

Audit Report

Social Security Numbers Assigned
and Benefits Paid to Refugees,
Parolees, and Asylees

A-08-16-50142 / July 2017

OIG

Office of the Inspector General
SOCIAL SECURITY ADMINISTRATION

MEMORANDUM

Date: July 19, 2017

Refer To:

To: The Commissioner

From: Acting Inspector General

Subject: Social Security Numbers Assigned and Benefits Paid to Refugees, Parolees, and Asylees
(A-08-16-50142)

The attached final report presents the results of the Office of Audit's review. The objectives were to determine whether the Social Security Administration properly (1) assigned Social Security numbers and (2) verified eligibility for Old-Age, Survivors and Disability Insurance and Supplemental Security Income benefit payments made to refugees, parolees, and asylees.

Please provide within 60 days a corrective action plan that addresses each recommendation. 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

Social Security Numbers Assigned and Benefits Paid to Refugees, Parolees, and Asylees

A-08-16-50142



July 2017

Office of Audit Report Summary

Objectives

To determine whether the Social Security Administration (SSA) properly (1) assigned Social Security numbers (SSN) and (2) verified eligibility for Old-Age, Survivors and Disability Insurance (OASDI) and Supplemental Security Income (SSI) benefit payments made to refugees, parolees, and asylees.

Background

Thousands of refugees, parolees, and asylees enter the United States each year. The Department of Homeland Security may grant these noncitizens legal status when they claim persecution or fear of persecution because of race, religion, nationality, membership in a particular social group, or political opinion.

Many refugees, parolees, and asylees qualify for an SSN based on work authorization or another need, such as entitlement to federally funded, State, or local public assistance benefits.

In some cases, these noncitizens may also qualify for OASDI and/or SSI benefits. Spouses and children of these noncitizens may be eligible for benefits based on earnings or their relationship to an OASDI/SSI beneficiary. Eligible refugees, parolees, and asylees must meet income requirements coupled with disability and/or age determinations to receive SSI payments.

Findings

Based on our sample review, we concluded that SSA properly assigned SSNs to refugees, parolees, and asylees from January 1, 2011 through December 31, 2015. Additionally, we concluded that SSA sufficiently verified eligibility for OASDI and SSI benefits paid to refugees, parolees, and asylees during our audit period.

We noted one documentation issue, which we brought to SSA's attention. Specifically, when processing OASDI and SSI claims, the Agency did not maintain supporting evidence establishing lawful presence in the United States for six beneficiaries, as SSA policy requires. However, we subsequently obtained evidence of lawful United States presence for these beneficiaries.

Recommendation

We recommend that SSA issue a reminder to employees to maintain all supporting evidence of lawful presence in the United States upon verification of a noncitizen's immigration status for initial claims and post-entitlement actions.

SSA agreed with our recommendation.

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ABBREVIATIONS

Act	<i>Consolidated Appropriations Act, 2008</i>
DHS	Department of Homeland Security
OASDI	Old-Age, Survivors and Disability Insurance
OIG	Office of the Inspector General
POMS	Program Operations Manual System
Pub. L. No.	Public Law Number
SAVE	Systematic Alien Verification for Entitlements
SSA	Social Security Administration
SSI	Supplemental Security Income
SSN	Social Security Number
Stat.	Statutes at Large
U.S.	United States
U.S.C.	United States Code

OBJECTIVES

Our objectives were to determine whether the Social Security Administration (SSA) properly (1) assigned Social Security numbers (SSN) and (2) verified eligibility for Old-Age, Survivors and Disability Insurance (OASDI) and Supplemental Security Income (SSI) benefit payments made to refugees, parolees, and asylees.

BACKGROUND

Thousands of individuals enter the United States each year as refugees, parolees, and asylees. The Department of Homeland Security (DHS) may grant these noncitizens legal status when they claim persecution or fear of persecution because of race, religion, nationality, membership in a particular social group, or political opinion. (See Appendix A for DHS definitions of refugee, parolee, and asylee.)

Refugees, parolees, or asylees legally admitted to the United States may be eligible for an SSN based on their DHS admission status or they may have a work authorization document from DHS. Some parolees are not work-authorized but may qualify for a nonwork SSN based on entitlement to federally funded, State, or local public assistance benefits. (See Appendix B for evidence verification procedures for these noncitizens.)

In some situations, refugees, parolees, and asylees may also be eligible for OASDI benefits or SSI payments, which are administered by SSA. Individuals may qualify for OASDI based on work credits or their relationship to an OASDI beneficiary. With work credits, refugees, parolees, and asylees may be eligible for OASDI retirement or disability benefits, as appropriate. An individual may also qualify for OASDI as the dependent of an existing beneficiary (for example, a spouse or child). A number of Federal laws have established additional eligibility requirements that these noncitizens must meet before SSA processes their OASDI benefit claims (see Appendix C for details of Federal laws).

In addition, refugees, parolees, and asylees applying for benefits must be lawfully present in the United States, and SSA policy requires that it maintain all supporting evidence pertinent to an individual's claim, including evidence submitted to establish lawful presence.¹ Refugees, parolees, and asylees are qualified for SSI based on their DHS immigration status. To receive payments, an eligible refugee, parolee, or asylee must also meet all other SSI factors of eligibility. For example, the noncitizen must be aged, blind, or disabled and have income and resources that are within the allowable limits (see Appendix D).²

¹ SSA, *POMS, GN-General*, ch. GN 00301, subch. GN 00301.286 (February 2, 2015); SSA, *POMS, GN-General*, ch. GN 00303, subch. GN 00303.440 (February 22, 2012); and SSA, *POMS, GN-General*, ch. GN 00301, subch. GN 00301.285 (July 22, 2010).

² SSA, *POMS, SI-Supplemental Security Income*, ch. SI 00502, subch. SI 00502.100 (December 11, 2009).

From January 1, 2011 through December 31, 2015, SSA assigned original SSNs to 324,093 refugees, 167,702 parolees, and 116,595 asylees. For each of these immigration categories, we identified OASDI and SSI recipients. We then selected a random sample of 50 OASDI and 50 SSI recipients for each category. For the 300 sample records, we determined whether SSA followed its policies and procedures when assigning SSNs. We also determined whether SSA verified eligibility for OASDI and SSI benefit payments awarded to refugees, parolees, and asylees. In addition to reviewing Master Beneficiary and Supplemental Security Records, we reviewed benefit applications, lifetime earnings, and Systematic Alien Verification for Entitlements (SAVE) Program³ reports. Finally, we used available Alien Registration,⁴ I-94,⁵ and passport numbers to obtain SSA's SAVE verifications and confirm the immigration status for the noncitizens in our sample. See Appendix E for general demographics of our audit population and Appendix F for our detailed scope and methodology.

RESULTS OF REVIEW

Based on our sample review, we concluded that SSA properly assigned SSNs to refugees, parolees, and asylees from January 1, 2011 through December 31, 2015. Additionally, we concluded that SSA sufficiently verified eligibility for OASDI and SSI benefits paid to refugees, parolees, and asylees during our audit period.

We noted one documentation issue, which we brought to SSA's attention. Specifically, when processing OASDI and SSI claims, the Agency did not maintain supporting evidence establishing lawful presence in the United States for six beneficiaries, as SSA policy requires. However, we subsequently obtained evidence of lawful U.S. presence for these beneficiaries.

SSN Assignment

Based on our sample review, we concluded that SSA properly assigned SSNs to refugees, parolees, and asylees during Calendar Years 2011 through 2015. Table 1 illustrates the number of SSNs assigned to these noncitizens for each year of our audit period.

³ SAVE is a fee-based intergovernmental initiative designed to help Federal, State, tribal, and local government agencies and licensing bureaus confirm immigration status information.

⁴ The alien registration number is a unique identifier DHS issues to noncitizens.

⁵ DHS assigns an I-94, *Arrival/Departure Record*, number, which a noncitizen keeps while in the United States as documentation of his/her immigration status.

Table 1: Total SSN Assignment from 2011 Through 2015 for Audit Population

Total SSN Assignment for Audit Population						
Noncitizen Category	2011	2012	2013	2014	2015	Total
Refugee	52,925	64,402	65,680	73,209	67,877	324,093
Parolee	22,150	25,646	29,613	33,940	56,353	167,702
Asylee	23,588	28,333	24,713	21,650	18,311	116,595
Total	98,663	118,381	120,006	128,799	142,541	608,390

Source: OIG analysis of SSA data on SSNs assigned.

Eligibility for OASDI and SSI Benefit Payments

SSA had sufficiently verified eligibility for refugees, parolees, and asylees to whom it paid OASDI and SSI benefit payments during our audit period. Through our review of benefit applications, Master Beneficiary and Supplemental Security Records, and lifetime earnings, we determined SSA complied with its policies and procedures in paying these noncitizens OASDI and/or SSI benefits between January 1, 2011 through December 31, 2015. Table 2 shows the number and percent of benefit payments SSA awarded to each noncitizen category.

Table 2: OASDI/SSI Benefit Payments Awarded to Audit Population

Noncitizen Category	Total Population	Number Awarded OASDI	Number Awarded SSI	Total Awarded Benefits	Percent of Population Awarded Benefits
Refugee	324,093	70	23,312	23,382	7
Parolee	167,702	90	5,173	5,263	3
Asylee	116,595	50	1,450	1,500	1
Total	608,390	210	29,935	30,145	5

Source: OIG analysis of SSA data on SSNs assigned and benefits paid.

Evidence of Lawful Presence

SSA did not always maintain electronic evidence of refugees, parolees, and asylees' lawful presence in the United States to ensure it paid benefits in accordance with the lawful presence payment provisions, as policy requires.⁶ For example, OASDI records showed that SSA did not maintain all supporting evidence establishing lawful U.S. presence for 6 (15 percent) of the 40 beneficiaries who had benefit applications beginning January 1, 2015.⁷ However, we subsequently obtained evidence of lawful U.S. presence for these six beneficiaries.

We originally reported this issue in May 2014,⁸ stating that SSA needed to improve its controls to ensure it paid OASDI beneficiaries in accordance with the lawful presence payment provisions. In the prior review, SSA did not maintain all supporting evidence establishing lawful presence for 32 percent of the sample records reviewed. SSA updated policy⁹ and issued Administrative Message 14092, effective December 9, 2014, to remind SSA interviewers to document and store claims evidence, including evidence of U.S. citizenship, immigration status, and lawful presence.

CONCLUSIONS

Refugees, parolees, or asylees may be eligible for an SSN based on their DHS admission status or have a work authorization document from DHS. These noncitizens may also be eligible for OASDI benefits or SSI payments. SSA properly assigned SSNs and awarded benefits to qualified refugees, parolees, and asylees. However, SSA did not always maintain all supporting evidence establishing lawful presence, as policy requires.

RECOMMENDATION

We recommend that SSA issue a reminder to employees to maintain all supporting evidence of lawful presence in the United States upon verification of a noncitizen's immigration status for initial claims and post-entitlement actions.

⁶ SSA, *POMS, GN-General*, ch. GN 00301, subch. GN 00301.286, (February 2, 2015); SSA, *POMS, GN-General*, ch. GN 00303, subch. GN 00303.440 (February 22, 2012); and SSA, *POMS, GN-General*, ch. GN 00301, subch. GN 00301.285 (July 22, 2010).

⁷ SSA implemented the recommendations from the OIG Audit, *Title II Beneficiaries Receiving Benefits Under the Lawful Presence Payment Provisions*, A-09-12-21288, as of December 29, 2014. As such, we limited our lawful presence documentation review to Calendar Year 2015 benefit applications.

⁸ SSA, OIG, *Title II Beneficiaries Receiving Benefits Under the Lawful Presence Payment Provisions*, A-09-12-21288 (May 2014).

⁹ SSA, *POMS, GN-General*, ch. GN 00301, subch. GN 00301.286, sec. E.3.a (February 2, 2015).

AGENCY COMMENTS

SSA agreed with our recommendation. The full text of SSA's comments is included in Appendix G.

A handwritten signature in black ink, appearing to read "Rona Lawson".

Rona Lawson
Assistant Inspector General for Audit

APPENDICES

Appendix A – DEFINITIONS OF IMMIGRATION STATUS

Thousands of individuals enter the United States each year under the immigration categories of refugee, parolee, and asylee. The Department of Homeland Security (DHS) may grant these noncitizens legal status when they claim persecution or fear of persecution because of race, religion, nationality, membership in a particular social group, or political opinion.

Refugees

A refugee is someone who

- is located outside the United States and
- demonstrates that he/she was persecuted or feared persecution because of race, religion, nationality, political opinion, or membership in a particular social group.

Parolees

DHS defines a parolee as a noncitizen allowed into the United States for urgent humanitarian reasons or when that noncitizen's entry is determined to be for significant public benefit. Parole does not constitute a formal admission to the United States and confers temporary status only, requiring that parolees leave when the conditions supporting their parole cease to exist. Types of parolees include the following.

- **Deferred inspection:** authorized at the port upon the noncitizen's arrival. This category may be conferred by an immigration inspector when noncitizens appear at a port of entry with documentation, but, after preliminary examination, some question remains about their admissibility that can best be answered at their point of destination.
- **Advance parole:** authorized at a DHS district office before the noncitizen's arrival. This category may be issued to noncitizens residing in the United States in other than lawful permanent resident status who have an unexpected need to travel and return and whose conditions of stay do not otherwise allow for readmission to the United States if they depart.
- **Port-of-entry parole:** authorized at the port upon the noncitizen's arrival. This category applies to a variety of situations and is used at the supervisory immigration inspector's discretion—usually to allow short periods of entry. Examples include allowing noncitizens who could not be issued the necessary documentation within the required time period or who were otherwise inadmissible to attend a funeral and permitting the entry of emergency workers, such as firefighters, to assist with an emergency.
- **Humanitarian parole:** authorized at DHS headquarters for “urgent humanitarian reasons” specified in the law. This category is used in cases of medical emergency and comparable situations.

- **Public interest parole:** authorized at DHS headquarters for “significant public benefit” specified in the law. This category is generally used for noncitizens who enter to take part in legal proceedings.
- **Overseas parole:** authorized at a DHS district or sub-office while the noncitizen is still overseas; designed to constitute long-term admission to the United States. Recently, most of the noncitizens the DHS has processed through overseas parole have arrived under special legislation or international migration agreements.

Asylees

An asylee is a noncitizen in the United States or at a port of entry who is found to be unable or unwilling to return to his/her country of nationality or to seek the protection of that country because of persecution or a well-founded fear of persecution. Persecution or the fear thereof must be based on the individual’s race, religion, nationality, membership in a particular social group, or political opinion. For persons who have no nationality, the country in which the individual last habitually resided is considered his/her country of nationality. Asylees are eligible to adjust to lawful permanent resident status after 1 year of continuous presence in the United States. These immigrants are limited to 10,000 adjustments per fiscal year.

Appendix B – EVIDENCE VERIFICATION FOR NONCITIZENS

When a noncitizen applies for an original Social Security number (SSN), he/she must complete, sign and submit Form SS-5, *Application for a Social Security Card*, to the Social Security Administration (SSA)¹ and provide acceptable documentary evidence of (1) age, (2) identity, and (3) work authorized lawful alien status and/or a valid nonwork reason.² Refugees, parolees, and asylees may submit only one document as evidence of age, identity, and lawful alien status.³

SSA personnel verify documents through (1) visual inspection, including the use of a black light where appropriate⁴ and (2) verification with the Department of Homeland Security (DHS), either online or manually. SSA uses the Systematic Alien Verification for Entitlements (SAVE) program to verify all DHS evidence submitted to support an SSN application. The SAVE program is an information-sharing initiative designed to assist benefit-granting agencies in verifying an immigration document and determining an applicant's lawful immigration status. SAVE includes (1) the initial immediate electronic verification; (2) an additional verification where DHS checks additional databases and responds electronically; and (3) the document verification using the DHS Form G-845, *Verification Request*. The Form G-845 is a more extensive verification request that includes submission of a copy of the immigration document and a manual search by DHS of all its applicable automated and paper files.

¹ SSA, *POMS, RM-Records Maintenance*, ch. RM 10205, subch. RM 10205.001, sec. A (November 27, 2015).

² SSA, *POMS, RM-Records Maintenance*, ch. RM 10210, subch. RM 10210.020, sec. B (September 30, 2013); SSA, *POMS, RM-Records Maintenance*, ch. RM 10211, subch. RM 10211.001, sec. A (April 2, 2013); and SSA, *POMS, RM-Records Maintenance*, ch. RM 10211, subch. RM 10211.610 (July 31, 2014).

³ SSA, *POMS, RM-Records Maintenance*, ch. RM 10210, subch. RM 10210.020, sec. B (September 30, 2013).

⁴ SSA, *POMS, RM-Records Management*, ch. RM 10210, subch. RM 10210.210 (August 26, 2016).

Appendix C – FEDERAL LAWS REGARDING OLD-AGE, SURVIVORS AND DISABILITY INSURANCE

A number of Federal laws have established additional eligibility requirements that noncitizens must meet before the Social Security Administration (SSA) processes their Old-Age, Survivors and Disability Insurance (OASDI) benefit claims. Section 211 of the *Social Security Protection Act of 2004*¹ restricts SSA from authorizing Social Security benefits to noncitizens who received an original Social Security number (SSN) on or after January 1, 2004 unless they were assigned an SSN for work purposes.

Also, the lawful presence payment provisions of the *Social Security Act*² restrict paying OASDI benefits to noncitizens in the United States. Any noncitizen applying for benefits after December 1, 1996 must be lawfully present in the United States to receive benefits.³ Noncitizen beneficiaries must submit appropriate original documents issued by the Department of Homeland Security, such as the *Permanent Resident Card* (I-551) or *Arrival/Departure Record* (I-94), documenting their lawful presence in the United States when they apply for benefits.⁴ Finally, SSA policy requires that it maintain all supporting material pertinent to an individual's claim, including evidence submitted to establish lawful presence in the United States.⁵

The Ensign Amendment, incorporated into the *Consolidated Appropriations Act, 2008 (Act)*,⁶ prohibits funds appropriated in the *Act* from being

. . . expended or obligated by the Commissioner of Social Security for purposes of administering Social Security benefit payments under title II of the Social Security Act, to process claims for credit for quarters of coverage based on work performed under a social security account number that was not the claimant's number which is an offense prohibited under section 208 of the Social Security Act.

¹ *Social Security Protection Act of 2004*, Pub. L. No. 108-203, § 211, 118 Stat. 518.

² *Personal Responsibility and Work Opportunity Reconciliation Act of 1996*, Pub. L. No. 104-193, § 401, 110 Stat. 2105, p. 2261, 8 U.S.C. § 1611.b.2 (2014). *Illegal Immigration Reform and Immigrant Responsibility Act of 1996*, Pub. L. No. 104-208, § 503(a), 110 Stat. 3009, pp. 3009-546, 42 U.S.C. § 402(y) (2015).

³ SSA, *POMS, RS - Retirement and Survivors Insurance*, ch. RS 00204, subch. RS 00204.010, sec. A (January 4, 2017).

⁴ SSA, *POMS, RS - Retirement and Survivors Insurance*, ch. RS 00204, subch. RS 00204.025, sec. B (October 8, 2014).

⁵ SSA, *POMS, GN - General*, ch. GN 00301, subch. GN 00301.286 (February 2, 2015); SSA, *POMS, GN-General*, ch. GN 00303, subch. GN 00303.440 (February 22, 2012); and SSA, *POMS, GN-General*, ch. GN 00301, subch. GN 00301.285 (July 22, 2010).

⁶ *Consolidated Appropriations Act, 2008*, Pub. L. No. 110-161, § 527, 121 Stat. 2212.

The Ensign Amendment provisions superseded the *Social Security Protection Act of 2004* provisions when SSA determined the claimant had an “intent to deceive”—that is, the claimant willingly and knowingly falsely used another’s SSN for work purposes. In 2009, Congress extended the Ensign Amendment’s⁷ provisions through passage of the *Omnibus Appropriations Act, 2009*.⁸ However, the 2009 provision removed the “intent to deceive” condition and requires that the noncitizen be convicted under the *Social Security Act*⁹ for certain SSN-related offenses.

⁷ SSA continues to refer to the 2009 legislation as the “Ensign Amendment.”

⁸ *Omnibus Appropriations Act, 2009*, Pub. L. No. 111-8, § 522, 123 Stat. 806.

⁹ *Social Security Act*, 42 U.S.C. § 408(a)(6) and (a)(7) (2015).

Appendix D– QUALIFIED NONCITIZEN

A qualified noncitizen refers to an individual whose immigration status potentially permits receipt of Supplemental Security Income (SSI). Refugees, parolees, and asylees are qualified noncitizens based on their Department of Homeland Security (DHS) immigration status. To receive benefits, an eligible refugee, parolee, or asylee must also meet all other SSI factors of eligibility. For example, the noncitizen must be aged, blind, or disabled and have income and resources that are within the allowable limits.¹ SSA personnel review the original documentary evidence in conjunction with DHS verification provided via the online Systematic Alien Verification for Entitlements² to establish qualified status.³

¹ SSA, *POMS, SI-Supplemental Security Income*, ch. SI 00502, subch. SI 00502.100 (December 11, 2009).

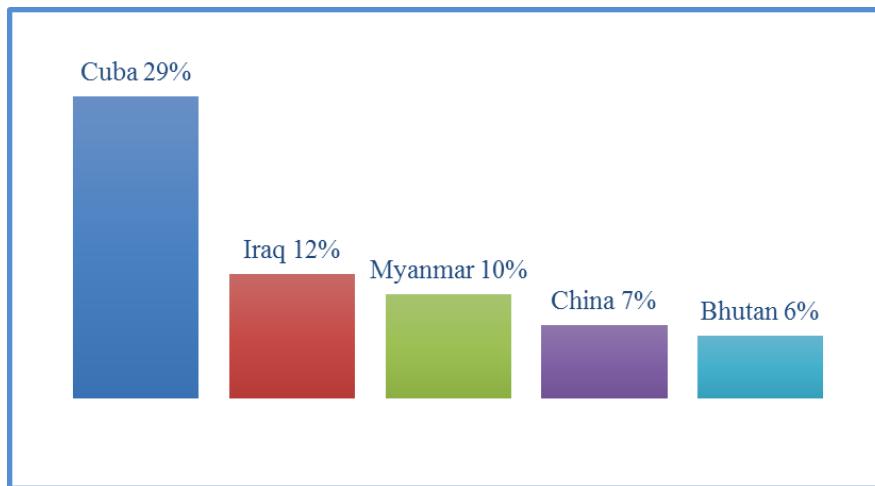
² SAVE is a fee-based intergovernmental initiative designed to help Federal, State, tribal, and local government agencies and licensing bureaus confirm immigration status information.

³ SSA, *POMS, SI-Supplemental Security Income*, ch. SI 00502, subch. SI 00502.130 (March 28, 2016).

Appendix E – AUDIT POPULATION

From January 1, 2011 through December 31, 2015, the Social Security Administration (SSA) assigned 608,390 Social Security numbers (SSN) to refugees, parolees, and asylees. These noncitizens' average age was 28, including almost 80 percent who were age 40 or younger. As shown in Figure E–1, the top countries of birth for these noncitizens were Cuba, Iraq, Myanmar, China, and Bhutan.

Figure E–1: Top Countries of Birth for SSNs Assigned

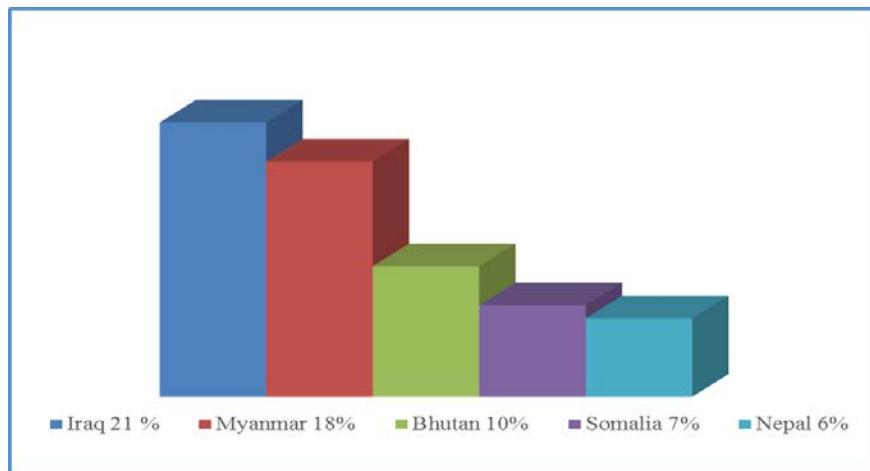


Source: OIG analysis of SSA data on SSNs assigned.

Refugees

From January 1, 2011 through December 31, 2015, refugees from 205 different countries of birth arrived in the United States and received SSNs. As shown in Figure E–2, the top five countries of birth were Iraq, Myanmar, Bhutan, Somalia, and Nepal. Refugees from these countries represented 6 in every 10 refugees who entered the United States and received an SSN from January 1, 2011 through December 31, 2015.

Figure E–2: Top Five Countries of Birth for Refugees

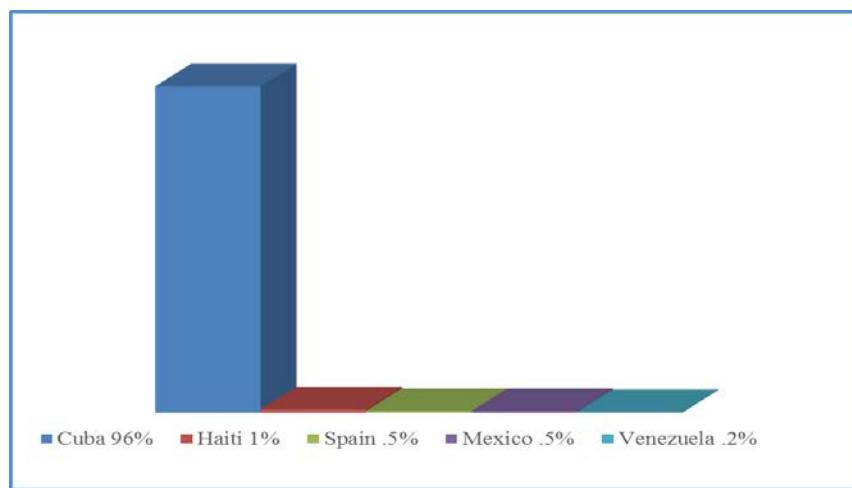


Source: OIG analysis of SSA data on SSNs assigned to refugees.

Parolees

During our audit period, parolees from 189 different countries of birth arrived in the United States and received SSNs. As shown in Figure E–3, the top five countries of birth were Cuba, Haiti, Spain, Mexico, and Venezuela. Parolees from these countries represented 9 in every 10 parolees who entered the United States and received an SSN from January 1, 2011 through December 31, 2015.

Figure E–3: Top Five Countries of Birth for Parolees



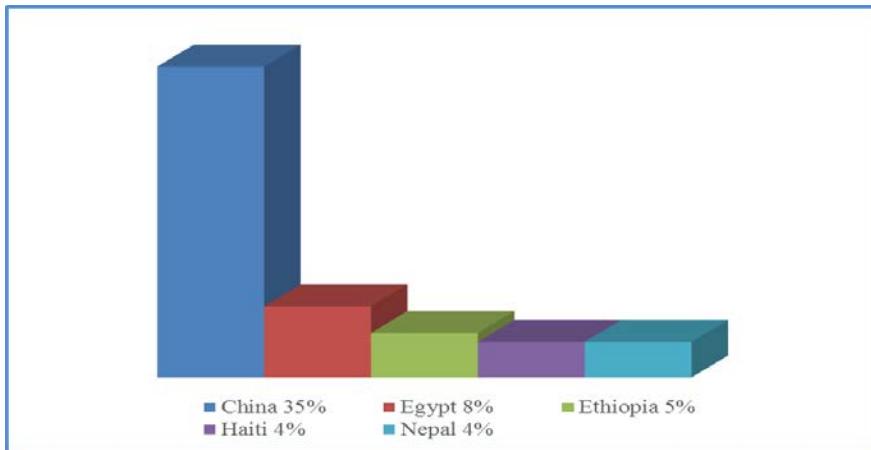
Source: OIG analysis of SSA data on SSNs assigned to parolees.

Asylees

During our audit period, asylees from 227 different countries of birth arrived in the United States and received SSNs. As shown in Figure E–4, the top five countries of birth were China, Egypt, Ethiopia, Haiti, and Nepal. Asylees from these countries represented 6 in every 10 asylees who

entered the United States and received an SSN from January 1, 2011 through December 31, 2015.

Figure E–4: Top Five Countries of Birth for Asylees

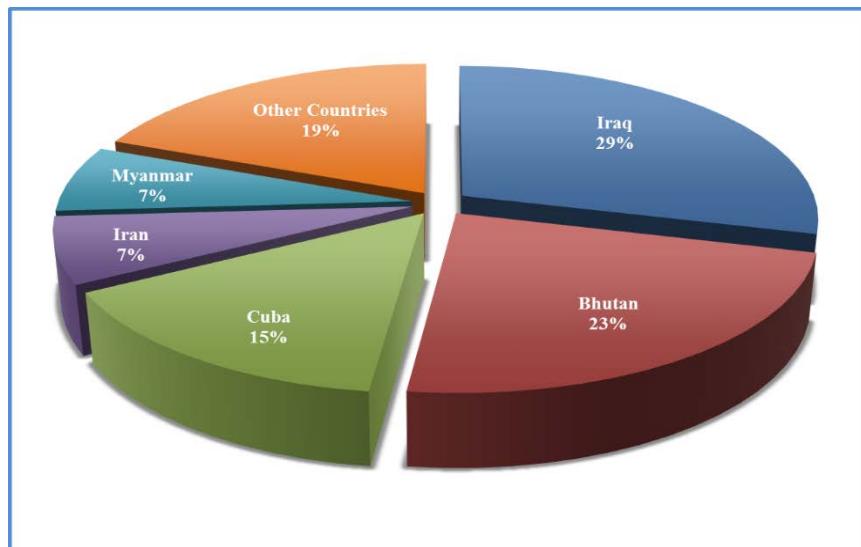


Source: OIG analysis of SSA data on SSNs assigned to asylees.

OASDI and SSI Benefits

Of the 608,390 refugees, parolees, and asylees who received SSNs, about 30,000 (5 percent) were eligible for OASDI and/or SSI payments. Fifty-eight percent of the OASDI recipients were age 19 or younger, while 55 percent of SSI recipients were age 60 or older. As shown in Figure E–5, top countries of birth for these noncitizens were Iraq, Bhutan, Cuba, Iran, and Myanmar.

Figure E–5: Top Countries of Birth of OASDI/SSI Recipients



Source: OIG analysis of SSA data on SSNs assigned and benefits paid.

- Characteristics of OASDI Beneficiaries
 - ✓ 90 percent qualified for benefits as a dependent spouse or child.
 - ✓ 58 percent were age 19 or younger.
 - ✓ The top three countries of birth were Cuba, Mexico, and Myanmar.
- Characteristics of SSI Recipients
 - ✓ 55 percent were age 60 and older.
 - ✓ 86 percent applied for benefits within 12 months of SSN assignment.
 - ✓ The top three countries of birth were Iraq, Cuba, and Bhutan.

Appendix F – SCOPE AND METHODOLOGY

To accomplish our objectives, we:

- Reviewed the applicable sections of the Public Laws, Code of Federal Regulations, *Social Security Act*, and Social Security Administration's (SSA) Program Operations Manual System.
- Obtained a data extract from the Social Security Number Application Process system for the period January 1, 2011 through December 31, 2015. We designed our population to include only original Social Security number (SSN) applications for refugees, parolees, and asylees.
- Using data from the Master Beneficiary and Supplemental Security Records, we identified and calculated Old-Age, Survivors and Disability Insurance (OASDI) and Supplemental Security Income (SSI) benefits paid to our population during our audit period.
- Using the beneficiaries identified for each immigration category of refugee, parolee, and asylee, we selected a random sample of 50 for both OASDI beneficiaries and SSI recipients. For these 300 beneficiaries, we determined whether SSA properly assigned SSNs and sufficiently verified eligibility for OASDI and SSI benefits paid to refugees, parolees, and asylees.
- Validated the claimant's eligibility for an SSN and lawful presence using the Department of Homeland Security online Systematic Alien Verification for Entitlements¹ program reports. For the documentation of lawful presence, our population overlapped with the prior Office of the Inspector General Audit *Title II Beneficiaries Receiving Benefits Under the Lawful Presence Payment Provisions* (A-09-12-21288). As of December 29, 2014, SSA had implemented the audit recommendations. Therefore, we limited our review to beneficiaries in our sample who applied for benefits beginning January 1, 2015. As such, we limited our lawful presence documentation review to subsequent benefit applications.
- Reviewed queries from SSA's Master Beneficiary and Supplemental Security Records, Numident, Master Earnings File, Modernized Claims System, Modernized SSI Claims System, and Claims Folder Records Management System to determine whether SSA sufficiently verified eligibility for OASDI and SSI benefit payments made to refugees, parolees, and asylees.
- Determined the number of SSNs assigned by calendar year for 2011 through 2015. We also identified and summarized the countries of birth for each immigration category of refugee, parolee, and asylee.

¹ SAVE is a fee-based intergovernmental initiative designed to help Federal, State, tribal, and local government agencies and licensing bureaus confirm immigration status information.

We determined whether the computer-processed data from the Social Security Number Application Process were sufficiently reliable for our intended use. We tested the data to determine their completeness and accuracy. These tests allowed us to assess the reliability of the data and achieve our audit objective.

We conducted our review in Birmingham, Alabama, between May 2016 and March 2017. We tested the data obtained for our audit and determined them to be sufficiently reliable to meet our objective. The principal entity reviewed was the Office of the Deputy Commissioner for Operations. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for 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 objectives.

Appendix G – AGENCY COMMENTS



SOCIAL SECURITY

MEMORANDUM

Date: July 3, 2017 Refer To: S1J-3

To: Gale S. Stone
Acting Inspector General

From: Stephanie Hall /s/
Acting Deputy Chief of Staff

Subject: The Office of the Inspector General Draft Report, “Social Security Numbers Assigned and Benefits Paid to Refugees, Parolees, and Asylees” (A-08-16-50142) --INFORMATION

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

Please let me know if we can be of further assistance. You may direct staff inquiries to Gary S. Hatcher at (410) 965-0680.

COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL (OIG) DRAFT REPORT, “SOCIAL SECURITY NUMBERS ASSIGNED AND BENEFITS PAID TO REFUGEES, PAROLEES, AND ASYLEES” (A-08-16-50142)

As good stewards of taxpayer funds, and to preserve the public’s trust in our programs, we remain focused on paying the right benefit, to the right person, at the right time. In doing so, we are committed to protecting the integrity of the Social Security number (SSN) and take seriously our responsibilities to issue an SSN to only those eligible to receive one. We are pleased OIG concluded we properly assigned SSNs to refugees, parolees, and asylees and correctly verified their eligibility for Old-Age, Survivors and Disability Insurance benefits and Supplemental Security Income payments. Below is our response to the recommendation.

Recommendation 1

We recommend that SSA issue a reminder to employees to maintain all supporting evidence of lawful presence in the United States upon verification of a noncitizen’s immigration status for initial claims and post-entitlement actions.

Response

We agree.

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