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WHITE PAPER:
SEARCHING PLAN RECORDS FOR DECEASED PARTICIPANTS

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This White Paper follows up on previous deceased participant work within the Office of the Inspector General (OIG). It focuses on the Social Security Administration’s (SSA) Full Death Master File (Full DMF) and the advantage it gives in identifying questionable participant records before overpayments occur. It also considers what a pension plan does to resolve deaths in its plan census. It touches on why a pension plan might weigh the treatment of retiree records differently than other participant records. It concludes with a brief discussion of why a plan might have an otherwise acceptable process, that nonetheless may not be a reliable practice for Pension Benefit Guaranty Corporation (PBGC) to assume as proof that deceased participants have been purged from a plan census.

EXECUTIVE SUMMARY: PBGC is one of ten federal benefit paying agencies granted access to the Social Security Administration’s Full Death Master File (DMF), which is the largest, most accurate single repository of deceased records in the United States. Consequently, PBGC has access to a trustworthy tool to assist preventing overpayments in its programs.

Background.....2
Discussion.....2
Conclusion.....8
Appendix:
Understanding the Social Security Administration’s Death Master File.....9

Background

In March 2018, we released a White Paper that described PBGC's efforts to ensure the accuracy of its insurance programs' benefit payments using the Social Security Administration's (SSA) Full Death Master File (Full DMF).¹ We reviewed PBGC's death match program, noting strengths and limitations of relying on the Full DMF as the only tool to prevent the overpayment of insurance benefits to the account of deceased participants.

At the time of the 2018 White Paper, PBGC's primary concern was accurately paying guaranteed benefits under its Single Employer Plan Insurance Program and correctly funding financial assistance under its Multiemployer Plan Insurance Program. Since then, Congress has enacted the American Rescue Plan Act of 2021 (ARP). ARP provides for PBGC to distribute from general taxpayer revenue Special Financial Assistance (SFA) in a single sum to the approved plans. PBGC has now distributed over \$47.4 billion in taxpayer money to approved multiemployer plans² – compared to about \$2 billion that PBGC paid out to multiemployer plans and their participants from its insurance programs over the entire 48-year existence of PBGC. PBGC estimates it will distribute another \$30 billion in SFA over the next two years.

Recently, we issued an evaluation report to determine whether PBGC had taken reasonable steps to ensure that deceased terminated vested participants were not included in the computation of the SFA.³ For the limited number of plans that we evaluated, we compared the most recent census data PBGC maintained for the plans financial assistance through the Multiemployer program to the Full DMF and found that plans had potentially included deceased participants in their request for SFA payments. As a result of this evaluation, PBGC agreed to amend its procedures to require that SFA applicants provide the census data in addition to the applicant completing a search to remove deceased participants. PBGC will use that census data to perform an independent death search.

Discussion

What is the Full DMF and who can use it?

State and local health departments are responsible for the registration, processing, and reporting (when appropriate) of all vital events such as births and deaths. These vital records are legal documents governed by federal, local, and state laws. In many instances, these laws prevent either the public or commercial vendors from having direct access to the most current records. However, SSA contracts with the vital records

offices to receive and maintain death data for the purpose of administering its programs.⁴

State Vital Records are the Gold Standard

“The 57 vital records jurisdictions, not the federal government, have legal authority for the registration of these records, which are thus governed under state laws.”

“It is important to note that the death records that the vital records jurisdictions share with SSA are not released publicly...”

Source: NAPHSIS Written Testimony to the US Senate Committee on Homeland Security & Governmental Affairs, March 15, 2017, pages 1 and 2.

<https://www.naphsis.org/post/2017/03/15/naphsis-provides-written-testimony-to-the-us-senate-committee-on-homeland-security-govern>⁴

Federal law permits SSA to share its accumulation of these death records with a small number of qualifying federal agencies. There are ten federal benefit paying agencies qualified to receive the Full DMF.⁶ PBGC is one of those permitted federal agencies.

The commercial vendors on which many plans rely for death matching, do not have access to the Full DMF. Generally, these commercial vendors work with proprietary information they have developed that uses a combination of obituary searches, direct contact with localities, and sometimes contact tracing. A plan's level of service all depends on how much the plan is willing to spend. The commercial vendors do their work in combination with publicly available, limited access death files. These “Limited Access Death Files” contain death records that are considered public, and the National Technical Institute of Standards (NTIS) is the contact agency.

The Appendix provides a detailed explanation of the sources of Full DMF information and discuss the differences between the Full DMF and the Limited Access Death File.

Why are precise records of deceased participants important to a plan?

Cleaning up pension records through a continuous check for deaths among the payee population is sometimes called a death audit or death auditing. It is one aspect of keeping an accurate plan census and preventing overpayments. But keeping an

accurate plan census is more than preventing overpayments to deceased participants. For example, plan sponsors and administrators, rely on accurate plan records to --

- Decide the contribution level to fund the expected benefits owed to current and future retirees in ongoing pension plans.
- Determine the annual insurance premium to pay PBGC.
- Find participants who have passed the plan's normal retirement age and have not requested the benefit that they earned.
- Settle any remaining payments with entitled survivors or beneficiaries of a deceased participant.
- Meet any Internal Revenue Service minimum distribution rules, which may require payment of a tax on the benefit the plan has not distributed as of the mandatory distribution age.^{7 8}

The work to accomplish the above tasks falls under the general heading of resolving missing participants and a death audit is one aspect of that work.^{9 10} The Department of Labor (DOL) guidance suggests that plans and plan sponsors should regularly try to contact participants that are listed on the plan rolls. If the participant does not respond, DOL suggests as a best practice, at least regarding participants who should be in pay status, is that a plan do a death search: "*If participants are nonresponsive over a period of time, [use] death searches (e.g., Social Security Death Index) as a check and, to the extent such search confirms a participant's death, redirecting communications to beneficiaries.*"¹¹ Plan administrators routinely take this step using one or more of the commercially available services.

What does a plan do to identify deceased participants?

As mentioned earlier, pension plan administrators do not have access to the Full DMF. To better understand a plan's process for managing its population census -- especially when identifying deceased participants and preventing overpayments -- we interviewed professional trustees and administrators. We also reached out to the largest commercial vendors who provide death auditing services to plans.

Plan professionals

Plan professionals detailed their experience with death audits of participants in pay status. All individuals interviewed stated that while the commercial vendor death matching services are useful in identifying deceased participants, there are some

limitations. For example, one plan administrator stated that they take additional measures to validate the results from the commercial vendor's death match. These validation measures include independent searches of online obituary websites, paying the commercial vendor for additional searches and/or a valid death certificate, or mailing a Life Verification request asking the participant to submit a notarized Living Affidavit. Validating the death is typically required before stopping payments.

Using the commercial vendor death matching services in combination with additional validation measures, our selected interviewees asserted a match rate of 85 percent to 97 percent. However, interviewees noted that the death match rate is highly variable, fluctuates with the commercial vendor's access to alternate death records, and apply only to the individuals in pay status.

Additionally, the asserted success rate may differ if the pension population is divided into those in pay status (that is, retirees) and those participants not currently earning or receiving a benefit (terminated vested participants). The described death match process for these terminated vested individuals can be significantly different, and the match rates noted above do not apply. The administrator and trustee representatives we interviewed stated that terminated vested participants are typically excluded from the routine and/or continuous death matching services purchased from commercial vendors.

None of the individuals we interviewed could provide any anecdotal data for a commercial vendor's death match success rate for participants that are not in pay status.

Commercial vendors

To learn more about commercial death match services and methodologies, we reached out to three leading commercial vendors. Given the relatively low number of deaths provided in the Limited Access Death File data from NTIS, commercial vendors rely on alternate data sources including obituary websites, probate court records, customer lists, and data exchanges. Commercial vendors reportedly access 26,000 data sources and 84 billion alternate records in their computer matching processes. Although there are some differences

The number of deaths listed in the Limited Access Death Files that NTIS sells is decreasing because it only contains non-state reported death data.

“...in FY2019, approximately 5 percent of the 2.9 million death reports posted to SSA's records came from non-state sources.”

Source: National Academy of Public Administration for the Social Security Administration, A Report to Congress on Sources of and Access to State Death Data, July 2022, page 57.

in each commercial vendor's methodology and the data science tools used, each commercial vendor reported the capability of identifying individual deaths and providing lists of potentially deceased individuals to an organization.

Commercial vendors offer these death match services for a fee. Based on our discussions, we found that the likelihood of a commercial vendor finding a match is dependent upon several factors, including:

- Location of the death. Death data sharing restrictions and processes vary state by state. Therefore, if the death occurs in a state with more open access laws, then it is more likely the commercial vendor will find a match. However, we note that most states have closed access, and there are restrictions placed for requesting access in open access states.¹²
- Data Quality. Accurate customer census data, such as full name, mother's maiden name, date of birth, place of birth, and current address improve the possibility of finding a match.
- Frequency. Commercial vendors will, at the discretion of the customer, conduct match services ranging from a one-time match performed at specified intervals (such as annually or quarterly) to continuous monitoring via a website portal.
- Service Level and Cost. Some commercial vendors offer different levels of service, each with different costs and different death match rates. For example, one vendor has three levels of service. The least expensive and lowest service level is one-time matching performed using NTIS's Limited Access Death File. The next level service, offered at an increased cost, includes one-time matching performed using additional death databases. This mid-level service will generate a list of possible matches and advise the customer on their next steps to validate the list of matches. The highest and most expensive level includes continuous monitoring using Artificial Intelligence tools against a larger set of death databases.

The commercial vendors report death match success rates ranging between 25 percent and 95 percent, depending upon several factors. In most cases, the customer directly influences the death match success rate. For example, the accuracy of the customer's participant data (or accurate census records in the case of multiemployer plans), the frequency, and the service level purchased, will influence the likelihood of finding deceased individuals.

What steps does PBGC take to correct deceased participant records?

PBGC uses the Full DMF in various situations. When used, the Full DMF reduces the need for the recovery or recoupment of overpayments to participants and pension plans because PBGC can discover deceased participants either before payment or shortly thereafter.¹³

Single Employer Plan Insurance Program Payments

Before it issues a monthly payment under the Single Employer Insurance program, PBGC completes a multistep process to identify and remove deceased participants from the plan census. On a weekly basis, PBGC uploads the latest Full DMF. PBGC then compares its latest iteration of the Full DMF it has uploaded to its current payee list. If a match is found, PBGC uploads the date of death in the participant records and takes steps to stop future payments and recover any overpayments.

Multiemployer Plan Traditional Financial Assistance Payments¹⁴

Traditional financial assistance is paid directly to insolvent multiemployer pension plans.¹⁵ The payment interval varies but, in most instances, it occurs monthly or quarterly. PBGC provides the plan with the money it requested for an upcoming benefit payment period and the plan in turn pays it out to the entitled participants and beneficiaries. Traditional financial assistance is a loan, requiring the plan to sign one or more obligatory promissory notes and give PBGC a security interest in any assets it has or may acquire.¹⁶

PBGC does not directly pay the participants and beneficiaries in an insolvent multiemployer plan requesting traditional financial assistance. But PBGC's auditors evaluate the insolvent plan's requested financial assistance amounts by reconciling the list of payees for the period with the plan census established when the plan initially requested money. Further, as the plan adds new payees each month, PBGC staff verify that those individuals either appear on the list of deferred vested participants or have a direct connection to that person (that is, a survivor, beneficiary, or alternate payee). This verification step includes matching against the current, updated Full DMF, and referring discrepancies back to the plan administrator to research.

Multiemployer SFA payments

Like traditional financial assistance, PBGC pays SFA to the plan, not the individuals. PBGC's efforts to assure itself that an SFA request does not include

projected payments for deceased individuals continue to evolve. As of May 26, 2023, a plan requesting SFA demonstrates to PBGC that it has excluded deceased participants -- and thus is basing its SFA request on a census that is clean of unentitled participants -- by including in its request:

Documentation of a death audit to identify deceased participants that was completed on the census data used for SFA purposes, including identification of the service provider conducting the audit and a copy of the results of the audit provided to the plan administrator by the service provider. If any known deaths occurred before the date of the census data used for SFA purposes, provide a statement certifying these deaths were reflected for SFA calculation purposes.^{17 18}

In partial response to issues that we raised, PBGC has indicated that, on or before July 31, 2023, it intends, on a going forward basis, to request the plan census that underlies an SFA request and it “*will perform an independent death search on the census file. If any additional deceased participants are identified, PBGC will quantify the impact on the amount of SFA requested and take action as needed.*”¹⁹ Our understanding is that PBGC will use the Full DMF as that independent research.

Conclusion

Fortunately, PBGC has access to the Full DMF, which includes over 90 percent of all deaths in the United States and is a reliable means for benefit paying agencies to prevent overpayment of federal funds. Given the lower reliability of private company’s death audit results, we continue to encourage PBGC to utilize their computer death matching program, via the Full DMF, whenever PBGC is approving or paying funds.

Appendix: Understanding the Social Security Administration's Death Master File

Death Reporting Process in the United States

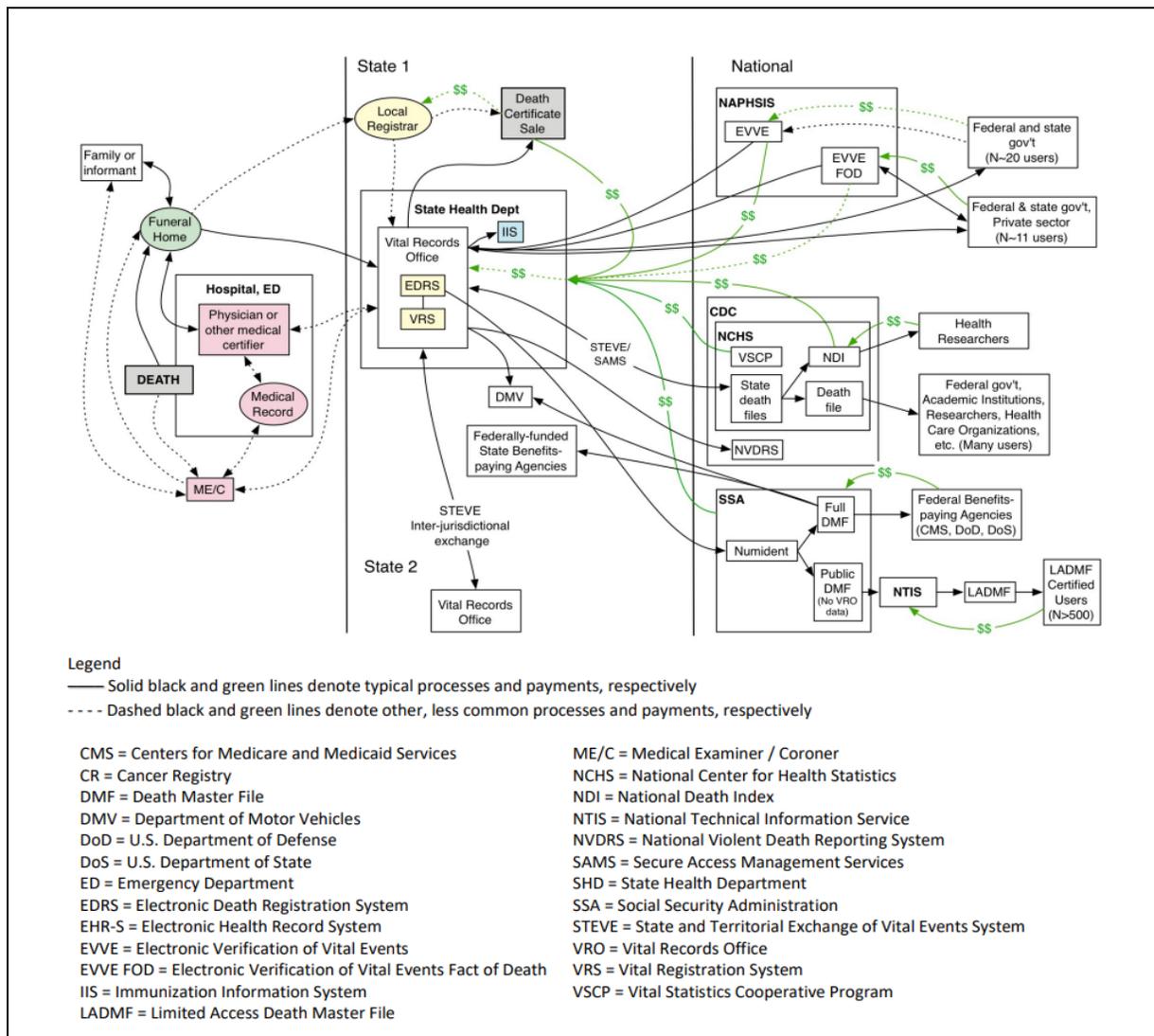
Vital records such as birth and deaths are private, and protected by federal, state, and local laws. Release of identifying information such as name, date of birth, place of birth, date of death, social security number, and cause of death varies depending upon the myriad of privacy and other laws. Therefore, release and sharing detailed death data is restricted. While there are multiple ways that a death can be reported, if the death information is included or reported to a Vital Records Office, then the release of that information is restricted. If the data is reported outside of the Vital Records Office, then the information is considered public, and might be released depending upon factors such as the date of death and the organization requesting the information.

Based on the information available as of this White Paper, approximately 93 percent of all deaths in the United States are reported via the Vital Records Offices and are loaded into the SSA's Full Death Master File. Federal and state law considers the SSA's Full Death Master File as private, and the data from this file can only be shared with federal benefits paying agencies. PBGC is one of these federal agencies with access to SSA's Full Death Master File and it uses this file as the primary tool to complete Single Employer Death Matching Services.

Vital Records Offices and Protected Death Data

Vital Records Offices are government agencies within a state, local, or territorial jurisdiction that are responsible for registering vital events, storing, and protecting vital records, and providing verification of events for legal and administrative purposes. As such, the distribution and sharing of death records with external organizations is restricted. Figure 1 is an excerpt from a National Committee on Vital Health and Statistics Subcommittee on Population Health Report and provides an overview of the death registration process as of 2018: the left panel outlines the registration processes, the middle panel the state processes, and the right panel identifies national agencies that compile, use, and distribute records. The Vital Records Offices report deaths to two federal government agencies: Centers for Disease Control and SSA.²⁰ The death data provided to, and managed by SSA, is the most prevalent used by federal benefit paying agencies to prevent overpayments to deceased individuals.

Figure 1: Death Registration and Reporting



Source: National Committee on Vital Health and Statistics Subcommittee on Population Health, "Vital Records and Vital Statistics in the United States: Uses, Users, Systems, and Sources of Revenue," January 10, 2018, page 8.

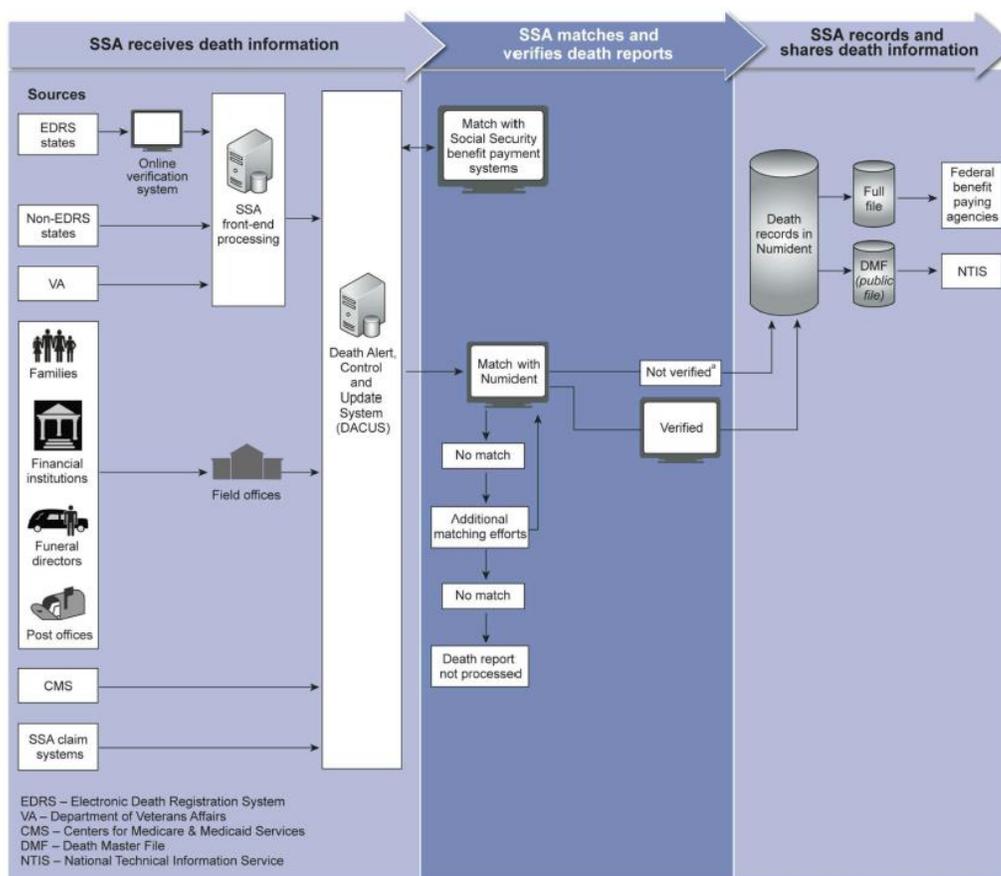
Social Security Administration's Death Data Files

The privacy, protection, and releasability of death data reported to SSA is dependent upon the original source that reported the death. If the Vital Records Office reports the death and SSA verifies the death, the data is entered into the SSA's Full Death Master File. SSA's ability to share or release the Full Death Master File has limited availability and PBGC is one of the federal agencies that SSA can receive and use the Full Death Master File.

If the death is reported externally (not through the Vital Records Office) and is considered a public record, and SSA enters this death data into the Public Death Master File. The privacy rules allow organizations with a specific need to obtain the public death data.

Figure 2 is from a U. S. Government Accountability Office Report and presents an overview of the 2013 processing of reported deaths.²¹ The left column outlines several ways that SSA is notified of a death, the center column highlights the verification process, and the right column denotes two different files that store death.

Figure 2: SSA Death Reporting Process



Source: GAO Audit Report “Social Security Death Data: Additional Action Needed to Address Data Errors and Federal Agency Access,” November 2013, GAO-14-46, page 9

As noted in Figure 2, the method of reporting, the verification process, and the laws and regulations for protecting and releasing the death data, govern the file in which SSA stores and shares the death files.

- SSA Full Death Master File (DMF). This file includes deaths reported via the Vital Records Offices and deaths reported by other processes, which SSA has verified. Per statutory requirements, SSA can only share the Full Death Master File with certain federal benefit paying agencies, and PBGC is one of the federal agencies that receives the Full Death Master File.
- SSA Public and Limited Access Death Files. Two files make up the public death data:
 - SSA Public File. Deaths that were not reported via the Vital Records Office and/or were not verified by SSA are considered public and are stored in the Public File. There is a three year “hold” on the deaths listed in the Public File. This means that the Public File includes deaths with a date of death more than three years prior to the date of the request. Organizations may request access to the Public File by contacting the National Technical Institute of Standards, who manage requests for the Public File.
 - Limited Access Death File. This file includes all public deaths, including those that occurred in the prior three years. Access to this file is also managed by the National Technical Institute of Standards and applicants must complete a certification process to ensure that the requesting organization meets all criteria, such as a specific need for the data, and has adequate measures in place to protect the data. For example, a Teacher’s Union that wants to prevent overpayment of benefits to deceased individuals could apply for access to the Limited Access Death File by contacting the National Technical Institute of Standards.

Social Security Administration’s Full Death Master File

The SSA’s Full Death Master File is considered the most complete and accurate single data base for deaths in the United States. In FY 2021, SSA received 92 percent of the total death reports from the Vital Records Offices via the Electronic Death Registration System.²² The National Academy of Public Administration predicts that the portion of deaths reported via the Vital Records Offices will continue to grow with increased use of the Electronic Death Registration System.²³ Therefore, the deaths reported and stored in SSA’s Full Death Master File will continue to increase beyond the 92 percent, while the public deaths listed in the Public File and Limited Access Death File will shrink by an equal amount.

Social Security's Full Death Master File Increases

PBGC is authorized to access SSA's Full Death Master File. PBGC conducts a computer death matching program to compare participants in pay status to date of death in SSA's Full Death Master File. On average, PBGC finds approximately two percent of the single employer payees are deceased, and initiates action to stop payments.

Since our 2018 White Paper, the quality and quantity of deaths listed in the Full DMF data continues to improve. To test this in the aggregate, we reviewed available data and found that the Full DMF has made considerable strides, most likely due to the increased use of the Electronic Death Registration System. In Table 1, we collected data from an SSA OIG report to identify the annual number of deaths reported to SSA via the EDR and compared those to the total number of deaths listed in the Census for the same period of time. Based on this comparison, the SSA Full Death Master File grew from approximately 80 percent of the total deaths in 2016 to 93 percent of the deaths in 2019.

Table 1: Percent Deaths Reported in SSA's Full Death Master File by Year.

Year	EDR Deaths Reported	Census: Total Deaths	Percent Deaths in SSA Full DMF
2016	2,179,343	2,744,248	79.41%
2017	2,477,293	2,813,503	88.05 %
2018	2,609,935	2,839,205	91.92 %
2019	2,662,265	2,851,838	93.35%

Source: Compiled by PBGC OIG. EDR Deaths Reported - data from SSA OIG's report "SSA's Rejection of State Electronic Death Registration Reports", A-08-18-50499, September 2020, page B-1. Census - Total Deaths column data is from the Census.

The figures calculated in Table 1 align with reports. For example, the National Academy of Public Administration reported that in FY 2021, SSA received 92 percent of the total death reports from the Vital Records Offices via the Electronic Death Registration System and predicts that the portion of state reported deaths will continue to grow as more states submit death data through the Electronic Death Registration System. Therefore, the percentage of deaths reported and stored in the SSA's Full Death Master File will continue to increase, making the Full Death Master File the largest, single repository of deceased records in the United States.

Disclaimer

This white paper contains research and promising practices from other organizations. It is intended solely to provide risk information, promote effectiveness, and provide leadership to detect and prevent fraud and improper payments. It is not an audit performed under Government Auditing Standards; and not an inspection, evaluation, or review performed under CIGIE Quality Standards for Inspection and Evaluation.

¹ Pension Benefit Guaranty PBGC Office of Inspector General, *White Paper: Detecting Fraud and Improper Payments Involving Deceased Participants*, March 9, 2018. [WHITE PAPER: DETECTING FRAUD AND IMPROPER PAYMENTS INVOLVING DECEASED PARTICIPANTS \(MARCH 9, 2018\)](#).

² In our White Paper signed on June 12, we reported that PBGC had distributed over \$55 billion in taxpayer money to approved multiemployer. However, PBGC self-reported distributing \$47.4 billion as of June 16, 2023. Therefore, on June 20, 2023, this white paper was revised to reflect PBGC's reported distribution of \$47.4 billion to approved multiemployer plans.

³ Pension Benefit Guaranty PBGC Office of Inspector General, *PBGC Should Exclude Deceased Terminated Vested Participants from Special Financial Assistance Calculation Report*, March 22, 2023. [PBGC SHOULD EXCLUDE DECEASED TERMINATED VESTED PARTICIPANTS FROM SPECIAL FINANCIAL ASSISTANCE CALCULATIONS REPORT \(No. EVAL-2023-05 March 22, 2023\)](#).

⁴ National Association for Public Health Statistics and Information Systems, *Written Testimony to the US Senate Committee on Homeland Security and Governmental Affairs*, March 15, 2017. <https://www.naphsis.org/post/2017/03/15/naphsis-provides-written-testimony-to-the-us-senate-committee-on-homeland-security-govern>

⁵ National Association for Public Health Statistics and Information Systems, *Written Testimony to the US Senate Committee on Homeland Security and Governmental Affairs*, March 15, 2017, 1-2. <https://www.naphsis.org/post/2017/03/15/naphsis-provides-written-testimony-to-the-us-senate-committee-on-homeland-security-govern>

⁶ Congressional Research Service, *The Social Security Administration's Death Data: In Brief*, January 11, 2021, page 4.

⁷ Best Practice for Pension Administration, *Fiduciary Responsibility: Wanted Dead or Alive*, July, 2017. [Milliman: DB Digest July 2017](#).

⁸ Bolton Insight, *The Value of Periodic Death Audits*, February 2021. [Bolton Insight February 2021](#).

⁹ In 2013, the Department of Labor Advisory Council on Employee Welfare and Pension Benefit Plans issued a report, [Locating Missing and Lost Participants](#).

¹⁰ This report included testimony from plan professionals. While that testimony can be dated and weighted toward defined contribution plans, is still very informative. [links to 2013 testimony the ERISA Advisory Committee on missing participants](#).

¹¹ United States Department of Labor, *Missing Participants – Best Practices for Pension Plans*, January 12, 2021, 4. [Missing Participants -- Best Practices for Pension Plans, EBSA \(January 12, 2021\)](#).

¹² Craig, Megan and Davison, Madeleine, *Secrecy in Death Records: A Call to Action*, The Journal of Civic Information, Volume 2, Number 4, December 2020.

¹³ PBGC uses the term "recovery" to mean the return of money from a benefit that has ended, for example, if the overpaid person died without a stream of benefits going to a survivor. It uses the term "recoupment" to refer to the return of overpayments from a stream of benefits that continues to exist, for example, if PBGC partially or fully offsets a survivor's benefit to repay the money that was wrongly paid after a participant died. Subject to certain conditions, PBGC handles recoupment and recovery itself in

the single employer insurance program and requires the plan administrator to handle it in traditional financial assistance.

¹⁴ Pension Benefit Guaranty Corporation Office of the Inspector General, *PBGC Should Exclude Deceased Terminated Vested Participants from Special Financial Assistance Calculations*, March 22, 2023, 8. [EVAL-2023-05 \(March 22, 2023\)](#).

¹⁵ When a multiemployer plan “becomes insolvent (i.e., its available resources are insufficient to pay benefits due under the plan for a plan year), the plan sponsor is required to suspend the payment of benefits that cannot be paid from the plan’s available resources, but not below the level of benefits guaranteed by PBGC If the plan’s available resources are less than the amount necessary to pay benefits at the guaranteed level, the plan sponsor is required to apply to PBGC for financial assistance so that benefits can be paid at the guaranteed level.” [General Duties of a Plan Sponsor of a Terminated Multiemployer Plan, PBGC website](#).

¹⁶ Historically, PBGC has treated these loans as grants and discounted the possibility of collection on its annual financial statements. However, with enactment of ARP, PBGC asserted these documents as valid business promises and “netted out” several hundred million dollars in SFA directly from the United States Treasury before paying the applying plans their requested SFA; thus, for the first time, the multiemployer insurance trust fund is partially financed with taxpayer funds.

¹⁷ Pension Benefit Guaranty Corporation, *General Instructions for Multiemployer Plans Applying for Special Financial Assistance*, January 3, 2023. [General Instructions for Multiemployer Plans Applying for Special Financial Assistance \(undated\)](#) at Section B(9). PBGC has further stated that, if a plan decides to add back in formerly excluded “missing participants,” PBGC will not question these added costs to the projected payment computation, if along with the audit documentation required in these General Instructions, the plan submits:

- A listing of the participants whose benefits were excluded from the measurement of liabilities in the most recent actuarial valuation that are now included in the determination of the amount of SFA (or for purposes of determining eligibility for SFA),
- A description of the plan’s policies and procedures for locating missing participants, as well as how the plan attempted to locate these newly added participants, and
- proof of a recent death audit that show that “there is no readily available information indicating that any such participants are deceased.”

¹⁸ Pension Benefit Guaranty Corporation, *Special Financial Assistance Assumptions*, January 3, 2023, 12; 23. [PBGC Guidance \(updated January 3, 2023\)](#).

¹⁹ Pension Benefit Guaranty Corporation Office of the Inspector General, *PBGC Should Exclude Deceased Terminated Vested Participants from Special Financial Assistance Calculations*, March 22, 2023, 32. [EVAL-2023-05 \(March 22, 2023\)](#).

²⁰ National Committee on Vital Health Statistics, *Vital Records and Vital Statistics in the United States: Uses, Users, Systems, and Sources of Revenue*, January 10, 2018, page 8.

²¹ U.S. Government Accountability Office, *Social Security Death Data: Additional Action Needed to Address Data Errors and Federal Agency Access*, GAO-14-46, November 2013, page 9.

²² National Academy of Public Administration for the Social Security Administration, *A Report to Congress on Sources of and Access to State Death Data*, July 2022, 26. [SSA-State-Death-Data.pdf](#)

²³ National Academy of Public Administration for the Social Security Administration, *A Report to Congress on Sources of and Access to State Death Data*, July 2022, 57. [SSA-State-Death-Data.pdf](#)

Feedback

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