



SOCIAL SECURITY

MEMORANDUM

Date: August 22, 2002

To: The Commissioner

From: Inspector General

Subject: The Social Security Administration Continues Assigning Original Social Security Numbers To Foreign-Born Individuals Who Present Invalid Evidentiary Documents (A-08-02-12056)

The attached final report presents the results of our audit. The objectives of the audit were to determine (1) the estimated number of original Social Security numbers the Social Security Administration (SSA) assigned to foreign-born individuals who presented invalid/inappropriate evidentiary documents and (2) whether SSA adequately addressed recommendations in our September 2000 report, *Procedures for Verifying Evidentiary Documents Submitted with Original Social Security Number Applications*.

Please comment within 60 days from the date of this memorandum on corrective action taken or planned on each recommendation. 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.



James G. Huse, Jr.

Attachment

**OFFICE OF
THE INSPECTOR GENERAL**

SOCIAL SECURITY ADMINISTRATION

**THE SOCIAL SECURITY ADMINISTRATION
CONTINUES ASSIGNING ORIGINAL SOCIAL
SECURITY NUMBERS TO FOREIGN-BORN
INDIVIDUALS WHO PRESENT INVALID
EVIDENTIARY DOCUMENTS**

August 2002 A-08-02-12056

AUDIT REPORT



Mission

We improve SSA programs and operations and protect them against fraud, waste, and abuse by conducting independent and objective audits, evaluations, and investigations. We provide timely, useful, and reliable information and advice to Administration officials, the Congress, and the public.

Authority

The Inspector General Act created independent audit and investigative units, called the Office of Inspector General (OIG). The mission of the OIG, as spelled out in the Act, is to:

- Conduct and supervise independent and objective audits and investigations relating to agency programs and operations.**
- Promote economy, effectiveness, and efficiency within the agency.**
- Prevent and detect fraud, waste, and abuse in agency programs and operations.**
- Review and make recommendations regarding existing and proposed legislation and regulations relating to agency programs and operations.**
- Keep the agency head and the Congress fully and currently informed of problems in agency programs and operations.**

To ensure objectivity, the IG Act empowers the IG with:

- Independence to determine what reviews to perform.**
- Access to all information necessary for the reviews.**
- Authority to publish findings and recommendations based on the reviews.**

Vision

By conducting independent and objective audits, investigations, and evaluations, we are agents of positive change striving for continuous improvement in the Social Security Administration's programs, operations, and management and in our own office.

Executive Summary

OBJECTIVE

The objectives of the audit were to determine (1) the estimated number of original Social Security numbers (SSN) the Social Security Administration (SSA) assigned to foreign-born individuals who presented invalid/inappropriate evidentiary documents and (2) whether SSA adequately addressed recommendations in our September 2000 report, *Procedures for Verifying Evidentiary Documents Submitted with Original Social Security Number Applications*.

BACKGROUND

One of the key elements SSA employs to administer the Nation's Social Security system is the SSN. The expanded use of the SSN and the ease with which individuals can counterfeit documents provide a motive and a method for individuals to improperly acquire an SSN. Once an individual obtains an SSN card, they can use it for a variety of illegal purposes, such as hiding their true identity. SSA issues almost 6 million original SSN cards each year, of which almost 2 million are issued through field offices (FO) and the remainder through the Enumeration-at-Birth process.

Our September 2000 report, *Procedures for Verifying Evidentiary Documents Submitted with Original Social Security Number Applications*, concluded SSA's controls did not prevent individuals from improperly obtaining SSNs with invalid/inappropriate evidentiary documents. To address improper SSN attainment, we recommended SSA employ preventative controls in its enumeration process, such as independently verifying all non-citizen evidentiary documents, before approving SSN applications. SSA responded that, while it shared our commitment to eliminating opportunities for SSN fraud, management believed long-term system enhancements, rather than independent verifications of evidentiary documents, would provide the most benefit.

SSA refers to the process of assigning original SSNs as enumeration. When an individual not enumerated through the Enumeration-at-Birth process applies for an original SSN, he or she must complete, sign, and submit an *Application for a Social Security Card* (Form SS-5) to an SSA FO. SSA requires each applicant to provide acceptable documentary evidence of (1) age, (2) identity, and (3) U.S. citizenship or lawful alien status. Foreign-born applicants must also show evidence of U.S. citizenship, work-authorized lawful alien status, or current documentation of eligibility for a federally funded benefit or service. After FO personnel review the Form SS-5 and determine the validity of supporting evidentiary documents, they certify and enter applicant information into SSA's Modernized Enumeration System (MES). Once certified, the SSN application undergoes numerous automated edits to validate applicant information. If the application passes these edits, SSA systems assign an SSN, issue an SSN card, and establish and/or update SSA's master files.

To determine the estimated number of original SSNs the Agency assigned to foreign-born individuals who presented invalid/inappropriate evidentiary documents, we obtained a data extract from SSA's MES Transaction History File for Calendar Year (CY) 2000. From this extract, we identified a population of 1,266,767 work-authorized individuals to whom SSA assigned original SSNs. We then randomly selected and reviewed a sample of 250 records. For each of the sampled SSNs, we verified the foreign-born individual's immigration status at the time of the application with the Immigration and Naturalization Service (INS) or the Department of State (DoS) to determine the applicant's eligibility for an SSN. We provided INS and DoS with a description of the evidence FO personnel recorded on the SSN application. To determine whether SSA adequately addressed recommendations made in our September 2000 report, we reviewed actions SSA had taken to address our findings. We reviewed current enumeration policy and procedures, interviewed SSA personnel responsible for coordinating enumeration-related issues with other Federal agencies, and obtained updates on MES enhancements.

This report serves as a follow-up review and addresses our previous recommendations made to improve the integrity of SSA's enumeration process.

RESULTS OF REVIEW

We estimate SSA assigned 96,274 original SSNs to foreign-born individuals who presented invalid/inappropriate INS documents in CY 2000. This figure represents 8 percent of the 1.2 million original SSNs the Agency assigned to foreign-born, work-authorized individuals during this period. INS either had no record of these individuals or INS' records did not agree with the evidentiary documents presented to SSA. In either case, based on our verifications with INS, SSA should not have assigned these SSNs. We estimate 42 percent of the individuals to whom SSA improperly assigned SSNs had earnings posted to their accounts. We found no earnings posted to SSA records for the remaining individuals. Although we do not know how these individuals used the SSNs, we previously reported that individuals who improperly obtain SSNs often use them to commit various illegal activities. With increased occurrences of identity fraud crimes in recent years and the rising importance of homeland security, we believe improperly assigning 1 of every 13 SSNs to foreign-born individuals is unacceptable, and SSA must make immediate changes in its enumeration process.

We acknowledge SSA's progress toward implementing recommendations we made in our September 2000 report, *Procedures for Verifying Evidentiary Documents Submitted with Original Social Security Number Applications*. We also recognize it has been less than 2 years since we issued this report. However, our current review indicates SSA has not adequately addressed all of the recommendations. We believe the corrective actions we suggested are paramount to ensuring SSN integrity. Of our six prior audit recommendations, SSA adequately addressed two, elected not to implement one, and did not adequately address three others. First, SSA still does not independently verify with the issuing Agency *all* non-citizen evidentiary documents before assigning SSNs,

although SSA's Commissioner has committed to doing so in the near future. SSA has provided its FOs manual access to DoS' Refugee Data Center. Additionally, SSA has provided FOs with on-line access to INS' Non-immigrant Information System (NIIS). SSA plans to phase in its use at all FOs by September 2002. Second, SSA has not implemented an Enumeration at Entry program, even though the Agency is working with INS and DoS to begin its initial phase. Third, SSA has not implemented systems controls that would interrupt SSN assignment in suspicious situations, although the Agency has taken steps toward designing such controls. We believe further implementation delays will only impede SSA's ability to prevent improper attainment of SSNs.

CONCLUSION AND RECOMMENDATIONS

Failure to protect the SSN's integrity can have enormous consequences for our Nation and its citizens. Now more than ever, SSA must be particularly cautious in striking a balance between customer service and SSN integrity. We recognize that increased SSN integrity measures will impact the time necessary to process original SSN applications. However, given the large number of SSNs the Agency assigned to foreign-born individuals who presented invalid/inappropriate INS documents, we believe SSA should immediately employ preventative controls in its enumeration process. Failure to do so seriously compromises SSN integrity, which, ultimately, could impact our homeland security. Accordingly, we recommend that SSA:

- Continue its plan to expeditiously implement our prior audit recommendation to obtain independent verification of all non-citizen evidentiary documents before issuing SSNs.
- Expedite our prior audit recommendation to implement systems controls that would interrupt SSN assignment when SSA mails multiple cards to common addresses or when parents claim an improbable large number of children.

AGENCY COMMENTS

SSA stated our findings and conclusions were based on a review of SSNs issued before SSA's Enumeration Task Force undertook various enumeration initiatives related to the terrorist attacks of September 11, 2001. SSA also stated that SSNs assigned in the period covered by the review were not subjected to the same scrutiny as SSNs assigned in the months following the attacks. Additionally, SSA plans to open Enumeration Centers in several large metropolitan areas to ensure only qualified individuals with valid documents will receive SSN cards.

In its response to Recommendation 1, SSA agreed to expeditiously implement our prior audit recommendation to obtain independent verification of all non-citizen evidentiary documents before issuing SSNs. SSA stated it has already initiated verification of INS documents and is committed to full collateral verification by September 1, 2002.

Regarding Recommendation 2, the Agency stated it remains committed to the long-term fraud initiatives that would interrupt SSN assignment when SSA mails multiple cards to common addresses or when parents claim an improbably large number of children. The Agency responded it has not implemented systems controls because such enhancements are a complex and difficult undertaking, and its resources have been used for post-September 11 enumeration initiatives.

SSA also provided technical comments that we considered and incorporated, where appropriate. The full text of SSA's comments is included in Appendix E.

OFFICE OF THE INSPECTOR GENERAL RESPONSE

We believe the Agency's response and planned actions adequately address Recommendation 1. We acknowledge the steps SSA has taken to strengthen the integrity of the enumeration process and recognize the Agency's heightened awareness of proper SSN assignment. We also recognize that our audit period was before the Agency undertook various enumeration initiatives in response to the September terrorist attacks. We believe full collateral verification, once implemented in all FOs, should significantly improve the integrity of the enumeration process. We plan to assess the effectiveness of the changes the Agency has made since September 11, 2001 in Fiscal Year 2003.

Regarding SSA's response to Recommendation 2, we acknowledge SSA's commitment to the long-term fraud initiatives and understand the complexity involved in creating databases to evaluate relationships that current systems cannot assess. However, we continue to believe further implementation delays will only impede SSA's ability to prevent improper SSN attainment. Therefore, we encourage SSA to commit the necessary resources to expedite implementation of the systems enhancements we recommended.

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Acronyms

ASVI	Alien Status Verification Index
CY	Calendar Year
DoS	Department of State
FO	Field Office
GAO	General Accounting Office
I-94	Arrival/Departure Record
INS	Immigration and Naturalization Service
MES	Modernized Enumeration System
NIIS	Non-immigrant Information System
POMS	Program Operations Manual System
SAVE	Systematic Alien Verification for Entitlements
SS-5	Application for a Social Security Card
SSA	Social Security Administration
SSN	Social Security Number

Introduction

OBJECTIVE

The objectives of the audit were to determine (1) the estimated number of original Social Security numbers (SSN) the Social Security Administration (SSA) assigned to foreign-born individuals who presented invalid/inappropriate evidentiary documents¹ and (2) whether SSA adequately addressed recommendations we made in our September 2000 report, *Procedures for Verifying Evidentiary Documents Submitted with Original Social Security Number Applications.*²

BACKGROUND

One of the key elements SSA employs to administer the Nation's Social Security system is the SSN.³ The expanded use of the SSN and the ease with which individuals can counterfeit documents provide a motive and a method for individuals to improperly acquire an SSN. Once an individual obtains an SSN card, they can use it for a variety of illegal purposes, such as hiding their true identity. SSA issues almost 6 million original SSN cards each year, of which almost 2 million are issued through field offices (FO) and the remainder through the Enumeration-at-Birth process.

Our September 2000 report found SSA's controls did not prevent individuals from improperly obtaining SSNs with invalid/inappropriate evidentiary documents. To address improper SSN attainment, we recommended SSA employ preventative controls in its enumeration process, such as independently verifying all non-citizen evidentiary documents, before approving SSN applications. SSA responded that, while it shared our commitment to eliminating opportunities for SSN fraud, management believed long-term system enhancements, rather than independent verifications of evidentiary documents, would provide the most benefit.

This report serves as a follow-up review and addresses our previous recommendations made to improve the integrity of SSA's enumeration process.

¹ We define invalid/inappropriate evidentiary documents as those for which either the Immigration and Naturalization Service (INS) had no record of an individual's entry into the United States or INS' records did not agree with documents the individual presented to SSA. For the latter, individuals either presented SSA with INS documents that *improperly* showed them as work-authorized or authorized to remain in the country.

² [Http://www.ssa.gov/oig/adobepdf/A-08-98-41009.pdf](http://www.ssa.gov/oig/adobepdf/A-08-98-41009.pdf).

³ See 42 U.S.C. 405(c)(2)(B)(i).

How SSA Verifies Evidentiary Documents and Assigns Original SSNs

SSA refers to the process of assigning original SSNs as enumeration.⁴ When an individual not enumerated through the Enumeration-at-Birth process applies for an original SSN, he or she must complete, sign, and submit an *Application for a Social Security Card* (Form SS-5) to an SSA FO.⁵ SSA requires each applicant to provide acceptable documentary evidence of (1) *age*, (2) *identity*, and (3) *U.S. citizenship or lawful alien status*.⁶ Foreign-born applicants must also show evidence of U.S. citizenship, work-authorized lawful alien status, or current documentation of eligibility for a federally funded benefit or service.⁷ Appendix A contains specific evidentiary requirements for foreign-born individuals.

FO personnel can verify documents (1) through visual inspection, including use of a black light where appropriate, and/or (2) with the issuing Agency through on-line or manual verification.⁸ If an immigrant has been in the United States for 30 days or longer and the Immigration and Naturalization Service (INS) has assigned them an alien registration number, SSA requires FO personnel to verify the validity of INS documents via INS' Alien Status Verification Index (ASVI).⁹ If ASVI shows no record of the immigrant, then FO personnel complete a paper form (G-845) and mail it to INS for verification. Although ASVI has not historically provided FOs timely information, INS is working toward improving its Systematic Alien Verification for Entitlements (SAVE)¹⁰ program's timeliness. If an immigrant has been in the United States less than 30 days, SSA policy does not require FO personnel to verify documents with INS.¹¹

After FO personnel review the SS-5 and determine the validity of supporting evidentiary documents, they certify and enter applicant information into SSA's Modernized Enumeration System (MES). Once certified, the SSN application undergoes numerous automated edits to validate applicant information. If the application passes these edits,

⁴ The enumeration process also includes SSA issuing replacement cards to people with existing numbers and verifying SSNs for employers and other Federal agencies. *Program Operations Manual System* (POMS), sections RM 00202.030 and TC 31001.090.

⁵ POMS, section RM 00202.001 A.

⁶ POMS, section RM 00203.001 C.

⁷ Id.

⁸ POMS, sections GN 00303.400 C. and RM 00203.740.

⁹ POMS, section RM 00203.740; INS' ASVI is a nationally accessible database of selected immigration status information.

¹⁰ INS' SAVE program enables Federal agencies to obtain information from this database, either on-line or manually.

¹¹ SSA Policy Instruction BOS 02-007 GS (March 19, 2002).

SSA systems assign an SSN, issue an SSN card, and establish and/or update SSA's master files.¹²

Foreign-born Individuals Entering the United States

Foreign-born individuals enter the United States as U.S. citizens, immigrants or nonimmigrants. Immigrants are commonly admitted as permanent lawful residents to whom INS issues *Alien Registration Receipt Cards*. These documents include an alien registration number SSA can verify through INS' SAVE program. Nonimmigrants are temporary residents whom INS grants limited stay in the United States for a specific purpose, such as foreign Government officials, students, temporary workers, and exchange visitors. All non-citizens legally entering the United States complete INS' *Arrival/Departure Record* (I-94). INS places an admission stamp on the I-94 then initials, dates, and, for nonimmigrants, hand writes their admission class on the document. Depending on the class of admission, INS permits some nonimmigrants to work while they are in the United States. As such, SSA personnel must review INS' "admission classifications" to determine whether nonimmigrants are eligible for an SSN.

SCOPE AND METHODOLOGY

To determine the estimated number of original SSNs the Agency assigned to foreign-born individuals who presented invalid/inappropriate evidentiary documents, we obtained a data extract from SSA's MES Transaction History File for Calendar Year (CY) 2000. From this extract, we identified a population of 1,266,767 work-authorized individuals to whom SSA assigned original SSNs. We then randomly selected and reviewed a sample of 250 records (Appendix B). For each of the sampled SSNs, we verified the foreign-born individual's immigration status at the time of the application with the Immigration and Naturalization Service (INS) or the Department of State (DoS) to determine the applicant's eligibility for an SSN. We provided INS and DoS with a description of the evidence FO personnel recorded on the SSN application. While we made every attempt to verify the documented evidence descriptions with INS and DoS, we did not determine the reliability of the information systems at these agencies.

To determine whether SSA adequately addressed recommendations in our September 2000 report, we reviewed actions SSA had taken to address our findings. We reviewed current enumeration policy and procedures, interviewed SSA personnel responsible for coordinating enumeration-related issues with other Federal agencies, and obtained updates on MES enhancements.

SSA entities audited were the Offices of Program Benefits under the Deputy Commissioner for Disability and Income Security Programs and Systems Analysis under the Deputy Commissioner for Systems. We conducted our work from December 2001 through April 2002 in accordance with generally accepted government auditing standards.

¹² The NUMIDENT file houses records of original and replacement SSN cards issued over an individual's lifetime, as well as identifying information such as date of birth, place of birth, and parent's names.

Results of Review

We estimate SSA assigned 96,274 original SSNs to foreign-born individuals who presented invalid/inappropriate INS documents in CY 2000. This figure represents 8 percent of the 1.2 million original SSNs the Agency assigned to foreign-born, work-authorized individuals during this period. Either INS had no record of these individuals or INS' records did not agree with the evidentiary documents presented to SSA. In either case, based on our verifications with INS, SSA should not have assigned these SSNs. We estimate 42 percent of the individuals to whom SSA improperly assigned SSNs had earnings posted to their accounts. We found no earnings posted to SSA records for the remaining individuals. Although we do not know how these individuals used the SSNs, we previously reported that individuals who improperly obtain SSNs often use them to commit various illegal activities.¹³ With increased occurrences of identity fraud crimes in recent years and the rising importance of homeland security, we believe improperly assigning 1 of every 13 SSNs to foreign-born individuals is unacceptable, and SSA must make immediate changes in its enumeration process.

We acknowledge SSA's progress toward implementing recommendations we made in our September 2000 report, *Procedures for Verifying Evidentiary Documents Submitted with Original Social Security Number Applications*. We also recognize it has been less than 2 years since we issued this report. However, our current review indicates SSA has not adequately addressed all of the recommendations. We believe the corrective actions we suggested are paramount to ensuring SSN integrity. Of our six prior audit recommendations, SSA adequately addressed two, elected not to implement one, and did not adequately address three others. First, SSA still does not independently verify with the issuing Agency *all* non-citizen evidentiary documents before assigning SSNs, although SSA's Commissioner has committed to doing so in the near future. SSA has provided its FOs manual access to DoS' Refugee Data Center. Additionally, SSA has provided FOs with on-line access to INS' Non-immigrant Information System (NIIS).¹⁴ SSA plans to phase in its use at all FOs by September 2002. Second, SSA has not implemented an Enumeration at Entry program, although the Agency is working with INS and DoS to begin its initial phase. Third, SSA has not implemented systems controls that would interrupt SSN assignment in suspicious situations, although the Agency has taken steps toward designing such controls. We believe further implementation delays will only impede SSA's ability to prevent improper attainment of SSNs.

¹³ *Social Security Number Integrity: An Important Link in Homeland Security* (A-08-02-22077), May 2002, and *Using Social Security Numbers to Commit Fraud* (A-08-99-42002), May 1999.

¹⁴ INS' NIIS provides automation support for tracking non-immigrant foreign nationals arrivals and departures.

SSA CONTINUES TO ASSIGN ORIGINAL SSNs TO FOREIGN-BORN INDIVIDUALS BASED ON INVALID/INAPPROPRIATE INS DOCUMENTS

SSA Assigned About 100,000 SSNs in CY 2000 Based on Invalid/Inappropriate INS Documents

Of the 1.2 million SSNs SSA assigned in CY 2000 to foreign-born, work-authorized individuals, we estimate SSA assigned 96,274 SSNs (8 percent) based on invalid/inappropriate evidentiary documents (Appendix B). These SSN applicants presented SSA with invalid/inappropriate INS documents to provide evidence of their age, identity, and work

authorization or legal alien status. Thus, based on our verifications with INS, SSA should not have assigned these SSNs. We believe the following examples illustrate SSA's vulnerability to non-citizens who improperly obtain SSNs with invalid/inappropriate evidentiary documents.

INS Had No Record of Individuals' Entries into the United States

We estimate SSA assigned 76,006 (79 percent) of the 96,274 SSNs to individuals for whom INS had no record of their entries into the United States. Following are some examples from our review.

- SSA assigned SSNs to two individuals (both age 28) purporting to have been born in India. These individuals provided documents improperly showing them as work-authorized; however, INS had no records of the two individuals.
- SSA assigned SSNs to alleged students (ages 16 and 19) purporting to have been born in Pohnpei, which is in the Federated States of Micronesia. However, INS had no records of the two individuals.
- SSA assigned SSNs to three individuals (ages 27, 31, and 39) purporting to have been born in Mexico. These individuals provided documents improperly showing them as work-authorized; however, INS had no records of the three individuals.

INS' Records Did Not Agree with Documents the Individuals' Presented to SSA

We estimate SSA assigned 20,268 (21 percent) of the 96,274 SSNs to individuals for whom INS' records did not agree with the evidentiary documents presented to SSA. Following are some examples from our review.

- SSA assigned an SSN to a 27-year-old male purporting to have been born in Japan. He presented a work-authorized document to SSA, although INS never authorized him to work. Specifically, he presented an INS document indicating he was an intra-company transferee and therefore eligible for a work-authorized SSN. However, INS reported to us that he was actually the spouse of an intra-company transferee and therefore was not eligible for a work-authorized SSN.

- SSA assigned an SSN to a 56-year-old female purporting to have been born in Mexico. She presented a work-authorized document. However, INS had *not* authorized her to remain in the country. She originally entered the country with an “H2-B” classification (temporary worker performing services of labor unavailable in the United States). She applied for an SSN on December 20, 2000, with INS documents indicating her H2-B status. Therefore, SSA assigned the individual an SSN. Nevertheless, INS confirmed that her authorization to remain in the United States had expired December 1, 2000, and INS found no indication that she had applied for an extension. Accordingly, the document she presented to the SSA FO when applying for an SSN was invalid/inappropriate.

We estimate 42 percent of the individuals to whom SSA improperly assigned SSNs had earnings posted to their accounts. We found no earnings posted to SSA records for the remaining individuals. Although we do not know how these individuals used the SSNs, we have previously reported that individuals who improperly obtain SSNs often use them to commit various illegal activities. We referred the improperly assigned SSNs identified during the audit to our Office of Investigations.

In addition, the General Accounting Office (GAO) addressed the use of improperly obtained SSNs in recent testimony regarding the challenges facing SSA.¹⁵ GAO stated that the terrorist attacks of September 11, 2001 and the indication that some of the terrorists improperly obtained SSNs have added new urgency to the need to assess how SSNs are used and protected. Also, given the widespread use of SSNs, GAO believes the Agency needs to take steps to ensure it is taking all necessary precautions to prevent individuals who are not entitled to SSNs from obtaining them. GAO pointed out that this may require the Agency to find a new balance between two competing goals: (1) the need to take time to verify documents submitted during the application process and (2) the desire to serve the applicant as quickly as possible.

SSA HAS TAKEN STEPS TO IMPROVE SSN INTEGRITY BUT HAS NOT ADEQUATELY ADDRESSED PRIOR RECOMMENDATIONS

We acknowledge SSA’s progress toward implementing recommendations we made in our September 2000 report, *Procedures for Verifying Evidentiary Documents Submitted with Original Social Security Number Applications*. We also recognize it has been less than 2 years since we issued our prior report. However, our current review indicates SSA has not adequately addressed all of the recommendations. Given the large number of SSNs the Agency may have improperly assigned in CY 2000 and potential homeland security concerns, we believe SSA must expeditiously implement these recommendations. Implementation may impact the amount of time necessary to process original SSN applications and require assistance from INS and DoS. However, we believe these actions are paramount to ensuring SSN integrity.

¹⁵ Testimony on May 2, 2002, before the Subcommittee on Social Security, Committee on Ways and Means, House of Representatives, *Social Security Administration: Agency Must Position Itself Now to Meet Profound Challenges* (GAO-02-289T).

Of our six prior audit recommendations, SSA adequately addressed two, elected not to implement one, and did not adequately address three others (Appendix C). First, SSA still does not independently verify with the issuing Agency *all* non-citizen evidentiary documents before assigning SSNs, although SSA's Commissioner recently indicated her intention to implement our recommendation in the near future. We applaud the Commissioner's decision and believe this action will considerably improve the integrity of SSA's enumeration process. Without such measures, the Agency will remain at-risk to improper SSN attainment. SSA has taken steps to expand document verification by providing its FOs manual access to DoS' Refugee Data Center. Additionally, SSA has provided FOs on-line access to INS' NIIS. SSA plans to phase in its use at all FOs by September 2002.

Second, SSA has not yet implemented an Enumeration at Entry program. SSA is working with INS and DoS to implement the initial phase of the Enumeration at Entry program, which would reduce the probability of SSA improperly assigning SSNs to immigrants. While we recognize the significant coordination and resource commitments required to implement Enumeration at Entry, we are concerned implementation time frames are too fluid.

Third, SSA has not implemented planned MES controls that would interrupt SSN assignment in suspicious situations. We understand SSA needs sufficient time and planning to implement the controls we recommended. SSA is developing a control that will detect claims of an improbably large number of children. However, SSA does not plan to release the software for this control until early 2003. Furthermore, SSA has delayed development of a control that would detect multiple SSN cards going to common addresses. We believe further implementation delays will only impede SSA's ability to prevent improper attainment of SSNs.

In response to the events of September 11, 2001, SSA formed an executive level Enumeration Task Force to explore and track the Agency's progress toward completing of policy and procedural initiatives to further enhance the SSN's integrity. We acknowledge the importance and value of these initiatives in preventing and detecting SSN misuse. Of the eight Task Force initiatives, SSA has implemented three, and five are on-going. The status of these initiatives is detailed in Appendix D. The Task Force initiatives are as follows:

- provide refresher training on enumeration policy and procedures, with emphasis on enumerating non-citizens, for all involved staff;
- convene a joint task force between SSA, INS, DoS, and the Department of Health and Human Services' Office of Refugee Resettlement to resolve issues involving enumeration of non-citizens, including working out procedures for verifying INS documents before SSN issuance;
- eliminate driver's licenses as a reason for a nonwork number;

- provide an alternative to distributing a NUMIDENT printout for SSN verification;
- lower the age tolerance from 18 to 12 for mandatory interview procedures, including verification of birth records before enumeration for all applicants age 1 and older for original SSNs and require evidence of identity for all children, regardless of age;
- determine the feasibility of photocopying (or scanning) all documentary evidence submitted with SSN applications;
- change the MES to provide an electronic audit trail, regardless of the mode used to process SSN applications; and
- implement the SSN Verification System.

Conclusions and Recommendations

Failure to protect the SSN's integrity can have enormous consequences for our Nation and its citizens. Now, more than ever, SSA must be particularly cautious in striking a balance between customer service and SSN integrity. We recognize that increased SSN integrity measures will impact the time necessary to process original SSN applications. However, given the large number of SSNs the Agency assigned to foreign-born individuals who presented invalid/inappropriate INS documents, we believe SSA should immediately employ preventative controls in its enumeration process. Failure to do so seriously compromises SSN integrity, which, ultimately, could impact our homeland security. Accordingly, we recommend that SSA:

1. Continue its plan to expeditiously implement our prior audit recommendation to obtain independent verification of all non-citizen evidentiary documents before issuing SSNs.
2. Expedite our prior audit recommendation to implement systems controls that would interrupt SSN assignment when SSA mails multiple cards to common addresses or when parents claim an improbably large number of children.

AGENCY COMMENTS

SSA stated our findings and conclusions were based on a review of SSNs issued before SSA's Enumeration Task Force undertook various enumeration initiatives related to the terrorist attacks of September 11, 2001. SSA also stated that SSNs assigned in the period covered by the review were not subjected to the same scrutiny as SSNs assigned in the months following the attacks. Additionally, SSA plans to open Enumeration Centers in several large metropolitan areas to ensure only qualified individuals with valid documents will receive SSN cards.

In its response to Recommendation 1, SSA agreed to expeditiously implement our prior audit recommendation to obtain independent verification of all non-citizen evidentiary documents before issuing SSNs. SSA stated it has already initiated verification of INS documents and is committed to full collateral verification by September 1, 2002.

Regarding Recommendation 2, the Agency stated it remains committed to the long-term fraud initiatives that would interrupt SSN assignment when SSA mails multiple cards to common addresses or when parents claim an improbably large number of children. The Agency responded it has not implemented systems controls because such enhancements are a complex and difficult undertaking, and its resources have been used for post-September 11 enumeration initiatives.

SSA also provided technical comments that we considered and incorporated, where appropriate. The full text of SSA's comments is included in Appendix E.

OFFICE OF THE INSPECTOR GENERAL RESPONSE

We believe the Agency's response and planned actions adequately address Recommendation 1. We acknowledge the steps SSA has taken to strengthen the integrity of the enumeration process and recognize the Agency's heightened awareness of proper SSN assignment. We also recognize that our audit period was before the Agency undertook various enumeration initiatives in response to the September terrorist attacks. We believe full collateral verification, once implemented in all FOs, should significantly improve the integrity of the enumeration process. We plan to assess the effectiveness of the changes the Agency has made since September 11, 2001 in Fiscal Year 2003.

Regarding SSA's response to Recommendation 2, we acknowledge SSA's commitment to the long-term fraud initiatives and understand the complexity involved in creating databases to evaluate relationships that current systems cannot assess. However, we continue to believe further implementation delays will only impede SSA's ability to prevent improper SSN attainment. Therefore, we encourage SSA to commit the necessary resources to expedite implementation of the systems enhancements we recommended.

Appendices

Appendix A

Evidentiary Requirements: Foreign-Born Individuals Applying for Original Social Security Numbers

The Social Security Administration's *Program Operations Manual System* (POMS) cites that applicants for an original Social Security number must establish their *age*, *identity*, and *U.S. citizenship or lawful alien status*.¹ Policy also dictates that at least two documents are necessary to meet these evidentiary requirements.² Below is a brief description of the evidentiary requirements for foreign-born individuals.

Evidence of Age: To establish age, applicants must submit a document, at least 1 year old, that shows the applicant's name and date of birth or age. Common examples of documents used to establish age are a foreign birth certificate, passport, or Immigration and Naturalization Service (INS) record.³

Evidence of Identity: To establish identity, applicants must provide a document that is of recent issuance and was established at a later time and for a different purpose than a birth record.⁴ The most common identity documents foreign-born applicant's use to establish their identity are passports and/or INS documents.

Evidence of Work-Authorized or Lawful Alien Status: To establish lawful alien status and/or the INS-granted work authorization, applicants must present an INS document.⁵ The *Alien Registration Receipt Card* (I-551) establishes non-citizens as lawfully admitted for permanent residence in the United States.⁶ Other INS documents, such as the I-94, *Arrival/Departure Record*, or the I-688B, *Employment Authorization Document*, determine work authorization for nonimmigrants.⁷

¹ POMS, sections RM 00203.001 and RM 00203.200 A.

² POMS, section RM 00203.020.

³ POMS, section RM 00203.110.

⁴ POMS, section RM 00203.200.

⁵ POMS, section RM 00203.400.

⁶ POMS, section RM 00203.410.

⁷ POMS, section RM 00203.500.

Sample Methodology and Appraisal

We obtained a data extract from the Social Security Administration's (SSA) Modernized Enumeration System Transaction History File for Calendar Year 2000. From this extract, we identified a population of 1,266,767 (1.2 million) work-authorized individuals to whom SSA assigned original Social Security numbers (SSN). We then randomly selected and reviewed a sample of 250 records.

For each of the sampled SSNs, we verified the foreign-born individual's immigration status at the time of the application with the Immigration and Naturalization Service (INS) or the Department of State (DoS) to determine the applicant's eligibility for an SSN. We provided INS and DoS a description of the evidence field office personnel recorded on the SSN application. For foreign-born U.S. citizens, we verified the *Report of Birth Abroad* with the DoS. For non-citizens, we verified the alien registration number via INS' Alien Status Verification Index (ASVI) database. Additionally, we manually verified with INS those records where (1) ASVI displayed exceptions, (2) the applicant provided SSA with INS' *Arrival/Departure Record*, or (3) SSA failed to record an evidence description on the application. Table B.1 shows our sample size, results, and appraisal.

Table B.1: Sample Appraisal

ESTIMATE OF ORIGINAL SSNs SSA ASSIGNED TO FOREIGN-BORN INDIVIDUALS WHO PRESENTED INVALID/INAPPROPRIATE EVIDENTIARY DOCUMENTS	
Total population of foreign-born work-authorized individuals	1,266,767
Sample size	250
Number of instances in sample where SSA assigned SSNs to individuals who presented invalid/inappropriate evidentiary documents	19
Estimate of instances in population where SSA assigned SSNs to individuals who presented invalid/inappropriate evidentiary documents	96,274
<i>Confidence Level:</i> We are 90-percent confident that the actual number of instances where SSA assigned an original SSN to foreign-born, work-authorized individuals who presented invalid/inappropriate evidentiary documents is between 63,767 and 138,738.	

Status of Prior Office of the Inspector General Report Recommendations¹

RECOMMENDATION 1

Obtain independent verification from the issuing Agency for all non-citizen evidentiary documents before approving the respective Social Security number (SSN) applications, until the Enumeration at Entry program is implemented.

Social Security Administration (SSA) Actions

- SSA has provided its field offices (FO) manual access to the Department of State's (DoS) Refugee Data Center.
- SSA has provided FOs with on-line access to the Immigration and Naturalization Service's (INS) Non-immigrant Information System (NIIS). SSA plans to phase in its use at all FOs by September 2002.
- SSA intends to begin verifying all INS documents presented at certain FOs in July 2002 and at all FOs by September 2002.

Evaluation of SSA Actions

SSA has not adequately addressed this recommendation because it still is not independently verifying *all* non-citizen evidentiary documents with the issuing agency before assigning SSNs.

RECOMMENDATION 2

Accelerate negotiations with the INS and the DoS to implement the Enumeration at Entry program. Once implemented, all non-citizens should be required to obtain their SSNs by applying at one of these Agencies.

¹ Status as of June 12, 2002.

SSA Actions

SSA, INS, and DoS plan to begin the initial phase of the Enumeration at Entry program in October 2002. After testing, DoS will begin transmitting data to INS from three Foreign Service Posts. Enumeration at Entry will initially include only those immigrants who enter the United States as lawful permanent residents and who are age 18 or older.

Evaluation of SSA Actions

SSA has not adequately addressed this recommendation. While we recognize the significant coordination and resource commitments required to implement Enumeration at Entry, we are concerned the timelines for implementation are too fluid.

RECOMMENDATION 3

Give credit for fraud detection and development in measuring the performance of FOs and their employees.

SSA Actions

SSA gives FOs credit in their office workload reports for fraud referrals to the Office of the Inspector General.

Evaluation of SSA Actions

SSA has adequately addressed this recommendation.

RECOMMENDATION 4

Continue efforts and establish an implementation date for planned system controls that will interrupt SSN assignment when multiple cards are mailed to common addresses not previously determined to be legitimate recipients (for example, charitable organizations) and/or when parents claim to have had an improbably large number of children.

SSA Actions

- SSA is developing a control that will detect claims of an improbably large number of children. SSA does not plan to release the software for this control until early 2003.
- SSA has delayed development of a control that would detect multiple cards going to common addresses.

Evaluation of SSA Actions

SSA has not adequately addressed this recommendation. While we recognize the significant resource commitments required to design, test, and implement system improvements, we are concerned that project timelines are too flexible.

RECOMMENDATION 5

Study the impact of requiring SSN applicants to either provide an actual street address (that is, do not accept post office boxes) or pick up their SSN at the closest SSA FO.

SSA Actions

SSA analyzed this issue and concluded that this requirement would target and treat unfairly legitimate users of post office boxes and cause undue hardship for those living in rural areas or for those with unreliable modes of transportation.

Evaluation of SSA Actions

SSA has adequately addressed this recommendation.

RECOMMENDATION 6

Propose legislation that disqualifies individuals who improperly attain SSNs from receiving work credits for periods that they were not authorized to work or reside in the United States.

SSA Actions

SSA maintains that such legislation would be difficult to administer; therefore, the Agency has not taken action on this recommendation.

Evaluation of SSA Actions

SSA elected not to implement this recommendation. We maintain the recommendation would not be difficult to administer since it would be the number holder's responsibility to amend the SSN record if he or she subsequently became eligible to reside and/or work in the United States. Since SSA management is ultimately responsible for this decision, we will not reiterate this recommendation. SSA has modified its policy to eliminate driver's licenses as a reason to obtain a nonwork SSN, effective March 1, 2002. This policy change should reduce work credits for individuals not authorized to work.

Appendix D

Status of the Social Security Administration's Enumeration Task Force Initiatives¹

RECOMMENDATION	STATUS
1. Provide refresher training on enumeration policy and procedures, with emphasis on enumerating non-citizens, for all involved staff.	On-going. In December 2001, the Social Security Administration (SSA) provided enumeration refresher training to field office (FO) staff and managers. SSA followed up this training with a management review of Social Security numbers (SSN) assigned to foreign-born individuals during 1 week in February 2002 that focused on procedural improvements in FOs. SSA plans to conduct training again during the summer of 2002.
2. Convene a joint task force between SSA, the Immigration and Naturalization Service (INS) and the Department of State (DoS) to resolve issues involving enumeration of non-citizens, including working out procedures for verifying INS documents before SSN issuance.	On-going. In November 2001, SSA, along with INS, DoS, and the Department of Health and Human Services' Office of Refugee Resettlement formed an interagency task force to expedite verifying non-citizen evidentiary documents presented to SSA by providing SSA increased on-line access. In February 2002, SSA began confirming an applicant's alleged refugee status with the DoS' Refugee Data Center. On May 25, 2002, SSA provided FOs with on-line access to INS' Non-immigrant Information System (NIIS). SSA plans to phase in its use at all FOs by September 2002. SSA intends to begin verifying all INS documents presented at rural FOs in July 2002 and at metropolitan FOs in September 2002. In October 2002, SSA, INS, and DoS plan to begin the initial phase of the Enumeration at Entry program.
3. Eliminate driver's licenses as a reason for a nonwork number.	Completed. Effective March 2002, SSA's policy eliminated driver's licenses as a reason to obtain a nonwork SSN.

¹ Status as of June 12, 2002.

RECOMMENDATION	STATUS
4. Provide an alternative to giving out a Numident printout for SSN verification.	Completed. On March 4, 2002, SSA FOs began using the Agency's new printout (NUMI-lite) that enables verification of an individual's SSN while providing minimal identity information.
5. Lower the age tolerance from age 18 to age 12 for mandatory interview procedures, including verification of birth records prior to enumeration for all applicants for original SSNs and require evidence of identity for all children, regardless of age.	On-going. SSA is drafting regulatory changes that would require (1) mandatory interviews for all individuals over age 12 who apply for an original SSN and (2) identity documents for children under age 7. Effective June 1, 2002, FOs began verifying birth records of all applicants who are applying for an original SSN and are over age 1. SSA is planning a national pilot, with selected offices in the summer of 2002, to verify birth records for those children under age 1.
6. Determine the feasibility of photocopying (or scanning) all documentary evidence submitted with SSN applications.	On-going. In late February 2002 and ending March 22, 2002, SSA piloted its photocopying of all documentary evidence in eight offices (two each in four regions). Each week, SSA's Data Operations Center scanned and indexed the evidence. SSA is performing Cost-Benefit Analyses for this pilot.
7. Change the Modernized Enumeration System (MES) to provide an electronic audit trail, regardless of the mode used to process SSN applications.	Completed. In December 2001, SSA implemented an audit trail in MES for all SSN applications being processed in MES' batch mode.
8. Implement the Social Security Number Verification System.	On-going. SSA began piloting the on-line version of its Social Security Number Verification System with a small number of employers on April 22, 2002.

Appendix E

Agency Comments



SOCIAL SECURITY

MEMORANDUM

Date: July 29, 2002 Refer To: S1J-3

To: James G. Huse, Jr.
Inspector General

From: Larry Dye /s/
Chief of Staff

Subject: Office of the Inspector General Draft Report, "The Social Security Administration Continues Assigning Original Social Security Numbers To Foreign-Born Individuals Who Present Invalid Evidentiary Documents" (A-08-02-12056)—INFORMATION

We appreciate OIG's efforts in conducting this review. Our comments on the report content and recommendations are attached.

Please let us know if we can be of further assistance. Staff questions can be referred to Dan Sweeney on extension 51957.

Attachment:
SSA Response

COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL (OIG) DRAFT REPORT,
“THE SOCIAL SECURITY ADMINISTRATION CONTINUES ASSIGNING ORIGINAL
SOCIAL SECURITY NUMBERS TO FOREIGN-BORN INDIVIDUALS WHO PRESENT
INVALID EVIDENTIARY DOCUMENTS” (A-08-02-12056)

We appreciate OIG’s efforts in conducting this review. However, the OIG findings and conclusions are based on a review of Social Security numbers (SSN) issued before SSA’s Enumeration Response Team undertook various enumeration initiatives related to the terrorist attacks of September 11, 2001 and detailed by OIG in Appendix D of the report. SSNs assigned in the period covered by the review were not subject to the same scrutiny as numbers assigned in the months following the attacks. We support OIG’s plans to assess the effectiveness of the changes made since September 11, 2001.

We also wish to note other efforts we have made to strengthen the enumeration process. The Agency plans to partner with the Immigration and Naturalization Service (INS) and OIG in opening Enumeration Centers in several large metropolitan areas to ensure that only qualified individuals with valid documents will receive SSNs and cards. The first Center would be located in Brooklyn, New York. The Centers will be staffed by SSA, and will also have some INS and OIG employees on site. Its purpose is to improve the document authentication process, deter and detect SSN fraud and assist in identifying and analyzing trends and suspicious activities.

Our responses to the specific recommendations are provided below. In addition, we provide technical comments that we believe will improve the presentation and content of the report.

Recommendation 1

Continue the plan to expeditiously implement the prior audit recommendation to obtain independent verification of all noncitizen evidentiary documents before issuing SSNs.

We agree. SSA has already committed to full collateral verification of INS documents. Implementation by our field offices began on July 15, 2002 and will be completed by September 1, 2002.

Recommendation 2

Expedite the prior audit recommendation to implement systems controls that would interrupt SSN assignment when SSA mails multiple cards to common addresses or when parents claim an improbably large number of children.

The Agency remains committed to the long-term fraud initiatives. However, after September 11th, more immediate enumeration actions were needed which required the same resources. The long-term fraud initiatives are a complex and difficult undertaking, involving the creation of databases to evaluate relationships that current systems are not able to assess.

Appendix F

OIG Contacts and Staff Acknowledgments

OIG Contacts

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Treasurer, National Council of Social Security Management Associations, Incorporated	1
Social Security Advisory Board	1
AFGE General Committee	9
President, Federal Managers Association	1
Regional Public Affairs Officer	1
Total	96

Overview of the Office of the Inspector General

Office of Audit

The Office of Audit (OA) conducts comprehensive financial and performance audits of the Social Security Administration's (SSA) programs and makes recommendations to ensure that program objectives are achieved effectively and efficiently. Financial audits, required by the Chief Financial Officers' Act of 1990, assess whether SSA's financial statements fairly present the Agency's financial position, results of operations and cash flow. Performance audits review the economy, efficiency and effectiveness of SSA's programs. OA also conducts short-term management and program evaluations focused on issues of concern to SSA, Congress and the general public. Evaluations often focus on identifying and recommending ways to prevent and minimize program fraud and inefficiency, rather than detecting problems after they occur.

Office of Executive Operations

The Office of Executive Operations (OEO) provides four functions for the Office of the Inspector General (OIG) – administrative support, strategic planning, quality assurance, and public affairs. OEO supports the OIG components by providing information resources management; systems security; and the coordination of budget, procurement, telecommunications, facilities and equipment, and human resources. In addition, this Office coordinates and is responsible for the OIG's strategic planning function and the development and implementation of performance measures required by the Government Performance and Results Act. The quality assurance division performs internal reviews to ensure that OIG offices nationwide hold themselves to the same rigorous standards that we expect from the Agency. This division also conducts employee investigations within OIG. The public affairs team communicates OIG's planned and current activities and the results to the Commissioner and Congress, as well as other entities.

Office of Investigations

The Office of Investigations (OI) conducts and coordinates investigative activity related to fraud, waste, abuse, and mismanagement of SSA programs and operations. This includes wrongdoing by applicants, beneficiaries, contractors, physicians, interpreters, representative payees, third parties, and by SSA employees in the performance of their duties. OI also conducts joint investigations with other Federal, State, and local law enforcement agencies.

Counsel to the Inspector General

The Counsel to the Inspector General provides legal advice and counsel to the Inspector General on various matters, including: 1) statutes, regulations, legislation, and policy directives governing the administration of SSA's programs; 2) investigative procedures and techniques; and 3) legal implications and conclusions to be drawn from audit and investigative material produced by the OIG. The Counsel's office also administers the civil monetary penalty program.