

*Audit Report*

Match of Puerto Rico Death  
Information Against Social Security  
Administration Records

*A-08-14-14013 | August 2019*

# OIG

Office of the Inspector General  
SOCIAL SECURITY ADMINISTRATION

## MEMORANDUM

**Date:** August 26, 2019 **Refer To:**

**To:** The Commissioner

**From:** Inspector General

**Subject:** Match of Puerto Rico Death Information Against Social Security Administration Records (A-08-14-14013)

The attached final report presents the results of the Office of Audit's review. The objectives were to (1) determine whether the Social Security Administration (SSA) made payments to beneficiaries and representative payees who were deceased according to Puerto Rico Department of Health vital records and (2) identify non-beneficiaries who were deceased according to Puerto Rico vital records but whose death information did not appear in SSA records.

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.



Gail S. Ennis

Attachment

# Match of Puerto Rico Death Information Against Social Security Administration Records

## A-08-14-14013



August 2019

Office of Audit Report Summary

### Objectives

To (1) determine whether the Social Security Administration (SSA) made payments to beneficiaries and representative payees who were deceased according to Puerto Rico Department of Health vital records and (2) identify non-beneficiaries who were deceased according to Puerto Rico vital records but whose death information did not appear in SSA records.

### Background

To identify and prevent payments after death, SSA established a program under which States (and U.S. territories) can voluntarily contract with SSA to provide it with death data to match against SSA's records. SSA and the States developed the Electronic Death Registration (EDR) process to improve the accuracy and timeliness of death information. States electronically submit death reports to SSA, and, if the numberholder data match SSA records, SSA systems automatically post the State death information and terminate payments to deceased beneficiaries. Puerto Rico does not have EDR in place.

Puerto Rico Department of Health provided us a vital records data file of the personally identifiable information of approximately 568,000 numberholders who died in Puerto Rico from January 1992 through December 2016. We matched the data against SSA payment records and Numident.

### Findings

SSA issued approximately \$11.6 million in payments after death to 149 beneficiaries and 4 representative payees who died in Puerto Rico from January 1992 through December 2016. Identifying and correcting these discrepancies will prevent approximately \$1.4 million in additional improper payments after death over the next 12 months. We also identified 33,258 non-beneficiaries who were deceased according to Puerto Rico Department of Health vital records but whose death information was not in SSA's Numident.

We could not determine why the deaths were not in SSA's Numident or whether Puerto Rico reported the deaths to SSA. Implementing EDR should help ensure Puerto Rico deaths are properly and timely reported to SSA.

The Numident contained death information for two of the four representative payees; however, SSA had not replaced the representative payees. In several prior audits, we found SSA did not always replace representative payees after it posted death information to their Numident records.

### Recommendations

We recommend SSA:

1. Take action on the 149 deceased beneficiaries we identified.
2. Take action on the four deceased representative payees we identified.
3. Take action on the 33,258 deceased non-beneficiaries we identified to add their deaths to the Numident, as appropriate.

SSA agreed with our recommendations.

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## **ABBREVIATIONS**

C.F.R.	Code of Federal Regulations
EDR	Electronic Death Registration
NAPHSIS	National Association for Public Health Statistics and Information Systems
OASDI	Old-Age, Survivors and Disability Insurance
OIG	Office of the Inspector General
POMS	Program Operations Manual System
Pub. L. No.	Public Law Number
SSA	Social Security Administration
SSI	Supplemental Security Income
Stat.	Statutes at Large
U.S.C.	United States Code

## OBJECTIVES

Our objectives were to (1) determine whether the Social Security Administration (SSA) made payments to beneficiaries<sup>1</sup> and representative payees who were deceased according to Puerto Rico Department of Health vital records and (2) identify non-beneficiaries<sup>2</sup> who were deceased according to Puerto Rico vital records but whose death information did not appear in SSA records.

## BACKGROUND

To identify and prevent payments after death, section 205(r) of the *Social Security Act* requires that SSA establish a program under which States (and U.S. territories) can voluntarily contract with SSA to provide it with death data to match against its records.<sup>3</sup> Accordingly, SSA and the States developed the Electronic Death Registration (EDR) process to improve the accuracy and timeliness of death information. Through EDR, 48 States and jurisdictions electronically submit death reports to SSA,<sup>4</sup> and SSA completes an online, real-time verification of the Social Security number. If the numberholder data match SSA records, SSA systems automatically post the State death information to the Numident, an SSA database that stores personally identifiable information for all Social Security numberholders,<sup>5</sup> and terminate payments to deceased beneficiaries. EDR is not the only way SSA receives death information; it also receives death reports from other sources, such as family members and funeral directors. SSA uses Numident information to create a file of death information it shares with other Federal benefit-paying agencies. Puerto Rico does not have EDR in place.

When a representative payee<sup>6</sup> dies, SSA must replace the payee or send payments directly to the beneficiary.<sup>7</sup> SSA may pay the beneficiary directly on an interim basis until it finds a suitable payee or on a permanent basis if it determines the beneficiary is capable of managing his/her

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<sup>1</sup> We use the term “beneficiary” throughout this report in reference to Old-Age, Survivors and Disability Insurance beneficiaries (OASDI) and/or Supplemental Security Income (SSI) recipients in current payment status.

<sup>2</sup> This refers to deceased individuals who were not in current or suspended payment status at the time of our review.

<sup>3</sup> *Social Security Act*, 42 U.S.C. § 405(r)(1) (govinfo.gov 2017). The term “State” includes the Commonwealth of Puerto Rico. *Social Security Act*, 42 U.S.C. § 1301(a)(1) (govinfo.gov 2017).

<sup>4</sup> National Association for Public Health Statistics and Information Systems (NAPHSIS), *Information Systems for Vital Records Stewardship*, naphsis.org (last visited June 27, 2019). NAPHSIS reports that 49 States and jurisdictions are using EDR, including Puerto Rico. However, as of May 2019, the Puerto Rico Department of Health stated it is working towards the EDR implementation requirements, but the system is not yet implemented.

<sup>5</sup> See SSA, *POMS*, GN 02602.050, A (October 30, 2017).

<sup>6</sup> SSA appoints a representative payee to receive and manage benefit payments for individuals unable to manage their own finances because of their youth or mental and/or physical impairments. *Social Security Act*, 42 U.S.C. §§ 405(j), 1383(a)(2)(A)(ii) (govinfo.gov 2017).

<sup>7</sup> 20 C.F.R. §§ 404.2050; 416.650 (govinfo.gov 2018).

own benefits.<sup>8</sup> The *Social Security Act* requires that SSA establish a system of accountability for monitoring representative payees.<sup>9</sup> If a representative payee dies and is not replaced, SSA cannot be sure the funds are being used to meet the beneficiary's needs, such as food, clothing, shelter, and medical care.<sup>10</sup> Additionally, if another individual acts as a representative payee without SSA's knowledge, that person is not subject to SSA's financial oversight and reporting responsibilities—such as reporting events to SSA that may affect the individual's entitlement or benefit payment amount.<sup>11</sup>

Puerto Rico Department of Health provided us a vital records data file of the personally identifiable information of approximately 568,000 Social Security numberholders who died in Puerto Rico from January 1992 through December 2016. Our match of the data against SSA payment records and the Numident identified OASDI beneficiaries and SSI recipients who were in current payment status and representative payees whose personally identifiable information matched that of a deceased individual in the Puerto Rico data file. We also identified individuals who were not receiving OASDI benefits or SSI payments (that is, non-beneficiaries) whose death information did not appear in SSA's Numident. We obtained death certificates for the OASDI beneficiaries, SSI recipients, and representative payees in current payment status and provided the certificates to SSA. See Appendix A for information on our scope and methodology.

## RESULTS OF REVIEW

SSA issued approximately \$11.6 million in payments after death to 149 beneficiaries and 4 representative payees who died in Puerto Rico from January 1992 through December 2016.<sup>12</sup> Identifying and correcting these discrepancies will prevent approximately \$1.4 million in additional improper payments after death over the next 12 months. We also identified 33,258 non-beneficiaries who were deceased according to Puerto Rico Department of Health vital records but whose death information was not in SSA's Numident.

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<sup>8</sup> 20 C.F.R. §§ 404.2050(d), 404.2055 (govinfo.gov 2018). 20 C.F.R. §§ 416.650(d), 416.655 (govinfo.gov 2018). SSA may suspend payment under 20 C.F.R. §§ 404.2011(b) and 416.611(b) if it finds that paying the beneficiary directly would cause substantial harm, and the Agency cannot find a suitable alternative representative payee before the next payment is due.

<sup>9</sup> *Social Security Act*, 42 U.S.C. §§ 405(j)(3)(A), (6)(A)-(B), 1383(a)(2)(C)(i), (F)(iv), (G)(ii) (govinfo.gov 2017).

<sup>10</sup> 20 C.F.R. §§ 404.2040(a); 416.640(a) (govinfo.gov 2018).

<sup>11</sup> 20 C.F.R. §§ 404.2035; 416.635 (govinfo.gov 2018).

<sup>12</sup> At the time of our review, 1 of the 149 beneficiaries' and 2 of the 4 representative payees' death information appeared in the Numident. Therefore, we obtained death certificates for 150 beneficiaries. While we took steps to ensure the death certificates belonged to the true numberholder, the true numberholder could be alive. See Appendix A for more information about the steps we took to determine whether the true numberholder was deceased.

We could not determine why the deaths were not in SSA's Numident or whether Puerto Rico reported the deaths to SSA. Puerto Rico does not have EDR. Implementing EDR should help ensure Puerto Rico deaths are properly and timely reported to SSA.

The Numident contained death information for two of the four representative payees; however, SSA had not replaced the representative payees. In several prior audits,<sup>13</sup> we found SSA did not always replace representative payees after it posted death information to their Numident records. Moreover, in a July 2019 audit, we found SSA did not follow regulations or its policy to evaluate all beneficiaries'/recipients' ability to manage their own funds or select new representative payees, if appropriate, when the Agency was notified the current representative payees died. We estimated SSA issued approximately \$10.7 million in OASDI benefits and SSI payments to 846 deceased representative payees.<sup>14</sup>

## **Payments Issued to Deceased Beneficiaries**

We identified 149 current pay beneficiaries whose personally identifiable information matched that of a deceased individual in the Puerto Rico death data.<sup>15</sup> Based on our results, SSA issued these beneficiaries approximately \$11.5 million in payments after their deaths. Examples follow.

- A beneficiary receiving retirement benefits died in December 2005. SSA records did not contain a date of death and therefore retirement benefits continued. As of February 2019, SSA had issued approximately \$377,000 in payments after death.
- A beneficiary receiving retirement benefits died in June 2003. SSA records did not contain a date of death and therefore retirement benefits continued. As of February 2019, SSA had issued approximately \$315,000 in payments after death.
- A widow receiving survivor benefits died in December 1992. SSA records did not contain a date of death and therefore the survivor benefits continued. As of February 2019, SSA had issued approximately \$255,000 in payments after death.

Puerto Rico does not report deaths to SSA through the EDR process. According to the Registrar of the Puerto Rico Department of Health, Puerto Rico cannot make its death data available to SSA as quickly as jurisdictions with EDR systems.<sup>16</sup> In addition, NAPHSIS stated that

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<sup>13</sup> SSA, OIG, *Deceased Representative Payees*, A-01-14-34112, p. 2 (June 2015); *Follow up on the Social Security Administration's Procedures to Identify Representative Payees Who Are Deceased*, A-01-06-16054, p. 3 (October 2006); and *The Social Security Administration's Procedures to Identify Representative Payees Who Are Deceased*, A-01-98-61009, p. 4 (September 1999).

<sup>14</sup> SSA, OIG, *Follow-up on Deceased Representative Payees*, A-01-18-50350, p. 2 (July 2019).

<sup>15</sup> At the time of our review, one beneficiary's death information appeared in the Numident. Therefore, we obtained death certificates for the remaining 148 beneficiaries.

<sup>16</sup> NAPHSIS, *Hurricane Maria and Puerto Rico Vital Records – The Difficulties of Death Registration During a Natu [sic]*, naphsis.org (March 23, 2018).

implementing an EDR system is costly.<sup>17</sup> While EDR is voluntary, according to the Puerto Rico Department of Health, it received an award from the Centers for Disease Control and Prevention and is working towards the EDR implementation requirements. SSA stated that “EDR is highly accurate . . .” and “Universal implementation of EDR has the potential to virtually eliminate death reporting errors and would ensure that our death records—whether pertaining to current beneficiaries or other persons—include the most accurate and most current information.”<sup>18</sup> In 2004, SSA began receiving and processing EDR reports of death from several States,<sup>19</sup> and EDR had slowly expanded to include 48 States and jurisdictions.<sup>20</sup> As illustrated in Table 1, approximately 75 percent of the beneficiaries SSA improperly paid in Puerto Rico died between 2007 and 2016—several years after SSA first began receiving EDR reports from other States.

**Table 1: Beneficiaries Whose Personally Identifiable Information Matched that of a Deceased Individual in the Puerto Rico Death Data**

Year of Death	Number of Beneficiaries	Percent of Total Beneficiaries
1992-1996	3	2.0
1997-2001	8	5.4
2002-2006	27	18.1
2007-2011	56	37.6
2012-2016	55	36.9
<b>Total</b>	<b>149</b>	<b>100.0</b>

**Source:** OIG Analysis of Puerto Rico Death Data.

Of the 149 beneficiaries, 9<sup>21</sup> (6 percent) were receiving SSI payments and died in Puerto Rico. Under the SSI program, individuals are not eligible to receive SSI payments while living in

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<sup>17</sup> SSA, OIG, *State Use of Electronic Registration Reporting*, A-09-15-50023, pp. 6 and A-1 (July 2017). The Department of Health and Human Services, through the Centers for Disease Control and Prevention, funds States to assist them in establishing EDR. NAPHSIS, an association of State vital records directors and registrars, worked with SSA to develop standards and guidelines for a nation-wide EDR system. SSA, OIG, *State Use of Electronic Registration Reporting*, A-09-15-50023, p. 2 (July 2017).

<sup>18</sup> *Examining Federal Improper Payments and Errors in the Death Master File: Hearing Before the Senate Committee on Homeland Security and Governmental Affairs*, 114<sup>th</sup> Congress p. 64 (2015) (statement of Sean Brune, Senior Advisor to the Deputy Commissioner, Office of Budget, Finance, Quality, and Management, U.S. Social Security Administration).

<sup>19</sup> SSA, OIG, *State Use of Electronic Registration Reporting*, A-09-15-50023, p. 2 (July 2017).

<sup>20</sup> NAPHSIS, *Information Systems for Vital Records Stewardship*, naphsis.org (last visited June 27, 2019). NAPHSIS reports that 49 States and jurisdictions are using EDR, including Puerto Rico. However, as of May 2019, the Puerto Rico Department of Health stated it is working towards the EDR implementation requirements, but the system is not yet implemented.

<sup>21</sup> Three of the nine were dually entitled to both OASDI benefits and SSI payments.

Puerto Rico.<sup>22</sup> While we could not determine how long these beneficiaries were in Puerto Rico before their deaths, each of the nine beneficiaries' SSI payments went to a U.S. address.<sup>23</sup>

In April 2019, we provided SSA the death information for the 149 beneficiaries<sup>24</sup> to terminate their benefits, initiate recovery of payments made after their deaths, and refer cases with possible fraud to SSA OIG's Office of Investigations. As of June 2019, SSA had suspended benefits for 4 of the 149 beneficiaries. Identifying and correcting these discrepancies will prevent approximately \$1.3 million in additional improper payments after death over the next 12 months.<sup>25</sup>

## Payments to Deceased Representative Payees

We identified four deceased representative payees to whom SSA had issued approximately \$136,000 in payments after their deaths. When a representative payee dies, SSA must replace the payee or send payments directly to the beneficiary. SSA may pay the beneficiary directly on an interim basis until it finds a suitable payee or on a permanent basis if it determines the beneficiary is capable of managing his/her own benefits.<sup>26</sup>

The Numident contained death information for two of the four representative payees; however, SSA had not replaced the representative payees. In several prior audits,<sup>27</sup> we found SSA did not always replace representative payees after it posted death information to their Numident records.

In April 2019, we provided SSA with information on each of the four deceased representative payees. As of June 2019, SSA had not taken any action on these cases. Identifying and correcting discrepancies will prevent approximately \$25,000 in additional payments after death over the next 12 months.<sup>28</sup>

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<sup>22</sup> Section 1611(f) of the *Social Security Act* indicates that, with limited exceptions, no individual shall be considered eligible for SSI payments for any month throughout which the individual is outside the United States. 42 U.S.C. §§ 1382(f), 1382c(e) (govinfo.gov 2017).

<sup>23</sup> One of the three dually entitled beneficiaries changed her address from Florida to Puerto Rico approximately 3 weeks before her death.

<sup>24</sup> At the time of our review, one beneficiary's death information was in the Numident. Therefore, we obtained death certificates for the remaining 148 beneficiaries.

<sup>25</sup> We based this estimate on the assumption that conditions will remain the same for the next 12 months.

<sup>26</sup> 20 C.F.R. §§ 404.2050(d), 404.2055, 416.650(d), and 416.655 (govinfo.gov 2018). SSA may suspend payment under 20 C.F.R. §§ 404.2011(b) and 416.611(b) if it finds paying the beneficiary directly would cause substantial harm, and the Agency cannot find a suitable alternative representative payee before the next payment is due.

<sup>27</sup> SSA, OIG, *Deceased Representative Payees*, A-01-14-34112, p. 2 (June 2015); *Follow up on the Social Security Administration's Procedures to Identify Representative Payees Who Are Deceased*, A-01-06-16054, p. 3 (October 2006); and *The Social Security Administration's Procedures to Identify Representative Payees Who Are Deceased*, A-01-98-61009, p. 4 (September 1999).

<sup>28</sup> We based this estimate on the assumption that conditions will remain the same for the next 12 months.

## Deceased Non-beneficiaries

We identified 33,258 non-beneficiaries<sup>29</sup> who were deceased according to Puerto Rico Department of Health vital records but who did not have death information in SSA's Numident. As illustrated in Table 2, less than 10 percent of these non-beneficiaries died between 2012 and 2016.

**Table 2: Non-beneficiaries by Year of Death**

Year of Death	Number of Non-beneficiaries	Percent of Total Non-beneficiaries
1992-1996	6,870	20.7
1997-2001	8,076	24.3
2002-2006	8,771	26.4
2007-2011	6,302	18.9
2012-2016	3,239	9.7
<b>Total</b>	<b>33,258</b>	<b>100.0</b>

**Source:** OIG Analysis of Puerto Rico Death Data.

Resolving these discrepancies will reduce SSA's exposure to future improper payments and improve the accuracy and completeness of the death information it shares with other Federal benefit-paying agencies.<sup>30</sup> In April 2019, we provided SSA with data that identified all 33,258 non-beneficiaries to take necessary action. SSA stated that, because these types of cases do not involve improper payments, their cleanup is a low priority and resource-dependent. SSA stated the earliest it could consider posting death information for these cases via the Continuing Death Data Improvement project under its Information Technology Modernization is Fiscal Year 2020.

## CONCLUSIONS

We determined SSA issued improper payments after death or had not recorded death information on its Numident on a small percentage of approximately 568,000 decedents in the Puerto Rico Department of Health vital records data file. However, based on our results, we determined SSA issued approximately \$11.6 million in payments after death to 149 beneficiaries and 4 representative payees who died in Puerto Rico from January 1992 through December 2016.

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<sup>29</sup> We matched Puerto Rico death records that included a validated Social Security number, name, and date of birth (per Enumeration Verification System process) against SSA's Numident. We excluded individuals who were receiving OASDI benefits or SSI payments.

<sup>30</sup> Although SSA shares its death information with other Federal benefit-paying agencies, those agencies should independently verify the individual's death before they take adverse action. Also, based on January 2013 legislation, SSA was taking steps to improve the accuracy of its death information. *Improper Payments Elimination and Recovery Improvement Act of 2012*, Pub. L. No. 112-248, § 5(g)(1), 126 Stat. 2390, p. 2396 (2013).

Identifying and correcting these discrepancies will prevent approximately \$1.4 million in additional improper payments after death over the next 12 months.<sup>31</sup> In addition, posting death information to the Numidents of the individuals will reduce SSA's exposure to future improper payments and improve the accuracy and completeness of the death information the Agency shares with other Federal benefit-paying agencies.

We could not determine why the deaths were not in SSA's Numident or whether Puerto Rico reported the deaths to SSA. While 48 States and jurisdictions report deaths to SSA through the EDR process,<sup>32</sup> Puerto Rico does not have this process in place. However, as of May 2019, it had received an award from the Centers for Disease Control and Prevention and was working toward implementing EDR. Implementing EDR should help ensure Puerto Rico deaths are properly and timely reported to SSA. For two of the four deceased representative payees, the Numident contained death information, but SSA had not replaced the representative payees.

## RECOMMENDATIONS

We recommend SSA:

1. Take action on the 149 deceased beneficiaries we identified.
2. Take action on the four deceased representative payees we identified.
3. Take action on the 33,258 deceased non-beneficiaries we identified to add their deaths to the Numident, as appropriate.

## AGENCY COMMENTS

SSA agreed with our recommendations. The Agency's comments are included in Appendix B.



Rona Lawson  
Assistant Inspector General for Audit

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<sup>31</sup> We based this estimate on the assumption that conditions will remain the same for the next 12 months.

<sup>32</sup> NAPHSIS, *Information Systems for Vital Records Stewardship*, naphsis.org (last visited June 27, 2019). NAPHSIS reports that 49 States and jurisdictions are using EDR, including Puerto Rico. However, as of May 2019, the Puerto Rico Department of Health stated it was working towards the EDR implementation requirements, but the system is not yet implemented.

# *APPENDICES*

## **Appendix A –SCOPE AND METHODOLOGY**

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To accomplish our objectives, we:

- Reviewed Federal laws and regulations related to death matches with State<sup>1</sup> agencies; the Social Security Administration’s (SSA) policies and procedures; and prior Office of the Inspector General reports.
- Obtained a Puerto Rico Department of Health vital records data file and identified approximately 568,000 individuals recorded as having died in Puerto Rico from January 1992 through December 2016. We matched these records against SSA’s Enumeration Verification System and payment records and identified:
  - 149 Old-Age, Survivors and Disability Insurance (OASDI) beneficiaries and/or Supplemental Security Income (SSI) recipients in current payment status whose names and dates of birth matched those of deceased individuals in the Puerto Rico death data.<sup>2</sup>
    - Reviewed SSA’s systems, Puerto Rico death data, and LexisNexis, as necessary.
    - Determined whether SSA (a) documented contact with the beneficiary<sup>3</sup> *after* the date of death in Puerto Rico records, (b) had previously determined the beneficiary was a victim of identity theft, or (c) listed two individuals on the same Numident record and the deceased individual was not the beneficiary. If so, we considered the beneficiary to be alive, and if not, we considered the beneficiary to be deceased.
    - Obtained Puerto Rico death certificates for 148 of these 149 beneficiaries (one already had a date of death on SSA’s Numident) and referred them to SSA.
  - 4 deceased representative payees, with beneficiaries in current payment status as of April 2019, whose Social Security numbers, names, and dates of birth matched those of deceased individuals in the Puerto Rico death data. We obtained Puerto Rico death certificates for two of these four payees as these two did not have a date of death on SSA’s Numident. We referred these four cases to SSA.
  - 33,258 non-beneficiaries<sup>4</sup> whose Social Security numbers, names, and dates of birth matched those of deceased individuals in the Puerto Rico death data but whose death information was not in SSA’s Numident as of March 2019. We referred these cases to SSA.

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<sup>1</sup> The term “State” includes the Commonwealth of Puerto Rico. *Social Security Act*, 42 U.S.C. § 1301(a)(1) ([govinfo.gov](http://govinfo.gov) 2017).

<sup>2</sup> We matched the Social Security number, name, and date of birth on the Puerto Rico Department of Health vital records data file with SSA’s Numident for the 149 deceased beneficiaries.

<sup>3</sup> We use the term “beneficiary” throughout this report in reference to OASDI beneficiaries and/or SSI recipients in current payment status.

<sup>4</sup> This is in reference to deceased individuals who were not in current or suspended payment status at the time of our review.

- Calculated payments issued after death to the 149 beneficiaries and 4 representative payees.

We conducted our audit in Birmingham, Alabama, between November 2018 and May 2019. We determined the data used for this audit were sufficiently reliable to meet our audit objectives. The primary entities audited were the Offices of the Deputy Commissioners for Operations and Systems. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

## **Appendix B – AGENCY COMMENTS**

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### **SOCIAL SECURITY**

#### **MEMORANDUM**

Date: August 14, 2019 Refer To: S1J-3

To: Gail S. Ennis  
Inspector General

From: Stephanie Hall  
Acting Deputy Chief of Staff

Subject: Office of the Inspector General Draft Report “Match of Puerto Rico Death Information Against Social Security Administration Records” (A-08-14-14013) -- 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 Trae Sommer at (410) 965-9102.

Sincerely,

A handwritten signature in blue ink that reads "Stephanie Hall".

Stephanie Hall  
Acting Deputy Chief of Staff

**SSA COMMENTS ON THE OFFICE OF INSPECTOR GENERAL DRAFT REPORT,  
“MATCH OF PUERTO RICO DEATH INFORMATION AGAINST SOCIAL  
SECURITY ADMINISTRATION’S RECORDS” (A-08-14-14013)**

The receipt of timely and accurate death information greatly reduces the occurrence of improper payments to deceased beneficiaries. The death information we collect aids us in preventing approximately \$50 million in improper payments each month.

The Electronic Death Registration (EDR) process provides us with timely and accurate death information, and the current President’s Budget provides funding for expansion of EDR to provide faster, better quality data on deaths. One of EDR’s key features is the ability to match a deceased person’s Social Security number and other identifying information to our records to ensure accuracy before submission. We look forward to working with Puerto Rico as they prepare for EDR implementation. Additionally, we will continue to make incremental changes to increase the completeness of death information in our records and promote integrity through deterring improper payments.

Our responses to the recommendations are below.

**Recommendation 1**

Take action on the 149 deceased beneficiaries we identified.

**Response**

We agree.

**Recommendation 2**

Take action on the four deceased representative payees we identified.

**Response**

We agree.

**Recommendation 3**

Take action on the 33,258 deceased non-beneficiaries we identified to add their deaths to the Numident, as appropriate.

**Response**

We agree to post death information as resources allow for records that pass our screening process.

## MISSION

By conducting independent and objective audits, evaluations, and investigations, the Office of the Inspector General (OIG) inspires public confidence in the integrity and security of the Social Security Administration's (SSA) programs and operations and protects them against fraud, waste, and abuse. We provide timely, useful, and reliable information and advice to Administration officials, Congress, and the public.

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