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National Committee on Vital and Health Statistics

Hearing on Next Generation Vital Statistics

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Written Testimony to Support the Presentation of

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Representing the National Funeral Directors Association

Thank you for this opportunity to present testimony on the critical role that funeral directors play in the vital statistics system. As a funeral director who witnessed the initial change over from paper death certificates to our current electronic death registration system, I know how important it is to stay current and up to date with available technology. I sincerely thank the NCVHS for hosting this hearing and being open to a transition forward within the vital statistics environment.

Funeral directors are primarily a part of the death certificate component of the vital statistics system. We are the conduit between the public and a jurisdiction's EDRS system. We gather and input the necessary data into the EDRS system to complete the parts of the death certificate that are required, other than the doctor and registrar sections.

The Death Certificate process is similar in most jurisdictions, however, variations in information required and filing processes are based on local requirements, rules or statutes, that can cause variations to parts of that process or the information requested.

With that in mind, let me present a typical New Jersey case work flow from time of death to completion of the filing of the Death Certificate, as asked in question one.

Question 1. Where does the funeral director role fit into the overall vital statistics system process? What is the workflow of that process at a high level?

1. Death event happens
2. EDRS case is initiated
 - a. Most often by health care facility staff (Hospital, Hospice or Nursing Center), if attended
 - b. Sometimes by Medical Examiner/Coroner, if unattended, accident or homicide
 - c. Sometimes by funeral director (house death without hospice but attending physician on record)
3. Separate Sections of the EDRS case need to be completed
 - a. Statistical data about deceased by funeral director
 - b. Medical data by pronouncing and/or certifying doctor
 - c. Registrar section about where case is filed within what jurisdiction
4. Funeral Directors then conduct an arrangement conference with Next of Kin/Responsible Party
 - a. Gather the statistical data needed for the Death Certificate
 - i. Date of Birth, Place of Birth, Social Security number, Parents' names, education level, last place of employment and type of business, military history, marital status, informant's information, etc. (again, this will vary as mentioned above)
 - b. Explain the need for certified copies of the death certificate to the family
 - i. Insurance, public assistance funds, transfer of assets, etc.
 - c. Determine the number of copies of the Death Certificate the family would like, if any
5. Then log into the EDRS system as a user to
 - a. Input statistical information as gathered from the Next of Kin/Responsible Party
6. Notify the Certifying Physician if the case has not been completed by them already (needs to be done within 24 hours from time of death in NJ, but varies by jurisdiction).

- a. Send an email through EDRS system
 - b. Make a phone call to office as well
 - c. Wait to obtain an email notification after the Doctor has completed their section
7. Then we log back into the case to
- a. Send the case to appropriate registrar for filing and acceptance
 - b. Print the required burial/cremation/transit permit to complete requested disposition of deceased
 - c. Order desired certified copies of Death Certificate if necessary that can be
 - i. Picked up at our local registrar
 - ii. Mailed to family from the State of NJ
8. Utilization of EDRS for that case is then complete from funeral director's perspective
- a. Costs of Death Certificates and/or disposition permit reimbursed to the funeral home by Next of Kin after being electronically paid by funeral home at time of filing

Question 2. How does data sharing and transmission work?

As each party inputs their sections for the Death Certificate, the document is shared over the EDRS system electronically on the web. The only paper product produced is the disposition permit for the funeral director and eventually the certified copies of the Death Certificate for the family.

Question 3. How are data protected?

Data is protected by the overall integrity of the EDRS system. Each funeral director who uses the system has his/her own log-in including a user name and password. The password must be updated every 90 days. Individual users are associated with a specific funeral home so other funeral directors at the same firm can update cases. Each case stays within the funeral homes' registered funeral directors. Some jurisdictions have finger print or facial recognition log-ins.

Question 4. How are privacy and confidentiality issues addressed?

Privacy policies are established to protect the records and access to them within our own businesses.

Question 5. How are the data used and by whom?

Once again, we do not use the electronic death data after the case is filed into the EDRS. We use the data we collect ourselves internally for our funeral home case management systems.

The following discussion points speak to current challenges in today's EDRS environment and what could be workable solutions to some of those challenges.

Question 1. What are the current challenges and barriers regarding the vital statistics program?

1. Out-of-state doctors needing access to a jurisdiction's system, if not registered users. This can be a problem for funeral directors near state lines or with a major city nearby that has specialty hospitals.
2. Out of state deaths: we need a different in-state funeral director to complete the case for us.
3. Keeping existing EDRS systems up to date across different web browsers and future updates of those browsers and being able to use different devices with the system (computer, tablet, phone, etc.)
4. Fetal death registration and the ability to make corrections on all Death Certificates.
5. Power outage planning and backup systems.

6. Integration with funeral home case management software to eliminate the need to enter all data twice.
7. Lack of acknowledgement from Social Security that they have received the death notification.

Question 2. What are potential solutions to these challenges listed above?

1. One-time login access for occasional users
2. National or regional death certificate, larger database of EDRS users across many jurisdictions
3. Better and more consistent updates to the EDRS system
4. Again, better and more consistent updates to the EDRS system
5. Communication with stakeholders about the process, when needed or updated (National and state Funeral Director associations would be very useful)
6. Open sourced or cloud based programming, so private software developers can integrate their programming with the EDRS system to easily populate EDRS from case management products. The need to re-enter data that is already contained in one electronic system into another is a large problem that needs attention.
7. Some type of electronic response that a notification was received.

Question 3. What needs to happen?

1. Consistent funding for updates and expansion; data or system user fees, permit fees, Death Certificate fees or jurisdictional budgeting.
2. Research at the national level, rather than state by state adoption and updates.
 - a. Happening now by the CMS Alliance to Modernize Healthcare (CAMH), a Federally Funded Research and Development Center operated by the MITRE Corporation. The National Center for Health Statistics (NCHS) has engaged CAMH to modernize the National Vital Statistics System, and they are working on a Next Generation EDRS system as part of the project.

Thank you again for giving me this opportunity to represent funeral service and the members of the National Funeral Directors Association. I hope that I clearly explained our participation within the vital records system and, at the same time, reminded you that each jurisdiction can have its own variations. NFDA staff and members are ready to continue to partner with you to move this important national initiative forward in any way we might be needed.