

Audit Report

Individuals with Multiple Social
Security Numbers that Were Not
Cross-referenced in the Social
Security Administration's Systems

OIG

Office of the Inspector General
SOCIAL SECURITY ADMINISTRATION

MEMORANDUM

Date: November 25, 2014 **Refer To:**

To: The Commissioner

From: Inspector General

Subject: Individuals with Multiple Social Security Numbers that Were Not Cross-referenced in the Social Security Administration's Systems (A-02-14-34054)

The attached final report presents the results of our audit. Our objective was to assess the Social Security Administration's effectiveness in addressing individuals with multiple Social Security numbers that were not cross-referenced in its systems.

If you wish to discuss the final report, please call me or have your staff contact Steven L. Schaeffer, Assistant Inspector General for Audit, at (410) 965-9700.



Patrick P. O'Carroll, Jr.

Attachment

Individuals with Multiple Social Security Numbers that Were Not Cross-referenced in the Social Security Administration's Systems

A-02-14-34054



November 2014

Office of Audit Report Summary

Objective

To assess the Social Security Administration's (SSA) effectiveness in addressing individuals with multiple Social Security numbers (SSN) that were not cross-referenced in its systems.

Background

Generally, SSA assigns an individual one SSN to track his/her earnings and any benefits he/she may receive. In some cases, an individual can have more than one SSN. For example, when SSA assigns consecutive SSNs to members of the same family, one of the individuals can request a new SSN. If SSA assigns an individual more than one SSN, the Agency generally cross-references it electronically in its records.

We identified 21,891 pairs of SSNs that had the same name, date of birth, place of birth, and parents' names in the Numident that were not cross-referenced in SSA's systems. From this population, we reviewed 66 pairs of SSNs from the 217 individuals who were alive and had claims and/or earnings activity on both SSNs. We also reviewed 81 pairs of SSNs where SSA's records for 1 of the SSNs indicated the person was deceased and had another SSN, suggesting the person was alive.

Our Findings

We conducted this review because we were concerned that this population of multiple, non-cross-referenced SSNs created a risk for SSN misuse and/or benefit fraud. For example, an individual with two such SSNs could use one SSN to file a disability claim and use the other to work and earn wages. Because the SSNs were not cross-referenced, SSA would be less likely to recognize these situations as problematic and in need of investigation.

To determine whether the non-cross-referenced SSNs were misused, we attempted to identify cases of living numberholders who used both SSNs to collect benefits and/or earn wages. Of the 21,891 pairs we identified, only 217 had claims and/or earnings activity on both SSNs.

Of the 66 pairs we reviewed, 33 belonged to 2 different individuals. In all but one of these cases, the SSNs belonged to twins who had similar first names. Because they were twins, their date, place of birth, and parents' names were the same. In the last case, SSA acknowledged the individual had earnings discrepancies and issued the individual a new SSN.

The remaining 33 cases are questionable. We did not find evidence suggesting the SSNs belonged to separate individuals. Additionally, both SSNs had earnings in 22 of these cases, and SSA paid Old-Age, Survivors and Disability Insurance benefits to the individuals using 1 SSN, while the individuals had earnings recorded under the second SSN in 11 cases.

Of 81 pairs of SSNs where SSA's records for 1 of the SSNs indicated the person was deceased, we found 18 cases where both SSNs appeared to belong to the same person and both SSNs had reported earnings or benefit claims attributed to them.

Our Recommendation

We recommend that SSA review and take appropriate action to address the SSN pairs that were not cross-referenced and did not belong to two different individuals, including the five cases our Office of Investigations concluded needed further review or to be cross-referenced.

The Agency agreed with our Recommendation.

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ABBREVIATIONS

AESP	Automated Enumeration Screening Process
DB	Database
EAB	Enumeration at Birth
FALCON	Facsimile Screen Conversion for Online Data Input
FY	Fiscal Year
MULTX	Multiple Account Number Cross-Reference
OASDI	Old-Age, Survivors and Disability Insurance
OI	Office of Investigations
OIG	Office of the Inspector General
SS-5	<i>Application for Social Security Card</i>
SSA	Social Security Administration
SSI	Supplemental Security Income
SSN	Social Security Number
SSNEC	Social Security Number Establishment and Correction System
VSAM	Virtual Storage Access Record

OBJECTIVE

Our objective was to assess the Social Security Administration's (SSA) effectiveness in addressing individuals with multiple Social Security numbers (SSN) that were not cross-referenced in its systems.

BACKGROUND

An individual can request an SSN by completing an SSA Form SS-5, *Application for Social Security Card* (SS-5). Once an individual, or a third party on their behalf, completes and signs an SS-5, they can take the SS-5 to their local field office or SSN Card Center. The field office and Card Center staffs process these SS-5s through the Social Security Number Application Process, a Web application that SSA uses to process SSN requests. In Fiscal Year (FY) 2013, SSA processed approximately 840,000 original and 9 million replacement SSN cards through Social Security Number Application Process.

Parents often request SSNs for their newborn children through the Enumeration at Birth (EAB) process. EAB allows parents to request SSNs for their children as part of the State registration of their newborns, which tends to occur at the hospitals shortly after a child's birth. SSA enumerates the majority of U.S. citizens through EAB. In FY 2013, SSA processed about 3.9 million original SSNs through EAB.

Lawful resident aliens can receive SSNs through the Enumeration at Entry program, which is an interagency program between SSA, the Department of Homeland Security, and the Department of State. The Department of Homeland Security provides information on lawful permanent resident aliens to SSA, which then assigns them original SSNs or provides them replacement SSN cards. In FY 2013, SSA processed about 168,000 original and 18,000 replacement SSN cards requests through Enumeration at Entry.

Multiple SSNs

SSA generally assigns an individual one SSN to track the amount of wages he/she earns through work, which affects the amount of any Social Security benefit the individual may later receive. SSA also uses SSNs to track Social Security benefits or payments an individual may apply for and/or receive. Some individuals may legitimately acquire more than one SSN. For example, SSA can assign an individual a new SSN when evidence clearly indicates the individual's SSN has been misused, that he/she is disadvantaged by that particular misuse, and the misuse caused the individual economic or personal hardship. When SSA knowingly assigns a new SSN to an individual who already had an SSN, it cross-references the original and new SSNs in its electronic records. SSA has also erroneously assigned multiple SSNs to the same person when individuals

obtained an SSN through Enumeration at Entry, while also applying for, and obtaining, a second SSN at an SSA office.¹

Audit Population

To identify individuals with multiple SSNs that were not cross-referenced in SSA's systems, we matched original Numident records for all U.S. citizens and identified those that had the same first² and last names, dates of birth, places of birth, and parents' names. We then compared this population against the Multiple Account Number Cross Reference (MULTX) and eliminated all known cross-referenced SSNs. MULTX is SSA's database of cross-referenced SSNs.³ (See Appendix B for a flowchart of the MULTX process.)

We identified a population of 21,891 pairs⁴ of SSNs from the Numident that appeared to belong to 1 individual and were not cross-referenced in SSA's systems. Once we identified the pairs, we matched the records against the Master Beneficiary Record, Supplemental Security Record, and Master Earnings File to determine whether any of the numberholders were receiving Old-Age, Survivors and Disability Insurance (OASDI) benefits, Supplemental Security Income (SSI) payments, and/or earned wages on both SSNs between 2008 and 2010. From this population, we identified the following groups:

- 217 living individuals who had either earnings and/or collected OASDI benefits on both SSNs;
- 25 individuals who had either earnings and/or collected SSI payments on both SSNs; and
- 81 individuals who had a death indicator for 1 of the SSNs but not the other and had claims or earnings activity on the other SSN.

We reviewed 66 of the 217 pairs of SSNs that appeared to belong to living individuals who received OASDI and/or had earnings under both SSNs from the time they were disabled through 2012. The 66 pairs we reviewed consisted of a random sample of 50 pairs and another 16 pairs

¹ Previous SSA OIG work on this issue includes an *Assessment of the Enumeration at Entry Process* (A-08-04-14093), March 2005, and *Noncitizens Issued Multiple Social Security Numbers* (A-06-10-20155), December 2012. Also, SSA has reviewed this issue, in part, in its Office of Quality Review's annual Enumeration Review.

²We matched full first and last names. All of the pairs of SSNs in our population had the same first and last name in the original Numident record with no variations in the names.

³ Although SSA refers to the MULTX as a database, it is a Virtual Storage Access Record. It houses cross-referenced SSNs from 20 systems.

⁴ In 122 of the 21,891 pairs we identified a third SSN; in 4 cases, we identified a third and fourth SSN; and in 1 case, we identified 5 SSNs that appeared to belong to the same individual that were not cross-referenced. We reviewed three of these cases because they had earnings activity on more than one of the SSNs and found one of them to be questionable. None of the SSNs had benefits on more than one of the SSNs and none had benefits on one SSN and earnings on another.

of SSNs that belonged to individuals who were not in our sample of 50 cases and had received benefits on at least 1 of the SSNs.⁵

Additionally, we reviewed all 25 pairs that belonged to individuals receiving SSI and all 81 pairs of SSNs with a death indicator in the Numident for 1 of the SSNs.

RESULTS OF REVIEW

We conducted this audit because we were concerned that the population of multiple, non-cross-referenced SSNs we identified created a risk for SSN misuse and/or benefit fraud. For example, an individual with multiple, non-cross-referenced SSNs could use one SSN to work or claim benefits and allow an undocumented worker to use the other. In addition, an individual with two such SSNs could use one to file a disability claim and the other to work and earn wages. Because the SSNs were not cross-referenced, SSA was less likely to recognize these situations as problematic and in need of investigation.

To determine whether the non-cross-referenced SSNs were misused, we attempted to identify cases where living numberholders used both SSNs to collect OASDI benefits and/or earn wages. Of the 21,891 pairs we initially identified, only 217 had activity on both SSNs.

We reviewed 66 of the 217 pairs and determined that 33 appeared to belong to 2 different individuals. In all but one of these cases, the SSNs belonged to twins who had the same first names. Because they were twins, their date and place of birth and their parents' names were the same. In the last case, SSA acknowledged the individual had earnings discrepancies and issued the individual a new SSN.

After our initial review, we believed 33 cases were questionable. First, we did not find evidence suggesting the SSNs belonged to separate individuals. Second, in 22 of these cases, both SSNs had earnings,⁶ and, in 11 cases, SSA paid OASDI benefits to the individuals using 1 SSN, while the individuals had earnings recorded under the second SSN.⁷

Of the 25 cases with SSI claims activity, 6 were questionable. The remaining 19 belonged to twins who had the same first and last names.

We also reviewed 81 pairs of SSNs where SSA's records indicated 1 numberholder was deceased. Of these 81 pairs, 18 had earnings and/or a benefit claim on both SSNs.

⁵ Of the 66 cases, 30 had received benefits. The remaining 36 cases had earnings on both SSNs but did not receive benefits. Two of the 36 beneficiaries became entitled to disability benefits in 2012 after we selected our data.

⁶ In one case, the beneficiary had earnings on both SSNs and received SSI on one of the SSNs. SSA staff reviewed this case and concluded the same individual was using both SSNs.

⁷ In one case, the individual died after we selected the case for review.

Sample of Live Individuals with Earnings and/or OASDI Benefits

Of the 66 cases of living individuals we reviewed who had OASDI claims and/or earnings activity on both SSNs, we determined 33 were not questionable and 33 were. In all but one of the not questionable cases, the SSNs belonged to twins who had the same first and last names. Because they were twins, their date and place of birth and their parents' names were the same. In the last case, SSA acknowledged the individual had earnings discrepancies and issued the individual a new SSN.

We determined 33 cases were questionable because it appeared 2 SSNs were issued to the same individual, and both SSNs had OASDI claims and/or earnings activity.⁸

- In 22 cases, there were earnings on both SSNs.
- In 11 cases, there were earnings on 1 or both of the SSNs, and benefits were paid to an individual using 1 of the SSNs. Of these 11 cases, 9 of the individuals were still receiving benefits at the time of our audit.

The 11 individuals who earned wages and received benefits using 2 non-cross-referenced SSNs⁹ may not have been eligible for the benefits they received. The earned wages may indicate they were not truly disabled, and they were improperly paid benefits (see Table 1). For example, in 2004, one beneficiary became entitled to disability benefits based on one of the SSNs. Annual earnings attributed to the other SSN ranged from \$17,000 to \$80,000 from 2004 through 2013. If the same person used both SSNs, the individual appeared capable of employment and could have been ineligible for disability benefits. If true, the Agency may have overpaid the individual up to approximately \$72,000 from July 2004 through December 2013.

These cases need to be further developed to confirm the individuals used both SSNs to collect benefits and work at the same time.¹⁰ SSA reviewed three of the cases and reported it believed two individuals were using the SSNs in one case. SSA reported that the remaining two cases were similar in nature. In both cases, SSA reported that one individual received two SSNs that it had not cross-referenced. However, for both of these cases, SSA could not conclude whether the same individual was using both SSNs or whether the SSNs were being used by two different individuals.

⁸ One case involved earnings and SSI payments. We referred it to SSA's Center for Security and Integrity in the Dallas Region, which concluded the same individual was using both SSNs.

⁹ Of these 11 individuals, 6 were part of our sample of 50 cases and 5 were part of the additional 16 cases we added to our sample.

¹⁰ Although individuals receiving disability benefits on one SSN and working under another may be overpaid, we were not able to determine overpayment amounts. SSA staff would first need to determine which months the beneficiaries had substantial gainful employment and consider whether the beneficiaries were in trial work periods, among other factors.

Our Office of Investigations (OI) reviewed the nine questionable cases that involved a beneficiary receiving benefits at the time of our audit on at least one of the SSNs. After further review, it concluded five cases belonged to two different individuals. It also suggested that SSA further develop four other cases. For example, OI recommended that SSA correct an error it made in its recordkeeping, resulting in the second SSN being issued.

Table 1: Earnings¹¹ on at Least One SSN and OASDI Benefits on the Other SSN

Case Number	Benefits on SSN1	Year of Highest Earnings for SSN1	Highest Earnings on SSN1	Benefits on SSN2	Year of Highest Earnings for SSN2	Highest Earnings on SSN2	OI Conclusion
1	Disability Insurance (DI)	No Earnings After Becoming Disabled	\$0	None	2012	\$6,000	Two different individuals – Mother and daughter
2	DI and SSI	2007	\$8,000	None	2012	\$75,000	Two different individuals - Twins
3	DI	2008	\$28,000	Survivors Benefits ¹²	2012	\$30,000	Two different individuals - Twins
4	DI and SSI ¹³	2012	\$7,000	SSI ¹⁴	2012	\$35,000	The case did not meet prosecutorial guidelines; OI recommended we refer the case to SSA to correct its records.
5	DI	2000	\$16,000	Survivors Benefits	2010	\$7,000	Two different individuals – Mother and son
6	SSI	No Earnings After Becoming Disabled	\$0	None	2009	\$800	The case did not meet prosecutorial guidelines; OI recommended we refer the case to SSA to correct its records.

¹¹ We only reviewed earnings after the individual became disabled. For example, in case number 1, the individual had earnings but they were made before the individual became disabled.

¹² As of 2008, the individual was no longer receiving survivors' benefits.

¹³ As of 2008, the individual was no longer receiving SSI payments.

¹⁴ As of 2008, the individual was no longer receiving SSI payments.

Case Number	Benefits on SSN1	Year of Highest Earnings for SSN1	Highest Earnings on SSN1	Benefits on SSN2	Year of Highest Earnings for SSN2	Highest Earnings on SSN2	OI Conclusion
7	DI and SSI ¹⁵	2000	\$14,000	None	2012	\$25,000	SSA made an error in its recordkeeping; OI recommended we refer the case to SSA to correct its records.
8	DI and SSI ¹⁶	2006	\$26,000	SSI ¹⁷	2009	\$47,000	SSA made an error in its recordkeeping, resulting in a subsequent SSN being issued; OI recommended we refer the case to SSA to correct its records.
9	None	2012	\$22,000	DI	No Earnings after Becoming Disabled	\$0	Two different individuals - Twins

Sample of Individuals with Earnings and/or SSI Payments

Of the 25 cases we reviewed that had SSI claims and/or earnings on both SSNs, we determined 19 were not questionable and 6 were. We determined 19 of the SSN pairs were not questionable because they belonged to twins who shared the same first and last names. We determined the six cases were questionable because it appeared two SSNs were issued to the same individual, and both SSNs had SSI claims and/or earnings activity.

We sent five of the questionable cases to the Dallas Center for Security and Integrity and the other questionable case to the Office of Investigations for review. The Office of Investigations determined the SSNs belonged to two individuals. SSA reviewed the five cases and concluded the following.

- In two cases, the SSNs belonged to two separate individuals.
- In two cases, SSA agreed an individual received two SSNs. SSA cross-referred the SSNs.

¹⁵ As of 2006, the individual was no longer receiving SSI payments.

¹⁶ As of 2007, the individual was no longer receiving SSI payments.

¹⁷ As of 2000, the individual was no longer receiving SSI payments.

- In the remaining case, SSA agreed an individual received two SSNs, but that it could not conclude whether the same individual was using both SSNs or whether the SSNs were being used by two different individuals. SSA did not cross-reference the two SSNs.

Deceased Individuals with a Death Indicator and Earnings and/or Benefits

We reviewed 81 pairs of SSNs where SSA's records indicated the numberholder was deceased on 1 of the SSNs. Of the 81 pairs we reviewed, we determined 30 belonged to twins who had the same first and last names. For one pair that we reviewed, subsequent Numident records show different names and dates of birth for the two SSNs, indicating the SSNs belong to two different people.

We did not locate any evidence in SSA records to indicate the remaining 50 SSN pairs belonged to twins. The earnings and benefit claims activity of the 50 SSN pairs is detailed below.

- Nineteen of the SSN pairs had no reported earnings or benefit claims on either of the SSNs.
- Thirteen of the SSN pairs had earnings or claims activity on one, but not the other, SSN.
- Five of the SSN pairs had earnings on both SSNs, but no one was receiving benefits on the SSNs. In all five cases, earnings activity continued on the second of the pairs of SSNs after the reported deaths of the first numberholders.
- In 13 cases, 1 or both SSNs had earnings, and someone used 1 of the SSNs to receive benefit payments.¹⁸ Of those who received benefits, two cases were still receiving benefits at time of our audit.

SSA reviewed one of the two cases receiving benefits at the time of our audit and agreed it appeared an individual with the same name and other identifying information received two SSNs. However, SSA did not conclude whether the SSNs were being used by the same, or two different individuals.

OI also reviewed this case. After its initial review, it concluded that the SSNs were likely used by the same person and recommended that SSA further develop the case. Specifically, it recommended that SSA cross-reference the SSNs and related earnings.

OI reviewed the other questionable case that appeared to involve a beneficiary currently receiving benefits and determined the SSNs belonged to two different individuals.

¹⁸ Of the 13 cases receiving benefits, 3 received retirement benefits, 2 received disability benefits, 2 received SSI payments, and 6 received survivors' benefits.

Multiple Births

As previously noted, we concluded that some of the pairs of SSNs reviewed belonged to twins who had similar first names. We reached our conclusions based on review of the SS-5s used to request their SSNs or birth certificate numbers on the Numident. In many of these cases, SSA staff manually annotated on the SS-5s that the requests were for twins. Per policy, staff must indicate on SS-5s that the requests are for twins, or other multiple births, when processing SSN requests for multiple births and the first four letters of the first name and all other identifying information, such as the last name, date, and place of birth, and parents' name, are the same for the applicants. While staff annotated the paper SS-5s in these situations, SSA's systems do not allow a similar notation to be included in its electronic records. With the move to electronic records, SSA should consider whether it would be beneficial to add this indicator to its electronic systems in future systems development projects.

CONCLUSIONS

We identified 21,891 pairs of SSNs that were not cross-referenced in SSA's systems. When SSA issues multiple SSNs to the same individual and the SSNs are not cross-referenced in its systems, we believe the SSNs are at a greater risk of misuse. However, we only found a small number of questionable cases involving possible misuse and/or fraud.

RECOMMENDATION

We recommend that SSA review and take appropriate action to address the SSN pairs that were not cross-referenced and did not belong to two different individuals, including the five cases our Office of Investigations concluded needed further review or to be cross-referenced.

AGENCY COMMENTS

The Agency agreed with our Recommendation. The Agency's comments are included in Appendix C.

APPENDICES

Appendix A – SCOPE AND METHODOLOGY

To accomplish this objective, we:

- Reviewed pertinent sections of the Social Security Administration's (SSA) *Program Operations Manual System*.
- Identified 21,891 unique pairs of Social Security numbers (SSN) with the same first and last name, date and place of birth, and parents' names in the Numident that were not cross-referenced in SSA's systems. We matched full first and last names. All of the pairs of SSNs in our population had the same first and last name in the original Numident record, with no variations in the names. In our data extract, we compared our population with the Multiple Account Number Cross Reference (MULTX) dataset and only included those pairs that were not found in MULTX. We asked SSA's Office of Systems if it agreed with our data approach, and it believed reviewing MULTX seemed logical, but noted that not all records on the database were true multiple SSNs. Some data on the MULTX came from information stored on punch cards in the late 1970s. This included scrambled earnings and SSNs that may belong to relatives. In addition, depending on how old the information is on MULTX, the more likely the data is not accurate. They concluded that SSNs added to the MULTX in the last 5 years are more accurate. When we were able to determine that SSNs belonged to family members, rather than the same individual, we classified the case as non-questionable. Therefore, eliminating such a case from our review because it may have been in the MULTX does not negatively affect the reliability of our data.
- From the 21,891 unique pairs, we identified 217 pairs of SSNs for individuals who appeared to be alive and with earnings sometime between 2008 and 2010 on 1 SSN, and on the other SSN, had either earnings between 2008 and 2010 or Old-Age, Survivors and Disability Insurance (OASDI) benefits for at least 1 month between January 2008 and June 2011. We reviewed 66 of the 217 pairs of SSNs for individuals who appeared to be alive and had OASDI claims and/or earnings activity on both SSNs. When reviewing earnings for this and other samples reviewed, we reviewed earnings from the year the individuals became disabled through 2012.
- Identified 33 questionable cases. We determined the cases were questionable because we did not find evidence suggesting the SSNs belonged to two separate individuals. Also, in 22 of these cases, both SSNs had earnings, and in the remaining 11 cases, SSA paid OASDI benefits to the individuals using 1 SSN, while the individuals had earnings recorded under the second SSN.
- Identified 25 pairs of SSNs that had earnings and/or SSI claims activity.
- Reviewed 81 pairs of SSNs where SSA's records indicated the person assigned 1 of the SSNs was deceased. We referred the questionable cases to SSA and the Office of Investigations for review.

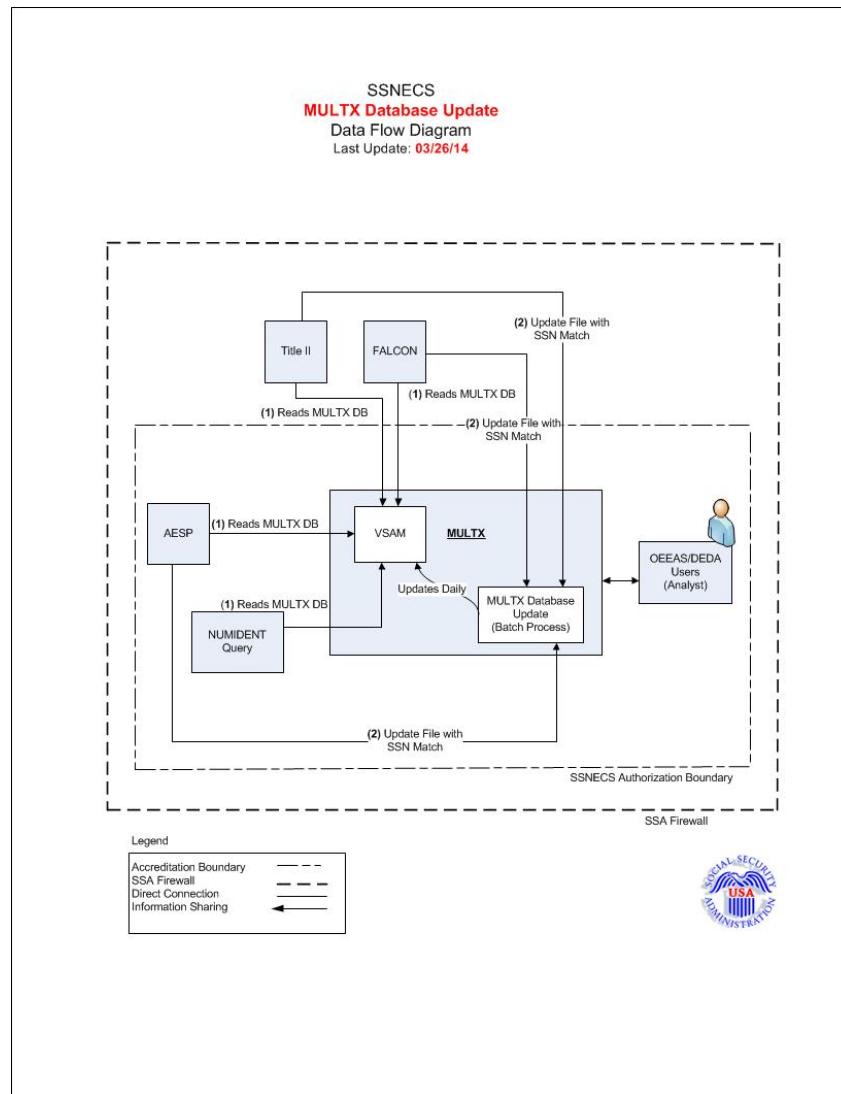
- Referred select questionable cases to SSA and our Office of Investigations for additional review.
- Interviewed, and reviewed documentation provided by the Offices of Policy, Operations, and Systems.

We conducted our audit work in the New York Audit Division, New York, and the Dallas Audit Division, Texas, between December 2013 and June 2014. The entities audited were the Office of Systems under the Office of the Deputy Commissioner for Systems and the Office of Operations under the Office of the Deputy Commissioner for Operations.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Appendix B – SSA’s SYSTEM MULTX DATA DIAGRAM

Figure B-1 SSA’s Multx Data Diagram



Appendix C – AGENCY COMMENTS



Social Security

MEMORANDUM

Date: October 29, 2014

Refer To: S1J-3

To: Patrick P. O'Carroll, Jr.
Inspector General

From: Katherine Thornton /s/
Deputy Chief of Staff

Subject: Office of the Inspector General Draft Report, "Individuals with Multiple Social Security Numbers that Were Not Cross-referenced in the Social Security Administration's Systems"
(A-02-14-34054) --INFORMATION

Thank you for the opportunity to review the draft report. Please see our attached comments.

Please let me know if we can be of further assistance. You may direct staff inquiries to

Gary S. Hatcher at (410) 965-0680.

Attachment

**COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL DRAFT REPORT,
“INDIVIDUALS WITH MULTIPLE SOCIAL SECURITY NUMBERS THAT WERE
NOT CROSS-REFERENCED IN THE SOCIAL SECURITY ADMINISTRATION’S
SYSTEMS” (A-02-14-34054)**

Recommendation 1

Review and take appropriate action to address the Social Security number pairs that were not cross-referenced and did not belong to two different individuals, including the five cases the Office of Investigations concluded needed further review or to be cross-referenced.

Response

We agree. We will review the cases and take appropriate actions based on our operating instructions by the end of March 2015.

Appendix D– MAJOR CONTRIBUTORS

Tim Nee, Director, New York Audit Division

Jason Arrington, Audit Manager, Dallas Audit Office

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Bosede Olaogun, Program Analyst, New York Audit Office

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