



February 28, 2001

Dear Colleague:

I want to thank you and your staffs for the helpful and thoughtful comments we received concerning the specifications for collecting and reporting the items on the death certificates as well as the race items on the birth and death certificates. In order to reach all of you, this letter includes our responses on a number of issues that were raised by individual States. I anticipate writing you again soon with additional information concerning the specifications for the race items as well as other topics needing further clarification.

Questions were raised about the complexity of the specifications for the race items. As mentioned, I will address this topic in a separate letter. For now, I am responding to some of the specific questions that were raised about the race specifications.

(1) How should we deal with fractional entries, e.g., 2/3 Chinese, 1/3 black?

An instruction will be added that fractions should be ignored.

(2) Some States would like to include other racial entries to take account of their State's demographic composition. Is this acceptable to NCHS?

NCHS has no problem with additional racial/ethnic categories *per se*. However, if a State wishes to provide additional categories, these should be added at the end of the standard list. For exceptions, please contact me. The topic of additional categories is discussed in the document, "Specifications for Collecting and Editing the United Standard Certificates of Birth and Death – 2003 Revision," which we mailed to you early in February.

(3) Some States expressed concern about the "refused" option being offered on the death certificate.

The NCHS-proposed edit specification for race allows for different types of "unknown" responses, to assist the States with trouble-shooting if the item is not completed. If a State declines to use the "refused" response, they should include instructions in their edits for how to deal with refusals.

(4) What are the appropriate responses for the race item(s)?

The procedures for the collection of information on race are based on an OMB directive (1997). People are given the right to report what they are. There is no censorship of an "appropriate" entry.

(5) How can we capture write-in responses for the "Other Asian," "Other Pacific Islander," and "Indian tribe" entries?

Some have suggested that for the death certificate, the funeral director should give the informant

a card to obtain the information on name, race, date of birth, Hispanic origin, education, Social Security Number, and so forth for the demographic items. This card would include “Other Asian,” “Other Pacific Islander,” and “Indian tribe” entries. If the informant gives any of these entries, he/she will be asked to provide the specific information.

Questions and comments were raised on several other items on the death certificate. Many commenters asked if NCHS will accept additional categories for certain items. In general, the specifications we have provided represent a model which we hope that States will follow. However, in most cases additional detail or categories are acceptable, so long as the data transmitted to NCHS is reported in the standard categories as listed in the specifications and additional categories are appended to the end of the standard list. The document “Specifications for Collecting and Editing...” mentioned above includes a discussion of this topic. Additional details are included in the detailed responses which follow.

Some States raised questions about the “Decedent’s legal name” field.

(1) What are the requirements for naming conventions?

NCHS is only getting one file with names (the NDI). Therefore, States can collect the names in any way that they wish, but the transmission file specifications have to be met for the NCHS file.

(2) Concern was also expressed that medical records not be suggested as a source for the decedent’s name.

NCHS will use the term “other acceptable sources” instead of “medical records.”

(3) Questions were raised about the use of the alias field.

NCHS will revise the instruction to allow full aliases, that is, the complete alias rather than just the part that is different

(4) Some States were concerned about inconsistent terminology, e.g., “surname” and “last name.”

NCHS will revise the instruction to use consistent terminology and will use the term “surname” as in the current NCHS instruction manual.

A question was raised as to why we are collecting both age and date of birth and the calculation of age.

Both items were recommended by the Panel to Evaluate the U.S. Standard Certificates. Having both items provides internal edits, helps promote the most accurate possible information, and reduces item non-response if one or the other is left blank.

NCHS will revise the instruction to indicate that age should be calculated and reported correctly, not estimated.

How should States deal with the territories in connection with the Birthplace of the decedent item?

Some suggested that the “yes” response be offered first to the question, “Was _____ born in the United States?” since that is the most likely response. Questions were also raised about how to refer to the territories in the context of this question.

NCHS will modify the specification to offer the “yes” response first. In addition, NCHS will

modify the question to read: "Was _____ born in the United States?" If yes, the follow-up question will be "What State or U.S. territory was _____ born in?" If no, the follow-up question will be "What country was _____ born in?"

What about the reporting of rural route numbers and temporary residences?

The Panel on the Evaluation of the U.S. Standard Certificates decided not to include rural route numbers on the standard certificates since rural route numbers are being eliminated because of the need for exact street addresses for emergency response systems (e.g., "911"). In addition, rural route numbers are not helpful for GIS-coding purposes. States have the option of reporting rural routes for their own purposes, but not for the residence address. The question about temporary residences can be important in terms of law and tax policy. We should note that the instructions for collecting residence have not changed and are in fact the same as for the last three revisions, and the same as used by the Census. However, how to deal with temporary residences is really a State matter.

A question was raised concerning whether Super Micar will be changed to accept "pending" when the cause of death is pending. Super Micar will accept "pending" in these cases. Some commenters pointed out the need for clarification of the Manner of Death instructions, page 5 of the specifications. We will revise the last sentence before "State File Considerations" as follows: "If cause of death is pending, then the manner of death should be listed as pending."

Concerns were raised about the "other" checkbox response for the "Method of disposition" item. Some suggested that an open-ended question might work better for this item, given the interest in this information.

NCHS will clarify to the States that they can add categories as appropriate for their State, and that more than one response can be collected. We will suggest this hierarchy for reporting this information: Burial, Cremation, Donation, Entombment, Removal from State, Other. In any case, only one response is to be transmitted to NCHS.

Concerning the "Injury at Work" item, a question was asked about accepting "homemaker working at homemaking activities" as an appropriate response. Responses to this category are based on definitions provided by NIOSH. The item "Describe How the Injury Occurred" should be transmitted exactly as reported, as a literal.

Questions were raised about the level of detail in the "Transportation Injury" edit.

There is a need to know whether the decedent was the driver or a passenger, which vehicle the decedent was in (or not), and so forth, in order to code cause of death in ICD-10 with full specificity. It is expected that Super MICAR will be set up to accept these details by 2003. We will provide more information on this as it becomes available. NCHS staff will obtain Idaho's list of "other" entries for transportation injury.

At least one State is interested in having a separate code for "no school" in the Education item.

We are concerned that this could present problems in interpreting this item. A State that makes this distinction will have to clarify that the category “8th grade or less” means “any education up to and including 8th grade.” The categories in the 2003 revision are different from those in the 1989 revision; they were changed to conform to Census categories, to facilitate the calculation of population-based rates.

The instruction for the “Decedent of Hispanic Origin?” question indicating that more than one box can be checked was developed this way because we anticipate that some people will want to check more than one response. Neither the Census Bureau nor NCHS has taken a position against providing more than one checkbox response.

One State asked if the Cause of death item can include the prompt “Do not list old age or senility.”

It is imperative that the medical certification section mimic the prompts and formatting of the standard as required by the World Health Organization. An additional prompt of this nature may be acceptable. Any State considering one should contact my office for further guidance. In response to another State’s request, NCHS will add “hypovolemic shock” to the list of conditions needing additional information.

Questions were raised as to why an edit was included for Pronouncing.

An edit was provided for the States that wish to have this item, so that the information would be collected and reported in a standard format.

Please note that I am including with this letter a copy of the latest draft of the revised birth certificate (dated 2/27/2001) for your use in reviewing the birth certificate specifications. There was a typographical error in the version we sent to you early in February.

I want to thank you again for your continued assistance with this phase of the implementation process. We look forward to receiving your comments about the specifications for the birth certificate items which we mailed to you last week. We will keep you informed on our progress in implementing the new standard certificates.

Sincerely,

Mary Anne Freedman
Director
Division of Vital Statistics