



EVERMORE

2101 L Street, NW
Suite 300
Washington, DC 20037
T: 202-263-3656
www.evermore.org

June 21, 2024

Social Security Administration
OLCA
Attn: Reports Clearance Director
Mail Stop 3253 Altmeyer
6401 Security Blvd.
Baltimore, MD 21235

Submitted via regulations.gov

Re: Docket No: SSA–2024–0011, Agency Information Collection Activities: Proposed Request and Comment Request

Dear Commissioner Martin O’Malley and esteemed Social Security Administration (SSA) staff,

Thank you for your service and leadership to our nation, and thank you for your interest and attention in soliciting public comments pertaining to the Statement of Death by Funeral Director form and State Death Match. We believe amending this form offers a unique opportunity to identify parentally bereaved children, who may be eligible to receive Social Security benefits.

Bereavement — the death of someone meaningful in our lives — is increasingly a direct concern for millions of people, including children. Not only are concurrent mortality crises touching most Americans – homicide, overdose, suicide, maternal mortality, and traffic fatalities – but millions of people in America were impacted by the COVID-19 pandemic, a population-level mass casualty event.

In 2021-22, Evermore partnered with Ashton Verdey, Ph.D. and Alexander Chapman, Ph.D. of Penn State and Emily Smith-Greenaway, Ph.D. of the University of California, to update parental mortality estimates and trends. We found childhood bereavement was at a 20-year high in every state of the nation and rising across every racial and ethnic population, with a disproportionate toll on Indigenous children.

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Today, more than 2.2 million children in America have experienced the death of a co-resident parent, many of whom are not accessing the Social Security benefits for which they are eligible to receive. According to one estimate, as many as 50 percent of parentally bereaved children are not receiving Social Security benefits.¹

According to Weaver, children who do not receive Social Security benefits grow up in greater poverty, attain less academically, and earn lower wages for the rest of their lives.² We believe that amending the Statement of Death by Funeral Director form may offer an opportunity to identify children who may be eligible to receive such benefits at the time of parental death — and, as a result, the SSA may readily identify eligible children and prevent poor health, social, and economic outcomes.

Today, the form collects information related to the surviving spouse:

6.(a) Name of Surviving Spouse - if not applicable, names of any minor or disabled children (if known)	6.(b) Surviving Spouse SSN

We recommend amending this portion of the form to allow for funeral directors to delineate surviving children. As with the surviving spouse line, providing options to list children by name and social security number to the Statement of Death by Funeral Director form will enable SSA to identify and locate beneficiaries.

Another option to identify beneficiaries may include adding parental lines to birth certificates which can be cross-checked for accuracy with the Statement of Death by Funeral Director form.

Bereavement is a human experience that, when taken collectively, impacts millions of Americans annually, often with a long tail shadowing lives for months, years, and even decades.^{3,4} Unbeknownst to most, bereavement impacts economic opportunity, redirecting life trajectories downward, and has major spillover effects at every stage of life. Large epidemiological studies have demonstrated that bereavement is a significant risk factor for poor health, including

¹ David Weaver, “Parental Mortality and Outcomes Among Minor and Adult Children,” *Population Review* 58, no. 2 (September 2019), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3471209.

² *Ibid.*

³ Rogers, C., Floyd, F., Mailick Seltzer, M., Greenberg, J., & Hong, J. (April 2008). Long-Term Effects of the Death of a Child on Parents’ Adjustment in Midlife. *Journal of Family Psychology*, p. 203-211.

⁴ Evermore, “America’s Forgotten Orphans” December 2022. Accessed at: <https://evermore.org/wp-content/uploads/2023/01/Evermore-Childhood-Report.pdf>.

premature death for bereaved parents,⁵ siblings,⁶ children⁷ and spouses.⁸ Bereavement is associated with serious mental health disorders,^{9,10,11} teen pregnancy,¹² violent crime involvement,¹³ youth delinquency,^{14,15} substance abuse,^{16,17} diminished academic attainment,¹⁸ psychiatric hospitalizations,¹⁹ dementia,²⁰ diminished lifetime income,²¹ and less purpose in life,²² among many others.

For these reasons and more, Evermore has led efforts with federal lawmakers to increase the attention and prioritization of bereavement policy and systems change across the U.S. government. On behalf of millions of bereaved people and children, Evermore helps raise awareness of the consequences of bereavement on society, advances sound research that drives policy and program investments, and advocates on behalf of bereaved families for whom minimal protections or evidence-based services are available.

⁵ Li J, Precht DH, Mortensen PB, Olsen J. Mortality in parents after death of a child in Denmark: a nationwide follow-up study. *Lancet*. 2003 Feb 1;361(9355):363-7. doi: 10.1016/S0140-6736(03)12387-2. PMID: 12573371.

⁶ Yu Y, Liew Z, Cnattingius S, Olsen J, Vestergaard M, Fu B, Parner ET, Qin G, Zhao N, Li J. Association of Mortality With the Death of a Sibling in Childhood. *JAMA Pediatr*. 2017 Jun 1;171(6):538-545. doi: 10.1001/jamapediatrics.2017.0197. PMID: 28437534; PMCID: PMC5540009.

⁷ Guldin M, Li J, Pedersen HS, et al. Incidence of Suicide Among Persons Who Had a Parent Who Died During Their Childhood: A Population-Based Cohort Study. *JAMA Psychiatry*. 2015;72(12):1227-1234. doi:10.1001/jamapsychiatry.2015.2094

⁸ Christakis NA, Allison PD. Mortality after the hospitalization of a spouse. *N Engl J Med*. 2006 Feb 16;354(7):719-30. doi: 10.1056/NEJMsa050196. PMID: 16481639.

⁹ Li, Jiong, et al. "Hospitalization for Mental Illness among Parents after the Death of a Child." *The New England Journal of Medicine*, vol. 352, no. 12, 24 Mar. 2005, pp. 1190-1196. DOI: 10.1056/NEJMoa033160.

¹⁰ Jacobs JR, Bovasso GB. Re-examining the long-term effects of experiencing parental death in childhood on adult psychopathology. *J Nerv Ment Dis*. 2009 Jan;197(1):24-7. doi: 10.1097/NMD.0b013e3181927723. PMID: 19155806.

¹¹ Jakobsen IS, Christiansen E. Young people's risk of suicide attempts in relation to parental death: a population-based register study. *J Child Psychol Psychiatry*. 2011 Feb;52(2):176-83. doi: 10.1111/j.1469-7610.2010.02298.x. Epub 2010 Oct 29. PMID: 21039482.

¹² Fletcher J, Mailick M, Song J, Wolfe B. A sibling death in the family: common and consequential. *Demography*. 2013 Jun;50(3):803-26. doi: 10.1007/s13524-012-0162-4. PMID: 23073753; PMCID: PMC4302726.

¹³ Wilcox HC, Kuramoto SJ, Lichtenstein P, Långström N, Brent DA, Runeson B. Psychiatric morbidity, violent crime, and suicide among children and adolescents exposed to parental death. *J Am Acad Child Adolesc Psychiatry*. 2010 May;49(5):514-23; quiz 530. doi: 10.1097/00004583-201005000-00012. Erratum in: *J Am Acad Child Adolesc Psychiatry*. 2010.

¹⁴ Lansing AE, Plante WY, Beck AN, Ellenberg M. Loss and Grief Among Persistently Delinquent Youth: The Contribution of Adversity Indicators and Psychopathy-Spectrum Traits to Broadband Internalizing and Externalizing Psychopathology. *J Child Adolesc Trauma*. 2018 Sep;11(3):375-389. doi: 10.1007/s40653-018-0209-9. Epub 2018 Mar 28. PMID: 30344839; PMCID: PMC6193500.

¹⁵ Harnisher JL, Abram K, Washburn J, Stokes M, Azores-Gococo N, Teplin L. Loss Due to Death and its Association with Mental Disorders in Juvenile Detainees. *Juv Fam Court J*. 2015 Summer;66(3):1-18. doi: 10.1111/jfcj.12029. PMID: 26405364; PMCID: PMC4577059.

¹⁶ Hamdan S, Melhem NM, Porta G, Song MS, Brent DA. Alcohol and substance abuse in parentally bereaved youth. *J Clin Psychiatry*. 2013 Aug;74(8):828-33. doi: 10.4088/JCP.13m08391. PMID: 24021502; PMCID: PMC4037812.

¹⁷ Christiansen G, Reneflot A, Stene-Larsen K, Hauge LJ. Alcohol-related mortality following the loss of a child: a register-based follow-up study from Norway. *BMJ Open*. 2020 Jun 28;10(6):e038826. doi: 10.1136/bmjopen-2020-038826. PMID: 32595167; PMCID: PMC7322283.

¹⁸ Berg L, Rostila M, Saarela J, Hjern A. Parental death during childhood and subsequent school performance. *Pediatrics*. 2014 Apr;133(4):682-9. doi: 10.1542/peds.2013-2771. Epub 2014 Mar 10. PMID: 24616354.

¹⁹ Li J, Laursen TM, Precht DH, Olsen J, Mortensen PB. Hospitalization for mental illness among parents after the death of a child. *N Engl J Med*. 2005 Mar 24;352(12):1190-6. doi: 10.1056/NEJMoa033160. PMID: 15788495.

²⁰ Debra Umberson, Rachel Donnelly, Minle Xu, Matthew Farina, Michael A Garcia, Death of a Child Prior to Midlife, Dementia Risk, and Racial Disparities, *The Journals of Gerontology: Series B*, Volume 75, Issue 9, November 2020, Pages 1983–1995, <https://doi.org/10.1093/geronb/gbz154>.

²¹ Weaver, David, Parental Mortality and Outcomes among Minor and Adult Children (September 5, 2019). Population Review, Volume 58, Number 2, 2019, Available at SSRN: <https://ssrn.com/abstract=3471209>.

²² Rogers CH, Floyd FJ, Seltzer MM, Greenberg J, Hong J. Long-term effects of the death of a child on parents' adjustment in midlife. *J Fam Psychol*. 2008 Apr;22(2):203-11. doi: 10.1037/0893-3200.22.2.203. PMID: 18410207; PMCID: PMC2841012.

We applaud your leadership and thank you for the opportunity to submit comments. If I can provide clarification or additional information, please do not hesitate to contact me.

Sincerely,

Joyal Mulheron
Executive Director