

Audit Report

Match of Connecticut Death
Information Against Social Security
Records



Office of the Inspector General

SOCIAL SECURITY ADMINISTRATION

MEMORANDUM

The attached final report presents the results of the Office of Audit's review. The objective was to determine whether individuals listed as deceased by the Connecticut State Vital Records Office were listed in Social Security Administration records as deceased.

If you wish to discuss the final report, please call me or have your staff contact Rona Lawson, Assistant Inspector General for Audit, 410-965-9700.

Gale Stallworth Stone

Attachment

Match of Connecticut Death Information Against Social Security Records

A-01-17-50248



December 2017

Office of Audit Report Summary

Objective

To determine whether individuals listed as deceased by the Connecticut State Vital Records Office (CSVRO) were listed in Social Security Administration (SSA) records as deceased.

Background

To identify and prevent payments after death, section 205(r) of the *Social Security Act* requires that SSA establish a program under which States can voluntarily contract with the Agency to provide death data to match against its records.

We obtained from the CSVRO a data file of more than 1 million individuals who had a date of death from Calendar Years (CY) 1979 through 2014.

We validated the Social Security numbers, names, or dates of birth of about 900,000 records. We matched these validated records to SSA's records to identify deceased individuals who were receiving SSA benefit payments; listed as representative payees; and non-beneficiaries with unrecorded deaths on SSA's records.

Findings

CSVRO death information was not always on SSA's records. As a result, SSA issued about \$1.9 million in benefits after death to 21 individuals who died in Connecticut from CYs 1979 through 2014. In addition, we identified three deceased individuals listed as representative payees who were issued \$173,690 in payments after death.

Conclusion

Although we identified a small number of deceased individuals to whom SSA issued payments, the cases we identified represent an opportunity for SSA to reduce payments after death and improve the completeness of its death information.

SSA suspended or terminated benefits, replaced deceased representative payees, and added death information to its records for some of the unrecorded deaths we brought to its attention. In addition, the Agency or our Office of Investigations continued to review the other outstanding death cases. Therefore, we made no recommendations for further corrective action.

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ABBREVIATIONS

C.F.R.	Code of Federal Regulations
CSVRO	Connecticut State Vital Records Office
CY	Calendar Year
EDR	Electronic Death Registration
OASDI	Old-Age, Survivors and Disability Insurance
OI	Office of Investigations
OIG	Office of the Inspector General
POMS	Program Operations Manual System
SSA	Social Security Administration
SSI	Supplemental Security Income
SSN	Social Security Number
U.S.C.	United States Code

OBJECTIVE

Our objective was to determine whether individuals listed as deceased by the Connecticut State Vital Records Office (CSVRO) were listed in Social Security Administration (SSA) records as deceased.

BACKGROUND

In Fiscal Year 2016, SSA paid about \$968 billion under the Old-Age, Survivors and Disability Insurance (OASDI) and Supplemental Security Income (SSI) programs to nearly 66 million beneficiaries.¹ Under these programs, payment to a beneficiary or recipient terminates when the individual dies.²

To identify and prevent payments after death, section 205(r) of the *Social Security Act* requires that SSA establish a program under which States can voluntarily contract with the Agency to provide death data to match against its records.³ When SSA receives and processes death data, its systems terminate payments to beneficiaries. In addition, SSA's systems record dates of death on its Numident file, which stores personally identifiable information for individuals who have been issued a Social Security number (SSN).⁴ SSA's full file of death information, as well as the publically available Death Master File, are created from Numident information. As required by law,⁵ SSA provides its full file of death information to other Federal benefit-paying agencies to prevent payments after death.⁶

¹ SSA, *Agency Financial Information Report for Fiscal Year 2016*, pp. 7-8 (November 9, 2016).

² 20 C.F.R. §§ 404.311(b) (2003), 404.316(b)(1) (2005), and 416.1334 (2015). We use the term “beneficiary” throughout this report in reference to OASDI beneficiaries and/or SSI recipients.

³ 42 U.S.C. § 405(r) (2015).

⁴ SSA, *POMS, GN-General*, ch. GN 026, subch. GN 02602.050, sec. A (February 1, 2017).

⁵ 42 U.S.C. § 405(r)(3) (2015). Other Federal benefit-paying agencies include the Railroad Retirement Board, Centers for Medicare and Medicaid Services, Internal Revenue Service, Department of Veterans Affairs, and Office of Personnel Management, among others.

⁶ SSA also provides the Death Master File, which is an extract of its death information that does not include State death data, to the Department of Commerce, which sells it to public and private customers. SSA, *POMS, GN-General*, ch. GN 033, subch. GN 03315.015, sec. A (January 6, 2017).

Improving Death Information

We have issued several reports related to death information on SSA's records.⁷ We also previously determined that SSA's procedures did not ensure a new representative payee was selected when a current representative payee died.⁸ Over the years, SSA has worked to improve the accuracy and completeness of death data. In addition, SSA has agreed to replace deceased representative payees identified in our reports.

SSA has been working with States to streamline death reports through the Electronic Death Registration (EDR) process.⁹ Through EDR, States verify an individual's SSN before they submit death information to SSA. SSA can then immediately terminate benefits and post the death to the Numident. As of December 2017, Connecticut does not submit death information using EDR.

Scope and Methodology

We obtained from the CSVRO a data file of more than 1 million individuals who had a date of death from Calendar Years (CY) 1979 through 2014.¹⁰ We reformatted the CSVRO death data to conduct our matches against SSA records. We ran the more than 1 million records through SSA's Enumeration Verification System and selected about 900,000 records that matched on either (a) SSN and name or (b) name, date of birth, and a different SSN. We matched these 900,000 validated records to SSA's OASDI and SSI payment records to identify beneficiaries or representative payees who were receiving payments but who had a date of death per Connecticut. We also matched the CSVRO death data to SSA's full file of death records to identify individuals who were not receiving OASDI benefits or SSI payments (that is, non-beneficiaries) and who had unrecorded deaths in SSA's Numident system. For further information on our scope and methodology, see Appendix A.

⁷ SSA, OIG, *Match of Massachusetts Death Information Against Social Security Administration Records*, A-01-17-50244 (September 2017); *Match of California Death Information Against Social Security Administration Records*, A-06-14-24138 (April 2017); *Numident Death Information Not Included on the Death Master File*, A-06-16-50069 (September 2016); *Office of Personnel Management Deaths Not in the Social Security Administration's Systems*, A-01-13-23032, (August 2016); and *Payments to Individuals with Deaths Reported in California from 1980 to 1987*, A-06-14-21416 (August 2014).

⁸ SSA, OIG, *Deceased Representative Payees*, A-01-14-34112, (June 2015), *Follow up on the Social Security Administration's Procedures to Identify Representative Payees Who Are Deceased*, A-01-06-16054, (October 2006); and *The Social Security Administration's Procedures to Identify Representative Payees Who Are Deceased*, A-01-98-61009, (September 1999). SSA appoints a representative payee to receive and manage benefit payments for individuals unable to manage or direct the management of their finances because of their youth or mental and/or physical impairments. *Social Security Act*, 42 U.S.C. § 405(j) (2015) and 1383(a)(2)(A)(ii) (2016).

⁹ SSA, OIG, *State Use of Electronic Death Registration Reporting*, A-09-15-50023 (July 2017). We found States that used EDR did not report all deaths using the system.

¹⁰ The CSVRO maintains a State-wide registry of all births, marriages, civil unions, and deaths in the State since July 1, 1897.

RESULTS OF REVIEW

CSVRO death information was not always on SSA's records. From the 900,000 Connecticut death records (where we could validate the SSN or name and date of birth), we identified

- 21 beneficiaries who were issued about \$1.9 million in payments after a date of death;¹¹
- 5 invalid matches (4 beneficiaries and 1 representative payee);
- 3 representative payees who were issued \$173,690 after a date of death;
- 1 beneficiary who had a date of death subsequently posted on SSA's records; and
- 7,756 non-beneficiaries who had a date of death per CSVRO but did not have a date of death on SSA's records.¹²

As of December 2017, SSA had suspended or terminated benefits, replaced deceased representative payees, and added death information to its records for some of the unrecorded deaths brought to its attention. In addition, the Agency or our Office of Investigations (OI) continued reviewing the outstanding cases.

Deceased Beneficiaries: Payments After Death

We identified 21 beneficiaries who were issued about \$1.9 million in payments after death. The average payment issued after death was \$92,670 and ranged from \$1,470 to \$269,660.

- SSA terminated benefits to 14 who had been issued \$577,550 in benefits after the dates of death.¹³ For example, a Connecticut woman died in June 2014. SSA's systems did not contain a date of death. Consequently, payments continued after death. We referred this case to SSA. In July 2017, SSA terminated retirement benefits and reclaimed \$5,800 paid after death.

In another example, a Connecticut woman died in December 2013. Her date of death was recorded in SSA's Numident; however, SSA's systems did not terminate her OASDI benefit payments. Consequently, OASDI payments continued after her death. We referred this case to SSA for review. As of June 2017, SSA had terminated OASDI benefits, and, as of December 2017, had reclaimed \$14,830 of the \$57,680 paid after death.

¹¹ The \$1.9 million includes \$577,550 SSA assessed and approximately \$1.4 million we estimated in payments after death. The \$577,550 in actual payments after death averaged \$41,250 paid over an average period of 68 months. As of December 2017, SSA had recovered \$73,300 of the \$577,550. The \$1.4 million in estimated payments after death averaged \$195,500 paid over an average period of 205 months. We rounded to the nearest \$10 throughout this report.

¹² We matched Connecticut death records with a validated SSN and name (per the Enumeration Verification System process) to SSA's Numident file and excluded individuals who were receiving OASDI and SSI benefit payments.

¹³ Of these 14 cases, OI continued reviewing one for possible fraud.

- SSA or OI continued reviewing seven whom we estimated SSA issued \$1.4 million in benefits after the dates of death.

Payments after death were made in these 21 cases because the beneficiaries' death information was not in SSA's payment records.¹⁴ As a result, SSA did not terminate benefit payments when the individuals died. See Table 1 for payments after death by beneficiary address in SSA's records and Appendix B for further details.

Table 1: Payments After Death by State or Territory

State or Territory	Cases	Payments After Death
Connecticut	15	\$1,353,450
Massachusetts	1	253,530
North Carolina	2	132,640
California	1	104,350
New York	1	100,280
Puerto Rico	1	1,810
TOTAL	21	\$1,946,060

Deceased Representative Payees

We identified three representative payees who were deceased. As of December 2017, we estimated SSA had issued \$173,690 to these three representative payees after their deaths.

When a representative payee dies, SSA's policy is to select a new payee.¹⁵ By replacing deceased representative payees, SSA aims to ensure funds are used to meet the beneficiary's needs, such as food, clothing, shelter, and medical care.

SSA's systems contained death information for each of the three deceased representative payees. Although these deaths were on SSA's records, SSA did not replace the decedents as representative payees. We provided SSA these three cases to take appropriate action. As of December 2017, SSA had replaced two representative payees and terminated one record because the beneficiary had also died.

¹⁴ For two cases, SSA's records contained the beneficiary's date of death, but benefits were not terminated (as described in the example of a Connecticut woman who died in December 2013).

¹⁵ 20 C.F.R. §§ 404.2050(d) (2004) and 416.650(d) (2004).

Invalid Matches and Deaths Subsequently Posted

We determined that five matches (four beneficiaries and one representative payee) were invalid because the individuals were alive.¹⁶ For example, our match identified a beneficiary who allegedly died in August 2007. However, SSA determined the individual was alive. The SSN the State reported was incorrect, as it was the beneficiary's twin who passed away. Therefore, our match was not valid.

In an additional case, SSA subsequently posted a date of death on its records because sources other than the OIG notified SSA about this individual's death. Therefore, SSA posted the death to the record before we transferred this case to the Agency.

Deceased Non-beneficiaries

We identified 7,756 non-beneficiaries who had a date of death per CSVRO data but did not have a date of death in SSA's records. A majority (73 percent) of these individuals died in CYs 1979 through 1989, see Table 2.

Table 2: Non-beneficiaries with a Date of Death per CSVRO Data and Without a Date of Death in SSA's Records

Year of Death per CSVRO Data	Number of Non-beneficiaries with a Date of Death per CSVRO Data and Without a Date of Death in SSA's Records	Portion of Records
1979-1989 ¹⁷	5,625	73%
1990-1999	1,023	13%
2000-2009	858	11%
2010-2014	250	3%
TOTAL	7,756	100%

In March 2017, we provided SSA a file of these 7,756 records. As of December, SSA was reviewing this file and working to obtain further information from the State—such as parents' names, death certificate numbers, and places of birth—to validate the identity of the individuals. According to SSA, prior efforts to add historical death data to non-beneficiary records were

¹⁶ SSA reviewed four of the five cases. For the four invalid beneficiary cases, we obtained death certificates and reviewed parents' names and places of birth to further validate the data. In these four cases, SSA's Enumeration Verification System validated the SSN provided by CSVRO; however, it was determined these individuals were alive. At least one case appears to involve identity theft. For the one invalid representative payee case, the Enumeration Verification System identified a unique SSN based on the name and date of birth provided by CSVRO. However, upon further review, SSA determined the SSN was not correct and the individual was alive.

¹⁷ Our analysis showed that 4,568 (59 percent) of the 7,756 records had a date of death before January 1, 1987.

challenging because of inconsistent and inaccurate data provided by participating States.¹⁸ Therefore, before recording CSVRO death information, SSA reported it must conduct extensive data analysis to confirm the identity of the individual. As previously noted, during this audit, we identified 5 invalid records and about 100,000 records for which we could not validate the SSN, name, and/or date of birth through SSA's Enumeration Verification System.

Resolving these cases would reduce SSA's exposure to future improper payments and improve the accuracy and completeness of the death information SSA maintains and shares with other Federal benefit-paying agencies.¹⁹

CONCLUSIONS

CSVRO death information was not always on SSA's records. As a result, we estimate SSA issued about \$1.9 million in benefits after death to 21 individuals who died in Connecticut from CYs 1979 through 2014. In addition, we identified three deceased individuals listed as representative payees who were issued \$173,690 in payments after death.

Although we found the CSVRO data were not completely accurate and SSA issued payments after death to a small number of beneficiaries who died in Connecticut, the cases we identified represent an opportunity for SSA to reduce payments after death and improve the completeness of its death information.

Before we issued this report, SSA suspended or terminated benefits, replaced deceased representative payees, and added death information to its records for some of the unrecorded deaths we brought to its attention. In addition, the Agency or OI continued reviewing the other outstanding death cases. Therefore, we made no recommendations for further corrective action.

AGENCY COMMENTS

SSA had no comments, see Appendix C.



Rona Lawson
Assistant Inspector General for Audit

¹⁸ SSA, OIG, *Numident Death Information Not Included on the Death Master File*, A-06-16-50069, Appendix B, page B-2 (September 2016).

¹⁹ Although SSA shares its death information with other Federal benefit-paying agencies, the other agencies should independently verify an individual's death before they take adverse action. Also, based on a January 2013 law, SSA is taking steps to improve the accuracy of its death information; *Improper Payments Elimination and Recovery Improvements Act of 2012*, Pub. L. No. 112-248, Sec. 5(g)(1), 126 Stat. 2390, p. 2396 (January 10, 2013).

APPENDICES

Appendix A – SCOPE AND METHODOLOGY

To complete our objective, we:

- Reviewed applicable sections of the *Social Security Act* and the Social Security Administration's (SSA) rules, policies, and procedures.
- Reviewed prior Office of the Inspector General (OIG) reports.
- Obtained from the Connecticut State Vital Records Office (CSVRO) a data file of more than 1 million individuals who had a date of death in the State from Calendar Years (CY) 1979 through 2014.
- Reformatted CSVRO death data to conduct matches against SSA records.
- Validated about 900,000 individuals' Social Security numbers (SSN), names, and dates of birth using SSA's Enumeration Verification System from the file of over 1 million individuals from CSVRO.¹
- Matched the approximately 900,000 validated CSVRO death records to SSA's current pay Old-Age, Survivors and Disability Insurance (OASDI) and Supplemental Security Income (SSI) records, as of July 2016. We identified 103 individuals whom Connecticut listed as deceased but appeared to be receiving OASDI benefits or SSI payments.
 - Through further analysis,² we narrowed our population from 103 to 21 individuals who were receiving benefits in 2017.

Table A–1: Deceased Individuals Matched to SSA's Current Pay Records by CY of Death

CY of Death	Number of Cases
1980-1990	1
1991-2000	4
2001-2010	7
2011-2014	9
TOTAL	21

- For these 21 cases, we
 - obtained Connecticut death certificates;
 - verified deaths by matching places of birth and parents' names;

¹ Validated records include CSVRO death records that agreed with SSA's records on name and SSN, or name, date of birth, and a different SSN.

² Our additional analysis showed that SSA added the death information to its records and/or the beneficiary was no longer collecting benefits.

- referred verified cases to our Office of Investigations for review;
 - referred to SSA cases the Office of Investigations determined (a) did not involve potential fraud, (b) payments after death did not meet prosecution thresholds, or (c) payments after death were still in the bank to which SSA had deposited the funds;
 - summarized overpayments posted by SSA; and
 - estimated payments after death for cases under review by SSA or our Office of Investigations as of December 2017.
- Matched the approximately 900,000 validated CSVRO death records to SSA's representative payee SSNs for OASDI and SSI beneficiaries in current pay as of July 2016. We identified three representative payees whom Connecticut listed as deceased in CYs 1979 to 2014. For these cases, we
 - verified the representative payee was still on the record as of 2017;
 - obtained Connecticut death certificates, as needed;
 - referred cases to SSA to review; and
 - summarized payments issued after death to representative payees.
- Matched the approximately 900,000 validated CSVRO death records to SSA's full file of death records as of March 2017.³ We identified 7,756 non-beneficiaries whom Connecticut listed as deceased with no death listed on SSA's Numident file. We referred these cases to SSA to analyze and take appropriate action.

We conducted our review from May through December 2017 in Boston, Massachusetts. The principal entities reviewed were the Offices of the Deputy Commissioners for Operations and Systems. Although we could only validate the names, dates of birth, or SSNs for about 900,000 of the 1 million CSVRO records and we identified five records with invalid data (as discussed in *Invalid Matches and Deaths Subsequently Posted* section of the report), we concluded the data were sufficiently reliable to meet our objective. 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 findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

³ Validated records are CSVRO death records that agreed with SSA's Enumeration Verification System records on SSN and name, or name, date of birth, and a different SSN.

Appendix B – SUMMARY OF PAYMENTS AFTER DEATH

When an individual is reported as deceased, the Social Security Administration (SSA) should terminate payments to Old-Age, Survivors and Disability Insurance (OASDI) beneficiaries and Supplemental Security Income (SSI) recipients.¹

Our match of Connecticut death data against SSA's records identified 21 beneficiaries who were paid about \$1.9 million in payments after death. See Table B-1.²

Table B-1: Payments After Death as of December 2017

Case	Payment Type	Date of Death	Months Paid After Death	Payments After Death		Payments After Death Recovered as of December 2017
				Actual	Estimated	
*1	OASDI	June 2005	141	\$101,210		\$0
2	OASDI	June 2007	122	89,760		780
3	OASDI	August 2007	119	66,890		590
4	OASDI	October 2005	141	64,440		0
5	OASDI	December 2013	43	57,680		14,830
6	SSI	May 2011	75	53,740		730
7	OASDI	October 2013	44	45,110		1,010
8	SSI	October 2013	45	32,810		23,520
9	SSI	March 2014	43	31,430		24,200
10	OASDI	November 2012	56	14,230		0
11	SSI	March 2014	28	10,950		0
12	SSI	June 2014	37	6,020		5,800
13	OASDI	July 2006	11	1,810		1,810
14	SSI	July 2013	49	1,470		30
**15	OASDI	October 2003			\$269,650	
**16	OASDI	May 2000			253,530	
**17	OASDI	December 1983			252,230	
*18	OASDI	December 1994			201,530	
*19	OASDI	December 2005			186,940	
*20	OASDI	August 1995			104,350	
**21	OASDI	October 1996			100,280	
TOTAL				\$577,550	\$1,368,510	\$73,300

* The Office of Investigations continued to review four cases.

** SSA continued to review four cases.

¹ 20 C.F.R. §§ 404.311(b) (2003), 404.316(b)(1) (2005), and 416.1334 (2015).

² We rounded to the nearest \$10 throughout this report. The \$577,550 in actual payments after death averaged \$41,250 paid over an average period of 68 months. The \$1.4 million in estimated payments after death averaged \$195,500 paid over an average period of 205 months.

Appendix C – AGENCY COMMENTS



SOCIAL SECURITY

MEMORANDUM

Date: December 18, 2017

Refer To: S1J-3

To: Gale S. Stone
Acting Inspector General

From: Stephanie Hall
Acting Deputy Chief of Staff

Subject: Office of the Inspector General Draft Report, "Match of Connecticut Death Information Against Social Security Records" (A-01-17-50248)--INFORMATION

Thank you for the opportunity to review the draft report. We have no 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.

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