



**COUNCIL OF PROFESSIONAL ASSOCIATIONS ON FEDERAL STATISTICS**  
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**TO:** National Technical Information Service

**FROM:** Katherine R. Smith, Executive Director  
Council of Professional Associations on Federal Statistics (COPAFS)

**SUBJECT:** Proposed Rule on Certification Program for Access to the Death Master File (DMF)  
Docket ID: DOC-2014-000

We commend the Department of Commerce on its attempts to create more open access to DMF files for legitimate purposes, but find troubling the lack of specification that federal program evaluation and related research are legitimate purposes.

COPAFS members are professional organizations and other entities representing over 300,000 people that rely on timely and accessible federal statistics to inform program decisions or to conduct research and public program evaluation.

Timely information on death is critical to the evaluation of numerous programs and policies, including the Affordable Care Act. Indeed, it is impossible to assess the impacts on mortality of various factors beyond health insurance, including education, enrollment in federal programs, or quality of health care, in real time without access to an up to date DMF.

Also, two highly influential surveys that follow individuals or households over time are used by social and health scientists and rely on DMF data. The Health and Retirement Study (HRS) and the Panel Study of Income Dynamics (PSID, funded by the National Institutes of Health and National Science Foundation, permit assessment of relationships among numerous factors. DMF data are needed to confirm the death of study participants. There is no good alternative source of current information on mortality available to these researchers.

For these reasons, we would like to see the Rule (Section 11) revised to make clear that federal scientists, grantees, and contractors would also be eligible for the certification process as long as they meet the standards for safeguarding the DMF data. This would resolve current ambiguity in the Rule and assure that access to the files is open to those who do research on and evaluate federal programs.

Thank you for the opportunity to comment on the draft rule. Please feel free to contact me if you have any questions or would like additional information.