
**OFFICE OF
THE INSPECTOR GENERAL**

SOCIAL SECURITY ADMINISTRATION

**ASSIGNMENT OF SOCIAL SECURITY
NUMBERS TO INDIVIDUALS IN THE
COMMONWEALTH OF THE
NORTHERN MARIANA ISLANDS
AND AMERICAN SAMOA**

February 2009 A-08-08-18098

AUDIT REPORT



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SOCIAL SECURITY

MEMORANDUM

Date: February 25, 2009 **Refer To:**

To: The Commissioner

From: Inspector General

Subject: Assignment of Social Security Numbers to Individuals in the Commonwealth of the Northern Mariana Islands and American Samoa (A-08-08-18098)

OBJECTIVE

Our objective was to assess the Social Security Administration's (SSA) process for assigning Social Security numbers (SSN) to individuals in the Commonwealth of the Northern Mariana Islands (CNMI) and American Samoa.

BACKGROUND

The Northern Mariana Islands are a Commonwealth of the United States located in the North Pacific Ocean, and American Samoa is an unincorporated territory of the United States located in the South Pacific Ocean. Each of these insular areas¹ has its own government and immigration system. Individuals born in the CNMI are U.S. citizens and those in American Samoa are U.S. nationals (considered the same as U.S. citizens for SSA purposes).² However, thousands of noncitizens travel to these insular areas each year to work. Appendix B provides a description of the CNMI and American Samoa and a map showing their locations.

Individuals in these insular areas can apply for an SSN at SSA's field offices in Saipan, CNMI, and Pago Pago, American Samoa. When applying for an original SSN, applicants must provide acceptable documentary evidence of (1) age, (2) identity, and (3) U.S. citizenship or work-authorized lawful noncitizen status and/or a valid nonwork reason.³ In 2007, SSA field offices in the CNMI and American Samoa assigned over 5,200 original SSNs to U.S. citizens and noncitizens. Appendix B (Figures 1 and 2) shows the number of SSNs these field offices assigned by citizenship and country of birth and the age of noncitizens.

¹ Insular area is the generic term that refers to any commonwealth, freely associated state, possession, or territory of the United States.

² Program Operations Manual System (POMS), section GN 00303.120.A.6&7.

³ POMS, section RM 00203.001C.

To accomplish our objective, we identified a population of 5,229 individuals to whom SSA assigned original SSNs based on applications processed at the Saipan and Pago Pago field offices in 2007. From this population, we randomly selected a sample of 200 SSNs to determine whether SSA personnel followed applicable policies and procedures when processing SSN applications. To learn more about the challenges SSA faces in assigning SSNs to individuals in the CNMI and American Samoa, we interviewed representatives from SSA's Office of Income Security Programs and the managers of the Saipan and Pago Pago field offices. We also interviewed Department of the Interior, Office of Insular Affairs,⁴ and Department of Homeland Security (DHS) officials about immigration and security issues. Because of DHS' responsibilities for immigration enforcement and the Department of the Interior's responsibilities for administrative oversight of insular areas, we will provide copies of this report to the Inspectors General of those agencies. Appendix C includes a detailed description of our scope and methodology.

RESULTS OF REVIEW

We are concerned that SSA's policies and practices may place it at-risk for improper SSN assignment to individuals in the CNMI and American Samoa. Specifically, because SSA relies on the CNMI and American Samoa immigration systems (not DHS immigration verification and screening), we are concerned about the potential that SSA may assign SSNs to individuals who may not be who they purport to be. However, during our audit, the United States enacted legislation applying U.S. immigration law to the CNMI. While we are encouraged by this legislation, until DHS implements final regulations, key details regarding noncitizen workers remain unknown. We are unaware of any proposed legislation to apply U.S. immigration law to American Samoa. In addition, SSA processed noncitizen SSN applications at its Saipan and Pago Pago field offices without written operating policies and procedures. Finally, field office personnel in Pago Pago, American Samoa, did not always document their independent verification of birth records for individuals claiming U.S. citizenship.

⁴ The Department of the Interior, Office of Insular Affairs has administrative responsibility for CNMI (per Executive Order 12572-*Relations with the Northern Mariana Islands*, November 3, 1986) and American Samoa (per Executive Order 10264-*Transfer of the Administration of American Samoa from the Secretary of the Navy to the Secretary of the Interior*, June 29, 1951).

SSA RELIES ON CNMI AND AMERICAN SAMOA IMMIGRATION AGENCIES WHEN PROCESSING NONCITIZEN SSN APPLICATIONS

Because SSA relies on the CNMI and American Samoa immigration systems to help establish lawful noncitizen status—a key requirement for SSN assignment—we are concerned about the potential for improper SSN assignment. Unlike DHS, the CNMI and American Samoa do not conduct the same level of screening and background checks to identify individuals who have criminal records or may be a danger to U.S. security.

We are concerned about SSN assignment in the CNMI because the Department of the Interior and the Government Accountability Office have expressed concerns about the administration of its immigration system, including the lack of an effective pre-screening process for noncitizens who wish to enter the CNMI to work.⁵ For example, the Deputy Assistant Secretary of the Interior for Insular Affairs testified before Congress in 2007 that “. . . in a post 9/11 environment, and given the CNMI’s location and the number of aliens that travel there, we believe that continued local control of the CNMI’s immigration system presents significant national security and homeland security concerns.” As such, inadequate verification and screening could increase the potential for SSA to assign SSNs to noncitizens who are not authorized to work or who they purport to be.

In May 2008, the United States enacted legislation applying U.S. immigration law⁶ to the CNMI—1 year after enactment subject to a transition period that begins on June 1, 2009 and ends on December 31, 2014.⁷ The legislation’s stated intent is to ensure effective border control procedures and protect national and homeland security. While we are encouraged by this legislation, until DHS implements final regulations, key details regarding noncitizen workers remain unknown.

The Department of the Interior and DHS officials we interviewed were not aware of proposed legislation to apply U.S. immigration law to American Samoa. As such, SSA will continue to depend on American Samoa’s immigration system to help it establish lawful noncitizen status. The Department of the Interior and DHS officials told us they believe the potential security risks in American Samoa are not as great as in the CNMI, mainly because American Samoa is more geographically isolated, and most foreign workers come from nearby Samoa. While we believe SSA is potentially vulnerable to

⁵ In its August 2008 report, *Commonwealth of the Northern Mariana Islands: Managing Potential Economic Impact of Applying U.S. Immigration Law Requires Coordinated Federal Decisions and Additional Data* (GAO-08-791), the Government Accountability Office reported that, in 2005, foreign workers (noncitizens) represented the majority of all CNMI workers and outnumbered U.S. citizens in most industries.

⁶ As defined in section 101(a)(17) of the *Immigration and Nationality Act* (8 U.S.C. 1101(a)(17)).

⁷ *The Consolidated Natural Resources Act of 2008*, P.L. 110-229 (S.2739). According to the Act, the Secretary of Homeland Security has discretion to delay the start of the transition period for up to 180 days.

improper SSN assignment in American Samoa because of the absence of U.S. immigration law, we acknowledge the security risk may not be as great as in the CNMI.

SSA PROCESSED NONCITIZEN SSN APPLICATIONS WITHOUT WRITTEN OPERATING POLICIES AND PROCEDURES

Internal control standards require that controls be clearly documented and such documentation appear in management directives, administrative policies, or operating manuals.⁸ However, SSA processed noncitizen SSN applications at its Saipan and Pago Pago field offices without written operating policies and procedures.⁹ That is, neither POMS nor SSA regional instructions specifically addressed the unique immigration situation (non-DHS screening) in the CNMI and American Samoa. Although POMS provides a list of acceptable immigration documents that establish lawful noncitizen status for SSN applications,¹⁰ it does not specify the documents noncitizens in the CNMI and American Samoa should provide to SSA.

Furthermore, we are concerned that no provision existed for SSA to assign SSNs to noncitizens based on immigration and work documents issued by the CNMI and American Samoa. Because neither POMS nor regional instructions stipulate what field office personnel should consider as acceptable evidence of noncitizen status in the CNMI and American Samoa, we do not believe that recognition of such immigration and work permits satisfies SSA's requirements for assigning SSNs.

When processing noncitizen SSN applications, both offices relied on historical procedures. For example, Pago Pago field office personnel required that noncitizens provide, as proof of work-authorized lawful noncitizen status, an immigration identification and work-authorization letter issued by the American Samoa Immigration Office. Although field office personnel did not verify these documents with American Samoa immigration officials, they compared signatures on immigration documents provided by noncitizens with a signature list of authorized immigration officials to ensure they matched. While field office personnel in Saipan required that noncitizens provide a CNMI entry permit (issued jointly by the Departments of Labor and Immigration), like the Pago Pago field office, they did not verify immigration documents with the issuing agency. However, in contrast to American Samoa, Saipan field office personnel did not maintain an authorized signature list of immigration

⁸ U.S. General Accounting Office (now referred to as the Government Accountability Office) *Standards for Internal Control in the Federal Government*, GAO/AIMD-00-21.3.1, page 15 (Appropriate Documentation of Transactions and Internal Control), November 1999.

⁹ While we acknowledge that field office personnel process CNMI and American Samoa noncitizen SSN applications through SS-5 Assistant, a Microsoft Access-based application to assist SSA personnel in documenting evidence, the evidentiary documents listed in SS-5 Assistant for these noncitizens are not based on written operating policies and procedures.

¹⁰ POMS, section RM 00203.600.

officials. As such, fraudulent documents may have gone undetected. In fact, the Saipan field office manager acknowledged this potential vulnerability.

We believe it is important for the Saipan field office to have some means of verifying the authenticity of immigration documents, such as comparing signatures on immigration documents provided by noncitizens with a signature list of authorized immigration officials to ensure they match. Although we acknowledge this interim step is not a substitute for DHS screening, until U.S. immigration takes control, we believe it will help reduce the potential for improper SSN assignment.

SSA has established specific policies and procedures for assigning SSNs to noncitizens in similar unique situations. For example, citizens of Compact of Free Association countries (currently the Federated States of Micronesia, Republic of the Marshall Islands, and Republic of Palau) may enter, reside, and work in the United States without regard to certain provisions of the *Immigration and Nationality Act*.¹¹ Because of this unique situation, SSA established specific guidelines for field office personnel. We believe similar policies and procedures (tailored to the specific immigration circumstances in the CNMI and American Samoa) would help ensure proper SSN assignment. Headquarters personnel we contacted generally agreed that written operating procedures, such as those found in SSA's POMS, would be beneficial.

FIELD OFFICE PERSONNEL DID NOT ALWAYS DOCUMENT VERIFICATION OF BIRTH RECORDS

SSA policies and procedures require that field office personnel document evidence of (1) age, (2) identity, and (3) U.S. citizenship or work-authorized lawful noncitizen status and/or a valid nonwork reason when processing original SSN applications. Of the 200 SSN applications we reviewed, field office personnel generally complied with these requirements. However, we found that field office personnel in Pago Pago, American Samoa did not document independent verification of birth records for individuals claiming U.S. citizenship in 22 instances.¹² Although we verified the birth records for these individuals, SSA could be vulnerable to individuals providing false documents to obtain an SSN and possibly enter the continental United States. Established policies and procedures can only be effective if personnel processing SSN applications comply with them. As such, we believe SSA should reemphasize the importance of following all policies and procedures when processing SSN applications.

¹¹ POMS, section RM 00203.420.

¹² POMS, section RM 00203.110C.1.

CONCLUSION AND RECOMMENDATIONS

We are encouraged that DHS is scheduled to take control of the CNMI immigration as early as June 2009. However, in the interim, we believe SSA should take steps in its Saipan field office to help ensure the validity of immigration and work documents provided by noncitizens. Furthermore, we believe written operating polices and procedures in both insular areas would help ensure proper SSN assignment.

Accordingly, we recommend that SSA:

1. Establish written policies and procedures, including a list of acceptable immigration and work-authorization documents, for assigning SSNs to noncitizens in the CNMI and American Samoa. When DHS assumes responsibility for CNMI immigration, SSA should reassess and revise its policies and procedures, as needed.
2. Until DHS assumes responsibility for the CNMI immigration, instruct the Saipan field office personnel to compare signatures on immigration documents provided by noncitizens with a signature list of authorized immigration officials to ensure they match.
3. Reemphasize to Pago Pago field office personnel the importance of following all enumeration policies and procedures.

AGENCY COMMENTS

SSA agreed with our recommendations. The Agency also provided a technical comment that we incorporated. The Agency's comments are included in Appendix D.



Patrick P. O'Carroll, Jr.

Appendices

[APPENDIX A](#) – Acronyms

[APPENDIX B](#) – Background

[APPENDIX C](#) – Scope and Methodology

[APPENDIX D](#) – Agency Comments

[APPENDIX E](#) – OIG Contacts and Staff Acknowledgments

Appendix A

Acronyms

CNMI	Commonwealth of the Northern Mariana Islands
DHS	Department of Homeland Security
OIG	Office of the Inspector General
POMS	Program Operations Manual System
SSA	Social Security Administration
SSN	Social Security Number

Background

The **Commonwealth of the Northern Mariana Islands (CNMI)** is a group of 14 islands located just north of Guam. The principal inhabited islands are Saipan, Rota, and Tinian. In 1976, after almost 30 years as a trust territory, the District of the Mariana Islands entered into a Covenant with the United States establishing the island territory's status as a self-governing Commonwealth in political union with the United States.¹ The Covenant grants the CNMI the right of self-governance over internal affairs and the United States the responsibility and authority for matters relating to foreign affairs and defense affecting the CNMI.

American Samoa consists of five islands located about 2,300 miles southwest of Hawaii. The largest and most populated island is Tutuila, on which is located the territory's capital, Pago Pago. It is an unincorporated territory because not all provisions of the U.S. Constitution apply. The U.S. Congress has given plenary authority over the territory to the Secretary of the Interior, who in turn allowed American Samoans to draft their own constitution under which their government functions.

Location of the CNMI and American Samoa

Source: Pacific Applications Climate Center website.

¹ Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America (Pub. L. No. 94-241, § 1, 90 Stat. 263 (Mar. 24, 1976), 48 U.S.C. § 1801 note).

As shown in Figure 1, most noncitizens entering the Commonwealth of the Northern Mariana Islands and assigned Social Security numbers (SSN) through the Saipan field office were from China and the Philippines. About 95 percent of the noncitizens were between the ages of 16 and 50, as shown in Figure 1a. Based on an analysis of Detailed Earnings Queries for the noncitizen SSNs in our sample, we found that about 6 (62 percent) of every 10 noncitizens assigned an SSN in the CNMI in 2007 had no wages posted to their Social Security Administration (SSA) earnings record. Without extensive investigation of each case, we could not determine the reason for this situation.

Figure 1: SSNs Assigned in 2007 by Citizenship and Country of Birth for the Saipan, CNMI, Field Office

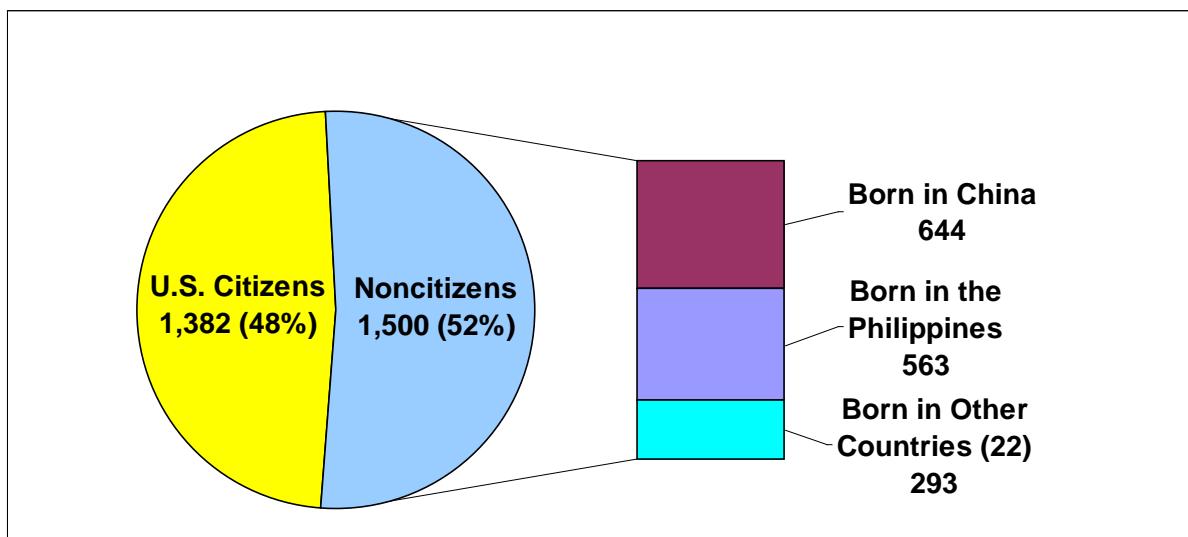


Figure 1a: SSNs Assigned in 2007 by Age of Noncitizens for the Saipan, CNMI, Field Office

Age Range	Number of Noncitizens	% of Total
0 to 15 ²	39	2
16 to 30	938	63
31 to 50	484	32
51 and above	39	3
Total	1,500	100

Source for Figures 1 and 1a: Office of the Inspector General analysis of original SSNs assigned in Calendar Year 2007.

² SSA generally assigned SSNs to noncitizens under age 16 because they were citizens of Compact of Free Association countries, were applying for Social Security benefits, or provided a CNMI work-authorization document.

As shown in Figure 2, most noncitizens entering American Samoa and assigned SSNs through the Pago Pago field office were from Samoa. About 96 percent of the noncitizens were between the ages of 16 and 50, as shown in Figure 2a. Based on an analysis of Detailed Earnings Queries for the noncitizen SSNs in our sample, we found that almost 2 (18 percent) of every 10 noncitizens assigned an SSN in American Samoa in 2007 had no wages posted to their SSA earnings record. Without extensive investigation of each case, we could not readily determine the reason for this situation.

Figure 2: SSNs Assigned in 2007 by Citizenship and Country of Birth
for the Pago Pago, American Samoa, Field Office

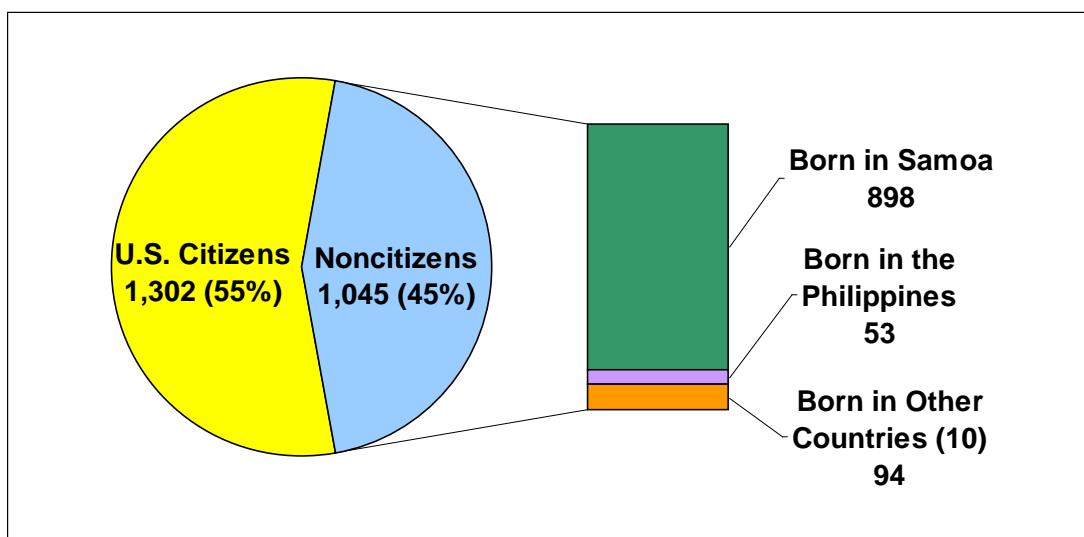


Figure 2a: SSNs Assigned in 2007 by Age of Noncitizens for the
Pago Pago, American Samoa, Field Office

Age Range	Number of Noncitizens	% of Total
0 to 15 ³	20	2
16 to 30	699	67
31 to 50	307	29
51 and above	19	2
Total	1,045	100

Source for Figures 2 and 2a: Office of the Inspector General analysis of original SSNs assigned in Calendar Year 2007.

³ SSA generally assigned SSNs to noncitizens under age 16 because they were applying for Social Security or other public assistance benefits.

Scope and Methodology

To achieve our objective, we:

- Reviewed pertinent sections of the Social Security Administration's (SSA) policies and procedures as well as other relevant Federal laws and regulations.
- Reviewed the current legislation applying Federal immigration law to the Commonwealth of the Northern Mariana Islands (CNMI).
- Reviewed reports and testimony by the Government Accountability Office related to American Samoa and security vulnerabilities in the CNMI and the potential impact of applying U.S. immigration law.
- Obtained a data extract from SSA's Modernized Enumeration System Transaction History File of 5,229 original Social Security numbers (SSN) that SSA assigned to individuals in the CNMI and American Samoa from January 1 through December 31, 2007.
- From the population of 5,229 SSNs, we randomly selected and reviewed a sample of 200 SSNs. For each sampled SSN, we determined whether SSA personnel followed applicable policies and procedures when processing the SSN application. We independently verified immigration documents and U.S. birth records with the immigration and vital statistics agencies in both insular areas.
- Interviewed representatives from SSA's Office of Income Security Programs.
- We talked, by telephone, with the managers of the SSA field offices in Saipan, CNMI, and Pago Pago, American Samoa, about their procedures for processing SSN applications.
- Contacted a representative from the Department of the Interior, Office of Insular Affairs to obtain information about immigration issues in the CNMI and American Samoa.
- Contacted a Department of Homeland Security representative to obtain information about the transition to U.S. immigration in the CNMI.

The SSA entity reviewed was the Office of the Deputy Commissioner for Operations. We performed our audit at the Office of Audit in Birmingham, Alabama. Our review of internal controls was limited to SSA's policies and procedures for processing applications for original SSNs at its Saipan and Pago Pago field offices. We relied primarily on Modernized Enumeration System data to complete our review and determined the data used in the report were sufficiently reliable given the audit objective and use of the data. We conducted our work from April through October 2008 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 that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Appendix D

Agency Comments



SOCIAL SECURITY

MEMORANDUM

Date: February 9, 2009 **Refer To:** S1J-3

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

From: James A. Winn /s/
Chief of Staff

Subject: Office of the Inspector General (OIG) Draft Report, "Assignment of Social Security Numbers to Individuals in the Commonwealth of the Northern Mariana Islands and American Samoa"
(A-08-08-18098)--INFORMATION

Thank you for the opportunity to review and comment on the draft report. We appreciate OIG's efforts in conducting this review. Our response to the report findings and recommendations are attached.

Please let me know if we can be of further assistance. Please direct staff inquiries to Ms. Candace Skurnik, Director, Audit Management and Liaison Staff, at extension 54636.

Attachment:
SSA Response

COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL (OIG) DRAFT REPORT, "ASSIGNMENT OF SOCIAL SECURITY NUMBERS (SSN) TO INDIVIDUALS IN THE COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS (CNMI) AND AMERICAN SAMOA" (A-08-08-18098)

We have reviewed the subject report and agree with the findings and recommendations. We appreciate your acknowledgement of the work we have done to strengthen the evidence requirements through the changes to the SS5 Assistant. Our responses to the specific recommendations are provided below. We are also providing a technical comment to increase the accuracy of the report.

Recommendation 1

Establish written policies and procedures, including a list of acceptable immigration and work-authorization documents, for assigning SSNs to noncitizens in the CNMI and American Samoa. When the Department of Homeland Security (DHS) assumes responsibility for CNMI immigration, SSA should reassess and revise its policies and procedures, as needed.

Response

We agree. We are in the process of writing an Emergency Message (EM) to document which American Samoa immigration and work authorization documents meet our evidence requirements to establish evidence of work authorization. In calendar year (CY) 2009 we will also update the Program and Operations Manual System instructions eliminating any further need for the EM. We anticipate releasing written policies and procedures by the end of CY 2009.

Recommendation 2

Until DHS assumes responsibility for the CNMI immigration, instruct the Saipan field office personnel to compare signatures on immigration documents provided by noncitizens with a signature list of authorized immigration officials to ensure they match.

Response

We agree. We will include this instruction when we issue written policies and procedures as noted in our response to Recommendation 1.

Recommendation 3

Reemphasize to Pago Pago field office personnel the importance of following all enumeration policies and procedures.

Response

We agree and have shared the audit findings with the San Francisco Regional Office so that Pago Pago field office personnel are reminded to follow enumeration policies and procedures.

Appendix E

OIG Contacts and Staff Acknowledgments

OIG Contacts

Kimberly A. Byrd, Director, 205-801-1650

Jeff Pounds, Audit Manager, 205-801-1606

Acknowledgments

In addition to those named above:

Charles Lober, Senior Auditor

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