

**National Association for Public Health Statistics and Information Systems  
(Naphsis) Statement**

The statement on the following pages is in response to the audit, Impact of Undetected Marriages on Social Security Administration Payments, 012317, that was submitted by The National Association for Public Health Statistics and Information Systems (Naphsis) on May 20, 2024 pursuant to Pub. L. No. 117- 263, § 5274. The attached statement does not reflect the findings, conclusions, or opinions of the SSA OIG.

## Naphsis Response

### IMPACT OF UNDETECTED MARRIAGES ON SOCIAL SECURITY ADMINISTRATION PAYMENTS (012317)

**May 19, 2024** – The National Association for Public Health Statistics and Information Systems (Naphsis) is the non-profit national membership organization for Vital Records and Health Statistics (VRHS) offices across the United States (US) and represents the common needs of all 57 in a complex balancing act between administrative and statistical needs. Members of Naphsis include state, territorial and city jurisdictions (50 states, American Samoa, Guam, the Commonwealth of the Northern Marianas Islands, Puerto Rico, US Virgin Islands, New York City, and the District of Columbia). It is important to note that marriage and divorce data are not always categorized as vital records data due to varying jurisdictional laws. It is also important to note that Naphsis does not own or maintain vital records data. The data are owned and maintained by the individual vital records jurisdictions. Naphsis provides systems to support secure data exchange between jurisdictions and with federal data users.

Naphsis appreciates the opportunity to respond to the report issued by OIG regarding improper payments due to marriage. There has not been a national coordinating agency requesting detailed marriage or divorce data since National Centers for Health Statistics (NCHS) stopped collecting the demographic data in January 1996 and instead only collects counts of these events.<sup>1</sup> The last national standard for marriage data was issued in 1989.<sup>2</sup> Due to the lack of federal interest in the collection and maintenance of this data, its accuracy varies across the nation. Even more so due to the varying levels of state collection and maintenance of this data, as some states have counties or more local municipalities delegating what information is pertinent to collect and maintain. Some of this data is not even within the vital records agency's purview and instead sits with the court system due to the legal process for dissolution. Of note, this report only addresses marriage data, yet divorce data is just as imperative to this data lifecycle.

Naphsis understands and supports the agency comments regarding the challenges with the current data landscape, yet also supports the intentions of the office of the inspector general to pursue data matching with states to reduce improper payments. An investment today in a national data standard for marriage data will be beneficial in the long term, especially as the need for accurate marriage data continues to grow. The only way to improve data quality is through long-term continued federal funding of vital records offices and ongoing coordination with the jurisdictions through Naphsis.

Naphsis supports an initiative to determine specific standards related to the collection of marriage and divorce data. The data currently collected has been sufficient to support jurisdictions participating in a marriage verification project specific to name changes for SSA. It would be worth exploring the viability of additional use cases based on this success.

1. Centers for Disease Control and Prevention. (n.d.). **Marriage and divorce**. National Center for Health Statistics. Retrieved May 15, 2024, from <https://www.cdc.gov/nchs/nvss/marriage-divorce.htm#:~:text=Information%20on%20the%20total%20numbers,suspended%20beginning%20in%20January%201996>.
2. National Center for Health Statistics. (2000). **Vital statistics of the United States: Marriage, divorce, and remarriage** (DHHS Publication No. (PHS) 2000-1120). Centers for Disease Control and Prevention. Retrieved May 15, 2024, from [https://www.cdc.gov/nchs/data/misc/hb\\_marr.pdf](https://www.cdc.gov/nchs/data/misc/hb_marr.pdf).

## Corrections

Footnote 16 on page 4 incorrectly states “Naphsis maintains vital record data” when it is Naphsis members, the vital records offices, who maintain vital record data for our nation. Naphsis is the membership association for vital records offices and their employees, and at the request of our members, Naphsis maintains systems that connect the federated system of vital records data, but Naphsis does not maintain the data itself. There is also a typo in the word States on this footnote.

Current:

<sup>16</sup> NAPHSIS maintains vital record data—such as birth, death, and marriage—in the United States.

Correction:

<sup>16</sup> Naphsis’ members maintain vital record data—such as birth, death, and in some cases, marriage—in the United States.

The second paragraph on page 9 incorrectly identifies ‘NAPHSIS marriage data,’ insinuating that the data belongs to Naphsis, but Naphsis does not own or maintain any vital records data, its members do. Not all jurisdictions’ vital records offices have ownership over the marriage or divorce data, there are additional data stewards.

Current:

SSA stated it explored the feasibility of using the NAPHSIS marriage data to determine if OASDI beneficiaries had a change in their marital status.

Correction:

SSA stated it explored the feasibility of using the marriage data from the Naphsis member jurisdictions to determine if OASDI beneficiaries had a change in their marital status.

Naphsis has onboarded an additional 4 jurisdictions, so footnote 15 could be updated with the new jurisdiction participants:

Current:

<sup>15</sup> In April 2022, SSA added a new feature to iSSNRC that enables applicants to request an SSN name change replacement card due to marriage. The capability was only available to users in Arkansas. Since then, SSA has expanded this. As of February 2024, the 17 states participating in iSSNRC were: Arkansas, Colorado, Georgia, Idaho, Kentucky, Maine, Maryland, Michigan, Missouri, Montana, Nebraska, North Dakota, Rhode Island, South Dakota, Virginia, Wisconsin, and Wyoming. SSA, POMS, RM 10205.630 (February 16, 2024).

Update:

<sup>15</sup> In April 2022, SSA added a new feature to iSSNRC that enables applicants to request an SSN name change replacement card due to marriage. The capability was only available to users in Arkansas. Since then, SSA has expanded this. As of May 2024, the 20 states participating in iSSNRC were: Arkansas, Colorado, Delaware, Georgia, Hawaii, Iowa, Idaho, Kentucky, Maine, Maryland, Michigan, Missouri, Montana, Nebraska, North Dakota, Rhode Island, South Dakota, Virginia, Wisconsin, and Wyoming. SSA, POMS, RM 10205.630 (February 16, 2024).

## CONCLUSIONS

Naphsis provides systems on behalf of the nation’s vital records offices and continues to evolve their systems for modernization efforts in the public health sector that align with our member agency needs. Collaborative efforts regarding data standards for marriage data could bring the data’s quality to a place it needs to be to help reduce improper payments due to a change in marital status.