicz, I'm sorry.

9 MR. FEDEROWICZ: Federowicz.

10 MR. HAGEN: Say it again? So I  
11 don't really -

12 MR. FEDEROWICZ: Federowicz.

13 MR. HAGEN: Federowicz, thank you.  
14 Thank you. He's with berwyngroup.com.

15 MR. FEDEROWICZ: Yes. Thank you,  
16 and it's awful nice to -- we've been  
17 subscribing to the Master Death File for over  
18 20 years and I don't think I've ever met  
19 anybody on the organization, so.

20 MR. HAGEN: Here we are.

21 MR. FEDEROWICZ: Here you are.  
22 Okay, the Berwyn Group has been serving the

1 pension, life insurance, and financial  
2 services industry for these past 20 years, and  
3 we started out by using the Master Death File  
4 to help pension funds identify deceased  
5 individuals that were cashing checks.

6 Now of course they weren't cashing  
7 the checks themselves, but someone was cashing  
8 them fraudulently on their behalf. Okay?

9 Our company in the pension  
10 industry represents hundreds of individual  
11 companies with thousands of pension funds, and  
12 millions, I mean millions, of subscribers.

13 And our work basically saves  
14 countless millions, if not billions of  
15 dollars, stopping fraudulent payments that --  
16 that money could be used for the current  
17 rightful beneficiaries, or future  
18 beneficiaries. So it's really important work  
19 that we do.

20 Brooke represents the NAIC. We  
21 also do work with the insurance companies  
22 right now based on their new statutory

1 requirements over the last couple years that  
2 require them to audit their files proactively  
3 for deceased individuals. They call that  
4 unclaimed property. People are dead that they  
5 don't know are dead.

6 Like, Uncle Jimmy buys a policy  
7 for little Tommy and never tells little Tommy.  
8 He drops dead, and so now the insurance  
9 company has an insurance policy, and, you  
10 know, the -- as opposed to letting the clock  
11 run out on that, there are now requirements  
12 that they audit.

13 We basically audit probably with  
14 our life insurance customers, of which we have  
15 about 60, we're doing 20 to 30 million records  
16 a month against the Master Death File  
17 identifying deceased individuals that would  
18 not otherwise be reported. So it's very, very  
19 important work that we do on behalf of our  
20 customers.

21 We meet the requirements in the  
22 new code, you know, we -- our customers have

1 a legislative or fiduciary obligation to do  
2 this work, and we support them in that work.  
3 We basically only do this kind of work. We  
4 don't do anything beyond that.

5 As far as the credentialing  
6 process, if you have to go through a process  
7 of credentialing, companies like the Berwyn  
8 Group that have been at it for 25 years, have  
9 a large financial impact to our customers.

10 So if you were to stick us at the  
11 back of the pack, you know, you put the  
12 biggest impact at the back. You've really got  
13 to move the people up to the front of the pack  
14 who have been doing this for a long, long  
15 time, and have a big financial impact to the  
16 industry.

17 In terms of the security, we've  
18 been at this for a long time. Our customers  
19 have asked us to be secure. We've been  
20 audited by all of our large customers. We've  
21 had security firms come in and audit us.

22 We've had life insurance companies

1       come in and audit us. We've had banks come in  
2       and audit us. And so we decided about five to  
3       seven years ago to voluntarily subject  
4       ourselves to the AICPA guidelines for  
5       insurance security, and we are SOC 2 approved.

6               So, I would recommend as a part of  
7       your credentialing process that you request  
8       that your firms, even in this new thing you  
9       put up, the notational application, I'm sorry.

10              The notional application -- that  
11       part of that is send us a copy of your  
12       certification if you've been certified, that  
13       you are safe. Show us that you're safe, okay?  
14       We can do that, and your customers, your  
15       subscribers who are serious about security  
16       could be able to do that.

17              The third thing that I would  
18       finally say is that more information is better  
19       than less information. There was a time that  
20       you actually gave us the -- say the state  
21       where the person died, you know, or the last  
22       known address.



1 Well that really helps our  
2 customers and us focus in on, well, someone's  
3 died. Now we got to go to death certificate  
4 because we just can't just cut off benefits  
5 because it could be an error in the social  
6 security file. You know, it can happen. We  
7 can't just cut off benefits.

8 We've got to go find and locate a  
9 death certificate. Well having that state  
10 gives you a place to go, okay? And of course  
11 the Numident File, of course, doesn't really  
12 give you everything that you need to know.

13 There's - we have a lot of our  
14 customers are like state teachers' retirement  
15 systems, and they'll say to us, well we don't  
16 participate in Social Security.

17 So the Social Security doesn't  
18 really release those deaths though because  
19 they don't have any reason to release them  
20 because they don't have to stop the benefit.

21 So, I think you really have to  
22 really rethink your release process to make

1 more data available that's useful for these  
2 purposes, and that would be the gist of what  
3 I had to say. Thank you very much.

4 MR. HAGEN: Thank you, Mr.  
5 Federowicz, thank you very much. Jason  
6 Goldman. Jason Goldman is from the U.S.  
7 Chamber of Commerce.

8 MR. GOLDMAN: Thanks very much.  
9 My name is Jason Goldman. I am the Senior  
10 Telecom and Policy Counsel for the U.S.  
11 Chamber. As many of you know the Chamber is  
12 the world's largest business federation  
13 representing the interests of more than 3  
14 million businesses and organizations, every  
15 size, sector and region, and dedicated to  
16 promoting and defending America's free  
17 enterprise system.

18 The Chamber appreciates the  
19 opportunity to comment here today about the  
20 Death Master File Certification Program. The  
21 Chamber urges NTIS to ensure that all current  
22 legitimate users of the DMF have access to the

1 DMF, under the certification program required  
2 by the Bi-Partisan Budget Act of 2013, and  
3 that those users have uninterrupted access to  
4 the DMF while the program is being developed  
5 and implemented.

6 Consistent with the Act, the  
7 Chamber strongly urges NTIS to craft a  
8 certification program that embraces the many  
9 important uses of the DMF. Additionally, the  
10 Chamber supports the redistribution of the DMF  
11 by certified entities to third parties to  
12 accomplish legitimate business purposes.

13 There are many examples of these  
14 legitimate business purposes and how those --  
15 and how they're used for the DMF. Life  
16 insurance companies, as some person said, are  
17 required by state law to use the DMF to  
18 identify deceased, insured individuals, pay  
19 policy proceeds, and distribute unclaimed  
20 funds. Developers of identity authentication,  
21 verification, and screening tools, and other  
22 re-distributers of the DMF assist businesses

1 in detecting and preventing fraud against  
2 consumers.

3 Companies incorporate DMF data  
4 into products and services used by other  
5 corporations, the legal industry, law  
6 enforcement, and government agencies' anti-  
7 fraud efforts, investigations, research and  
8 similar purposes.

9 And additionally pension funds,  
10 banks, credit unions, credit card issuers and  
11 other financial service entities use the DMF  
12 to protect and benefit consumers.

13 Retirement plans also use the DMF  
14 to make payments to the correct recipients and  
15 the correct amounts, and for determining when  
16 a plan's beneficiary becomes eligible for  
17 payment. The DMF is also used to exclude  
18 deceased individuals from receiving financial  
19 offers, fund raising solicitations, and other  
20 marketing activities.

21 The DMF, again, helps to identify  
22 deceased individuals for exclusion from

1 payment of future benefits from programs such  
2 Medicare, Medicaid, Welfare, and Unemployment.  
3 The Chamber appreciates the opportunity to  
4 speak here today, and plans to file more  
5 extensive written comments on the AG. Thank  
6 you very much.

7 MR. HAGEN: Thank you Mr. Goldman.  
8 Tom Litjen from PCI, which is Property  
9 Casualty Insurers Association of America.

10 MR. LITJEN: Good morning. My name  
11 is Tom Litjen. I represent the Property  
12 Casualty Insurers Association of America.  
13 It's a trade association of over 1000 property  
14 casualty writers in all states throughout the  
15 country. I appear today to urge continued  
16 access to the Death Master File on behalf of  
17 the property casualty industry.

18 As property casualty insurers we  
19 often find ourselves in the position of paying  
20 disability payments, continuing medical  
21 payments, payments of all sorts to  
22 individuals, and we need the access to the

1 Death Master File to ascertain whether those  
2 individuals have passed.

3 We, of course, in the insurance  
4 industry amass a great deal of personal  
5 information from our policy holders. We are  
6 very emphatic about maintaining the privacy,  
7 the confidentiality of that information, and  
8 we will -- believe that the property casualty  
9 industry needs continued access to the Death  
10 Master File to prevent fraud.

11 It's estimated that fraud costs  
12 the property casualty industry about \$80  
13 billion a year, and the Death Master File is  
14 a -- access to the Death Master File is a key  
15 component of reducing or eliminating that  
16 fraud which ultimately, obviously, costs  
17 consumers. Thank you very much. We will be  
18 submitting extensive written comments for the  
19 record. Thank you.

20 MR. HAGEN: Well thank you Mr.  
21 Litjen. Eric Ellman, Public Policy and Legal  
22 Affairs Consumer Data Industry Association.

1 Is Eric here? He is, sorry.

2 MR. ELLMAN: Good morning. I'm  
3 Eric Ellman, Senior Vice President of Public  
4 Policy and Legal Affairs with the Consumer  
5 Data Industry Association, CDIA, in  
6 Washington, D.C.

7 CDIA is a national trade  
8 association which represents companies that  
9 aggregate data to third party databases which  
10 are then used by American businesses to manage  
11 a variety of risks, such as the likelihood of  
12 payment, fraud potential, ability to pay,  
13 underwriting risk, applicant, and applicant on  
14 OPAC lists, et cetera.

15 Our members do not sell data to  
16 the general public. Our members are regulated  
17 by the number of federal laws including Title  
18 V of the Gramm-Leach-Bliley Act, the Federal  
19 Fair Credit Reporting Act, the Driver's  
20 Privacy Protection Act, or DPPA, and even  
21 Section V of the FTC Act concerning unfair and  
22 deceptive trade practices.

1                   Our members that use the DMF for  
2 business to business, or B2B transactions,  
3 they are obligated to maintain data security  
4 standards via a variety of laws including some  
5 of those that I mentioned like GLBA, FCRA, and  
6 the FTC Act.

7                   These standards include insuring  
8 that there is a contract between each customer  
9 who wishes access to the data, and a careful  
10 customer on-boarding process in order to  
11 ensure the legitimacy of the company seeking  
12 access.

13                   Our members may re-distribute DMF  
14 data to their customers, or they may use DMF  
15 data to update their databases of data and not  
16 actually load the DMF data for re-  
17 distribution.

18                   Our members are in aggregate  
19 likely the largest channels of distribution  
20 for DMF data provided to the American business  
21 community in a safe, regulated and secure  
22 manner.



1                   Examples of our members' customers  
2 include banks, some of the largest financial  
3 institutions, credit unions, insurers,  
4 retailers, as well as state and local  
5 governments. The uses of the DMF data fall  
6 squarely within the four corners of the  
7 exceptions to the prohibitions on disclosing  
8 during the three year period.

9                   All forms of identity management  
10 ultimately are tied to the potential of  
11 identifying a fraudulent transaction and laws  
12 such as the FCRA which require, "reasonable  
13 procedures to ensure the maximum possible  
14 accuracy" of the data.

15                  We applaud the decision to allow  
16 continued DMF data while the certification  
17 process is established. The decision protects  
18 consumers. We urge you to continue to keep  
19 the DMF available even during the  
20 certification process is established, and  
21 until legitimate users such as our members are  
22 certified.

1                   Cutting them off data would harm  
2 American business, and I think you've heard a  
3 couple of previous commentators discuss this  
4 interim period. We are concerned, what are  
5 the intentions regarding access to the DMF  
6 data even after the certification process is  
7 working?

8                   If the DMF is shut down when the  
9 new certification goes online, will current  
10 subscribers be cut off? It's unclear how long  
11 this backlog will take to be cleared.

12                   And there will be, we understand,  
13 potentially market asymmetries when companies  
14 get access first while others wait in line to  
15 get final certification. Those are our  
16 comments. We will be filing extensive written  
17 comments follow up to this meeting. And I  
18 thank you for your time and attention.

19                   MR. HAGEN: Thank you Mr. Ellman.  
20 Joseph Rubin, the Debt Buyers Association.

21                   MR. RUBIN: My name's Joe Rubin.  
22 I'm with the law firm Arnold, Goldman, and

1 Gregory. Thank you very much for having us  
2 today. I'm here on behalf of the Debt Buyers  
3 Association. So DBA members purchase debt,  
4 distressed debt, from original creditors, or  
5 from other debt buyers, and then use  
6 collection methods to collect that debt.

7 DBA members are heavily regulated  
8 by the Fair Debt Collection Practices Act.  
9 They're also regulated by Gramm-Leach-Bliley.  
10 They are a financial institutions.

11 They're regulated by the Telephone  
12 Consumer Protection Act, by the CFPB, by the  
13 FTC, by HIPAA in many cases, and they also  
14 have a very stringent DBA self-certification  
15 program which includes additional data  
16 security and other consumer protection  
17 requirements.

18 So the interest of DBA members in  
19 the Death Master Files is very pro-consumer,  
20 and there are a couple ways that they use it.  
21 First, they scrub the list.

22 When they are about to purchase

1 debt, or they are about to sell debt, they  
2 scrub the list to make sure that there are no  
3 deceased individuals on those lists to make  
4 that they're not selling or buying debt from  
5 a deceased individual.

6           They also scrub lists to ensure  
7 that they're not going to be contacting a  
8 deceased individual. You know, obviously  
9 nobody wants to receive a call in that  
10 circumstance from a debt collector, or a debt  
11 buyer.

12           So we want to make sure that we  
13 are contacting those folks and that if  
14 somebody has been deceased that we'll use  
15 alternative collection efforts, or that we  
16 will send the case to probate, or do whatever,  
17 take whatever appropriate steps are necessary  
18 to ensure that contact is appropriate and  
19 doesn't annoy individuals.

20           One additional point that's been  
21 raised a couple times, we also want to make  
22 sure that the DMF is available during the

1 certification process. Obviously, these  
2 efforts will continue, and we think that's an  
3 important thing, but thank you very much for  
4 your time.

5 MR. HAGEN: Thank you Mr. Rubin.  
6 Grace Henke, is Grace here? No. Okay, I go  
7 to my second list. Amanda Sozer from FNA  
8 International.

9 DR. SOZER: Good morning. My name  
10 is Dr. Amanda Sozer, and I'm the President of  
11 SNA International, a small business located in  
12 Alexandria, Virginia. SNA International  
13 specializes in forensics and human  
14 identification.

15 We have been involved in many  
16 important human identification projects. For  
17 example, our founders were sent by the  
18 National Institute of Justice to New York City  
19 to help in the DNA identification of the  
20 victims of the World Trade Center, and SNA  
21 managed the DNA identification of the  
22 Hurricane Katrina victims.

1 More recently, we've been hired by  
2 the U.S. Army to research and find those  
3 eligible to contribute DNA family reference  
4 samples to aid in the repatriation of remains  
5 of our unaccounted for Army servicemen as  
6 mandated by Congress.

7 SNA International has a team of  
8 certified genealogists who conduct genealogy  
9 research in an effort to identify the primary  
10 next of kin and closest DNA eligible living  
11 relatives of these soldiers.

12 SNA International's role in this  
13 important program is to be the initial conduit  
14 between the Army and the families. In essence  
15 we are the researches hired to locate family  
16 members that once identified and located, the  
17 Army can reach out to them and ask them to  
18 participate in this repatriation program.

19 SNA's genealogists are all board  
20 certified by the Board of Certification of  
21 Genealogist, or they are accredited by the  
22 International Commission for the Accreditation

1 of Professional Genealogists. Most of them  
2 are members of the Council for the Advancement  
3 of Forensic Genealogy. These organizations  
4 evaluate and are credentialed genealogists.

5 The Death Master File is  
6 absolutely essential for a genealogist to do  
7 the work they do, to locate the next of kin  
8 and DNA donors for soldiers missing from past  
9 wars.

10 For example, the siblings of our  
11 World War II missing servicemen are critical  
12 DNA donors who are in their late 80's and  
13 90's. Many of these individuals have died  
14 within the last three years. We must access  
15 their death dates in order to locate an  
16 obituary and find living children, the  
17 soldier's nieces and nephews.

18 It is important that our  
19 genealogists as well as other genealogists who  
20 are working for other military branches have  
21 the ability to directly access Death Master  
22 File themselves.

1                   These certified genealogists might  
2                   access the Death Master File one or two dozen  
3                   times for each case. They may return to the  
4                   Death Master File multiple times as they learn  
5                   location, a full name, or birth, or other  
6                   information that may be uncovered.

7                   Limiting our genealogists' access  
8                   to the Death Master Registry would impede  
9                   important progress the Army is currently  
10                  making in identifying the servicemen missing  
11                  from past conflicts.

12                  Additionally, as a small business,  
13                  I am concerned that the process could be  
14                  financially burdensome. Thank you for the  
15                  opportunity to speak today, and we will be  
16                  following up with complete written response to  
17                  your RFI questions. Thank you.

18                  MR. HAGEN: Thank you Ms. Sozer.  
19                  Thank you very much. Courtney Yohe, I  
20                  believe? Courtney do I have the last name  
21                  correct? Yohe? Okay, I was not too far off.  
22                  Courtney's with the -- Ms. Yohe is from the



1 Society of Thoracic Surgeons. Thank you.

2 Thoracic. I was close on that, too, you know?

3 MS. YOHE: But I'll do it for you  
4 again here.

5 MR. HAGEN: Thank you.

6 MS. YOHE: My name is Courtney  
7 Yohe, and I'm the Assistant Director of  
8 Government Relations for the Society of  
9 Thoracic Surgeons. Thank you for the  
10 opportunity to present these comments.

11 Founded in 1964, the Society of  
12 Thoracic Surgeons is an international not for  
13 profit organization representing more than  
14 6700 members located in 85 countries who are  
15 dedicated to ensuring the best possible  
16 outcome for surgery of the heart, lungs,  
17 esophagus as well as other surgical procedures  
18 within the chest.

19 The STS National Database was  
20 established in 1989 as an initiative for  
21 healthcare quality improvement and patient  
22 safety. The STS National Database has three

1 components, Adult Cardiac, General Thoracic,  
2 and Congenital Heart Surgery.

3 STS is also partnered with the  
4 American College of Cardiology to create the  
5 STS/ACC TVT Registry, a data repository  
6 developed to track patient safety and real  
7 world outcomes related to the transcatheter  
8 aortic valve replacement procedure.

9 Launched in 2011, the STS Research  
10 Center is a nationally recognized leader in  
11 patient outcomes research. With a wealth of  
12 data in the STS National Database, the center  
13 supports cutting edge clinical research that  
14 is designed to improve surgical outcomes and  
15 the quality of patient care.

16 Because the STS National Database  
17 and TVT Registry do not collect long term  
18 clinical data, linking these registries with  
19 the Social Security Death Master File allows  
20 for the verification of life status of  
21 patients who would otherwise be lost for  
22 followup after treatment.

1 Utilizing clinical data combined  
2 with claims information and the Death Master  
3 File, STS has been able to provide long term  
4 information on patient treatment outcomes, and  
5 estimate patient survival rates.

6 STS members use this information  
7 to evaluate the respective outcomes against  
8 national standards or benchmarks. Outcomes  
9 data also helps physicians, patients, and  
10 their families to make informed treatment  
11 decisions.

12 The Society also uses this  
13 information to facilitate research comparing  
14 the long term effectiveness of alternative  
15 treatment strategies based on patient  
16 demographics.

17 As a medical society, STS has long  
18 advocated for the protection of patients and  
19 our member's privacy. The STS National  
20 Database upholds rigorous privacy protocols,  
21 and is fully compliant with the Health  
22 Insurance Portability and Accountability Act

1 requirements, and Federal Common Rule  
2 protections for human subjects research.

3 STS, through its contracts with  
4 the Duke Clinical Research Institute,  
5 maintains patient identifier information  
6 separately from clinical or other demographic  
7 data.

8 Externally derived data like those  
9 from the Death Master File are used to  
10 supplement the data in the individual record,  
11 but these clinical patient level data never  
12 leave the database except in de-identified  
13 form.

14 The Society of Thoracic Surgeons  
15 has a legitimate business purpose pursuant to  
16 the Illinois General Not For Profit  
17 Corporation Act of 1986, and Section 501(c)(6)  
18 of the Internal Revenue Code.

19 The quality improvement activities  
20 conducted by members of the Society illustrate  
21 STS's business purpose to reflect our central  
22 mission to enhance the ability of

1 cardiothoracic surgeons to provide the highest  
2 quality patient care through education,  
3 research, and advocacy.

4 Further, the Society is also  
5 pursuing recognition of the adult cardiac  
6 surgery database as a qualified clinical data  
7 registry under newly implemented provisions of  
8 the American Tax Payer Relief Act of 2012.

9 We look forward to working with  
10 you to ensure that STS can use data from the  
11 Death Master File with appropriate protections  
12 in place to continue these vital research and  
13 quality improvement activities. We'll be  
14 providing written comments. Thank you for  
15 your time and attention.

16 MR. HAGEN: Thank you, Ms. Yohe.  
17 Robbie Meyer, American Council of Life  
18 Insurers.

19 MS. MEYER: Good morning.

20 MR. HAGEN: Good morning.

21 MS. MEYER: My name is Robbie  
22 Meyer, appearing before you today on behalf of

1 the American Council of Life Insurers. The  
2 ACLI is a Washington, D.C. based trade  
3 association with approximately 300 member  
4 companies that do business across the United  
5 States and abroad. We appreciate the  
6 opportunity to appear before you today, and  
7 thank you very much for this opportunity.

8 To underscore and embellish just a  
9 little bit upon the comments that have been  
10 made by a number of others earlier --  
11 continued, uninterrupted access to the DMF by  
12 life insurance companies, and third parties  
13 that work for or on behalf of life insurers  
14 for legitimate business purposes and  
15 legitimate fraud prevention purposes is  
16 absolutely critical for life insurer's ability  
17 to comply with state unclaimed property  
18 settlement agreements, state unclaimed  
19 property laws, and to detect and prevent  
20 against fraud.

21 Any interruption in life insurers'  
22 access to the DMF could inadvertently hinder

1 families from obtaining life insurance  
2 benefits for which they're eligible, and  
3 jeopardize life insurers ability to most  
4 effectively protect against fraud and  
5 erroneous payments in claims for life  
6 insurance policies, for annuities, for  
7 disability income policies, and a connection  
8 with long term care policies. It could also  
9 jeopardize their ability to protect against  
10 fraud in the issuance of new insurance  
11 policies.

12 To provide a few specifics as to  
13 the unintended but very harmful consequences  
14 that could result from any interruption in  
15 life insurers' access to the DMF, since 2013,  
16 13 insurance companies representing about 55%  
17 of the premiums collected for all insurance  
18 policies have entered into regulatory  
19 settlements with state officials from 30  
20 states.

21 Nationally, these settlement  
22 agreements have resulted in over \$173 million

1 being paid directly to beneficiaries by  
2 insurance companies, and over \$800 million  
3 being paid or sheeted to state which continue  
4 efforts to locate and pay insurance  
5 beneficiaries.

6 The states of Florida, California,  
7 Illinois, North Dakota, New Hampshire, and  
8 Pennsylvania are serving as leading states in  
9 examinations of the 40 largest insurance  
10 groups which comprise more than 92 percent of  
11 the insurance, life insurance, and annuity  
12 market nationwide.

13 One goal of these examinations is  
14 to require all 40 of these large insurance  
15 groups to use and rely upon the Death Master  
16 File. In addition, as has already been  
17 stated, nine states have already enacted  
18 statutes that require life insurers to use the  
19 Death Master File. It's my understanding that  
20 now 11 state legislatures are in the process  
21 of considering similar legislation.

22 So any interruption or loss of



1 life insurers or third parties who work for  
2 them for legitimate fraud prevention, or  
3 business purpose, any interruption in their  
4 access to the DMF would actually make it  
5 impossible for life insurers to comply with  
6 these settlement agreements, and to comply  
7 with these state laws which are already on the  
8 books and being considered. And also, as I  
9 indicated, further could significantly  
10 jeopardize their ability to protect against  
11 fraud.

12 So we encourage you as you're  
13 already doing, clearly, to make every effort  
14 to ensure uninterrupted, continued access to  
15 the DMF for life insurers, and, again, third  
16 parties that work on their behalf for  
17 legitimate business and fraud prevention  
18 purposes.

19 We were going to suggest to you as  
20 one possibility, something to consider, is an  
21 interim certification process. Like, it  
22 sounds like, you all are taking under

1 consideration. Of course, we'll have to take  
2 a look at the details of what you propose, but  
3 that was an idea that we were going to  
4 suggest.

5 So we very much look forward to  
6 working with you all and thank you for the  
7 opportunity. We will be submitting written  
8 comments.

9 MR. HAGEN: Thank you Ms. Meyer.  
10 That concludes the list of individuals who  
11 have signed up for the three minute segments.  
12 Is there anyone I've missed in the audience  
13 who would like to come forward?

14 And I think if not, we don't have  
15 anyone signed up from the web that I can tell.  
16 Okay, so we're good to go. With that I'd like  
17 to take about a ten minute break, if you don't  
18 mind.

19 They have, in the back of the room  
20 the, let me underline this, notional draft  
21 certification form in the back of the room.  
22 I don't know if anybody, if that can be

1       communicated any more, that this is a draft.  
2       This is for that purpose only, as a draft.  
3       You are welcome to pick that up.

4                   What we'll try to do is reconvene  
5       and try to, again, this is not a discussion.  
6       It's actually to hear more, but I want to  
7       convene with the group here to see if there's  
8       any particular questions that we'd like to  
9       have addressed by the audience.  So let's  
10      reconvene here right at 11:00.  Thank you.

11                   (Whereupon, the foregoing matter  
12      briefly went off the record and went back on  
13      the record at 11:00 a.m.)

14                   MR. HAGEN:  If we could just come  
15      back to order.  If you don't mind, we have  
16      people on the web that we need to keep alive  
17      and keep engaged.  For those of you on the  
18      web, one of the things, one of the points that  
19      I want to remind people, is that you have an  
20      ability on the web to write in a comment in  
21      the notes, and send to our webmaster, or  
22      person, whoever's in the back of the room

1 behind the dark windows, who will then pass  
2 that comment on to me.

3 But I want to remind people on  
4 that side is what I've gotten so far, I've  
5 gotten two interactions with people on the  
6 web. So this is working. The WebEx is  
7 working, but they're questions, not comments.  
8 And so, what I'm looking for are really  
9 comments that can kind of add to the process  
10 going forward here.

11 With that said I think what we'd  
12 like to do now is, since we have time, it's  
13 only a little after 11:00, if there's any  
14 compelling points that were not brought up  
15 from the presenters this morning that we want  
16 to, if someone wants to remind us, or tell us  
17 again, or just bring something new to the  
18 floor, now is the time to do that. So we're  
19 now not into the three month limitation, but  
20 don't get carried away. So please, again, use  
21 the mic and identify yourself as you come to  
22 the mic, if there are any.

1 MS. SOZER: This is Amanda Sozer  
2 from SNA International. During the break I  
3 was asked a question. Are there other  
4 databases that our genealogists could use to  
5 get the same information?

6 And I am not aware of any other databases that  
7 they could use to get the same information.  
8 It's really critical for them to do their  
9 research, and, you know, they'll go in and  
10 they will look things up, they'll get  
11 information, they'll look it up again.  
12 They're not looking for the Social Security  
13 Number, but they're looking for the other  
14 information that's in that database. So it's  
15 really very critical for them to do this time  
16 sensitive research.

17 MR. HAGEN: Can I ask a question  
18 on top of that?

19 MS. SOZER: Okay.

20 MR. HAGEN: Is it a question of  
21 content in other sources, or is it a question  
22 of timeliness in other sources, or any other

1 factors?

2 MS. SOZER: Yes, and what I'd like  
3 to do if I can, if I can copy, Ms. Maris  
4 (phonetic) is one of our certified  
5 genealogists whose on the web, is it possible  
6 for her to answer that question?

7 MR. HAGEN: She can write a comment  
8 in, and we'll read it from here.

9 MS. SOZER: Okay, perfect, yes.

10 MR. HAGEN:: It's not ideal, but  
11 that's the best we can do for now.

12 MS. SOZER: Yes, but I think it's  
13 really about the content, and she can answer  
14 that, you know, much better than I can, and  
15 much more thoroughly than I can.

16 MR. HAGEN: So the answer is, no.  
17 We can, there is nothing else that matches the  
18 DMF content.

19 MS. SOZER: I believe that's  
20 correct, yes.

21 MR. HAGEN: For your usage.

22 MS. SOZER: Yes.

1 MR. HAGEN: Thank you.

2 MS. SOZER: Thank you.

3 MR. HAGEN: Yes, sir?

4 MR. FEDEROWICZ: I'm Felix  
5 Federowicz from the Berwyn Group. We actually  
6 acquire data from other sources. There are  
7 certain state vital statistics departments  
8 that will provide data. A lot of those  
9 sources are also starting to dry up. And so  
10 I think it's really important that, you know,  
11 we keep something open for this process, that  
12 we have right now, we have probably 110  
13 million records, of which maybe 90 million are  
14 the Social Security Administration. I think  
15 you're releasing 86 million right now. Does  
16 that make some sense? I think that's the  
17 number it is?

18 MR. HAGEN: I think we have 93  
19 million something. I think that was the last  
20 number I think we've heard.

21 MR. FEDEROWICZ: I think you  
22 dropped it because of the (inaudible).

1 MR. HAGEN: Ah, yes.

2 MR. FEDEROWICZ: Yes, it's  
3 probably 80, yes, something like that. So, I  
4 mean, for those people who are looking for the  
5 sources, I mean, we can contact State Vital  
6 Statistic Department --

7 (Inaudible due to recording  
8 equipment malfunction.)

9 MR. HAGEN: -- stand here, the  
10 extent to which the information that's in the  
11 DMF is, would be available from other sources  
12 and could be accessed by current users of the  
13 DMF in the event that NTIS were unable, for  
14 any reason, to continue providing the DMF data  
15 to the public as we alluded to earlier. So if  
16 anyone else has any insights on that either  
17 now, or through the comment period, we would  
18 very much appreciate hearing from you about  
19 that.

20 MALE PARTICIPANT: I would say  
21 that's very (inaudible) perception, some  
22 places in the Federal Government, that if the



1 DMF were to be curtailed or cut off, even for  
2 a period of time that there's other resources  
3 equivalent to it, available to you. And as a  
4 perception that we have just recently, I  
5 guess, come across, and we're trying to, we  
6 need to provide evidence from the user  
7 community that, that is a mis-perception on  
8 the part of those in the Federal Government  
9 who adhere to that belief, or that thesis I  
10 guess. So it's very important that -- if you  
11 comment on that for us.

12 MR. FEDEROWICZ: I can make a  
13 comment about that. As I mentioned, we  
14 acquire data from other sources. Some state's  
15 vital statistics department will provide it.  
16 I believe we really have, I don't want to make  
17 it public record because it, kind of, gives us  
18 a little competitive advantage, but we have  
19 probably 30 alternate sources. Some of those  
20 of which are actively acquired from states who  
21 still are willing to give the data. Many of  
22 them have been closing down over time, where

1 they're saying we won't supply it anymore.

2           So, while we have, you know, other  
3 sources, it's nowhere near adequate. It's  
4 nowhere near adequate, you know, to do our  
5 job. If all 50 states would say, okay, we're  
6 going to let you guys have access to this  
7 data, then we probably, it would be probably  
8 a better source than the Social Security  
9 Administration, because the Social Security  
10 Administration releases only the Numident  
11 File. And they don't release information, for  
12 instance, if nobody's, like if a baby dies,  
13 there's no benefits being applied for, that  
14 data never gets released.

15           And so the insurance policies  
16 related to those individuals don't get, so, I  
17 think it's really important to keep this open.  
18 It's a falsehood to think that there's  
19 alternate sources of debt data that would be  
20 able to do the job that we have done for our  
21 customers.

22           MR. HAGEN: You have a second

1 comment?

2 MR. FREIMUTH: My name is Matt  
3 Freimuth, and I represent UPCR which does this  
4 Death Master matching to the life insurance  
5 companies, and we are a small business. And  
6 trying to ascertain all the different data  
7 sources that would basically be comparable to  
8 the SS DMF is actually quite time consuming,  
9 and quite expensive. I mean, and, quite  
10 frankly, we can't really grade a database that  
11 would be comparable to that. The other point  
12 I'd like to make is that as we're looking for  
13 this, we rely on the SS DMF because the  
14 government is producing this data.  
15 And if we use other data sources we feel that,  
16 you know, we're trying to do statutory  
17 lookups. And can we rely on another source  
18 that really isn't, you know, official record,  
19 really? And that's one of our big concerns  
20 when we produce this, you know, for the  
21 matching process. Thank you.

22 MR. HAGEN: Wait a minute. Yes,

1 ma'am?

2 MS. YOHE: Courtney Yohe, the  
3 Society of Thoracic Surgeons. While I won't  
4 necessarily name what I think would be the  
5 proposed alternative for us to access, I will  
6 give you the three criteria that we've used in  
7 evaluating other options, and those are cost,  
8 you know, the other options that we've  
9 explored have been exponentially more  
10 expensive than what we were able to access  
11 through the Death Master File.

12 Definition, our specific purpose  
13 is quality improvement under various statutory  
14 authorities, and that doesn't necessarily meet  
15 the definition of what might be required to  
16 access other data sources. And then the third  
17 criterion would be timeliness. And, you know,  
18 this is something that is extremely important  
19 to our membership, because what we do with our  
20 clinical registry is provide very real-time  
21 feedback to our surgeons on their own  
22 performance, and on the value of the

1 procedures that they're performing.

2 MR. HAGEN: Sir?

3 MR. MOSS: Fred Moss with the  
4 Federation of Genealogical Societies. We have  
5 seen this statement made in some of the,  
6 several Congressional Hearings that we've  
7 monitored over the last two years, that there  
8 are alternate sources. And you have well  
9 summarized many of the problems with that. I  
10 will add to it this observation. This is a  
11 highly mobile society, and I believe that I am  
12 correct in saying that there are 58 reporting  
13 entities that provide vital statistics  
14 reporting. The 50 states, and then a number  
15 of large metropolitan areas have their own  
16 separate databases and ways of accessing.

17 Our problem is, there is no  
18 national overview for death information that  
19 I am aware of. I understand there may be some  
20 medical research databases with the  
21 limitations that were previously described,  
22 with one of them being it is a -- it requires

1 you to submit a query. And then someone with  
2 direct access to the database may actually  
3 have to conduct the search for you, which is  
4 cumbersome and expensive. And, plus, in which  
5 of those 58 jurisdictions do I go to look for  
6 it?

7           Even were the states uniform in  
8 providing accessibility, it would still be a  
9 problem, but the really bad news is the  
10 tendency there is following this same  
11 approach, that in the interest of preventing  
12 identity theft, and under the banner of  
13 protecting our privacy, we are making access  
14 even more restrictive than it has been  
15 historically.

16           Prior to 1992, most states  
17 provided public access to vital statistics  
18 data. In '92, in the '92 edition of the Model  
19 State Vital Statistics Act, was the first time  
20 where we started imposing embargo periods, and  
21 the number then used was 100 years for birth  
22 certificates, and 50 years for death,

1 marriage, divorce records. The, again, in the  
2 light of current concerns about privacy, the  
3 pending revision to the Model State Vital  
4 Statistics Act, the 2011 version would  
5 basically add 25 years to those embargo  
6 periods for general access.

7           There are ways of limiting the  
8 damage being done, but basically we've  
9 inserted another generation between living  
10 knowledge and historical records. And that  
11 basically thwarts any meaningful research.  
12 When we have time, and I will relinquish at  
13 the moment, but I would, when given an  
14 opportunity, I do want to explain some of the  
15 categories that we've identified most  
16 genealogists could endure a three year  
17 blackout of the Social Security Number. The  
18 broader data is, it would even then be a  
19 problem. Most could handle that. There are  
20 six or seven categories of folks that we've  
21 struggled to identify that we hope will help  
22 you identify those for whom a three year delay

1 will be problematic. And I'll be happy to  
2 share those as time allows.

3 MR. HAGEN: Thank you. While  
4 she's coming to the mic, we have one anonymous  
5 comment from the web. Actually I have two.  
6 One's anonymous and one is not. The anonymous  
7 one says, health and medical researchers can  
8 access vitals data through the National Death  
9 Index at CDC. That's the comment. The second  
10 comment that comes from Lillian Ingster with  
11 her organization not identified, says, as a  
12 reminder, all vital statistics data, including  
13 death data, are collected and, all caps, owned  
14 by the states, and subject to each of their  
15 state rules and regulations. These states do  
16 not relinquish their control of the data when  
17 they provide it to the federal government.  
18 End of comment.

19 A couple questions, just excuse me  
20 if you don't mind. One says, will the  
21 PowerPoint presentation be made available to  
22 the public? The answer is, yes, it will be



1 made available to the public on the web, and  
2 the WebEx presentations will be made available  
3 as well. That was the second question. So,  
4 but back to the floor.

5 MS. SOZER: This is Amanda Sozer  
6 again, and I wanted, I got the answer to the  
7 question that I asked Cathy. She wasn't able  
8 to send a comment in. A few states -- so the  
9 bottom line is there's no other place that our  
10 forensic genealogists can get this information  
11 from. There are a few states that have open  
12 records, open death records, but again, as Mr.  
13 Moss pointed out, when you're doing this  
14 research, knowing additional information, such  
15 as where did someone apply for their social  
16 security number, or where did they die, gives  
17 our researchers information on where to look.

18 So, for example, if someone died  
19 in Florida, but they applied for their Social  
20 Security Number in Michigan, and the soldier  
21 grew up in Michigan, there's a likelihood that  
22 there's a link there. So it's all of that

1 information, and then that's assimilated by  
2 the genealogist to try to locate these  
3 individuals. So I, hopefully I've answered  
4 your question. Thank you.

5 MR. HAGEN: Thank you. I have a  
6 question for the genealogist types, if you  
7 don't mind. I have a question on use, versus  
8 disclosing. Is it possible for the  
9 organizations to use content, versus disclose  
10 content? In other words, matching services  
11 which we've hear referenced several times in  
12 this discussion this morning, in many ways  
13 just use it for matching, and as coming from  
14 an external number, or an external identifier,  
15 matches against this and doesn't really touch  
16 or use the content, but it matches against it.  
17 Can you comment on this use versus disclose  
18 question?

19 MR. MOSS: I can, and it's in the  
20 context of our forensic genealogist  
21 interacting with courts. And we frequently  
22 have that in test state proceedings. We have

1 it in land title cases. We have it probate of  
2 estates. We have it in resolving oil and gas,  
3 mineral interest titles. We have it in right  
4 of way, purchase of right of way if we want to  
5 expand a highway.

6 And every court I've ever appeared  
7 in wants to see the official record  
8 demonstrating that what you are asserting as  
9 a genealogist is documented in vital records,  
10 and so in that context certainly.

11 In the scholarly context you want other  
12 researchers to be able to follow the path that  
13 you followed, and reach their own conclusions  
14 about how good a job you did in arriving at  
15 the genealogical conclusion you are putting  
16 forth. And so it's mere use, mere access, not  
17 being able to document what you have concluded  
18 undermines the entire process.

19 MR. HAGEN: Thank you.

20 MS. SOZER: Yes, I concur with Mr.  
21 Moss that our genealogists, we supply a report  
22 to the Army so that they can follow the

1 research that was done. So we might say we  
2 found that this person was, died in this  
3 state. And then we would look for the  
4 obituary in that state to look for such people  
5 listed in that obituary. So our sources list  
6 is something that someone else can follow and  
7 independently verify that the research was  
8 done appropriately.

9 MR. HAGEN: Okay, thank you. Sir.

10 MR. FREIMUTH: I also want to make  
11 sure I understood your use versus disclosure.

12 MR. HAGEN: Yes. Thank you.

13 MR. FREIMUTH: Because when a  
14 match is done, we actually would disclose that  
15 information from the SS DMF to the insurance  
16 to the insurance company.

17 MR. HAGEN: I'm sorry, you were  
18 disclosing that you've made a match?

19 MR. FREIMUTH Yes, well a  
20 potential match. And we would -

21 MR. HAGEN: But did you have a SSN  
22 number originally?

1 MR. FREIMUTH: Maybe, maybe not.

2 And so that's the requirement -

3 MR. HAGEN: So that's a

4 disclosure.

5 MR. FREIMUTH: That's a

6 disclosure. That's correct. And one of the

7 questions we would have is, if we disclose

8 that information with the insurance company

9 that we would be providing this information

10 to, need to be certified in order to accept

11 that, and receive that information? And that

12 was posed directly from one of our clients.

13 MR. HAGEN: Thank you.

14 MR. FREIMUTH: Thank you.

15 MR. HAGEN: I have a comment from

16 Jan Alpert, source, I am Chair of the Records

17 Preservation and Access Committee. She wants

18 to make three points. We would not have been

19 closing access to DMF if IRS had been using

20 the DMF and other filters to prevent the

21 fraud. That make sense? Bravo? Okay, I

22 communicated that one okay then. The IRS

1 began using filters in 2012, and the fraud  
2 from the use of the Social Security Number of  
3 the deceased is decreasing further from the 2  
4 percent reported in 2011. Clear? Bravo  
5 again?

6 The DMF is critical to  
7 genealogists who do forensic and other time  
8 sensitive work because it is the only national  
9 index of individuals. By having access to the  
10 name, date, and place of death, and state  
11 where the social security number was issued  
12 can narrow search so death certificate and  
13 obituary can be located. Clear? Other  
14 questions from the floor? I mean, other  
15 comments from the floor?

16 MS. MEYER: Sorry, switching  
17 topics from genealogy to credit again. Fair  
18 credit reporting agencies gather information  
19 about a person's credit file. And they need  
20 this information so that they can prevent  
21 fraud. When someone is making a credit  
22 application the credit granter will often seek

1 information about their credit file, and they  
2 would have a legitimate purpose under the Fair  
3 Credit Reporting Act, and under the, and to  
4 prevent identity theft.

5           However, if they're limited in who  
6 they can give that information to, that might  
7 be issue for the gentleman from the Department  
8 of Commerce, for example, because individual  
9 creditors might not be able to go to the Death  
10 Master File, but may be dependent on getting  
11 credit reporting information from credit  
12 reporting agencies. If they cannot report the  
13 death information, along with the other  
14 information about the credit history of a  
15 particular individual, they would not be  
16 giving accurate credit information and that  
17 would be a huge problem.

18           And the only people who can get  
19 credit reports are people who have permissible  
20 purposes for getting the credit report under  
21 the Fair Credit Reporting Act, and those are  
22 limited by the Fair Credit Reporting Act.

1                   MR. HAGEN: I have a comment from  
2 Chris  
3 Scaramastra. Upon the completion of the  
4 certification process, we would ask that the  
5 SSA DMF go back to a pre-November 2011 status.  
6 We would ask for a full DMF.

7                   MALE PARTICIPANT: Amen. Bravo.

8                   MR. HAGEN: I think I would prefer  
9 someone from the audience explain why we just  
10 said amen, maybe why that's important.

11                  MS. MEYER: This is Robbie Meyer  
12 with the ACLI. And our members have been,  
13 throughout this process, very, very concerned  
14 about the fact that there is so much less  
15 information in the DMF, or the public DMF than  
16 there is in the full file that's available to  
17 government agencies.

18                  Less, of course, less information  
19 that's in the file, you know, the less robust  
20 the analysis of the information would be. And  
21 there is also a concern, as time goes on there  
22 will be a greater and greater difference



1 between the amount of information in the file  
2 that's public and the other file. So, very,  
3 very significant concern of ACLI member  
4 companies.

5 MR. HAGEN: Somewhat out of the  
6 scope of our certification process, but still  
7 critical to the process of the content of the  
8 file. Thank you. I have a question  
9 concerning something that's been mentioned a  
10 few times in this meeting, and that is about  
11 third party distribution, third party access.  
12 Can someone comment on the certification form  
13 that you've seen as a notational form, and  
14 tell me how third party organizations would  
15 work with such a form? Can anybody speak to  
16 that?

17 MR. FEDEROWICZ: I'll try.

18 MR. HAGEN: Try. Give it a shot.

19 MR. FEDEROWICZ: We're like a  
20 third party administrator. We work for big  
21 insurance companies, work for banks, we work  
22 for pension funds. We work for a lot of

1 organizations who look for the services that  
2 we do. We had a similar question to the  
3 government as the other gentlemen, you know,  
4 do we think we should we be certified and then  
5 have our customers certified?

6 And right now the way we work for  
7 - we also do, we also access files that have  
8 to do with address information through  
9 companies like LexisNexis and Accurum. And so  
10 we have to not only be certified that we can  
11 keep this stuff safe, we also have to certify  
12 that our customers have a permissible purpose  
13 to use this data, okay? So we actually go  
14 through a double certification process, and so  
15 I can see where we would require our customers  
16 to certify with us that they have a  
17 permissible purpose, that they're using the  
18 data for the appropriate reasons, following  
19 all the information you've had in your  
20 notational thing.

21 So we do that right now. It's  
22 just a part of our normal course of doing

1 business. I don't think it's onerous. I  
2 think what would be onerous is that if you  
3 said, well, listen, you know, we're going to  
4 come audit you, but we want you to go audit,  
5 you know, your customers. I mean that's a  
6 big, big deal. We're not an audit company,  
7 you know, so I think that's something you'd  
8 have to really, really think about, you know,  
9 how deep you go with your auditing. And so  
10 that's the way it works right now for us.

11 MR. WIXON: Yes, this is Henry  
12 Wixon. Thank you very much, Mr. Federowicz  
13 for that because that's exactly the kind of  
14 information we need. If you look at the  
15 notional certification form, you'll notice  
16 that in certain places rather than reference  
17 a certified person it references the criteria.

18 And so that's not an accident, but  
19 we know that, I mean we need to understand  
20 how, if you were in a position where you had  
21 to establish somehow that the third party, to  
22 whom you gave this information, although not

1 certified, satisfied all those criteria, how  
2 would you do that? How would you demonstrate  
3 to NTIS under such a certification and program  
4 that you had taken care of business in that  
5 respect? Would it be hard? Would it be easy?  
6 Are there things in place? And we need that  
7 from, you know, we'd like to understand that  
8 from everybody out there as we think about how  
9 to put a program together.

10 MR. FEDEROWICZ: Well, part of  
11 what we do, since we're doing business with,  
12 primarily, with insurance companies and  
13 pension plans, we're not doing business with  
14 anything outside of that kind of framework.  
15 We know these organizations have that  
16 permissible use. We don't do business with  
17 individuals. And individual cannot call us  
18 up, or say I would like you to determine  
19 whether this person is dead. We just don't do  
20 that type of thing because it's outside of  
21 that framework and outside that scope. So the  
22 scope of our business dictates that we only do

1 business with businesses that have the same  
2 interest in permissible purposes and use.

3 So if I, you know, signing up a  
4 new insurance company customer, I mean, I know  
5 that they have their regulatory interests.  
6 You know, they have their fiduciary interests.  
7 They want to stop annuity payments from being,  
8 going out the back door, that type of stuff.  
9 So I'm pretty confident when they sign that  
10 form, we have them sign a form, when they sign  
11 that form, that they're legit. I'm not really  
12 worried about it. So, but we do have that  
13 double step process.

14 MR. WIXON: And we appreciate that  
15 from our, you know, our perspective is, you  
16 know, we're several steps away from you. So  
17 the question is, you know, how do we get the  
18 reassurance that, or NTIS get the reassurance  
19 that it will need on their certification  
20 program to understand that you've done your  
21 diligence? You -- and that's what we're  
22 looking for from you and other members of the

1 public is to help us understand that. How it  
2 would work, how it does work.

3 MR. HAGEN: One of the approaches  
4 that could be taken on this is also about the,  
5 Henry's point about the certified user.  
6 There's two parts to that. There's the actual  
7 document itself, and then there's a registry,  
8 of sorts. Registry has to be who's been  
9 approved on that list, and whether that's a  
10 subscriber list or some list that's captured  
11 internally within an organization, it's still  
12 a registry. And where does that registry  
13 reside?

14 In third party situation, does it  
15 reside in the third party, or does it reside  
16 as a central source? There's problems there  
17 in that business information, we don't want to  
18 hold your business information where your  
19 subscribers are. But the thing is, we need to  
20 have clear understanding that you have  
21 certified users. That's a problem.

22 MR. FEDEROWICZ: And, you know,

1 with our relationship with -

2 MR. HAGEN: You have to be at the  
3 mic, I'm sorry.

4 MR. FEDEROWICZ: You know, in our  
5 relationship with our, like LexisNexis, okay?  
6 We maintain a file of all of our certified  
7 individuals, corporations I should say. You  
8 know, we do not give that to them. They can  
9 come in and audit us. They can come and look  
10 through what we're doing, but it's, we  
11 maintain that registry, if that's the kind of

12 -

13 MR. HAGEN: Yes, that's exactly.  
14 Thank you.

15 MS. YOHE: Another scheme to look  
16 at is under HIPAA, healthcare providers are  
17 required to keep health information private.  
18 And when they contract with somebody and they  
19 give that information to that third party,  
20 they have to have a business associate  
21 agreement for that third party. And that  
22 requires the third party to maintain certain

1 practices, and security requirements, and  
2 comply with the HIPAA privacy and security  
3 requirements.

4 And it also requires the business  
5 associate to track any disclosures that they  
6 made of the information so that if the  
7 Secretary of Health and Human Services ever  
8 came to audit they could go down the series  
9 and audit where that information was  
10 disclosed.

11 MR. HAGEN: Thank you.

12 MALE PARTICIPANT: Just to add  
13 what Felix was talking about related to how  
14 would you be able to obtain certification  
15 information for, as Matt spoke about, one of  
16 our client customers that we ran their policy  
17 book of business versus the DMF.

18 In our contracts, contractually,  
19 although we have a list of the insurers that  
20 we do the matches for utilizing the DMF, in  
21 the contracts that we have with our clients it  
22 specifically states the regulation or



1 statutory requirement that our search or match  
2 that's being performed meets for that client  
3 company, the third party. Our, you know, our  
4 client.

5           So, in that context, a little bit  
6 deeper, yes, we have a list of who we do the  
7 matches for, but we also have the reason.  
8 We're contractually bound to meet the New York  
9 Reg 308 for example, to do the matches based  
10 on New York's regulatory requirement, or the  
11 Kentucky statutory requirement in their law  
12 that states what it has to be used to meet  
13 that requirement. So we would have that level  
14 of detail from our client insurers that, why  
15 they're having to perform the matches, in the  
16 way that we're performing them for them. So,  
17 that helps.

18           MR. HAGEN: I have two comments  
19 from WebEx. Robert Perholtz, as pioneer of  
20 the FOIA law that made DMF available in 1979,  
21 it's very unfortunate that the release of the  
22 DMF has not been scrutinized over the years.

1 The ethical, controlled use of an untainted  
2 DMF is paramount.

3 Second comment from Emily  
4 Holubowich, sorry. State laws prohibit the  
5 release of the state reported data in the DMF.  
6 SSA recognized they released state data in  
7 violation of state law and states' contracts  
8 with SSA. They have no authority to release  
9 the data, and it should have never been made  
10 public. And parents, for NAPHSIS representing  
11 state vital records registrars, close parents.  
12 Any further comments? I have one question  
13 more.

14 FEMALE PARTICIPANT: Can you  
15 repeat that?

16 MR. HAGEN: Which one? The last  
17 one? The whole thing? I'll try. For you, I  
18 will do this. I'm sorry. State laws prohibit  
19 the release of state reported data in the DMF.  
20 SSA recognized they released state data in  
21 violation of the state law and states'  
22 contracts with SSA. They have no authority to

1 release the data, and it should have never  
2 been made public, parents for NAPHSIS  
3 representing state vital records registrars.  
4 I think this is the comment coming from Emily,  
5 and my apologies for not identifying her  
6 further. I think she is from NAPHSIS, but I  
7 am not certain. She is, yes? Thank you.

8 One last thing. And I mention  
9 this as the, and this gets from the  
10 certification issue, but it gets more over the  
11 definition of process going forward with the  
12 product, and the product terms and conditions.  
13 I'd mentioned early in the meeting that we are  
14 kind of, we are moving away, we are focusing  
15 on subscriber access only. Is that a problem?

16 MR. MOSS: Yes.

17 MR. HAGEN: Can you elaborate?

18 MR. MOSS: Let me make sure that I  
19 understood what you just said correctly. The  
20 way the genealogical industry operates, for  
21 the most part, is we have providers who are  
22 normally, the way it has operated

1 historically, is we have a number of  
2 enterprises, both for profit and non-profit,  
3 who have historically paid the fees and  
4 purchased the Death Master File. And  
5 regularly update it, they are ongoing  
6 subscribers. They have historically, they  
7 have displayed items that are sensitive to  
8 privacy concerns.

9           And since 2011 they have, for  
10 example, all of the reputable genealogical  
11 sites that I am familiar with have masked the  
12 Social Security Number on all person, on  
13 recently deceased people, for a minimum for  
14 three years. Some have done it for longer,  
15 and made that available to, in the case of the  
16 for profit companies, they have their own  
17 subscriber list. Some lists may be a million,  
18 plus subscribers, members of the general  
19 public. The other, even the non-profit folks  
20 would make it available either to members in  
21 a particular display, or to the general public  
22 with no affiliation with their organization.

1 They would be displaying this information made  
2 broadly available to -

3 MR. HAGEN: Mr. Moss are you  
4 referring, basically, to the new file that's  
5 less than three year old, or more than three  
6 year old file?

7 MR. MOSS: Both.

8 MR. HAGEN: Okay. I just want to  
9 be sure I'm -

10 MR. MOSS: The new file would,  
11 what they would do and what they had to do in  
12 December of 2011 when, in response to  
13 Congressional expression of intent to pass a  
14 draconian piece of legislation basically  
15 abolishing the Death Master File. They  
16 responded to the legitimate concerns. We're,  
17 no one who draws breath can fail to be  
18 outraged by the conduct of identity thieves  
19 that would subject the grieving parents of  
20 children to this kind of, they lose their  
21 child all over again.

22 And anyone who, everyone

1 understands that. Our problem is we've got to  
2 determine where the problem is, and Jan Alpert  
3 and her comments clearly identified where the  
4 problem was. Unaccustomed as I am to praising  
5 the IRS, let me say that 2011, in 2011 they  
6 weren't using any useful filters to identify  
7 potentially fraudulent tax returns. Starting  
8 in December of 2011 they did start using  
9 filters. I don't expect them to report how  
10 they were structured, but I have to surmise  
11 they included in the development of their  
12 filters the Death Master File that would flag  
13 these, that particular kind of case. I expect  
14 that 2 percent number that I highlighted on  
15 the chart to be lower in 2012.

16 It is the only category on that  
17 chart that I expect to be lower, and if the  
18 early indications give us any indication of  
19 what to expect, we could expect living socials  
20 to be abused at twice the rate they were being  
21 abused in 2011. And nothing in this law does  
22 anything to interdict the abuse of living

1 Social Security Numbers.

2 MR. HAGEN: Thank you, sir.

3 MR. MOSS: Right. Forgive my  
4 passion. This has been a two year project,  
5 and for this 74 year old blogger. So -

6 MR. HAGEN: I'm interested in the,  
7 there's a lot of people very passionate about  
8 the Death Master File. Believe it or not,  
9 there's a lot of interest in it. I'm  
10 expecting to hear Don Imus speak up on it  
11 this morning -

12 MR. MOSS: Yes, I'd be surprised.  
13 Everyone who has used it appreciates its  
14 value. And it is the people who haven't used  
15 it who haven't really realized, there's an  
16 unstated assumption that hiding things makes  
17 it better. Obscurity is not security.

18 MR. HAGEN: Thank you, sir. I  
19 have one last comment from Jan Meisels Allen  
20 from the International Association of Jewish  
21 Genealogical Associations. It is critical for  
22 the information to be available as soon as

1 possible, not waiting to three years for  
2 tracing medically inherited diseases, and  
3 going back on the family tree to see if these  
4 diseases, such as breast cancer, BRACA I and  
5 II genes.

6 I'm not sure exactly sure what  
7 that is, or prostate cancer is a familial  
8 issue, to help the living and future  
9 generations take necessary preventative  
10 measures to save lives. Okay, I think without  
11 any other questions from either the -- or  
12 comments from the floor or the front, are we  
13 complete? Everybody saying yes?

14 MR. MOSS: With our thanks for  
15 providing the forum.

16 MR. HAGEN: Well you're welcome,  
17 well thank you before I pass it on to Mr.  
18 Borzino. We have one more comment it looks  
19 like. Go ahead.

20 MS. MEYER: Just a quick question.  
21 Do you all have any flavor yet as to your  
22 timing with respect to your notional form?



1                   MR. HAGEN: I leave that one to  
2 Mr. Wixon.

3                   MR. WIXON: So we are in concerted  
4 discussions with sister agencies right now in  
5 order to advance towards an interim solution,  
6 and that's all I can share with you at this  
7 point.

8                   MS. MEYER: Perfect, thank you.

9                   MR. HAGEN: Sir?

10                  MALE PARTICIPANT: I was hoping to  
11 pick up on the conversation that Henry and I  
12 had. A legitimate purpose -- isn't the fact  
13 that somebody is getting a grant from the  
14 National Science Foundation, the National  
15 Institutes of Health, do you really need to  
16 see the charter of NSF and NIH to make grants?  
17 What are you looking for there?

18                  MR. WIXON: So, we were discussing  
19 during the break the question of what, you  
20 know, in our definition that we have with  
21 respect to a legitimate business, purpose  
22 subject to, you know, law regulation. What

1 laws and regulations, et cetera, would satisfy  
2 that requirement?

3 And so we want to hear from you  
4 about what you think the laws and regulations,  
5 government regulations, et cetera, are that  
6 should satisfy that requirement.

7 We have no preconceived notions  
8 about it, and we're asking you to help us as  
9 we think about, you know, the full notes and  
10 comment rule making process to a final rule  
11 where we might actually address that, or  
12 whether we should address it, those kinds of  
13 things. So whatever you can share with us,  
14 you the public, all of you out there, during  
15 our comment period with respect to that kind  
16 of question will be valuable.

17 MALE PARTICIPANT: Our position  
18 would be that existing law that authorizes a  
19 grant through the National Science Foundation,  
20 or the National Institutes of Health, a  
21 federal contractor, even a government  
22 employee, are clearly legitimate purpose.

1 They're clearly legal.

2 MR. WIXON: Thank you.

3 MALE PARTICIPANT: Okay.

4 MR. WIXON: That's the kind of  
5 thing we need to hear.

6 MR. HAGEN: Well thank you.

7 Before we adjourn I want to say thank you to  
8 all the participants and all the many  
9 participants on the web. And I'll pass this  
10 over to Bruce, to see if there's any, Mr.  
11 Borzino, I am sorry, to see if he has any  
12 further comments.

13 MR. BORZINO: I would just like to  
14 ask you to send us your comments as complete  
15 as you want to make them. I think we would  
16 appreciate them sooner than the 18 March  
17 deadline. I anticipate that some of you have  
18 already started writing those. Certainly,  
19 given our short suspense, trying to, well, the  
20 26th of March is coming fairly quickly. So  
21 the sooner we can have your comments in, and  
22 the sooner we can make them available to our

1       sister agencies and others who might be  
2       interested in them, that would certainly help  
3       our cause.

4                       MR. WIXON: But we want to  
5       emphasize that comments received all the way  
6       to the end of the comment period will be  
7       considered by NTIS going forward.

8                       MR. HAGEN: Thank you.

9                       (Whereupon, the meeting in the  
10       above-entitled matter was concluded.)

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C E R T I F I C A T E

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DATE: 03-04-14

I hereby certify that the attached transcription of pages 1 to 98 inclusive are to the best of my belief and ability a true, accurate, and complete record of the above referenced proceedings as contained on the provided audio recording.

*Neal R Gross*

**NEAL R. GROSS**

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