

Audit Report

Deceased Beneficiaries and
Recipients Who Do Not Have Death
Information on the Numident

A-09-14-14068 / July 2015



Office of the Inspector General
SOCIAL SECURITY ADMINISTRATION

MEMORANDUM

Date: July 17, 2015

Refer To:

To: The Commissioner

From: Inspector General

Subject: Deceased Beneficiaries and Recipients Who Do Not Have Death Information on the Numident
(A-09-14-14068)

The attached final report presents the results of our audit. Our objectives were to evaluate the adequacy of the Social Security Administration's recently implemented controls to improve the recording of deceased beneficiaries' deaths on the Numident and its plans to address the approximately 1.4 million deceased beneficiaries who have no death information on the Numident.

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.

Patrick P. O'Carroll, Jr.

Attachment

Deceased Beneficiaries and Recipients Who Do Not Have Death Information on the Numident

A-09-14-14068



July 2015

Office of Audit Report Summary

Objectives

To evaluate the adequacy of the Social Security Administration's (SSA) recently implemented controls to improve the recording of deceased beneficiaries' deaths on the Numident and its plans to address the approximately 1.4 million deceased beneficiaries who have no death information on the Numident.

Background

When SSA receives a report that a beneficiary or recipient has died, it records the date of death on the Master Beneficiary (MBR) or Supplemental Security Record (SSR) and terminates benefits. In addition, SSA's Death Alert, Control, and Update System (DACUS) receives, processes, and records death information on SSA's Numident. SSA uses death information from the Numident to create a record of death information called the Death Master File (DMF), which is available to Federal agencies and the public.

In prior audits, we found that approximately 1.4 million deceased beneficiaries' deaths were not on the Numident and DMF. Our prior audits included several recommendations for corrective action. SSA agreed with our recommendations and stated it was developing a plan to redesign DACUS to correct death discrepancies between the MBR/SSR and Numident.

Findings

SSA has made progress in improving how it records beneficiaries' deaths on the Numident. This includes recently implemented controls to improve the consistency of personally identifiable and death information between the MBR/SSR and Numident. In addition, SSA has a 3-year plan to redesign how its systems process death information. However, SSA's recently implemented controls did not always ensure it recorded deceased beneficiaries' deaths on the Numident. Finally, SSA is determining whether there is a cost-effective method to correct our previously identified 1.4 million deceased beneficiaries who do not have death information on the Numident.

Recommendations

We recommend that SSA:

1. Determine why it did not record death information on the Numident for the 48 beneficiaries who died after September 2012.
2. Include in its Death Processing Redesign project, controls to identify and correct when deceased beneficiaries' deaths are not recorded on the Numident.

SSA agreed with our recommendations.

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ABBREVIATIONS

DACUS	Death Alert, Control, and Update System
DIPS	Death Information Processing System
DMF	Death Master File
HAVV	Help America Vote Verification
MBR	Master Beneficiary Record
OASDI	Old-Age, Survivors and Disability Insurance
OIG	Office of the Inspector General
PII	Personally Identifiable Information
POMS	Program Operations Manual System
Pub. L. No.	Public Law Number
SSA	Social Security Administration
SSI	Supplemental Security Income
SSN	Social Security Number
SSR	Supplemental Security Record
U.S.C.	United States Code

OBJECTIVES

Our objectives were to evaluate the adequacy of the Social Security Administration's (SSA) recently implemented controls to improve the recording of deceased beneficiaries¹ deaths on the Numident and its plans to address the approximately 1.4 million deceased beneficiaries who have no death information on the Numident.

BACKGROUND

Title II of the *Social Security Act* provides monthly benefits to retired and disabled workers, including their dependents and survivors.² SSA maintains the Master Beneficiary Record (MBR), which is a file of all current and previously entitled beneficiaries. The Supplemental Security Income (SSI) program provides payments to financially needy individuals who are aged, blind, or disabled under Title XVI of the *Social Security Act*.³ SSA maintains the Supplemental Security Record (SSR), which is a file of all current and previously entitled SSI recipients.

When SSA receives a report that a beneficiary has died, it records the date of death on the MBR/SSR and terminates benefits.⁴ In addition, SSA's Death Alert, Control, and Update System (DACSUS) receives, processes, and records death information on SSA's Numident, an electronic file that contains personally identifiable information (PII)⁵ for each person issued a Social Security number (SSN). SSA uses death information from the Numident to create a record of death information called the Death Master File (DMF).⁶ There are two versions of the DMF.

- The full file contains death records from the Numident and is made available to certain Federal agencies.
- The public file contains death records from the Numident but does not include State death records.⁷

¹ We use the term "beneficiary" generically to refer to a Title II beneficiary and a Title XVI recipient.

² *Social Security Act*, § 201 *et seq.*, 42 U.S.C. § 401 *et seq.*

³ *Social Security Act*, § 1601 *et seq.*, 42 U.S.C. § 1381 *et seq.*

⁴ SSA, POMS, SI 02301.250 (December 2, 2004) and GN 02602.071 (August 1, 2014).

⁵ PII is any information that can be used to distinguish or trace an individual's identity, such as name, SSN, date and place of birth, or mother's maiden name.

⁶ SSA provides the public DMF to the Department of Commerce's National Technical Information Service, which sells it to public and private customers who can purchase the public DMF and subscribe to periodic updates for an additional cost.

⁷ SSA, POMS, GN 02602.060 (August 4, 2014).

Generally, if the PII on the MBR/SSR and Numident does not match, SSA will not record the death on the Numident.

SSA also uses death information from the Numident during its Annual Wage Reporting process to determine whether wage or self-employment reports are erroneous. In addition, E-Verify, a Department of Homeland Security Internet-based system, uses death information from the Numident to allow employers to determine newly hired employees' eligibility to work in the United States. Finally, the Help America Vote Verification (HAVV) system allows States to verify the accuracy of newly registered voters' names and dates of birth, as well as the last four digits of their SSNs, in SSA's Numident.⁸

In prior audits, we found SSA needed to improve controls to ensure it records death information on the Numident for deceased beneficiaries. Our audits have disclosed that approximately 1.4 million deceased beneficiaries' deaths were not on the Numident and therefore not on the DMF.⁹ These audits also included recommendations to (1) determine whether SSA can efficiently correct any of the 1.4 million beneficiary records identified by our audits and (2) develop a cost-effective method for identifying deceased beneficiaries who have death information on the MBR/SSR but not on the Numident. SSA agreed with our recommendations and stated it was developing a plan to redesign DACUS to correct death discrepancies between the MBR/SSR and Numident.

In a March 2015 audit, we identified approximately 6.5 million individuals age 112 or older who did not have death information on the Numident.¹⁰ This report included several recommendations for corrective action.

For our current review, we identified 37,328 deceased beneficiaries who had a date of death on the MBR/SSR but did not have death information on the Numident as of October 2013. These beneficiaries represented deaths that had occurred after our prior audits (see Appendix A).

RESULTS OF REVIEW

SSA has made progress in improving how it records deceased beneficiaries' deaths on the Numident. This includes recently implemented controls to improve the consistency of PII and death information between the MBR/SSR and Numident. In addition, SSA has a 3-year plan to redesign how its various systems process death information. However, SSA's recently implemented controls did not always ensure it recorded deceased beneficiaries' deaths on the

⁸ *Help America Vote Act of 2002*, Pub. L. No. 107-252, Title III, § 303, 116 Stat. 1666, 1708-1714 (October 29, 2002); see also *Social Security Act*, § 205(r)(8); 42 U.S.C. § 405(r)(8).

⁹ SSA, OIG, *Title II Deceased Beneficiaries Who Do Not Have Death Information on the Numident* (A-09-11-21171), July 9, 2012; and SSA, OIG, *Title XVI Deceased Recipients Who Do Not Have Death Information on the Numident* (A-09-12-22132), May 3, 2013.

¹⁰ SSA, OIG, *Numberholders Age 112 or Older Who Did Not Have a Death Entry on the Numident* (A-06-14-34030), March 4, 2015.

Numident. Finally, SSA is determining whether there is a cost-effective method to correct our previously identified 1.4 million deceased beneficiaries who do not have death information on the Numident.

Improvements to SSA's Processing of Death Information

Since our prior audits, SSA has taken steps to improve how its various systems process death information. This includes the following.

- In September 2012, SSA implemented a project to prevent the adjudication of a Title II/XVI claim if the PII on the claims application and Numident differ (that is, name and date of birth). SSA employees must resolve and correct the discrepancy between the claim and Numident. SSA implemented this control to improve the consistency of PII between the MBR/SSR and Numident thereby increasing the likelihood that SSA will correctly record death information on the Numident.
- In June 2013, SSA implemented a monthly match to identify discrepancies in death information between the Numident and MBR/SSR. If death data on the Numident do not match the death data on the MBR/SSR, SSA generates an alert for employees to review and correct the discrepancy.
- SSA initiated a Death Processing Redesign project, which is a multi-year project to improve the accuracy and consistency of death information, to identify and reduce improper payments and reduce the likelihood of the improper release of PII. The first phase of the project replaced data input screens with a modernized, Web-based system called the Death Information Processing System (DIPS). Subsequent phases, planned for FYs 2015 and 2016, include an interface of the new Web-based screens with SSA applications, such as the Title II/XVI benefit payment applications, a redesign of the DACUS batch processing, and the development of management information reports. Beyond 2016, SSA will determine whether it needs further enhancements to improve the accuracy and consistency of death information.

Additional Deceased Beneficiaries with No Death Information on the Numident

Although SSA has not fully implemented its Death Processing Redesign project, additional deceased beneficiaries' deaths were not always recorded on the Numident. Since our prior audits, we have identified an additional population of 37,328 deceased beneficiaries who did not have death information on the Numident. From this population, we selected a random sample of 50 beneficiaries for review. Our review disclosed that SSA had properly terminated the payments for all 50 beneficiaries; however, the death information for 48 (96 percent) was not on the Numident and therefore not on the DMF (see Appendix B). SSA subsequently recorded the death information on the Numident for the remaining two (4 percent) beneficiaries.

Recent Controls Did Not Always Ensure Beneficiaries' Deaths Were on the Numident

In September 2012, SSA implemented a project to improve the consistency of PII between the MBR/SSR and Numident. This project includes a control to prevent the adjudication of a Title II/XVI claim if there is a PII discrepancy between the name and date of birth on the claim and Numident. The initial claims system alerts SSA employees of discrepancies they should resolve by correcting the claim or Numident. This should therefore improve the accuracy of the DMF. However, we found that when SSA processes a post-entitlement action or redetermination,¹¹ its systems do not detect when there is a PII discrepancy between the post-entitlement action or redetermination and the Numident.

From the population of 37,328 deceased beneficiaries who did not have death information on the Numident, 119 had applied for benefits after September 2012 and subsequently died. We reviewed the 119 beneficiaries' records and found that SSA subsequently recorded death information on the Numident for 71 (59.7 percent) but not for the remaining 48 (40.3 percent). Of the 48 beneficiaries, 46 had PII on their claims applications that matched the PII on their Numident. For the remaining two beneficiaries, SSA should have identified and resolved the PII discrepancies between the claims application and Numident.

We provided the records for the 48 beneficiaries to SSA to determine why the death information was not on the Numident.¹² Based on its review of 13 of these records, SSA stated it did not have sufficient information to determine why the deaths were not on the Numident because they had occurred over 1 year before, and it does not retain transactions beyond 1 year. SSA officials stated it appeared the death information was not forwarded to the appropriate systems to update the Numident.

Finally, in response to our prior audit,¹³ SSA stated it would implement a monthly Numident and MBR/SSR match in June 2013 that would alert employees to correct mismatched records, including the records identified in our prior audits. However, our review found the monthly match did not detect any of the 48 beneficiaries with no death information on the Numident. This occurred because the monthly match only identifies when there is a date of death on the Numident for beneficiaries in current pay or if there is a discrepant date of death on the MBR/SSR and Numident.

¹¹ A redetermination is a review to determine whether a beneficiary is still eligible for SSI payments. SSA, POMS, SI 02305.001 (August 29, 2014) and DI 11070.010 (May 6, 2014).

¹² This included Title II beneficiaries and Title XVI recipients.

¹³ SSA, OIG, *Title XVI Deceased Recipients Who Do Not Have Death Information on the Numident* (A-09-12-22132), May 3, 2013.

SSA's Plans to Address 1.4 Million Deceased Beneficiaries with No Death Information on the Numident

In our prior audits, we found that approximately 1.4 million deceased beneficiaries' deaths were not on the Numident and therefore not on the DMF.¹⁴ Although SSA is implementing DIPS to ensure it records all future deaths on the Numident and DMF, it is determining whether there is a cost-effective method to correct the approximately 1.4 million deceased beneficiaries whose deaths are not on the Numident and DMF.

To assist SSA in determining whether it could add death information to the Numident, we analyzed the approximately 1.4 million deceased beneficiaries' records and found that

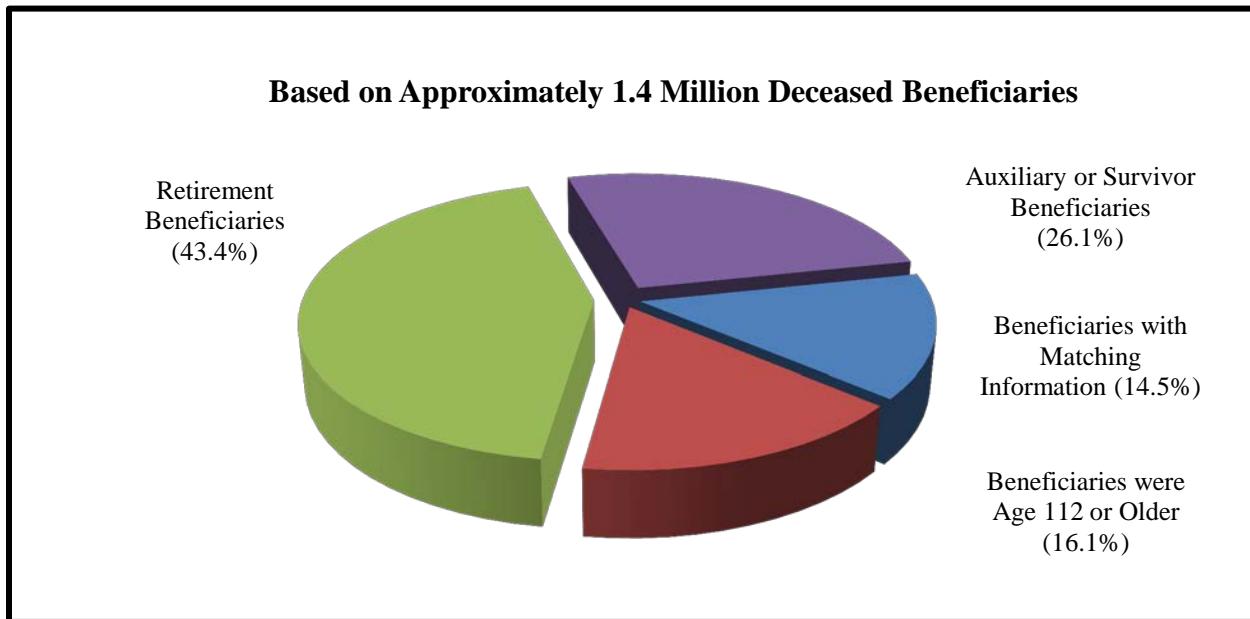
- 202,026 (14.5 percent) had PII on the MBR/SSR that matched the Numident;
- 224,433 (16.1 percent) were age 112 or older according to the Numident;¹⁵
- 604,793 (43.4 percent) were entitled to retirement benefits before their deaths. As such, SSA would have verified their SSNs on their claims application and MBR with the Numident; and
- 363,709 (26.1 percent) were auxiliary or survivor beneficiaries and the remaining SSI recipients not included above. Since SSA did not always verify an auxiliary/survivor SSN on their claims application with the Numident, there is some risk the death information on the MBR may be incorrect.

Figure 1 summarizes the approximately 1.4 million deceased beneficiaries' deaths identified in our prior audits that were not on the Numident and DMF.

¹⁴ SSA, OIG, *Title II Deceased Beneficiaries Who Do Not Have Death Information on the Numident* (A-09-11-21171), July 9, 2012; and SSA, OIG, *Title XVI Deceased Recipients Who Do Not Have Death Information on the Numident* (A-09-12-22132), May 3, 2013.

¹⁵ On September 18, 2014, the Gerontology Research Group reported that 42 known living individuals worldwide had reached age 112.

Figure 1: Deaths from Prior Audits Not Recorded on the Numident



Based on our analysis, we believe SSA may be able to automate the recording of approximately 1 million (73.9 percent) of the 1.4 million beneficiaries' deaths on the Numident. This includes 914,960 Title II beneficiaries and 116,292 Title XVI recipients.

As we noted in our prior reviews,¹⁶ employers and other individuals were using these deceased beneficiaries' SSNs. Specifically, we found that employers made E-Verify inquiries for deceased beneficiaries and did not receive any indication from SSA these individuals were deceased. We also found that beneficiaries incorrectly had earnings recorded on the Master Earnings File after their deaths. In addition, we found that HAVV requests for deceased beneficiaries indicated they were not deceased. This could allow an individual to vote using a deceased beneficiary's identity.

Furthermore, missing death information on the DMF reduces the effectiveness of Federal benefit-paying agencies' ability to detect erroneous payments. Missing death information on the public DMF also hinders private industry as well as State and local governments' ability to identify and prevent identity fraud.

¹⁶ SSA, OIG, *Title II Deceased Beneficiaries Who Do Not Have Death Information on the Numident* (A-09-11-21171), July 9, 2012; and SSA, OIG, *Title XVI Deceased Recipients Who Do Not Have Death Information on the Numident* (A-09-12-22132), May 3, 2013.

CONCLUSIONS

SSA has made progress in improving how it records beneficiaries' deaths on the Numident. This includes recently implemented controls to improve the consistency of PII and death information between SSA's payment records and Numident. In addition, SSA has a 3-year plan to redesign how its various programmatic systems process death information. However, SSA's recently implemented controls did not always ensure it recorded death information on the Numident for deceased beneficiaries. Finally, SSA is determining whether there is a cost-effective method to correct our previously identified 1.4 million deceased beneficiaries who do not have death information on the Numident.

RECOMMENDATIONS

We recommend that SSA:

1. Determine why it did not record death information on the Numident for the 48 beneficiaries who died after September 2012.
2. Include in its Death Processing Redesign project, controls to identify and correct when deceased beneficiaries' deaths are not recorded on the Numident.

AGENCY COMMENTS

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

APPENDICES

Appendix A – SCOPE AND METHODOLOGY

From the Social Security Administration's (SSA) Master Beneficiary (MBR) and Supplemental Security Records (SSR), we obtained a data extract of Title II/XVI beneficiaries whose benefits SSA terminated for death and whose MBR/SSR had a date of death. Using this extract, we identified a population of 37,328 deceased beneficiaries who did not have a date of death recorded on the Numident as of October 2013. From this population, we selected a random sample of 50 recipients for review. We also identified 119 beneficiaries who had applied for benefits after September 2012 and subsequently died.

To accomplish our objectives, we

- reviewed the applicable Federal law, including the *Social Security Act*, and SSA's Program Operations Manual System;
- interviewed SSA employees from the Offices of Earnings, Enumeration, and Administrative Systems; Quality Improvement; and Retirement and Disability Policy; and
- reviewed queries from SSA's MBR, SSR, Numident, Modernized Claims System, and Modernized Supplemental Security Income Claims System.

We determined the computer-processed data from the MBR/SSR were sufficiently reliable for our intended use. We conducted tests to determine the completeness and accuracy of the data. These tests allowed us to assess the reliability of the data and achieve our audit objectives.

We performed audit work in Richmond, California, and Baltimore, Maryland, between June 2014 and March 2015. The entities audited were the Offices of the Deputy Commissioners for Operations and Systems.

We conducted our 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 the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix B – SAMPLING METHODOLOGY AND RESULTS

Missing Death Information on the Numident

From the Social Security Administration’s Master Beneficiary (MBR) and Supplemental Security Records (SSR), we obtained a data extract of Title II/XVI deceased beneficiaries whose MBR/SSR had a date of death who did not have a date of death on the Numident. Using this extract, we identified a population of 37,328 deceased beneficiaries who did not have a date of death recorded on the Numident as of October 2013. From this population, we selected a random sample of 50 beneficiaries for review. Our review found that 48 (96 percent) of the 50 individuals did not have death information on the Numident.

Appendix C – AGENCY COMMENTS



SOCIAL SECURITY

MEMORANDUM

Date: July 2, 2015 **Refer To:** S1J-3

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

From: Frank Cristaudo /s/
Counselor to the Commissioner

Subject: Office of the Inspector General Draft Report, “Deceased Beneficiaries and Recipients Who Do Not Have Death Information on the Numident” (A-09-14-14068)--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.

Attachment

**COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL DRAFT REPORT,
“DECEASED BENEFICIARIES AND RECIPIENTS WHO DO NOT HAVE DEATH
INFORMATION ON THE NUMIDENT” (A-09-14-14068)**

Thank you for the opportunity to comment on the draft report. We appreciate the Office of the Inspector General's (OIG) work in helping us to improve our death information processing. Your prior recommendations were instrumental in helping us to shape the current re-design of our death reporting processes.

We are still concerned that this report blurs the distinction between the two files of death information we share with others. One of these is the Death Master File (DMF), which cannot contain death information based on State records. We release the DMF to the public through the National Technological Information Service. The second file is the full file of our death information, which does contain State death reports. We share this file with Federal benefit-paying agencies.

We realize that publicly available information contains conflicting descriptions of these files. The rules and methods under which we receive, and share, the death information in our files have changed over the years. We believe that, moving forward, we need to make a clear distinction between the files we create--that is, the file of records available to the public and the file that we can only share with Federal benefit-paying agencies.

We have collected death information since the implementation of the Social Security Act in 1935 in order to properly administer our programs. In numerous audits, the OIG found that we use this information well for our own purposes. Because we collect death information for the sole purpose of ensuring correct Social Security payments to beneficiaries, we do not have complete or accurate death records for all Americans, especially for non-beneficiaries. We began sharing death information with the public in the 1980's, because of a Freedom of Information Act lawsuit settled in 1978. We are committed to maintaining death information that is as accurate as is feasibly possible. We are also committed to enhancing the quality of the old death-related information that we share, but we know that no solution will make the death information in our files fully accurate or complete.

In an effort to clear up some of the confusion related to our death files, we are planning to rebrand/rename the files to more clearly define the purpose and limitations of each file. The Office of Management and Budget suggested that we take actions based on the fact that the publicly available file is often mischaracterized as a comprehensive historical database of every death in the United States, when, in fact, it is not. We expect to rebrand the files in fiscal year 2016 and will put in place a comprehensive communications strategy as part of that effort.

Further, now that the Bipartisan Budget Act, enacted on December 26, 2013, puts specific limits on the distribution of the public DMF, but makes no changes to the complete file of death information we share with Federal benefit-paying agencies; we believe it is even more important to keep the distinction between the files crystal clear. In fact, this law (P.L. 113-67) contains within it a definition of the DMF, as being the file of our death information that does not include State records:

Continuing Appropriations Resolution, 2014 (P.L. 113-67)

SEC. 203. RESTRICTION ON ACCESS TO THE DEATH MASTER FILE.

(d) DEATH MASTER FILE.—For purposes of this section, the term “Death Master File” means information on the name, social security account number, date of birth, and date of death of deceased individuals maintained by the Commissioner of Social Security, other than information that was provided to such Commissioner under section 205(r) of the Social Security Act (42 U.S.C. 405(r)).

While the definition is for purposes of that section, as a codified definition we believe it carries weight. We would strongly encourage the OIG to support us in the effort to educate Congress and the public on the distinctions between the two files.

Finally, we appreciate the changes OIG made to the report to clarify that there are two specific files. However, even with that language change, there are references within the report that seem to blur the two files. For example:

On the findings page, “SSA uses death information from the Numident to create a record of death information called the Death Master File (DMF), which is available to Federal agencies and the public.” We are concerned that this could be read as conflating the two files—the one that NTIS sells to the public and the full file that we share with Federal benefit-paying agencies.

Another example, on page 5, “Although SSA is implementing DIPS to ensure it records all future deaths on the Numident and DMF, it is determining whether there is a cost-effective method to correct the approximately 1.4 million deceased beneficiaries whose deaths are not on the Numident and DMF.” This statement blurs the distinction of the two files by giving the reader the impression that all deaths on the Numident will appear on the DMF when, in fact, we are limited by the law from putting death reports from State records on the DMF released to the public. State records will appear on the full file of death information we share with Federal benefit-paying agencies. We have sent suggested changes to this sentence, as well as other comments, as tracked changes document at the staff level.

Please find below our responses to the recommendations as well as some technical comments.

Recommendation 1

Determine why it did not record death information on the Numident for the 48 beneficiaries who died after September 2012.

Response

We agree. We are completing our analysis of the cases. We will report on our analysis and determine if we need to take corrective action by the end of August 2015.

Recommendation 2

Include in its Death Processing Redesign Project controls to identify and correct when deceased beneficiaries' deaths are not recorded on the Numident.

Response

We agree. We are in the second phase of a multi-phase Death Processing Redesign project. Upon completion, our Numident file will be our official source of death information prospectively. Centralized receipt and processing of death information through the Numident will control death information flow for all other systems. In addition, we continue to look for an automated way to reconcile discrepant death information between systems. We are defining the requirements for a clean-up run that would address discrepant death data in our records retroactively.

Appendix D – MAJOR CONTRIBUTORS

James J. Klein, Director, San Francisco Audit Division

Jack H. Trudel, Audit Manager

James Sippel, Senior Auditor

Wilfred Wong, Audit Data Specialist

MISSION

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