

**MEMO# 27973**

March 24, 2014

## **Access to Death Master File Will End March 26th Unless Subscribers Complete Temporary Certification Form; Call Scheduled for Friday, March 28th**

URGENT/ACTION REQUESTED

[27973]

March 24, 2014

TO: TRANSFER AGENT ADVISORY COMMITTEE No. 16-14

PENSION MEMBERS No. 12-14

AML COMPLIANCE WORKING GROUP No. 1-14 RE: ACCESS TO DEATH MASTER FILE WILL END MARCH 26TH UNLESS SUBSCRIBERS COMPLETE TEMPORARY CERTIFICATION FORM; CALL SCHEDULED FOR FRIDAY, MARCH 28TH

The National Technical Information Service (NTIS) has announced that after this Wednesday, March 26th, 2014, access to the Death Master File (DMF) will be denied to any person who has not received a temporary certification and paid a certification fee to access the DMF. [1] Until such time as a permanent certification program is in place, NTIS has established a temporary certification program for DMF subscribers, which is briefly described below. Although NTIS previously indicated that it would accept comments on the limited access subscriber certification form through March 24, 2014, it appears that NTIS has nonetheless finalized the form and implemented its utilization, while also indicating that it will accept comments for the next thirty days on the program.

The Institute has scheduled a member call to discuss the certification process and comments we should raise with NTIS in a comment letter. The call will be held this Friday, March 28th from 2-3 p.m. [Eastern]. If you plan to participate in the call, please contact Valencia Paige at [valencia.paige@ici.org](mailto:valencia.paige@ici.org) no later than close of business on March 27th to obtain the call-in information. If you are unable to participate in the call but have comments you would like the ICI to consider raising in its letter, please contact Joanne Kane by phone (202-326-5850) or email ([joanne.kane@ici.org](mailto:joanne.kane@ici.org)) prior to the call.

Summary of the Temporary Certification Program's Requirements

Pursuant to the temporary certification program, in order to continue access to the DMF

after March 26, 2014, subscribers and licensees must take the following actions: [2]

1. Submit a completed Limited Access DMF Certification Form;
2. Pay the \$200 certification fee; and
3. Submit a new Subscriber Agreement or Licensee Agreement.

According to the Limited Access Death Master File Certification Application Instructions, NTIS will begin accepting completed certification forms and fees beginning at 8:00 am ET on Monday, March 24, 2014. Current DMF subscribers and licensees must first complete the Limited Access DMF Certification Form and pay a \$200 certification processing fee. Upon payment, subscribers will receive an invoice/order number which must be entered in the appropriate field on the Certification Form before filing. Once the Certification Form has been filed, NTIS will notify filers by email of acceptance of the Certification Form. Subsequent to receiving notice that the Certification Form has been accepted, subscribers and licensees must complete a new Subscriber Agreement or Licensee Agreement and file the new agreement(s) with NTIS. Current DMF subscribers do not have to pay a subscription fee until the term of their current subscription expires.

Although NTIS is implementing the Certification Form via an interim final rule, it plans to continue to refine the certification program through a separate notice and comment rulemaking process, to be initiated as soon as possible.

Howard Bard  
Associate Counsel

Tamara K. Salmon  
Senior Associate Counsel

Joanne Kane  
Director-Operations & Transfer Agency

#### **endnotes**

[1] NTIS is establishing the temporary certification program through an Interim Final Rule to be published in the Federal Register on March 26, 2014. A copy of the interim final rule is available here: <http://www.ntis.gov/pdf/dmf-ifr.pdf>. NTIS previously issued a Request for Information (RFI) regarding the DMF certification program and the Institute filed a comment letter responding to the RFI. See Memorandum to Transfer Agent Advisory Committee No. 14-14, Pension Members No. 9-14 [27958], dated March 14, 2014.

[2] Information about the DMF Certification Process, including the forms that must be filed, the fees that must be paid, and instructions on where and how to file them is available through the NTIS website at: <http://www.ntis.gov/products/ssa-dmf.aspx>.

should not be considered a substitute for, legal advice.