



February 19, 2026

The Honorable Auditor General Timothy L. DeFoor  
Commonwealth of Pennsylvania  
Room 229, Finance Building  
Harrisburg, PA 17120

Dear Auditor General DeFoor:

Re: Request for Audit of the Division of Vital Records

We write to you in our capacities as elected members of the Pennsylvania General Assembly with a request for your office to conduct a performance audit of the Department of Health's (Department) Bureau of Health Statistics and Registries (Bureau) and its Division of Vital Records (Division) pursuant to your authority under sections 402 and 403 of the Fiscal Code (72 P.S. §§ 402 and 403) and any other applicable statutory authority. To be clear at the outset of this request, we are not asking your office to examine individual vital records such as birth and death certificates. Rather, we are asking your office to examine the policies, processes, and procedures implemented by the Department, through the Bureau and Division (including the State Registrar), in serving as the official custodian of vital records for the Commonwealth. With this audit, we request that you make recommendations that you determine may be needed to address any deficiencies found.

By way of a brief background, our offices often serve as a point of contact for our constituents when they are requesting vital records, specifically birth and death certificates. Our offices also field complaints from constituents when there are substantial delays in the processing of these vital records. Over the past several years, these complaints have increased to the point that we feel an audit is necessary. Below are examples of some of the issues that our constituents and offices have faced when trying to navigate what has become a frustrating process in trying to obtain vital records.

- On September 15, 2023 (effective on October 1, 2023), the State Registrar issued a Notice regarding “Funeral Home Applications for Death Certificates with Fees Waived

for Members of the U.S. Armed Forces.”<sup>1</sup> The Notice clarified that the death certificate fee waiver only applies when:

- 1) The decedent was a member of, or was honorably discharged from, the armed forces of the United States; or
- 2) The surviving spouse of the decedent is a current member of, or was honorably discharged from, the armed forces of the United States.

This Notice effectively changed the Division’s fee waiver policy, and death certificates for the spouse of a predeceased veteran were no longer provided free of charge. We are not aware that this decision was sent to relevant stakeholder groups in advance. However, this decision was not announced to legislative offices so that they could be prepared, which generated confusion as funeral homes began to report certificate denials. In response, the General Assembly passed Act 137 of 2024, which in part ensured that the fee waiver would continue to apply to death certificates for the spouse of a predeceased veteran.

- On September 6, 2024 (subsequently revised on September 27, 2024), the State Registrar issued a Notice regarding “eVitals Vital Records Management System Transition for Birth and Death Reporting.”<sup>2</sup> The online reporting system underwent an integration and upgrade in early October that same year, during which time the Department was unable to register deaths. Funeral homes and coroners reported account access issues and processing delays. While these issues were eventually rectified, and we understand that any new system upgrade may present initial challenges, residual delays were experienced for months following the integration, which negatively impacted grieving families in need of time-sensitive documents.
- In February 2025, the Division revised its Application for a Birth Certificate.<sup>3</sup> The new form required documentary proof for the veteran fee waiver, though the prior version of the application only required the armed forces member’s name, service number, and rank and branch of service to be provided. Again, legislative offices were not notified of this change, and in this scenario, the State Registrar did not issue a Notice regarding the updated form. This resulted in birth certificate application rejections which could have easily been avoided had proper notice been provided. It is important to note that when the Division

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<sup>1</sup> <https://www.pa.gov/content/dam/copapwp-pagov/en/health/documents/topics/documents/reporting-registries/2023-05%20Veteran%20Fee%20Waiver%20Guidance%20for%20Funeral%20Directors.pdf>

<sup>2</sup> <https://www.pa.gov/content/dam/copapwp-pagov/en/health/documents/topics/documents/reporting-registries/SRN%202024-01%20-%20eVitals%20Transition%20for%20Birth%20and%20Death%20Reporting.pdf>

<sup>3</sup> [https://www.pa.gov/content/dam/copapwp-pagov/en/health/documents/topics/documents/certificates-and-records/Application\\_for\\_a\\_Birth\\_Certificate.pdf](https://www.pa.gov/content/dam/copapwp-pagov/en/health/documents/topics/documents/certificates-and-records/Application_for_a_Birth_Certificate.pdf)

began requiring documentation for fee waived death certificates in 2023 (the same issue but applied to death certificates rather than birth certificates), the change was noted in a State Registrar Notice (referenced in the first bullet point). This reveals inconsistencies with the Department's use of State Registrar Notices to communicate changes to the public.

- On June 18, 2025 (originally effective until September 1, 2025), the State Registrar issued a Notice regarding a “Temporary Quantity Restriction on Ordering Vital Record Certificates”<sup>4</sup> because the Department was experiencing an inventory shortage of security paper used to make birth and death certificates. As such, the Department temporarily limited the number of birth and death certificates that could be requested. This temporary change was rescinded effective August 1, 2025.
- Concerning processing delays, we were recently made aware of a backlog in death certificate processing over the holiday season. These delays are especially problematic given their potential to hinder the timely completion of the disposition selected by the family of the deceased, the potential inability to access funds needed to pay for the funeral services selected, and the inability to open or administer an estate.

As noted, the above are just a few examples of the problems that have been experienced in a short amount of time with obtaining vital records from the Department. Even before the pandemic, these issues were apparent.

As we continue to communicate with relevant stakeholders, we will explore possible legislative fixes to address this situation. However, before we proceed, we need to fully understand the scope of the problems regarding how the Division is run, how records are processed, and how records are distributed.

If you determine that an audit is warranted, we respectfully request that your office review all aspects of the policies, processes, and procedures related to how the Department—through the Bureau and the Division (including the State Registrar)—operates and make recommendations for addressing any issues you discover. In your audit, we request you consider the following, in addition to any other parameters you deem appropriate:

- Whether the eVitals vital records management system works as intended, including whether the current hybrid system of electronic and paper records needs to be revised.

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<sup>4</sup> <https://www.pa.gov/content/dam/copapwp-pagov/en/health/documents/topics/documents/reporting-registries/SRN%202025-03%20-%20Temporary%20Quantity%20Restriction%20on%20Ordering%20Vital%20Record%20Certificates.pdf>

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- How the Division processes requests for vital records, including how timely these requests are fulfilled.
- How the Bureau, Division, and/or State Registrar alert the public (including legislative offices) of policy changes, new requirements, system upgrades, etc., and whether the notification process, including State Registrar Notices, is sufficient and used consistently. To that end, whether a listserv or other options to subscribe for automatic updates from the State Registrar should be implemented.
- Staff complements to determine whether there are enough individuals to process these requests in a timely manner. This request includes the Department's authorized vendor, VitalChek, which processes online applications for vital records.
- How the fiscal appropriation the Department receives for the Division is specifically used.

In performing this audit, we request that you consider speaking with stakeholders directly impacted by these issues, including the Pennsylvania Funeral Directors Association and the Pennsylvania State Coroners' Association.

Thank you for your consideration of our request. If you have any questions, please do not hesitate to contact us.

Respectfully,



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House Health Committee  
Republican Chair  
65th Legislative District



Kerry A. Benninghoff  
171st Legislative District



Kristin Marcell  
178th Legislative District



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cc: Jesse Topper, Republican Leader, PA House of Representatives  
Kim L. Ward, President Pro Tempore, PA Senate  
Joe Pittman, Majority Leader, PA Senate  
Michele Brooks, Majority Chair, PA Senate Health & Human Services Committee  
Art Haywood, Minority Chair, PA Senate Health & Human Services Committee  
Dan Frankel, Majority Chair, PA House Health Committee  
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